

To: Consultation Council Members

From: Pamela D. Walker, Vice Chancellor, Educational Services

RE: Accreditation Survey

The California Community College Chancellors Office (CCCCO) and our constituent groups have been actively involved in the issues of accreditation for the last several years. In 2015, the work of a CCCCCO Task Force on Accreditation evaluated the current processes for the 113 California community colleges. That report focused on qualities that would constitute an ideal accrediting agent and tracked the accrediting progress of our colleges.

Following that report, the California Community College Chief Executive Officers' (CEO's) met in March 2016 and after a catalytic conversation about accreditation developed two work groups to focus on the immediate task of improving the current commission function, structure and relation, as well as, exploring models of accreditation that could better align all segments of higher education in the Western Region. That work continues today.

In providing ongoing opportunities for all of our constituent groups to communicate and stay informed on the issues of accreditation, the CCCCCO is requesting information from members of Consultation Council through the survey attached.

This survey is being administered pursuant to Assembly Bill 404 [(Chiu) Chapter 623 of 2015], requiring the California Community Colleges Board of Governors "to conduct a survey of the community colleges, including consultation with representatives of both faculty and classified personnel, to develop a report to be transmitted to the United States Department of Education and the National Advisory Committee on Institutional Quality and Integrity that reflects a systemwide evaluation of the regional accrediting agency based on the criteria used to determine an accreditor's status."

This survey will add to the myriad of reports that concerning accreditation. Thus on behalf of the Board of Governors, the CCCCCO asks your organization to rank compliance of the Accrediting Commission for Community and Junior Colleges (ACCJC) on the following seven sections of the Code of Federal Regulations (CFR) and provide additional comments where relevant. The U.S. Department of Education has identified these sections of the CFR as requiring attention by the ACCJC as the basis for continuing recognition by the federal government.

You are invited to seek input from your members in this process. The deadline for completion is Friday, October 14, 2016. Please return your survey information to Kathy Carroll, Assistant to Vice Chancellor Pam Walker at kcarroll@cccco.edu.

Survey Instructions: Check only one box for each code section. “Strongly Agree” means your organization believes that ACCJC is in full compliance while “Strongly Disagree” suggests the opposite. A field for comments is available at the end of each section.

§ 602.12(b) Accrediting experience.

(b) A recognized agency seeking an expansion of its scope of recognition must demonstrate that it has granted accreditation or preaccreditation covering the range of the specific degrees, certificates, institutions, and programs for which it seeks the expansion of scope.

Strongly Agree Agree Disagree Strongly Disagree Neutral/No Opinion

Comments:

The ACCJC has not demonstrated experience or expertise in the expansion of scope to accredit four-year programs. They do not adequately review the institutions in their current scope.

ACCJC has ignored the input of the Academic Senate for California Community Colleges and the Chancellor’s Office on the four-year degree handbook for those colleges participating in the pilot baccalaureate program. The policies ACCJC adopted for four-year degree programs are at odds with Senior WASC (which has demonstrated expertise in accrediting four-year degree granting institutions).

§ 602.16(a)(1)(ii) Accreditation and preaccreditation standards.

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if -

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

(ii) Curricula

Strongly Agree

Agree

Disagree

Strongly Disagree

Neutral/No Opinion

Comments:

Curricula appear to be glossed over and given cursory review in favor of other measurements which have little to do with education.

The breadth, depth, and availability of curricula are rarely measured in a meaningful way.

Some of the requirements in the current standards do not address quality in curriculum, but instead require busy work such as the disaggregation of SLO data, rather than achievement data.

Many of the ACCJC standards have absolutely nothing to do with curriculum and do nothing to improve the quality of education offered by its member institutions.

§ 602.16(a)(1)(iii) Accreditation and preaccreditation standards.

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if –

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

(iii) Faculty

Strongly Agree Agree Disagree Strongly Disagree Neutral/No Opinion

Comments:

ACCJC ignores the existence of contingent faculty in accreditation and the significance of so many contingent faculty and so few regular faculty to allow a healthy higher education, let alone perform the business of higher education.

The agency appears not to care about quality of instructors, but the control factor of them by management, and in doing so, denies their value as knowledge workers, content creators, and employees. They appear more concerned about the numbers of students served, than skills learned, and the number of managers with private-sector powers, than managers as operational facilitators.

ACCJC is hostile to the multiple roles faculty perform on a college, including, but not limited to shared governance.

Public comments by high-ranking members of the agency show a strange and unsettling tendency to lump, judge, and demonize faculty outside the federal standards discussed.

§ 602.17(a) Application of standards in reaching an accrediting decision.

The agency must have effective mechanisms for evaluating an institution's or program's compliance with the agency's standards before reaching a decision to accredit or preaccredit the institution or program. The agency meets this requirement if the agency demonstrates that it -

(a) Evaluates whether an institution or program -

(1) Maintains clearly specified educational objectives that are consistent with its mission and appropriate in light of the degrees or certificates awarded;

(2) Is successful in achieving its stated objectives; and

(3) Maintains degree and certificate requirements that at least conform to commonly accepted standards

Strongly Agree **Agree** **Disagree** **Strongly Disagree** **Neutral/No Opinion**

Comments:

Their mechanisms are entirely ineffective because they have lost the confidence of the educators within the institutions they accredit.

The mission of California Community Colleges includes life-long learning, which often has no end-result; not all students seek degrees or certificates, and to punish a college for this is antithetical to this section of the code.

There is not sufficient time to meet standards when they change. If an institution is evaluated in 2020, self-evaluation would commence in 2018. If standards change in 2018, they go into effect in 2019, holding the institution responsible for standards it just learned.

For the last ten years, the ACCJC has increased pressure on activities the institutions were expected to do that were not in the standards themselves.

The ACCJC continues to exert pressure on institutions to change their missions to align with their idea of student success, regardless of the values of the existing communities.

§ 602.18(c) Ensuring consistency in decision-making.

The agency must consistently apply and enforce standards that respect the stated mission of the institution, including religious mission, and that ensure that the education or training offered by an institution or program, including any offered through distance education or correspondence education, is of sufficient quality to achieve its stated objective for the duration of any accreditation or preaccreditation period granted by the agency. The agency meets this requirement if the agency -

(c) Bases decisions regarding accreditation and preaccreditation on the agency's published standards.

Strongly Agree Agree Disagree Strongly Disagree Neutral/No Opinion

Comments:

Standards appear to be unevenly applied and reveal a glaring interference with labor negotiations.

Evidence of inconsistency exists from one accrediting team to another when applied to colleges having the same institutional features.

The external evaluation visiting teams do this, but the ACCJC itself has a history of overruling the judgments of their visiting teams and making substantial changes in the findings without themselves having or seeking any additional direct evidence of (non-)compliance by the institutions.

§ 602.20(b) Enforcement of standards.

(b) If the institution or program does not bring itself into compliance within the specified period, the agency must take immediate adverse action unless the agency, for good cause, extends the period for achieving compliance.

Strongly Agree Agree Disagree Strongly Disagree Neutral/No Opinion

Comments:

Although we generally agree with ACCJC's compliance with this section, this is not seen in a positive light. The ACCJC substantially overreacts to minor non-compliance by assigning harsh sanctions as their default position without acknowledging any argument from institutions qualifying for a "good cause" exemption. The emphasis should be on helping institutions improve, not on punishing them for noncompliance. This comment is consistent with the Chancellor's Office Task Force Report on Accreditation and Bureau of State Audits findings on the ACCJC.

§ 602.25 Due process.

The agency must demonstrate that the procedures it uses throughout the accrediting process satisfy due process. The agency meets this requirement if the agency does the following:

- (a)** Provides adequate written specification of its requirements, including clear standards, for an institution or program to be accredited or preaccredited.
- (b)** Uses procedures that afford an institution or program a reasonable period of time to comply with the agency's requests for information and documents.
- (c)** Provides written specification of any deficiencies identified at the institution or program examined.
- (d)** Provides sufficient opportunity for a written response by an institution or program regarding any deficiencies identified by the agency, to be considered by the agency within a timeframe determined by the agency, and before any adverse action is taken.
- (e)** Notifies the institution or program in writing of any adverse accrediting action or an action to place the institution or program on probation or show cause. The notice describes the basis for the action.

Strongly Agree **Agree** **Disagree** **Strongly Disagree** **Neutral/No Opinion**

Comments:

AACJC has been arbitrary, inconsistent, and even reckless in its application of standards and remedies between various institutions, rewarding and favoring certain types while punishing others.

Of all the sections of federal law contained in the survey, this is the most egregiously flouted. Both the standards and the compliance mechanisms are vague, precluding any reasonable implementation of due process.

There are too many examples of the agency issuing requirements that need to be met on an unrealistically short timeline with inadequate guidance of expectation, particularly in the requirements for Student Learning Outcomes (SLOs).