

Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges (ACCJC)

Preliminary Response to the 2015 Report of the California Community Colleges Chancellor’s Office Task Force on Accreditation

This document is prepared in advance of the upcoming Special Meeting of the Commission for discussion of the 2015 Report of the California Community Colleges Chancellor’s Office Task Force on Accreditation (hereafter, “the Report”). Its purpose is to provide a preliminary response to the Report, and to summarize key facts and identify areas that may be advanced through further discussion. Following the Commission’s Special Meeting, we anticipate there will be follow-up with the field across the Western Region. The Commission will consider the policies and practices it has already revised and changed, as well as others that might be enhanced or revised as a result of examination and discussion of the Report. While we have focused our request for input toward the Special Meeting, we will remain open to further consideration and input concerning our standards, policies, and practices in succeeding months.

BACKGROUND

ACCJC recently completed a three-year (2012-2014) review of standards and practices, and is in the process of implementing its 2014 Standards, policy revisions, and new practices with the accreditation cycle that begins in spring 2016. Many of these changes were described for the field in the article, “Accreditation: New Standards, New Practices” in the Spring/Summer 2015 edition of *ACCJC News* and which is available on the ACCJC website. Changes will be made as the new Standards are initially piloted and/or implemented, and areas of needed alignment become apparent. ACCJC is committed to continuous quality improvement in its own practices.

From 2012-2014, ACCJC conducted its regular review of standards and policies – one that is initiated every six years. ACCJC announced the review, and provided many opportunities for input from member institutions and the public about its policies and practices. In reviewing its policies and practices, the ACCJC considers all information and points of view it receives through written comment submitted to the Commission, through formal hearings it holds, through discussion with groups such as the CEOs and CIOs, and through comments made at public meetings of the commission prior to adoption of policies and standards. In the years 2012-2014, ACCJC held numerous public hearings, and sought written and oral comment on its standards and practices at constituency group meetings in the region, and through its website.

During this review, ACCJC also contracted with experts to provide insight and suggestions as to issues such as transparency, accountability, public information, and focus on improving student success. The context for the Commission’s decisions on change to standards, policies, and practices also includes the U.S. Department of Education (USDE) regulations, the stipulations that USDE gives to ACCJC as a result of recognition reviews, and practices of other recognized accrediting bodies, particularly the regional accreditors. The ACCJC has attempted to strike a balance between responsiveness to member institutions’ input, and the need to adhere to recognition criteria and reflect accreditation best practices.

This document is comprised of four sections:

1. ACCJC General Concerns with the 2015 Task Force Report.

In this section, ACCJC describes some concerns it has with the timing and the nature of the Report.

2. ACCJC Response to the Findings and Recommendations in the 2015 Task Force Report.

In this section, ACCJC provides some responses to the general findings and recommendations of the Report and expresses concerns with some of the Report's appended documents

3. ACCJC Response to the Task Force Recommendation.

In this section, ACCJC briefly comments on the Report's overall recommendation to change the accreditor.

4. ACCJC Response to the Nine Ideal Attributes of an Accrediting Organization in the Task Force Report.

In this section, ACCJC provides a large amount of factual information about how it operates and about regulatory requirements. ACCJC also provides information about how it has responded to input from the field provided generally and through its recent review of standards and practices.

ACCJC General Concerns with the 2015 Task Force Report

ACCJC has a number of concerns about the timing and nature of the Report that are worth providing at the outset of this analysis.

- The Report was issued after ACCJC completed its own transparent, three-year review process, but before ACCJC published its policy revisions and changes to practice. An earlier report, a 2013 Task Force Report which was “never finalized or published” (Report p. 4), might have been helpful if offered formally within the ACCJC’s own review process and timelines, but it was never provided to ACCJC, creating the impression that the Task Force did not intend its work as feedback to the ACCJC during its review process.
- The Report, in analyzing the accreditation actions taken by the Commission over the preceding ten years, appears to reject peer review in California. The California Community Colleges faculty and administrators play a critical role in the processes for establishing the standards of the ACCJC. These individuals comprise the majority of evaluation team members, and comprise the majority of Commissioners, who make the decisions on accreditation status of member institutions. The hundreds of peer evaluators and the 57 Commissioners who served the ACCJC from 2005 to 2015 have, through their actions on teams and as commissioners, applied the standards faithfully to member institutions while working to meet them at their own institutions.
- The Report was created by 10 individuals appointed through the State Chancellor’s Office. There has been no opportunity for College input on the Report’s findings or for ACCJC input or response to the findings and conclusions of the Report. The lack of transparency in the issuance of the Report is self-evident. The Chancellor’s office is reportedly now seeking input from colleges, after the Board of Governors has acted upon the Report and sent it to the USDE.
- The Report does not discuss or acknowledge changes to ACCJC practices and policies that have been made as part of ACCJC’s ongoing continuous improvement process or as a result of its recent review of standards and practices. Rather, the Report assumes ACCJC has made no reasonable response to the various forms of input it has received, and states that “ACCJC has shown little evidence of its willingness or ability to address concerns that have been raised.” (Report, p. 4) In fact, the Report failed to look at ACCJC’s revisions in policy and changes in practices, as those occurred prior to its recent systemic review and as a result of its recent systemic review. In later sections of this response, the ACCJC outlines the many changes it made as it received input.
- The Report buttresses its arguments that ACCJC needs to reform with five appendices prepared by other parties: the 2009 State Chancellor’s Task Force, various California Community Colleges Academic Senate resolutions adopted by the Senate at its meetings over the years (also in the absence of discussion with the ACCJC), the 2011 RP Group Report, the Chief Executive Officers 2014 Recommendations sent in a letter to ACCJC, and the June 2014 California State Auditor Report. It argues that the existence of these documents, resolutions, and letters signal the “outstanding and consistent issues that have been raised” and the need for a “new and sustainable structure.” (Report, p. 4). The Report does not examine the merits of the recommendations, the quality of the factual information that was used by the various authors to generate them, nor whether those

recommendations are viable within the national practice of accreditation or federal regulatory requirements. The Report just assumes each recommendation is equally weighted as important, even when the recommendations are contradictory and do not serve the purpose of accreditation.

- The Chancellor’s Office apparently considers its un-discussed Report to be final. Upon release of the Report, ACCJC quickly asked for a meeting with the Task Force to discuss its Report, and was told its proposed date of October 9 was “too early.” In the meantime, the Chancellor’s Office took action on September 22, 2015 to send the Report to the USDE, with a letter indicating that the Report represents the views of the Board of Governors and the California public member institutions. The Chancellor’s letter has asked that NACIQI not recognize ACCJC to accredit baccalaureate degrees – something that directly affects member institutions in the entire Western Region. The transcript of the Board of Governors’ meeting does not indicate an opposition to ACCJC’s scope request.
- The Report and its supporting documents misrepresent and miscount “sanctions”, and used the number of institutions that were sanctioned as argument not that California Community Colleges faced daunting challenges meeting standards but that the ACCJC is somehow out of line. There is no discussion of the conditions in this region that led colleges to be unable to demonstrate they met standards, nor of recommendations ACCJC gave to the State Chancellor in 2010 on how the system could help colleges even as ACCJC worked with colleges such as Lassen Community College, College of the Redwoods, Solano Community College, and others through periods of crisis. There is no consideration of whether the colleges were better off as a result of ACCJC actions and their successful efforts to improve.
- The Report appears to have a clear political motive. Within days of its release, it was endorsed by press releases issued by the Mayor of San Francisco, the City Attorney of San Francisco, and the head of the American Federation of Teachers. The politicization of accreditation in California is not in the public’s interest.

ACCJC Response to the Findings and Recommendations in the 2015 Task Force Report

In the Report, the Chancellor's Office Task Force cites a number of recommendations put forward some years ago by the California statewide Academic Senate, the California State Auditor, the RP Group, the California public community college CEOs, and an earlier 2009 Chancellor's Office Task Force.

To start, it might be helpful to point out:

Some of the recommendations cited in the Report are dated and many have been responded to with past changes or with the Commission's 2015 changes to practice, which are in the process of being rolled out this academic year. The Report's supporting documents (prior "reports" on accreditation) span the years from 2009 to 2014. The early recommendations are sourced in information that predates 2009. The result is that some of the "facts" or findings cited within the various reports, and that serve as the background to the 2015 Report, no longer exist. For example:

- The 2015 Report cites a need for meaningful input and participation in the "appointment" of ACCJC Commissioners. Commissioners have not been "appointed" since 2010. They are elected by the CEOs of member colleges. The ACCJC commissioner *election* process provides for broad input in choosing commissioners. It was developed after the USDE found that the previous Commissioner selection process, wherein constituency groups such as the Academic Senate or the California CEOs, appointed a Selection Committee that selected commissioners, were chosen by a committee including individuals chosen by and representing constituencies groups such as the Academic Senates, the California Community Colleges Chief Executive Officers (CCCCEO) and the California Community College Trustees (CCCT), did not meet the federal regulatory criteria for ACCJC to maintain its "separate and independent" status. (Section 602.14(b)(1) and (3). The election process allows the CEO of each member institution to participate in an election of commissioners. A Nominating Committee that is constituted equally of four CEOs and four Commissioners creates a slate from among nominees. Nominations may be submitted by any person at an ACCJC member college and by Commissioners, among others. There is a provision for CEOs to add at large candidates to the ballot, and one sitting Commissioner has been elected through that process already.
- The 2009 State Chancellor's Task Force (Chancellor Jack Scott) asked the ACCJC to "strengthen standards-based training of visiting teams and ALOs." The 2014 CEOs recommended ACCJC "improve institutional training for accreditation" and establish task forces with professionals in constituent groups..." The 2009 State Chancellor's Task Force recommended that ACCJC institute annual training with various entities in the California Community Colleges, specifically the Senate and the Community College League, and improve the "standards-based training" of visiting team members and Accreditation Liaison Officer (ALOs). The various supporting documents of the Report all ask for training for different constituency groups in the California Community Colleges. ACCJC has delivered this training. For example:
 - ACCJC developed and delivered training on Standard III, particularly IIID, Finance, for business and finance officers at their Association of Chief Business Officers meetings every few years; the next training is scheduled for fall 2015.

- ACCJC began Regional Workshops in 2010 that bring training and discussion about standards and required practices to a workshop in close proximity to every member institution. These regional workshops were on the standards that have been the most frequent cited by evaluation teams as unmet by colleges. The first workshop series was on program review and data, the second was on student learning outcomes assessment. These workshops continue this year with a region-wide workshop entitled Assessment 101, for college faculty, department chairs and deans, and two workshops in “Taking Assessment to the Program Level.”
- ACCJC partnered with the WASC Senior College and University Commission (WASC Senior) on the assessment leadership academy, a faculty-training program.
- The ACCJC implemented training for ALOs and has held seven all-day events, some in conjunction with Chief Instructional Officer conference, and one with the ACCJC Accreditation Symposium (open to all members and constituency groups).
- The online course, Accreditation Basics, was designed to help college constituencies understand basic accreditation concepts and processes, and once it was required of all team members, ACCJC changed team training to become more specifically focused on the key aspects of the accreditation standards and the evaluation processes.
- The Academic Senate recommended ACCJC provide “comprehensive training to its evaluation teams”. The ACCJC does provide this training, and keeps improving in response to feedback from the trainees and the colleges undergoing review. Team members now take an online course, Accreditation Basics, and attend an all-day team training. In 2016, ACCJC will initiate “new evaluator training” and thereafter elevate the content of its evaluator-training workshop.
- ACCJC has provided a great deal of training in partnership with, and specifically for, the California Community College constituency groups through its partnerships with their organizations. ACCJC worked with the Academic Senate on its Accreditation Institute, and the RP Group on the Student Success Conference. ACCJC partnered with the Community College League of California to help create the Effective Trusteeship program, and has presented at CCCT meetings each year as well as helped other, non-ACCJC staff to become competent trainers for governing board members. (*See Attachment 1, “ACCJC Service to the Region, 2010-2015”*)

In sum, since the 2009 Chancellor’s Task Force Report, ACCJC sponsored or held many conference presentations and workshops; engaged in training partnerships with other California entities such as the Community College League of California, provided its own training events, published news articles, and has held group and individual college training sessions to provide information about accreditation practice, the standards, and about specific standards.

Nonetheless, the 2015 Task Force Report cites older recommendations as if they have not been addressed. That Report has not examined specifically the changes and improvements ACCJC has made. More training is always a good idea, and ACCJC *has* responded to the call for more, and better training and will continue to do so.

The concerns expressed in the Crosswalk of Accreditation Recommendations 2009-2014 are provided without important context. In 2007, (and again in 2013), the USDE in its review of ACCJC’s petition for recognition found the ACCJC out of compliance with the federal regulation that requires an accreditor to withdraw accreditation if an institution does not come into compliance within two years of notice. It advised ACCJC that it had to inform its institutions clearly of the regulation for compliance, and had to act to have its institutions comply within two years, and provide only limited opportunities for extension of the time. The USDE’s analysis was based on institutional cases pulled from ACCJC’s files in which a few institutions were found noncompliant, then became compliant, then were found later to be noncompliant again. USDE’s specific findings were that if institutions were found noncompliant after they had come into compliance (i.e., for a second time), then ACCJC was not upholding the two-rule rule. ACCJC notified all college CEOs and ALOs of the finding in a memo to the field. The sanctions since 2007 reflect the Commissioners’ decision to apply the ACCJC policy language consistently when institutions are found out of compliance. The “compliance orientation” of ACCJC comes directly from the USDE actions, a point acknowledged in the introduction to the current Task Force Report but never included as context for the discussion of number of sanction.

The information compiled by the California Community Colleges Chancellor’s Office (CCCCO) and presented in appendix B, “ACCJC actions on California Community Colleges, Feb. 2005 to 2015” distorts information about accreditation sanctions and appears to inflate the sanction issue. It counts “total reporting cycles on sanction” in a way that misrepresents the facts about the Commission’s actions. For example, the right side column listing number of “reporting cycles on sanction” is misleading. If one takes Barstow College, the first entry with a sanction, the column lists “4” as the “total reporting cycles on sanctions.” Barstow was placed on warning in June 2012, and had a one year report due in June 2013, at which time the Commission found it had addressed many of its deficiencies but had a few to go. Warning was continued for another year, and in June 2014, the accreditation was reaffirmed. After it was placed on warning status, the college had two interactions with the Commission – one to acknowledge progress but retain the sanction, the other to acknowledge completion of necessary work and to remove the sanction and reaffirm accreditation. There is no “accreditation reporting cycle” but rather, each institution is given a length of time based on the importance of its needed improvements to quality, the complexity of the items it needs to “fix”, and its own statements about what work it has begun. The give and take between an institution and the Commission decision-making process cannot be reduced to, or fully understood by, the numbers in the “accreditation cycle” column. Furthermore, as the chart shows, most colleges that received a sanction improved their performance, came off sanction and remained strong.

The recommendations across constituent groups sometimes involved different meanings and desired emphases, and are in some cases contradictory to one another. For example,

- The 2009 State Chancellor’s task force suggested the ACCJC should “develop more non-public ways to communicate to campuses their need for improvement.” By contrast, the Academic Senate of California Community Colleges (ASCCC) focused on recommending “transparency in the proceedings and decision-making [including allowing the public to discuss a proposed sanction before a decision is rendered].” Nonpublic communications are not “transparent.”
- Another example relates to the inclusion of faculty on evaluation teams. Resulting from discussions with ASCCC designees some years ago, the ACCJC instituted a practice of constituting comprehensive evaluation teams with three faculty members. “Faculty” as

defined by the individual's home institution, includes instructional faculty qualified to teach in Career and Technical Education as well as other disciplines, librarians, counselors, and articulation officers. The California State Auditor's Report presented a perception – perhaps from dated information – that evaluation team reports lacked the perspective of faculty. Still other constituencies argue that “faculty” on evaluation teams should only include full-time teaching faculty at an institution. ACCJC is the only regional commission that constitutes its comprehensive evaluation teams with at least three faculty; others do not have that minimal requirement.

- The 2009 State Chancellor's Task Force recommended, “review visiting team selection process and consider means to involve a wider cross section of the individuals in our system who desire to participate.” However, the argument for broader inclusion of new evaluators is at odds with the recommendations of the ASCCC and the RP Group for more training, more specific training of various kinds for evaluation teams, and the arguments for improving the consistency of evaluation teams. Both values are important, but adding to the number of “new” evaluators adds to the needs for even more team training, while using experienced team members means teams will perform more consistently. In its operations, ACCJC considers both and tries to balance them; the Report ignores the need for balance, and provides recommendations in isolation of other important factors in the composition and training of teams.
- **The ACCJC has enjoyed a long-standing relationship with ASCCC** as a representative of California Community College faculty in the Western Region, and that has engaged in give-and-take on issues in forums such as the ASCCC fall conference, the Accreditation Institute, and in discussions with ASCCC designees concerning the expansion of faculty participation on teams, and so on. These discussions with ASCCC have very much influenced ACCJC practices, as did the oral and written input received from faculty across the region during the 2012-2014 Review of Accreditation Standards and Practices. Because the California statewide academic senate does not distribute its resolutions and recommendations beyond its membership, ASCCC recommendations may not be as effective for energizing change when the intended entity is other than the ASCCC membership.
- **The 2011 RP Group report, Focusing Accreditation on Quality Improvement, was received, reviewed, and responded to in 2011.** The ACCJC discussed the draft study in person with RP Group representatives. It discussed concerns with the sample size and the methodology of surveying institutions that had recently been sanctioned, and questioned whether these were “representative” of the region's experience with accreditation, and related matters. It discussed the likely bias this methodology would have on the report results. Prior to that time and continuing since then, collaborative efforts between ACCJC and the RP Group for improving accreditation processes, supporting improved college practices and strengthening understanding of accreditation have continued. The ACCJC has regularly participated in the RP Group's Strengthening Student Success Conference. RP Group members have served on ACCJC task forces and on evaluation teams, provide input and participate in accreditation activities that are core to ACCJC practices.

Not all of the means by which ACCJC engages with constituencies and provides input to member institutions are widely publicized. Several constituency-based organizations promote best practices within their organizational objectives. ACCJC supports the principle that identification and implementation of effective practices are the result of the professional

commitment to institutional improvement, and are not associated only with accreditation requirements. While ACCJC's participation in other organizations' professional development and other efforts is not always widely known, ACCJC's service to the field has consistently included such supports. For example:

- ACCJC was pleased to provide financial sponsorship for the ASCCC Accreditation Institute and the RP Group Strengthening Student Success Conference for a number of years.
- The Student Success Conference was preceded by the California Assessment Institute, which was for years sponsored by the ACCJC, researchers, CIOs and CSSOs.
- ACCJC staff and other designees have participated as advisory committee members, conference presenters, statement developers, editors, and in other capacities at the invitation of numerous organizations in higher education, including the Community College League of California, California Community College Trustees, and Pacific Postsecondary Education Council, Western Interstate Commission for Higher Education Cooperative for Educational Technology, Association of California Community College Administrators, National Institute for Learning Outcomes Assessment, American Council on Education, and others.
- The ACCJC played a significant role in training trustees in the region and in the implementation of the CCCT's Effective Trusteeship training program. It played a significant role in helping the Pacific institutions secure a Department of Interior grant that provides funding for professional and institutional development.
- In addition, the ACCJC responds to invitations from member institutions for consultation, training, and briefings on issues pertinent to the institution, which include various constituents across a campus and with varying degrees of confidentiality. Between 2010 and 2012, 30 individual meetings with colleges requesting assistance took place. The ACCJC does not make public information about this aspect of its work, but it can be found on our staff's calendars. (Discussion 3)

The task force report cites the development of AATs, California associate of arts degrees for transfer, and the pilot program for baccalaureate degrees in the California community colleges, as reasons why the community college system would benefit from a more formalized collaboration with other institutions of higher education, including service on evaluation teams. The ACCJC agrees and has promoted this concept for years. For example, the Accreditation Standards have promoted a greater focus on articulation agreements and transfer policies, as well as currency in curriculum, for more than a decade. The ACCJC has collaborated with the California State Chancellor's Office in development and implementation of AAT degrees, and in development and implementation of the baccalaureate degree pilot program. The ACCJC has served as a critical part of the communication loop for these initiatives with the USDE, and has participated in policy and implementation discussions of these efforts with representatives of four-year institutions and systems.

- Prior to receiving its current scope of USDE recognition, which includes independent accreditation of a baccalaureate degree, the ACCJC participated for about 10 years in the joint accreditation of member institutions' baccalaureate degrees with WASC Senior. That process included the effective accreditation practice of placing individuals with

baccalaureate expertise and experience on evaluation teams, along with team members with expertise in all other aspects of the community college mission. This practice has carried forward in the ACCJC's evaluation of the (now 15 pending) California community colleges seeking approval for new technical baccalaureate degree programs, as well as for Pacific Colleges implementing baccalaureate degrees important to their service area.

- Given the increased scrutiny of the U.S. peer evaluation system of accreditation, and criticism of its ability to ensure the academic quality of member institutions, it is important to stress the value of having commissioners and team members from peer institutions involved in accreditation reviews. Peers' understandings of the mission, challenges, and indicators of institutional effectiveness, and their interpretations and applications of standards to a community college when conducting evaluation reviews, all provide the needed support and credibility to our system. This in no way diminishes the importance for state systems and institutions to find additional formalized means of collaboration, just as regional accreditors and national accreditors collaborate on overlapping areas of practice and interest.

ACCJC Response to the Task Force Recommendation

The report recommends that the Chancellor's Office investigate all avenues for establishing a new model of accreditation, including a combined ACCJC and WASC Senior, having a different regional accreditor serve the community colleges, and exploring other types of accrediting agencies.

With all due respect to the work of the Task Force, it does not appear that the themes and findings from their work support the ultimate recommendation. The benefits of the current division between the community college accreditor and the university accreditor in the Western Region has been recognized and discussed for possible adoption by other accreditors. In fact, the practical implementation of accreditation practices in some of the regions includes such a division for all intents and purposes (from staff to evaluation teams and to decision-making body).

Moreover, as the recently completed Review of Accreditation Standards and Practices has shown, the ACCJC has embarked on an ambitious program of new accreditation practices, including continued alignment with other regional accreditors. The significant changes represent the ideas and recommendations from across the region and from multiple constituencies. The purposes of accreditation for colleges that remain at their core associate degree granting institutions are best served and the benefits are fully achieved in a system that involves knowledgeable peers from within the two-year segment of higher education.

ACCJC Response to the Nine Ideal Attributes of an Accrediting Organization in the Task Force Report

The Chancellor’s Office Task Force Report includes nine overarching themes that capture the areas in which the Task Force concluded greater ACCJC responsiveness was needed. They are addressed, briefly, below, along with facts to set the record straight about what ACCJC practice currently is. The ACCJC welcomes further dialog with the Task Force and with member institutions to fully understand the concerns and ways in which those concerns can be better addressed by ACCJC.

- A. **Task Force Ideal Attribute:** “The accreditor emphasizes improvement rather than compliance.”

“The accreditor remains focused on its core mission of ensuring institutional quality and improvement.”

ACCJC Response:

Accreditation is about both assuring quality – that is, compliance – and about improving institutional practices. The concept that compliance is something separate from improvement is contrary to accreditation practice.

“Compliance” with standards connotes a level of practice that aligns institutional practices and outcomes with expectations in higher education about academic quality and institutional effectiveness. Institutions engage in ongoing self-evaluation for the purpose of assuring quality and effectiveness, making regular adjustments and corrections in order to meet the expectations of standards. In this way, each institution also is able to align with the ongoing evolution of higher education practices.

Accreditation is **also** about quality improvement. Institutional improvement – represented by the continuous advancement of practice – occurs when institutions set goals for further advancement, to address future challenges, to apply new knowledge or theory to improving student outcomes and educational quality. These practices that are effective advance the whole endeavor of higher education.

As accreditation standards and policies evolve over time, they incorporate the better or more effective practices that the leading institutions demonstrate. Accreditation thereby draws all accredited institutions along in higher education’s collective progress toward improving quality. For example, “Program review” was a new concept in the early 1990’s. It is now a well-established practice, has proven to be useful to serving student and public interests, and has also been incorporated into national expectations for quality institutions. Assessment of student learning has followed a similar path to become mainstream practice.

The peer evaluation system of accreditation depends to a great extent upon an institution’s own practices of self-evaluation and continuous quality improvement. Evaluation teams provide external validation of the institution’s own efforts to maintain alignment with standards, and provide prompts and advice for further work when needed. The continued accreditation, and the reaffirmation of accreditation by the Commission, provides the public with the quality assurance they seek.

Much of the tenor and tone of accreditation is set by individual institutions, and their leadership at all levels, in the way they approach continuous self-evaluation and improvement, and the ways they use accreditation standards as guides to good and better practice. A critical principle found throughout the standards is that of continuous self-evaluation by accredited institutions. An accredited higher education institution is expected to demonstrate institutional commitment to quality through self-evaluation and through improving practices at any time they are found to fall short of the quality expectations. Accreditation standards are one of the measurement tools institutions can use to monitor their own practices. In addition, through institutions' own continuous quality improvement efforts, effective practices will be innovated, developed and further advanced. The model is one of progress and positive development, or improvement, in the context of the standards as voluntarily directed by institutions with periodic external verification.

Our system of accreditation, which depends upon voluntary self-regulation with a peer evaluation component, is under stress with rising expectations of what accreditors might be able to do or should be doing to address public concerns with higher education outcomes, and institutions feeling the pressure of increasing federal regulation through accreditation.

ACCJC's Quality Focus

With that said, the ACCJC recognized, during the 2012-2014 Review of Commission Standards and Practices, that there was the need to provide additional external early warnings for colleges whose practices in a few areas were falling out of alignment with standards. It also realized it could do more through accreditation to advance innovation and effective practices in all member institutions. The input from constituents across the region provided impetus for significant changes in policies and processes in these areas. These have been discussed in several ACCJC News articles, notices to the field, and in trainings. See the Spring/Summer 2015 edition of *ACCJC News* at <http://www.accjc.org/newsletter>

- B. **Task Force Ideal Attribute:** “The accreditor demonstrates collegiality and consistency in all of its actions with member institutions and constituent groups.”

“All institutions receive consistent and equitable treatment.”

ACCJC Response:

The ACCJC has a number of long-standing practices that are used to ensure that institutions receive consistent and equitable treatment:

- The processes for revision of Accreditation Standards and Commission policies ensure notice to the field and opportunities for input and suggestions prior to changes being enacted.
- Interim changes in practice or interpretation of standards or policies are communicated to the field in written notifications that set forth the changes and the reasons (regulatory shifts, etc.).
- Commissioner training, team chair training, institutional self-evaluation training, and multiple other presentations help to ensure that accreditation standards are interpreted consistently across all institutional reviews.

- Institutional leaders and ALOs relay questions and seek consultation throughout the review process as needed.
- During external evaluations, institutions may raise errors and issues with processes, including interpretation of standards.
- Due process steps throughout the process allow for issues to be addressed.
- When anomalies occur within an evaluation team’s review, the Commission makes necessary changes to ensure the standards are applied consistently and equitably.

Since the adoption of new standards in 2014, the ACCJC has held an Accreditation Standards Symposium, has posted cross-walked and annotated versions of the standards, and has conducted other trainings about the interpretation and application of standards. In addition, the ACCJC has announced plans to begin an additional level of team training, both for widening the available pool of evaluators and for increasing the preparation of team members for a pending visit.

Equity in accreditation does not mean lock-step application of standards. The conditions at an institution are evaluated by consistently interpreting and applying the standards in the context of the institution’s mission and conditions. The means by which an institution addresses the standards (for example, the terminology and methods for conducting institutional planning) may vary, and thus the evidence of meeting standards will vary. The peer evaluators apply the same standards, but the college conditions themselves, and the manner in which the college has chosen to describe and evidence those conditions, become the variables in the evaluation process.

The ACCJC in most instances shares the same level of information publicly about each member institution’s accredited status – the Commission action letter and the Evaluation Team Report. However, the level of information about an institution that is shared will vary in two situations, as required by federal regulations, as follows:

1. If an institution has received a sanction of Probation, has been placed on Show Cause, or has had accreditation denied or withdrawn, then additional information about the college’s review is required to be made available to the public by the accreditor.
2. If an institution has made representations concerning its accredited status, conditions at an institution in an accreditation review, or similar statements that are misleading or incorrect, the ACCJC must publish information to correct the misinformation.

Task Force Ideal Attribute: *“The accreditor avoids any actual or appearance of conflict of interest at all levels of the accreditation process.”*

ACCJC Response:

The ACCJC has a rigorous conflict of interest policy that applies to team members, ACCJC staff, Commissioners, trainers, and other representatives of the organization. In a recent recognition review, the former chief ethics counsel for the USDE advised that the ACCJC policy clearly met federal requirements and were equivalent to other accreditors’ conflicts policies. A recent lawsuit in California Superior Court examined both the policy and the ACCJC’s practices relative to the policy. The final ruling determined that there were no flaws in the ACCJC’s conflict of interest policy, and that there were no conflicts

or appearances of conflict in the ACCJC's practices relative to evaluation teams and evaluation processes.

Institutions are provided with a means to address possible conflicts of interest by proposed team members. While immediate action is taken, the level of public transparency is tempered. For example, a common conflict of interest is that a team member may have applied for a position at the institution being evaluated. While it is necessary to remove the individual from the team, there is no additional benefit to the public from knowing why the individual has been removed.

Commissioners are required to recuse themselves from matters in which they have a conflict or appearance of conflict. Records of commissioner involvement in team evaluations are kept to help ensure recusals based upon participation in teams. If a commissioner does not self-identify a conflict, then the conflict may be raised by another commissioner for consideration and recusal action by the Commission. There is also an additional conflict of interest policy for Appeals Hearing Panel members.

- C. **Task Force Ideal Attribute:** "Accreditation reports that indicate deficiencies include clear expectations for correction and allow reasonable opportunities for improvement."
"The accreditor clearly identifies deficiencies and their level of significance."

ACCJC Response:

In the Commission action letter following an institutional review, the institution is asked to refer to the evaluation team report for both identification of what the institution is doing effectively and for details about the deficiencies in policy, procedure, practice, or outcomes that led to not meeting a standard.

The Accreditation Standards do not weight particular standards over others. It is the impact of not meeting a standard on the conditions at a particular college that determines level of significance. The representation of significance is found in the allocation of a sanction and the level of sanction. The urgency is represented in the length of time given to fully address the deficiency.

Commission action letters quote the recommendations concerning deficiencies, as well as citing the standards involved. In a 2013 complaint, issue was raised with the term "recommendation." The complaint stated that since the word had a common usage, any special usage of the term in accreditation practice was not appropriate. In fact, terminology often carries special usage in certain contexts—and that is widely understood and accepted. In accreditation in the Western Region, the notification of standards for which college practices were found deficient, and the articulation of the peer advice for how to resolve the deficiencies is known as the recommendation.

Within the past several years, recommendations that were intended to strengthen practice (recommendations to improve) have become part of the accreditation lexicon as well. The USDE acknowledged and found acceptable the ACCJC term "recommendation", that has been in use for decades. With the separation of "recommendations to meet standards" from the newer "recommendations to improve practice," in action letters the USDE also determined these provided the required notifications to member institutions.

Colleges report to the Commission that the evaluation teams generally are correct in their conclusions and recommendations. The California State Auditor's report survey results concurred with this finding. When colleges are unsure exactly what the evaluation team report means, they are encouraged to call the ACCJC staff for a consultation, and many avail themselves of this opportunity.

Task Force Ideal Attribute: *"Sanctions are never an immediate or first response to deficiencies."*

ACCJC Response:

In a recent letter to the ACCJC, the USDE reiterated its position that in certain situations, no amount of time for remediation is appropriate. The risk to students and the public may be such that immediate action by an accreditor is needed. In those cases, the action might be termination, or it might be a foreshortened period of Show Cause, where the institution must immediately address the concerns and show why it should continue to remain accredited.

Sanctions themselves, including Warning and Probation, are never an immediate or first response to deficiencies. Instead, an institutional review looks at the college conditions to determine the impact of the deficiencies, level of severity, and urgency in resolving the issues. The Commission examines whether the institution's accredited status should be reaffirmed. Where there are deficiencies, the decision to issue a sanction is based upon a review of the college's situation and the appropriateness of applying a commission action, as each action is defined in policy. Reaffirmation of accreditation means an institution meets standards; there are specific operational definitions of each sanction as well.

A sanction is an indication given to an institution that its practices have slipped in one or more significant aspects relative to required standards of practice, and that the institution's self-evaluation processes have not resulted in correction of that slippage. Accreditation is continued during a period of sanction, and the expectation is that the institution will be able to address the noted deficiencies within the time period given. The sanction serves as external feedback to an accredited institution about the need for changes; sanctions are vital to motivating prompt institutional action in the identified areas of focus.

Show Cause is mandated when the areas of deficiency impact the ability for ACCJC to ensure the public that the institution meets the standards of quality. It provides a statement of urgency for the institution to reinstate appropriate policies, procedures, practices or outcomes within a limited amount of time. While the institution is given the short time frame, within limits set forth in federal regulations, there is not always an expectation that the institution has the capacity or will to address the noted deficiencies. The federal regulation that limits an accreditor's ability to extend a long period of time to an institution that is performing below standard has impacted institutions that do not or cannot "right the ship" quickly. The impact of this regulation is a topic worthy of public policy debate, but all accreditors and institutions currently have to abide by it.

During the Review of Standards and Practices, the ACCJC received requests from the field about ways in which to acknowledge high performing institutions, and ways to acknowledge the capacity of some member institutions to make needed corrections

expeditiously. As a result, the Commission's Policy on Commission Actions on Institutions was revised, including:

- Reaffirmation - Reaffirmation for the maximum accreditation term is now given to institutions that demonstrated no deficiencies in meeting standards.
- Reaffirmation with Follow-Up - Institutions with deficiencies that can be resolved in a short time and which do not put the institution at immediate risk can be given reaffirmation for a period generally up to 12 months but as long as 18 months, to resolve the issues. Upon demonstrating resolution, the institution will have reaffirmation for the remainder of the full cycle.
- Warning instead of Probation - Institutions that self-identify significant deficiencies and which take steps to address them can be given Warning, instead of Probation, during the period allocated for meeting the standards.

As discussed previously, through monitoring, the ACCJC provides informal notification to institutions about certain financial issues and issues dealing with student learning and achievement that are identified as the ACCJC reviews the institutions' Annual Report and Annual Fiscal Report. This feedback is intended to help an institution prevent conditions that may not adhere to Standards.

The role of the institution itself in early identification and resolution of issues related to accreditation standards cannot be overstated. The notifications for institutional use provided through the ACCJC's monitoring, and the public notices provided through external evaluations and Commission action letters, provide additional opportunities to relay information back to institutions when issues remain.

D. Task Force Ideal Attribute: "The accrediting process and accreditor actions and decisions are transparent."

"The accreditor seeks meaningful participation and input from member institutions and constituent groups before making decisions with regard to its policies and processes, including decisions on issues such as the development of new standards."

ACCJC Response:

The ACCJC welcomes input on standards, policies and practices on an ongoing basis. Because there is often the need for a change in institutional practice resulting from changes in standards and policies, there are processes for notification of proposed changes, periods for input, and further review before changes are adopted. For example, institutions were given 10 years to adopt practices to meet the (then new) 2002 standards requiring that student learning outcomes be identified and assessed, and that the assessments be used to improve practices.

In order to avoid constant shifts and changes, unless a particular change is needed sooner, revisions to standards are examined holistically within an announced period for Review of Standards – six years after standards are reviewed and adopted. When needed sooner, federal regulations require that changes to standards will happen within a year of when the need was determined (and following review and comment periods).

The ACCJC announced its most recent Review of Accreditation Standards and Practices in November 2011, and continued to solicit and receive input through June 2014. Requests for participation were sent out on multiple occasions and through various means

of communication. Oral input was received in six public hearings, and written input was received from individuals and groups. Members of the business community, students, faculty, staff, administrators, and governing board members were invited to provide input, along with other accreditors and governmental agencies. Notice to the public was posted for receipt of general input. Input was received from more than 500 individuals. Task forces were formed to ensure constituent input on finance, student learning, distance education, and other subjects. Higher education experts were asked to provide insight to the Commission about how higher education needs were changing and expectations were evolving. Presentations about proposed changes were made at conferences with faculty, chief instructional officers, institutional CEOs, and others.

All input that ACCJC received was considered or used in the development of revised standards and practices.

With regard to policy revisions, the ACCJC posts all proposed policy revisions as “first readings” within 30 days of a Commission meeting, and solicits comment from all parties interested through the ACCJC website, or any other vehicle the parties wish to use. The ACCJC accepts comment on policies at all times, and continually reviews its policies for change.

Task Force Ideal Attribute: *“Processes for appointment of commissioners, appointment of accreditor staff and leadership, and appointment of visiting team members are open, clear, and well defined and involve meaningful participation from member institutions.”*

ACCJC Response:

The ACCJC Commissioners are elected by the CEOs of member institutions rather than being appointed. The process was discussed above in more detail, including the role of member institution constituents in nominating and serving as commissioners.

Team member appointment is a staff function based upon identified protocols for pulling teams together. The priority in team selection is to assure the institution being evaluated that its team is competent, well trained, and can cover all the accreditation standards well, and that it is efficiently composed so that an institution is not paying the costs for participation for a team member that does not contribute significantly to the team’s work and the report provided to the college.

Not all institutions participate in accreditation by sending evaluation team members and helping them be able to leave their jobs for the time of the team visit. There is a role institutional leaders can play in helping faculty find coverage for their classes so that they can participate on evaluation teams.

In selecting team members, the ACCJC’s first purpose is to assure that the team members have the expertise, ability and will to perform the role of team evaluator using the standards and practices outlined by ACCJC in its manuals. The expertise of the team is critical to the receiving institution’s ability to receive an accurate peer evaluation report and sound recommendations for improvement. The expertise and efficiency of the team members affects costs to the institution, and is a factor in team selection.

Candidates for service on evaluation teams come from across the constituencies at member institutions. They can be nominated by their institutional CEO, self-nominated,

or may be encouraged to apply by someone who feels their qualifications are appropriate. Candidates have to fill out a biographical information form, and have expertise that prepares them to both be a special expert on a team (e.g., a financial management expert) and be able to participate well in a holistic evaluation of the institution. Writing, analytic and communication skills are requirements, as are computer and teamwork skills, and timely work completion. Personal commitment to the accreditation process and willingness to apply ACCJC standards to an institution's own practices are also requirements. College costs for reimbursing team expenses are kept to a minimum by choosing team members with broader, rather than highly narrow, professional expertise appropriate to the level of analysis that teams use.

Twice per year, the ACCJC constitutes approximately 12 comprehensive evaluation teams (average 12 members) and 10 follow-up or other special teams (2 members, on average). The approximately 175 members, including team chairs and assistants, are drawn from the team member database, taking into account availability for the particular evaluation period and expertise relative to the institution's type of review and issues under review. Colleges are asked to complete a survey on the team's work and may include comments about the team members' performance and the team chairs' performance. Each team chair is asked to evaluate team members and the team members are asked to evaluate the team chair. Evaluation data and Commissioner feedback on the quality of team reports are also used to assess strong evaluators and team members.

The ACCJC has attempted to draw primarily from experienced evaluators for the teams, limiting new members on comprehensive evaluation teams to about two, to ensure the college's external evaluation team experience is a strong one.

In response to offers from constituent groups to help with rebuilding the team member pool, and following suggestions received for better preparing team members to serve, team trainings will be revised starting in spring 2016. New (or interested) team members will be asked to attend a first-level team training, to become acquainted with the processes and protocols of team service. The second-level team training will be attended by teams together, and will be focused on preparing for the pending college on-site evaluation.

The significant majority of ACCJC staff, Commissioners and team members come directly from the member institutions and constituents represented there.

With regard to the hiring of ACCJC staff members, the ACCJC is a private, non-profit organization. Its elected commissioners, who represent constituencies of member institutions as well as the types and geographic distribution of ACCJC member institutions, hire the ACCJC CEO and elect the Chair and Vice Chair (Chair elect) of the Commission. The Presidential oversight, and evaluation is conducted by the elected Commissioners. At ACCJC, the three most recent Presidents have come out of the California public community colleges.

ACCJC staff are hired and supervised by the ACCJC President. The President reviews the evaluations of ACCJC training events and the evaluations completed by college CEOs as to the performance of staff and evaluators, and provides feedback and direction to the staff of the ACCJC. The professional staff members have community college faculty and administrative experience.

Task Force Ideal Attribute: *“Decisions regarding the accreditation status of individual institutions are discussed and decided with the involvement of all appropriate parties and based on documented evidence.”*

ACCJC Response:

The ACCJC undertakes each institutional review with great seriousness and with concern for the impact on the institution itself, its students, and the public. The Commission takes action on an institution based only on evidence of conditions at the college. This evidence will primarily come from the institutional report itself and from the evaluation team report. It may also include external reports (such as USDE Program Audits and FCMAT Reports), results of complaint investigations, and related items for which the college has had the opportunity to respond.

The Accreditation Standards provide that the CEO has the primary leadership role for accreditation, and that faculty, staff, and administrative leaders of the institution also have responsibility for assuring compliance with accreditation requirements. The institutional self-evaluation reports provide a written record of a process that included individuals from across the institution, and that accurately represents practices at every level. The report is signed by various leaders at the campus, who join with the CEO and governing board in attesting to effective participation in its preparation and to the accuracy of the institution’s presentation.

Each Commissioner is expected to review the documentation concerning each institution’s case on the agenda prior to arrival at the Commission meeting (Commissioners who are recused for conflict of interest do not read those cases or sit in during deliberations). Two or three commissioners are assigned to serve as readers for each case. They are charged with ensuring all Eligibility Requirements, Accreditation Standards, specified federal regulations and Commission policies are addressed, and with facilitating the Commission deliberations for that institution. The readers guide the formulation of the motion for Commission action, ensuring the accuracy of what is recorded by staff.

The Commission bases its decision on the evidence before it, including the factual observations of the team in its report. By federal law, the Commissioners are charged with making the decisions on accreditation independent of any recommendations from teams. Accreditors are required to train Commissioners and have processes for ensuring they apply standards fairly across institutions. Generally, the Commissioners rely heavily on the institution’s self-evaluation report and on the evaluation team report. However, if the team report contains conclusions that do not appear to be supported by the factual observations, or if the factual observations in various parts of the report appear to be in conflict with one another or with the conclusions, the team chair is alerted. Team chair concurrence is generally obtained in connection with any change to a team report. In addition, if a change is made from the team’s conclusions, that change is noted in a memorandum that is included with the team report, to ensure transparency and clarity.

The Commission decision on the accredited status of an institution is based largely on documentation of conditions at the college. However, institutional presidents are provided the opportunity to appear before the Commission and address particular issues orally. This presentation has been received confidentially by the Commission, though a few presidents have released their statements publicly after their appearances

Task Force Ideal Attribute: *“Records and evidence used in making decisions on accreditation status are shared in publicly available documents.”*

ACCJC Response:

As discussed above, the Commission bases its actions upon documentation provided by the college and by the team, with the addition of external audits and reports to which the college has had an opportunity to reply, if any. The one area in which other information becomes a part of the Commission’s consideration is when the CEO presents confidential oral comments to the Commission in closed session prior to its deliberations.

The bulk of the institutional reports used in making decisions on the accredited status of an institution are made public by an institution as per ACCJC policy. Certain documents, however, are proprietary to the institution and are not required to be public, including for example personnel and student-specific records used in the evaluation but otherwise covered by privacy laws, and financial or business information that is considered confidential. There is also information the USDE may direct the accreditor to keep confidential (or to keep confidential during the pendency of an investigation).

The ACCJC requirements related to public disclosure pertain to accreditation and its purposes. However, state and other governmental regulations provide broader guidelines for making certain additional information about higher education institutions public. Member institutions must follow the requirements of their authorizing governments, as well as the requirements of accreditation.

Task Force Ideal Attribute: *“A standard appeal process regarding issued sanctions exists.”*

ACCJC Response:

The ACCJC policies and procedures provide multiple opportunities for institutions to raise concerns during and about the accreditation process. The institutions can raise concerns about both processes and results, as applicable. The interaction between institutional CEO and ACCJC has often been informal—in the form of a telephone call or email message. (When a particular method of communication is required, it is noted below in parentheses.) The opportunities for raising issues, whether there is a sanction or not, include:

- Selection of the time of a visit.
- Proposed evaluation team membership.
- Before, during, and after the visit for any questions or concerns.
- During review of the draft team report for error of fact review. Note: This is important in that any sanctions would be based on deficiencies related to institutional policies, procedures, practices or outcomes noted in the factual observations of the team report or in the institution’s own report (and external reports and audits to which the institution has had the opportunity to provide response).
- Following review of the final team report (written remarks to the Commission).
- Before the Commission action (oral comments to the Commission).
- After receipt of the action letter.

When an institution is faced with a sanction and has 12 or 18 months in which to address the issues and resolve deficiencies, it may not be in the interests of the institution to use lengthy processes to appeal the decision because in responding to the Commission at its next scheduled review, the institution may be able to show the Commission it is meeting standards and its accreditation continues during the period in which it works to come into compliance with standards. The current opportunities to raise issues are designated in a way to be fair and to keep the process timely and to get the College's factual input, through its CEO, before the Commission takes action.

When the Commission action involves withdrawal or denial of accreditation, the institution also has:

- A request for the Commission to review its decision (in writing).
- An administrative appeal by an Appellate Hearing Panel (requested in writing).
- Restoration process (written request).

Federal regulations require that the process for appeal of a withdrawal of accreditation not take an inordinate amount of time because to do so will keep an inadequate institution operating. The process for appeal of withdrawal of accreditation, however, needs to take sufficient time to ensure the institution is afforded due process.

- E. **Task Force Ideal Attribute:** "The regional accreditor demonstrates and maintains consistency with federal accreditation mandates and regional accreditor peers."

"The accreditor implements and applies standards in a manner consistent with federal accreditation mandates and regional accreditor peers."

ACCJC Response:

The ACCJC has been in operation since the early 1960s, and has operated in good standing since that time. It achieved and has maintained its status as a U.S. recognized regional accreditor continuously without interruption since the federal recognition processes was instituted. The ACCJC implements and applies its standards in a manner consistent with federal accreditation mandates.

The federal law specifically acknowledges that recognized accreditors will have additional standards beyond what is dictated under federal regulations. The federal regulations pertain to matters deemed important by the USDE as they relate to overseeing the use of federal funds for student aid. Beyond those requirements, accreditors are stewards of the peer evaluation process of accreditation, and will have standards that relate to quality in higher education apart from, or in some cases to a degree higher than, required for federal student aid purposes.

In the past full cycle of recognition reviews, all seven regional accreditors were found out of compliance with federal regulations and were required to complete a one-year compliance report (numbers of noncompliance areas ranged from four to more than two dozen). The recognition of each of the regional accreditors was continued, but the findings of noncompliance were indicative of the changing interpretations and implementation of federal regulations. The implementation of a new regulatory interpretation brings with it an immediate effective date. Thus, at any given time, accreditors may be determined to be out of compliance even given that their practices were found compliant and affirmed in previous reviews. The noncompliance is noted

until the accreditor has changed in response to the new interpretation and has demonstrated implementation of the changes.

The ACCJC is an active member of C-RAC, the Council of Regional Accrediting Commissions. Working together with other regional accreditors, the ACCJC has joined in a number of mutually adopted policies, going back to the 1990s. In the past year, the regional accrediting commissions adopted uniform definitions of sanctions, and this informed the ACCJC revisions to its Policy on Commission Actions on Institutions. Following that, the commissions studied the terminology for the various reports and visits required between comprehensive evaluations. Following that study, the commissions determined the benefits to changing language was minimal, as the member institutions had become accustomed and acculturated to the language being used. Most recently, the regional accrediting commissions adopted a joint statement on credit by examination and a joint policy regarding the evaluation of competency based education, which were both informed by discussions with the USDE.

Cross-region studies of regional accreditation standards and policies have pointed to the great similarity that exists. Regional accreditors continue to work together on shared policies and practices, and have regular meetings and conference calls to do some of this work. Every two years, the professional staffs of all regional accreditors conduct joint professional development and problem solving conferences and plan future projects. These discussions and alignment projects will remain an integral part of the regional accreditation picture of the U.S.

- F. **Task Force Ideal Attribute:** “The accreditor provides quality training to commissioners, visiting team members, and member institutions that is inclusive of all groups involved in the accreditation process.”

“The accreditor includes all the various system constituent groups in the development of training activities and other assistance to institutions.”

ACCJC Response:

The ACCJC has gone out of its way to accept invitations for speaking engagements, workshops, and panels at conferences of constituent groups across the Western Region. The presentations include conferences for faculty, chief instructional officers, human resource officers, finance officers, trustees, CEOs, community college organizations, and regional organizations, among others. In addition, the ACCJC routinely accepts invitations from member institutions to conduct workshops at the institution.

ACCJC core trainings for institutions preparing for self-evaluation are attended by representatives from across the constituencies that are identified by the colleges. In the past year, in response to input from the field, the ACCJC has taken steps to begin holding an annual conference of its own, open to all constituents involved in the accreditation process. The conference is expected to take place in the 2016-2017 academic year. A multi-constituency advisory committee has met a few times to help with the preliminary planning for the annual conference.

Task Force Ideal Attribute: *“The composition of visiting teams includes equitable representation of the various constituencies within the system.”*

ACCJC Response:

The idea of “representatives within the system” is not clear to ACCJC, but it is important to note that ACCJC serves many kinds of colleges in several different governmental jurisdictions. Accreditation is a professional peer evaluation system – it relies on academic expertise to examine elements of educational quality and support, and it relies on persons with administrative expertise to examine organizational practices and policies relative to the standards. Thus, team’s draw from such constituency groups from member institutions.

In a study of composition of visiting teams across regional accreditors, the ACCJC was surprised to learn that there is no general expectation that evaluation teams include faculty members. Some accreditors will include a faculty member on a team, but not consistently. The reason for this is that team members for a regional accreditor have a significant time commitment and must use expertise to evaluate an institution across multiple areas of operation. Ideally, the individual will have had experiences at more than one institution and in multiple positions. For example, chief instructional officers will have academic credentials and be familiar with the instructional aspects of institutional practice across multiple programs, and they will often have experience with policy, budget, planning, hiring, and so forth. A faculty member will have expertise within the discipline, and possible experience in instructional aspects of institutional practice such as curriculum design, delivery of distance education, articulation, assignment of credit for courses, and other academic matters, but may not have broader experience in their institution or at others. The accreditor seeks to find individuals with multiple areas of expertise to lend to the team.

The ACCJC, collaborating with the statewide academic senate, identified as an effective practice the inclusion of faculty on comprehensive evaluation teams. As a guide, it was agreed that a team should have three faculty members (“faculty” as defined by the individual’s campus) on a team. For a 12-person team, this would provide faculty representation of 25%. While there is no federal requirement that there be faculty on a team (although federal regulations do require representation of "academics" on teams), the ACCJC agreed there were multiple reasons why this was an effective practice. As a downside, there is the possibility that teams will have to be somewhat larger than would otherwise be the case, but the positives outweigh the downside of team size: the opportunity for collegial exchange, for leadership development, and for deeper examination of instructional and educational support practices, to name a few.

In addition to faculty, teams include researchers, CEOs, administrative VPs, chief instructional officers, finance officers, student services professionals, occasional trustees and others. Again, team members with broad experience across multiple aspects of institutional practice are sought. Multi-college district personnel are included.

- G. **Task Force Ideal Attribute:** “The accreditor is responsive to and collaborates with CCC constituent groups.”

“The accreditor is responsive to all institutional representatives and system constituent groups, not merely to the college presidents of member institutions, and works with the various system constituent groups to resolve issues and concerns.”

ACCJC Response:

As previously discussed in several sections above, district and college CEOs are among the individuals who make up the ACCJC’s Commission, along with faculty and members of the public. Teams and individuals who attend ACCJC trainings include individuals across constituencies. Input on policies and standards are sought across constituencies, including students, and from the public. The *ACCJC News* and the ACCJC website are designed to provide information for any interested parties.

The ACCJC receives inquiries on issues and concerns on a regular basis. These often come from individuals or from representatives of groups representing constituencies beyond simply CEOs. The ACCJC works to provide information, refer inquirers to appropriate parties, and address concerns as these matters come forward.

In its formal relations with the member institution, the ACCJC has to identify the means by which the institution communicates with the accreditor. That designation is in most cases, by policy, through the CEO. The ALOs also have specific roles in accreditation and serve as necessary as adjunct to the role of the CEO.

The CEO (and the ALO, as appointed by the CEO) is charged with ensuring that information about accreditation and accreditation activities are communicated widely across constituencies, and also that opportunities for input are shared widely. An effective institution is informed about accreditation and active in accreditation.

- H. **Task Force Ideal Attribute:** “The accreditor respects the roles and responsibilities of college and system constituent groups.”

“The accreditor remains within its purview and stated purpose and respects boundaries established by state law and regulation regarding the roles and responsibilities of all constituent groups.”

ACCJC Response:

As mentioned in other sections above, the ACCJC interacts on a regular basis with constituents across the college and participates in discussions with constituent groups on areas of interest, and in conferences and meetings.

The ACCJC’s purview includes all areas of institutional practice and how the practices exemplify academic quality and institutional effectiveness. While state laws may set forth legal roles and responsibilities of particular constituents, the accreditation standards generally set forth expectations for the institution as a whole. Where particular constituencies are mentioned in standards, those are reflective of quality expectations in higher education.

The accreditation standards require participation across the institution in many areas of policy, planning, and practice. The principles of quality require the informed participation

and appropriate roles for staff, faculty, administration, and students, in the institutional self-evaluation and improvement processes, and the sharing of certain information across the campus and with the public. The ACCJC respects the roles of constituencies across its member institutions.

ACCJC standards operate fully within the boundaries of law. Accreditation standards and policies will commonly set forth higher requirements than those set out in state laws. This is because the laws determine baseline requirements for authorization to operate or to qualify for state funding. Accreditation standards express quality expectations that move beyond the ability of an institution to operate. Participation in federal student aid programs is discretionary on the part of higher education institutions, and thus federal requirements may be higher than those in state law as well. As complex organizations, institutions must operate within many requirements related to funding, professional practices (e.g., generally accepted accounting practices), licensing and programmatic accrediting agencies, and so on. In its contracts, policies, and organizational practices, the institution maintains practices in accordance with accreditation standards and all of these other criteria and rules, so as to maintain authorizations, compliance, and quality expectations.

- I. **Task Force Ideal Attribute:** “Member institutions have a formal process for periodic evaluation of the accreditor.”

“The accreditor provides a pathway for open, candid feedback about commission policies, processes and staff.”

ACCJC Response:

The ACCJC has regular, formal processes for receiving open, candid feedback. The Commission’s comprehensive review of standards occurs every six years and is open. Commission policies are reviewed on a continual basis and input is sought whenever there are proposed changes or additions; a first and second readings process and announcements of draft changes provide opportunity for input.

Team evaluation processes and team leadership are evaluated by the team and by the institution, team chairs are evaluated by team members, and training programs are evaluated by participants. The Commission, comprised of individuals elected by member institutions, conducts a self-evaluation every two years, and evaluates the ACCJC President annually. The President is responsible for evaluation of the seven full-time and one part-time staff, and reporting on staff to the Commission’s Executive Committee. The evaluation of accreditation activities becomes a part of the evaluations of ACCJC staff. Member institutions provide feedback on ACCJC trainings and other feedback that informs the assessment of staff performance.

Task Force Ideal Attribute: *“The periodic evaluation of the accreditor extends to all aspects of the accreditor’s performance, including but not limited to organizational leadership and decision-making processes.”*

ACCJC Response:

The Commission’s practices, including organizational leadership and decision-making processes, are an overt part of the periodic review process, which happens every six years in accordance with policy. The most recent Review of Standards and Practices was conducted from 2012 to 2014.

In addition, the elected Commissioners evaluate the functioning of the Commission, of ACCJC staff, of office activities, and overall accreditation performance every two years. The sources of their information include performance data and feedback from participants on the various instruments the Commission uses to collect this information.

Task Force Ideal Attribute: *“The accreditor responds to findings of the formal evaluation in a prompt, thorough, and meaningful way.”*

ACCJC Response:

Since mid-2013, the ACCJC has been publishing information about its responses to the input received from the Review of Standards and Practices. Most recently, the ACCJC published two significant articles in the *ACCJC News* about new practices being implemented beginning in spring 2016.

As noted in sections above, multiple changes have happened to improve or correct practices, including:

- Posting of annotated standards and cross-walked standards; holding an Accreditation Standards Symposium.
- Creating two tiers of team training.
- Implementing an ACCJC annual conference with the advice of a multi-constituency advisory committee.

In addition, ACCJC standards and policies have been revised to provide greater transparency and clarity, and to address input related to sanctions and other critical areas.

The new practices will be subject to evaluation and input, just as the previous practices were, and will be revised as a part of the ACCJC continuous improvement cycle.