A Preliminary Report to the Accrediting Commission for Community and Junior Colleges

Developed and Submitted by
Workgroup I:
Improving ACCJC Structure, Function, and Relations

On behalf of
Chief Executive Officers of the
California Community Colleges

June 8, 2016

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INTRODUCTION

This document stems from a desire on the part of California Community College Chief Executive Officers (CEOs) to be more involved and to partner with the Accrediting Commission for Community and Junior Colleges (ACCJC/Commission) to improve the accreditation process. CEOs join the ACCJC in the strong belief in peer review and support of the requirement for quality and rigor in all facets of the colleges and their accreditation reviews.

On March 13-15, 2016, CEOs representing more than 100 California community colleges and districts participated in a CEO symposium in Yosemite. The symposium offered the opportunity for CEOs to discuss issues important to them with the majority of the time devoted to a thoughtful, in-depth conversation on accreditation. In an effort to inform the conversation, CEOs were provided with the *2016 Accreditation Implementation Task Force* report in advance of the meeting. Panel members for the accreditation discussion personally made phone calls to each CEO prior to the meeting to determine how best to engage them in the session in order to have a productive and meaningful discussion.

From this discussion, two workgroups were established to 1) address the assessment of accreditation issues and 2) formulate recommendations for change to the Commission. Workgroup descriptions follow.

Workgroup I: Improving ACCJC Structure, Function, and Relations

Goal: Work with ACCJC commissioners to immediately undertake significant improvements in the structure and functioning of the Commission to address long-standing concerns of its members, giving special attention to the concerns noted by the U.S. Department of Education requiring compliance by October 2016.

Membership: Consists of California Community College CEOs, one representing each CEO Board region; one CEO from an ACCJC-member private college; the president and vice president of the Academic Senate for California Community Colleges; accreditation liaison officers (ALOs); and representatives from the WASC Senior College and University Commission. Though invited to participate, no representatives from the Western Pacific community colleges nor the University of Hawaii Community Colleges did so.

Workgroup II: Western Region Higher Education Accrediting Model Long-Range

Goal: Facilitate communication between representatives of regional accreditors and institutional members from various sectors of higher education to pursue a model for regional accreditation that aligns all segments of higher education in the Western region. (*At the time of this writing, Workgroup II had held one meeting; their work will take more time to complete*.)

This report represents the culmination of the work of Workgroup I. It outlines a future direction for the colleges and the Commission, whereby, working in concert, the accreditation process for all member colleges of ACCJC will be strengthened.

The report begins with an Executive Summary highlighting five key areas of focus identified by California Community College CEOs with a brief description of current practices and resulting recommendations.

The remainder of the report provides more in-depth detail with rationales and supporting documentation for the recommendations as well as policies and practices of other regional accreditors.

In order to present the most useful recommendations to the Commission, the workgroup consulted with CEOs across the system, surveyed recent visiting team chairs and team participants, gathered information from ALOs, and researched processes and practices of regional accrediting agencies nationwide. The recommendations contained in this report are, therefore, the products of many voices and are supported by relevant and current research.

Based on this project and the resulting document, the members of Workgroup I are confident the accreditation process will become more participatory and more valuable and less burdensome for all participants. Most important, these reforms will refocus the accreditation process on how well the institutions serve students and other meaningful measures of quality.

EXECUTIVE SUMMARY

In order to address long-standing issues with the current accreditation process, members of Workgroup I (see Appendix A.1), convened on behalf of the CEOs of the California Community Colleges, identified five key "areas of focus" of the accreditation process needing improvement and produced a series of companion recommendations for each area. Representatives from University of Hawaii Community Colleges and the Western Pacific Community Colleges were invited to participate in the project but declined the offer. As members of the ACCJC, the individuals undertaking this work are motivated by the desire to partner with ACCJC to improve current processes, to aid colleges in obtaining the technical assistance needed to meet the Accreditation Standards, and ultimately to improve student learning.

The following summary highlights current Commission practices by key areas of focus with CEO recommendations that are the result of CEO feedback from across the Western region, surveys of visiting team chairs and members, information collected from Accreditation Liaison Officers (ALOs), and review of nationwide regional accrediting agency practices. Included in this report are additional supporting documentation for each of the areas of focus, the recommendations, the rationale and evidence and resource references to support the recommendations.

A. AREAS OF FOCUS I: TRAINING AND SELECTION

1. Visiting Team Chair Training

   Current training for team chairs covers a great deal of information in a conversational manner. Participants are "walked" through a binder that contains material on a variety of important topics, all of which are not covered in the allotted time. The training is not structured in a way that best prepares participants for the leadership required to conduct a successful visit.

   Compounding the problem is that for a variety of reasons, team chairs are often selected at the last minute and receive training by phone or one-on-one. There is no online training option. Often times documents are sent late and, again, for a variety of reasons, team members are not assigned in a timely manner or are changed late in the process, making planning for the visit very difficult for the chair.

   Summary of Key Recommendations

   Staff visiting teams at least 8 weeks prior to the site visit, and distribute training documents to the visiting team chair within 3-4 weeks prior to the training. Enhance the visiting team chair training and learning experience by requiring the online review of training module toolkits reviewing the basics prior to the two-day onsite training. The two-day training should include experienced team chairs joining the group on the second day to lead more focused and interactive training experiences. Assign experienced chairs with new chairs and allow for more one-on-one or small group focused and directed chair to chair training. Following the training, assign new chairs to "shadow" experienced chairs prior to a college visit. Where feasible, assign two CEOs to each team, one to serve as chair, and the other to shadow and serve as back up in case of an emergency. Make mentoring the new CEO a team chair responsibility. Include and review a crosswalk of USDE changes and resource documents, and a review of "how-to" read and evaluate a self-study report. After the accreditation process is completed, the Commissioners and staff who read the team report should evaluate it and share feedback with the chair about what did (and didn't) work. If, as recommended in *Area of Focus IV: Process and Structure*, the final ACCJC report is to be

shared with the visiting team chair, provide training on how to send the final Commission approved report and action letter to the visiting team.

2. Team Member Selection

Currently, prospective accreditation team member applications are reviewed and approved by the CEO and sent to the Commission. The team member selection process lacks consistency with some individuals regularly assigned site visits while others are not selected for years. There are concerns that team members are selected in light of perceived issues at the college rather than a representational membership.

Summary of Key Recommendations

The process to select team members must be standardized to ensure greater consistency and to improve transparency. Develop team selection guidelines specifically for CEOs to ensure reliable team member selection practices. A website link should be made available that informs prospective members about the role of a peer evaluator and a process that allows and encourages volunteers to sign up online.

3. Team Member Training

Although some recent changes have been implemented in the visiting team training, further improvements are needed. Currently, training is conducted only by ACCJC personnel in a face-to-face format as a global overview of all standards. The sessions are large and include experienced and new team members without taking advantage of the expertise that experienced team members bring to the group. The training offers little information on methods to gather and evaluate evidence, and instead appears to emphasize "catching" colleges doing wrong or being out of compliance. There does not seem to be sufficient attention paid to the importance of objectivity in the evaluation process. Further, there is little emphasis on team member behavior during the visit, the types of questions to ask during the campus interviews, and visiting team members' engagement with college staff.

Summary of Key Recommendations

With a goal of ensuring that visiting team members are keenly aware of their respective roles and responsibilities, their training should include online course modules on accreditation basics similar to those developed by the Southern Association of Schools and Colleges Commission on Colleges (SASCOC). Topics should include the following: institutional effectiveness; instruction and instructional support services; human, technology, physical, and financial resources; leadership; and governance. Efforts should be made to invite experienced CEOs and ALOs to join ACCJC staff for the onsite training. Training time would be more effectively utilized by allowing visiting team members to engage in case scenarios that demonstrate that the standards can be met by a variety of creative methods and are not dependent upon solitary and limiting practices. Another technique may be the sharing of self-evaluation reports that both do and do not meet the accreditation standards. Colleges should be encouraged to meet the standards by instituting a variety of practices and processes that best serve their students. Emphasize that the accreditation process honors and values the peer evaluation process that should result in improvement rather than solely identifying compliance problems and issuing sanctions. Provide exercises to ensure "inter-rater reliability" so that the site visit results are similar regardless of the composition of the team or chair. Further, the training of team participants should include visiting team member etiquette and protocols, offer smaller

group settings during the training session, and permit and encourage written inquiries ensuring that visiting team members have an opportunity to ask questions and receive answers.

B. AREA OF FOCUS II: COMMUNICATION

CEOs are concerned with the tone, timing and quantity of communications with the Commission. This is confounding because interpersonal communication with the Commissioners and staff is often collegial and effective. In addition, there are few mechanisms to keep ACCJC's various constituents engaged and informed of matters of importance in a structured, consistent, objective manner that is sensitive to the effect of such communications on the health and wellbeing of member colleges. The goal is to help the Commission's external perception match the personal experience some have had with the individuals who make up the Commission and the staff.

Summary of Key Recommendations

All communications from ACCJC should feature a collegial tone and be disseminated to the field with adequate time for review. Avoid sending multiple notices with short time frames; instead provide a systematic summary of correspondence on a quarterly or semi-annual schedule. Improve the ACCJC website to ensure transparency. Develop and publish a strategic plan or standing rules to provide transparency and involve the field an opportunity to be involved in the future direction of the Commission. Allow face-to-face meetings on issues of significance to member institutions. Sponsor an annual conference for all constituencies and, among the presentations, provide training on federal and other entities that have an impact on Commission operations, such as the U.S. Department of Education. Improve overall communication by issuing member surveys of services and trends that have an impact on regional accreditation; distributing quarterly newsletters and best practice examples; hosting/encouraging regional discussions about higher education and accreditation; and increasing contact between the ACCJC President and Vice Presidents/Liaisons and institutional CEOs and ALOs.

C. AREA OF FOCUS III: EVALUATION

ACCJC does not have a comprehensive evaluation process that involves participation of member institutions. Input from stakeholders is periodically solicited on issues such as a revision of standards and other matters, but member institutions do not take part in evaluation of the Commission operations, services, or staff.

Summary of Key Recommendations

Create a comprehensive process of evaluation of the Commission, involving input and participation from member institutions. The process should include feedback solicited from ACCJC constituents participating in Commission processes, events, and interacting with ACCJC personnel. Surveys should solicit feedback based on the experiences, perceptions and satisfaction of the constituents. The results of evaluation findings should be used to update and revise Commission's policies, procedures, and templates; develop/implement Commission's strategic plan; inform the work of various committees; plan Commission staff and retreats; develop an annual budget; inform annual evaluation of the Commission president and Commission staff; modify/enhance training and professional development activities offered by the Commission; and share the evaluation results as deemed appropriate.

D. AREAS OF FOCUS IV: PROCESS AND STRUCTURE OF THE VISIT

1. Institutional Self Evaluation Report (ISER)

Colleges spend an inordinate amount of time crafting the Institutional Self Evaluation Report (ISER) and collecting evidence that demonstrates compliance with the Standards. Each college adopts its own structure for writing the report, but most consist of multi-member constituency-based teams assigned to Standards with a final editor to ensure the self-evaluation reads cohesively. Colleges are not always aware of criteria for structuring the report or citing and indexing evidence, so formatting can vary across colleges. For colleges in multi-college districts, there are different levels of collaboration across institutions on assessing the effectiveness of any shared functions and district services. Reports have grown in size because colleges feel the need to protect the institution by including copious amounts of detail that can result in long and repetitive reports. Depending on the governance structure at each college, the writing may start as early as two years before the anticipated accreditation visit to provide time for institutional and governing board review and approval of the report.

Trustees, CEOs, and ALOs are critical to the development of the ISER and often are not knowledgeable about the accreditation process to ensure appropriate development of the document and the subsequent preparation for the site visit. No formal, required training is offered for CEOs or trustees at this time. Trustees and CEOs receive information about accreditation through sessions at Community College League of California or State Chancellor's Office conferences or when they take it upon themselves to invite the ACCJC CEO to a board meeting to offer training. ALO training is offered but not required; many ALOs have never served on a visiting team.

Summary of Key Recommendations

Examine and compare the format, content, and length of the ISER in contrast to other regional accreditors. Provide clear guidelines and technical assistance to assist colleges in preparing the ISER with the necessary evidence for the visiting team. Include additional guidelines for multi-college districts. Reevaluate the focus and name of the Institutional Self Evaluation Report to align with supporting institutional commitment and improvements. Require CEOs to participate in accreditation training two years prior to a visit to the institution for which they serve as CEO. Appoint CEOs to serve in a secondary role on a visiting team at least once in his/her first three years as a CEO and, if successful in that role, as chair within the next three years as CEO. Provide one-day training annually for newly-elected trustees in December or January and for all trustees two years prior to a visit to the college for which they serve as trustee. Require training for ALOs with a focus on the development of the ISER and require ALOs to serve as a peer evaluator.

2. Pre-Visit

The Team Chair Manual clearly describes what should be covered in the "in-person" pre-visit to the college by listing (1) the intended outcomes, (2) topics for discussion; (3) and logistical matters to be arranged for the team. That information is covered well in the training, and visiting team chairs have the opportunity to engage in a discussion on related details. However, the pre-visit does not include a discussion of the ISER.

The pre-visit sets the stage for the subsequent activities. When the chair and team members are selected well in advance of the visit and the college Institutional Self Evaluation Report

(ISER) is completed and distributed in a timely manner, the pre-visit is meaningful, and not rushed for the team. However, there are instances when the chair and/or team members have not been selected prior to the pre-visit and/or the ISER is incomplete and/or has not been submitted in a timely manner. In such instances, the entire process does not begin smoothly.

Summary of Key Recommendations

Ensure that all teams are staffed and that the team chair has thoroughly reviewed the ISER prior to the pre-visit. Expand the "intended outcomes" to include a substantive review of the ISER. The review could result in a discussion of questions raised about the ISER and areas of improvement from the point of view of the visiting team. The team should give preliminary feedback to the institution before the scheduled team visit which is usually a few weeks after the pre-visit. This will provide adequate time for the institution to respond to major deficiencies and send a positive message about the intentions of the team. Give the chair flexibility to include other team members on the pre-visit, especially a team member who has concerns about weaknesses in the report. ACCJC staff should thoroughly prepare the college for the visit so that each knows what to expect at every stage of the process. Consider adopting pre-visit practices from other Commissions that allow the colleges more flexibility and time for focusing on critical issues, and assistance that will make a difference in student learning.

3. Site Visit

Currently, the site visit takes place over four days, typically on a Monday through Thursday schedule. A considerable amount of work is done prior to the visit by college employees, the Commission staff, and visiting team members. Those four days on the college campus and/or at the district office, in the case of multi-college districts, are filled with activity with considerable time spent by team members in the team room at the campus or in the hotel, poring over documents, interviewing people, and writing in order to determine whether the college meets the Standards. The chair makes formal remarks at various stages of the visit and meets with the CEO and others throughout the visit. There is no attempt during the visit to resolve any compliance issues, nor is there any discussion between the president, the team chair, and the Commission.

Summary of Key Recommendations

Simplify the site visit. The present structure requires the team to "prove" that the college meets every standard and substandard. Consider using a structure similar to other accreditors: one visit (virtual or in-person) that focuses on issues of compliance (pre-visit team); and another visit that focuses on improvement. Apprise the chair of all oral presentations that have to be made and provide talking points or a script so that remarks are consistent and the chair says only what is appropriate. Oral presentations include opening remarks at the beginning of the visit; remarks to commence the open forum; and the exit interview report. Consider increasing the team visit by one day so that the team has time to deliberate and an opportunity to have discussions with the CEO and other college personnel regarding the findings. Add a formal collegial exit meeting with the leadership team of the college or district to discuss preliminary findings so that the college is aware of deficiencies while the team is there and given an opportunity to clear up any issues. Carefully review practices of other Commissions, and consider adopting practices that would improve effectiveness of ACCJC practices.

4. Post-Visit

A considerable amount of the work involved in the process is completed by the end of the site

visit. However, work continues for the chair and team members at the conclusion of the visit. The team chair has to use the Standard reports to develop the Evaluation Team Report into a comprehensive and coherent document. The Team Chair Manual gives very clear directions on the writing of the Report, especially in formulating and finalizing the recommendations. In finalizing the report, the team chair shares the report electronically with team members to ensure accuracy and with the assigned Commission staff liaison who provides assistance to the chair as needed. Once the report is completed and is accepted by the liaison, the chair sends the report to the college being evaluated to determine whether there are errors of fact in the report. After the exchange with the CEO of the evaluated college, the chair's work is done unless s/he is invited to the Commission meeting at which the reports are reviewed. There is limited interaction among the college, the team chair and ACCJC staff once the team report is submitted to the Commission.

Summary of Key Recommendation

Provide an opportunity for dialog and discussion beyond the limit set forth by the "errors of fact" review of the document by the college under review. Create an opportunity for discussion together among the team chair, ACCJC staff, and the college CEO or ALO throughout the process rather than at only particular points. Share the final Commission-approved report and the ACCJC action letter with the visiting team chair for distribution and discussion with the visiting team to close the loop on the visit. Share the rationale for any changes to the team's recommendations with the chair. Provide an opportunity for the team chair, the institution's leadership team, and ACCJC staff to review and discuss the final decision of the Commission. Provide verbal or written feedback to the team chair on his/her performance and the performance of the team in the spirit of continuous improvement. Give CEOs and college personnel sufficient time at the Commission meeting to provide a response to the team report. (Commissioners need to be mindful of their tone with members who address the Commission.)

5. <u>Substantive Change Report</u>

Under current practice, colleges are spending significant time and resources on accreditation reporting requirements such as Substantive Change Reports. ACCJC has continued to expand substantive reporting with very few guidelines to help clarify the need for the added documentation.

Summary of key recommendations

Streamline preparation of Substantive Change Reports by limiting information requested and providing a template developed with input from member institutions and a review of approaches used by other regional accreditors.

6. <u>Annual Report/Workload</u>

Colleges are spending significant time and resources on Annual Reports. Annual reporting has expanded in recent years to include narratives about learning outcomes and other information not commonly collected in other regions.

Summary of Key Recommendations

Limit annual reporting to basic data and provide an electronic reporting system.

E. AREAS OF FOCUS V: COMMISSION OPERATIONS

1. Financial Transparency

   The ACCJC membership struggles with understanding the organization's finances, particularly in light of increases in dues and fees. For the past two years, members have received a supplemental bill with virtually no detail or explanation. Commission membership should be reviewed in order to provide additional expertise and balance in order to better support the decision-making process.

   Summary of Key Recommendations

   In conjunction with ACCJC's Annual Conference (beginning 2017), schedule a CEO Forum open to all members. Include a presentation on ACCJC's finances, present and planned, without disadvantaging it in its legal or confidential matters. The legal bills that are crippling the financial and operational capacity of the Commission should be communicated transparently to both Commissioners and the membership to aid them in evaluating whether the strategy to address ongoing litigation is prudent and sustainable. The goal of the Forum is to provide clear information for the CEOs to use in their campus planning, budgeting and communication needs. Additionally, providing this information will improve the financial transparency of the Commission.

2. Commission Size and Composition

   At this time, the ACCJC is comprised of 19 Commissioners representing 10 offices and constituencies. While the size and composition of other regional accreditors varies, no other regional accrediting commission includes representation from K-12 education. There are currently three ACCJC Commissioner vacancies and opportunities to redefine Commission representation to include constituents with specific expertise and balance in order to better support the decision-making process is warranted. Adding a Chief Financial Officer representative would provide the necessary expertise to address issues described under financial transparency.

   Summary of Key Recommendations

   Re-define the configuration of Commission representation by deleting the ACS/WASC and Affiliate Members categories and using those positions in a different way. Shift the ACSCU/WASC Commissioner position to *ex officio* non-voting status and have that position serve as a liaison to the Senior Commission, providing reports and communication to the Commission. To maintain the Commission at 19 voting members, one additional member and the three deleted constituency seats will be reallocated as follows: create a Chief Financial Officer (CFO) category, with a minimum of two allocated Commissioners, active or retired. Allocate any remaining seats among existing constituencies. The Commission should request any reports from ACSCU/WASC to be delivered as part of the public session of ACCJC meetings.

3. Nominating Committee

   The Nominating Committee plays a crucial role for the ACCJC. The most recent election cycle for Commissioners has been the subject of much frustration and confusion among member CEOs. The process—as implemented—can create the impression of secrecy and gives a strong advantage to the slate of candidates proposed by the Nominating Committee. The slate excluding qualified candidates gives the impression that the only qualified candidates are those included in the slate. Given the current environment of controversy and skepticism, the Commission should take immediate steps to ensure that the election process is fair and

transparent in both appearance and fact. The Nominating Committee's function to identify individuals who are broadly representative of the size and geographic diversity of the member institutions must be transparent and consistent in selecting well-qualified applicants.

Summary of Key Recommendations

The overarching goal of the recommendations is to promote consistency and transparency in the nomination process and to increase the number of desirable applications for service on the Commission. Specific proposed recommendations require a change in the bylaws; examples as to how the recommendations can be incorporated into the relevant sections of the ACCJC Bylaws are included in the supporting documentation.

Specifically, ACCJC should redefine Commission representation in order to ensure Chief Financial Officer participation. A clear charge and statement for the Nominating Committee should be developed and disseminated. Marketing materials should be developed to provide clear expectations of Commissioner, length of term, number of meetings per year and anticipated time commitment. The number of individuals who count ballots should be specified and include one Commissioner, at a minimum.

Additional supporting documentation for each area of focus with a description of current practice, recommendations, resource documents and applicable ACCJC bylaw amendments is included in the next section of this document.

AREAS OF FOCUS SUPPORTING DOCUMENTATION

The following templates provide detailed rationale and documentation to support recommendations within each area of focus outlined in the executive summary.

A. Areas of Focus I

Training and Selection

1. **Visiting Team Chair Training**
2. **Team Member Selection and Team Member Training**

1. VISITING TEAM CHAIR TRAINING

CURRENT STATUS

Current training for team chairs covers a great deal of information in a conversational manner. Participants are "walked" through a binder that contains material on a variety of important topics, all of which are not covered in the allotted time. The training is not structured in a way that best prepares participants for the leadership required to conduct a successful visit.

Compounding the problem is that for a variety of reasons, team chairs are often selected at the last minute and receive training by phone or one-on-one. There is no online training option. Often times documents are sent late and, again, for a variety of reasons, team members are not assigned in a timely manner or are changed late in the process, making planning for the visit very difficult for the chair.

RECOMMENDATIONS

The following recommendations are offered to enhance the current training for visiting team chairs and thereby improve the experience for all persons involved in the visit process.

Prior to Face-to-Face Training

1. Staff visiting teams at least 8 weeks prior to the visit.
2. Whenever feasible, assign two CEOs to each team, one to serve as chair and another to shadow and serve as back up in case of emergency. Make mentoring the new CEO a team chair responsibility.
3. Develop toolkits and online training modules, including a crosswalk regarding USDE financial responsibilities and samples of well-written sections for reference.
4. Require visiting team members to complete online course modules on the accreditation basics similar to those developed by SACSCOC. Topics should include changes to standards; Eligibility Requirements; Commission policies; USDE Checklist; institutional effectiveness; instruction and instructional support services; human, technology, physical, and financial resources; and leadership and governance, etc.
5. Distribute training documents to chairs 3-4 weeks prior to training so that chairs can review the documents and prepare questions for the training session.
6. Give chairs an assignment, requiring no more than 30 to 60 minutes to complete, due ahead of chair training. This could be as simple as drafting an assignment of duties plan for team members based on their bios or responding in writing on how the chair would handle a difficult scenario during the team visit. Discussion of the assignment will become a training exercise.

Face-to-Face Training

7. Require new visiting team chairs to attend a two-day training with experienced visiting team chairs joining on the second day for more focused and interactive training. This training should be co-taught by an experienced team chair and an ACCJC Commissioner or staff member.
8. Include the following topics/strategies in the training:
    - philosophy of accreditation with an emphasis on providing assistance to the colleges in those areas in need of improvement;
    - activity that ostensibly takes the visiting team chairs through the sequence of the visit using examples of letters and forms (provided both in hard copy and on flash drive) that visiting team chairs must complete;

- writing good external evaluation reports to include samples of good external evaluation reports, good Quality Focus Essays, and organization and components required;
- case studies demonstrating how to:
  (a) handle team personnel issues such as a non- responsive team member,
  (b) handle on-campus conflicts that occur during the visit,
  (c) analyze standards and link evidence to standards,
  (d) work with the CEO and others (e.g., board members, union leadership, academic senate) at the college to be visited,
  (e) read/use the self-evaluation and other college materials in conducting the visit,
  (f) hold team members accountable for their respective work product,
  (g) divide the labor among team members, and
  (h) effectively use the questions linked to each Standard in the *ACCJC 2015 Guide to Evaluating & Improving Institutions* exercises to ensure "inter-rater reliability" tied to evidence so that the results would be at least very similar regardless of team makeup or chair.

9. Include in the training a session in which experienced team chairs meet with 1-2 newer team chairs in small groups to provide space for conversations on lessons learned from their prior experiences.
10. Following the training, assign new chairs to "shadow" experienced chairs prior to a college visit.
11. If the recommendation in *Area of Focus IV: Process and Structure* to share the approved report with the visiting chair is accepted, train the chairs on sending the final Commission-approved report and action letter to the visiting team with reflections about what worked and did not work.
12. Repeat this sequence or training for visiting team chairs every fourth visit to ensure that the visiting team chairs are up-to-date on the Commission's standards and philosophy.

RATIONALE AND EVIDENCE

The current training may serve as adequate refresher for experienced team chairs, but a more structured training is required both because there are many new team chairs being trained, and some useful information has never been included. In order to have fair and consistent visits, the Commission needs to ensure that chairs have the necessary knowledge about standards and policies as well as guidance in writing reports and recommendations. They also need assistance in recognizing and handling any issues concerning team members. All chair training should be developed and presented in keeping with the philosophy that visiting teams assist the Commission and the colleges in ensuring that member institutions meet accreditation standards.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
ACCJC Publications	To be determined
SACSCOC Training Program: http://www.sacscoc.org/Training.asp	
https://www.wascsenior.org/resources-for-teams and https://www.wascsenior.org/evaluatortraining	
https://www.wascsenior.org/content/team-chair-roles-and-responsibilities	
Northwest Commission on Colleges and Universities http://www.nwccu.org/	

2. TEAM MEMBER SELECTION AND TEAM MEMBER TRAINING

CURRENT STATUS

Team Member Selection

An application to serve on an ACCJC accreditation team is approved by the CEO and sent to the Commission. Selection to serve on a team is inconsistently applied with some individuals being selected regularly and frequently while others not selected for years. There have been concerns that team members are chosen in light of perceived issues at the college rather than a representational membership.

Team Member Training

Although some changes have been made in team training recently, there is room for improvement. The current training is conducted by only ACCJC personnel, is conducted in a face-to-face format, and provides only a global overview of all standards. Further, the sessions are very large and include experienced and new team members without taking advantage of the expertise that experienced team members bring to the group. Such an environment can be intimidating to new team members who often will not ask questions because they feel intimidated. The training sessions include little information on evidence, seem to emphasize "catching" colleges doing wrong or being out of compliance, and do not give enough attention to the importance of objectivity in the evaluation process. Further, there is little emphasis on appropriate behavior during the visit, including the types of questions to ask and the amount of interaction team members should have with college employees. In summary, the training in its current form does not adequately prepare the team members for the amount of work that needs to be accomplished before and during the visit.

RECOMMENDATIONS

Team Member Selection

1. Standardize the selection of team members by ACCJC for consistency and improve transparency.
2. Provide guidelines to the field and especially the CEOs for recommending college faculty and administrators for ACCJC assignments.
3. Create a mechanism whereby volunteers sign up online.
4. Outline the criteria for service as a peer evaluator.

Team Member Training

The goal of the following recommendations is to improve the current training so that visiting team members are keenly aware of their role and responsibilities and are prepared for what they encounter prior to, during and after service on a visiting team. Overall, any training should emphasize collaboration for improvement rather than compliance and sanctions.

Prior to Face-to-Face Training

1. Require visiting team members to complete online course modules on the accreditation basics similar to those developed by SACSCOC. Modules should be developed based on areas of focus and peer evaluators required to complete only those applicable to their assignment and those required for all team members. Areas of focus should include institutional effectiveness; academic; student services; human resources, technology, finance; governance, the Quality Focus Essay, etc.

Face-to-Face Training

1. Include CEOs and ALOs who are experienced team leads and team members as presenters at the training sessions along with ACCJC personnel.

2. Use training time more effectively by allowing time for teams to do specific exercises to begin the preparation for the visit.
3. Provide focused training on each standard with examples, and make the training available online.
4. Emphasize the need for team members to recognize that colleges can meet the standards in a variety of ways, not that they must conform to any particular way of meeting the standards.
5. Emphasize that the accreditation process honors and values the peer evaluation process that should result in improvement rather than solely identifying compliance problems and issuing sanctions.
6. Provide exercises to ensure "inter-rater reliability" so that the results would be at least very similar regardless of team makeup (or chair).
7. Include samples of evidence that demonstrate meeting/not meeting standards. Use standards that appear to be a problem for most colleges.
8. Include site protocol training, i.e., how to conduct one's self as a team member, including the time commitment before, during and after the visit.
9. Include tips from experienced chairs and team members about the work that can (and should) be completed prior to the visit so that the visit is successful.
10. Conduct face-to-face training in smaller groups. This may require an increase in staff capacity and/or the use of experienced team chairs as trainers to ensure more training opportunities.

RATIONALE AND EVIDENCE

Team Member Selection

Currently, there is a lack of transparency and consistency in how team members are selected. Some individuals are regularly and frequently called for service while others submit an application without being called or called years after submission. The process should be standardized so that there is some level of predictability and inclusiveness in the selection. Additionally, guidelines for CEOs may be necessary when recommending faculty, staff and administrators to serve on ACCJC visiting teams. There appears to be inconsistency in application of the process.

Middle States Association of Colleges and Schools (MSACS) has a policy for the selection of peer evaluators. Parts may prove helpful. It appears that the MSCHE chooses the peer evaluators. Volunteers sign up through the website and fill out an application. The selection of peer evaluators is based on criteria outlined in the Selection of Peer Evaluators guidelines:
http://www.msche.org/documents/SelectionofPeerEvaluatorsGuidelines103012.pdf

Brochure link to volunteer: http://www.msche.org/publications/VolunteerBrochure201314Version.pdf

New England Association of Schools and Colleges state the following as their policy:
"The Commission maintains an active file of about 1,000 evaluators who participate in the evaluation and consultative activities of the Commission. These individuals are usually recommended by the heads of institutions, colleagues who have themselves participated in the evaluation process, Commission members, and the Commission staff."
https://cihe.neasc.org/downloads/POLICIES/Pp66_Selection_of_Chairpersons_and_Evaluators.pdf

Team Member Training

In order to be adequately prepared to serve as an effective peer reviewer, a comprehensive training program with more than one day of training is a must. Other commissions provide training options in different modalities for visiting team members. These options provide a model from which ACCJC can benefit. The following comment by a recent participant in training supports the need for improvements. Links are provided below for the types of training offered by other commissions.

Survey comment: "… the team training is repetitive and less than inspiring, and remains too focused on PowerPoint slides. For me, the greatest value of the team training is: 1) time to begin to get to know the other team members and 2) time to begin discussing the Self Evaluation. Too little time is allocated for either of those. I wonder if much of the required training content could be moved to a REQUIRED online tool prior to the training so that more time could be focused on team building and discussion of the ISER."	
TEAM MEMBER SELECTION SOURCE DOCUMENTS	**ACCJC BYLAW AMENDMENT REQUIRED**
MSCHE Selection of Peer Evaluators	To be determined
NEASC Selection of Chairpersons and Evaluators	
MSCHE Volunteer Brochure	
TEAM MEMBER TRAINING SOURCE DOCUMENTS	**ACCJC BYLAW AMENDMENT REQUIRED**
ACCJC Publications	To be determined
SACSCOC Training Program : http://www.sacscoc.org/Training.asp	
https://www.wascsenior.org/resources-for-teams and https://www.wascsenior.org/evaluatortraining	
https://www.wascsenior.org/content/team-chair-roles-and-responsibilities	
Northwest Commission on Colleges and Universities http://www.nwccu.org	

B. Area of Focus II

Communication

COMMUNICATION

CURRENT STATUS

CEOs are concerned with the tone, timing and quantity of official communications with the Commission. This is confounding, because interpersonal communication with Commissioners and staff is often collegial and effective. In addition, there are few mechanisms to keep ACCJC's various constituents engaged and informed of matters of importance in a structured, consistent, objective manner that is sensitive to the effect of such communications on the health and wellbeing of member colleges. The goal is to help the Commission's external perception match the personal experience some have had with the individuals who make up the Commission and the staff.

RECOMMENDATIONS

The following recommendations are offered in a spirit support and cooperation in order to open the lines of communication and strengthen the relationship between ACCJC and its constituents, recognizing that some of the issues may be due to a heavy workload on the Commission's very small staff.

1. Create more collegial formal communication – recognition of effort, particularly of faculty and staff.
2. Provide time for the field to review documents.
3. Avoid sending out multiple notices in short time frames. Provide systematic summary of correspondence (quarterly or semi-annually).
4. Provide regular (at least semi-annually) summaries of correspondence.
5. Improve ACCJC website to ensure transparency.
6. Provide support for institutions that are seeking guidance on meeting the standards.
7. Develop and publish a strategic plan or standing rules in order to provide transparency for the Commission and give the field a chance to be involved in the future direction of the Commission.
8. Allow for face to face meetings on issues of significance to member institutions.
9. Sponsor an annual conference for all constituencies and, among other presentations, provide training on federal and other entities that have an impact on Commission operations, such as the U.S. Department of Education. Such sessions would aid in educating the membership and remove barriers to communication and create a more supportive and collegial environment.
10. Improve communication with institutions through the following mechanisms:
    a. membership surveys on services, trends impacting regional accreditation;
    b. quarterly newsletters, including best practice examples;
    c. regional discussions about higher education and accreditation; and
    d. increased contact between the ACCJC President and Vice Presidents/Liaisons and institutional CEOs and Accreditation Liaison Officers. *(Extracted from HLC's strategic plan)*

RATIONALE AND EVIDENCE

Communication is the cornerstone of the relationship between the Commission and its members, so it is critical that both individual and official communications are positive and constructive. The following statements provide rationale and evidence to support the recommendations made above.

1. We recognize that the ACCJC is required to issue language that enforces federal regulations. While CEOs know this, there is likely a lack of understanding of the specifics of what those requirements are. More training would likely help alleviate any lack of clarity. Similarly, the Commission seems reluctant to offer any sort of congratulatory statement. For example, the 2013 midterm letters close with this statement:

   > *On behalf of the Commission, I wish to express continuing interest in the institution's educational quality and students' success. Professional self-regulation is the most effective means of assuring integrity, effectiveness, and educational quality.*

A statement "on behalf of the Commission" could acknowledge the effort made by faculty, staff, students and administrators to successfully meet the standards. The statement above leaves the impression that the Commission is chastising the institution.

2. The timing of important correspondence often comes with little time to respond. For example, On March 9, 2016, the Commission announced a webinar titled *Changing Accreditation: Consequences and Fact Checking*. The webinar was to be conducted on March 10 and 11. Many CEOs did not even open the email until the weekend (March 12) and the event was not recorded so that it could be viewed asynchronously. The content of the announcement was completely contained within an attachment – the text of that message could have been provided in the email body as well and likely would have facilitated further participation.
3. Correspondence often comes in spurts. From December 18, 2015, to January 27, 2016, the only correspondence from the Commission was a January 19 announcement of the USDE decision on the ACCJC appeal (without attaching the actual decision). From January 28 to February 5, the field received seven messages from the Commission.
4. The ACCJC website is difficult to navigate and seems to be missing key pieces of information (most notably, a calendar of meeting times) that would be helpful to institutions.
5. Provide support for institutions that are seeking guidance on meeting the standards. Institutions understand the importance of meeting the standards but do not feel like there is guidance available from the ACCJC. The development of California's Institutional Effectiveness Partnership Initiative (IEPI) provides a model that could be used to address issues related to the standards in a non-punitive manner.
6. The Commission does not have a strategic plan. This would allow the Commission to use the bylaws as incorporation articles. Research shows that other Commissions have strategic plans and standing rules. The Higher Learning Commission includes communication in its Strategic Direction to *Increase HLC's Value to Members through quality assurance and advancement* (HLC 2010).
7. Member institutions should be able to meet with ACCJC staff and Commission subgroups or task forces on issues of general concern. It seems that the Commission believes that meeting with a small group, particularly from one state, creates an issue for the Commission scope that includes Hawaii, the Pacific Islands and private institutions. The conversation regarding baccalaureate degrees provides an example. Efforts to meet with Commission staff were not accepted, but rather a webinar was created for the entire membership to view. This type of communication creates the appearance, if not a reality, of one-way communication that does not value the input of member institutions. Correspondence was exchanged between members of the field and the Commission between April 13, 2016, and May 13, 2016, when an in person meeting could have resolved the issue quickly and, perhaps, been more collegial. Four pieces of correspondence are included for reference in Appendix B.
    - Appendix B.1: March 8, 2016 – A letter from Dr. Norval Wellsfry, ACCJC, to California Community College Board of Governors President, Mr. Geoffrey Baum. Briefly, the letter describes that the "…Baccalaureate Degree Pilot Program Handbook (Handbook) is not aligned with ACCJC standards and may not meet the requirements for federal Title IV financial aid funds for students enrolled in the baccalaureate programs."
    - Appendix B.2: April 13, 2016 – A letter from Dr. Robert Simpson, President, Cypress College, to Dr. Norval Wellsfry, ACCJC regarding the March 8th letter. Dr. Simpson describes a process whereby participating colleges collaborated with ACCJC, the Academic Senate for California Community Colleges, and the Chancellor's Office in the development of the Handbook. Dr. Robert Simpson requests a meeting of all relevant stakeholders.

- Appendix B.3: April 13 and April 14, 2016 – Letters from community college presidents participating in the baccalaureate degree program to Dr. Norval Wellsfry, supporting the issues addressed in Dr. Robert Simpson's letter of April 13, 2016, and his request to meet with the Commission.
- Appendix B.4: May 13, 2016 – A letter from Dr. Norval Wellsfry, ACCJC, to Dr. Robert Simpson acknowledging receipt of the April 13, 2016, letter with mention that the Policy Committee had considered it. Dr. Wellsfry offers to meet by conference call and indicates that the "Policy Committee has now adopted the final language… and concerned individuals are advised to attend the Commission's open session to voice concerns directly to the Commissioners." Also included in Appendix B.4 are the Eastern Florida State College Faculty Qualifications and California Code of Regulations, Title 5, Section 40500. Bachelor of Arts: Required Curriculum.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
2013 Reaffirmation Letter to Allan Hancock College	Given that the bylaws are the incorporation articles, it is believed that the Commission could increase transparency by adopting standing rules as found in SACSCOC or developing a strategic plan similar to those found at WASC Senior and HLC.
SACSCOC Standing Rules	
WASC Senior Strategic Plan and WASC Senior Website	
SACSCOC Disclosure Rules	
NWCCU letter to North Idaho College – Reaffirmation	
HLC Strategic Directions	
Correspondence with ACCJC regarding minimum qualifications for BA degrees	

C. Area of Focus III

Evaluation

EVALUATION

CURRENT STATUS

ACCJC does not have a comprehensive evaluation process that involves participation of member institutions. Input from stakeholders is periodically solicited on issues such as a revision of standards and other matters, but member institutions do not take part in evaluation of the Commission operations, services, or staff.

RECOMMENDATIONS

1. Create a comprehensive process for evaluation of the Commission involving input and participation from member institutions. The process should include feedback solicited from ACCJC constituents participating in Commission processes, events, and interacting with ACCJC personnel. Surveys should solicit feedback based on the experiences, perceptions and satisfaction of the constituents.
2. Use evaluation findings for the following purposes:
    a. update/revise Commission's policies, procedures, and templates;
    b. develop/implement Commission's strategic plan;
    c. inform the work of various committees;
    d. plan Commission staff and other retreats as well as staff and Commission meetings;
    e. develop annual budget;
    f. inform annual evaluation of the Commission president and Commission staff; and
    g. modify/enhance training and professional development activities offered by the Commission.
    h. Share evaluation results as appropriate.

RATIONALE AND EVIDENCE

In order to work more effectively in partnership with its member colleges, various aspects of ACCJC's operations should be evaluated on a regular basis and the feedback used for continuous improvement. This is in line with the continuous improvement expectations for member colleges. By routinely collecting and reviewing information from the field about the Commission's operations, it will be able to identify areas of strength/quality and areas of weakness/improvement.

Two other regional accreditors, the **Southern Association of Colleges** and **Schools and the Higher Learning Commission**, have established evaluation processes for their operations. Other regional accreditors may have processes for gathering input from member institutions but do not perform a formal evaluation.

The SACS process appears to be the most complete and detailed model currently available. SACS regularly administers a number of questionnaires that seek feedback from various constituencies regarding their experiences, perceptions, and satisfaction with SACS key processes, events, and personnel. These surveys are listed below.

1. Institutions
    a. Post-Reaffirmation survey (CEO and Accreditation Liaison – administered after completion of the decennial review) - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=145442541641
    b. Confidential Staff Evaluation Survey (CEO and Accreditation Liaison – after each visit) http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=143886916582

2. Peer Evaluation Committees (all committee members, including Committee Chairs)
    a. Off-Site Reaffirmation Committees (Spring/Fall) - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=144587918383

b. On-Site Reaffirmation Committees (Spring/Fall) - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=146194275598

3. Professional development event attendees (all attendees –after each event, ~5,500)
    a. Annual Meeting (including Leadership Team Orientations) - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=144499798778
    b. Summer Institute - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=143559992890
    c. Small College Initiative - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=146038200247
    d. Pre-applicant Workshop - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=144301307367

4. Evaluator Training Session participants (all participants – after each session)
    a. New Trustees Orientation - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=146169796343
    b. Chair Training - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=145692524931
    c. Committee Member Training – http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=145070602669
    d. Evaluator training web-based modules - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=142383462759

5. Commission staff (all administrative and support staff members - annually)
    a. Annual evaluation of the Commission President - http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=143135848616

In addition, Commission seeks feedback from member institutions through special topic surveys as well as focus groups such as the following:

- ***Principles of Accreditation*** **Review Survey (2016) (open) -** http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=145554778777
- **Commission Website Survey (2015) (CEOs and Accreditation Liaisons) -** http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=143517283718
- **Survey of Chief Financial Officers (2014) (CFOs) -** http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=139163080102
- **Commission Templates Survey (2012) -** http://survey.sacscoc.org/snapwebhost/surveypreview.asp?k=134617735655
- **Focus Groups**
- **Commission Website** (2015 Summer Institute)
- **Decennial Reaffirmation Process** (2012 Summer Institute and Annual Meeting)

6. Highlights of evaluation findings are shared in the following manners:
    - President's *State of the Commission* address delivered at the closing plenary session of the SACSCOC Annual Meetings
    - President's updates at the SACSCOC Board of Trustees and Executive Council meetings
    - Monthly Commission staff meetings
    - Staff sessions at various meetings and advisory visits to institutions

- Online postings. E.g.,
- Commission's Strategic Plan - http://www.sacscoc.org/SACSCOCStrategicPlan.asp
- Non-compliance statistics – e.g., http://www.sacscoc.org/Research/Most%20Frequently%20Cited%20Principles_2014_Track_A_B.pdf

7. The Higher Learning Commission regularly solicits feedback from member institutions, peer reviewers, and other stakeholders as part of their evaluation process. The HLC policy on evaluation can be found here: http://policy.hlcommission.org/Policy-Adoption-and-Review/review-of-institutional-accreditation-policies.html. The policy reads as follows:

   Number: PPAR.A.10.030
   "The Commission, through its system of self-evaluation, will regularly seek from affiliated institutions and Peer Reviewers comment on the effectiveness of the Commission's policies, programs and activities. The Commission's review process will provide opportunities for a broad group of stakeholders, such as employers, students, parents, business leaders, etc., to evaluate the program and requirements for accreditation. The feedback from the stakeholders may lead the Board of Trustees to modify or change the Commission's programs and requirements in response to these ongoing systems of evaluation. In addition, the Board of Trustees will convene an advisory panel at least every five years to review the effectiveness of, and proposed changes and programs for, accreditation. The panel will include representatives from various constituencies within the Commission as well as members of the Board of Trustees. Should the Board of Trustees learn from its review of policies that a change in Commission policy is necessary to ensure that the policy is being interpreted properly by institutions or peer reviewers or is being properly applied in the evaluation process, the Board will ensure that such change is made within no more than 12 months of the Board learning about the necessary change."

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
Northwest Commission on Colleges and Universities http://www.nwccu.org/	To be determined
SACSCOC	

D. Areas of Focus IV

Process and Structure of the Visit

1. **Institutional Self Evaluation Report**
2. **Pre-Visit**
3. **Site visit**
4. **Post-Visit**
5. **Substantive Change Report**
6. **Annual Report/Workload**

1. INSITUTIONAL SELF EVALUATION REPORT

CURRENT STATUS

Colleges spend an inordinate amount of time crafting the Institutional Self Evaluation Report (ISER) and collecting evidence that demonstrates compliance with the Standards. Each college adopts its own structure for writing the report, but most consist of multi-member constituency-based teams separated by Standard or subarea with a final editor to ensure the self-evaluation reads cohesively. There are no criteria for structuring the report or citing and indexing evidence, so formatting varies across colleges. For colleges in multi-college districts, there are different levels of collaboration across institutions on assessing the effectiveness of any shared functions and district services. Reports have grown in size because colleges feel the need to protect the institution by including copious amounts of detail that can result in long and repetitive evaluations. Depending on the governance structure at each college, the writing may start as early as two years before the anticipated accreditation visit to provide time for institutional and governing board review and approval of the report.

Trustees, CEOs, and ALOs are critical to the development of the ISER and often are not knowledgeable about the accreditation process to ensure appropriate development of the document and the subsequent preparation for the site visit. No formal, required training is offered for CEOs or trustees at this time. Trustees and CEOs receive information about accreditation through offerings at Community College League of California or State Chancellor's Office conferences or when they take it upon themselves to invite the ACCJC CEO to a board meeting to offer training. ALO training is offered but not required; many ALOs have never served on a visiting team.

RECOMMENDATIONS

1. Examine the format, content, and length of the ISER.
2. Provide clear guidelines and technical assistance to assist colleges in preparing the ISER with the necessary evidence for the visiting team. Include additional guidelines for multi-college districts.
3. Reevaluate the focus and name of the ISER to align with supporting institutional commitment and improvements.
4. Require CEOs to participate in accreditation training two years prior to a visit to the institution for which they serve as CEO.
5. Appoint CEOs to serve in a secondary role on a visiting team at least once in his/her first three years as a CEO and, if successful in that role, as chair within the next three years as CEO.
6. Provide one-day training annually for newly-elected trustees in December or January and for all trustees two years prior to a visit to the college for which they serve as trustee.
7. Require training for ALOs with a focus on the development of the ISER and require ALOs to serve as a peer evaluator.

RATIONALE AND EVIDENCE

The goal of the Institutional Self Evaluation Report (ISER) is to provide the External Evaluation Team and the Commission with a clear articulation of a college's self-assessment on its compliance with the Standards and areas for continued improvement. Despite the time devoted by colleges to writing and gaining appropriate approvals for the ISER, team chairs state that the reports are oftentimes unfocused, lengthy and incomplete. It can also be hard to assess the efficacy of district administrative support services in multi-college districts if there are conflicting reports across the individual colleges. This makes it difficult for visiting teams to clearly evaluate how colleges meet or exceed the Standards and puts more pressure on the site visit for documenting evidence of compliance and validating what is written in the report. Further complicating matters, the length of time between writing the ISER and the site visit often requires colleges to write an addendum on the progress to date, requiring more work for both the colleges and the

visiting teams. It should also be noted that colleges assert that between self-evaluation reports, midterm reports, and follow-up reports, there seems to be a consistent focus on compliance related reporting versus institutional improvement.

Feedback from Team Chairs and CEOs that participated in spring 2016 site visits support changes to the current Institutional Self Evaluation Report format.

- "Reporting has become a full-time job. I'm doing something for ACCJC all the time."
- "Simplify the Self-Evaluation; use a template. It's too lengthy. It's insane to require a document that takes two years to write. The standards are still redundant."
- "2014 changes have had little positive impact; OFE is confusing; 18 month reaffirmation will just require more reporting."

Practices from other commissions in this area offer much more effective ways streamlining the ISER and focusing on institutional improvement.

WASC Senior
WASC Senior is silent on Self Study. However, the institutional report is limited to 75-100 pages. WASC Senior provides a library of sample reports.

New England Association of Schools and Colleges (NEASC)
For the NEASC, the narrative portion of the Self Study is limited to 100 pages. NEASC provides the following guidelines for the Self Study document in the Self Study Guide.

"Following this format allows the institution to show concisely how it evaluates itself today and plans for the future.

Description. A realistic and objective presentation of the present status of the institution with respect to each standard. The team and the Commission need a comprehensive understanding of how the institution operates. Concise summaries are most effective; extensive details can be provided in workroom documents.

Appraisal. A thorough analysis and evaluation of institutional practices in a given area, recognizing both achievements and areas for improvement. It should include sufficient evidence so that the reader understands the basis on which the evaluation has been made. This critical and candid self-judgment forms the single most significant internal activity in the entire self-study process. It requires deliberation and critical thinking. The visiting team and the Commission will pay particular attention to the judgments made in the Appraisal section, for these provide insight into the internal planning and management of the institution's resources to achieve its objectives. Equally important, the Appraisal section demonstrates the accuracy of the institution's self- image and its integrity in identifying areas for improvement.

Projection. Specific, realistic institutional commitments to maintain and enhance strengths and to address areas of concern. In accordance with the Commission's overall view that self-study is inextricably linked to planning, projections are expected to be part of the institution's planning process and represent concrete commitments over the next several years."

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)
SACSCOC requires two reports: Compliance Certification, which is reviewed by the Off-Site Committee and

the Quality Enhancement Plan (QEP), which is reviewed by the On-Site Committee. It appears that the Compliance Certification is similar to the current ACCJC Self Evaluation Report. SACSCOC does provide templates for some standards to help streamline and standardize the reporting process.

Middle States Association of Colleges and Schools (MSACS)
Middle States is proposing a change in process that may be adapted to ACCJC:
"A Self-Study and Evaluation Team Visit that will include a separate document review to confirm that the institution meets the Standards, freeing the Self-Study Report to focus more directly on institutional initiatives and improvements (a current Comprehensive Self-Study Report must address compliance with the Standards as well as institutional improvements, making the report lengthy, complicated, and often of limited use for institutional improvement)."

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
SACSCOC Handbook for Institutions Seeking Reaffirmation	To be determined
WASC Senior Resources of Institutions	
MSCHE Proposed Change Memo	
NEASC Self Study Guide 2013	

2. PRE-VISIT

CURRENT STATUS

The Team Chair Manual clearly describes what should be covered in the "in-person" pre-visit to the college by listing (1) the intended outcomes, (2) topics for discussion; (3) and logistical matters to be arranged for the team. That information is covered well in the training, and visiting team chairs have the opportunity to engage in a discussion on related details. However, the pre-visit does not include a discussion of the ISER.

The pre-visit sets the stage for the subsequent activities. When the chair and team members are selected well in advance of the visit and the college Institutional Self Evaluation Report (ISER) is completed and distributed in a timely manner, the pre-visit is meaningful, and not rushed for the team. However, there are instances when the chair and/or team members have not been selected prior to the pre-visit and/or the ISER is incomplete and/or has not been submitted in a timely manner. In such instances, the entire process does not begin smoothly.

RECOMMENDATIONS

1. Ensure that all teams are staffed and that the team chair has thoroughly reviewed the ISER prior to the pre-visit.
2. Expand the "intended outcomes" to include a substantive review of the ISER. The review could result in a discussion of questions raised about the ISER and areas of improvement from the point of view of the visiting team. The team should give preliminary feedback to the institution well-before the scheduled team visit which is usually a few weeks after the pre-visit. This will provide sufficient time for the institution to respond to major deficiencies and send a positive message about the intentions of the team.
3. Give the chair flexibility to include other team members on the pre-visit, especially a team member who has concerns about weaknesses in the report.
4. ACCJC staff should thoroughly prepare the college for the visit so that each knows what to expect at every stage of the process.
5. Consider adopting pre-visit practices from other Commissions that allow the colleges more flexibility and time for focusing on weightier issues, and assistance that will make a difference in student learning as indicated in the Rationale and Evidence section below.

RATIONALE AND EVIDENCE

As evidenced by the processes used by other regional accreditors, the pre-visit should be used to focus the subsequent visit on areas of concern and/or more critical standards. By doing so, the visiting team avoids hasty or uninformed conclusions since they have a smaller number of standards to actively investigate. Similarly, the visit will be less of a "scattershot" approach in which team members scramble to gather evidence for every substandard and have little time to discuss or deeply consider what the college has accomplished. A focus determined during the pre-visit will also alleviate much of the stress and uncertainty that a visit creates, and the institution will more adequately prepare based on the areas identified.

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

SACSCOC establishes two committees: Onsite and Offsite. The Offsite Committee reviews basic compliance issues and presents findings to the institution. They institution may submit a *Focused Report* in response. The Onsite Committee reviews the Offsite Committee's work but their primary role is to review the institution's Quality Enhancement Plan (QEP). According to SACSCOC: "while many aspects of the accreditation process focus on the past and the present, the QEP is "forward-looking" and thus transforms the process into an ongoing activity rather than an episodic event."

It would appear that much of the preliminary "compliance" type of work is preformed well-before the site

visit. Ample opportunity is provided to correct issues so that the site visit team can review the institution's QEP. The length of visit and the number of team members varies based on preliminary findings.

WASC-Senior
The overall process for WASC-Senior appears to be similar and includes an off-site or preliminary review for which lines of inquiry are established.

Middle States Association of Colleges and Schools (MSACS)
MSACS is proposing a change in process that might also serve as a model for the pre-visit:

"Approximately six to nine months prior to the site visit, an off-site documentation review is conducted. The institution submits documentation and an annotated documentation roadmap indicating the ways in which the submitted documentation demonstrates that the institution continues to meet the Requirements of Affiliation and Standards for Accreditation. A group of volunteer peer evaluators reviews the institution's documentation and documentation roadmap and submits a report on its review to the institution and the Commission. For each Standard, the evaluators determine that either (1) there appear to be issues that should be clarified by the team during the on-site visit; or (2) there do not appear to be any such issues.

The institution has the opportunity to address in its final Self-Study Report and during the team visit the areas identified by the off-site review for clarification or verification. At least one of the off-site documentation peer evaluators will be a member of the onsite visiting team."

New England Association of Schools and Colleges (NEASC)
Excerpts from the Evaluation Manual:

"Approximately two years before a scheduled comprehensive site visit or eighteen months before a focused visit, the Commission staff reminds the institution of the evaluation and asks that it select the specific dates for the team visit."

"At the beginning of the preliminary visit, the chair meets with the president to discuss the status of the institution's self-study report and review the steps ahead, including those taking place before, during and after the visiting team's presence on campus. The chair should also discuss with the president the arrangements for a meeting with members of the board of trustees at some time during a comprehensive evaluation visit. This meeting is also an opportunity for the president and team chair to discuss the format for the exit report discussed later in this section. For future guidance, the chair should get from the president names of key people on the campus who, in addition to those in line and staff positions, should be seen by team members."

"At the meeting with the president, as well as at any meetings scheduled with other members of the campus community, the chair should endeavor to develop a clear impression of the institution to lean how it is organized and to sense its atmosphere and style so that later the team can approach the evaluation visit with a minimum of lost time. Since one of the purposes of the preliminary visit is for the chair to come to an understanding of the institution's goals for the evaluation, the chair should have conversations with those who can contribute to increasing that understanding."

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
SACSCOC Team Evaluator Manual	To be determined
WASC Senior - Spring 2016 Team Evaluator Manual	
CEO, Team and Chair Surveys, ALO Surveys	
MSACC Team Evaluator Manual	
NEASC Evaluation Manual	

3. SITE VISIT

CURRENT STATUS

The current site visit takes place over four days, typically Monday through Thursday schedule. A considerable amount of work is done prior to the visit by college employees, the Commission staff, and visiting team members. Those four days on the college campus and/or at the district office, in the case of multi-college districts, are filled with activity with considerable time spent by team members in the team room at the campus or in the hotel, poring over documents, interviewing people, and writing in order to determine whether the college meets the Standards. The chair makes formal remarks at various stages of the visit and meets with the CEO and others throughout the visit. There is no attempt during the visit to resolve any compliance issues, nor is there any discussion between the president, the team chair, and the Commission.

RECOMMENDATIONS

1. Simplify the site visit. The present structure requires the team to "prove" that the college meets every standard and substandard. Consider using a structure similar to other accreditors: one visit (virtual or in-person) that focuses on issues of compliance (pre-visit team); and another visit that focuses on improvement.
2. Apprise the chair of all oral presentations that have to be made and provide talking points or a script so that remarks are consistent and the chair says only what is appropriate. Oral presentations include opening remarks at the beginning of the visit; remarks to commence the open forum; and the exit interview report.
3. Consider increasing the team visit by one day so that the team has time to deliberate and an opportunity to have discussions with the CEO and other college personnel regarding the findings.
4. Add a formal collegial exit meeting with the leadership team of the college or district to discuss preliminary findings so that the college is aware of deficiencies while the team is there and given an opportunity to clear up any issues.
5. Carefully review practices of other Commissions, and consider adopting practices that would improve effectiveness of ACCJC practices.

RATIONALE AND EVIDENCE

The site visit should be about improvement and quality. If pre-visit recommendations are implemented, then more time should be available to the team to review the overall quality of the institution. Transparency of team findings and recommendations should be improved. The team visit should be improved to reflect the spirit of peer review and collaboration.

Comments from team chairs and team members who recently participated in site visits strongly suggest changes in ACCCJC's current practices.

- "The site visit would have been more productive if we'd had more access to evidence ahead of time. There were reasonable justifications for this (poor internet connection, a lack of an online archive of materials) but this definitely meant that I was crunched for time. In a case where we are going to have less pre-visit access to materials, I think it'd be good to really consider the scope of evidence available as assignments to standards are made. I did a fairly typical spread of assignments to different standards and felt way more crunched than usual for time (even though different from the past we didn't have to read previous reports prepared by the college!)"

- "Not enough time. More time is needed for cross-checks and validation."

- "I believe that starting team visits on Sundays instead of Mondays will lead to more productive visits."

- "Need more time on campus during visits. Monday noon through Thursday noon is only 72 hours. Please add 24 more hours to campus visits!"

Practices from other commissions in this area offer much more effective ways of conducting site visits.

Southern Association of Schools and Colleges Commission on Colleges (SASCCOC)
"It is assumed that the Off-Site Committee will be able to determine the institution's compliance with the majority of the requirements and standards from the documentation available to them. Since the primary tasks of the On-Site Committee are to conduct an assessment of the institution's QEP and to write the reaffirmation report to be submitted to the Commission on Colleges, it is important for the On-Site Review Committee to address and resolve compliance issues as expeditiously as possible early in the on-site review. However, if there are a significant number of compliance issues that need to be resolved by the On-Site Review Committee, the length of the on-site visit may need to be extended, and/or the number of members of the On-Site Committee may need to be increased."

"There are two scheduled exit conferences at the conclusion of the on-site visit:

1. a discussion among the president, the chair, and the Commission staff dealing with a summary of the committee's report; and
2. a discussion of the committee's report among the Commission staff, the chair, the institution's leadership team, and members of the On-Site Committee. (This is the concluding exit conference conducted for the purpose of providing consultation to the institution regarding improvements that might be made in the QEP.)

There may be an optional session relaying the committee's report that includes the committee chair, the Commission staff, the institution's leadership team, other institution staff the president wishes to invite, and any On-Site Committee members who can be available. Attendance of committee members is optional. The president is expected to inform Commission staff in advance if such a session is planned."

Middle States Association of Colleges and Schools (MSACS) Proposal for refocused accreditation processes and cycle:
"A team of peer evaluators reviews the institution's Self-Study Report and the report of the off- site documentation review and confirms its conclusions in an on-site visit. At least one member of the team will have also participated in the off-site documentation review. The Evaluation Team's responsibilities are to:

1. Confirm that the institution does or does not continue to meet the Requirements of Affiliation and Standards for Accreditation.
2. Provide a written report to the institution that includes:
    a. An analysis of the institution's documentation and Self-Study Report;
    b. Recognition of significant accomplishments, significant progress, or exemplary/innovative practices;
    c. Collegial suggestions for institutional improvements that the institution is free to follow or not as it sees fit;
    d. If the needed institutional improvements rise to the level of one or more of the set of recommendations provided by the Commission, specification of which recommendations the Commission should make;
    e. If the institution is found to not meet one or more Standards or Requirements of Affiliation, supporting evidence and analysis for that conclusion and a statement of a requirement or requirements describing the actions the institution must take in order to meet the identified standard(s).
3. Provide a written confidential brief to the Commission that summarizes the key findings in the

team report; identifies the recommendations for institutional improvements that the team; proposes the Commission make to the institution; and proposes the accreditation action the Commission should take with regard to the institution.

The tighter focus of the Self-Study Report, along with the number of standards in the 2014 Standards for Accreditation, allows for smaller Evaluation Teams. Having the Evaluation Team choose from a set of recommendations for institutional improvements provided by the Commission frees the team from the current obligation to craft its own recommendations in light of the Standards and the institution's situation; this is intended to allow for greater consistency across teams and institutions.

The shift to the Commission as the source of recommendations for institutional improvement allows for greater consistency in the Commission's expectations with regard to the Standards and to institutional improvements, and enhances the Commission's interaction and communication with its member institutions."

New England Association of Schools and Colleges (NEASC)
The process seems to mirror ACCJC and the evaluation guide actively discourages visits to the classrooms. The report out may be more comprehensive for the NEASC:

"Experience suggests that classroom visits during the evaluation are not highly productive. A few class visits provide relatively little input to the process of making reliable judgments on the quality of the institution as a whole. Instead, a thorough analysis of outcomes data in the self-study and other evidence presented by the institution attesting to its attempts to evaluate its effectiveness in achieving its objectives provides more trustworthy evidence."

Exit Report
During the final session at the institution, the chair presents an oral preview of all the major points that will be made in the written team report, omitting only the confidential recommendation regarding the institution's accreditation status. In effect, the exit report is a summary of the team's written report. The chair and the president decide who should be present at the session. For example, the president may want the major administrative officers and/or steering committee of the self-study to be present. All team members attend. If the exit report is open to a significant number of members of the campus community, the chair will want to meet privately with the president in advance of the meeting to preview the contents of the report.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
SASCCOC Handbook for Review Committees	To be determined
MSCHE Self Study and Team Visit	
NEASC Evaluation Manual	

4. POST-VISIT

CURRENT STATUS

A considerable amount of the work involved in the process is completed by the end of the site visit. However, work continues for the chair and team members at the conclusion of the visit. The team chair has to use the Standard reports to develop the Evaluation Team Report into a comprehensive and coherent document. The Team Chair Manual gives very clear directions on the writing of the Report, especially in formulating and finalizing the recommendations. In finalizing the report, the team chair shares the report electronically with team members to ensure accuracy and with the assigned Commission staff liaison who provides assistance to the chair as needed. Once the report is completed and is accepted by the liaison, the chair sends the report to the college being evaluated to determine whether there are errors of fact in the report. After the exchange with the CEO of the evaluated college, the chair's work is done unless s/he is invited to the Commission meeting at which the reports are reviewed. There is limited interaction among the college, the team chair and ACCJC staff once the team report is submitted to the Commission.

There is no formal review of recommendations given to colleges for parity when evaluating a multi-college district. Colleges within a multi-college district receiving similar recommendations, e.g. one being for compliance and the other improvement, calls into question the objective nature of the process.

RECOMMENDATIONS

1. Provide an opportunity for dialog and discussion beyond the limit set forth by the "errors of fact" review of the document by the college under review.
2. Provide the opportunity for discussion together among the team chair, ACCJC staff, and the college CEO or ALO throughout the process rather than at only particular points.
3. Share the final Commission-approved report and the ACCJC action letter with the visiting team chair for distribution and discussion with the visiting team to close the loop on the visit.
4. Share the rationale for any changes to the team's recommendations with the chair.
5. Provide an opportunity for the team chair, the institution's leadership team, and ACCJC staff to review and discuss the final decision of the Commission.
6. Provide verbal or written feedback to the team chair on his/her performance and the performance of the team in the spirit of continuous improvement.
7. Give CEOs and college personnel sufficient time at the Commission meeting to provide a response to the team report. (Commissioners need to be mindful of their tone with members who address the Commission.)

RATIONALE AND EVIDENCE

The site visit is fast-paced and requires guided leadership from the team chair and commitment and dedication by the entire team. The culmination of the site visit is the Evaluation Team Report. However, once it is submitted, very little to no opportunity exists for the team chair to take part in any follow-up review or discussion with the president and/or the Commission. There is a strong desire by the visiting team chair to have an opportunity to remain engaged in the accreditation process to the extent that it is reasonable. As demonstrated by other regional accreditors, opportunities do exist whereby the team chair and the president are invited to meet with Commissioners for an interactive discussion to review the comprehensive evaluation. Similarly, institutional representatives have the opportunity to meet with the Commission during its deliberations prior to any Commission action.

New England Association of Schools and Colleges Commission on Institution of Higher Education (NEASC)
"Commission Review and Decision: Normally the Commission considers comprehensive evaluations the semester following the visit. The institution's president (CEO) and team chair are invited to meet with the Commission for an interactive session to review the comprehensive evaluation. Included in the review are

the team report, the confidential recommendation of the team chair, the institution's response, and the history of Commission action with respect to the institution. Two reviewers will also have the institution's self-study and materials distributed to the team with the self-study. In addition, in keeping with federal regulations, the Commission seeks and considers Public Comment regarding each evaluated institution." https://cihe.neasc.org/institutional-reports-resources/reporting-guidelines/comprehensive-evaluation.

Middle States Association of Colleges and Schools (MSACS)
"Immediately after the visit, the Chair compiles the work of team members and drafts a written Team Report, consistent with the oral exit report that was given to the institution. The draft report is sent to the institution to be reviewed for factual accuracy. After receiving any factual corrections from the institution, the Chair issues the final written version of the report. The institution then sends to the Commission a written response to that report. The Institutional Response allows the institution to provide additional clarification or analyses; alternatively, the institution may accept the report as written.
The Chair, on behalf of the team, also prepares a Confidential Brief which includes a proposed action concerning the institution's accreditation for the Commission's consideration. The Commission notifies the Chair and the institution of due dates for submission of the final Team Report, the Institutional Response, and Confidential Brief."

Also, this is noted as a proposed change in process:
"Commission review of the Self-Study and Evaluation Reports remains essentially the same as at present. It is a three-tiered peer review process and provides for institutional response.
After the team visit, the institution provides a formal written Institutional Response to the team's report that addresses the team's findings, the team's proposed recommendations for institutional improvements, if any, and institutional actions already taken in response to the team's report.
The Commission's Committee on Evaluations reviews the institutional Self-Study, the report from the off-site documentation review, the Evaluation Team Report, and the formal Institutional Response and endorses or modifies the Team's proposed recommendations, if any, and proposed accreditation action, and forwards them to the Commission. The Commission reviews the Evaluation materials and endorses or modifies the proposed recommendations and action."

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
SACSCOC Handbook for Review Committees	To be determined
WASC Senior Comprehensive Review For Reaffirmation - Evaluator Guide	
Comprehensive Evaluation NEASC CIHE Website	
MSCHE Self Study Guide Version 13A	

5. SUBSTANTIVE CHANGE REPORT

CURRENT STATUS

Colleges are spending significant time and resources on accreditation reporting requirements such as Substantive Change reports.

RECOMMENDATIONS

Streamline preparation of Substantive Change reports by limiting information requested and providing a template developed with input from the users and a review of approaches used by other Commissions.

RATIONALE AND EVIDENCE

Compliance with reporting requirements is consuming significant time for ALOs, administrators, faculty, and staff. Streamlining reporting requirements and reducing redundancies will allow colleges to remain focused on institutional improvements and innovation in education. A survey of ALOs in May 2016 confirmed that several ALOs felt Substantive Change reports were too comprehensive and required significant amounts of time to complete.

Middle States Association of Colleges and Schools (MSACS)

MSCHE appears to have two levels of Substantive Change requests. Substantive Change requests are reviewed by peer evaluators and acted on by the Executive Committee or by the Commission. If the proposed change is sufficiently complex that it requires more in-depth review or requires the Commission to engage a consultant with expertise in a particular area (e.g. accounting, legal, etc.), it is considered a Complex Substantive Change. Such changes may be reviewed by the Committee on Follow-Up prior to Executive Committee or Commission action. Any change of ownership, control, or merger is reviewed as a Complex Substantive Change. Other changes such as requests for multiple changes (number of locations or number of types of change) may be considered to be Complex Substantive Change.

MSCHE provides templates for different Substantive Changes. Following is an example of questions to be answered for a request.

In cases where an appropriate template is not yet available, institutions should provide the following information:

1. statement of the nature, purposes and need for the proposed change, including relevance to the institution's mission, objectives, and strategic planning process;
2. analysis of the financial impact of the proposed change (including three-year projections for enrollment, expenses, appropriate resources, and revenue);
3. analysis of the impact of the proposed change on institutional organization and governance, student learning outcomes, student services, faculty credentials and selection, facilities, and overall institutional effectiveness;
4. analysis of the impact of the proposed change on the institution's capacity to continue to meet the Commission's requirements of affiliation and accreditation standards; and
5. documentation of all necessary approvals required to initiate the proposed change (e.g. authorization from institutional governance structures, corporate parent or system office, state licensure body, and/or other applicable entities).

Commission approval is provisional and the institution may not implement the change until the Commission receives all necessary paperwork.

New England Association of Schools and Colleges (NEASC)

NEASC also has provisions for a limited Substantive Change process.

"The Commission recognizes that some changes, while affecting the mission and objectives, scope, or form of control of an institution, are of such limited extent that they may be approved by the President without the necessity of the full evaluation procedure outlined below in 'Accreditation Procedures for Substantive Changes.' Nonetheless, the Commission wishes to be informed of such limited changes; changes approved as limited changes will be examined as part of the next evaluation of the institution by the Commission.

Guidelines for submitting a change include the following:

If an institution decides to proceed with the change, it must provide a report, typically 25-30 pages long, to the Commission at least six months prior to the date of its implementation. In all cases, the institution should document the approval of the proposed change by any required state review before the Commission will consider the proposed change.

The report will include the following.

1. Cover sheet (available on the Commission's website), including the date of approval by the institution's governing board and authorization by the appropriate state agency.
2. Introduction: A summary of the proposed change, including a timeline, and a brief institutional overview.
3. A detailed description and analysis of the proposed change, including the purpose of the change and how it is consistent with the institution's mission. This section should also address each of the Standards for Accreditation and provide evidence of how, through the proposed change, the institution will continue to fulfill the Standards. When the proposed change involves a degree program (e.g. a joint degree with a non- regionally accredited entity), the report should include a description of the curriculum, sample course outlines and syllabi, and information about the qualifications of the faculty.
4. A multi-year revenue and expense budget, including the assumptions underlying the projections as well as an indication of the fiscal and administrative capacity of the institution to oversee and assure the quality of the proposed change.
5. Projection of Future Developments: A brief look at the future, indicating any general developments anticipated in terms of the institution and/or the substantive change."

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4. A multi-year revenue and expense budget, including the assumptions underlying the projections as well as an indication of the fiscal and administrative capacity of the institution to oversee and assure the quality of the proposed change
5. Projection of Future Developments: A brief look at the future, indicating any general developments anticipated in terms of the institution and/or the substantive change."

Higher Learning Commission
Each type of change has a brief template to complete.

<u>Substantive Change Review Process Structure</u>
"A Commission Change Panel shall consist of three or more Commission Peer Reviewers designated by the Commission who shall review applications for approval of substantive change submitted by institutions. The Change Panel may seek additional information from the institution if such information is being sought to explain or clarify the materials provided by the institution in its application for change.

The Change Panel may recommend the change be denied or that it be approved with or without additional monitoring as appropriate. Such recommendation will then be forwarded to an appropriate Commission decision making body. The institution shall be given an opportunity to review the recommendation and provide an institutional response prior to consideration of the recommendation by the decision-making body.

Alternatively, the Change Panel may recommend that the change be further evaluated by an on-site evaluation team, either by a Change Visit or by a previously scheduled focused or comprehensive evaluation. The Change Panel may seek additional information from the institution, if such information is being sought, to explain or clarify the materials provided by the institution in its application for change.

Commission Change Visit. A Change Visit shall consist of a team of two or more Commission peer reviewers designated by the Commission who shall review applications for approval of substantive change submitted by institutions.

The Change Visit team may recommend that the change be approved, approved subject to additional monitoring, or denied. Such a recommendation will then be forwarded to an appropriate Commission decision-making body. The institution shall be given an opportunity to review the recommendation and provide an institutional response prior to consideration by the decision-making body.

Commission Desk Review. A Commission Desk Review shall consist of a review of a proposed institutional change conducted by an individual Commission official. The Desk Review will result in a recommendation for approval of substantive change to an appropriate Commission decision-making body. **The Northwest Commission on Colleges and Universities (NWCCU)** has a similar proposal requirement, but specifies that an application will prompt Commission staff to contact the college to provide guidance."	
SOURCE DOCUMENTS	**ACCJC BYLAW AMENDMENT REQUIRED**
MSCHE Substantive Change Policy	To be determined
MSCHE Substantive Change Procedures	
NEASC Policy on Substantive Change	
HLC Policy on Substantive Change and related templates	
NWCCU Substantive Change Policy	

6. ANNUAL REPORT/WORKLOAD

CURRENT STATUS
Colleges are spending significant time and resources on Annual Reports. Annual reporting has expanded in recent years to include narratives about learning outcomes and other information not commonly collected in other regions.
RECOMMENDATION
Limit annual reporting to basic data and provide an electronic reporting system.
RATIONALE AND EVIDENCE
Annual reporting is conceived by other commissions as a check-in process to provide information such as number of degrees granted and to alert the commission to upcoming changes. ACCJC has continued to expand the information it collects annually beyond what seems necessary and consequently, the time commitment to complete annual reports has grown and often the amount of time given colleges to complete them is insufficient. In addition, there are few guidelines to clarify the questions and the follow up after reporting is unclear. **Higher Learning Commission** The Institutional Update is submitted using an electronic input system. All affiliated institutions are required to complete HLC's Institutional Update each year. This report, which is completed online, provides HLC with up-to-date information on the scope of activities of each affiliated institution and sufficient information to understand and respond to significant shifts in an institution's capacity and/or scope of educational activities. In reviewing the Institutional Update, HLC looks at relationships among a variety of indicators in a given year or over several years. If those relationships suggest that the institution may be experiencing problems or very rapid change, HLC invites the institution to submit an interpretation of the data. **Northwest Commission on Colleges and Universities** Annual Report is a fillable 10-part form requesting basic data such as a list of new or terminated programs. No narrative information is required nor is information about percentages related to learning outcomes assessment.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
NWCCU 2015 Annual Report form	To be determined
Higher Learning Commission Institutional Update form and guidelines	

E. Areas of Focus V

Commission Operations

1. **Financial Transparency**
2. **Commission Size**
3. **Composition Nominating Committee**

1. FINANCIAL TRANSPARENCY

CURRENT STATUS
The ACCJC membership struggles with understanding the organization's finances, particularly in light of increases in dues and fees. For the past two years, members have received a supplemental bill with virtually no detail or explanation. Commission membership should be reviewed in order to provide additional expertise and balance in order to better support the decision-making process.
RECOMMENDATION
In conjunction with ACCJC's Annual Conference (beginning 2017), Schedule a CEO Forum open to all members. Include a presentation on ACCJC's finances, present and planned, without disadvantaging it in its legal or confidential matters. The legal bills that are crippling the financial and operational capacity of the Commission should be communicated transparently to both Commissioners and the membership to aid them in evaluating whether the strategy to address ongoing litigation is prudent and sustainable. The goal of the Forum is to provide clear information for the CEOs to use in their campus planning, budgeting and communication needs. Additionally, providing this information will improve the financial transparency of the Commission.
RATIONALE AND EVIDENCE
Many college leaders have expressed a need for more information from ACCJC on its financial status. Specific issues include the rationale associated with determining dues and fees, advance notice on fee increases, assets, liabilities along with income and expenses of the Commission. Some information is currently made public via the IRS Form 990; the most recent available information is for 2014. The stated rationale that this information is confidential and sharing it with members would threaten the success of ongoing litigation is undercut by the Form 990 disclosure. A summary of what can be viewed online follows: NTEE Codes: Professional Societies & Associations Assets ..... $2,377,366 Income ..... $3,082,184 Expenses ..... $4,672,785 Liabilities ..... $1,213,035 Ruling Year ..... 2014 Fiscal Year Start ..... July 1

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
Guidestar.com for IRS Form 990 results	To be determined

2. COMMISSION SIZE AND COMPOSITION

CURRENT STATUS

ACCJC has 19 Commissioners representing 10 offices and constituencies. There are three current and pending vacancies. The table below shows the size and composition of the Commission as compared to others in size and number of categories.

Commission	Size	Categories of Commissioners
ACCJC	19	10
WASCCU	20-40	4
HLC	16-21	4
SACSOC	77	4
MSCHE	26 minimum	3
NEASC	27 maximum	2
NWCCU	8-26	5

Following are the categories of membership for the ACCJC Commission.

Number of Representatives	Entity
1	California Community College Chancellor's Office
1	Representative of the system Office of the University of Hawaii Community Colleges
Minimum of 5	Academic/Faculty
Minimum of 3	Public
Minimum of 3	Administrators
1	Independent Institutions
1	ACS/WASC
1	American-Affiliated Pacific Islands
1	Affiliate Members

ACCJC Commission membership should be reviewed in order to provide additional expertise and balance to better support the decision-making process.

RECOMMENDATIONS

Re-define the configuration of Commission representation by deleting the ACS/WASC and Affiliate Members categories and using those positions in a different way.

1. Shift the ACSCU/WASC Commissioner position to *ex officio* non-voting status and have that position serve as a liaison to the Senior Commission, providing reports and communication to the Commission. Further, the Commission should request any reports from ACSCU/WASC to be delivered as part of the public session of ACCJC meetings.
2. To keep the Commission at 19 voting members, one additional member and the three deleted constituency seats will be reallocated as follows: create a Chief Financial Officer (CFO) category, with a minimum of two allocated Commissioners, active or retired. Allocate any remaining seats among existing constituencies.

RATIONALE AND EVIDENCE

The size of the Commission is well within the range established by the other regional accreditors. It is sufficient to do the necessary review work but not so large as to create coordination issues. ACCJC's prescriptive categories for Commissioners representing specific constituencies ensure representation to

counter the imbalance of population and geography in the region. With more than 80 percent of ACCJC-accredited institutions residing within a single state system, a less prescriptive representation could threaten the representation of those institutions from other states and regions, and those with other controlling authorities. In contrast, NEASC's two categories are (a) those employed by member institutions and (b) representatives of the public interest. Similarly, no other commission has the category of "Affiliate Members" available to it, although NWCCU does allow for a maximum of two Commissioners who are employed by educational institutions outside the region.

However, no other regional accrediting commission includes representation of K-12 education. Deleting the categories of "ACS/WASC" and "Affiliate Members" and increasing the number of representatives from other groups, including the new "CFO" constituency, could provide for needed additional expertise and balance to support the Commission's decision making. As the ACSCU/WASC Representative cannot be someone on the Senior Commission due to workload issues, switching that Commissioner to *ex officio* non-voting member will allow the person potentially to be a Commissioner from ACSCU/WASC and will enhance direct communication and the relationship between ACCJC and WASC.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
• Bylaws of ACCJC • "Standing Rules: SACSCOC Board of Trustees Executive Council" SACSCOC.org • Bylaws of the Higher Learning Commission, HLCommission.org • Bylaws of the Middle States Commission on Higher Education, msche.org • "Policy on Selection, Ethics, and Responsibilities of Commissioners, New England Association of Schools and Colleges, Commission on Institutions of Higher Education," cihe.neasc.org • Bylaws of WASC Senior College and University Commission, wascsenior.org • Bylaws of the Northwest Commission on Colleges and Universities, Article III, nwccu.org	Article III, Section 1

3. NOMINATING COMMITTEE

CURRENT STATUS

The most recent election cycle for Commissioners has been the subject of much frustration and confusion among member CEOs. The process—as implemented—can create the impression of secrecy and gives a strong advantage to the slate of candidates proposed by the Nominating Committee. The slate excluding qualified candidates gives the impression that the only qualified candidates are those included in the slate. Given the current environment of controversy and skepticism, the Commission should take immediate steps to ensure that the election process is fair and transparent in both appearance and fact.

The portion of the bylaws governing the operation of the Nominating Committee includes the following guidelines.

1. The Nominating Committee consists of eight (8) persons who serve two (2) year terms. The Executive Committee appoints four (4) commissioners and four (4) individuals from member institutions.
2. The Nominating Committee will be chosen to represent the broad interest of the Commission's member institutions.
3. The Chair of the Nominating Committee is selected by the Executive Committee.
4. The Commission notifies members of the Nominating Committee of the number of types of commissioners to be selected and any special considerations pertaining to such vacancies.
5. The Commission writes and informs a number of associations, chief executive officers, major organizations, and accreditation liaison officers listing the number and nature of positions to be filled and soliciting nominees for the projected vacancies.
6. The Nominating Committee reviews the nominees' qualifications and prepares a slate of candidates, with one (1) candidate being recommended for the position.
7. In the selection process, the Nominating Committee considers the need to meet the membership requirements of the Commission, as outlined in Article III of the Bylaws.
8. At-large candidates can also be added by the chief executive officers. To be added as an at-large candidate, a candidate must have the written endorsement of ten (10) or more chief executive officers.
9. The election process consists of the chief executive officer of each member institution voting for, or against the state, or for any at-large candidates in lieu of those individuals on the Nominating Committee's slate.

RECOMMENDATIONS

The goal of the recommendations is to promote consistency and transparency in the nomination process and to increase the number of desirable applications for service on the Commission. Some proposed recommendations require a change in the bylaws; examples as to how the recommendations can be incorporated into the relevant sections of the ACCJC Bylaws are included with the applicable recommendation.

1. A clear charge and statement of procedures for the Nominating Committee are essential. How the four individuals from member institutions are selected for the Nominating Committee and how the Nominating Committee works should be clearly delineated. Desired criteria for the member institution representatives should be explicit: regions to be represented; size of institution; and/or single-college or multi-college district. This recommendation requires 2 changes to the bylaws.

    - The following sentence replaces the third sentence of ARTICLE IV: COMMISSIONER ELECTION PROCESS, Section 1. Nominating Committee: *"The Executive Committee shall*

appoint to the Nominating Committee four Commissioners and four individuals from member institutions to the Nominating Committee, who are broadly representative of the size and geographic diversity of the member institutions."

- The following paragraph replaces the first paragraph of ARTICLE IV: COMMISSIONER ELECTION PROCESS, Section 2. Solicitation of Commission Applicants: *"The Commission shall notify the members of the Nominating Committee of the number and types of Commissioners to be selected and of any special considerations pertaining to such vacancies. The Commission shall write to all of the chief executive officers of the Commission's member institutions, the President of the Accrediting Commission for Senior Colleges and Universities (ACSCU) and the Executive Director of the Accrediting Commission for Schools (ACS), the chief executive officers, accreditation liaison officers, and academic senate presidents of all member institutions, districts and systems, and major organizations, and individuals known to have expressed interest, listing the number and nature of any positions to be filled, as well as the length of term, number of meetings, and approximate annual time commitment. Solicitation of candidates also should be included in appropriate Commission publications and communications. Applications should be available online for individuals who would like to be considered as a candidate for the Commission. The application should be announced on the Commission website along with any required documents and appropriate deadlines for all applications. To be considered the nominations must be returned by the date and time established by the Commission. Members of the Nominating Committee are ineligible for nomination to the Commission while serving on the Nominating Committee. The Nominating Committee shall review the nominees' qualifications, and shall prepare a slate of candidates, with one or more candidates being recommended for each position. In reviewing applications and preparing the slate, the Nominating Committee shall consider the need to meet the membership requirements of the Commission as outlined in Article III of the Bylaws as well as the following:*

2. The selection and review process of Commissioners also must be clearly presented. The desired qualifications and the preparation of a candidate slate should be transparent. It is not clear as to the preferred qualifications and expertise needed to be selected as a Commissioner.

3. ACCJC and the Nominating Committee should take an active role in promoting and marketing the types of Commissioners to be selected. Individuals should be able to self-nominate through an online process.

4. Marketing materials should be developed that provide Commissioner expectations, length of term, number of meetings per year, and time commitment. Potential applicants in the field are not clear as to the time commitment required to become a Commissioner.

5. The number of individuals who count the electoral ballots should be specified and should include one Commissioner, at minimum. Implementing this recommendation requires a change in Section 5. Counting the Ballots of the bylaws as shown below.

"The counting of the ballots shall take place at the ACCJC offices and shall be conducted by the executive staff <u>and Commissioners. A minimum of three individuals shall be present, including a minimum of one executive staff member and a minimum of one Commissioner.</u> In the event there are at large nominees

included on the ballot, the persons receiving the highest number of votes shall be elected to the Commission. In the event of a tie, there shall be a runoff of those persons who tied. The runoff shall be by electronic means or mail and shall be conducted according to time frames established by the Commission. The results of the election shall be announced as soon as practicable thereafter. Every effort shall be made to complete the process by mid-May."
RATIONALE AND EVIDENCE
The Nominating Committee provides a critical function for the ACCJC. The Committee is responsible for screening and recommending new Commissioners. This function must be transparent and consistent in promoting desirable and well qualified applicants. There have been many questions from college leaders as to how applicants are screened and selected. Concerns have also been expressed as how individuals from member institutions are selected to serve on the Nominating Committee. The proposed recommendations are a first step to making the work and function of the Nominating Committee credible and essential. Any perception that the current leadership of the Commission is involved in the selection of Commissioners either through influencing the Nominating Committee or by questioning members about who they support in the election process is corrosive in building trust and demonstrating transparency.

SOURCE DOCUMENTS	ACCJC BYLAW AMENDMENT REQUIRED
	Article IV, Section 1, Section 2, and Section 5

Appendix A

Workgroup Goal, Responsibility and Composition

A.1 Workgroup I

A.2 Workgroup II

APPENDIX A.1

WORKGROUP I: IMPROVING ACCJC STRUCTURE, FUNCTION, AND RELATIONS

GOAL

Representatives from California community colleges and other ACCJC member institutions will work with ACCJC commissioners to immediately undertake significant improvements in the structure and functioning of the Commission to address long-standing concerns of its members, giving special attention to the concerns noted by the U.S. Department of Education requiring compliance by October 2016.

RESPONSIBILITIES

1. Workgroup will meet beginning in April 2016 to develop a plan, with timeline and measurable outcomes, which will be submitted to the ACCJC Commission for action at its June 2016 meeting to institute changes for improvement.
2. Lead and monitor ongoing implementation of changes.
3. Provide regular updates of the group's activities and progress to ACCJC members and the CEOCCC Board, as well as formal quarterly progress reports.

MEMBERSHIP

California Community College CEOs

Helen Benjamin	Chancellor, Contra Costa CCD, Convener
Michael Claire	President, San Mateo College (San Mateo CCD)
David Wain Coon	Superintendent/President, Marin CCD
Debbie DiThomas	Superintendent/President, Barstow CCD
Kathy Hart	Superintendent/President, San Joaquin Delta CCD
Victor Jaime	Superintendent/President, Imperial Valley College (Imperial CCD)
Kathryn Jeffrey	Superintendent/President, Santa Monica CCD
Jowel LaGuerre	Chancellor, Peralta CCD
Marvin Martinez	President, East Los Angeles College (Los Angeles CCD)
Kindred Murillo	Superintendent/President, Lake Tahoe CCD
Kevin Walthers	Superintendent/President, Allan Hancock CCD
John Weispfenning	President, Santiago Canyon College (Rancho Santiago CCD)

University of Hawaii Community Colleges

No Representative

Western Pacific Community Colleges

No Representative

Private Colleges with Membership in ACCJC

John Zimmerman	President, MTI College

Academic Senate for California Community Colleges

David Morse	President, Academic Senate for California Community Colleges
Julie Bruno	Vice President, Academic Senate for California Community Colleges

Accreditation Liaison Officers

Lori Bennett	Executive Vice President, Moorpark College (Ventura CCD)
Meredith Randall	Vice President, Shasta College (Shasta-Tehama-Trinity Joint CCD)

Ex-officio Member

Brian King	Chancellor, Los Rios CCD

APPENDIX A.2

WORKGROUP II: WESTERN REGION HIGHER EDUCATION ACCREDITING MODEL

LONG-RANGE GOAL

Facilitate communication between representatives of regional accreditors and institutional members from various sectors of higher education to pursue a model for regional accreditation that aligns all segments of higher education in the Western region.

MEMBERSHIP

California Community College CEOs

Cindy Miles	Chancellor, Grossmont-Cuyamaca CCD, Convener
Lori Adrian	President, Coastline CC (Coast CCD) (Until 6/30/16)
Sandra Caldwell	President, Reedley College (State Center CCD)
Constance Carroll	Chancellor, San Diego CCD
Ron Kraft	Superintendent/President, Napa CCD
Willard Lewallen	Superintendent/President, Hartnell CCD
Dena Maloney	Superintendent/President, El Camino CCD
Cheryl Marshall	Chancellor, North Orange CCCD (After 7/1/16)
Sandra Mayo	President, Moreno Valley College (Riverside CCD)
Bryan Murphy	President, De Anza College (Foothill-DeAnza CCD)
Bill Scroggins	Superintendent/President, Mt San Antonio CCD
Susan Sperling	President, Chabot College (Chabot-Las Positas CCD)
Joe Wyse	Superintendent/President, Shasta-Tehama-Trinity CCD

University of Hawaii community colleges

Lui Hokoana	Chancellor, Maui College, University of Hawaii

Western Pacific community colleges

No Representative

Private Colleges with membership in ACCJC

Jeff Atkins	President, Carrington College

WASC Senior College and University Commission

Mary Ellen Petrisko	President
William Bill Ladusaw	Chair

Accrediting Commission for Community and Junior Colleges

No Representative

Ex-officio Member

Brian King	Chancellor, Los Rios CCD

Appendix B

Correspondence on the Baccalaureate

B.1 Letter from Dr. Wellsfry to the Board of Governors
B.2 Letter from Dr. Simpson to Dr. Wellsfry
B.3 CEO Letters of Support to ACCJC
B.4 Letter from Dr. Wellsfry to Dr. Simpson

ACCREDITING COMMISSION for COMMUNITY and JUNIOR COLLEGES
Western Association of Schools and Colleges

Barbara A. Beno, President
Steven M. Kinsella, Chair

March 8, 2016

Mr. Geoffrey L. Baum
President
California Community Colleges Board of Governors
1102 Q Street
Sacramento, CA 95811

Dear President Baum:

The Board of Governors of the California Community Colleges, at its January 19-20, 2016 meeting, approved for First Reading the Baccalaureate Degree Pilot Program Handbook (Handbook). This Handbook was prepared without any consultation with the Accrediting Commission for Community and Junior Colleges (ACCJC). Therefore, the ACCJC is taking this opportunity prior to the Second Reading of this Handbook to alert the Board of Governors to a lack of alignment between the requirements contained within this Handbook and the ACCJC Accreditation Standards and generally accepted standards across all Regional Accreditors.

If California Community Colleges rely on the Handbook, they will find themselves out of alignment with ACCJC standards and may not meet the requirements for federal Title IV financial aid funds for students enrolled in the baccalaureate programs.

The Handbook specifies that its provisions have the force of law. However in those instances where the Handbook and the Accreditation Standards and policies conflict, the Accreditation Standards and policies would be the determining factor for federal financial aid.

There are several areas where the provisions in the Handbook are not in alignment with the standards of the ACCJC.

A. The Baccalaureate Degree Curriculum: The Handbook specifies the completion of a minimum of 24 units (36 quarter units) of upper division courses, including a minimum of 6 semester units (9 quarter units) of upper division general education. These unit levels are below those generally expected in higher education. The Handbook also specifies that a major must include a minimum of 18 semester units (27 quarter units) of upper division courses. These 18 units and the 6 general education units would be insufficient to meet the upper division requirement of the standards. Therefore students would be required to find additional units of upper division coursework outside of their majors. The California State University System (CSU) Title V requirements specify a minimum of 40 units (60 quarter units) of upper division coursework (§40500) and 9 units (12 quarter units) of general education (§40405.1).

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10 COMMERCIAL BOULEVARD
SUITE 204
NOVATO, CA 94949

EMAIL: accjc@accjc.org
www.accjc.org

The Standards of the ACCJC require the following:

II.A.5: The institution's ***degrees and programs follow practices common to American higher education, including appropriate length, breadth, depth, rigor, course sequencing, time to completion, and synthesis of learning*** *(emphasis added)*. The institution ensures that minimum degree requirements are 60 semester credits or equivalent at the associate level, and 120 credits or equivalent at the baccalaureate level. (ER 12)

II.A.9: The institution awards course credit, degrees and certificates based on student attainment of learning outcomes. Units of credit awarded are consistent with institutional policies that ***reflect generally accepted norms or equivalencies in higher education*** (emphasis added). If the institution offers courses based on clock hours, it follows Federal standards for clock-to-credit-hour conversions. (ER 10)

In accordance with these Standards, the ACCJC has adopted a Substantive Change process and a Policy on Accreditation of Baccalaureate Degrees that require 45 semester units (or equivalent) of upper division coursework including at least 9 semester units (or equivalent) of upper division general education. Therefore the unit levels established within the Handbook would be insufficient for a community college baccalaureate program. The upper division unit requirements of the baccalaureate degrees should be increased.

B. Upper Division Coursework: The Handbook indicates that "Courses that have been designated as upper division are only applicable to baccalaureate degrees and may not be used to satisfy associate degree requirements." As a practical matter, it is expected that all of the enrollees in baccalaureate programs will already possess an associate degree. However the wisdom of not allowing credits from a more rigorous baccalaureate degree program to apply to an associate degree seems misplaced and inconsistent.

   This section of the Handbook restates the unit requirements noted above. Therefore as stated above, the requirement of only 30 of the 60 units above the Associate Degree to be upper division units degrades the rigor, breadth, and depth of the community college baccalaureate degrees. This requirement should be upgraded.

   The Upper Division major Requirements section of the Handbook indicates that a college "may determine that a lower division course meets the requirements for an identified upper division course requirement." As noted above in Standard II.A.9, this provision may be in conflict with the norms and equivalencies of higher education and would not be acceptable. At many institutions, lower division coursework is often required as part of a major. However that does not appear to be the meaning or intent of this requirement.

C. Minimum Qualifications for Faculty: The Handbook specifies the minimum qualifications for faculty teaching upper division courses at California Community Colleges. The ACCJC Policy on Accreditation of Baccalaureate Degrees and Accreditation Standard III.A.2 (noted below) requires that faculty teaching in the baccalaureate degree must have a master's degree or above in the appropriate discipline. There is no provision for baccalaureate faculty with less than a master's degree in the appropriate discipline.

III.A.2: Faculty qualifications include knowledge of the subject matter and requisite skills for the service to be performed. Factors of qualification include appropriate degrees, professional experience, discipline expertise, level of assignment, teaching skills, scholarly activities, and potential to contribute to the mission of the institution. Faculty job descriptions include development and review of curriculum as well as assessment of learning. (ER 14)

The Handbook requirements for faculty indicate that, in some circumstances, a combination of professional experience, and/or licensure combined with any Master's degree and/or bachelor's degree is acceptable. These faculty would not meet the Accreditation Standards for faculty in a baccalaureate program. The requirements of the ACCJC are consistent with those of other Regional accreditors and the guidelines of the U.S. Department of Education.

Given the concerns outlined above, it is recommended that the Board of Governors refrain from approving this Handbook until revisions are made. The requirements for the Handbook should be consistent with those of the generally accepted requirements in higher education and the ACCJC Accreditation Standards and policies.

Sincerely,

Norval L. Wellsfry, Ed.D
Associate Vice-President

Cc: Dr. Brice Harris, Chancellor
Dr. Pamela D. Walker, Vice Chancellor

APPENDIX B.2
Letter from Dr. Simpson to Dr. Wellsfry

April 13, 2016

Dr. Norv Wellsfry, Ed.D
Associate Vice President
Accrediting Commission for Community and
Junior Colleges
10 Commercial Boulevard, Suite 204
Novato, CA 94949

Dear Dr. Wellsfry:

This letter is in response to the misalignment between the provisions of the Baccalaureate Degree Pilot Program Handbook and the Accrediting Commission for Community and Junior Colleges (ACCJC) draft standards in the "Policy on Accreditation of Baccalaureate Degrees."

Over the last year, our colleges worked in concert with the ACCJC staff on matters related to the community college baccalaureate degree. They engaged in participatory consultation in developing policies for the Baccalaureate Degree Pilot (BDP) Program with the BDP colleges, Academic Senate for California Community Colleges (ASCCC), and the Chancellor's Office. Several meetings convened throughout the state gave everyone the opportunity to have meaningful dialogue. Additionally, extensive research was conducted regarding the development of policies on minimum qualifications, required number of upper division units, and required number of upper division general education units. Below are the areas of misalignment between ACCJC's draft policy and the BDP Program Handbook along with the research to support the policies that we established:

- Minimum Qualifications: The BDP Program Handbook, at a minimum, recommends instructors teaching upper division courses to possess a baccalaureate degree plus six years of experience in disciplines where a master's degree is not usually attained. ACCJC requires "a master's degree or above in the appropriate discipline" (Standard III.A.2 (2014)). Several pilot degrees, such as Automotive Technology and Dental Hygiene, are in areas for which a master's degree does not exist. In our research we found that Eastern Florida College – with regards to their minimum qualifications for Health Sciences, Aerospace, Occupational/Technical programs – requires the following: "Master's degree with a major with specialization in primary teaching area, or a Bachelor's degree with specialization in primary teaching area with three years of relevant employment experience, or AA/AS degree with specialization in primary teaching area with six years of relevant employment experience."

  In a conversation on April 7, you indicated that the master's requirement was in response to the U.S. Department of Education directive that ACCJC impose rigorous standards on the colleges. However, other commissions and the ACCJC itself have never imposed a degree requirement for the community college lower division courses. Moreover, in the field these rigorous standards have always related to curriculum development rather than instructor degree attainment.

  In our research, other accrediting commissions, such as WASC Senior and University Commission and Middle States Commission on Higher Education, require qualifications such as relevant and professional experience, training, and credentials. Specifically, in its handbook regarding minimum qualifications, WASC states, "The institution employs personnel sufficient in number

and professional qualification to maintain its operations and support its academic programs, consistent with its institutional and education objectives."

- Required number of upper division units: The ACCJC draft policy requires 45 upper division units while the BDP Program Handbook requires a minimum of 24. Research from most accrediting commissions reveals that they require only 120 semester units, with no detailed breakdown for the amount of upper division units required. No research could be found to support the requirement of 45 units. In fact, the University of California at Berkeley's Chemistry BA program only requires 26 units of upper division; under the draft ACCJC policy, their program would not be approved. All currently approved California community college baccalaureates satisfy the requirement under Standard II.A.5 to have 120 total units for the baccalaureate. There are other examples of programs with regional accreditors that would not comply with the unit cap. Programs, especially in the science and technical areas, are often sequential and heavily dependent on significant lower division preparation to fully appreciate the rigor of a single upper division required course.

- Required number of upper division general education units: The BDP Program Handbook, at a minimum, requires six upper division general education units as opposed to nine in the draft policy. No evidence was found to support the higher number of units; additionally, our research shows that other accrediting commissions do not go into such detail in their handbooks.

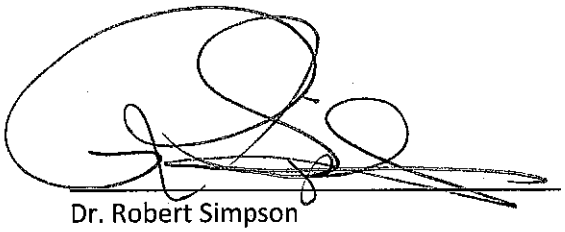
The colleges approved to participate in the California Community Colleges Baccalaureate Degree Pilot Program have worked with the Chancellor's Office and their local constituencies, including their curriculum committees, and in some cases licensure boards, to create rigorous, high-quality degrees that are in high demand in their communities and across the state. Over the past year, they worked in good faith with ACCJC and conformed to all approved standards and policies. For ACCJC to circulate a draft policy in January 2016 inconsistent with some of the BDP Program Handbook provisions is contrary to its recent statement that "ACCJC relies on communications with the institutional CEOs to discuss matters of policy" and "collaboration and openness to change will benefit educational quality in the region" (April 5, 2016, news release, "California Community College CEOs and Accreditor to Partner in Accreditation Reform"). In this case, CEOs of the pilot colleges were not consulted prior to the release of the draft policy. In addition, all but one of the pilot colleges have received substantive change approvals, and based on those approvals, several colleges have moved forward with preparing to offer their programs in fall 2016. Now, the colleges find themselves in the difficult position of being ready to offer baccalaureate degrees without the necessary time to reflect on the proposed changes.

The undersigned colleges, therefore, request that ACCJC work with a designated group representing the pilot colleges to (1) resolve discrepancies between the BDP Program Handbook and ACCJC's draft policy, using current nationwide practices as a guide and (2) develop an appropriate timeline for any changes to currently approved degrees that will not jeopardize colleges' accreditation status nor the ability of students starting upper division courses in fall 2016. This work needs to proceed collaboratively and expeditiously to fulfill the intent of the legislation, to respect the work of the pilot colleges, and to accommodate the many students eagerly waiting for the baccalaureate programs. Until this matter is resolved colleges may be hesitant to schedule site visits.

The BDP Program Handbook represents more than a year of significant communication with all pilot colleges, as well as meetings with ACCJC representatives, ASCCC faculty leaders, Chief Instructional Officers throughout the state, and the Chancellor's Office. It is clear that these issues must still be

resolved; to that end, we request a meeting of all relevant stakeholders within the next three weeks, at a location of your choice. Please contact Dr. Joyce Carrigan at (714) 808-4937 or jcarrigan@nocccd.edu to schedule the meeting.

Thank you.



Dr. Robert Simpson
President
Cypress College

4/13/2016
Date

ANTELOPE VALLEY COLLEGE

Office of the President

April 14, 2016

Dr. Norval L. Wellsfry, Ed.D
Associate Vice President
Accrediting Commission for Community and
Junior Colleges
10 Commercial Boulevard, Suite 204
Novato, CA 94949

Dear Dr. Wellsfry:

I Ed Knudson, President of Antelope Valley Community College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely

Ed Knudson
Superintendent/President

Feather River College

Office of the President

570 Golden Eagle Avenue ▪ Quincy, California ▪ 530-283-0202 ▪ ext. 232
ktrutna@frc.edu ▪ www.frc.edu ▪ fax: 530-283-3757

April 14, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Kevin Trutna, President of Feather River College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Kevin Trutna, Ed.D.
Superintendent/President

FOOTHILL COLLEGE
OFFICE OF THE PRESIDENT

April 13, 2016

Norv Wellsfry, Ed.D.
Associate Vice President
ACCJC

I, Kimberlee Messina, Interim President of Foothill College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Kimberlee S. Messina

Kimberlee Messina
Interim President
Foothill College

MODESTO JUNIOR COLLEGE

Jill Stearns, Ph.D.
President

435 College Avenue • Modesto, California 95350-5808 mjc.edu

April 14, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Jill Stearns, Ph.D., President of Modesto Junior College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Jill Stearns, Ph.D.

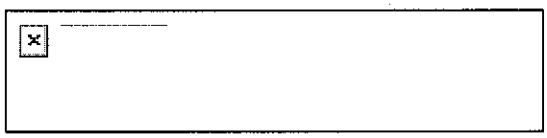
Date: April 13, 2016 at 2:34:58 PM PDT
To: Teresa Dreyfuss <TDreyfuss@riohondo.edu>
Subject: Letter to ACCJC regarding the proposed policy on the Accreditation of Baccalaureate Degrees

April 13, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Teresa Dreyfuss, Superintendent/President of Rio Hondo College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,



Teresa Dreyfuss

Superintendent/President, Rio Hondo College

TDreyfuss@riohondo.edu

(562) 908-3403

CELEBRATED PAST. BOUNDLESS FUTURE.

1530 West 17th St. • Santa Ana, CA 92706 • (714)564-6000 • www.sac.edu

April 15, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Erlinda J. Martinez, Ed.D., President of Santa Ana College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.
Sincerely,

Signature
Erlinda J. Martinez, Ed.D.
President

Joyce Carrigan, Ed.D.

From: KILIAN_LETICIA <kilian_leticia@smc.edu> on behalf of JEFFERY_KATHRYN <Jeffery_Kathryn@smc.edu>
Sent: Thursday, April 14, 2016 3:38 PM
To: Joyce Carrigan, Ed.D.
Cc: LORENZ_GEORGIA; MERLIC_JENNIFER
Subject: Letter to ACCJC regarding the proposed policy on the Accreditation of Baccalaureate Degrees

Importance: High

April 13, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Kathryn E. Jeffery, Superintendent/President of Santa Monica College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Kathryn E. Jeffery
Superintendent/President
Santa Monica College

Shasta College

Shasta-Tehama-Trinity Joint Community College District
11555 Old Oregon Trail • P.O. Box 496006 • Redding, CA 96049-6006
Phone: (530) 242-7500 • Fax: (530) 225-4990
www.shastacollege.edu

April 13, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Joe Wyse, Superintendent/President of Shasta College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Joe Wyse
Superintendent/President
Shasta College

An Accredited California Community College

April 13, 2016

Norv Wellsfry, Ed.D
Associate Vice President
ACCJC

I, Aracely Aguiar, Vice President of Academic Affairs and Accreditation Liaison Officer of West Los Angeles College, join Dr. Robert Simpson in supporting the letter by the 15 Baccalaureate Degree Pilot Colleges to ACCJC dated April 13, 2016 regarding the proposed policy on the Accreditation of Baccalaureate Degrees.

Sincerely,

Aracely Aguiar
West Los Angeles College
Acting, Vice President Academic Affairs
Accreditation Liaison Officer
310 287- 4325

ACCREDITING COMMISSION for COMMUNITY and JUNIOR COLLEGES
Western Association of Schools and Colleges
Barbara A. Beno, President
Steven M. Kinsella, Chair

May 13, 2016

Dr. Robert Simpson, President
Cypress College
9200 Valley View Street
Cypress, CA 90630

Dear President Simpson:

I am writing in response to your letter of April 13, 2016, which provides input on the ACCJC's *Policy on the Accreditation of Baccalaureate Degrees*. The policy is scheduled for second reading and adoption at the Commission's June 2016 meeting, and we appreciate your submitting comments on it. When ACCJC received this letter in April, it was sent to the Commissioners on the Policy Committee for their consideration. The Commissioners have considered your letter. The final policy language will be presented to the Commission for adoption at its June 8-10 meeting. A copy is attached.

When considering new policy language, the ACCJC employs a standardized process that affords all member colleges an equal opportunity to respond, as follows:

- New or proposed changes to existing policy language are presented for first reading at the open session of the Commission meeting. The Commission adopts it for first reading through a formal vote.
- The ACCJC notifies the member institutions of the proposed language within a short time after it is adopted for first reading, and provides a period of eight weeks for public comment on the language. People may contact the Commission staff to discuss the proposed policy, and may send in written comments for consideration by the Policy Committee of the Commission.
- ACCJC staff forwards all written comment to the Policy Committee, which is responsible for considering comments and for crafting final policy language for consideration by the Commission as a whole.
- Proposed policy language is finalized by the Policy Committee and is scheduled for second reading and adoption at the next meeting of the Commission.
- At its meeting, Commission accepts public comment on all matters on the open session agenda, including proposed policy language, at the beginning of the open session, before voting on the proposed policy language.

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The ACCJC developed the *Policy on Accreditation of Baccalaureate Degrees* (the Policy) following its December 2015 recognition review by U.S. Department of Education (USDE) staff and the National Advisory Committee on Institutional Quality and Integrity, or NACIQI. It is designed to satisfy the USDE as well as meet the needs of its member institutions for standards that assure that the quality of baccalaureate degrees will be accepted by the higher education community outside the community colleges, will be accepted by the public, and are of quality that will benefit students who receive the degrees.

In adopting policy language and standards, ACCJC recognizes its must be able to apply its standards to all of its member institutions – public and private – in California, Hawaii and the Western Pacific. ACCJC's language on the baccalaureate degree must be able to address the teacher education baccalaureate program offered by one of our Pacific institutions and planned by another, the range of technical education pilot programs offered by the California Community Colleges and the programs proposed by some of our private colleges. Our policy language must also satisfy the U.S. Department of Education, which has given ACCJC directives as to the quality, rigor, comprehensiveness and comparability of its standards to commonly accepted standards in higher education in the United States.

In developing the standards for its *Policy on the Accreditation of Baccalaureate Degrees*, ACCJC surveyed other regional accrediting commissions as to their policy and practice and examined institutional practices as to upper division credits necessary for a baccalaureate degree, upper division units of general education required, and faculty qualifications for teaching upper division courses.

The USDE directives to ACCJC include requirements that ACCJC ensure that in matters of curriculum and faculty qualifications, its standards are comprehensive, sufficiently rigorous and comparable to commonly accepted standards and processes for ensuring quality in baccalaureate degree programs. The directives also require ACCJC to ensure that its curricular standards are comprehensive and sufficiently rigorous for the institutions ACCJC accredits to maintain baccalaureate degree requirements that at least conform to commonly accepted practice in the country.

ACCJC understands that some California Community Colleges have requested that the proposed ACCJC policy lower its standards for upper division general education credits, total upper division credits, and/or faculty qualifications for teaching in the upper division courses. We have also examined some of the institutional cases your letter cites as exemplars of lower standards elsewhere in the country and find there may be some errors in the information you have been given.[1] Our review of commonly accepted practice supports the policy language that ACCJC will be considering for second reading.

---

[1] Your letter referenced the faculty qualifications at Eastern Florida College. When we examined the college's web site, we found that the minimum qualifications for faculty teaching in the baccalaureate or university-parallel programs is: Master's degree with a major in the primary teaching area OR Master's degree with 18 graduate semester hours in the primary teaching area. This is higher than the AA/AS degree noted in your letter. Your letter indicated that the U.C. Berkeley BA in Chemistry required 26 units. The U.C. Berkeley BA in Chemistry program requires 30 units in the major with selected electives, but the College of Arts and Letters also requires an additional 6 units for a total of 36 units. The CSU System in California, to which we understand the California Community

In reviewing the planning proposals submitted to the ACCJC's Substantive Change process, we find that the majority of the California community colleges already conform to the requirements of the *Policy on Accreditation of Baccalaureate Degrees* proposed by ACCJC. Several more are very close to meeting the requirements and will be able to do so with minor changes to their initial plans. Informal communications indicate many have already made the necessary adjustments.

Over the last few months I, as well as our President, have had opportunity for several conversations about the standards proposed in ACCJC's draft *Policy* with representatives of the California Community Colleges that are offering baccalaureate degrees, including individual conversations with presidents of some of the colleges. We have discussed the reasons that ACCJC has established its standards and generally found acceptance of our standards.

ACCJC initiated the conversation with the California Community Colleges system when it pointed out the gap between standards in its draft *Policy on Accreditation of Baccalaureate Degrees* and the criteria contained in the *Board of Governors Pilot Program Handbook* by sending a letter to the Board of Governors dated March 8, 2016. That letter was sent as well to Vice Chancellor Pam Walker so that it would be shared with all concerned colleges offering the baccalaureate degree. In a response letter March 11, 2016, Dr. Walker stated that the Handbook was a flexible "draft" and could be changed as needed once adopted by the BOG.

In a phone conference call on April 7, 2016, several persons representing the baccalaureate colleges and Vice Chancellor Walker spoke with me about the issues. ACCJC then received your letter of concern dated April 13, 2016. Another conversation occurred during an April 27, 2016 webinar ACCJC scheduled to discuss its proposed *Policy on Accreditation of Baccalaureate Degrees*.

On May 6, Dr. Carrigan sent another letter to me and requested a face-to-face meeting. I spoke with her on May 10, and proposed we conduct a phone conference call of all representatives of the California colleges planning the baccalaureate degree program who wish to continue discussing it. While she rejected the idea of a conference call, that offer is still open. ACCJC is open to hearing what constructive comments the member institutions might wish to make, and to hear their concerns about the proposed policy. We welcome the opportunity to answer questions or provide needed clarifications. At this time of year, my time is very limited, and a conference call would be the best I can offer as a form of "meeting."

However, as the Policy Committee has now adopted the final language in the Policy on Accreditation of Baccalaureate Degrees language for second reading, the concerned individuals are advised they may wish to attend the Commission's open session and voice their opinions directly to the Commissioners. In making its decision, the Commission will have to weigh its needs to have clear and rigorous policy language that meets the requirements for of the USDE and provides a strong framework for all of its member two-year colleges offering baccalaureate

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Colleges pegged their baccalaureate degree programs, requires 9 units of upper division general education units, not six as proposed in the Handbook.

degrees now and in the future. Our students' needs for high quality education must be considered paramount.

Please feel free to call our offices if you have any questions. Again, thank you for participating in the review and consideration of new policy language for the ACCJC.

Sincerely,

Norval D. Wellsfry, Ed.D.
Associate Vice President

Cc: Presidents, California Community College Pilot Program Colleges

Attachments:
1. Eastern Florida State College faculty qualifications
2. California State University regulations
3. For second reading, *Policy on Accreditation of Baccalaureate Degrees*

ATTACHMENT 1

http://www.easternflorida.edu/administration-departments/human-resources/employment-needs-opportunities/faculty-and-staff-qualifications.cfm
Eastern Florida State College Faculty Qualifications

Most adjunct faculty positions require a Master's degree from a regionally-accredited or CHEA-recognized institution with a major in the discipline to be taught, per information below. Some Health Sciences, Aerospace, Occupational/Technical, Continuing Education, Professional Training & Certification, and prep courses may require lesser degrees.

Baccalaureate or University-Parallel Programs: Master's degree with a major in the primary teaching area OR Master's degree with 18 graduate semester hours in the primary teaching area.

Technical Programs: Master's degree with specialization in primary teaching area, or a Bachelor's degree with specialization in primary teaching area with 3 years of relevant employment experience, or AA/AS degree with specialization in primary teaching area with 6 years of relevant employment experience.

Vocational Programs: Master's degree with specialization in primary teaching area, or a Bachelor's degree with specialization in primary teaching area with 3 years of relevant employment experience, or AA/AS degree with specialization in primary teaching area with 6 years of relevant employment experience, or High School diploma with relevant licenses or certifications and 6 years of relevant employment experience.

Continuing Education Programs: Appropriate degree, experience, or demonstrated expertise in teaching area.

To be considered for a teaching position, you are required to submit, as part of your completed Eastern Florida State College employment application, copies of the appropriate transcripts to reflect that you have met this requirement. During the application process, photocopies of the transcripts may be submitted. All foreign degrees must have a course-by-course official evaluation and translation sent to the Human Resources Office directly from an evaluation company affiliated with the National Association of Credential Evaluation Services, Inc.

ATTACHMENT 2

BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS

Barclays Official California Code of Regulations
Title 5. Education
Division 5. Board of Trustees of the California State Universities
Chapter 1. California State University
Subchapter 2. Educational Program
Article 6. Undergraduate Degrees

5 CCR § 40500

§ 40500. Bachelor of Arts Degree: Required Curriculum.
To be eligible for the Bachelor of Arts degree, the candidate shall have completed the following requirements:
(a) General Education-Breadth Requirements. The courses in General Education-Breadth Requirements shall be distributed in the manner prescribed in Sections 40405-40405.4.
(b) Major ..... 24 semester units (36 quarter units).
There shall be one major with a minimum of 24 semester units (36 quarter units). At least 12 semester units (18 quarter units) in the major shall be upper division courses or their equivalent. The maximum number of units shall be determined by the campus.
(c) Additional Units. Units to complete the total required for the degree may be used as electives or to meet other requirements.
(d) Total. For candidates electing, pursuant to Section 40401, to meet graduation requirements established prior to the 2000-01 academic year, the total semester units required for the Bachelor of Arts Degree, of which at least 40 (60 quarter units) shall be in the upper division credit, shall be 124 semester units (186 quarter units). For candidates for the Bachelor of Arts degree who are meeting graduation requirements established between the 2000-01 and through the 2013-14 academic years, a minimum of 120 semester units shall be required, including at least 40 semester units in upper-division courses or their equivalent. For candidates for the Bachelor of Arts degree who are meeting graduation requirements established during or after the 2013-14 academic year, no fewer and no more than 120 semester units shall be required, including at least 40 semester units in upper-division courses or their equivalent, unless the Chancellor grants an exception.
Note: Authority cited: Section 89030, Education Code. Reference: Section 89030, Education Code.

§ 40405.1. California State University General Education - Breadth Requirements.

5 CA ADC § 40405.1BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS

Barclays Official California Code of Regulations Currentness
Title 5. Education
Division 5. Board of Trustees of the California State Universities
Chapter 1. California State University
Subchapter 2. Educational Program
Article 5. General Requirements for Graduation

5 CCR § 40405.1
§ 40405.1. California State University General Education - Breadth Requirements.
(a) Each recipient of the bachelor's degree completing the California State University General Education-Breadth Requirements pursuant to this subdivision (a) shall have completed a program which includes a minimum of 48 semester units or 72 quarter units of which 9 semester units or 12 quarter units shall be upper division level and shall be taken no sooner than the term in which the candidate achieves upper division status. At least 9 of the 48 semester units or 12 of the 72 quarter units shall be earned at the campus granting the degree. The 48 semester units or 72 quarter units shall be distributed as follows:
(1) A minimum of 9 semester units or 12 quarter units in communication in the English language, to include both oral communication and written communication, and in critical thinking, to include consideration of common fallacies in reasoning.
(2) A minimum of 12 semester units or 18 quarter units to include inquiry into the physical universe and its life forms, with some immediate participation in laboratory activity, and into mathematical concepts and quantitative reasoning and their applications.
(3) A minimum of 12 semester units or 18 quarter units among the arts, literature, philosophy and foreign languages.
(4) A minimum of 12 semester units or 18 quarter units dealing with human social, political, and economic institutions and behavior and their historical background.
(5) A minimum of 3 semester units or 4 quarter units in study designed to equip human beings for lifelong understanding and development of themselves as integrated physiological, social, and psychological entities.
The specification of numbers of units implies the right of discretion on each campus to adjust reasonably the proportions among the categories in order that the conjunction of campus courses, credit unit configurations and these requirements will not unduly exceed any of the prescribed semester or quarter unit minima. However, the total number of units in General Education-Breadth accepted for the bachelor's degree under the provisions of this subdivision (a) shall not be less than 48 semester units or 72 quarter units unless the Chancellor grants an exception.
(b) The president or an officially authorized representative of a college which is accredited in a manner stated in Section 40601 (d) (1) may certify the extent to which

the requirements of subdivision (a) of this section have been met up to a maximum of 39 semester units (or 58 quarter units). Such certification shall be in terms of explicit objectives and procedures issued by the Chancellor.
(c) In the case of a baccalaureate degree being pursued by a post-baccalaureate student, the requirements of this section shall be satisfied if:
(1) The student has previously earned a baccalaureate or higher degree from an institution accredited by a regional accrediting association; or
(2) The student has completed equivalent academic preparation, as determined by the appropriate campus authority.
Note: Authority cited: Section 89030, Education Code. Reference: Sections 66055.8 and 89030, Education Code.

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
Western Association of Schools and Colleges

Policy on Accreditation of Baccalaureate Degrees

General Requirements

Member institutions which seek to gain accreditation for a baccalaureate degree program will first need to gain substantive change approval.[1] That approval may include the requirement for a follow-up report and team visit to address specific issues identified by the Substantive Change Committee and to verify that the institution remains in compliance with Eligibility Requirements, Accreditation Standards, and Commission policies as the program implementation moves forward.

Upon completion of the substantive change requirements and following approval, the baccalaureate degree program will be expected to demonstrate and maintain compliance with Eligibility Requirements, Accreditation Standards, and Commission policies as part of an accredited institution. As part of an institution's comprehensive evaluation, both the institutional self-evaluation report (ISER) and the evaluation team report will be expected to specifically address the compliance of the baccalaureate degree program with all applicable Accreditation Standards, Eligibility Requirements, and Commission policies.

Limits on Institutional Baccalaureate Degree Offerings

The ACCJC extends its accreditation to institutions which have as a primary mission the granting of associate degrees. In accordance with the Bylaws of the ACCJC:

> The operational definition of having as a primary mission the granting of associate degrees includes the following: 75% of the programs offered by the institution must be at the Associate degree or pre-Associate degree college level, and 60% of students at the institution must be in Associate degree or pre-Associate Degree level programs, except that a primarily 2-year higher education institution that has or proposes only a single baccalaureate degree program may do so without regard for these percentages.

In addition, the U.S. Department of Education (USDE) has granted to ACCJC the scope of approving one baccalaureate degree at each member institution through the substantive change process.[2] The U.S. Department of Education's approval of this scope is the means by which institutions and their programs may qualify for federal student aid and federal aid to postsecondary institutions.

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[1] See the Policy on Substantive Change and the Manual on Substantive Change for articulation of the policies and procedures related to substantive change.
[2] As has been previously communicated to the field, the ACCJC is seeking an expansion of this USDE scope to include baccalaureate degrees as would fall within ACCJC's general scope of accreditation under its Bylaws.

Institutions exploring the addition of Baccalaureate Degrees will need to consider the extent of ACCJC's scope.

An institution preparing an Institutional Self Evaluation Report for purposes of reaffirmation of accreditation must, for the Eligibility Requirements, Accreditation Standards, and Commission policies listed below, specifically address and provide evidence of its practices as to the baccalaureate degree and how those practices meet the Eligibility Requirements, Accreditation Standards, and Commission policies. In addressing the standards Eligibility Requirements, Accreditation Standards, and Commission policies, the institution must also address and provide evidence of its practices for the baccalaureate degree program-specific evaluation criteria listed below.

Eligibility Requirements

The Eligibility Requirement listed below applies to the baccalaureate degree programs.

1. Authority: *The institution is authorized or licensed to operate as a post-secondary educational institution and to award degrees by an appropriate governmental organization or agency as required by each of the jurisdictions or regions in which it operates.*

Private institutions, if required by the appropriate statutory regulatory body, must submit evidence of authorization, licensure, or approval by that body. If incorporated, the institution shall submit a copy of its articles of incorporation.

Specified Baccalaureate Degree Program Evaluation Criteria:

- Authority requires that an institution be authorized or licensed as a post-secondary institution to award degrees. An institution wishing to gain approval for a baccalaureate degree will have to provide evidence of the institution's authorization to offer the degree, as required by each of the jurisdictions or regions in which it operates.

A number of additional Eligibility Requirements (ERs) referenced in the Standards have specific application to the baccalaureate degree and are covered by the institution's compliance with those standards Eligibility Requirements, Accreditation Standards, and Commission policies.

Accreditation Standards

The Accreditation Standards listed below apply to the institution as a whole and to each baccalaureate degree program. As appropriate, the list includes criteria indicating how the Standards specifically apply to baccalaureate degree programs. In addressing the Standards, the institution must also address and provide evidence of its practices for the baccalaureate degree program-specific evaluation criteria identified below.

Standard I.A.1, *The mission describes the institution's broad educational purposes, its intended student population, the types of degrees and other credentials it offers, and its commitment to student learning and student achievement. (ER 6)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Institutions may need to make changes to the institutional mission to reflect the baccalaureate degree which must align with the Institutional mission.
- Student demand for the baccalaureate degree should demonstrate its correlation with the institutional mission.

Standard I.A.2: *The institution uses data to determine how effectively it is accomplishing its mission, and whether the mission directs institutional priorities in meeting the educational needs of students.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The assessment of data, in addition to measuring institution effectiveness, must also demonstrate the effectiveness of the baccalaureate degree program.
- The assessment of the baccalaureate degree must be differentiated from the overall assessment of institutional outcomes.

Standard I.A.3: *The institution's programs and services are aligned with its mission. The mission guides institutional decision-making, planning, and resource allocation and informs institutional goals for student learning and achievement.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The baccalaureate degree program is clearly aligned with the institutional mission.
- The institution has included the baccalaureate degree in its decision making and planning processes, and in setting its goals for student learning and achievement.

Standard I.B.2 *The institution defines and assesses student learning outcomes for all instructional programs and student and learning support services.* (ER 11)

Specified Baccalaureate Degree Program Evaluation Criteria:

- Student learning outcomes for upper division baccalaureate degree courses reflect higher levels of depth and rigor generally expected in higher education.
- Assessment must be accurate and distinguish the baccalaureate degree outcomes from those of other programs.

Standard I.B.3: *The institution establishes institution-set standards for student achievement, appropriate to its mission, assesses how well it is achieving them in pursuit of continuous improvement, and publishes this information. (ER 11)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The Institution has institution-set standards for the baccalaureate degree program and assesses performance related to those standards. It uses this assessment to improve the quality of the baccalaureate degree program.

- Student Achievement standards are separately identified and assessed for baccalaureate degree programs to distinguish them from associate degree programs.

Standard I.B.7: *The institution regularly evaluates its policies and practices across all areas of the institution, including instructional programs, student and learning support services, resource management, and governance processes to assure their effectiveness in supporting academic quality and accomplishment of mission.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The institutional evaluation of policies and practices recognizes the unique aspects and requirements of the baccalaureate degree program in relation to learning and student support services and resource allocation and resource management.

Standard I.C.1: *The institution assures the clarity, accuracy, and integrity of information provided to students and prospective students, personnel, and all persons or organizations related to its mission statement, learning outcomes, educational programs, and student support services. The institution gives accurate information to students and the public about its accreditation status with all of its accreditors. (ER 20)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Information related to baccalaureate degree programs is clear and accurate in all aspects of this Standard, especially in regard to learning outcomes, program requirements, and student support services.

Standard I.C.2: *The institution provides a print or online catalog for students and prospective students with precise, accurate, and current information on all facts, requirements, policies, and procedures listed in the "Catalog Requirements" (see endnote). (ER 20)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The catalog and other information for students shall include accurate and current information concerning all requirements for the baccalaureate degree including admissions criteria, enrollment processes, academic requirements, and all other relevant and pertinent information.

Standard I.C.3: *The institution uses documented assessment of student learning and evaluation of student achievement to communicate matters of academic quality to appropriate constituencies, including current and prospective students and the public. (ER 19)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The assessment results of student learning and student achievement in the baccalaureate degree programs are used in the communication of academic quality.

Standard I.C.4: *The institution describes its certificates and degrees in terms of their purpose, content, course requirements, and expected learning outcomes.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The purpose, content, course requirements and learning outcomes of the baccalaureate degree programs are clearly described.

Standard II.A.1: *All instructional programs, regardless of location or means of delivery, including distance education and correspondence education, are offered in fields of study consistent with the institution's mission, are appropriate to higher education, and culminate in student attainment of identified student learning outcomes, and achievement of degrees, certificates, employment, or transfer to other higher education programs. (ER 9 and ER 11)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The baccalaureate degree field of study aligns with the institutional mission.
- The baccalaureate degree program is appropriate to higher education
- The baccalaureate degree program will culminate in identified student learning outcomes appropriate to higher education.
- The baccalaureate degree program leads to employment or transfer to other higher education programs.

Standard II.A.3: *The institution identifies and regularly assesses learning outcomes for courses, programs, certificates and degrees using established institutional procedures. The institution has officially approved and current course outlines that include student learning outcomes. In every class section students receive a course syllabus that includes learning outcomes from the institution's officially approved course outline.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Learning outcomes for baccalaureate courses, programs, and degrees are identified and assessed consistent with institutional processes.

Standard II.A.5: *The institution's degrees and programs follow practices common to American higher education, including appropriate length, breadth, depth, rigor, course sequencing, time to completion, and synthesis of learning. The institution ensures that minimum degree requirements are 60 semester credits or equivalent at the associate level, and 120 credits or equivalent at the baccalaureate level. (ER 12)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- A Minimum of 40 semester credits or equivalent of upper division coursework including the major and general education is required.
- The academic credit awarded for upper division courses within baccalaureate degree programs is clearly distinguished from that of lower division courses.
- The instructional level and curriculum of the upper division courses in the baccalaureate degree are comparable to those commonly accepted among like degrees in higher education and reflect the higher levels of knowledge and intellectual inquiry expected at the baccalaureate degree level.
- Student expectations, including learning outcomes, assignments and examinations ~~of~~ in the upper division courses demonstrate the rigor commonly accepted among like degrees in higher education.

- The program length and delivery mode of instruction are appropriate for the expected level of rigor.

Standard II.A.6: *The institution schedules courses in a manner that allows students to complete certificate and degree programs within a period of time consistent with established expectations in higher education.*[3] *(ER 9)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Baccalaureate degree courses are scheduled to ensure that students will complete those programs in a reasonable period of time.

Standard II.A.9: *The institution awards course credit, degrees and certificates based on student attainment of learning outcomes. Units of credit awarded are consistent with institutional policies that reflect generally accepted norms or equivalencies in higher education. If the institution offers courses based on clock hours, it follows Federal standards for clock-to-credit-hour conversions. (ER 10)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Baccalaureate Degrees and the course credit in those programs are based on student learning outcomes. These outcomes are consistent with generally accepted norms and equivalencies in higher education, especially in relation to upper division courses.

Standard II.A.10: *The institution makes available to its students clearly stated transfer-of-credit policies in order to facilitate the mobility of students without penalty. In accepting transfer credits to fulfill degree requirements, the institution certifies that the expected learning outcomes for transferred courses are comparable to the learning outcomes of its own courses. Where patterns of student enrollment between institutions are identified, the institution develops articulation agreements as appropriate to its mission. (ER 10)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Policies for student admission into the baccalaureate degree program ensure that all program requirements are fulfilled, including completion of the minimum required semester units, prerequisites, experience, and general education.

Standard II.A.11: *The institution includes in all of its programs, student learning outcomes, appropriate to the program level, in communication competency, information competency, quantitative competency, analytic inquiry skills, ethical reasoning, the ability to engage diverse perspectives, and other program-specific learning outcomes.*

Specified Baccalaureate Degree Program Evaluation Criteria:

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[3] Glossary- Established expectations in higher education (also, appropriate for, accepted in, common to, accepted norms in, etc.): Shared and time honored principles, values and practices within the American community of higher education.

- Student learning outcomes in baccalaureate degree programs are consistent with generally accepted norms in higher education and reflect the higher levels expected at the baccalaureate degree level.

Standard II.A.12: *The institution requires of all of its degree programs a component of general education based on a carefully considered philosophy for both associate and baccalaureate degrees that is clearly stated in its catalog. The institution, relying on faculty expertise, determines the appropriateness of each course for inclusion in the general education curriculum, based upon student learning outcomes and competencies appropriate to the degree level. The learning outcomes include a student's preparation for and acceptance of responsible participation in civil society, skills for lifelong learning and application of learning, and a broad comprehension of the development of knowledge, practice, and interpretive approaches in the arts and humanities, the sciences, mathematics, and social sciences. (ER 12)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- At least 36 semester units or equivalent of lower and upper division general education is required, including at least 9 semester units or equivalent of upper division general education coursework.
- The general education requirements are integrated and distributed to both lower division and upper division courses.
- The general education requirements are distributed across the major subject areas for general education; the distribution appropriately captures the baccalaureate degree level student learning outcomes and competencies.

Standard II.A.13: *All degree programs include focused study in at least one area of inquiry or in an established interdisciplinary core. The identification of specialized courses in an area of inquiry or interdisciplinary core is based upon student learning outcomes and competencies, and include mastery, at the appropriate degree level, of key theories and practices within the field of study*.

Specified Baccalaureate Degree Program Evaluation Criteria:

- The baccalaureate degree program includes a focused study on one area of inquiry or discipline at the baccalaureate level and includes key theories and practices appropriate to the baccalaureate degree level.

Standard II.A.14: *Graduates completing career-technical certificates and degrees demonstrate technical and professional competencies that meet employment standards and other applicable standards and preparation for external licensure and certification*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The CTE baccalaureate degree ensures students will be able to meet employment standards and licensure or certification as required in the field of study.

Standard II.B.1: *The institution supports student learning and achievement by providing library and other learning support services to students and to personnel responsible for student*

learning and support. These services are sufficient in quantity, currency, depth, and variety to support educational programs, regardless of location or means of delivery, including distance education and correspondence education. Learning support services include, but are not limited to, library collections, tutoring, learning centers, computer laboratories, learning technology, and ongoing instruction for users of library and other learning support services.

Specified Baccalaureate Degree Program Evaluation Criteria:

- Learning support services to support the baccalaureate degree program are sufficient to support the quality, currency, rigor and depth of the baccalaureate degree and reflect the unique needs of the program.
- Resource collections are sufficient in regard to the rigor, currency, and depth expected of baccalaureate degree programs.

Standard II.C.6: *The institution has adopted and adheres to admission policies consistent with its mission that specify the qualifications of students appropriate for its programs. The institution defines and advises students on clear pathways[4] to complete degrees, certificate and transfer goals. (ER 16)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The prerequisites and other qualifications for the baccalaureate degree are appropriately communicated and applied to students.
- The advising of students related to the baccalaureate degree appropriately identifies course sequencing and pathways.

Standard III.A.1: *The institution assures the integrity and quality of its programs and services by employing administrators, faculty and staff who are qualified by appropriate education, training, and experience to provide and support these programs and services. Criteria, qualifications, and procedures for selection of personnel are clearly and publicly stated and address the needs of the institution in serving its student population. Job descriptions are directly related to institutional mission and goals and accurately reflect position duties, responsibilities, and authority.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The job descriptions for faculty members teaching in the baccalaureate degree accurately reflect the duties and responsibilities associated with the position.

Standard III.A.2: *Faculty qualifications include knowledge of the subject matter and requisite skills for the service to be performed. Factors of qualification include appropriate degrees, professional experience, discipline expertise, level of assignment, teaching skills, scholarly activities, and potential to contribute to the mission of the institution. Faculty job descriptions include development and review of curriculum as well as assessment of learning. (ER 14)*

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[4] Glossary- Pathways: The specific selection and progression of courses and learning experiences students pursue and complete and they progress in their education toward a certificate, degree, transfer, or other identified educational goal.

Specified Baccalaureate Degree Program Evaluation Criteria:

- The qualifications for faculty teaching in the baccalaureate degree include the requirement for a master's degree (or academic credentials at least one level higher than the baccalaureate degree) or above, in an appropriate discipline.
- Faculty teaching in the program's upper division courses reflect those qualifications.

Standard III.A.7: *The institution maintains a sufficient number of qualified faculty, which includes full-time faculty and may include part-time and adjunct faculty, to assure the fulfillment of faculty responsibilities essential to the quality of educational programs and services to achieve institutional mission and purposes*.

Specified Baccalaureate Degree Program Evaluation Criteria:

- There is at least one full-time faculty member assigned to the baccalaureate degree program.

Standard III.B.3: *To assure the feasibility and effectiveness of physical resources in supporting institutional programs and services, the institution plans and evaluates its facilities and equipment on a regular basis, taking utilization and other relevant data into account.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The facilities and other physical resources utilized by the baccalaureate degree program are evaluated for effectiveness for the program on a regular basis.

Standard III.C.1: *Technology services, professional support, facilities, hardware, and software are appropriate and adequate to support the institution's management and operational functions, academic programs, teaching and learning, and support services.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- Technology services and support, facilities, hardware and software utilized by the baccalaureate degree program are appropriate and adequate for the program.

Standard III.D.1: *Financial resources are sufficient to support and sustain student learning programs and services and improve institutional effectiveness. The distribution of resources supports the development, maintenance, allocation and reallocation, and enhancement of programs and services. The institution plans and manages its financial affairs with integrity and in a manner that ensures financial stability. (ER 18)*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The financial resources allocated to the baccalaureate degree program are sufficient to support and sustain program student learning and effectiveness.
- Financial resources allocated to the baccalaureate degree program ensure the financial stability of the program

Standard IV.A.4: *Faculty and academic administrators, through policy and procedures, and through well-defined structures, have responsibility for recommendations about curriculum and student learning programs and services.*

Specified Baccalaureate Degree Program Evaluation Criteria:

- The faculty and academic administrators assigned to the baccalaureate degree program have responsibility for making recommendations to appropriate governance and decision-making bodies about the curriculum, student learning programs, and services for the program.

Catalog Requirements

The institution assures that the Catalog provides the following information about the baccalaureate degree program:

1. General Information
   - Course Program and Degree Offerings
   - Student Learning Outcomes for the Program and Degree
2. Requirements for
   - Degrees, Certificates, Graduation and Transfer

Commission Policies

In preparing its ISER, an institution with one or more ACCJC-accredited baccalaureate degrees must, for the evaluation criteria cited in the Checklist for Evaluating Institutional Compliance with Federal Regulations and Related Commission Policies[5] in the categories identified below, specifically address and provide evidence of its practices as to the baccalaureate degree and how those practices meet the criteria.

- Standards and Performance with Respect to Student Achievement
- Credits, Program Length, and Tuition
- Transfer Policies
- Distance Education and Correspondence Education
- Institutional Disclosure and Advertising and Recruitment Materials

[5] See the Checklist for Evaluating Institutional Compliance with Federal Regulations and Related Commission Policies for articulation of the evaluation criteria.

Appendix C

Survey Summaries

C.1 Chief Executive Officer Summary and Survey
C.2 Visiting Team Chair Summary and Survey
C.3 Team Members Summary and Survey

APPENDIX C.1
CHIEF EXECUTIVE OFFICER SUMMARY AND SURVEY

Responses of CEO

Helpful approaches. The *accreditation process* did stimulate colleges to change and improve: program review, integrated planning, budget allocation linkages were strengthened***.*** For multi-college districts, the overview meeting for all the colleges was helpful.

Challenges and improvements. CEOs viewed the *accreditation process* as time-consuming. One noted little or no balancing benefits for students. T*he standards* were difficult to interpret; it was challenging to interpret if colleges met standards and if standards were applied reliably, sparking concerns about bias and transparency. Goals for improvement should not be limited to the colleges but include the District. Districts might benefit from developing their own Quality Focused Assays (QFE). *District recommendations* can have unfair impact on the colleges.

Survey Template

ACCJC Workgroup I - Survey of CEOs Visited

1. Was the accreditation process what you had hoped it would be as evidenced by this visit?

2. What could have better prepared you/your college for the visit?

3. What aspects of the visit were best?

4. What suggestions for improvement would you recommend?

5. Was the process helpful to your faculty and staff?

APPENDIX C.2
VISITING TEAM CHAIRS SUMMARY AND SURVEY

Responses of Team Chairs

Helpful approaches. Training provided a focus on key issues and forged cohesive expectations. When Chairs are well-trained and have experience the visits can go very smoothly. Good chairs provide an informed perspective and manage their teams to address difficult distinctions and structure the work.

Challenges and improvements. ACCJC training is insufficient. More examples and case studies in the training would provide clarity. Some confusion on how the college QFE should be used. Additional resource materials would help make decisions and write the report: examples, online exercises and guidance, case studies and specifications for the QFE. Materials might be delivered prior to meetings.

Survey Template

ACCJC Workgroup I - Survey of Chairs

1. Did the ACCJC training prepare you for the visit?

2. What aspects of the training were most helpful?

3. What could have been added to, or changed, about the training to make the experience for you and your team better?

4. Did the team have a sufficient orientation to their roles as team members?

5. Were the expectations of the team's activities reasonable in your opinion?

6. Please add any suggestions that you think might be helpful in improving any aspect of the accreditation process.

APPENDIX C.3
TEAM MEMBERS SUMMARY AND SURVEY

Responses of Team Members

Helpful approaches. Time spent interacting with the team helped clarify roles and responsibilities. Also helpful was information about changes in standards. The writing exercises and discourse with other team members about tips, what to look for and how to best prepare.

Challenges and improvements. Members would benefit from *more guidance about the expected style and structure of the report*. Newer members would benefit from more actual training, in-depth discussion of scenarios, more Q&A on how to best prepare for the visit as opposed to presentation overviews. Special issues require more help: relationships between district and college teams, the value and the evaluation of the QFE, and visits that involve different cultures (Pacific Islands).
The question about the adequacy of timelines received variable responses; time pressure was added if colleges' submissions were not well-prepared, and if Chairs' timelines were compressed.
Improvements will better prepare team members. *Rethink training delivery*--include multi-media and customize for team members' levels of experience.

Survey Template

ACCJC Workgroup I - Survey of Team Members

1. Did the ACCJC training prepare you for the visit?

2. What aspects of the training were most helpful?

3. What could have been added to, or changed, about the training to make the experience for you and your team better?

4. With regard to the time allotted for the preparation for your visit and during the visit, to what degree was it adequate to meet team member expectations?

5. Please add any suggestions that you think might be helpful in improving any aspect of the accreditation process.