

# 2015 TASK FORCE ON ACCREDITATION

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## I. Preface

The California Community College System is strongly committed to peer accreditation. Evaluation through peer expertise helps to ensure informed and fair review of programs and services and benefits all institutions that take part by promoting and ensuring both quality and compliance. A credible and effective accreditation process allows the California Community Colleges to demonstrate assurance of quality and integrity and assists all institutions in improving the delivery of their services for the system's 2.1 million students.

Because of this commitment to peer accreditation, CEOs, faculty members, administrators, staff, trustees, and others have been active members of accreditation evaluation teams and have served as members of the Western Association of Schools and Colleges (WASC) Accreditation Commission for Community and Junior Colleges (ACCJC). Although the WASC region also includes Hawaii and the Western Pacific, the California institutions constitute the overwhelming majority of colleges within this region. After a long history of supportive, professional relationships and productive, professional evaluation processes, serious problems have emerged. For at least the past eight years, the accreditation process has been a subject of con-

cern throughout the California Community Colleges. Consistent calls for reform of the accrediting process and change on the part of the accrediting commission have been raised by the Chancellor's Office, administrative organizations, faculty groups, classified staff, and voices outside the college system.

The California Community Colleges Chancellor's Office convened the 2015 Task Force on Accreditation to address these serious concerns. The charge of the task force was to evaluate the current state of accreditation of community colleges in California and to recommend to the Chancellor and the Board of Governors of the California Community Colleges possible courses of action that will best serve students within the 113-college system. In approaching this charge, the task force determined that, rather than focus primarily on past difficulties, its report should be aspirational and should identify the qualities that would constitute an ideal accrediting agent. The members of the task force represent various constituent groups within the community college system, including administration, faculty, trustees, accreditation liaison officers, and the Chancellor's Office. This broadly representative group unanimously endorses the content and recommendations of this report.

## II. Introduction: History and Background

### Accreditation in the United States

Voluntary accreditation has been an important aspect of higher education systems throughout the United States for more than one hundred years. Effective accreditation serves the public interest by ensuring quality education for students, by assuring policymakers and taxpayers that resources are invested in high-quality institutions, and by ensuring the integrity of the entire system of higher education through meaningful self-regulation. Institutions must be accredited to participate in federal student aid programs; in turn, accreditors must be recognized by the U.S. Secretary of Education on the basis of the standards and review processes that office applies to institutions.

Regional accrediting organizations were first established to distinguish collegiate study from secondary schooling and had begun to recognize institutions as accredited based on defined standards by the 1930s. With the Veterans Readjustment Assistance Act of 1952, accreditation agencies were deputized to certify the suitability of individual colleges and universities to provide quality education for students whose studies were funded through taxpayer dollars, an assignment further formalized through the Higher Education Act of 1965.

Accreditation of higher education institutions occurs regionally, but accrediting agencies are reviewed nationally. Each regional accreditor is dependent on recognition by the U.S. Department of Education. Recognition review by the U.S. Department of Education normally takes place every five years. U.S. Department of Education staff makes recommendations to the National Advisory Committee on Institutional Quality and Integrity (NACIQI), which in turn recommends action to the U.S. Secretary of Education.

The United States is divided into six regions for purposes of accreditation: Higher Learning Commission North Central Association (NCA-HLC), Middle States Commission on Higher Education (MSCHE), New England Association of Schools and Colleges (NEASC),

Northwest Commission on Colleges and Universities (NWCCU), Commission on Colleges Southern Association of Colleges and Schools (SACS), and Western Association of Schools and Colleges (WASC). Of the six regions, only WASC is subdivided into separate commissions for community and junior colleges (Accrediting Commission for Community and Junior Colleges) and for institutions offering bachelor's and higher degrees (WASC Senior College and University Commission).

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As years have passed, the recognition criteria for regional accreditors by the federal government have become increasingly specific and compliance-oriented, leading to a more aggressive accountability function and an increased focus on detailed outputs. In 1984, the Southern Accreditation Commission adopted standards focused on institutional effectiveness, and other regions eventually followed suit. In 1992 the Higher Education Amendments increased the accountability function of accreditation and required accreditors to give greater focus to evidence of institutional quality and to review compliance with a growing list of increasingly detailed federal regulations. For example, whereas in the past colleges could maintain accreditation by affirming that their libraries contained an appropriate number of volumes, the modern approach requires a demonstration that the library's materials and services support positive student outcomes.

## **The California Community Colleges' Significance and Commitment to Institutional Quality**

Community colleges are the primary point of access to higher education in California and across the nation. One in every four community college students in the United States attends a California community college, and 29 percent of University of California and 51 percent of California State University graduates started at a California community college. In addition to preparation for transfer, the college system provides workforce training and certificate and degree programs as well as basic skills instruction in English and math.

To help meet the demand for the additional college-educated workers that California will need in the coming decade, the California Community Colleges Board of Governors announced that it will seek to increase the number of students who earn certificates or degrees or who transfer to four-year institutions by 227,247 over the next ten incoming freshmen classes. This ambitious goal demonstrates an effort to establish clear markers for measuring the effectiveness of the system's Student Success Initiative.

In further demonstration of the system's commitment to institutional quality and to the accreditation process, in Fall 2014 the Chancellor's Office took advantage of the first infusion of post-recession funding to create an Institutional Effectiveness Division and initiated the Institutional Effectiveness Partnership Initiative. The primary mission of this new division and of the initiative that it oversees is to assist colleges in improving their overall effectiveness and in meeting accreditation standards. As these efforts show, the California community colleges continue to acknowledge their own roles and responsibilities in regard to self-reflective quality assurance and to participation in and improvement of the accreditation process.

### **Accreditation Under the Accrediting Commission for Community and Junior Colleges**

While an increasing federal focus on compliance and accountability has placed new pressures on all regional accreditors, the reaction of the Accrediting Commission for Community and Junior Colleges

(ACCJC) to these pressures has led to more frequent sanctions than those issued by any other similar body. Between February 2005 and July 2015, all but 37 of the California community colleges were placed on some level of sanction, two-thirds of the total colleges in the system. Although many of these institutions were removed from sanction relatively quickly, the numbers are inordinately high compared to the frequency of sanctions under other accreditors. According to the June 2014 State Audit Report of California Community College Accreditation, between 2009 and 2013 the ACCJC issued 143 sanctions out of the 269 accreditation actions it took. This sanction rate is approximately 53 percent, compared to approximately 12 percent sanction rates within the other six regional accreditors. The quantity and frequency of sanctions issued by the ACCJC, in conjunction with other controversial actions and practices of this accreditor, have led to frequent calls for reform of the accrediting process from member institutions of the ACCJC.

A variety of reports, resolutions, and recommendations have been issued by individual organizations and through joint efforts. Since 2007, the Academic Senate for California Community Colleges has adopted numerous resolutions expressing concerns about accreditation processes. A task force formed by the Chancellor's Office of the California Community Colleges in 2009, with representatives from various system constituencies, met for more than a year, surveyed college presidents and accreditation liaison officers, and developed a report with seven recommendations that were sent to ACCJC in Spring 2010. In 2011, the Research and Planning Group for the California Community Colleges issued a report with bold observations regarding the ways in which California's accrediting process compared to other regional processes and significant recommendations for improving California's process. The Chief Executive Officers of the California Community Colleges conducted multiple forums for CEOs to meet and discuss concerns with accrediting commissioners and staff, surveyed members, and sent formal recommendations to the commission in June 2014 and then revalidated those recommendations in May 2015. Finally, in 2014 the California State Auditor produced an extensive

critique of the accreditation process that contained a variety of recommendations for reform. [See Appendix A: Crosswalk of Accreditation Recommendations 2009-2014.]

In addition, a second representative Chancellor's Office task force met in 2013 for more than nine months, reviewed research about other national regional accrediting commissions, best practices in accreditation, and feedback from the field, and worked to develop an additional report with further recommendations. The report was expected to contain both a critique of the current accrediting process and suggestions for improvement. A variety of circumstances at the time prevented the completion of this report, and therefore it was never finalized or published.

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Many of these efforts have acknowledged the responsibilities of the community college system and of individual institutions for aspects of the accreditation process and suggested various changes and improvements in these areas. Members of the 2013 Chancellor's Office Task Force, for example, reported that they strove for a collection of recommendations directed specifically to colleges and toward cooperative efforts between colleges and the accrediting commission. In this effort, as in many others, California community colleges have consistently acknowledged their own roles and responsibilities in regard to improving the accreditation process.

Yet despite the many calls for reform from the community college system as a whole and from individual constituent groups, the ACCJC has shown little

evidence of its willingness or ability to address and resolve concerns that have been raised. In spite of the many overtures on the part of the member colleges and their representatives to work with the accrediting commission in resolving issues and improving processes, the ACCJC has made no significant effort to engage in meaningful or lasting reform. As a result, the concerns raised in the 2010 Task Force Report persist, the accrediting process for California community colleges has lost credibility with the system, and calls for change have intensified.

Across the six regional accrediting commissions, the ACCJC is the only regional accreditor devoted solely to two-year colleges. In light of the increasingly blurred lines between two- and four-year colleges, this structure has come into question. With the passage of Senate Bill 850 (Block, 2014), which authorized the California Community Colleges to engage in a pilot program for offering baccalaureate degrees, the system is now entering a new era. The creation of baccalaureate degree programs will present not only new opportunities but also new challenges. These new degrees offered by the community colleges must meet standards consistent with comparable degrees offered by other institutions of higher education. Though the pilot baccalaureate degree program is only in its initial stages, already pressure is building for expansion. The community college system requires an accrediting agency that understands and can accommodate these new challenges and that can provide credible, consistent accreditation that encompasses all programs offered by its colleges.

For these reasons, the time has come for the California Community Colleges to address the wide range of outstanding and consistent issues that have been raised regarding accreditation and begin building a structure that is sustainable for the future. To this end, the 2015 Task Force on Accreditation offers the following description of the kind of accreditor that is needed to assist the California Community Colleges as the system moves into a new era. The community college system can accept no less than an accreditor that will work in a collegial and transparent manner to ensure the integrity and quality of its institutions and to protect the interests of the State of California and the students that the system serves.

## Part III: Ideal Attributes of an Accrediting Organization

Since 2007 in the various reports, resolutions, and other documents generated by constituent groups within the California Community Colleges, a number of common and consistent issues regarding accreditation have arisen. The crosswalk included as Appendix A of this report groups the recommendations made in these documents into a set of frequently stated themes that highlight the areas that the community college system has identified as the most serious causes for concern: transparency, collegiality, and consistency. If one considers the fundamental bases of these ongoing concerns, the themes embody and delineate the standards that the California Community Colleges need our accrediting agent to meet. These standards are enumerated in the following section of this report.

### **A. The accreditor emphasizes improvement rather than compliance.**

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

The accreditation process guides and promotes academic and institutional quality, excellent teaching, and student success. On a broad level, the purpose of accreditation is to ensure for the public and for students the integrity of a system of higher education; at the level of an individual institution, the purpose is to improve the institution and to ensure quality. In no case is accreditation used to punish or weaken institutions. In its communications and in dealings with member colleges, the accreditor encourages and supports progress and positive development at the institution.

### **B. The accreditor demonstrates collegiality and consistency in all of its actions with member institutions and constituent groups.**

*All institutions receive consistent and equitable treatment.*

In order to establish and maintain credibility, the accreditation process avoids any appearance of

inconsistency or inequity, whether intentional or unintentional. Accreditation standards consist of language that may be open to interpretation, but that language is interpreted and applied in the same ways in all instances. Likewise, the expectations for the evidence required and employed to support either positive or negative statements regarding an institution are consistent; one institution cannot be held to a different or higher standard of evidence than another. Information regarding visiting team findings or commission decisions is also shared in the same degree and manner for all institutions.

*The accreditor avoids any actual or appearance of conflict of interest at all levels of the accreditation process.*

The accrediting agent takes caution to avoid any appearance of conflict of interest in all areas, from the constitution of visiting teams to the members of the commission making final decisions. Whenever any hint of conflict of interest arises, the accreditor takes immediate and transparent action to remove that potential conflict.

### **C. Accreditation reports that indicate deficiencies include clear expectations for correction and allow reasonable opportunities for improvement.**

*The accreditor clearly identifies deficiencies and their level of significance.*

The extent and types of deficiencies in a report regarding any institution are clearly identified. Such a report indicates which deficiencies need immediate remediation and which are less severe. All institutions are treated equitably regarding time for remediation and opportunities for appeal.

*Sanctions are never an immediate or first response to deficiencies.*

Institutions are given informal notice of potential deficiencies and opportunity to correct them before any sanction is issued. Sanctions are in no case an immediate or first response to deficiencies identified

by the accreditor. In addition, extensions for and exceptions to full compliance with standards are issued for institutions that can demonstrate good cause. Institutions are allowed adequate opportunities to correct deficiencies in a non-threatening environment in order for the accrediting process to remain focused on improvement and success.

#### **D. The accrediting process and accreditor actions and decisions are transparent**

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

Decisions made by the accreditor are responsive to the needs and interests of member institutions and system constituent groups. Decision-making regarding accreditation processes is transparent and allows for meaningful input and participation. The accreditor does not dismiss or selectively solicit public input in establishing or revising policies regarding issues such as the development and approval of new standards. The accreditor's response to negative input has no appearance of being dismissive or retaliatory.

*Processes for appointment of commissioners, appointment of accreditor staff and leadership, and appointment of visiting team members are open, clear, and well defined and involve meaningful participation from member institutions.*

The accreditor includes member institutions in processes that lead to the appointment of commissioners, accreditor staff and leadership, and visiting team members. Only the meaningful participation of member institutions in such appointments can ensure the responsiveness and transparency of the accreditor. These processes in all cases are clearly defined, consistent, and open.

In addition, system constituent groups organized at the state level are appropriately involved in the recruitment of visiting team members. Such partic-

ipation helps to expand the pool of potential team members, establishing greater system-wide participation in accreditation processes while ensuring the appropriate and inclusive representation necessary for authentic peer evaluation.

*Decisions regarding the accreditation status of individual institutions are discussed and decided with the involvement of all appropriate parties and based on documented evidence.*

Decisions regarding the accreditation status of institutions carry high stakes for those institutions and for the students they serve. If an institution is to receive a sanction, the decision to issue that sanction is justified and supported in terms that are clear and well defined for all parties involved with the institution. The president of any institution whose accreditation status is under consideration is allowed sufficient time to answer accreditor concerns and to speak on behalf of the institution. The chair of the visiting team for the institution is also consulted regarding any deviation on the part of the accreditor from the findings of the visiting team.

*Records and evidence used in making decisions on accreditation status are shared in publicly available documents.*

Decisions regarding accreditation status are based on documentation that is ultimately available to the public. Documented support for a decision regarding an institution's status is produced for public review, thus avoiding any appearance that the decision was arbitrary or unjustified.

*A standard appeal process regarding issued sanctions exists.*

No process that may impact the accreditation status of an institution exists without a means for appeal. The appeal process allows the institution facing sanction to provide evidence of institutional progress and to refute the findings of the accreditor. In order to ensure the integrity of this process, the appeal panel is completely independent of the accreditor and does not consist of the same body or individuals involved in issuing the sanction.

**E. The regional accreditor demonstrates and maintains consistency with federal accreditation mandates and regional accreditor peers.**

*The accreditor implements and applies standards in a manner consistent with federal accreditation mandates and other regional accrediting agencies. The accreditor follows proven and established best practices for accreditation shared among other accrediting agencies.*

The various regional accrediting bodies serving the United States have developed, through many years of experience, effective practices for accreditation based on peer review. The accreditor takes advantage of this experience and employs the proven best practices established by similar bodies.

**F. The accreditor provides quality training to commissioners, visiting team members, and member institutions that is inclusive of all groups involved in the accreditation process.**

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

Because all constituent groups are expected to participate in accreditation processes, members of all campus constituencies require professional development and training regarding accreditation. The accreditor works collaboratively with all constituencies and their statewide organizations to develop appropriate and meaningful training activities and to ensure that such training is readily available and effective.

*The composition of visiting teams includes equitable representation of the various constituencies within the system.*

An accreditation visit represents an evaluation by one's peers. Although an effective visiting team requires members with experience in accreditation processes, this requirement is not allowed to unbalance the composition of the team in favor of specific perspectives or areas of expertise. To ensure that

visiting teams are properly balanced and representative while still including sufficient experience with regard to the content and quality of accreditation reviews, a broad, qualified pool of potential team members is established, trained, and utilized.

**G. The accreditor is responsive to and collaborates with CCC constituent groups.**

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

College presidents, as the administrative leaders of their institutions, clearly have and rightly should have a very significant voice in accreditation processes and in communication with and direction of the accreditor. However, chancellors, vice-presidents, and other administrators, in addition to trustees, faculty groups, staff, and students, all have a substantial interest in accreditation processes and decisions as well. The accreditor is responsive to all constituencies as appropriate in order to fully serve member institutions and the system as a whole.

**H. The accreditor respects the roles and responsibilities of college and system constituent groups.**

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

In any educational institution, various constituencies are granted important roles and responsibilities. All of these roles and responsibilities are respected and supported by the accreditor. The legally granted and proper functions and rights of governing boards, administration, faculty, exclusive representatives or bargaining units, and other constituencies are not undermined by accreditation requirements. The accreditor does not attempt to alter or supersede the defined roles of constituencies within the college but rather accepts and works within the college's structure insofar as that structure is reflective of the

system's requirements and practices as prescribed in statute and regulation.

## **I. Member institutions have a formal process for periodic evaluation of the accreditor.**

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

The accreditor provides a channel for candid input from its member institutions and from all constituent groups regarding both accreditation policies and processes as well as the performance of the accreditor's staff.

*The periodic evaluation of the accreditor extends to all aspects of the accreditor's performance, including but not limited to organizational leadership and decision-making processes.*

The formal evaluation process for the accreditor is not an internal review; it is driven by feedback from member institutions. This review encompasses all accreditation processes and policies, functioning of the accreditor's staff, consistency of decision-making, team selection process, effectiveness of training, responsiveness to feedback, and all other areas related to the accreditor's overall performance.

*The accreditor responds to findings of the formal evaluation in a prompt, thorough, and meaningful way.*

Just as member institutions must respond to the accreditor's recommendations, the accreditor addresses the findings of its periodic evaluation promptly and thoroughly and must demonstrate clear improvement or correction in areas of concern raised by the evaluation.

## **Part IV: Findings & Recommendations**

The following recommendations of the 2015 Task Force on Accreditation are informed by the practices, record, and structure of the other five regional accrediting bodies, which offer, in the view of the task force, a preferable overall format and process to the one currently employed by the Accrediting Commission for Community and Junior Colleges (ACCJC). The recommendations are also informed by the difficult history of actions, process, and climate afforded by the ACCJC.

### **The task force finds that:**

- The structure of accreditation in this region no longer meets the current and anticipated needs of the California Community Colleges.
- The ACCJC has consistently failed to meet the expectations outlined in section three of this report.
- On several occasions the ACCJC has promised changes and has offered reports detailing their efforts to address concerns, but these promises and reports have led to few significant improvements.
- The California Community College system and its member institutions have lost confidence in the ACCJC.

For these reasons, and to address chronic issues, to promote confidence in and respect for the accreditation process, and to position the regional accreditor for the future development of California's community colleges, **the task force recommends the following course of action to the Chancellor and the Board of Governors of the California Community Colleges:**

1. The Chancellor's Office should investigate all available avenues for establishing a new model for accreditation, including options such as the following:
  - a. Form a combined single accrediting commission with community colleges joining WASC Senior College and University Commission, in keeping with the prevalent model for regional accreditation.
  - b. Identify other regional accreditors that could serve the California Community Colleges.



2. The Chancellor's Office should evaluate possible accrediting agents for the California Community Colleges in a thorough yet expeditious manner and, working through the system's established consultation processes, bring a recommendation for action to the Board of Governors by Spring 2016.
3. Until a new accrediting agent for the system is identified, system constituencies should continue to work in a cooperative and proactive manner with the ACCJC to ensure the continuity of the accreditation process for all colleges within the system.

## Part V: Concluding Statement of the Task Force

The central focus of accreditation processes should be on providing excellent teaching and learning opportunities and on academic integrity. The current accreditor for the California Community Colleges has failed to maintain such a focus. Over the past several years, numerous system constituencies have raised consistent concerns regarding various aspects of the accreditation process and the performance of the accrediting commission, especially in areas related to transparency, collegiality, and consistency. This task force finds little evidence that the accrediting commission has the ability or willingness to address these concerns.

In addition, developments such as associate degrees for transfer and the beginnings of a community college baccalaureate degree effort have led California community colleges to become more integrated with 4-year colleges and universities. For this reason, the community colleges system would benefit from a closer, more formalized collaboration with the other institutions of higher education in the region, including service on evaluation teams.

Further delay in resolving the issues with the accreditor will have adverse effects on our colleges, on our students, and on California's economy and future and will prevent the timely development of the robust accreditation structure that other regions enjoy and that California lacks. The task force therefore urges the Chancellor and the Board of Governors to seek other accrediting options that would provide the collaborative and credible approach to accreditation that the California Community Colleges require and deserve.

# Accreditation Task Force Members

## Chair

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### **Pamela D. Walker, Ed.D.**

*Vice Chancellor of Academic Affairs*

California Community Colleges Chancellor's Office

## Members

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### **Stephen Blum, J.D.**

*Trustee*

Ventura CCD

### **Stan Carrizosa, M.A.**

*Superintendent/President*

College of the Sequoias

### **Richard Hansen, M.A.**

*Secretary*

Faculty Association of California Community Colleges

### **Cindy Miles, Ph.D.**

*Chancellor*

Grossmont-Cuyamaca CCD

### **David Morse, Ph.D.**

*President*

Academic Senate for California Community Colleges

### **Meridith Randall, J.D.**

*Vice President of Instruction*

Shasta College

### **Mary Kay Rudolph, Ed.D.**

*Vice President of Academic Affairs/*

*Assistant Superintendent*

Santa Rosa Junior College

### **Ron Travenick, Ed.D.**

*Vice President of Student Services*

Ohlone College

### **Joanne Waddell, M.A.**

*President*

Los Angeles College Faculty Guild AFT 1521

Local 1521