

## ICAS Considerations of Accreditation

### Problem/Need:

- Costly, unfunded mandate of accreditation (time, personnel, research required)
- Inequities of standards for public institutions vs. proprietary institutions
- Absence of genuine faculty representation (on commissions, on visiting teams, etc.)
- Data driven standards
- Limitations of simplistic measurable student learning outcomes

### Investigation:

- Activity in other regions (AAUP Committee on Accreditation)
- Federal legislative issues and pressures
- Requirements for establishing own accrediting agencies

### Available resources

- ASCCC publications and resolutions
- Documents from UC/CSU?
- Other?

### Possible Remedies:

- Federal level:
  - Political pressure regarding HERA (Higher Education Reauthorization Act)
  - Work with CHEA and similar groups
  - Collaborate with national organizations of universities, administrators, etc.
- State level:
  - Meet with WASC/ACCJC together
  - Investigate formation of California agencies
  - Write a joint letter posing questions and requesting answers in writing
  - Seek to increase the representation of faculty on commissions and teams

*The following is an excerpt from the paper THE 2002 ACCREDITATION STANDARDS: IMPLEMENTATION (2004). It is available in its entirety in html or pdf format at <http://www.academicssenate.cc.ca.us/Publications/Papers/AccreditationStandards.html>*

## The Academic Senate's Response to the New Standards

"The function of education is to teach one to think intensively and to think critically. Intelligence plus character – that is the goal of true education."

---Martin Luther King, Jr.

"[T]hink only of the truth of my words, and give heed to that: let the speaker speak truly and the judge decide justly."

---Socrates

Over our history, the Academic Senate has adopted nearly 120 resolutions concerning accreditation, the vast majority collaborative and genial. However, for several years now, the Academic Senate has taken a strenuous and public stance in opposition to the adoption of the 2002 standards; as a result, more than 30 resolutions have been adopted since Fall 2000 in strong opposition to the new standards, their SLOs reliance and "culture of evidence." These resolutions, and as a consequence this paper, speak in defense of the individuality of instruction, and provide specific cautions so that our colleagues and all who care about the ancient traditions of teaching may judge justly and act accordingly.

Certainly, the Senate has not been alone in its objections. Various academic and professional organizations, including the American Association of University Professors (AAUP) and the National Education Association (NEA), have raised concerns about the application of SLOs and corporate values contained within the newly adopted accreditation standards. The Senate finds the standards *fundamentally flawed*, particularly in their requirement that the "institution demonstrates its effectiveness by providing:

- evidence of "institution and program performance" (ACJCC Standards I.B);
- evidence of "the continuous improvement of student learning" (I.B.1);
- requirements that faculty evaluation be attached to "effectiveness in producing those learning outcomes" ( III.A.1.c).

CHEA states that "Accrediting organizations, institutions and programs [are] to provide clear and credible information to the public about what students learn." A substantial difference exists between requiring evidence of a *process* utilizing SLO--and a requirement to demonstrate effectiveness in *achieving* SLOs. In as much as the ACCJC requires evidence of "the achievement" of outcomes and "performance," and seeks to tie these requirements to faculty evaluation, the Academic Senate must offer several notes of caution and advice regarding the new standards.

The Academic Senate has determined:

1. That the compilation of SLOs data cannot begin to encompass the diverse circumstances of our student base. Cultural, ethnic, racial, and individual variances, student mobility, non-traditional class designs, and regional idiosyncrasies cannot be quantified into a stable portrait of student needs over time;
2. That SLOs can produce little meaningful aggregated assessment data for reporting purposes beyond the institution. The implementation of formal assessment, beyond the classroom, involves issues of reliability, validity, feasibility and therefore a requirement for expertise in assessment. The unreliable results of informal local assessments when compounded with erratic demographic information cannot result in valid reportable data;
3. That aggregated SLOs data assembled for reporting purposes cannot adequately represent the complexities of a discipline. In order to aggregate test results, disciplines must be reduced to

vocabulary, processes and informational specifics. Even where holistic grading and portfolio assessments are concerned, results would have to be reduced to simple rubrics, numerical representations, or time consuming narratives that must by necessity conform to reductive reporting criteria. SLOs cannot capture the subjective elements and higher order of critical thinking, including the ability to appreciate, to value, or to judge. SLOs cannot measure the long-term value of extracurricular exploration, and participation, of casual discussions that mature our intellects or of social or aesthetic experiences that expand our visions. Focused as they are on the minute and discrete skills, SLOs are unable to measure the cumulative experience that is education itself;

4. That using SLOs as a basis for faculty evaluations (III.A.1.c) demonstrates an egregious disregard for local bargaining authority and interjects a threatening tone into what the ACCJC claims is a collegial peer process. Moreover, III.A.1.c is particularly coercive to non-tenured and adjunct faculty; and is viewed by the Senate as nothing less than an attack on our profession;
5. That SLOs challenge the tenets of academic freedom. To the extent that a demand for data drives instructional options, academic freedom is affected. If peer review is replaced by standardization of the curriculum and assessment measures and a centralization of authority, academic freedom would be forfeit. The new standards constitute a paradigm shift that privileges assessment over scholarship. Thus, teaching professionals are expected to realign their approaches to instruction with methodologies espoused by external authorities and consultants on assessment planning.
6. That the new standards require compliance with a system based on vaguely defined terminology. As of the publication of this paper, WASC, ACCJC, Academic Senate, and our intersegmental partners have yet to reach agreement on the precise definitions of "Student Learning Outcomes," "Objectives," and other related terminology. Section II.A.6 of the 2002 standards states, "In every class section students receive a course syllabus that specifies learning objectives [emphasis added] consistent with those in the institution's officially approved course outline." As a result of ACCJC representatives having interpreted "learning objectives" as SLOs, confusion exists as to what is being required. Because the new standards represent a shift from inputs to outcomes, and because accreditation is now fixed on test data as opposed to instructional criteria and resources, a *significant* danger exists that faculty will interpret II.A.6 to mean that testing and/or assessment requirements are to be added to Course Outlines of Record. The placing of ill defined SLOs in Course Outlines of Record is part of a slippery slope argument that could result in a loss of academic freedom by moving the classroom toward a less flexible, more standardized approach regarding curriculum and assessment decisions.
7. That the new standards offer minimal reference to local faculty expertise and authority, and thereby relegate their role to providing just one more set of opinions among many. Faculty are the chief architects of curriculum and accreditation self studies, and the diminished references to their standing within this "peer" review process infers a lack of regard to those whose professional lives are given to students and subject area considerations;
8. That the ACCJC is at fault for, ironically, not responding to requests that they provide evidence that SLOs improve student learning. Whereas the value of assessment as an instructional strategy is well established, the validity of aggregated SLOs to produce "continuous quality improvement" at all levels of the institution has not been demonstrated by the ACCJC. Moreover, the Senate takes profound exception that the community college standards were redesigned without addressing the concerns of California community college faculty--by far the largest constituency group subject to ACCJC's accrediting processes.
9. That the new standards are an expensive, untested and unfunded mandate, imposing extensive training and production demands on local full-time faculty who already sit on a range of committees,

teach courses and meet other obligations of their employment.

An additional discussion of the Senate's opposition to the new standards may be found in the 2003 document, "Guidelines," as well as in the various resolutions passed by the Senate, all of which are available at the Academic Senate website (<http://www.academicssenate.cc.ca.us>). While those who advocate a corporate model may be well intentioned, the Senate believes that their opinions embody an Orwellian and intrinsic ethos they themselves have yet to articulate: For them, what cannot be measured cannot be assessed, and what cannot be assessed cannot be controlled, and what cannot be controlled cannot be permitted.

In sum, the Academic Senate objects to aspects of the new standards as unsubstantiated by research, illogical, reductive, expensive, invasive, costly, time consuming, devoid of references to local senate authority and expertise, and insensitive to local bargaining rights.

While the Academic Senate would prefer that accreditation had remained a truly collegial peer review process, some continue to hope that there may yet be opportunities to work with the ACCJC on refining these standards to better address the expectations of all constituent groups. And, as we have seen, while there is no legitimate reason to provide aggregated test results and personal information about students, classes, or faculty to outside reviewers, there is genuine merit in testing at the course and program levels as an instructional strategy. Moreover the use of evidence in planning, perhaps even at the course and program level, in student support services, and with institutional decision making, can represent good practices. If viewed from this perspective, the new standards are a pedagogical planning tool, but they fail as a requirement for external accountability. Despite this ongoing fundamental opposition to the philosophy behind the new standards, the Academic Senate recognizes that local faculty and senates must engage effectively in the new process. What follows provides a brief overview of different approaches to writing the institutional self study.