Inside ACCJC
Conversations with the President about the Challenges, Strategies, Plans, Opportunities and Recent Developments at an Agency-on-the-Move
(Or, “More than you thought you wanted to know about accreditation.”)
April 30, 2019
The Scope of Our Conversation

• National
  • NACIQI, Neg Reg, USDE, C-RAC, AACC, Think Tanks and Critics
  • Innovation and national conversation
  • Use of Data for Community Colleges

• Our Region
  • Survey findings, Workgroups, related organizations
  • New members, incarcerated students
  • Challenges: Enrollment declines, fiscal stability, governance

• The Commission
  • Formative/Summative model; links to philosophy and core values of accreditation
  • Standards Review: Timeline, process, new taxonomy

• The Office Team
  • Data systems upgrade
  • Thinking aloud about the future
  • Expanding member engagement
Terminology

• Regional Accreditors
  • Arose from the academy to empower peer review among related institutions
  • Accredit the entire institution; thus, Title IV federal aid gatekeepers
  • Encompass many types of institutions within their geographical regions

• National Accreditors
  • Serve specific types of institutions, nationally, without regard for location
  • Largely: Career-oriented, often for-profit (ACICS, ACCSC)
  • Faith-based schools (ABHE, TRACS, ATS, AARTS)

• Programmatic Accreditors
  • Aligned with professional or licensure requirements
  • Examples: Nursing, Business, Pharmacy, Psychology, etc. (about >60 of them)
  • Typically, operate only within a regionally accredited institution
Regional accreditation in a picture
In 1885 there was no concept of a community college. By 1962 it was a defined and recognized Higher Education sector. (GI Bill, CA Master Plan.) The Western Association of Schools and Colleges (WASC) established agencies for its three sectors: Senior Colleges & Universities (WSCUC); Community Colleges (ACCJC); and K-12 schools (ACS).
An Overview of the ACCJC Region

• Current membership:
  • 135 accredited members
    • 116 California public colleges; some in 24 Districts
    • 6 University of Hawaii community colleges
    • 5 Western Pacific Island colleges under terms such as Compacts of Free Association
    • 7 Private institutions (5 secular; 2 faith-based)
    • 1 Federal Government institution (Defense Language Institute)
  • Approximately 2.6 million students
  • 2 deemed ”Eligible” to apply for membership (Madera, PUP)
  • Several other Eligibility applications pending
Our Amazing Pacific Islands Members

• PPEC: Who are they?
• “Nation-Building:” Why these institutions matter.
• The Washington Critique: “Bright Line” graduation rates and accreditor’s responsibility to the taxpayers
what the future holds
ACCJC’s Philosophy of Accreditation

These are core principles we believe must permeate all aspects of the accreditation process in order for it to achieve its intended purposes:

• **Collaboration:** Partnering with member institutions in pursuit of a shared goal of quality improvement

• **Safety:** An environment that promotes candor, self-reflection, and honest engagement with needed improvements [“Take the fear out of the system”]

• **Education:** Enduring change happens when there is a shared and deep understanding of the quality principles embodied in the Standards

• **Relationships:** Available, consistent, accurate, trusting engagement among Commission, staff, and institutions is essential when dealing with such consequential matters
Key ACCJC developments since 2017

• “The Portfolio Model” – A Vice President . . .
  • Is assigned as liaison for each member institution
  • Gets to know each institution’s character, issues, people, and history
  • Conducts onsite ISER training; selects and trains the peer review team
  • Provides consistent interpretation / application of standards, approach
  • Accompanies the site team as “advocates for the process”
  • Guides the report through the Commission’s review and action
  • Helps to interpret recommendations to focus improvement efforts

This initiative has been warmly received, resetting many relationships
Key Developments – 2

• Core focus: “Take the fear out of the process”
  • Revised and improved Chair and Team training to reduce uncertainties, play down the “gotcha” fears
  • ACCJC Conference (biennial) to increase contact, flow of information; enhance concepts of a learning community
  • Collaborative, collegial relationships with staff, teams, Commission
  • More reliance on education, less on sanctions, to effect enduring change (see table)
Key Developments – 3

Core value: “Lighten the burden”

• Shorter self-evaluation reports (From >600 pages to +/- 200 pages)
• Simplified annual reports
• Minimal annual dues increases
  • After 5 years of 10%/year, no increase in 2018-19; 2% in 2019-20
  • Discontinued “Special Assessment”
• No charges for VP visits, team VP support, conference pre-sessions
• Fewer Substantive Change requirements
• Smaller peer review teams (from >14 to about 10)
ACCJC Frequency of Sanctions

Colleges Placed on Sanction
Possible Reasons for the Decline in Sanctions

1. Revised Commission action option: Reaffirm full term but with follow-up report
2. Relaxing a too-stringent application of the two-year rule. ("Address the problem before federal policy requires an adverse action under the two-year rule.")
3. Institutions have been prompted to take Commission concerns more seriously – galvanized into action.
4. Clarified educational input, training, has imparted deeper appreciation for the principles embedded in the Standards
5. Collective cultural shifts: “Maybe integrated planning and SLOs really do serve our goals.”
ALO Survey Spring 2019: What progress has ACCJC made in these outcome areas? [75 responses]

<table>
<thead>
<tr>
<th>Outcome 4: Reconstruction of all aspects of peer review team training, including updates to manuals to reflect current ACCJC principles and approaches to peer review, online education, and operational processes to support an effective peer review model.</th>
<th>Significant progress</th>
<th>Moderate progress</th>
<th>Slight progress</th>
<th>No progress</th>
<th>N/A or I'm not sure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>63.5%</td>
<td>18.9%</td>
<td>1.4%</td>
<td>0.0%</td>
<td>16.2%</td>
</tr>
</tbody>
</table>

National Advisory Committee on Institutional Quality and Integrity (NACIQI)

• Accreditors seek renewal of recognition by USDE every five years
• USDE Staff review an agency’s submission; make a recommendation to NACIQI
• NACIQI is appointed by GOP, Dems in House, Senate; also by USDE
• Agency personnel are interviewed by NACIQI, which then makes its recommendation to the USDE Senior Official
• Senior Official considers both staff and NACIQI recommendations then takes the official action on behalf of the Secretary
NACIQI - 2

• ACCJC: A difficult history, beginning in 2013, with protestations from connected sources
• February 2019 meeting postponed ("Government Shutdown")
• Staff’s current recommendation on ACCJC (released in January)
  • Recognition for five years
  • Issues or Problems: None
  • Third-Party Comments: All were supportive
  • Expansion of scope: “not to exceed the bachelor degree level” (Removes limits on number of bachelor’s degrees ACCJC can approve)
• Will be heard in July 2019; NACIQI often follows Department lead
Negotiated Rulemaking ("Neg Reg")

• Opportunity for the USDE to make policy changes through regulatory language, short of the reauthorization of the Higher Education Act (HEA) – which is currently overdue (last authorized in 2008)

• Department makes proposed changes to regulatory language

• Negotiators (from key stakeholders) appointed by USDE consider the proposals in a series of week-long meetings
  • If they reach consensus on issues, that is binding
  • If they do not, the Department can do what it wishes – though may be shaped by the input from the negotiators

• Observers: “Not any chance of consensus in current environment.”
Neg Reg – 2

• Key Issues Proposed and Rejected in the 2019 cycle:
  • All the regional agencies should become national agencies since our warrant of accreditation includes branch campuses and teaching locations outside our region. [Note: We do not “accredit” branches] Rejected
  • Limit regionals to at least 3 and no more than 10 contiguous states. Rejected

Key issues Achieving Consensus

• Accreditors must “respect the mission of faith-based institutions.” Whatever taught or practiced, if linked to faith, can’t be challenged by accreditors. More programs eligible for Title IV.

• For Distance Education:
  • ”Regular and Substantive Interaction” – Defined and approved by accreditor
  • “Instructional team” – defined, approved by accreditor; may involve coaches
Neg Reg – 3

Consensus Issues (continued):

• To support innovation, accreditors may waive one or more of their requirements

• “Direct Assessment” programs: USDE must approve first one; may not require its approval of subsequent ones

• Fewer requirements, easier approval for new accrediting agencies

• Regional accreditors must identify branches outside their region but not required to accredit main campuses outside their region

• “Two-Year Rule” to address non-compliance – extend to three years
Neg Reg – 4

Consensus issues (continued):

• Definitions of credit hour: largely untouched
• Less monitoring of federal matters (Clery Act, FSA, Title IV compliance)
• Expanded aid for incarcerated students
• Accreditors given larger role in making qualitative decisions:
  • Define CBE metrics aligned with credit hour, clock hour calculations
  • Composition of academic team (faculty, coaches, assessment specialists)
  • Define “regular and substantive interaction” in online delivery
• Change “take immediate adverse action” to “follow agency’s policies”
Neg Reg: The high-level reality

The future:

- USDE will post final wording for public comment
- If approved by November 1, will become effective July 2020
- If after November 1, effective July 2021 – but 2020 elections may change many things by then!
- HEA, if approved, may override in statute some of these proposals
- The popular narrative:
  - “Accreditors can now go easy on non-compliance colleges.”
  - “Only the student advocacy groups really care about the students.”
National Issues Impacting Accreditation

• Declining enrollments – locally and nationally
  • Fewer high school graduates
  • Enrollment impacted by the job market
  • Influenced by demographic shifts – away from rural areas
  • Enrollment impacts revenue sources for most schools

• Revised funding formulas for California public colleges
  • Focused on achievement for funding (diplomas, certificates, transfer)
  • Adult education / lifelong learning / enrichment will likely be minimized
Total US Public & Private High School Graduates (Actual and Projected) 2000-01 through 2031-32

Source: WICHE Knocking at the College Door, 2017
Question for Consideration:

As an accrediting agency, ACCJC has four broad areas on influence:

1. **Compliance**: Ensuring institutional quality, integrity, sustainability, and achievement of mission

2. **Education**: Imparting insightful support for the principles of quality improvement through workshops, publications, and training events

3. **Convening**: Creating a region-wide learning community through use of peer reviewers and through conferences to share good practices

4. **Advocacy**: Speaking on behalf of community colleges, impacting the national conversation and legislative community on their key role

Which of these will likely be the most impactful in the next 5 years?
Are performance data agnostic to their use?

• The national conversation is focused on outcomes, primarily on graduation rates, CDR, earnings. This can be useful, but . . .

• Some wish to use the same performance data, across all sectors of higher education, in the interest of “consistency and comparability” of metrics.

• When accreditors petition for renewal of recognition with the US Department of Education, their performance is viewed as an aggregate of their members’ graduation rates.

• The NACIQI review panel looks at a federal accreditor dashboard as the opening point of their inquiry with the accreditor.
Original Accréditor’s Dashboard:

**ACCJC:**

- Graduation & Earnings
  - Green = good outcomes
  - Red = bad outcomes
  - Institutions by graduation rate: 84
  - Institutions by median earnings: 49
  - 94% underperform

**WSCUC:**

- Graduation & Earnings
  - Green = good outcomes
  - Red = bad outcomes
  - Institutions by graduation rate: 65
  - Institutions by median earnings: 29
  - 9% underperform
what the future holds

ACCJC:

WSCUC:
How a Revised IPEDS Dataset looks for ACCJC
## Key Differences (thanks to the RP Group)

<table>
<thead>
<tr>
<th>Measure</th>
<th>Timeframe</th>
<th>Cohort</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal Scorecard</strong></td>
<td>3 years</td>
<td>• Full-time students only*</td>
<td>Earned degree or certificate</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Degree-seeking definition can vary by college</td>
<td></td>
</tr>
<tr>
<td><strong>CCC Scorecard</strong></td>
<td>6 years</td>
<td>• Full-time and part-time students**</td>
<td>Earned degree or certificate; transferred to four-year institution;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Degree-seeking definition is clear and uniform across colleges</td>
<td>and/or became transfer prepared</td>
</tr>
</tbody>
</table>

* Enrolled in at least 12 units in their first term

** Must complete at least 12 units and attempt a math or English course within three years of entering college.
CCC Examples

Large Urban College (~25,000)
• Federal scorecard outcome: **15%**
  • Represents 16% of entering students
• CCC scorecard outcome: **46%**
• Part-time students: 78%
• Pell recipients: 34%
• Promise grant (BOG): 68%

Small Rural College (~5,000)
• Federal scorecard outcome: **9%**
  • Represents 17% of entering students
• CCC scorecard outcome: **37%**
• Part-time students: 69%
• Pell recipients: 49%
• Promise grant (BOG): 78%
Potential New Members

- Prison University Project (San Quentin)
- California Tribal Colleges (Woodland) [Incubation]
- California Indian Nations College (College of the Desert) [Incubation]
- California Preparatory College
- Madera Center of Reedley Community College
Innovations in Development

• A “Formative/Summative” model for comprehensive reviews
  • The college’s self-study is submitted to the review team a semester prior to the site visit for the Team ISER Review (TIR)
  • During the TIR, peer review team conducts a formative evaluation:
    • Verifies compliance with many operational aspects, taking them “off the table” as not requiring onsite verification
    • Specifies areas where additional information is needed, or where the institution needs to further develop its processes, in anticipation of the site visit a semester later
    • Identifies focused “Core Inquiries” that will be pursued during the on-site visit
  • A smaller team (and/or a shorter visit schedule) conducts the Focused Site Visit, with the team report leading to summative findings
  • Endorsed in concept by the Commission January 2019; 3 single-institution pilots, then a district; Advisory Committee to guide development of details
  • More details later in this conference
Visual Representation of the Process

- Team ISER Review
- Core Inquiries
- Focused Site Visit
- Draft Team Report
- Errors of Fact
- Final Team Report
- Commission Action
F/S Pilot Phase Timeline

• February 2019
  • 1st Phase Pilot Colleges – ISER Training (Spring 2021 Team ISER Review, Fall 2021 Focused Site Visit
    • Commission Action – January 2022
• October 2019
  • 2nd Phase Pilot District – ISER Training (Fall 2021 Team ISER Review, Spring 2022 Focused Site Visit
    • Commission Action – June 2022

Full Implementation – 2023
Continuing Challenges:

• Monitoring and ensuring institutional fiscal soundness

• Advocating for performance data appropriate to community colleges
  • Resisting accountability pressures for “bright line measures” that must be imposed by accreditors; pressures not to accredit low-performing schools
  • Able to tell multiple stories about varied student goals
  • Protecting our vulnerable Western Pacific institutions from inappropriate judgment

• Refining the process:
  • District-level recommendations via the colleges: Can we improve?
  • “Right-sizing” peer evaluator teams
The voices of the critics: What would you say?

• “Regional agencies, with their geographical scope, are anti-competitive; schools should be able to choose their accreditor regardless of location.”

• “What good is accreditation if it can’t prevent misbehavior? For-profit schools still are predatory and suddenly shut down!”

• “If students had the right performance information, they would choose the good schools, putting the low-performing ones out of business.”

• “Accreditors should bear responsibility for high costs, heavy student debt, loan defaults, Title IV non-compliance, and low post-graduation earnings.”

• “Regional accreditors prevent transfers of credit from nationally accredited schools; they are protecting their elite schools and stifling innovation.”
National accreditation-related issues – 1

• Changing student demographics; under-prepared students
• Loss of confidence in higher education
• Cost, debt, ROI, loan forgiveness
• New forms of learning and delivery (3rd-party non-institutional providers, MOOCs, Boot Camps, badges, etc.) Who accredits these? Title IV eligible?
• Increases in part-time, adjunct faculty; control of academic processes
• Diversity; protecting DACA
• Access versus completion
• Fiscal monitoring of financially troubled institutions
• Sudden institutional closures and teach-out agreements/plans
National accreditation-related issues – 2

• The role of the state in the Triad (USDE + Accradiator + State); NOTE: California does not have a State-level office of higher education

• Governance issues: Political influence on boards; board conflicts with CEOs; trustee training; qualifications to serve on boards

• Use of data: Misguided “accountability” measures by Washington, think tanks; vulnerability of community colleges in the national debate

• Role of the federal government in view of increased Title IV investments; implications for the HEA reauthorization; the “federalization” of accreditation

• Some are advocating for differential/risk-based accreditation
Looking Ahead at ACCJC.

• Executive Search
  • Preparing for a July 1, 2020 leadership transition
  • Goal: Preserving the vision, values, and innovations

• Creating an enduringly valuable, long-term relationship with our members
  • Continuing to refine the process
  • Standards review and revisions
  • Policy updates in view of Neg Reg and HEA reauthorization

• Increased participation on the national scene
  • CHEA, C-RAC, AACC, ACCT
  • Publications about community college accreditation
Thank you!