**Date:** September 6, 2013

**From:** Academic Senate for California Community Colleges  
555 Capitol Mall  
Suite 525  
Sacramento, CA 95814  
Tel. (916) 445-4753  
Fax (916) 323-9867  
Email: [info@asccc.org](mailto:info@asccc.org)  
Web site: www.asccc.org

**To:** AccreditationCommittees@ed.gov

**Subject:** Written Comments re: Accrediting Commission of Community and Junior Colleges.

**Preamble**

The Academic Senate for California Community Colleges (ASCCC) is a statewide, democratically elected organization that represents 113 California community college academic senates. The mission of the ASCCC is to foster the effective participation by community college faculty in all statewide and local academic and professional matters; develop, promote, and act upon policies responding to statewide concerns; and serve as the official voice of the faculty of California Community Colleges (CCC) in academic and professional matters. The Academic Senate works to strengthen and support the local academic senates of all California community colleges.

By California Code of Regulations (Title 5 §53200(b)), the primary function of academic senates is to make recommendations with respect to academic and professional matters, one of which is “Faculty roles and involvement in accreditation processes, including the self-study and annual reports.*”* Given this official responsibility, our member senates are extensively involved in the accreditation process at their colleges, and, as their statewide organization, the ASCCC not only supports them in their accreditation work locally but also seeks to identify and report collective challenges experienced by member senates with accreditation and, when appropriate, to make recommendations to the ACCJC for improving the general accreditation process.

All California community colleges are accredited by the Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges (ACCJC). Thus, all of our member academic senates work within the ACCJC’s accrediting umbrella. For these reasons, the ASCCC is qualified to offer commentary during ACCJC’s recognition review.

**Introduction**

California community colleges, indeed virtually all institutions of higher education, operate within a participatory governance model in which various constituencies such as faculty, administrators, and students are able to voice their perspectives and participate in institutional decision-making. This notion of shared constituent responsibility applies not only to the institution in its day-to-day affairs, but also in its accountability efforts to external audiences. As an organization, the Academic Senate for California Community Colleges represents and supports faculty as a constituency and believes that faculty must be meaningfully included in all aspects of the accreditation process. Over the last decade, the ASCCC has identified and shared its concerns about the lack of faculty on accreditation visiting teams and the ACCJC’s own committees. Unfortunately, despite repeated efforts, we have seen little progress by the ACCJC on addressing this serious concern. From our view, the ACCJC appears to be out of compliance with the Secretary’s Criteria for Recognition §602.15(a)(3) regarding the inclusion of faculty on visiting teams and the ACCJC’s own committees. We urge the National Advisory Committee on Institutional Quality and Integrity (NACIQI) to evaluate the ACCJC’s proposal for re-recognition carefully in this area.

**Lack of Compliance: 602.15(a)(3)**

**§602.15(a) The agency has --**

**(3) Academic and administrative personnel on its evaluation, policy and decision-making bodies, if the agency accredits institutions.**

**Summary**

Since 2004, the Academic Senate has repeatedly shared with the ACCJC its members’ views about the need for adequate faculty representation on visiting teams and other evaluation, policy, and decision-making bodies of the ACCJC. Over this time period, neither our organization nor member senates have seen significant or lasting progress in accomplishing the important goal of including adequate academic personnel on such bodies. From the Academic Senate’s experience, the ACCJC appears to be out of compliance with the Secretary’s Criteria for Recognition §602.15(a)(3).

**Discussion**

As an organization, the ASCCC takes positions on academic and professional matters through official resolutions. Through a democratic elections process, resolutions are considered and may be adopted by member delegates at two plenary sessions a year. Multiple resolutions regarding the need for adequate faculty representation on visiting teams have been adopted over the last decade.

In Fall 2004, the Academic Senate “urge[d] the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC) to ensure that faculty comprise a minimum of 25% of the site visiting teams.” In Spring 2009, an adopted resolution noted, “there is still no consistent process to assure all visiting teams include faculty” and resolved that that Academic Senate “work to ensure that the entity that accredits the California community colleges adopt a policy that requires, and develop processes that ensure, that all visiting teams include a minimum of three faculty.” The ACCJC’s lack of a specific policy for how accreditation visiting teams should be composed was again noted in a Spring 2009 resolution which requested that the Academic Senate communicate to the ACCJC the need for it to explain its processes “including how individuals are selected to serve on accrediting teams.” (**See Exhibits 1, 2, and 3.**)

To address the issue of faculty representation on visiting teams, ASCCC leadership has communicated several times with ACCJC leadership. In Spring 2005, then-ASCCC President Kate Clark met with ACCJC President Barbara Beno. In a follow up letter, President Clark summarized the Academic Senate’s concerns about faculty representation and appointment to visiting teams:

1. The importance of including on visiting teams “knowledgeable faculty who are actively involved in the campus life and have an awareness of contexts beyond their own college—not faculty who are seen as the pawns or personal selection of local administrators”;
2. The necessity that faculty members be actively serving in that role: “it is essential that faculty team members actually be faculty—not merely once-upon-a-time teachers, librarians or counselors who are now performing some other function for the college”
3. And disappointment that the ASCCC and ACCJC “could not return to the mechanism of former days, when local senates could nominate directly to our organization, and we, in turn, could forward those names directly to you.” (**See Exhibit 4.**)

In 2011, then-ASCCC President Michelle Pilati again offered to work with ACCJC leadership on faculty participation on visiting teams, “We look forward to sitting down with you [ACCJC] and brainstorming ways that the Academic Senate might assist you in identifying experienced faculty to serve on ACCJC’s visiting teams. While the practice of the Academic Senate involvement in nominating faculty for visiting teams has occurred in the past, we are pleased to learn that you are willing to have us play that role again, working with us to ensure that we have a rich diversity of faculty on visiting teams.” (**See Exhibit 5.**)

The Academic Senate is also concerned about the ACCJC’s failure to follow its own stated policies with regard the appointment of faculty to its committees. On May 25, 2010, then-ASCCC President Jane Patton wrote to the U.S. Department of Education, Office of Postsecondary Education that the ACCJC’s written policy on the composition of the Commissioner Selection Committee (CSC) included faculty appointments to the CSC from the Academic Senate for California Community Colleges or Hawaii Community College Academic Senate Chairs, but, to her knowledge, the Academic Senate had not been asked to make any appointments to the CSC over a seven year period. (**See Exhibit 6.**)

In the resolutions and communications above, the ASCCC’s use of the terms “faculty” or “faculty member” is close to the USDE’s use of “academic personnel” in Criteria for Recognition §602.15(a)(3). The Academic Senate Bylaws, Article 1, Section 1 defines “faculty member” as “any employee of a community college district who is employed in an academic position that is not designated as supervisory or management.” This definition includes tenured, tenure-track, or part-time instructors, counselors, and librarians. Although this particular wording is specific to the bylaws of the ASCCC, this understanding of who are considered faculty is near universal throughout the California Community Colleges system. Because they supervise or manage others, vice-presidents and deans, even deans of instructional divisions, would be considered administration, not faculty. In the USDE’s *Guidelines for Preparing/Reviewing Petitions and Compliance Reports*, “academic” is defined as “someone currently or recently directly engaged in a significant manner in postsecondary teaching and/or research.” Research is not typically a part of the mission of community colleges, but CCC faculty are directly engaged with students in the classroom, in academic and career counseling sessions, and in the library. Thus, the ASCCC’s use of the term “faculty” is the closest analog to “academic personnel.”

**Conclusion**

According to a California Community Colleges Chancellor’s Office staffing report[[1]](#footnote-1), 66.8% of CCC employees are faculty (tenure/tenure track, or academic temporary). It is the view of the Academic Senate for California Community Colleges that accreditation processes are most effective and fair when faculty are meaningfully included on visiting teams and policy making committees of the ACCJC. Despite the fact that the ACCJC’s *Policy on Commission Good Practice in Relations with Member Institutions* indicates that ACCJC will “include educators, academics, administrators and members of the public on evaluation teams” and the ACCJC’s *Team Evaluator Manual* describes visiting teams as having “several faculty members, academic and student services administrators, a chief executive officer, a trustee, a business officer, and individuals with expertise and/or experience in learning resources, distance/correspondence education, planning, research, evaluation, and baccalaureate programs,” the Academic Senate, as reflected in its resolutions, has not seen significant progress by the ACCJC to ensure adequate representation of knowledgeable faculty on either visiting teams or the ACCJC’s policy committees. From the ASCCC’s perspective, the ACCJC is currently out of compliance with the Secretary’s Criteria for Recognition §602.15(a)(3).

With the concerns described above, the Academic Senate for California Community Colleges respectfully asks the NACIQI to review the ACCJC’s adherence to CFR §602.15(a)(3) and, if found out of compliance, to delay the decision to extend ACCJC’s recognition for one year to allow the ACCJC to demonstrate compliance with CFR §602.15(a)(3).

**Exhibit 1**

**Resolution 02.04 (Fall 2004): Minimum Faculty on Accreditation Site Visit Teams**

Whereas, The 2002 Accreditation Standards for California Community Colleges require specified Student Learning Outcomes and assessments; and   
  
Whereas, The Student Learning Outcomes are written, coordinated, managed and integrated through a faculty-driven process;   
  
Resolved, That the Academic Senate for California Community Colleges urge the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC) to ensure that faculty comprise a minimum of 25% of the site visiting teams; and   
  
Resolved, That the Academic Senate for California Community Colleges reaffirm its support in the recruitment and training of faculty for accreditation site visits.

**Exhibit 2**

**Resolution 02.03 (Spring 2009): Developing Processes for Faculty Participation on Accrediting Teams**

Whereas, The Academic Senate for California Community Colleges and the Accrediting Commission for Community and Junior Colleges (ACCJC) have recognized the need for faculty participation on the ACCJC visiting teams;

Whereas, Resolution 2.04 F04 asserts the faculty desire to participate on visiting teams and asks that the ACCJC "ensure that faculty comprise a minimum of 25% of the site visiting teams";

Whereas, There still is no consistent process to assure all visiting teams include faculty; and

Whereas, As the ACCJC develops accreditation processes, a process should be established that assures faculty members will always be included when creating visiting teams;

Resolved, That the Academic Senate for California Community Colleges work to ensure that the entity that accredits the California community colleges adopt a policy that requires, and develop processes that ensure, that all visiting teams include a minimum of three faculty; and

Resolved, That the Academic Senate for California Community Colleges does not recognize the authority of visiting teams that do not include the required number of faculty.

**Exhibit 3**

**Resolution 02.04 (Spring 2009): ACCJC Communications**

Whereas, The Accrediting Commission for Community and Junior Colleges (ACCJC) states in its bylaws that its purpose is to assure "that an institution has clearly defined objectives appropriate to higher education; has established conditions under which their achievement can reasonably be expected; appears in fact to be accomplishing them substantially; is so organized, staffed, and supported that it can be expected to continue to do so;"

Whereas, The ACCJC's communications regarding accreditation findings fail to express clearly those conditions that have led to negative findings and may result in colleges not addressing their most urgent issues in a timely manner;

Whereas, The faculty of the California community colleges have expressed questions and concerns regarding the ACCJC's objectives and how it goes about achieving them, asking the Academic Senate for California Community Colleges to "research and document the evolving composition of the ACCJC and of accrediting teams, particularly with regard to the numbers of and balance between faculty and administrators"(Resolution 2.05 F02), "urge the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC) to ensure that faculty comprise a minimum of 25% of the site visiting teams." (Resolution 2.04 F04), and "request of and work with the ACCJC to evaluate accreditation team training and college visitation schedules to consider faculty assignments and accommodate classroom obligations." (Resolution 2.01 S07); and

Whereas, The ACCJC website prominently provides information as to how third parties can make complaints and provide input regarding the institutions the ACCJC accredits;

Resolved, That the Academic Senate for California Community Colleges communicate to the Accrediting Commission for Community and Junior Colleges (ACCJC) the need to clearly express its objectives and the processes it employs in achieving them, including how individuals are selected to serve on accrediting teams and how accredited institutions can submit complaints regarding the ACCJC or its findings and be assured of due process with respect to such complaints;

Resolved, That the Academic Senate for California Community Colleges encourage the ACCJC to explain clearly and fully any deficiencies when data aimed at satisfying the ACCJC requirements are found to be lacking and to provide guidance to the college so that the college can address the ACCJC's most urgent concerns in a timely manner; and

Resolved, That the Academic Senate for California Community Colleges work with other constituency groups to inform the ACCJC of any deficiencies that exist in its means of communicating its findings to colleges and how it might improve its communications and ultimately the outcomes achieved at the institutions it accredits.

**Exhibit 4**

June 27, 2005

Barbara Beno

Executive Director

Accrediting Commission for Community and Junior Colleges

Western Accrediting of Schools and Colleges

10 Commercial Blvd

Novato, CA 94949

Dear Dr. Beno:

I wish to follow up with our productive conversation, held in your offices this past February. Greg Gilbert and I appreciated the time you and Dr. Deborah Blue made for us, and we believe that your comments have been well received across the state, especially given our most recent Academic Senate publication on accreditation, adopted at our plenary session April 11, 2005. I will see that you are provided with a hard copy as soon as it is published in the next few weeks, although it is available online at http://www.academicsenate.cc.ca.us/Publications/Papers/AccreditationStandards2005.html

During our conversations, we spoke about our desire to work with you and your organization to foster credibility in your efforts and faith in its ultimate findings. We spoke at the time how important it was that visiting teams include knowledgeable faculty who are actively involved in the campus life and have an awareness of contexts beyond their own college—not faculty who are seen as the pawns or personal selection of local administrators. More importantly, it is essential that faculty team members actually be faculty—not merely once-upon-a-time teachers, librarians or counselors who are now performing some other function for the college. To that end, we agreed that you would send to the Academic Senate a copy of the notice sent to local California Community College presidents each spring, or that you would request from our offices a copy of the current list of local senate presidents so you might contact them directly. In that way, you could be assured that college presidents spoke with the local senates, and that the local senates could assist in verifying names and nominating new faculty to serve in this very crucial capacity.

We were sorry that we could not return to the mechanism of former days, when local senates could nominate directly to our organization, and we, in turn, could forward those names directly to you. Perhaps we can build toward such a trusting relationship in the future by following through with our agreement this spring. To date we have not received notification to share with local senate presidents, nor have we received a request from your offices for our current list.

We continue to wish to build a collaborative relationship with your organization and see this as a vital first step. We look forward to hearing from you soon.

Most cordially,

Katherine W. Clark

President, Academic Senate for California Community Colleges

**Exhibit 5**

February 23, 2011

Barbara Beno, President

ACCJC

10 Commerical Blvd., Suite 204

Novato, CA 94949

Dear Barbara:

First and foremost, thank you for your partnership with the Academic Senate for California Community Colleges. We hope that this was a good experience for you and will lead to increased understanding between our groups and more opportunities for collaboration. Your participation in our event raised the bar for this year’s institute increasing the inclusiveness of our attendees and we are extremely grateful.

We look forward to sitting down with you and brainstorming ways that the Academic Senate might assist you in identifying experienced faculty to serve on ACCJC’s visiting teams. While the practice of the Academic Senate involvement in nominating faculty for visiting teams has occurred in the past, we are pleased to learn that you are willing to have us play that role again, working with us to ensure that we have a rich diversity of faculty on visiting teams.

Finally, let us add that having you and Susan at our event provided a richer, deeper understanding of the accreditation process beyond our expectations. You have a great staff! I sincerely hope that our institute revealed the expertise of our presenters and the dedication that faculty have for the accreditation process at our local campuses.

Yours truly,

Michelle Pilati

Academic Senate President

Julie Adams

Executive Director

Michelle Grimes-Hillman

Accreditation Committee, Chair

**Exhibit 6**

May 25, 2010

Kay W. Gilcher, Director

Accreditation Division

U.S. Dept. of Education

Office of Postsecondary Education

1990 K St NW

Washington, DE 2006

Dear Ms. Gilcher:

As the President of the Academic Senate for California Community Colleges, I am a member of the California Community Colleges statewide Consultation Council Task Group on Accreditation. As you know, the Consultation Task Group wrote to you recently to express our concern about the processes being used to select commissioners. That complaint indicated that the ACCJC bylaws have not been followed regarding the selection of commissioners.

I am writing you today to point out another concern regarding the ACCJC’s bylaws. According to article III section 4, the commissioner selection committee is supposed to include faculty members appointed by the Academic Senate for California Community Colleges. The bylaws say the following:

The Commissioner Selection Committee shall consist of seven members including at least two administrators, two faculty members, and two representatives of the public. The Commission Chair shall appoint three Commissioner Selection Committee members, two from the Commission and one from the private institutions it accredits, and will designate one to be the chair. The Pacific Postsecondary Education Council shall appoint one member. The Academic Senate for California Community Colleges, the California Chief Executive Officers, the California Community College Trustees, and the Hawaii Community College Academic Senate Chairs shall appoint whatever additional faculty, administrators, and representatives of the public are required to complete the composition of the Commissioner Selection Committee. The Committee shall be constituted in the spring of each year. The President serves as the nonvoting secretary to the committee.

To our knowledge, the Academic Senate has not been asked to appoint members for at least seven years. Given that at least two members must be faculty, and that 113 of the colleges under ACCJC are in California, it would stand to reason that the Academic Senate should have made appointments during seven years. While you are investigating the appointment processes of the commissioners, perhaps you can also inquire about the processes for appointing faculty members to the commissioner selection committee.

Thank you for your consideration.

Sincerely,

Jane Patton

President, Academic Senate for California Community Colleges

1. California Community Colleges Chancellor’s Office. (Fall, 2006). *Report on Staffing for Fall 2006: Statewide Summary.* URL: http://employeedata.cccco.edu/statewide\_summary\_06.pdf [↑](#footnote-ref-1)