

THE 2002 ACCREDITATION STANDARDS: IMPLEMENTATION

The Academic Senate for California Community Colleges

Research Committee 2003-04

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Abstract

Because the Accrediting Commission for Community and Junior Colleges (ACCJC), a division of the Western Association of Schools and Colleges (WASC) has now adopted the new accrediting standards over our many objections, this report was constructed with three separate thrusts: (1) it accounts for Academic Senate positions and continuing faculty concerns with and objections to the current accreditation approach; (2) it provides a summary of the experiences of the colleges who piloted the new standards; and (3) it provides practical, pragmatic assistance to local senates who must address the new Student Learning Outcomes (SLO) requirements and accommodate the shifting paradigm required for completing the self study. All of these approaches consider why and how the accreditation process should occur within boundaries of local senate governance and with due attention to institutional missions, local bargaining authority, privacy protections under the law, academic freedom, and common sense. The paper concludes with recommendations for local senates and contains useful resources and models within the appendices.

Introduction

In June 2002, the Accrediting Commission for Community and Junior Colleges (ACCJC) approved new accrediting standards which went into effect for academic year 2003-2004. Where the former ACCJC standards adopted in 1996 offered a checklist against which an institution's provision of adequate educational resources was considered, the new standards require demonstration of a "culture of evidence," relying principally on Student Learning Outcomes (SLOs). The Academic Senate for California Community Colleges fundamentally opposed this radical change in philosophy.

Accreditation in California Community Colleges is a faculty-driven process that requires institution-wide participation. Title 5 (Sections 53200-53204) is clear that accreditation requires collegial consultation. Local senates, working with college presidents, develop self study plans, committee structures, and arrange for faculty appointments to chair and/or co-chair each standard. California's community colleges place an emphasis on faculty involvement, both at the policy and implementation levels, so that educational processes and support services may be maximized in support of the institution's mission. The entire accreditation process, beginning with the institutional self study and including visits by an accrediting team, is intended as a peer examination, which is submitted to the Western Association of Schools and Colleges (WASC).

WASC, which includes the Accrediting Commission for Community and Junior Colleges (ACCJC), is a private, non-profit organization supported through its assessments of member institutions. Though not a governmental organization, its authority derives from federal acknowledgement. WASC's validation of institutional integrity and good practice is recognized by prospective students and institutions with whom California's community colleges articulate courses and degrees as well as by federal and state agencies who provide student aid funding.

With the advent of ACCJC's new 2002 standards, three California community colleges piloted the first self studies and received evaluation reports from the ACCJC in July

2004. In preparation for their self studies, representatives attended ACCJC training and in some instances served on visitation teams to other colleges. Individual faculty attended breakout sessions on current accreditation issues at the Academic Senate's Fall 2003 Plenary, reviewed materials provided by the Academic Senate at its website <academicsenate.cc.ca.us> and in print, and attended SLOs workshops with such organizations as the Research and Planning Group for California Community Colleges (RP Group). The RP Group also presented two SLOs breakout sessions at the Academic Senate's Spring 2004 Plenary, as well as a keynote presentation.

This paper advances philosophical and ethical responses to the 2002 standards that reflect Academic Senate positions adopted during several years of discussion. Because the ACCJC has now enacted the new standards, this paper focuses both on the Academic Senate's general opposition to the standards and how to work with the standards at the local level in support of students, institutional missions, and processes of collegial consultation. Local senates must balance these two approaches: continued philosophical opposition with effective implementation.

Finally, this paper is the result of many Academic Senate resolutions. Resolution 2.08 F02 requires the Academic Senate to develop a position paper on the outcomes/assessment movement. Several other resolutions gave further direction to those producing this paper. Readers are urged to review this and other relevant resolutions in Appendix E.

Accreditation and the Outcomes Movement

In 2002, ACCJC adopted accreditation standards that, when compared to their previous 1996 standards, embody a sea-change in the expectations by which community colleges are to be assessed. Formerly, accreditation self studies offered painstakingly thorough evaluations of institutional success through narratives and documentation that verified the achievement of specific goals and established bench marks for local planning. They required that institutions document the provision of adequate resources in a wide variety of educational areas. This approach contributed greatly to the overall success of California community colleges in responding to the varied needs of the largest and most diverse postsecondary system of education in the world. Where the former standards invited validation of processes that supported local missions, the new standards require evidence, SLOs, and the expectation that they will be used to demonstrate continuous quality improvement – regardless of whether students are provided with adequate resources. The result will be a "culture of evidence."

The new standards for accreditation are intended not merely as a reporting mechanism, but as an institutional way-of-life, a "culture of evidence" wherein an institution determines its operating decisions based on measurable evidence. This change represents a radical shift in the underlying philosophy of accreditation. The four new standards are:

- I. Institutional Mission and Effectiveness
- II. Student Learning Programs and Services
- III. Resources
- IV. Leadership and Governance

The outcomes movement, itself, is founded on a non-academic production model that equates education with manufactured goods. This model establishes a mission, designs strategies for implementing the mission, and tests to evaluate evidence of the institution's effectiveness at fulfilling its mission. When applied to higher education, the results are reductive and intended to form the basis for decision-making within the classroom, program and institution levels. As Elder (2004) laments, "TQM (total quality management) has arrived, and with ideological fervor – along with a whole host of other corporate type quality improvement methods, such as CQI (continuous quality improvement)" (p. 91).

Outcomes-based accountability efforts in education are largely a response to demands by the federal government, specifically the U.S. Congress's desire to align public funding with assurances of quality and adequate workforce preparation and training. The very valid threat today is that peer review could be replaced by direct government oversight.

There are six national accrediting organizations and their conduit to the federal government is the Council for Higher Education Accreditation (CHEA). CHEA serves as the nexus between the government (federal and state) and accrediting organizations on issues of quality assurance and accreditation, and their goals for the reauthorization of Higher Education Act can be viewed on <http://www.chea.org/Government/5-03%20Reauthorization%20Agenda.pdf>. At present, CHEA is an advocate of peer review and ostensibly opposes the federal government's efforts to get into the business of setting uniform standards and measures within higher education and centralizing authority away from individual institutions. As a compromise, however, CHEA has endorsed a student learning outcomes approach.

In a CHEA published document, Eaton (2003) writes:

To bridge the divide between accreditation and government, four actions can be helpful:

- The accrediting community, institutions, and programs develop and share additional evidence of institution and program performance;
- The accrediting community, institutions, and programs develop and share additional evidence of student learning outcomes;
- The accrediting community shares additional information about the "findings" or results of accreditation reviews; and
- The federal government affirms the principle of decentralization of judgments about academic quality based on performance and outcomes: Primary responsibility for defining expectations and evidence performance and student learning outcomes rests with the institutions and programs. (p. 17)

While the Academic Senate views CHEA's overall "Statement" as problematic in several areas, the non-controvertible reality is that outcomes are and shall likely remain central to institutional accountability for the foreseeable future. In a document dated December 3, Rothkopf (2003), chair of CHEA's board, stated, in non-ambiguous language:

To maintain the privilege of being the arbiters of quality for their own field and to

continue to merit public trust in the enterprise, leaders of higher education are holding themselves accountable to the public by providing hard data about effectiveness. Indicators of student achievement and success are playing an increasingly critical role in determining which programs and institutions merit the accreditors' seal of approval.

Being “accountable to the public” in an effort to “merit public trust” is a reasonable disclosure requirement of publicly funded institutions and has always been a part of the accrediting process under prior standards. Now, however, questions emerge as decisions result from collected and aggregated “evidence.” This issue will be explored further within the section of this paper entitled, “The Academic Senate’s Response to the New Standards”; however, the point remains that statistics (Samuel Clemens’ “damned lies”) are subject to interpretation by legislators, by the Department of Finance, and by various other entities who in spite of their distance from local classrooms and campuses, exert tremendous influence over the funding of local programs and facilities. Where the “public trust” is concerned, the Academic Senate believes that local faculty and administrators are better prepared to make decisions that serve the wider needs of students than are remote politicians and accountants – regardless of how well intentioned they may be.

The academic and corporate models discussed elsewhere in this paper will demonstrate that where contractual agreements, the compilation of data for external review, and the collection of names to ensure “effective participation,” are concerned, we are observing a corporate model. When an autocratic and corporate model takes hold and accountability becomes standard operating procedure, when collegial consultation is weakened, and when enrollment priorities are determined primarily by marketplace considerations, the stage is set for a decline in the teaching of anything but the “marketable.” While faculty struggle to comply with the new standards, the closer the standards get to the classroom, the greater is the need for vigilance about the uses of accountability for a potential redesign of the community college system. In that regard, the Senate remains dedicated to helping faculty safeguard our colleges from an encircling “culture of evidence” and marketplace ideologies.

Student Learning Outcomes (SLOs)

The SLOs requirement represents two sides of an equation: expectations and measures. Expectations include the determination of goals, outcomes, and objectives determined at the course, program, services and institutional levels: *goals* assume students will be provided materials, instruction, and facilities; *objectives* are the knowledge and skills for which students will be held accountable; *outcomes* are the evidence of accountability.

According to the ACCJC, Student Learning Outcomes are the “knowledge, skills, abilities, and attitudes that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences” (ACCJC Standards Adopted 2002, Standards Glossary). While ACCJC language suggests that many educational elements are measurable, it is unlikely institutions can accurately quantify “attitudes” or anything as amorphous as “abilities.” As a result, the standards embody a reductive

approach to accountability, and many argue that the practice moves local community colleges ever closer to standardization.

Certainly, the ACCJC has said that it opposes standardization, but the very real possibility exists that accountability has placed institutional planning and oversight on a very slippery slope that demands the vigilance of everyone.

At the 2002 Academic Senate Leadership Institute, Regina Stanback-Stroud, former Academic Senate President, discussed the current national formation of public policy and how ideology often substitutes for substantive discourse. She noted the anti-intellectualism prevalent in today's society as demonstrated by assaults on tenure, the keep-it-simple approach to critical analysis, the preference of ideology and anecdote over sociology and science, and the determination that public education's funding be founded on tests, education as an anti-intellectual enterprise.

As a former nursing and pharmacology instructor, and a former dean of workforce and economic development at Mission College, Stanback-Stroud appreciates the need for accountability, but she also stressed the importance of not reducing all education to mere outcomes. **Accreditation's shift from inputs to outputs is an attempt to create a circumstance in which "everyone learns the script and saying it makes it so."** Critics who ask "Why would faculty *not* want to be accountable?" require us to respond with a call for reasoned and informed discourse in the formation of public policy on accountability.

One approach to this emphasis on accountability is exhibited by the No Child Left Behind (NCLB) program within the K-12 system. NCLB's high stakes mandated assessment has given rise to an industry of test designing, proctoring, assessing, textbooks and supplemental materials that favors a cottage industry but offers little benefit to students. The approach with NCLB is quantitative, not qualitative, and the resultant blizzard of testing statistics is providing data for politicians, grant writers, and entrepreneurs who would privatize all education. Consulting firms are created to intervene with failing schools, offer conferences to raise test scores, train new administrators, and assess teachers whose students are not making the grade. This national imposition of testing and its resultant money trail came into being without student-centered research or a substantive dialogue with educators: the financial impetus at the heart of this movement is all too apparent.

The alternative, collegial approach demands that the local faculty establish self study guidelines, limits, and objectives related to academic and professional matters from the very beginning of the process. Because the new standards represent an unfunded mandate and can impact faculty workloads, early involvement is essential. Bakersfield, Grossmont and Cuyamaca Colleges, for example, adopted statements of principle that informed all their work. Bakersfield College's approach will be discussed in detail later; see Appendix D for the sample resolutions taken by the other two colleges' local senates.

Faculty must address a range of student/faculty privacy issues, academic freedom, scholarship and instruction to preserve our principles so that education itself does not

become subservient to a “culture of evidence.” While SLOs design may assist in some areas of instruction and course planning, the first order of business is instruction. Furthermore, "measurable outcomes" are unlikely to account for a range of social and aesthetic components of education, for intellectual exchange and intellectual growth. **Time devoted to obtaining “evidence” does not serve students as well as time devoted to instruction,** even when the two are not mutually exclusive. By seizing the initiative on the design and coordination of SLOs at all levels, faculty can help an institution, its programs and courses to work holistically and thereby diminish the occasion for ill-conceived outcomes to be artificially imposed.

Local Senate Authority and Accreditation

Clearly, then, the accreditation process must be faculty-driven. Local faculty authority in academic and professional matters is founded in the legislative intent language of Assembly Bill 1725, in Education Code and Title 5; those mandates take precedence over ACCJC’s processes--if and when local senates determine those processes to be in conflict with the best interests of their profession, their governance authority, their students, and their educational missions.

After AB 1725 decoupled community colleges from K-12 and repositioned them within the state’s *Master Plan for Higher Education*, minimum qualifications were raised and probationary periods were extended for tenure-track faculty. Peer review was attached to faculty evaluation, and funding was established for professional development. Significantly, to underscore the status of community college faculty as a postsecondary partner, faculty authority was extended to the ten-plus-one areas requiring collegial consultation and serves as the basis for college governance policies established between local senates and their governing boards. Within the ten-plus-one, accreditation is item seven. Title 5 regulation identifies the following areas as requiring such collegial consultation:

1. Curriculum, including establishing prerequisites
2. Degree and certificate requirements
3. Grading policies
4. Educational program development
5. Standards or policies regarding student preparation and success
6. College governance structures, as related to faculty roles
7. **Faculty roles and involvement in accreditation processes** (*emphasis added*)
8. Policies for faculty professional development activities
9. Processes for program review
10. Processes for institutional planning and budget development
11. Other academic and professional matters as mutually agreed upon

As some faculty participating on accreditation self study teams may be less familiar with "collegial consultation," a brief review is warranted here. To consult collegially means that the district governing board shall develop policies on academic and professional matters through either or both of the following mechanisms:

1. Rely primarily upon the advice and judgment of the academic senate, OR

2. Reach mutual agreement by written resolution, regulation, or policy of the governing board effectuating such recommendations.

Regardless of whether a local senate has primacy or mutual agreement authority with reference to item seven, local faculty expertise is vital to the completion of a successful self study. **Local faculty must safeguard academic freedom, preserve local senate authority with regards to academic and professional matters, and develop SLOs that do not undermine local senate authority, curriculum design, or academic freedom.** SLOs, further, affect other areas of assigned authority: prerequisites, degree requirements, grading, as well as student preparation and success. This point will be considered in the next section, particularly as it concerns assessments.

Philosophies of Assessment: Politics, Conundrums and the Local Senate

“Via ovicipitum dura est.” [The way of the egghead is hard.]

---Adlai E. Stevenson

The ACCJC defines assessment as “Methods that an institution employs to gather evidence and evaluate quality” (ACCJC Standards Adopted 2002, Standards Glossary). Assessment and accountability have always been fundamental to the teaching profession. **The Academic Senate for California Community Colleges endorses the use of a multitude of traditional measures.** The Senate supports authentic assessment that demonstrates progress over time, assessment that is valid, reliable, and feasible, assessment that encourages students to reflect on their efforts, and assessment that does not narrowly define the student base into a one-size-fits-all approach. Though the question has been raised by some as to the usefulness of traditional measures, the Academic Senate document, “The New Accreditation Standards--Guidelines for the Field” (hereafter referred to as the “Guidelines”), endorses their use and suggests that local senates emphasize “the value of existing methods of assessing learning and . . . the measures, such as grades, that these methods generate.” Further, the "Guidelines" note, One can find the statement of desired learning objectives in every catalog course or program description, in course outlines of record, and in virtually any instructor’s syllabus. The latter, when done well, will also contain statements of the standards by which student work will be judged, and the measure of the achievement of student learning is reflected in the assigned grade at the end of the term.

Traditional measures, for the Academic Senate, continue to have a distinguished place in academe. At the 2002 Fall Plenary Session, the following adopted resolution reinforced the ideal that determining measures for student learning is an area of faculty primacy:

Resolved, That the Academic Senate for California Community Colleges urge local senates to assert the right and responsibility of faculty to determine appropriate measures of student learning and achievement (such as grades, certificates, and degrees), and that absent “clear showing” of the inadequacy of current measures, faculty need not develop additional outcome measures simply to satisfy the Accrediting Commission for Community and Junior Colleges (ACCJC) requirements for continuous documentation and improvement of student learning outcomes. (2.01. F02)

While local senates and course instructors may decide to expand their approaches to planning and assessment, it is reasonable that they work within their expertise and employ time-tested traditional measures if that is their desire. What follows though, is a rather thorny question: Can such traditional assessments provide data that most external stakeholders would value?

With the establishment of ACCJC 2002 standards and SLOs requirement, discussion of assessment frequently extends beyond the classroom to the subject of external stakeholders. E. M. White considers the “different and sometimes conflicting demands placed on assessment by different interest groups”:

teachers want assessment to be personal, individual, supportive of their own teaching styles and curricula, and—most important—not coercive. But ruling bodies and the publics they represent want from assessment the opposite. . . . [T]hey want normative numbers, success rates of groups, and ways of identifying failing students and incompetent teachers. Students make yet a different set of demands: they ask for immediate feedback from tests that seem fair and reasonable, that examine what they have been taught. Like the teachers, students resist assessment that interferes with learning or is merely bureaucratic or punitive; like the government, they want consistent measures that are determined not by teacher subjectivity but by clear standards. (p. 301)

Some assessments may serve the interests of ruling bodies, courses, and students; placement exams that match students to appropriate course levels are one such example. But teachers rightly object to assessments that simplify course materials and subjects in order to measure learning outcomes. Moreover, assessments that work in one class may not work in another. What kind of assessment do teachers want? White, whose expertise in writing assessment may be generalized to most academic areas, notes that teachers want:

- Assessment that supports their work or at least does not deny its importance
- Assessment that recognizes the complexity of writing and of the teaching of writing [or most academic subjects]
- Assessment that respects them as professionals and their students as individuals
- Assessment that will not be misused to provide simple, damaging, and misleading information. (p.14)

According to White, **teachers favor assessment that is sensitive to individual needs, resistant to numerical reduction, and involves faculty in scoring and individual responses to students.** In addition, feedback to students must be timely and qualitative. Thus, requirements for external accountability should be consistent with best practices and represent an “expanded version of classroom assessment” (p. 14). As White notes, the pedagogical implications that emerge from faculty preferences in assessment designs raise these questions:

- How can large-scale assessments be consistent with teachers’ judgments of individual students?
- How can students and teachers receive useful and constructive feedback from

assessments?

- How can assessments support collegial work among faculty members and supportive relations between teachers and students?
- How can assessments provide or give the appearance of providing the data sought by other interest groups without becoming reductive or interfering with teaching and learning?
- How can teachers control . . . assessment so that it is not used for purposes contrary to their interests? (p.14)

Unfortunately, an assessment that places the individual student and the individual classroom practice at the center of its design will not likely produce results consistent with the needs of external interest groups. White opines that, though important, the teacher's perspective omits "too many matters of urgent importance to other interest groups" (p.15). Therein exists the conundrum for local senates; in brief, how to satisfy accreditation requirements without narrowing the curriculum and diminishing the vitality of a responsive, individualistic and dynamic classroom experience. If best practices in individual classroom assessment and external accountability are represented by a Venn diagram, their overlap would narrowly center on simplistic and reductive aggregates, but the larger incongruent ellipses would divide between two cultures: academic and corporate. These and other related issues will be discussed in the following section. Meanwhile, where some sections of this paper begin with a quotation, this section will conclude with one:

"We are not victims. We are the largest, hardest working, most creative postsecondary system in the world."

---"Guidelines"

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.

Approaches to Writing the Self Study: From the Academic Senate, ACCJC, and the Field

"What we have to learn to do, we learn by doing."

---Aristotle

"Education is what survives when what has been learned has been forgotten."

---B. F. Skinner

The Academic Senate Recommendations: According to the Academic Senate's 1996 paper, *Faculty Role in Accreditation*, "Strong faculty leadership in the development of the self study is of utmost importance to its integrity. The local senate should be involved in the development of the self study plan, including the committee structure," and

appointment of "faculty to the self study committees." The paper proposes a model that remains a standard today: "The subcommittees, one for each standard, are chaired by a faculty member or by a faculty member and either an administrator or classified staff person sharing responsibilities. Faculty serving as chairs or co-chairs should be appointed by the local senate (see Title 5§53206) in consultation with the college president."

The college president normally assigns the role of Accreditation Liaison Officer (ALO) to an administrator, though faculty members do serve in this position at some colleges. The ALO acts as a contact person for the ACCJC and visiting team and serves as an administrative liaison for the faculty responsible for completing the self study.

Generally, one or more faculty are selected by the local senate to oversee the self study process. The study's Lead Faculty Chair establishes and coordinates committees who contribute to the self study, assists in the collection of data, and oversees the writing of the final draft of the self study. Because of the range of responsibilities assumed by local faculty in creating the self study, not to mention their importance to an institution's overall accreditation effort, it is appropriate that they be granted sufficient reassigned time, according to local governance and contractual agreements.

An additional faculty role emerging with the new standards is the Learning Outcomes/ Assessment Coordinator (LOAC). Whereas the ALO and local senate are responsible for specific and periodic accreditation tasks, such as the production of an institutional self study, the LOAC's responsibility is ongoing. If the new standards assume that measures will guide planning at all institutional levels, the permanent role of outcomes and assessment coordinator is essential. Additionally, because of its cross-curricular nature and potential influence on all segments of instruction, this position is rightfully a faculty position appointed by the local senate; it, too, deserves appropriate stipends and/or reassignment considerations (Senate resolution 2.02. F03).

The Current ACCJC Recommendations: As with the former accreditation process and its ten standards, the current approach still entails pre-planning, a self study report, and accreditation team visits. An important difference, however, according to Darlene Pacheco, recently retired ACJCC Associate Director, (LACCD Accreditation Retreat, October 24, 2003), is that the new standards and their subsections need not be addressed in the self study in a sequential and linear perspective, but, rather, as the result of discussions that lead to emphatically ordered narratives that reference, fairly thoroughly, the guidelines. Pacheco explained that the new standards and guidelines are not intended as a template for self studies, but rather as starting points for an institution-wide dialogue. Individuals responsible for the self study work together and not in isolation. Though the opportunities afforded by such communication advances institutional planning, this process places new pressures on participants to meet and work toward consensus on such complex and unfamiliar issues as large-scale assessment, outcomes, and a myriad of related considerations.

In the October 2, 2002 edition of the ACCJC newsletter, *Accreditation Notes*, Pacheco writes about institutional dialogue:

Unlike *debate*, in which most academicians are trained to seek to score points and to persuade, the goal of dialogue is mutual understanding and respect. Dialogue involves active listening, seeking to understand, giving everyone the opportunity to talk, and trying not to interrupt. A conscious commitment to engage in *dialogue* ensures that a group welcomes a range of viewpoints during its search for effective ways of addressing important issues. Retaining the use of a facilitator can help ensure that the ground rules are maintained and can help clarify themes and ideas.

The ACCJC, in an attempt to provide assistance to the field, has conducted visitations, workshops, and created reference materials available at their website www.wascweb.org. The 2003 *Self Study Manual*, the *Draft Guide to Evaluating Institutions*, the July 15 Draft of the *Accreditation Handbook*, as well as the 1997 *Guide to Self Study*, the former standards for accreditation are available on this site. ACJCC has also announced plans to establish a bulletin board website for Accreditation Liaison Officers.

The Observations of the Field: All three of the colleges piloting the new standards, MiraCosta College, College of the Siskiyous, and Santa Monica College, reported being told that what is wanted are models of measurements; several of their ALOs expressed frustration at standards they viewed as confusing and impossible. By July of 2004, the three California colleges had submitted their reports and received their responses. Comments made at the ACCJC June meeting and a general overview of their response to the studies are contained in the following section.

As the colleges wrote their self studies, information surfaced. Dave Clarke, Academic Senate President at the College of the Siskiyous, provided the ACCJC with a close reading and marginalia for the guidelines on Standard IV. This document is available at <academicsenate.cc.ca.us> under presentations provided at the 2003 Fall Plenary by the Research Committee. In it, Clarke points out, quite rightly, that some of the ACCJC's supportive materials appear ambiguous and confusing. Subsequently, the college's faculty raised their concerns with representatives from the ACCJC, resulting in substantive discussions with ACCJC administrators.

To the field, Clarke offers the following advice:

- Don't have many voices writing responses to individual bullets. Have the standard chairs be the primary writers. Each standard committee's member can be a resource to go get information and to function within focus groups. The chairs should get reassigned time since they will be doing the writing.
- Beware of giving chairs responsibility without authority. This is less of a problem if the first suggestion is followed.
- While surveys can be of value, we had trouble fitting many of the bullets into a survey instrument, and I felt the results of the survey were of very little value. Rely more on focus groups for information.
- While the self study should be faculty controlled, don't be leery of including the administrators. They have the best global view and often the most accreditation experience.

- We were constantly assured that (1) we could fold redundant topics into one narrative and then refer to that narrative when necessary [and] (2) [the ACCJC was] looking for “dialogue” and “discussion.” What they didn’t realize is that the new standards (and the guidebook) are formatted in a way that makes us want to revert to the old ‘address each and every bullet’ way of doing things. We (both ‘newbies’ and ‘old-timers’) couldn’t make ourselves feel comfortable leaving something ‘unaddressed.’ So that’s what we tried to do. And that’s why we got frustrated in realizing that every little substandard in IV seemed to require a rehashing of our planning process. Were we doing this over today, we’d write holistic narratives for each standard. For example, the section on presidential leadership might have a single narrative at the beginning – perhaps with portions of it cross-referenced to specific sub-standards. I’m not sure how the evaluation and plan sections would tie into this, but our frustration was with the redundancy in the descriptions. The results of focus groups work nicely with the need to report in narrative form.

Though the new standards and the ACCJC’s recommendations for completing the self study represent a major change in accreditation requirements, help is also available through the Academic Senate for California Community Colleges in its papers and "Guidelines," its website and plenary meetings, and by exploring such external links as are provided in the appendices of this report. That said, faculty are well advised to **question the intent of all resource materials and their potential for simplifying the role of instruction**, especially when those materials are not designed by faculty or by groups with fiduciary self-interests. Care must be taken to not supersede the local faculty’s primacy in determining the design of local course and program outcomes.

General Comments on ACCJC's Responses to the Pilot Self Studies

“I think we have a need to know what we do not need to know.”

---William Safire

Comments at the June 2004 meeting of the ACCJC concerning the piloted studies were summative and general in nature. According to ACCJC leadership, several colleges had begun to include SLOs in program reviews and curriculum design. Each college made a conscientious effort to address every question. While the standards are intended to promote ongoing dialogue--before and after the writing of self-study--the ACCJC noted that planning efforts should establish when dialogue transitions into the actual writing of the self study.

The ACCJC also concluded that while faculty tended to take an active role, some administrators did not – with one administrator referring to the new standards as a “fad.” At one college, SLOs progress was set aside by a governance debate, and, generally, team leaders agreed that most everyone is still “stuck” on the old model. Self studies tended toward redundancy and a compliance model rather than a model that encourages improvement. Chief Executive Officers and Chief Instructional Officers requested a checklist for areas such as external audits to streamline the process. Generally, the ACCJC acknowledged that all colleges are at a beginning phase with the new standards.

While the piloted self studies exhibit an earnest attempt by participating colleges to respond to the new standards, one remaining area of dissension is the connection of employee evaluations to the achievement of stated student learning outcomes (III.A.1.c.). In an attempt to address this issue without being overtly combative, self studies allude to bargaining agreements and negotiations. At the same time, several self studies attempt to placate the ACCJC by acknowledging that as course outlines, program review, and approaches to instruction, as reflected in course syllabi, employ SLOs, these shifts will be reflected in employee evaluations. One college's evaluation report contains a disturbing recommendation that “the college clarify, develop, document and regularly evaluate the roles of individuals and constituent groups in college governance and decision-making structures and processes to ensure their effective participation and communicate the processes and outcomes to the college community as the basis for continued improvement.” This intrusion into contractually bargained matters underscores the need for faculty concern—and for local senate's collaboration with their exclusive bargaining unit.

Measuring Institutional Effectiveness: Wherein Local Senates Exercise Primacy

“The best tool yet devised for the improvement of society is freedom.”

---Frank Church

Institutional effectiveness is an assessment of how proficient a college is at fulfilling its mission and serving students. While the ACCJC standards fail to give proper recognition to local senate authority, we know that the faculty are not just one group among many. Faculty authority in academic and professional matters, as discussed earlier, plays a key role in institutional effectiveness. This authority, when coupled with subject-area expertise and faculty prevalence in a college's academic life, positions local faculty as the natural arbiters of quality education at an institution. While local colleges have their individual approaches to collegial consultation, the four new standards invite an exploration of the relationship between the mission and governance.

At the foundation of the accreditation process, the institutional mission is the thesis statement to which everything in the self study must refer. The mission, if it employs concrete and specific language, is more than a noble ideal; it is a board-adopted policy, a contract and a promise. Local senates are well within their authority to center their professional attention on fulfilling that promise. Where mission statements are prosaic, vague, and non-specific, local senates should join with their entire college community and begin the work of creating a new one.

Questions regarding the creation of a mission statement:

- What is the mission promising?
- Is the mission comprehensive?
- Who does the mission serve?
- What feedback mechanisms are in place to help the mission deliver on its promises?
- How well does the mission match with the institution's master plan? Does the plan need to be revised?

- Is there an effective role for local governance in support of the mission?

Within the college's mission and board policies are ideals that point toward student success – and when faculty hold the institution accountable to its mission, they can connect the mission/vision to a plan that defines the particular community being served and matches that community to specific services, such as counseling, tutoring, and instructional programs. In addition, faculty may consider quality control issues as they relate to the promises of the mission. If the mission guarantees educational excellence to diverse students and accompanies that with assurances of quality control and comprehensive planning, then it is vital that the institution, as part of its planning process, categorize and define the elements that support its mission (Copper Mountain College Mission/Vision Matrix, Appendix B).

Bakersfield College's academic senate adopted a philosophy on October 22, 2003 that focuses on assessment and overall institutional effectiveness. It states that "learning is more than simply acquiring knowledge; it involves mastery of subject matter, the application of that knowledge, discovery and utilization of resources, and solving of problems. The entire campus works together to support student growth and development for life long learning." Bakersfield College follows the Nine Principles of Good Assessment (see Appendix C) and utilizes outcomes assessment not only to consider student learning, but as a measure of "the success of the institution in providing effective learning opportunities." The statement goes on to say that assessment is faculty led, a curriculum matter, and that the "Academic Senate has primary responsibility for establishing and maintaining the general standards for classroom assessment at Bakersfield College. Specific assessment standards and methods are the responsibility of individual departments and faculty members."

The Bakersfield philosophy focuses on the application of assessments and is committed to assessments that are valid, reliable, relevant, and "generated through multiple measures to collect both quantitative and qualitative information, in an effort to improve courses, services, and programs," and improve institutional effectiveness. According to the Bakersfield senate, the "data will provide evidence for curriculum reform, planning, resource allocation, organizational leadership, and staff and student development. Ultimately BC [Bakersfield College] assessment will lead to institutional accountability and improvement of teaching and learning." The statement concludes that the "assessment process, however, is not a part of faculty evaluation, which is addressed separately in the KCCD [Kern Community College District] Policy and Procedures and the CCA [Community College Association] contract."

Institutional effectiveness is more than a philosophical approach; it begins with the details of the initial design and application of SLOs at local campuses. With this in mind, the Cuyamaca College Academic Senate approved a resolution that requires local senate oversight on the development and implementation of SLOs in all areas related to collegial consultation (Appendix D). Cuyamaca's determination to take action early in the process has placed them on a proactive footing rather than a reactive one. Thus they are doing precisely what a local senate should do by asserting their primacy in matters that affect

their classes, programs, services – and students. Accreditation in California community colleges is a faculty-driven process that requires institution-wide participation. Local senates are well advised to launch the processes for establishing the guidelines for defining, identifying and assessing SLOs in the curriculum approval and program review processes and in close cooperation with student service programs.

Given the time-intensive efforts to devise and implement SLOs, local senates are well advised to follow Bakersfield's example and the examples of Cuyamaca and Grossmont (Appendix D). Faculty may chose to create a mission matrix, as did Copper Mountain (Appendix B), and/or follow the recommendations set out in Senate resolution 2.01 S04 to take a central role in the discussion and coordination of SLOs activities campus-wide. As local faculty seize the initiative, they diminish the opportunity for outcomes to be imposed without first having gone through a proper process of consultation. Considerations involved in the determination of how to approach assessment are discussed in the following section.

Course-Level Assessment

“Use fewer examinations, fewer quizzes, and more essay assignments. You don't know anything about a subject until you can put your knowledge into some kind of expression.”

---Wayne C. Booth

Assessment exists at the course-level for a myriad of purposes distinct from its uses at the program and institutional levels. For example, an instructor may employ a pop quiz as incentive for students who appear to be lagging behind or as a means of acquiring a snapshot of student knowledge at a specific time. Also, course-level assessment may rightfully consider such individual student circumstances as personal tragedies or other obstacles that inhibit steady and predictable academic progress in the short-term. When assessment is indistinguishable from individualized instruction, it does not necessarily fall within the province of the accreditation report any more than does the identity of individual instructors. Thus, it is appropriate that the course instructor is the ultimate authority on what assessment criteria will be shared in the self study and what will not.

While there is a broad range of approaches to assessment, planning should always consider the desired outcomes, the time required to implement the assessment, the materials involved, how the assessment's results are to be used, how well assessment aligns with and contributes to instruction, and most important: its benefit to students. A prolonged consideration of assessment practices is beyond the immediate scope of this paper, but a brief discussion will reveal something of the range of options available to faculty, beginning with direct assessment and indirect assessment. **Direct assessment** examines specific skills and or knowledge, as with a performance or content-specific examination, while **indirect assessment** is more general, as with retention and transfer information. Direct assessment may include criterion-referenced tests to measure specific levels of knowledge or mastery; norm-referenced tests to evaluate students in relation to the performance of others (holistic writing exams); and portfolio assessments which include a collection of artifacts centered on demonstrating the acquisition of specific skills over time. Assessment planning that is looped into instruction offers the additional

benefit of focusing lessons on what one expects students to learn.

Regardless of the assessment methods employed at the course level, where course-level assessments are used, they must by necessity be **valid and reliable**, as the new accreditation standards also note: “If an institution uses departmental, course and/or program examinations, it validates their effectiveness in measuring student learning and minimizes test biases” (ACJCC Standards. II.A.2.g). A brief discussion of “validity” may help to illustrate several of the concerns involved in the design of assessments.

Validity asks if the assessment measures what it claims to measure. For example, in the discourse of assessment, validity may be **predictive** if it attempts to predict how well a student will perform in a given situation, as when a college placement exam attempts to predict how well a student will perform at a certain course level. **Concurrent validity**, however, refers to the degree of agreement between scores arrived at on different tests of the same skills. While predictive validity predicts and concurrent validity correlates or compares, **face validity** assumes an assessment is valid by how it appears, on the face of it, to the assessor. Face validity is a questionable forum for serious assessment, but it can be used as a starting point for choosing an appropriate method of assessment, particularly where colleagues may collaborate on designing a rubric for a holistic grading session (a process where assessors agree to a rubric, are normed to it, and join together in a common or holistic effort to score submissions).

Where predictive, concurrent and face validity are concerned with the outcomes of an assessment, **content validity** relates to the appropriateness of a test’s content and procedures, as with the content of a placement exam and its cut scores. While content validity relates to a test’s subject area content, **test bias** relates to its potential affect on the test taker. An exam may by virtue of an ill-conceived prompt be insensitive to some groups. If, for example, an exam involves a consideration of alcoholism and the test taker has been recently traumatized within a relationship with an alcoholic, it is reasonable to expect that negative personal experience could produce biased answers, particularly where essay questions are involved. Thus, professional organizations, such as the Educational Testing Service (ETS), that create tests for large-scale distribution are ever mindful of biases regarding gender, race, culture, and individual circumstances that could skew an exam’s content validity.

While it is advisable to consider the content validity of an exam, its overall construct is important as well. **Construct validity** is the extent to which an assessment embodies a theory of practice, as when exams that test writing skills match current writing theories that allow for recursive processes of drafting and revision. For example, one would not expect the results of a multiple choice exam to demonstrate adequately one’s skills at playing the violin. While measurable outcomes are desired by various ruling groups and external assessors, the collection of data should never be at the expense of meaningful instruction. A valid assessment is trustworthy and provides, as nearly as possible, the students and the institution with an honest picture of student preparation at a given time.

Finally, **consequential validity** embodies all of the above definitions of validity and

attempts to unify instruction and learning with student progress. An example of consequential validity might involve the appropriateness of a student having been placed in a course as a consequence of placement exams cuts.

As previously stated, the new standards may increase the focus on what constitutes a valid and useful assessment, but **not every assessment needs to be reported in the institution's self study**. It is also important to remember that ALL testing data that identifies specific classes or individuals, faculty or students, must remain separate from reportable outcomes. This is particularly true with regards to instructor evaluations—regardless of what appears to be language to the contrary within the standards: “Faculty and others directly responsible for student progress toward achieving stated student learning outcomes have, as a component of their evaluation, effectiveness in producing those learning outcomes” (ACJCC Standards. III.A.1.c).

According to Darlene Pacheco, former ACJCC Associate Director, the ACCJC is fully aware that evaluations fall under the province of bargaining. While the standards seek to make SLOs a centerpiece of instruction and assessment, the ACJCC understands that it cannot supersede contractual agreements. Certainly, **in the event that SLOs data is collected and aggregated, it must be without reference to specific classes, students and its instructors** (see Senate resolution 2.01. F03 in Appendix E). Even in those circumstances where only one or two class sections are offered of a specific course, the information can be aggregated, no matter how inconclusive the aggregate is when applied to planning, so that all references to individual students and instructors are, rightfully, removed.

These assurances must be in place as state legislators and agencies demand district-level accountability on "state priorities." As stated earlier, both in the “The Academic Senate’s Response to the New Standards” and “General Comments on ACCJC’s Responses to the Pilot Self Studies,” the responses to the self studies posit a desire to collect information concerning “individuals and constituent groups in college governance and decision-making structures and processes to ensure their effective participation.” The simple reality is that steps must be taken to safeguard privacy prior to the establishment of SLOs and the collection of data – and this is accomplished by local senates taking the lead through the resolution process and by facilitating holistic discussions throughout their local campuses.

Protecting Student Confidentiality

Because the ACCJC has instituted a SLOs reporting requirement at the level of the classroom, the confidentiality of students must extend beyond grades to testing procedures and results. Protection of confidential student information, consent of participants, guarantee of anonymity, and recognition of one’s right to withdraw participation are enumerated under the Family Educational Rights and Privacy Act (FERPA). This act affords students certain rights with respect to their educational records, including the “right to consent to disclosure of personally identifiable information contained in the student’s education records, except to the extent that FERPA authorizes disclosure without consent” (<http://www.ed.gov/policy/gen/guid/fpco/ferpa/ps->

officials.html). Exceptions have to do with legitimate administrative duties, requests by law enforcement, and the transference of records between postsecondary institutions—but not for accreditation purposes.

The rights of test takers have also been addressed by the American Psychological Association's (APA) and may be viewed at their website: www.apa.org/science/ttrr.html. Their commentary offers the following regarding confidentiality:

Because test takers have the right to have the results of tests kept confidential to the extent allowed by law, testing professionals should:

1. insure that records of test results (in paper or electronic form) are safeguarded and maintained so that only individuals who have a legitimate right to access them will be able to do so;
2. should provide test takers, upon request, with information regarding who has a legitimate right to access their test results (when individually identified) and in what form. Testing professionals should respond appropriately to questions regarding the reasons why such individuals may have access to test results and how they may use the results;
3. advise test takers that they are entitled to limit access to their results (when individually identified) to those persons or institutions, and for those purposes, revealed to them prior to testing. Exceptions may occur when test takers, or their guardians, consent to release the test results to others or when testing professionals are authorized by law to release test results;
4. keep confidential any requests for testing accommodations and the documentation supporting the request.

Section 601 of Title VI of the Civil rights Act of 1964 states that no person shall be denied benefits or subjected to discrimination “under any program or activity receiving Federal financial assistance.” In as much as most colleges receive federal aid and come under Title VI regulations, assessments that affect minorities may be subject to Title VI review. The right to equal protection under the law is guaranteed by the Fourteenth Amendment to the Constitution, and in as much as a college degree may be a condition of employment, issues of validity, equity, and confidentiality should be part of the process of gathering SLOs.

Program-Level Assessment

Of primary importance is the recursive and collaborative interactions that need to occur between programs and courses. Indeed, course and program level SLOs should reflect a sense of cohesiveness and unity. Where education may be viewed by some as a dysfunctional household with individual faculty residing primarily in their offices or within the sanctuary of closed classrooms, program level collaboration offers faculty an opportunity for participation within a community of scholars. Through the process of program review, for example, faculty may create a unifying vision of their program's core values and thereby determine how to coordinate instruction and assessment and create assessments that are reliable beyond the individual classroom. Indeed, whether a program confers a degree, a certificate, or preparation for state boards and/or the workplace, a unified and coordinated approach to instruction and assessment can turn a

sequence of classes into a program. Measures may include how students are tracked (performance in transfer courses, the workplace, on state boards, etc.), and, in turn, findings can contribute to additional course and program planning, particularly when assessments are **reliable**.

While validity means honesty in assessment, **reliability means consistency**. Convincing, consistent results confirm the validity of an assessment for both teachers and students, but reliability involves how well the findings of an assessment will hold up under differing conditions, conditions that exist beyond the sanctuary of the closed classroom. A student may be assessed at one level within a specific class setting, but if that same student were to take a challenge exam devised by a committee of instructors, would the results be similar? Thus reliability is an appropriate consideration at the program-level. Examples may include challenge exams, holistic grading sessions, portfolio readings, and placement exams.

When faculty work together to design and administer agreed-upon exams, they are, in effect, creating a cohesive and unified academic program. Such an effort is not only valuable for the students but for the faculty as well. In creating a program review or designing an exam, faculty may jointly consider content, issues of articulation, transfer, Title VI conventions, information competency, equity and diversity, relationships between programs and course offerings, pass rates at state boards, and their personal philosophies of testing and assessing. Holistic grading offers rich opportunities for collegial collaboration.

Since the 1980's, common grading sessions have been viewed as the great communal activity for those who would otherwise have remained cloistered and insulated from program and institutional planning. A notable example involves holistic grading sessions employed by college and university writing programs.

As college classrooms in America became more diverse, as with open enrollment in New York's City College during the mid 1960's, writing instructors had to adjust to the complexity of an expanded set of variables that accompanied second language learners and people of varied educational and cultural backgrounds. The monolithic drill and skill approaches that had been used to teach a more homogeneous society were no longer adequate. For more information on the resultant paradigm shift in the teaching of writing, consult M. Shaughnessy's *Errors and Expectations*. What followed was a process movement that began to view errors not as failings but, rather, as areas worthy of attention. Researchers began to study writers in the act of composing and discovered that writing is a way of thinking and involves discovery, revision, and, finally, editing and presentation. As a result, the teaching of writing began to focus not so much on errors but on writing processes. An additional result, however, was a growing disparity between faculty who taught grammar based courses and those who taught process oriented approaches to writing.

Composition and assessment scholars such as E. M. White began to advocate for assessments that take construct validity into account and suggested that multiple-choice

grammar tests do not adequately measure one's writing skills. One problem with writing assessment, however, is that it involves an exceedingly complex set of variables. In common grading sessions, some instructors would favor content over errors while others would fail an essay for a pattern of comma splices. Obviously, there was a schism forming within the composition classroom, and holistic grading attempted to bridge that divide.

Holistic assessment offers writing faculty a forum wherein they can address their various perspectives on instruction and grading with colleagues. By having to agree on an essay prompt and a rubric, they are, in effect, reaching consensus about what is important in the teaching and assessing of writing. Participants in a holistic session begin by reading a collection of common papers and discuss them against an agreed upon rubric. **Interrater reliability**, agreement among readers on scoring criteria, when high, satisfies a need for consistent, valid, and reliable scoring. Once a general consensus on scoring is reached, readers begin to score student essays, each essay having two readers. Where there are discrepancies, a third reader will enter a score. The process is relatively simple, and prompts and rubrics are readily available from testing services and on the Internet, though, certainly, they can be designed in-house.

While holistic grading sessions offer more valid predictors of writing skills than grammar exams, issues of content validity continue to exist when the writing being graded is the product of a limited time frame and a potential for testing anxiety. Hence, such scholars as Edward M. White and Peter Elbow advocate portfolio approaches, though portfolios need not be confined to composition instruction.

Portfolio assessment is a method for measuring a student's progress over time by compiling a collection of his or her work. Ideally, a portfolio will not only demonstrate student progress, but will include assignment criteria, grading rubrics, student statements of intent, examples of student work, reflective commentary by students, and instructor responses. When used beyond the classroom, portfolios will normally involve simple check-off forms and places for a brief narration by the rater. Ideally, within the portfolio, reliability can be established by employing consistent measurements over time. Portfolios have the potential, also, to encourage a sense of community among instructors as they negotiate criteria, values, and assumptions about instruction and subject matter. Finally, and perhaps most important, they may allow for authentic assessment.

Authentic assessment, also known as performance assessment, involves an engaged role for the student in a manner not provided by more traditional and indirect approaches to assessment in that it considers the student's performance of the process itself, as in a writing assignment that builds from discovery writing to a presentation draft. Well executed portfolio assessment offers students opportunities to become independent and critical thinkers and validates instruction as an extension of a student's learning experience. Portfolio assessment, as opposed to a singular test, is superior as the assessment itself is the student's course work.

Naturally, the feasibility of designing a valid and authentic portfolio plan involves issues

of cost, time commitments, and assessment strategies, particularly when it is intended for use at the department and/or program level. Some training on assessment must be involved, forms and rubrics must be developed, and time must be allowed for scoring. As with holistic scoring, though, the use of portfolios provides an enhanced role for interdepartmental planning, student and instructor autonomy with regards to course dynamics, and authenticity in the learning process, but the cost in time and resources can be daunting. A more comprehensive consideration of assessment options is contained toward the end of the following section.

Student and Support Services Assessment

In response to the new accreditation standards, student services are also expected to specify SLOs and then administer assessments to see if students have actually acquired these outcomes. This requirement is especially challenging. First, the student service “side” on any campus is composed of a set of functions, each of which provides a unique but important service to students. Some of these functions (e.g., guidance and career courses taught by counselors) may readily produce important learning outcomes, but the design of measures may not be so apparent within other areas of student services (e.g., admissions and records). Second, since the arrival of the new standards, attention and discussion has been focused almost solely on instruction; student service units and function have received little, if any, attention.

Marilee Bresciani, an assessment expert at North Carolina State University, is the source for much of what follows. She has two pieces of advice for those just getting started. First, as colleges begin the process of specifying and measuring SLOs, it is best to see student services and instruction as mutually supportive partners who coordinate their efforts to help students learn. With this in mind, as they begin identifying outcomes, student service faculty and staff may wish to include some institutional or “core” learning outcomes that student services, as well as the instructional side, contribute to students. Second, in specifying SLOs and corresponding assessment tools and strategies, start slowly, begin in small steps, and keep it simple. For the first year, concentrate and identify and measure just one-to-two outcomes per student services function/unit; to do more risks taking on far too much work and inconclusive results.

The following steps may move individual units within student services toward a meaningful plan for assessing their contribution to SLOs:

1. Review the standards. Section II.B which covers expectations for Student Support Services and notes early-on, “The institution systematically assesses student support services using student learning outcomes, faculty and staff input, and other appropriate measures in order to improve the effectiveness of these services.” Specifically, “The institution provides an environment that encourages personal and civic responsibility, as well as intellectual, aesthetic, and personal development for all of its students,” and “The institution designs and maintains appropriate programs, practices, and services that support and enhance student understanding and appreciation of diversity.” These outcomes should be kept in mind when preparing a unit plan.

2. Begin the dialogue. Call for a series of meetings of those who work in the specific student services function/unit.
3. Discuss and write a mission statement for each unit. The unit mission statement might be based partially on the college's mission statement, the division's mission statement, and/or the purpose statements of a professional organization associated with the unit's function. For example, "The mission of student government is to promote leadership skills." "The mission of the Health Office is to promote healthy lifestyles among students, faculty, and staff."
4. Write the unit's objectives or goals. The unit objectives should reflect the unit mission statement and describe various learning opportunities the program provides for students. Some examples. "Student government will provide opportunities for students to develop and improve leadership skills." "The Office of Student Activities will provide events and speakers to promote a better understanding and appreciation of cultural and ethnic diversity."
5. Discuss, list, and prioritize the unit's learning outcomes. Learning outcomes are statements describing what students are expected to know and/or be able to do as a consequence of the service provided by the unit. Learning outcomes are the end results, the "deliverables" so to speak. Counseling example: "Students will be able to demonstrate an understanding of the IGETC transfer option." DSP&S example: "Students will successfully demonstrate self-advocacy skills, when appropriate, with faculty and staff." Student government example: "Students will organize and host a multicultural event that attendees deem relevant to their understanding of other cultural perspectives."

The group called together may be able to generate a lengthy list of outcomes for their unit. If so, they should take time to prioritize the outcomes afterwards. Why? Because it is highly recommended that each function/unit within student services spends their first effort concentrating on their top one or two outcomes. Stick with these top outcomes when planning ways to assess them.

There are at least three "source areas" to keep in mind when developing learning outcomes for student services units: the college's core or general education outcomes (many student service units make important contributions to these outcomes); learning outcomes that are produced exclusively by the unit, and can be thought of as unique to the unit; and learning outcomes prescribed in the accreditation standards II.B.3.b and II.B.3.d.

Student service faculty and staff should try not to fret over writing flawless learning outcome statements. The main thing is to identify and reach agreement on the top priority learning outcomes contributed by their unit. Finally, they should be careful to record and save all meeting minutes including the date, place, time, attendees, and a summary of the results. Minutes will serve as a key piece of documentation for the

institution, and for review by the visiting accreditation team.

6. Develop an assessment plan. The unit staff should meet and brainstorm the types of data that would best measure the unit's contribution to each of their top 1-2 student learning outcomes. While brainstorming, the group should attempt to identify more than one assessment tool or strategy for each learning outcome. Why? Having different measures (i.e., converging evidence) of each learning outcome is necessary to reach a reliable, unbiased, complete picture and reach a meaningful conclusion about what students are really learning. In making the choice of assessment tools, consider the types of evidence that will provide information to make decisions, influence constituents, and be most easily justified. One must also consider that assessment tools vary in terms of cost (although many can be designed in-house), and the logistics to administer them. Finally, carefully consider the extent to which any possible assessment method can realistically be incorporated into your annual responsibilities. Trying to measure too much using a logistically complicated process may very well result in failure.
7. Close the assessment loop with documentation. After collection and review of the assessment data, the unit should prepare a report that discusses the process, the results and suggestions for improving the program and assessment plan, and unexpected outcomes. Individual student data – without reference to specific students, classes, and instructors – may be aggregated for the report and used to consider where students are and are not meeting the intended outcomes. Finally, modify the assessment methods as needed and repeat the process when appropriate.

A word about evidence. While there are literally dozens of measures and assessment strategies available for student service units, evidence of learning falls into two categories, direct and indirect: **Direct methods** of collecting information require students to display their knowledge and skills. **Indirect methods** ask students or someone else to reflect on the student learning rather than to demonstrate it. Other indirect methods involve institutional statistics such as transfer rates or diversity of the student body. Some methods that provide direct evidence include student work samples, portfolios, capstone projects, embedded assessment (where test questions or skill performance assessment of the learning outcome is embedded in regular course exams), observations of student behavior, juried review of student projects, evaluations of performance, externally reviewed internship, performance on a case study/problem, performance on a problem analysis (student explains how he/she solved the problem), national licensure examinations, locally developed tests, standardized tests, pre and post tests, and blindly scored essay tests.

Some methods provide direct evidence including surveys in which respondents (e.g., students, employers, alumni) provide perceptions of learning progress, focus groups, exit interviews with graduates, percentage of students who transfer, retention studies, job placement statistics, percentage of students who study abroad, diversity of the student body, enrollment trends, and academic performance after transfer. Many colleges have been collecting and reporting on indirect types of evidence for years. On the other hand,

good practice dictates that the majority of learning outcome measures should be direct, rather than indirect. When it comes to assessing learning outcomes, direct evidence is more useful and convincing.

Scoring rubrics. Many of the direct evidence assessment methods listed above – observations of student behavior, evaluations of student work samples, portfolios – require a systematic scoring procedure. Rubrics are an especially useful tool for this purpose. A rubric is a set of criteria and a scoring scale that is used to assess and evaluate students’ work. Rubrics help the assessment process in many ways. First, staff must create the rubric; this encourages important thought and dialogue about what constitutes acceptable performance. **A rubric greatly clarifies for evaluators what they should look for as evidence of learning.** When shared with students, the rubric clarifies for students what is expected of them, how they will be assessed, and helps them identify their own learning. Since they are designed “in-house” and belong to the unit, rubrics are free. Finally, a rubric increases agreement across different evaluators; an important property known as cross-rater reliability. Several rubric resource websites have many examples that can be modified according to a college's needs. Those are noted in Appendix A.

Standardized assessment tools. As part of the business of assessment, a number of consultants or groups have formulated standardized assessment tools for use in colleges and universities. Local senates, curriculum committees, and faculty must carefully consider the use--or potential misuse--of these documents, the cost/benefit to students, programs, and institutions. Even more worrisome is the creation of freefloating, externally designed, prefabricated SLOs without specific reference to courses and the particularities of locally constructed course outlines. These standardized SLOs and assessments are not uncommon in some certificate and occupational education programs requiring licensure or board certification; here, student outcomes are generally accepted in the field and industry. Those national or state standards, however, do not absolve faculty from their responsibility to scrutinize these instruments in relation to course and program goals and objectives. Aside from those instances, however, it is abundantly clear that SLO design and implementation or assessment are strictly local faculty matters. On this point, the Academic Senate and the ACCJC are in complete accord. A primary benefit in the design of SLOs is the discussions that result in their adoption. Textbook publishers, testing services, proctors, consultants, and all such entities external to local colleges can only gain entry where local faculty have forsaken their responsibilities in areas related to curriculum and instruction.

Sampling tips. **Assessment can be expensive in terms of instrument purchase and staff time to prepare, administer, and process the assessments.** Strategic sampling, rather than blanket assessment, is an available option. It is also much more efficient, meaningful, and cost effective to restrict sampling to students who have used a unit’s service, rather than using a shotgun approach in which you hope to capture input from at least some students who actually used the unit’s service.

Hard copy and electronic format assessment. Sampling with paper assessment can be made more efficient through the use of scannable answer sheets. Some colleges are

relying on electronic means. Electronic surveys, when appropriate, eliminate a great deal of cost and processing time associated with paper assessment. Electronic portfolios are becoming more popular.

Documentation can provide a way to communicate evidence of the unit's contribution to student learning and compliance with the college's mission. Data also can be used to justify resource requests, to contribute to an institution's self study, and to acknowledge good work by staff. Again, however, while such efforts can realistically demonstrate an effort to maximize compliance with the college's mission, the erratic nature of population changes within community college courses and programs deny the reliability of data that purports to measure Continuous Quality Improvement.

Library Assessment

The accreditation standards call for library and other learning support services at a level "sufficient to support the institution's instructional programs" as well as an assessment of "the student learning outcomes, faculty input, and other appropriate measures." This emphasis, as in the other standards, on measurement of SLOs can be a challenge in a part of the campus which does not traditionally have measurements available from student data such as grades, course completion and graduation rates.

The new standards call for information competency skills as well, a significant departure from the former standards in that it calls for instructional skills usually determined by faculty expertise.

Fortunately, the Academic Senate published *Information Competency: Challenges and Strategies for Development* (2002). This paper was the result of efforts by faculty librarians across the state. Many campuses, as a result, have adopted graduation requirements for information competency or have already integrated features of information competency within other courses. Individual campuses have various models for these graduation requirements. When the campus calls for a single "gatekeeper" course, the student learning objectives for that course can be measured using the techniques outlined under the "Course-Level Assessment" section of this paper.

The Bay Area Community Colleges Information Competency Assessment Project is a collaborative project among faculty librarians in the San Francisco Bay Area; they have developed and field-tested an information competency assessment instrument based on specific performance outcomes – and criterion-referenced to national standards. The project can be applied by librarians in a variety of ways: to their courses, as a challenge to a course, or as part of a broader competency challenge. Though librarians do not teach the institution's range of courses, they are held accountable in the new standards for information competency measures at their local campuses.

Some campuses, notably Merced College, have adopted an integrated, across-the-curriculum model for information competency. This poses new problems to the library faculty in that these competencies must be measured through courses not under the direct authority (if you will) of the library or learning resources faculty. Merced College, as part

of their accreditation self study, has chosen to begin measuring three of the defined information competency skills of the students as they participate in the library orientations for courses which teach information competency skills, using a pre- and post-test to students in those classes.

Institutional effectiveness at the course, program, and throughout the institution is founded largely on local faculty working together and with their classified and administrative colleagues in an effort to create a unified, mission aligned, approach to planning and instruction.

Conclusion

“A degree is not an education, and the confusion on this point is perhaps the gravest weakness in education.”

---Rockefeller Brothers Fund

A consideration of the new standards reveals many challenges and a continuing controversy; but there also exists opportunities for faculty to strengthen their roles in governance. When faculty think beyond their insular responsibility as classroom instructors, they will find in the new standards a model that promotes institutional planning, cooperation, and shared authority that can result in improved service to students. Though the Academic Senate views the idea of SLOs accountability to outside reviewers as impractical, even illogical, the application of outcomes within institutional planning offers potential benefits:

- Mission statements that are composed in precise and deliberate terms and that offer comprehensible and often measurable promises to students provide opportunity for local senates and administrations to share a common focus as they apply measures and outcomes to institutional planning and resource allocation.
- Institutions that link measures, evidence, and planning into a comprehensive system of institutional effectiveness, will, in effect, create an institutional master plan that can serve as a living and responsive document.
- Local faculty and senates must seek active involvement in the new accreditation process. By controlling the development of local outcome measures they should ensure that the focus is on the successful provision of a coherent education – not the mindless accumulation of a series of checked outcome boxes. In this way they can maintain their principled opposition to the new standards while moving their institution forward with the necessary implementation.

Recommendations:

1. Local faculty should be familiar with references that establish the basis for local senate rights and responsibilities in the Education Code and Title 5, understanding that those take precedent over accreditation standards if and when they are

determined by local senates to be in conflict with their academic and professional rights;

2. Local senates should determine the selection of certain key people involved in the self study process, including the self study's Lead Faculty Chair and the Learning Outcomes/Assessment Coordinator (LOAC) who should be compensated with appropriate release, stipends, and/or reassignment considerations (2.02. F03);
3. Local senates should engage the entire college community in the holistic exploration of appropriate and reasonable criteria for the implementation of SLOs for library and student support services units;
4. Local senates are encouraged to adopt a statement of philosophy about the nature and use of assessment mechanisms and SLOs prior to their being implemented;
5. Local senates are urged to work with local bargaining units to resist efforts to link evaluation of faculty to the accreditation process itself and to reject recommendations that suggest a college must accede to such demands.
6. Local senates are strongly advised to employ methodologies that create a blind between individual class sections and the institution to protect the privacy of students and faculty (2.01 F03).
7. Local senates are urged to take measures to safeguard the academic freedom of untenured and adjunct faculty, including adopting statements on academic freedom and privacy such as those adopted by the Academic Senate and the American Association of University Professors (AAUP) (2.01 F03);
8. Local senates are advised to establish processes, timelines and guidelines for creating, identifying and assessing SLOs in all matters related to accreditation and ongoing planning, including curriculum, program review – and in close cooperation with all student service related programs (2.01 S04; refer also to Appendix D).
9. Local senates are urged to not accept for adoption externally designed, prefabricated SLOs except as required by those certificate and occupational education programs requiring licensure or board certification – and to recognize that even with such national and state standards, local faculty retain responsibility to scrutinize such instruments in relation to course and program goals and objectives (2.01 F04).
10. Local senates and curriculum committees are strongly advised to use “objectives” in Course Outlines of Record as opposed to “Student Learning Outcomes.” Until definitions of assessment terminology have been standardized within the system and among intersegmental groups, the term “Student Learning Outcomes” is suggestive of assessment choices that are rightfully a matter of course level determination by the instructors of record (2.05 F04).