

A Critique of ACCJC's 2014 Standards with Respect to Educational Quality and Excellence

INTRODUCTION

This paper addresses two questions. 1) Do the 2014 ACCJC standards enable colleges to evaluate themselves with regard to their academic or educational quality and excellence? 2) Do the standards enable ACCJC to evaluate colleges with regard to their academic or educational quality and excellence? These questions are closely-related, and what I say below answers both in the negative.

MAIN SECTION

A major indicator that the answers to the two questions are negative is ACCJC's statement in its "Introduction": **"The effective institution ensures academic quality and continuous improvement through ongoing assessment of learning and achievement"**. This supposes that assessment of learning and achievement reveals whether or not one's academic programs and courses are of high or at least acceptable academic quality. The slightest thought, however, reveals that there is no necessary connection between the two. Indeed, a little further thought reveals that one might well find an inverse relationship between high or acceptable academic quality and student learning and achievement. In other words, one might find that the higher the academic quality of one's programs and courses, the lower the learning and achievement of students, when measured appropriately. One might also find that, properly measuring learning and achievement, a student who scored below a "C" in a course of high academic quality actually learned more than a student who scored a "C" or better in a course of low academic quality.

It is also true, of course, that there is no necessary connection between student learning and achievement and the quality of the faculty and their teaching. Faculty may be of excellent quality and be excellent teachers on all measures of excellence save the learning and achievement of students, and yet the learning and achievement of students be low. Faculty surveys and student surveys at Fresno City

College (FCC) reveal that most students who don't succeed in their courses don't succeed because they don't attend regularly, don't turn in assigned work, or don't seek readily-available assistance whether from faculty or student services. Students taking the best courses from the best teachers in the world will have low outcomes on learning and achievement if they don't attend the courses or don't turn in the required work or don't seek readily-available assistance when they need it.

The last sentence of the preceding paragraph needs emphasizing, for it appears to be a recurring assumption in ACCJC's standards and thinking, and indeed of much thinking that I've encountered in the many conferences I've attended over the years, that the educational institutions they evaluate are responsible for student success. In fact, students are responsible for their success or their lack of success, leaving various contingencies and vicissitudes of life outside the control of the institutions or the faculty to the side. Faculty and the institutions that employ them are responsible for making any success students have actually meaningful through challenging, high quality academic programs that prepare them well for their future after they complete their goals at the institution. They are also responsible for making available appropriate assistance to students who seek it, but the idea that they are responsible for students' success, and should have their accreditation stripped or downgraded because they have low grades on their "student success scorecard", is at best an unsupported assumption and at worst simply false. In the best case, it tends to undermine an institution's and a faculty's attempts to maintain or to improve the academic quality of its courses and programs, and increases the temptation to lower the academic quality of its courses and programs in order to look good to the accrediting agency and acquire the coveted "accreditation reaffirmed" status.

The "Introduction" follows the statement quoted above with this one: **"...and pursues institutional excellence and improvement through ongoing, integrated planning and evaluation"**. I take it that "institutional excellence" here means either excellence in student learning and achievement or excellence in academic quality, or both. On either meaning, it is not made clear how "integrated planning" and evaluation, whatever exactly "integrated planning" means, is a means to pursue excellence in student learning or in academic quality. There is no obvious connection between "integrated planning"

and academic quality: one could clearly have the one without the other. Is there nevertheless a non-obvious connection between student learning and achievement and “integrated planning”?

Here is an argument that there is not. Since I came to FCC in 1999, the Philosophy Program has assessed the learning and achievement of students who take courses in the program or who are majors. It did this long before SLOs, PSLOs, or ISLOs were invented and forced on colleges by the accrediting commission, and it has continued to do it to this day. It has used its assessments to evaluate its courses and to try to improve the courses and student success in them. It has not engaged in anything that is or appears to be “integrated planning”. I take it that all, or almost all, programs in all the other divisions and departments of FCC have done the same thing that the Philosophy Program has done. So, the learning and achievements of students are assessed and evaluated in all the programs at FCC, these assessments and evaluations are sent to Institutional Research, and it assembles and organizes them into the appropriate reports to be sent to the State Chancellor’s Office, the President of the College, etc. None of this calls for “integrated planning”, except in so far as deadlines and formats, etc. necessitate such planning. There is one caveat here: I do not claim to understand what ACCJC means by “integrated planning and evaluation”. I do not see it defined in the standards. It appears to be a vacuous phrase, a vacuous phrase that is typically read in such a way as to impose enormous burdens on community college administrators, faculty, and classified professionals, and financial costs on the institution.

In the second paragraph of its “Introduction”, first sentence, ACCJC says there are **“four Standards that work together to define and promote student success, academic quality, institutional integrity, and excellence”**. This is a mysterious sentence. Four Standards “work together” to define and promote student success, academic quality, etc? What does that even mean? To define student success, one need make no reference whatever to the other three. Indeed, the State Chancellor’s office defines it in terms of a “C” or better in a graded course or a “pass” in an ungraded course. Notice that it doesn’t define it in terms of SLOs or PSLOs or the like, but in terms of a letter grade for the course. This makes good sense, because a grade for a course is a much better measurement of student learning than anything ACCJC has suggested. Grades are a distillation of several assessments of all different kinds over the

course of the entire term, while measurement of SLOs is, at best, a snapshot assessment of one skill or expected outcome at one time.

The same point made about defining student success applies equally to defining “academic quality”, etc. One need make no reference to any of the others to define any one of them. Beyond this, what does “institutional integrity” or “excellence” mean when they are not simply describing student achievement or the level of student success? An excellent academic, educational institution is nothing beyond an institution that does an excellent job of creating a high quality academic curriculum, teaching the courses in the curriculum well, and offering students high quality, readily-available assistance to succeed in their courses and in their educational goals.

There are other mysterious sentences in the second paragraph. Sentence three reads: **“The institution provides the means for students to learn and achieve their goals, assesses how well learning is occurring, and strives to improve learning and achievement through ongoing, systematic, and integrated evaluation and planning”**. The same question arises here as arose above: what’s the connection with this “integrated planning” and student learning and achievement?

Sentence four is absurd as well as mysterious. It says this: **“Student learning programs and support services make possible the academic quality that supports student success”**. It is absurd because student support services obviously do not make possible academic quality, and academic quality obviously does not support student success. Indeed, as noted above, it might be an obstacle to student success. Student learning programs, meaning, I suppose, the various academic and technical programs that the several divisions provide, don’t make possible academic quality; they are either of high quality or they aren’t. The question of what makes them high quality is not even touched here. Courses or programs of study that are of high or excellent quality are made possible by excellent faculty who design and teach them, period. Unless ACCJC’s standards enable evaluation of the faculty and the courses and programs they teach, they do not get at the academic quality of the institution. I assert here, and will defend the assertion later, that nothing in the ACCJC standards enables the evaluation of the faculty or of the academic quality of the courses and programs they design and teach.

The last sentence of paragraph two of the “Introduction” asserts that **“integrating the elements of the Standards gives institutions the means to develop a comprehensive assessment of academic quality, institutional integrity and effectiveness, and a path to continuous improvement”**. Not only is this mere assertion that comes out of nowhere; it also faces the same criticism as before: there is no clear connection between academic quality and “institutional integrity and effectiveness”; just as there is no connection between academic quality and student success and achievement.

Standard I.B.1 speaks of demonstrating **“a sustained, substantive dialog about student outcomes, student equity, academic quality, institutional effectiveness, and continuous improvement of student learning and achievement”**. How does ACCJC understand academic quality? Where would it look to find this dialog? Program Review (PR)? Curriculum Review (CR)? Neither get into academic quality, properly so called, because neither provide analysis of the contents of courses, the rigor and breadth of the courses, etc. This can only be done by discipline faculty who understand the subject matter and know how to teach it well and who are therefore qualified to evaluate the academic quality of the courses and the program. It is true, of course, that PR and CR provide some check on the academic quality of courses and programs, and ACCJC should look closely at an institution’s processes for Program and Curriculum Review and the documentation of its deliberations and decisions. It should also assign specific members of its teams, preferably faculty with experience of both PR and CR, to meet with members of the committees to get insight into the quality of the committees, but this is not sufficient and is in any case not something highlighted and emphasized by the ACCJC standards.

There are at least two ways one could measure academic quality. One could assess how well a college prepares its students for their subsequent career at a transfer institution of good or high academic quality or for a job. ACCJC doesn't do that, for there are no data for most programs. Even if there were data, and ACCJC studied the data, the data would not get at the quality of the feeder institution because there are too many variables that the data would not and could not catch.

As just one example, suppose one looked at all the students who took at least one of my philosophy courses at FCC and tracked each one who transferred to a four-year institution. Suppose all

did quite well in their philosophy courses or in their courses in general, and that students who did not take any philosophy courses from me who went on to the same four-year institutions didn't do nearly as well. Could one properly infer that it was my philosophy courses that made the difference to the success of the one cohort of students compared to the success of the other cohort? No, because of all the factors that could as well explain the differences as having taken my philosophy courses. This way of attempting to measure the academic quality of feeder institutions seems like a non-starter, but perhaps there are ways of setting up the studies that would surmount all the problems. In any case, I am aware of no attempts on the part of ACCJC to set up such studies or to evaluate their results.

Another way to measure academic quality is for qualified faculty to assess the academic quality of courses and programs. Can ACCJC assess whether the faculty at an institution it is evaluating are qualified? Perhaps it could do so if it had a lot more highly-qualified faculty on its accreditation teams than it typically does, and if it assigned those faculty the specific task of evaluating the quality of faculty at the campus being evaluated. As things stand now, however, after a careful reading and analysis of the current standards, this is not an emphasis or even an expected area of review.

There may be other ways to assess the academic quality of courses and programs, and it may be that ACCJC uses one of those ways on a regular basis, but it is not clear that there are, and far from clear that ACCJC has or uses any effective way of evaluating the quality of the faculty at the institutions it is evaluating.

Standard I.B.7 states **“The institution regularly evaluates its policies and practices across all areas of the institution, including instructional programs, student and learning support services, resource management, and governance processes to assure their effectiveness in supporting academic quality and accomplishment of mission.**

This is another sentence that contains an absurdity. Instructional programs don't "support" academic quality. They are either of good or high academic quality or they aren't. The question is how the institution ensures its programs are of high academic quality and how ACCJC can possibly monitor this?

Standard I.C. 3: **“The institution uses documented assessment of student learning and evaluation of student achievement to communicate matters of academic quality to appropriate constituencies, including current and prospective students and the public.**

Notice the terrible confusion here between student achievement and academic quality. You will have noticed that this is a recurring theme in the standards: assessment of student learning and achievement, presumably through assessment of SLOs, PSLOs, etc. is assumed to be a measure of academic quality. Since it seems clear that this confused thinking is ACCJC’s thinking, it is logical that it would say little to nothing about actually assessing academic quality or that it would have an effective means of monitoring any process in place for assessing the academic quality of the faculty or of the courses they teach. Communicating such confused measures of quality to the public, as this standard directs, would only compound the problem. It would encourage a competition among colleges that would be detrimental to the actual quality of education in the Community College system.

II.A.2 reads in part: **“Faculty, including full time, part time, and adjunct faculty, ensure that the content and methods of instruction meet generally accepted academic and professional standards and expectations”.**

How does ACCJC ensure that they ensure this? The only way that I see that FCC does this is through our evaluation process for instructors, but is this evaluation process good? How do we know? More importantly, how does ACCJC know?

One way it could possibly know, or at least get some insight, is to examine the faculty evaluation process in place and to talk to a representative sample of those in charge of the evaluation process and those who have been evaluated through the process. These processes are typically spelled out in collective bargaining agreements. This does not appear to be an emphasis of ACCJC, and it is certainly not spelled out in its standards that it will take a close look at institutions’ processes for faculty evaluation to ensure, in so far as possible, that they are effectively doing what they are supposed to do. Speaking from personal experience on an accreditation team, I can say that I was the only person on the ten-member team, dominated in any case by non-faculty members, that insisted on looking at the collective

bargaining agreement on the evaluation of faculty, talking with union representatives about the process, and talking with faculty who had been evaluated in accordance with the process. The rest of the members of the team were not interested in doing this, and it was clear that they saw themselves under no obligation to do it as part of an ACCJC accreditation visiting team.

Another way it might possibly get some insight is to require that each member of the visiting teams visit a certain number of classes as part of their evaluation of the quality of instruction. A ten-member visiting team could easily visit and evaluate at least 50 courses during its visitation, thereby acquiring a reasonably good impression of the quality of the courses and the instruction. Of course, this would mean, among other things, picking team members who are known to be qualified to evaluate the quality of courses and instruction, but this should not be beyond the abilities of competent accrediting bodies and, indeed, should be an essential element of what they do. Again, my experience as a member of an ACCJC visiting team was that I was the only member of the team who visited and evaluated courses and the quality of instruction, and that no other team member evinced the slightest interest in doing so. This is almost certainly because ACCJC's standards do not require team members to do this, and do not encourage them to do it.

II. A. 5.: “The institution’s degrees and programs follow practices common to American higher education, including appropriate length, breadth, depth, rigor, course sequencing, time to completion, and synthesis of learning”.

The only persons competent to judge this are qualified faculty. How does ACCJC determine that faculty are qualified? I have addressed this issue above. More important here is the question of how the ACCJC determines that in so far as faculty evaluate the breadth, depth, and rigor of degrees and programs, they do so in an objective, fair, and sufficiently-informed way? This is a critical issue. Departments can become lazy; faculty can fail through indolence or disinterest to maintain rigorous courses; indeed, faculty can feel that they shouldn't maintain rigorous courses because they're penalized for it when the data show that their students fail to succeed at the expected or mandated rates. I venture

that in so far as any college degree or education is “worthless” it’s because its courses were not of sufficient breadth, depth, and rigor.

III. A. 1.: “The institution assures the integrity and quality of its programs and services by employing administrators, faculty and staff who are qualified by appropriate education, training, and experience to provide and support these programs and services”.

How does ACCJC monitor this? Does it look at the qualifications of all the administrators, faculty, and staff? Impossible, so does it look at a representative sample? Who is qualified on accreditation teams to render judgments on the qualifications of the employees and on their training and experience? Many of my comments above are pertinent to these questions.

It would be tedious to continue to go standard by standard, as I have done, but I should say that with respect to III.A.2 that speaks of faculty qualifications, standard III. A.3 that speaks of employees responsible for educational programs possessing qualifications necessary to sustain academic quality, and standard III. A. 7 that speaks of a sufficient number of qualified faculty to assure the quality of educational programs, all are subject to criticisms previously made with respect to other standards and all provoke the same question I’ve raised numerous times before, viz. How does ACCJC monitor this?

CONCLUSION

ACCJC’s standards do not enable colleges to evaluate themselves with regard to their academic or educational quality and excellence; they do not enable colleges to evaluate the academic quality of their faculty; and they do not enable ACCJC to evaluate colleges with regard to their academic or educational quality and excellence. If these conclusions are right, then they constitute a serious, indeed, a damning critique of ACCJC’s standards. If they’re right, they also call for serious study of the issues of the academic quality of institutions and of faculty and administrators and how to appropriately assess and evaluate them.