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*Chair of the Assembly of the Academic Senate
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March 5, 2014

MARY ELLEN PETRISKO, PRESIDENT
SENIOR COLLEGE COMMISSION
WESTERN ASSOCIATION OF SCHOOLS & COLLEGES

Re: The Role of WASC at UC Irvine

Dear Ms. Petrisko:

The University Committee on Educational Policy (UCEP) of the Academic Senate of the University of California has asked me to forward you the attached statement from the UC Irvine Committee on Educational Policy expressing concerns about new mandated measures in the WASC accreditation process. This statement was endorsed by UCEP and discussed by the UC systemwide Academic Council at its February 26, 2014 meeting.

The letter notes that some of the new reporting requirements are redundant with the information the university already provides through existing mechanisms. These new requirements represent an unfunded mandate to prepare reports in new formats in what appears to be a desire to standardize presentation across a wide variety of institutions, despite the likelihood that reporting in a manner that is consistent with the institutional mission will be more effective. This “one size fits all approach” to reporting is particularly onerous in lean budget times when institutions have reduced staffing in functions that could do the mandated work. Moreover, changes in format make it more difficult for institutions to use longitudinal data to track and report their performance over time. I ask that you review the comments in the Irvine letter carefully and consider how you can use the in-depth reports that our campuses already prepare to convey the information you seek.

While these concerns are being articulated by UC Irvine, they are shared by faculty on all UC campuses. They also call to mind UCEP’s extensive work on accreditation issues over the past three years in response to WASC’s Handbook redesign. In 2012, that committee produced two documents for WASC’s consideration that are relevant to this conversation. One is a White Paper on Peer Review as a Tool for External Validation¹, which provides the analytical foundation for grounding accountability benchmarking in peer review rather than standardized metrics. The other is a detailed Proposal² for adapting UC’s existing program review process to meet the needs of accreditation review. The Academic Council encourages WASC to consider these approaches as it moves forward with its accreditation redesign.

¹ http://senate.universityofcalifornia.edu/reports/UCEP_WASC_WhitePaperFINAL010912.pdf

² http://senate.universityofcalifornia.edu/reports/UCEP_WASC_proposal-FINAL010612_withAppendices.pdf

The Academic Senate appreciates WASC's work and willingness to engage the UC faculty on these and other issues. Please do not hesitate to contact me if you have further questions.

Sincerely,

A handwritten signature in black ink that reads "Bill Jacob". The signature is written in a cursive, slightly slanted style.

Bill Jacob

Encl (1)

Cc: Academic Council
Provost Dorr
Assistant Director Baxter
Senate Executive Directors
Senate Committee Analysts



UNIVERSITY COMMITTEE ON EDUCATIONAL POLICY (UCEP)
Tim Labor, Chair
tim.labor@ucr.edu

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February 11, 2014

William Jacob, CHAIR
ACADEMIC COUNCIL

RE: THE ROLE OF WASC AT UC IRVINE

Dear Bill,

UCEP has discussed the attached memo from the Irvine division's Assessment Committee expressing a number of concerns about the role of WASC. UCEP members agreed to submit this memo to Council with a recommendation that it be forwarded to WASC.

Sincerely,

A handwritten signature in blue ink, appearing to be "TL".

Tim Labor, Chair
UCEP

UNIVERSITY OF CALIFORNIA, IRVINE
COUNCIL ON EDUCATIONAL POLICY

December 20, 2013

TIMOTHY LABOR
CHAIR, UNIVERSITY COUNCIL ON EDUCATIONAL POLICY

Re: THE ROLE OF WASC AT UC IRVINE

The University of California, Irvine, Council on Educational Policy (CEP) has learned through its subcommittee, the Assessment Committee (AC), that the Western Association of Schools and Colleges (WASC) will be implementing a new round of assessment requirements for institutions of higher education (see Appendix A of this memo).

UC Irvine CEP is concerned that WASC is overreaching its authority by imposing a new set of standards and measures of student success that are unlikely to result in improved student learning and will demand significant unfunded resources. UC Irvine has been informed that WASC will compel institutions to implement four changes as part of its redesign of the accreditation process. The description below each change is the AC's recommended response to the change:

Change 1: Institutions to complete retention and graduation data templates for undergraduate and graduate students.

The Assessment Committee emphasizes that because this is not an area of concern for UCI as UCI's retention and graduate rates are excellent by all institutional standards, UCI should not be required to provide extra data on graduation and retention rates. We understand that UCI is currently seeking input from both WASC and UCOP about whether the data that our institutional research office already reports on a regular basis would be sufficient to meet this requirement. If it is not, and the requirement persists, the Office of Institutional Research would most likely be charged with processing the data templates, a task that would take months to complete every three years, and which would duplicate work already done on campus to monitor retention rates. Another UCI unit, yet to be identified, would be charged with writing the narrative report required to accompany the completed data templates. Both tasks would require additional funds.

Change 2: Institutions to increase emphasis on how institutions contribute to the public good.

The Assessment Committee recommends no additional action on the part of UCI to conform to Change 2. The Assessment Committee notes that UCI already routinely provides this information to the community.

Change 3: Institutions to complete descriptions of degrees, with increased emphasis on the meaning of the degree as a whole.

WASC states that institutions are now expected to define the meaning of the undergraduate and graduate degrees they confer to ensure their quality and integrity.

The Assessment Committee recommends that CEP and UCEP reject this requirement in its present form. The requirement could lead to new degree standards that judge a degree's value based on specific quality as yet to be defined by WASC. This requirement could also eventually

UNIVERSITY OF CALIFORNIA, IRVINE
COUNCIL ON EDUCATIONAL POLICY

force institutions to design and manage degrees for the sole purpose of satisfying specific vocational needs in society rather than addressing the intellectual mission of institutions like UCI.

Change 4: Institutions to demonstrate achievement of core competencies.

WASC states that baccalaureate programs must “ensure the development of core competencies including but not limited to five core competencies, *written and oral communication, quantitative reasoning, information literacy and critical thinking.*” WASC is asking institutions to describe how the curriculum addresses each of the five core competencies.

The Assessment Committee recommends that CEP and UCEP reject this requirement as stated and request WASC to work with each campus to identify core competencies appropriate for that campus. Three of these competencies (writing, quantitative reasoning, and critical thinking) are already addressed in General Education Courses. Providing additional evidence of these three core competencies aside from satisfactory completion of GE courses is not necessary for UCI to ensure that students have demonstrated knowledge of these competencies. The two added core competencies, oral communication and information literacy, are also already folded into existing curriculum requirements for many majors. And assessing oral communication skills for all students would be an overwhelming task at any large institution.

Since its inception, the Assessment Committee has supported WASC measures including the current assessment and evaluations mandates. AC also believes that WASC has done an excellent job of ensuring that quality education standards are being met at UCI. The committee believes that the added WASC mandates are a one size fits all solution that were probably intended for for-profit institutions whose academic circumstances differ from those of the University of California. With the introduction of new types of educational institutions constructed on entirely different pedagogical and financial models, perhaps it is time for WASC to differentiate its requirements for different types of institutions.

CEP kindly requests that you share these responses with the members of UCEP. We also hope that UCEP will forward our recommendations to the University of California, Academic Senate.

Sincerely,



Tony Smith, Chair,

Committee on Educational Policy
University of California, Irvine

- C. William Jacob, Chair, University of California, Academic Senate
Mary Gilly, Chair-Elect, University of California, Academic Senate
Peter Krapp, University of California, Irvine, Academic Senate Chair
Fillmore Freeman, Chair, University of California, Irvine, Assessment Committee
Venette van Duyn, Assessment Coordinator, UC Irvine

APPENDIX A

WASC 2013 Handbook of Accreditation
WASC Academic Resource Conference, April 10-12, 2013
Venette Van Duyn, Ph.D., Assessment Coordinator,
UC, Irvine

Change #1 – Institutions to complete retention and graduation data templates for undergraduate and graduate students.

Description of Change: WASC's new guidelines were developed to present indicators of student success in a common, consistent format for the WASC Retention and Graduation Rate Committee. Each institution must complete the data templates, identify peer institutions for comparisons, and develop a narrative describing the data. This report will be examined by a review panel to identify whether rates and time to degree are appropriate, both overall and by subpopulation, and to set forth recommendations for further action as needed. Institutions will be expected to submit this information every three years.

For further information, see here: <http://www.wascsenior.org/redesign/retentionandgraduation>

Implications for UCI: Office of Institutional Research will likely have to take responsibility for completing the data templates. This will require several months of work every 3 years. In addition, UCI should identify a group to provide feedback on the narrative report, to assist with providing a context for the results.

Change #2 – WASC has increased emphasis on how institutions contribute to the public good.

Description of Change: As part of the redesign of the accreditation process, WASC received feedback from institutions in the region that an institution's contribution to the public good should be reviewed through the accreditation process. WASC decided to include reference to the public good in the revised Standards of Accreditation (specifically, CFRs 1.1 and 2.2 a).

For further information, see here: <http://www.wascsenior.org/redesign/draft-public-good>

Implications for UCI: Our next self-study will have to include a section describing how we contribute to the public good. Suggestions for this portion of the self-study include describing data we pull regularly on the performance of underrepresented students, describing UCI's engagement with the community, UCI's celebrations and traditions, an overview of the medical center and general advances in producing new technology, and a description of academic programs with a service learning component.

Change #3 – WASC has increased emphasis on the meaning of the degree as a whole

Description of Change: Institutions are expected to define the meaning of the undergraduate and graduate degrees they confer and to ensure their quality and integrity.

For further information, see page 27 of the revised Handbook of Accreditation:

<http://wascsenior.org/files/penultimatedrafthandbook v2.1.pdf>

And the Lumina Foundation’s Degree Qualification Profile, which is being piloted as a framework for evaluating the meaning and quality of degrees:

http://www.luminafoundation.org/publications/The_Degree_Qualifications_Profile.pdf

Implications for UCI: Consider implementing institutional learning outcomes. In our next self-study, we will need to describe the skills that all UCI students can demonstrate by the time they graduate (i.e. describe what is distinctive about our institution’s graduates).

Change #4 – WASC expects institutions to demonstrate achievement of core competencies

Description of Change: In the 2013 Handbook, CFR 2.2a states that baccalaureate programs must: “ensure the development of core competencies including, but not limited to, **written and oral communication, quantitative reasoning, information literacy, and critical thinking.**” The institutional review process calls upon institutions to describe how the curriculum addresses each of the five core competencies, explain their learning outcomes in relation to those core competencies, and demonstrate, through evidence of student performance, the extent to which those outcomes are achieved.

For further information, see page 28 of the revised Handbook of Accreditation:

<http://wascsenior.org/files/penultimatedrafthandbookv2.1.pdf>

Implications for UCI: Existing learning outcomes (particularly GE outcomes) need to be mapped to the 5 core competencies. This will require an extensive revision to the learning outcomes assessment methods set forth by Senate Assessment Committee.