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August 15, 2012

RALPH WOLFF, PRESIDENT, SENIOR COLLEGE COMMISSION  
WESTERN ASSOCIATION OF SCHOOLS & COLLEGES

**Re: UC Davis Reaccreditation Review template - graduate data**

Dear Ralph:

At its July 25, 2012, meeting Academic Council discussed WASC's inclusion, in its template for the Davis campus' reaccreditation review, of the draft proposal to collect data regarding graduate programs of all types, including Masters programs, professional programs including professional doctorates, and academic doctoral programs, now under review in the region. WASC's demand for information based on an unadopted draft policy has placed us in an impossible time bind. We would like to work with WASC to develop an ongoing policy, and we are open to considering WASC's arguments in that process, but we strongly believe that this unadopted policy cannot be applied to UC Davis.

There are three primary areas of concern: procedural, including the implementation of draft regulations and the lack of consultation; the content and the content design process; and, finally, the lack of any need for the collection of such data by WASC given the University of California's rigorous program approval and review processes and the similarly rigorous reviews conducted by accreditation organizations for specific professional degrees.

First, the data regarding graduate programs that UC Davis has been told to provide are not part of official review requirements adopted by WASC. Related to this, a very short timeline was set for UC Davis to provide the data: the instructions were received at the end of June and the deadlines for content are September 1 through November 1.<sup>1</sup> The information requested requires detailed analysis of graduate program goals and outcomes that will need to come from the faculty of those programs. This is particularly difficult timing as the campus is not in regular session until late September and many faculty members are not available until then. Additionally, the campus is expected to provide these data prior to any revision and possible formal approval of the proposed regulations. Effectively, this UC campus has been forced into a non-voluntary pilot program. There is concern that the WASC review of the campus will be prejudiced if the data aren't provided. In other words, the statement that supplying the data is voluntary does not mitigate the inappropriateness of the request. WASC requirements appear to be a moving target, which is challenging for any campus to

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<sup>1</sup> WASC Accreditation Redesign: Pilot Institutions. Webinar. June 27, 2012.

meet. The challenge of meeting a moving target is exacerbated by such short turnaround times that detract from the ability to provide the required information on undergraduate programs for the WASC review. The Academic Council expects WASC to withdraw officially its current data request regarding graduate education to UC Davis, and *to commit to not imposing any requirements not included in official WASC review requirements at the time a review is initiated* not only for the review in question but for all future reviews.

The second concern is that the data requirements listed in the draft regulations do not provide useful measures of graduate program quality and success. The draft items are summary data requirements that ignore the fact that aggregated measures such as time to degree are less useful at the graduate level than at the undergraduate level, given differences across disciplines and even across degree programs within a given discipline with different emphases. Similarly, using aggregated time to degree measures is problematic because the primary goal for these degrees is producing students with a specific high-level skill set. Even within an individual graduate program, students enter with differing backgrounds and therefore progress at differing rates toward meeting the requirements for the degree. There is intensive student-specific mentoring by faculty members. Some activities that will enhance student success are established by the career goals of the individual student. For example students seeking a teaching position may be advised to become a teaching assistant and develop a portfolio of teaching experience while those seeking a career in industry may be advised to engage in internships to gain valuable experience; in big-science areas, the time to graduation is subject to the schedules of the experiments, which are completely outside the control of the student, the advisor, the department and the campus. The individualized nature of the program and success of each student in attaining goals is more important than the time line for graduation. Thus, the statistics require exhaustive explanations. Recognizing this, the draft data requirements provide space to explain the realized value of each summary measure. Explaining an aggregated measure such as time to degree across a campus or within a broad set of disciplines is likely to require responses disaggregated to the program level paired with information on enrollments across programs. This will enormously complicate the report because mature UC campuses each have dozens of academic and professional programs; and, even if provided, the data do not constitute a measure of the quality and effectiveness of the program. *Effectively, the draft requirements would increase the workload enormously because of the campus' commitment to excellence in a broad range of graduate programs and multiple degree titles, while the summary measures themselves do not provide useful information on the value and quality of these programs.*

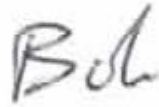
Third, UC has its own extensive graduate program review process. In addition to the elements of the comprehensive, rigorous program reviews conducted at the undergraduate level provided to WASC, respected leaders within each discipline are brought to each campus as outside reviewers of individual doctoral programs. Professional programs undergo their own professional accreditation program reviews administered by experts in the profession in question. UC's rigorous processes of program review and proposed new graduate programs is more substantive than the quantitative summary measures proposed in the draft regulations, and focuses on the specific criteria for success in each program and the progress and success of each student enrolled. *Professional accreditation and UC's program review processes are rigorous means of ensuring program quality that a regional accreditation organization does not have the resources or expertise to replicate.*

The Academic Council's understanding of the motivation behind the draft regulations is to enable WASC to identify which institutions are not meeting their commitments to their students and the Department of Education. The Academic Council suggests that WASC consider developing a screening mechanism utilizing the data institutions already provide directly to the Department of

Education as a means of identifying institutions requiring further investigation. If some institutions do not provide that information to the federal government directly, WASC could simply require those institutions to provide the same data. This approach would mitigate the administrative burden on all institutions that provide high-quality graduate education, not just UC.

The Academic Senate is more than willing to discuss program evaluations with WASC. Engaging in dialogue would provide a more complete and accurate understanding of the graduate programs and review process at the University of California. An improved understanding of graduate education at a research university would enhance WASC's ability to advocate for graduate education in the state, region, and U.S.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob", is centered on the page.

Robert M. Anderson

Cc: Provost Dorr  
Academic Council  
Associate Director Baxter  
Executive Director Winnacker  
Executive Director Anderson, UC Davis