UNIVERSITY OF CALIFORNIA, ACADEMIC SENATE

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

Robert M. Anderson
Telephone: (510) 987-9303
Fax: (510) 763-0309
Email: *Robert.Anderson@ucop.edu*

Chair of the Assembly and the Academic Council
Faculty Representative to the Board of Regents
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

January 12, 2012

RALPH WOLFF, PRESIDENT
WASC SENIOR COLLEGE COMMISSION

Via email: RWolff@wascsenior.org

Re: UC Academic Senate proposals for program review and external validation

Dear Ralph:

I write to transmit the University of California Academic Senate's comments on the resolution on Graduation Proficiencies for Undergraduate Courses considered by the Commission at its meeting on November 3. As you know, our University Committee on Educational Policy (UCEP) has done extensive work on this issue in consultation with the Coordinating Committee on Graduate Affairs (CCGA) and the Academic Council. CCGA and Council have endorsed UCEP's work and its call for reliance on peer review as the primary tool for validating the quality of undergraduate programs and courses.

UCEP has produced two important documents for WASC's consideration. One is a White Paper on peer review as a tool for external validation, which provides the analytical foundation for the proposal to focus on peer review rather than standardized metrics to validate program goals and learning outcomes. The other is a practical proposal for adapting the program review process UC has already developed to meet the needs of accreditation review.

In addition to the two documents, I also enclose a letter to me from UCEP Chair Jose Wudka reporting on his committee's meeting with you and explaining its reasoning in preparing the materials. A second letter from CCGA chair Rachael Goodhue conveys her committee's endorsement of UCEP's work and a series of written questions to you in response to your offer to CCGA to answer such questions. At its December 14 meeting, the Academic Council unanimously endorsed UCEP's and CCGA's position. Council urges WASC to use the UCEP analysis and

proposal as the basis for designing its program reviews at research universities and to consider how they might be adapted for other four-year institutions.

Sincerely,

Robert M. Anderson

Cc: President Yudof
          Provost Pitts
          Academic Council
          Jessica Worchel, WASC
          Executive Director Winnacker

Encl.

BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERCED • RIVERSIDE • SAN DIEGO • SAN FRANCISCO   SANTA BARBARA • SANTA CRUZ

UNIVERSITY COMMITTEE ON EDUCATIONAL POLICY (UCEP)   Assembly of the Academic Senate
Jose Wudka, Chair   1111 Franklin Street, 12th Floor
Jose.wudka@UCR.EDU   Oakland, CA 94607-5200
                                                          Phone: (510) 987-9466
                                                          Fax: (510) 763-0309

January 6, 2012

Robert Anderson

Re: WASC Meeting with the University Committee on Educational Policy

Dear Bob,

The University Committee on Educational Policy met with Ralph Wolff, President of the Senior College Commission of the Western Association of Schools and Colleges (WASC) on November 7, 2011. In this letter, I convey the thoughts of UCEP as regards that meeting and recent actions taken by WASC. At the outset, UCEP was very appreciative of Wolff's taking the time to meet with UCEP.

At its meeting on November 3, 2011 Accrediting Commission for Senior Colleges and Universities took several actions that will directly affect the University of California specifically and higher education in the region covered by WASC generally. Several of these have a positive effect. First, the Commission streamlined the accreditation process and began planning to clarify the language of the Handbook of Accreditation. To develop a simple and clear process in a complex political and educational environment, we recognize, is no easy task. On the one hand, WASC is an association of the schools that constitute it, and "Its purpose is to promote the welfare, interests, and development of . . . higher education" particularly by facilitating the "improvement of educational programs."[1]   On the other, WASC is a regulatory agency authorized by the U.S. Department of Education to help ensure that Federal dollars allocated to higher education are wisely and effectively spent. WASC therefore must both help institutions to improve and judge their worthiness. The conflict between these two purposes is analogous to the conflict we experience in educating students. On the one hand, we coach, guide and mentor our students to learn; on the other we judge them when we grade them, saying how worthy their performances are and what their performances entitle them to do next. Thus, we do appreciate how complex is the Commission's task in developing an accreditation process that serves multiple ends for multiple constituencies.

Second, UCEP applauds the Commission's decision to publish electronically the team reports and Commission action letters for all institutions that WASC accredits. Given the work that goes into these reports and given the wealth of data on which they are based, they provide information fundamental to accountability. Furthermore, given that public institutions are required by law to publish their accreditation materials, this new mandate levels the playing field if all WASC-accredited institutions must be equally transparent in their interactions with the Commission.

---

[1]Article I, Western Association of Schools and Colleges Constitution, As Amended, September 2, 2009 (pdf file accessed from "Constitution" link, http://www.wascsenior.org/about, November 18, 2011).

Third, UCEP applauds the Commission's effort to investigate how accreditation should best address the proliferation of for-profit institutions. In our consideration of proposed changes to the Handbook, we wondered if the poor performance of many proprietary institutions has been driving the proposed changes in the evaluation of CFR 2.2. If so, then it is probably not appropriate to evaluate for-profit and not-for-profit institutions by the same process. Thus, we are pleased to learn that the Commission will consider that institutions with such fundamentally different educational financing models might best be served by fundamentally different approaches to accreditation.

Fourth, UCEP is relieved that the Commission continues to consider and seeks counsel how best to validate student learning. Education reforms, as we know from "No Child Left Behind," often entail damaging unforeseen consequences. To prevent doing unintended harm to American higher education, especially to the innovative and flexible nature of American higher education, accreditation bodies must be careful and deliberate in how they develop and apply universal standards. External validation threatens to undercut the "improvement of educational programs" by creating an environment (1) in which honest discussion of weakness is penalized, (2) in which the potential for penalty discourages educational innovation, and (3) in which institutions can "game the system" by substituting simple surrogates, such as standardized tests, for careful assessment of authentic student work.[2]

Although the WASC Commission resolution makes no mention of this, Wolff revealed in his meeting with UCEP that WASC opposes requiring the use of standardized tests to measure student learning. We share that opposition.[3]

We also are heartened to learn that WASC has made no commitment to the Lumina foundation to impose the Lumina Degree Qualifications Profile (DQP) on all institutions in the region, but we remain concerned that the DQP remains so central to WASC's thinking about accountability. In action item #4 of the November 3, 2011 Commission meeting, it is stated that, "The Degree Qualifications Profile (DQP) will be piloted through voluntary learning communities to assess its usefulness as a framework for assisting institutions to assess the quality of degrees or portions of degree programs." The term "pilot" implies that the volunteers who will first use the DQP will simply be leading the way for the rest of us. Although we appreciate your assurances that these "pilots" will help the Commission to determine whether or not the DQP has value, we would prefer the Commission's published language to reflect an openness to following a different course should the DQP not be effective. Perhaps the Commission could revise the last sentence of #4 to read, "The Commission will determine what uses of the DQP, *if any,* are appropriate for quality assurance.

In summary, UCEP wishes to convey to WASC that:
- assessing actual student work will improve student learning; as a public institution we are committed to such accountability.
- actions 1-3 and 5-10 taken by the Commission on November 3, 2011, are enough to ensure both "improvement of educational programs" and accountability.

---

[2] Just three of the "pitfalls" WASC staff member Barbara Wright discussed in her presentation on Benchmarking, October 21, 2011.

[3] See http://www.universityofcalifornia.edu/senate/underreview/HP_Senate_UEETF%20review%20request.pdf, pf pp 22-28 and 74-78.

- the existing program review process based on peer review used in the University of California meets the external validations concerns expressed by the Commission; if combined with publication of accreditation review results, it will also meet WASC's desire for transparency

The accompanying documents provide a thorough justification of these claims. We hope these documents will spur productive exchanges with the WASC staff and Commission and lead to the adoption of program review based on peer review as the preferred method of external validation of programs.

Sincerely,

Jose Wudka, Chair
UCEP

COORDINATING COMMITTEE ON GRADUATE AFFAIRS (CCGA)
Rachael Goodhue, Chair
goodhue@primal.ucdavis.edu

ACADEMIC SENATE
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

December 12, 2011

ROBERT ANDERSON
ACADEMIC COUNCIL CHAIR

Dear Bob:

CCGA endorses UCEP's memo to Academic Council regarding WASC. In addition, CCGA notes that as far as learning outcomes and assessment of *graduate* degrees are concerned, the University of California already has a strong process of approval and periodic review (including external reviewers in both processes). These processes require programs to articulate goals and expected outcomes and the means of assessment of achieving the intermediate and final goals of each degree (such as annual reviews, required research presentations, preliminary exams, oral qualifying exams, dissertations and theses and capstone projects, and job placement). CCGA would be happy to take a role in sharing these best practices with WASC, and sees no need for additional measures.

Furthermore, CCGA would particularly like to emphasize the unique nature of the Ph.D. degree. Rather than acquiring pre-determined skill sets, the focus of such a degree program is explicitly to create new knowledge, creative avenues, and modes of application of knowledge. Departments and programs oriented toward the production of specialized knowledge thus continuously and rigorously assess students in relation to the concrete goals of each respective degree.

Sincerely,

Rachael Goodhue, Ph.D.
Chair, CCGA

Copy: Martha Winnacker, Academic Senate Executive Director
        CCGA Members
        Prof. Jose Wudka, UCEP Chair

Enclosure

Follow-up Questions for Ralph Wolff from CCGA Meeting on December 6, 2011:

1) We agree completely with the broader goals of the DQP, that students should receive a broad education covering the 5 areas defined in the DQP. We are wondering, however, if the DQP goes too far in extending? General education? Beyond the freshman and sophomore years, and if in so doing it:

   – would slow down time to degree and
   – dilute the quality of advanced study at the Upper Division and Masters levels?

2) WASC question on review of PhD: The PhD is a unique degree title. Its focus is explicitly to create new knowledge, creative avenues, and modes of application of knowledge, and explicitly not to acquire a set of skills spelled out by a pre-determined rubric. Does WASC share this perspective? If not, why not? It seems that there is no intent of having the learning-outcome-oriented rubrics apply to PhD programs. Can you verify that?

   Also, CCGA is wondering about the evolution of WASC's views on review professional program activity on campuses. Does WASC have an official definition of what constitutes a professional program?

3) What is (are) the problem(s) the new guidelines are designed to address? Is there knowledge these problems exist within graduate level training at research focused universities? Should a separate accreditation track be considered for research universities?

4) What specific requirements are being considered for Master's degrees?

5) We understand that there was at least some discussion of a minimum number of units (30) without allowing for fewer units combined with a thesis or comprehensive examination. Is this discussion headed anywhere?

6) Given that the problems WASC seems to be most interested in addressing are primarily with the for-profit segment of higher education, might it make sense to consider a two-pronged approach to accreditation, one for non-profit and one for for-profit institutions?

7) CCGA would particularly like to emphasize the unique nature of the Ph.D. degree. Rather than acquiring pre-determined skill sets, the focus of such a degree program is explicitly to create new knowledge, creative avenues, and modes of application of knowledge. Departments and programs oriented toward the production of specialized knowledge thus continuously and rigorously assess students in relation to the concrete goals of each respective degree (in the form of annual reviews, required research presentations, preliminary exams, oral qualifying exams, dissertations and theses and capstone projects, job placement). Does WASC shares this perspective? If not, how does it understand the difference between a Master's degree and a doctorate? Or an undergraduate degree and a doctorate? From our discussion, it seems that there is no intent to apply learning-outcomes-oriented rubrics to Ph.D. programs. Can you verify and assure us that this is the case?