ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
Western Association of Schools and Colleges

Policy on Monitoring Institutional Performance
(New Policy First Reading June 2013)

The Commission's responsibility is to determine whether an institution is in compliance with Eligibility Requirements, Accreditation Standards and Commission policies and to assist institutions, through established procedures, in the improvement of quality.

Commission Monitoring of Institutional Performance

In support of its purposes, the Commission applies a set of annual monitoring and evaluation approaches that assess an institution's continued compliance with Eligibility Requirements, Accreditation Standards and Commission policies, and that take into account institutional strengths and stability. Such annual monitoring will include, but not be limited to:

• Headcount enrollment data
• Collection and analysis of key data and indicators of student achievement and student learning
• Collection and analysis of key data and indicators of fiscal stewardship and stability
• Such other elements as determined by the Commission

Responsibility of the Institution

It is the responsibility of the institution to inform the Commission of any circumstance that significantly impacts the institution's operational, academic and student service, or fiscal strength and stability or its compliance with Eligibility Requirements, Accreditation Standards and Commission policies.

Questions:
1. How do we ensure institutions respond consistently with integrity and accuracy?
2. Krista Johns - that is difficult between annual report and visit.
ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
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Policy on Credit for Prior Experiential Learning in Undergraduate Programs Direct Assessment of Learning

Background

It is the position of the Commission that the institution has a significant role beyond that of certifying what a student has learned elsewhere. It is within the institution that a student earns academic degrees.

Credit for prior experiential learning is offered only under the conditions enumerated below. This policy is not designed to apply to such practices as CLEP, advanced placement, or ACE evaluated military credit. Questions about this policy should be referred to Commission staff.

The growing complexity of policies and practices for transfer and award of credit has been brought about, in part, by the changing nature of postsecondary education. With increasing frequency, students are pursuing their education in a variety of institutional and extra-institutional settings. Policies on transfer and award of credit should encompass educational accomplishment attained in extra-institutional settings.

Most programs which provide students with the means to acquire knowledge and skills at an individual pace and then to demonstrate achievement of specific competencies to apply toward a course, certificate or degree, do so by clock hour or credit awards. However, an increasing number of programs provide for award of certificate or degree by direct assessment of student learning.2

Transfer and award of credit is a concept that increasingly involves transfer between dissimilar institutions and curricula and recognition of extra-institutional learning, as well as transfer between institutions and curricula with similar characteristics. As their personal circumstances and educational objectives change, students seek to have their learning, wherever and however attained, recognized by institutions where they enroll for further study. It is important for institutions to develop reasonable and definitive policies and procedures for acceptance of such learning experiences, as well as for the transfer of credits earned at another institution. Such policies and procedures should provide consideration for the individual student who has changed institutions or objectives. It is the receiving

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1 The background information comes from the Joint Statement on the Transfer and Award of Credit, initially created in 1978, and revised in 2001. The three signatories are national associations whose member institutions are directly involved in the transfer and award of academic credit: the American Association of Collegiate Registrars and Admissions Officers, the American Council on Education, and the Council for Higher Education Accreditation. Information from the March 19, 2013 Dear Colleague letter of the U.S. Department of Education on applying for Title IV eligibility for direct assessment (competency-based) programs is also included.

2 The U.S. Department of Education has clarified that programs of this nature may be approved for award of Federal Student Assistance (FSA), using an equivalency calculation of clock hours or credits to determine the basis for payment and award of FSA. However, FSA may be awarded only for learning overseen by the institution. Pre-collegiate coursework and preparatory coursework required for entry into a certificate or degree program do not qualify for FSA if they involve direct assessment of learning.
institutions' responsibility to provide reasonable and definitive policies and procedures for determining a student’s knowledge in required subject areas. Institutions also have a responsibility to advise the student that the work reflected on the transcript may or may not be accepted by a receiving institution as bearing the same (or any) credits as those awarded by the provider.

Basic to this statement is the principle that each institution is responsible for determining its own policies and practices with regard to the transfer, acceptance, and award of credit. Institutions are encouraged to review their policies and practices periodically to assure that they accomplish the institutions' objectives and that they function in a manner that is fair and equitable to all students. The institution's articulation and transfer procedures should evaluate courses, programs and other learning experiences on their learning outcomes, and the existence of valid measures for assessing learning.

Policy

ACCJC is committed to excellence and integrity in credits, certificates and degrees awarded by member institutions. Institutional policies and procedures must outline the process and standards by which direct assessment of learning is conducted and credits, certificates and degrees are for prior experiential learning is awarded.

Policy Elements

In developing and publishing its guidelines and procedures, it is required that institutions follow the principles of good practice in assessing experiential learning represented by the Council for the Advancement of Experiential Learning (CAEL) and the American Council on Education.

Assessing Learning

In making the determination whether to award college credits, certificates, and degrees to students for prior learning:

1. Credit or its equivalent should be awarded only for learning, and not for experience.
2. Assessment should be based on standards and criteria for the level of acceptable learning that are both agreed upon and made public published.
3. Assessment should be treated as an integral part of learning, not separate from it, and should be based on an understanding of learning processes.
4. The determination of credit awards and competence levels must be made by appropriate subject matter and academic or credentialing experts.
5. Credit or other credentialing should be appropriate to the context in which it is awarded and accepted.
6. If awards are for credit, transcript entries should clearly describe what learning is being recognized and should be monitored to avoid giving credit twice for the same learning.
7. Policies, procedures, and criteria applied to assessment, including provision for appeal, should be fully disclosed and prominently available to all parties involved in the assessment process.

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8. All personnel involved in the assessment of learning should pursue and receive adequate training and continuing professional development for the functions they perform.

9. Assessment programs should be regularly monitored, reviewed, evaluated, and revised as needed for currency, to reflect changes in the needs being served, the purposes being met, and the state of the assessment arts.

Selection of Evaluators

Faculty members who conduct the evaluation of prior learning experience exercise professional judgment and competency in applying the evaluative criteria and procedures. Faculty who are involved in evaluating prior learning should have the data necessary to determine the skills, competencies, and knowledge held by the candidate for direct assessment of learning, including position descriptions, outlines of training programs completed, and records of examinations taken, if any; and the means to compare the demonstrated learning with the learning outcomes acquired by students who have completed the related course or curriculum.

Ques. Is this the policy where we begin to look at MOOCs? Yes, but not for MOOCs offered within college. Explain this in memo to the field.

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Refer to the guides for the evaluation of educational experiences, Center for Adult Learning and Educational Credentials, American Council on Education (ACE), Washington, DC.
Policy on the Rights and Responsibilities of the Commission and Member Institutions

(Adopted January 200; Edited August 2007, October 2007; Revised June 2011, June 2012; Edited August 2012; First Reading June 2013)

Background

Students, the public, higher education bodies, and various levels of government need assurance that an accredited institution is of high quality and possesses integrity. American higher education has chosen to use a voluntary, non-governmental, self-regulatory process to provide this assurance. Such a process must balance institutional autonomy, independence, and freedom with an institution's responsibilities to its various constituencies. Therefore, the process must carefully delineate the rights and responsibilities of both the accrediting bodies and the institutions they accredit. Mutual understanding and respect for the rights and responsibilities of each party will assure that higher education remains fundamentally sound, responsible, responsive, and effective, so that the public may have confidence in the integrity and quality of educational institutions with a minimum need for government regulations.

Policy

The Commission is committed to partnering with a member institution in a voluntary non-governmental accreditation process that results in a mutual commitment to self-regulation, quality assurance to the public, and continuous institutional improvement. The Commission and its member institutions share rights and responsibilities to develop and promulgate Accreditation Standards and an agreed upon accrediting process for educational quality and institutional effectiveness review (formerly Institutional comprehensive review). The institutional Chief Executive Officer is the chief representative of the institution to the Commission. The Commission communicates to the institution primarily through the Chief Executive Officer.

Policy Elements

A. Development and Promulgation of Standards

The Commission has the responsibility to develop standards which are consistent with the purposes of accreditation, which are sufficiently flexible to allow diversity and effective program development, and which allow and encourage institutional/programmatic freedom and autonomy, and allow the institution to exercise its rights within a reasonable set of parameters relevant to the quality of education.

The Commission has the responsibility to provide opportunities for broad participation of affected constituencies in the development and acceptance of the Eligibility Requirements, Accreditation Standards, and Commission policies, and to permit institutional input on new or revised policies by providing for an opportunity for review at public meetings of the Commission and to consider such input from a member institution when making changes to the Eligibility Requirements, Accreditation Standards, and Commission policies.

A member institution has the responsibility to participate in development of the Eligibility Requirements, Accreditation Standards, and Commission policies and in the Commission's
periodic reviews. The Commission has the responsibility to develop and promulgate Eligibility Requirements, Accreditation Standards, and Commission policies that meet the requirements of the U.S. Department of Education (USDE) regarding a member institution’s eligibility for Title IV. The Institutional Chief Executive Officer and the Accreditation Liaison Officer have the responsibility to communicate and promulgate information to their institutional constituencies about the Eligibility Requirements, Accreditation Standards, and Commission policies, any changes to them, and the institution’s plans for changes needed to comply with them. A member institution has the responsibility to communicate directly to the Commission any comments on or concerns about the Commission’s Eligibility Requirements, Accreditation Standards, and policies.

B. Institutional Records of Accreditation

The Commission has the responsibility to provide, when requested, copies of correspondence pertaining to that institution to the Chief Executive Officer and, when appropriate, to the Accreditation Liaison Officer.

A member institution has the responsibility to develop an effective mechanism to ensure the internal coordination of accreditation activities. A member institution has the responsibility to maintain all correspondence and records on the accreditation history of the institution, and on substantive change applications and the outcomes of the application.

A member institution has the responsibility to share records of the institution’s accreditation history, as appropriate, within the campus community.

C. Information Collection

The Commission has the responsibility to specify items to be addressed in all reports to the Commission, require only information that is relevant to the Eligibility Requirements, Accreditation Standards, and Commission policies, and respect the confidentiality of information required and evaluated in the accreditation process. The Commission also collects information required by USDE regulations.

A member institution has the responsibility to: determine how to design and conduct the institutional self-evaluation process (formerly self-study process), involve broad and appropriate constituent groups in the preparation and process of the Self Evaluation Report of Educational Quality and Institutional Effectiveness, disclose to the Commission all information which is required to carry out the Commission evaluation and accreditation functions and respect the confidentiality of information required and evaluated in the accreditation process.

A member institution has the responsibility to maintain records of formal student complaints and grievances between each review cycle, and make them available to the Commission and evaluation team upon request, in accord with federal regulations. A member institution must submit substantive change proposals for approval by the Commission before such substantive changes are implemented.

D. Site Visits and Reviews

The Commission has the right to: conduct site visits as required under the Commission’s adopted accreditation processes; exercise its discretion whether or not to conduct joint, concurrent, coordinated, consolidated, or phased visits when requested by an institution;
and note in its accreditation documents any attempt by professional organizations, collective bargaining groups, or special interest groups to impede or interfere with participation in the educational quality and institutional effectiveness review process and visit. The Commission has the right to monitor and report as required by USDE regulations for recognized accrediting agencies.

A member institution has the right to request the Commission to hold joint, concurrent, coordinated, consolidated, or phased visits; and review the list of proposed evaluation team members in order to avoid potential conflicts of interest.

The Commission has the responsibility to select evaluation team members, who are competent by virtue of experience, training, and orientation, and are sensitive to the unique mission of the institution. Prior to the selection of the evaluation team, the Commission will consult with the institution to determine any special needs or concerns. The Commission has the responsibility to assure that evaluation team members are impartial, objective, and without conflict of interest and that the evaluation team is of an appropriate size and composition for the purposes of the site visit. The institution has the right and responsibility to review the evaluation team members and report any conflicts of interest or concerns to the Commission before the team composition is finalized. The Commission has the responsibility to assure that evaluation team members keep confidential all institutional information examined or heard before, during, and after the site visit. The Commission has the responsibility to set the length of a site visit, ordinarily three days for a review and one or more days, as needed, for a follow-up or any other special visit. The Commission has the responsibility to set the dates of the site visit in consultation with the institution.

The Commission also has the responsibility to communicate its findings derived from the site visit to the institution; ensure that the External Evaluation Report of Educational Quality and Institutional Effectiveness (formerly Team Report) identifies and distinguishes clearly between statements directly related to meeting the Accreditation Standards and those representing suggestions for quality improvement; provide the Chief Executive Officer of the institution with an opportunity to correct all factual errors in the draft External Evaluation Report and provide supplemental materials pertinent to the facts and conclusions in the External Evaluation Report before it takes action on the Institutional Self Evaluation and External Evaluation Report.

A member institution has the responsibility to provide maximum opportunity for communication between all relevant constituencies and the evaluation team; and ensure that professional organizations, collective bargaining groups, or special interest groups not impede or interfere with reports, visits, and reviews. A member institution also has the responsibility to make the External Evaluation Report available to the public. A member institution has the responsibility to acknowledge that specialized accrediting agency recognition, local governmental requirements and/or collective bargaining agreements, in and of themselves, do not abrogate or substitute institutional and employee obligations to comply with the Eligibility Requirements, Accreditation Standards, and Commission policies.

E. Accreditation Decisions

A member institution has the right to withdraw a request for any status of accreditation at any time prior to the decision on that request. A member institution also has the right to appeal an accreditation decision to deny accreditation or to terminate accreditation in
accordance with the policies of the Commission and to maintain accredited status during the appeal. A member institution has the right to withdraw from Commission membership by sending a written notice to the Commission of the intent to withdraw as of the end of the institutional semester or term. Ordinarily, the notice must be sent with adequate time for the Commission to approve the request at its next scheduled meeting\(^1\) prior to the anticipated date of withdrawal of accreditation.

The Commission has the responsibility to: permit the withdrawal of a request for any status of accreditation at any time prior to the decision on that request; require an institution voluntarily withdrawing from Commission membership to take appropriate steps to notify its student body, the U.S. Secretary of Education, appropriate state/governmental licensing and authorizing agencies, and the public, and where appropriate to follow the Commission's "Policy on Closing an Institution"; make decisions solely on the basis of published standards, policies, and procedures using information available and made known to the institution; avoid conflicts of interest in the decision-making process; and ensure the confidentiality of the deliberations in which accreditation decisions are made, and observe due process in all deliberations.

The Commission also has the responsibility to: notify institutions promptly in writing of accreditation decisions and give reasons for the actions; ensure that the communication of the final accreditation decision identifies and clearly distinguishes between statements directly related to meeting the Accreditation Standards and those representing suggestions for quality improvement; publish accrediting decisions, both affirmative and negative, except for initial denial of candidacy of eligibility (which are not made public); and maintain the confidentiality of the External Evaluation Report until after the Commission has acted on it. The Commission may require that corrective action be taken if an institution releases information misrepresenting or distorting any accreditation action taken by the Commission or the status of its affiliation with the Commission. If the institution is not prompt in taking corrective action, the Commission may release a public statement providing the correct information.

A member institution has the responsibility to accept the Commission's action after availing itself of its due process rights afforded in Commission policy, and to make public the Commission's action letter and the External Evaluation Report as well as the Institutional Self Evaluation Report. A member institution has the responsibility to uphold the credibility and integrity of the accreditation process by accurately portraying the Commission's actions and helping institutional constituencies to understand the Eligibility Requirements, Accreditation Standards, and Commission policies pertinent to an accreditation action taken on an institution. A member institution has a responsibility to respond to evaluation team or Commission recommendations within the time parameters set by the Commission.

F. Third Party Comment

A third-party comment may be submitted to the Commission at any time as it relates to the compliance of a member institution with Eligibility Requirements, Accreditation Standards, or Commission policies. Such comment must be submitted in writing, signed, and accompanied by the affiliation, return address and telephone number of the correspondent. Commission staff will review all third-party comments to assess its applicability to Eligibility Requirements, Accreditation Standards, or Commission policies.\(^1\)

\(^{1}\) The Commission meets in January and June of each calendar year to take actions on institutions.
policies. Institutions will be provided with an opportunity to review applicable third-party comment.\textsuperscript{2} An applicable third-party comment will be provided to the Commission.

A third-party comment also assists the Commission as it considers applications for reaffirmation of accreditation. When an institution is undergoing a review, the Commission requires the institution's chief executive officer to notify the campus community and public of the opportunity for submission of third-party comments and the process for doing so. In such cases, third-party comment should be received by the Commission no later than five weeks before the scheduled Commission consideration or meeting.

**FG. Follow-Up**

The Commission has the right to take action to assure that a member institution meets its responsibilities and to request periodic reports, special reports, annual reports, additional visits, and consultative activities relevant to the institution's accreditation status. The Commission has the right to request the reevaluation of an institution at any time as a means for monitoring specific developments within an institution between comprehensive evaluations.

If a member institution fails to make complete, accurate and honest disclosure of information required by the Commission, or if the institution does not comply with Commission requests, directives, decisions and policies, and make complete, accurate, and honest disclosure, then the Commission may act to impose a sanction, or to deny or revoke candidacy or accreditation.\textsuperscript{3}

**GH. Special Report and Visit**

The Commission requests a Special Report when it receives information that raises significant concerns about the institution's compliance with Eligibility Requirements, Accreditation Standards, and/or Commission policies. The institution may be required to provide a narrative report, evidentiary documents, and/or documents prepared by external third parties, such as external audits. The Commission may require a team visit, which will be scheduled after the due date for the Special Report. The Commission's letter requesting a special report will identify all specific requirements to be addressed by the institution.

The Commission has the responsibility to provide written notice to the institution of the action taken in relation to a special report or visit, support improvement of the educational effectiveness of an institution, and work with the institution to identify appropriate assistance.

\textsuperscript{2} If it is determined, in the review of the third party comment, there is the need to hold the contact confidential for legal, investigative or other purposes, then the institution will not be notified of the report made. Also, if the U.S. Department of Education requests certain reported information remain confidential, then there will be no notification to the institution. 34 C.F.R. § 602.27(b).

\textsuperscript{3} Eligibility Requirement 21. See also the Policy on Public Disclosure and Confidentiality, § II: "If an institution conducts its affairs so that it becomes a matter of public concern, misrepresents a Commission action, or uses the public forum to take issue with an action of the Commission relating to that institution, the Commission President may announce to the public, including the press, the action taken and the basis for that action, making public any pertinent information available to the Commission."