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Tuesday, December 04, 2001

Accrediting Commission for Community and Junior Colleges  
c/o Barbara A. Beno, Ph.D., Executive Director  
3402 Mendocino Avenue  
Santa Rosa, CA 95403  
RE: Draft A of Newly Proposed Accreditation Standards

The Research and Planning Group (RP Group) Board, representing the research and planning professionals of the California community colleges, appreciates the opportunity to submit comments regarding the newly proposed Accreditation standards.

The distinct feature of the proposed standards is the strong emphasis on the establishment and use of clear learning outcomes and their demonstrated achievement. We agree with this point expressed throughout the document. We believe this represents a serious effort to enhance the focus on student learning in our system and to introduce and implement good practices. We have been, across the board, highly supportive of these and other learning assessment activities, such as the Center for Student Success (CSS) and the California Assessment Initiative (CAI).

Our experiences indicate that there are various self-initiated assessment activities at many institutions in the California community college system, as there are various levels of understanding and acceptance of the newly proposed standards. We consider this to be expected and we base our feedback on this observation. In some areas, we as a system are behind other similar systems in embracing and developing learning assessment measures. The proposed standards spell out in broad and firm strokes the tasks of evaluating outcomes of learning across all components of a college. Although direct evidence of achievement of student learning and use of this information internally for improvement may represent the ultimate goal of the proposed standards, we believe the following constructive comments to be helpful in enhancing the culture in which the standards are successfully implemented. We will address the content of the proposal standards and the potential implementation issues separately.

The Content of the Standards:


- Since increased levels of knowledge of assessment of learning are critical to the success of accreditation, faculty, staff, and research and planning professionals must work together on this developmental effort. Assessment of learning represents an experiential development of explicating shared understandings and approaches and use of models and templates, itself similar to what we expect of students learning new disciplines of thought. Therefore, we suggest that the Commission allow for a phased-in timeframe for colleges to build processes and capabilities for their increasingly comprehensive approach to learning, and that the Commission clearly acknowledges this need early on in its Standards document. A phased-in timeframe could mean that a college would be required to address only certain core-general education courses and programs for the next round of accreditation and then a broader level of courses and programs for the second round.

- The proposed standards advocate precision in measuring learning (Standard One, Section B, Item 2). We interpret this to be using both data analysis and research to achieve successful assessment. We suggest adding the phrase “quantitative and qualitative research” in Standard One, Section B, Item 1 as follows. “The institution makes decisions regarding measuring and improving student learning by using [data] quantitative and qualitative research and analysis in a systematic cycle of evaluation, integrated planning, implementation, resource allocation, and re-evaluation. The institution relies upon [data] quantitative and qualitative research and analysis to identify student learning needs and to assess progress toward achieving stated outcomes.”

#### Implementation of the Standards:

- We understand one of the main purposes of the Commission is to set and determine the attainment of the standards (Standards document opening statement). As professionals sharing responsibilities of planning, monitoring and reporting related to institutional effectiveness and learning outcomes, researchers and planners look to the Commission for guidance in interpreting and implementing these standards. There is an immediate need for broad circulation of exemplary practices and case studies that the Commission deems appropriate as references, such as the document entitled, “A Guide to Using Evidence in the WASC Accreditation Process” authored by Peter Ewell and presented by Ralph Wolff at November CAIR (California Association of Institutional Research) Conference. We suggest that the Commission quickly make available documents, reports, and examples that will help the field become knowledgeable and skilled. Further, we suggest that the Commission provide trainings, address technical assistance needs, continue to encourage collaborative partnerships among institutions and tap the knowledge and skills of groups that have been involved in assessment of learning, including the RP Group.
- Measurement of educational effectiveness and learning is particularly sensitive to rule-based and explicitly recorded data. To achieve quality and consistency in our assessment activities, an adequate technological infrastructure specifically aimed for tracking, reporting and evaluation purposes in place on college campuses can be of great assistance to many measurement tasks. Entities within this infrastructure, such as data warehouses designed with learning outcomes taken into account, can provide higher efficiency in measuring learning outcomes. We find it necessary to clearly emphasize support for the above tasks in Standard III, Section B and Items 1 and 2. Without such emphasis, we may be faced with an inadequate technological base ill equipped to support various evaluation and assessment tasks once a majority of institutions have successfully planned and implemented assessment initiatives.

The RP Group Board once again expresses appreciation for this opportunity and acknowledges the hard work that the Commission has undertaken in bringing forward the proposed standards. We look forward to working with the Commission and faculty and staff to further enhance the success of student learning.



Jing Luan, Ph.D.  
President