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COMMISSION
for COMMUNITY and
JUNIOR COLLEGES**

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Date: January 31, 2013
To: Chancellors, Superintendents, and Presidents
cc: Accreditation Liaison Officers
From: Barbara A. Beno, President *Barbara A. Beno*
Subject: U.S. Department of Education Regulations on Institutional and Accrerator Use of Student Achievement Data in Accreditation

Since the 2008 Reauthorization of the Higher Education Act, the U.S. Department of Education (USDE) has acted several times to strengthen its regulations to ensure the quality of institutions eligible to participate in federal student aid and grant programs. I am writing to let you know about some of those recent regulatory changes concerning data on student achievement that were articulated to accrediting bodies in August 2012.

The recent regulations require institutions to set standards for student achievement; these standards may be tailored to the institution and its mission. The regulations also require accreditors to ask institutions to assess their own performance against the institution-set standards for student achievement. In addition, the regulations require accrediting agencies to examine and evaluate the reasonableness of institution-set performance standards related to student achievement, and to examine and evaluate the use of the institution's own data and analysis of performance and goals for improvement against those institution-set standards. College reports and evaluation team reports are to address in detail the student achievement standards and performance for each institution.

To support this mandated focus, the Accrediting Commission for Community and Junior Colleges (ACCJC) will be enhancing its review of student achievement in relation to institution-set standards for achievement, the use of that data in college decision-making, and the institution's efforts to make this information accessible to prospective students and other members of the public. The enhanced review will be seen in college annual reports submitted to the Commission, in clarified requirements for institutional self-evaluation reports, and in the training of external evaluation teams.

Attached you will find a chart provided to evaluation teams and institutions during training in preparation for comprehensive evaluation visits. The chart concerns evaluation of college work in areas recently highlighted by the USDE. Several of the items pertain specifically to student achievement data, but there are other areas of new emphasis as well. While the chart

attends directly to USDE concerns, it should be noted the member institutions of ACCJC have long endorsed the importance of student learning *and* achievement. The 2002 Accreditation Standards adopted from the field are an indication of this view, as are the significant efforts to improve student success underway in the region.

This year marks the completion of a 10-year period allocated for colleges to fully implement student learning outcomes assessment into college program review, planning, budgeting, and decision-making. It is timely now for the Commission to reintroduce its interest in college reporting of student achievement data.

Over the next few months, you will begin to hear more about the Commission's emphasis on student achievement results in various training and workshop sessions. Please note this is not a move by the Commission away from its request that institutions assess student learning and use the results to evaluate and improve educational effectiveness. The Commission believes that both student achievement data and analyses, and student outcomes data and analyses, are important components of an institutional quality improvement process.

Attachment

**Evaluation Responsibilities for
Compliance with U.S. Department of Education (USDE) Regulations
HEOA 2008 including 2010 and 2011 regulations interpreted through August 2012**

<p style="text-align: center;">PARAGRAPH OF 34 C.F.R.</p>	<p style="text-align: center;">USDE REGULATION AND USDE GUIDELINES FOR 34 C.F.R. § 602, JANUARY 2012</p>	<p style="text-align: center;">EVALUATION TEAM TASK</p>
<p>602.16(a)(1)(i)</p>	<p>Standards effectively address “success with respect to student achievement in relation to the institution’s mission,... including as appropriate consideration of course completion, State licensing examinations, and job placement rates.”</p> <p>Whether institutionally-developed standards to demonstrate student success are being used by the accreditor in the accreditation assessment, and the institution's performance with respect to student achievement is assessed.</p>	<p>The institution must set standards for satisfactory performance of student success (student achievement and student learning).</p> <p>The evaluation teams examine the institution-set standards for student success and achievement and assess their appropriateness. Evaluation teams examine institution summary data on course completion rates, licensure pass rates where available, and job placement rates where available. The team also examines program/certificate completion data, and graduation data provided by the college. These data are examined in the context of the institution-set standards of satisfactory performance and goals for improvement of student success (student achievement and student learning). The evaluation team cites this information as evidence of the institution’s accomplishment of mission. The evaluation team report cites the use of this evidence in describing its evaluation of how well the institution fulfills its mission.</p> <p><i>(Standards I.B; I.B.1-6; II.A; II.A.I.c; II.A.2.a,b, f, g, h, I; II.A.5; II.A.6; ER 10-Student Learning and Achievement)</i></p>
<p>602.16(a)(1)(viii) 602.24(e) 602.24(f)</p>	<p>Standards effectively address the quality of the institution or program in: “ensuring that any awarded academic credits/degrees/credentials conform to commonly accepted practice including time invested and content mastered.”</p>	<p>The evaluation team will examine and evaluate the reliability and accuracy of the institution’s assignment of credit hours by reviewing the institution’s related policies and procedures and application of those policies and procedures to programs and courses. The evaluation team samples at least five course outlines and corresponding syllabi, and examines the class schedule, to determine that the institution has assigned an appropriate amount of work to conform to the Carnegie Unit, and this sampling must include:</p> <ul style="list-style-type: none"> • At least one distance education course

<p>As pertains to: 600.2 (Credit Hour) 668.8(k),(l)</p>	<p>If the institution converts clock hours to credit hours for purposes of federal financial aid, the institution adheres to the Department of Education's 2011 conversion formula</p>	<ul style="list-style-type: none"> • At least one classroom based course with a laboratory • At least one course that provides for clinical practice, if applicable to the institution • At least one class that converts clock hours to credit hours for purposes of awarding credit, if the institution does so. <p>The evaluation team will examine institutional policies and procedures for measuring the program length and intended outcomes of degrees and certificates offered.</p> <p>The evaluation team will confirm the institution has transfer of credit policies that are publicly disclosed and that include a statement of the criteria regarding the transfer of credit earned at another institution of higher education.</p> <p>Since USDE regulations establish a <i>minimum</i> standard, and institutions may choose to include more work for their credit hours than the minimum amount, credit hours at one institution will not necessarily equate to credit hours at another institution for a similar program.</p> <p>The evaluation team will, in the External Evaluation Report narrative of its findings, cite the institution's policy, procedure, class and program evidence examined.</p> <p><i>(Standards I.B; I.B.1-6; II.A; II.A.1; II.A.2; II.A.2.h; II.A.6.a-c; ER 9-Academic Credit; Policy on Award of Credit; Policy on Institutional Degrees and Credits; Policy on Transfer of Credit)</i></p>
<p>602.16(a)(1)(ix) And related</p>	<p>The standards effectively address the quality of the institution in addressing: "the Record of student complaints received by, or available to, the agency."</p> <p>The institution "must make readily available to enrolled and</p>	<p>The evaluation team will be sent a copy of any complaints that have been filed with the ACCJC in accordance with the criteria for filing such complaints. The evaluation team will examine the institution's procedures which define student grievances/complaints and the manner in which they are received and will examine the institution's files containing student complaints/grievances for the five years preceding a comprehensive evaluation. The evaluation team will examine any patterns observed in the complaints to determine whether they constitute evidence that indicates the institution has failed to comply with Accreditation Standards, ERs and policies. Any deficiencies will be identified in</p>
<p>668.43</p>		

	<p>prospective students.... (a)(6) the names of associations, agencies or governmental bodies that accredit, approve or license the institution and its programs and the procedures by which documents describing that activity may be reviewed under paragraph (b).” (b) “the institution must make available for review to any student or prospective student upon request a copy of the documents describing an institutions accreditation and its State, Federal or tribal approval or licensing. The institution must also provide (those persons) with contact information for filing complaints with its accreditor and with its State approval or licensing entity and any other relevant State official or agency that would appropriately handle a student’s complaint.”</p>	<p>the team report as such.</p> <p><i>(Standards II.B: II.B.2.c: II.B.3 a; II.B.4: ER 20-Public Information; Policy on Student and Public Complaints Against Institutions)</i></p> <p>The evaluation team will examine the institution’s means of providing to any student or prospective student information about its accrediting bodies and governmental (usually state) licensing or approval bodies, copies of documents describing an institution’s accreditation or governmental approval, as well as contact information for filing complaints with such bodies. The team report will describe the institution’s compliance with this new requirement.</p> <p><i>(ER 20 – Public Information)</i></p> <p>The evaluation team will examine whether institutions make available to students located in states other than the institution’s home state, and receiving instruction from the institution (via distance education or correspondence education, or by other means) the contact information for filing complaints with the relevant governmental or approval body in that state in which the student is located.</p>
<p>602.17(f)</p>	<p>The agency provides a detailed written report that assesses the institution’s compliance with the agency’s standards, including areas needing improvement AND the institution’s performance with respect to student achievement.</p>	<p>The evaluation team will examine student achievement data at the programmatic and institutional levels. The institution must set standards of satisfactory performance for student achievement, and evaluate itself against those standards, at the programmatic and institutional levels. The evaluation teams must examine the institution’s own analyses, and also determine whether the institution’s standards for student achievement are reasonable.</p> <p>The examination will assess the institution’s performance with respect to the institution-set standards. The examination will be based upon data, and it will reference data cited above re 602.16, as well as other factors used by the institution. The External Evaluation Report will detail the institution’s</p>

<p>performance, noting both effective performance and areas in which improvement is needed.</p> <p><i>(Standard I.B.; Standard II.A.; Standard II.B.)</i></p>	<p>The evaluation team will review the manner in which the institution determines if a course is offered by distance education or correspondence education. The team will examine the delivery mode of a sampling of courses where students are separated from the instructors. The team must assess whether the courses are distance education (with regular and substantive interaction with the instructor, initiated by the instructor, and online activities are included as part of a student's grade) or correspondence education (online activities are primarily "paperwork related," including reading posted materials, posting homework and completing exams, and interaction with the instructor is initiated by the student as needed). Use of a learning management system alone will not determine whether the mode is distance education; course syllabi, grading policy, and actual instructional delivery determine how the mode is characterized for USDE purposes. The team will describe its findings and the team's judgment of the appropriateness of institutional application of the USDE delivery mode definitions.</p>
<p>The evaluation team will examine the efficacy of methods that the institution uses to verify the identity of students enrolled in distance education and correspondence education classes. The evaluation team will describe whether the institution uses the secure log in and password for its distance education classes. If the institution uses other methods for its distance education classes or correspondence classes, the evaluation team will describe those methods and the team's judgment of their efficacy in preserving the integrity of the credits and grades awarded.</p> <p><i>(Standards II.A; II.A.1; II.A.2; II.A.2.c, d, e; II.A.7; II.B.1; II.B.2.c; II.A.3.a; II.C.1; Policy on Distance Education and on Correspondence Education)</i></p>	

	<p>(ii) Proctored examinations</p> <p>(iii) New or other technologies and practices that are effective in verifying student identity</p>	
<p>602.19 (a-e)</p>	<p>The agency must demonstrate that it has and effectively applies a set of monitoring and evaluation approaches that enable the agency to identifyinstitutional strengths and stability. These approaches must include ... collection and analysis of key data and indicators, including fiscal information and measures of student achievement.</p>	<p>Comprehensive evaluation teams must examine the institution's longitudinal data on the institution's fiscal condition, including significant increases or decreases in revenues and enrollments, and identify any team concerns about fiscal stability. Comments should be included in Standard III.D.</p> <p><i>(Standards II.D; III.D.1.b, c, d; III.D.2.b, c, g; III.D.3; ER 17-Financial Resources; ER 18-Financial Accountability)</i></p> <p>Comprehensive evaluation teams must examine the institution's longitudinal data on student achievement (course completion, program/certificate completion, graduation, licensure, job placement data) and identify any team concerns about stability and achievement of mission, as well as any trends that identify strengthened institutional performance.</p> <p><i>(Standards I.B; I.B.1-6; II.A.1.c; II.A.2.a,b; II.A.2.f-i; II.A.5; ER 10-Student Learning and Achievement)</i></p>