



March 29, 2019  
UO Senate President  
and Professor of Economics  
William (Bill) Harbaugh

Dear NWCCU President Sonny Ramasamy and Commission Chair Brimhall:

I am writing as UO Senate President in response to the first round draft proposals for changes in the NWCCU's Accreditation Standards posted at <http://www.nwccu.org/wp-content/uploads/2019/01/Standards-for-Accreditation-2020-v6.pdf>.

Because I learned about this revision process only last Friday, and UO is currently on spring break, this letter comes from me in my role as President of the UO Senate, and not from the Senate in its entirety. If the Senate has additional comments I will forward these to you as soon as possible.

We understand that the motivation for these changes comes from the NWCCU's review and renewal by the National Advisory Committee on Institutional Quality and Integrity and the U.S. Department of Education, and we agree that a new look at the Eligibility Requirements and Standards were warranted, to move the NWCCU and the other accreditors toward a risk-based approach that used metrics on student outcomes as early-warning indicators of which institutions the NWCCU needs to focus its reaffirmation efforts on.

Our concerns with these proposed changes are focused on four areas: Academic freedom, shared governance, institutional control over transfer credits, and student success metrics and their use.

**Academic freedom:**

The NWCCU's current accreditation standards include robust support for academic freedom:

2.A.27 The institution publishes and adheres to policies, approved by its governing board, regarding academic freedom and responsibility that protect its constituencies from inappropriate internal and external influences, pressures, and harassment.

2.A.28 Within the context of its mission, core themes, and values, the institution defines and actively promotes an environment that supports independent thought



in the pursuit and dissemination of knowledge. It affirms the freedom of faculty, staff, administrators, and students to share their scholarship and reasoned conclusions with others. While the institution and individuals within the institution may hold to a particular personal, social, or religious philosophy, its constituencies are intellectually free to examine thought, reason, and perspectives of truth. Moreover, they allow others the freedom to do the same.

The first draft of the proposed new standards removes all this language. While the proposed Eligibility Requirements for accreditation at <http://www.nwccu.org/wp-content/uploads/2019/01/Eligibility-Requirements2020v3.pdf> do include language regarding academic freedom, such as

16. ACADEMIC FREEDOM The institution maintains an atmosphere in which intellectual freedom and independence exist. Faculty and students are free to examine and test all knowledge appropriate to their discipline or area of major study as judged by the academic/educational community in general.

this language is much weaker, and we believe that moving it from Accreditation Standards to Eligibility Requirements weakens how it will be evaluated. Our understanding is that during regular NWCCU cycles of reaffirmation of accreditation, institutional self-reports are expected to give examples of policies, practices and events that support the Accreditation Standards, and that the NWCCU's visitors measure those self-reports against the Accreditation Standards, and that the Eligibility Requirements receive less regular attention.

Therefore we believe that the movement and the weakening of the academic freedom language will weaken academic freedom, and weaken the ability of our students and their teachers to explore and express challenging ideas. We believe that the original language should be retained in any new Accreditation Standards, and that these standards should make clear that the NWCCU expects self-study reports to include information on the institution's academic freedom policy language and a summary of any events that involve discipline of students, faculty, or other university community members in situations that involve academic freedom.

We urge that the current language be retained in the Accreditation Standards.

### **Shared governance:**

1) The tradition and practice in American higher education is for universities and colleges to have a system of shared governance. This typically involves ultimate control



vested in a board of trustees, which then delegates day-to-day administration to a president, and substantial control over academic matters to the faculty with input from the administration and students.

In practice, at most colleges and universities this means that faculty have the primary responsibility for the design and approval of courses and academic programs, and such matters as grading and teaching evaluation. The current NWCCU standards are in line with this, stating that:

2.A.1 The institution demonstrates an effective and widely understood system of governance with clearly defined authority, roles, and responsibilities. Its decision-making structures and processes make provision for the consideration of the views of faculty, staff, administrators, and students on matters in which they have a direct and reasonable interest. ...

2.C.5 Faculty, through well-defined structures and processes with clearly defined authority and responsibilities, exercise a major role in the design, approval, implementation, and revision of the curriculum, and have an active role in the selection of new faculty. Faculty with teaching responsibilities take collective responsibility for fostering and assessing student achievement of clearly identified learning outcomes.

The draft new standards remove these as Accreditation Standards, replacing the specific language above about the role of faculty with unenforceable generalities. We believe that the principle of shared governance is important, and that it should remain in the Accreditation Standards, with the current language as a minimum requirement.

**2)** The current accreditation standards recognize that the power of governing boards must come with responsibility, stating:

2.A.6 The board establishes, reviews regularly, revises as necessary, and exercises broad oversight of institutional policies, including those regarding its own organization and operation. ...

2.A.8 The board regularly evaluates its performance to ensure its duties and responsibilities are fulfilled in an effective and efficient manner.

We believe that the requirement for board review must be maintained, and that the language of 2.A.8 should be strengthened to say:



**2.A.8 The board evaluates and publicly reports its performance at least every two years, with feedback from students, faculty, and administrators, to ensure its duties and responsibilities are fulfilled in an effective, efficient, and transparent manner.**

**Institutional control over accepting transfer credits:**

The NWCCU's current accreditation standards for this are excellent, e.g.:

2.C.8 The final judgment in accepting transfer credit is the responsibility of the receiving institution. Transfer credit is accepted according to procedures which provide adequate safeguards to ensure high academic quality, relevance to the students' programs, and integrity of the receiving institution's degrees. In accepting transfer credit, the receiving institution ensures that the credit accepted is appropriate for its programs and comparable in nature, content, academic quality, and level to credit it offers. Where patterns of student enrollment between institutions are identified, the institution develops articulation agreements between the institutions.

These standards recognize that decisions about accepting transfer credits should be made at a local level, by those who know the most about the requirements of their specific majors and fields of study, and who have the most at stake in the success of their students. We believe that these standards should not be weakened. But this is what the draft new standards do, by removing the language above about the role of the faculty and weakening the language about institutional control, replacing it with language such as:

1.C.8 Transfer credit and credit for prior learning is accepted according to procedures that provide adequate safeguards to ensure high academic quality. In accepting transfer credit, the receiving institution ensures that the credit accepted is appropriate for its programs and comparable in nature, content, academic rigor and quality, and comparable to credit it offers.

This proposed wording leaves open the possibility that federal, state, or other entities could dictate policies for transfer credits, leaving the NWCCU the role of simply ensuring that accredited institutions accept those standards so long as they meet some minimal level of adequate safeguards, without considering the judgement of institutions and their faculty to account for institutional differences.

**Student success:**



We support the new emphasis on student success in the proposed standards. Our understanding is that the current reconsideration of accreditation standards is in part driven by a desire to focus on student outcomes. That said, it is a well known principle that:

"The more any quantitative social indicator is used for social decision-making, the more subject it will be to corruption pressures and the more apt it will be to distort and corrupt the social processes it is intended to monitor." (Campbell's Law to psychologists, but also claimed in similar form by sociologists, political scientists, and economists.)

In this academic spirit, while we agree that it makes sense to use metrics such as time to graduation, retention, and student debt as warning signs of when the NWCCU should take particular care with reaffirming an institution's accreditation, and we support the new standards emphasis on transparency for these metrics, we believe it is a mistake to focus focus on these sorts of institutional metrics while weakening NWCCU support for policies such as academic freedom and shared governance, which have a long history of producing high quality education, research, and well educated and successful students.

### **Conclusion:**

The scope of the proposed changes to the NWCCU Accreditation Standards is very broad. Given this we were disappointed that so few of our institution's academic Senates had even been notified by their NWCCU Accreditation Liaison Officer's that this process of revision had been started, and that as a result there has been essentially zero faculty participation in the drafting of the standards that we have commented on above.

We ask, in light of the above, that the NWCCU push back the timeline for revision by at least six months and that the new timeline include another round of drafts, after additional town halls and surveys.

We ask that the NWCCU specifically instruct the institutional Accreditation Liaison Officers to work with AAUP bodies, faculty and university Senates, and other shared and faculty governance bodies to keep them informed about future drafts and opportunities for input.



UNIVERSITY OF OREGON

We appreciate President Ramaswamy and his staff's willingness to talk with members of the AAUP-Oregon on the phone this week and to give our member institutions additional time to prepare these comments on the first draft of these proposed Accreditation Standards so that they can be considered in preparing the next draft.

Yours,

A handwritten signature in black ink on a light gray background, reading "W. T. Harbaugh".

Bill Harbaugh  
UO Senate President & Professor of Economics