

**REPORT TO THE BOARD OF REGENTS
ON RECENT RECOMMENDATIONS MADE BY THE
ACCREDITING COMMISSION FOR
COMMUNITY AND JUNIOR COLLEGES
REGARDING THE
UNIVERSITY OF HAWAI'I COMMUNITY COLLEGES**

February 25, 2004

Report on Recent Recommendations Made by the Accrediting Commission for Community and Junior Colleges Regarding the University of Hawai`i Community Colleges

This document was prepared in response to a request by the Board of Regents for a report which addresses all the recommendations made by the Commission in recent communications to the University.

The Commission's recommendations were developed in the context of three separate activities:

- I. The review of regularly required Midterm reports from each campus, and related visits to Kaua`i CC and Leeward CC;
- II. The required visit to the University as part of the continuing Substantive Change review related to the December 2002 reorganization of the system; and
- III. The Commission's policy relating to annual audits of each accredited institution.

Each of the University of Hawai`i community colleges is separately accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association for Schools and Colleges (WASC). In October and November 2003 each campus submitted a required Midterm Report, and the University system submitted a requested progress report on the system reorganization. In January 2004, The Commission accepted the various reports and made a number of recommendations for implementation by the dates of their next series of visits.

I. Community Colleges' Midterm Reports

In June 2000, the ACCJC reaffirmed the accreditation of each campus through the 2006-2007 Academic Year. This is the maximum time period allowed by ACCJC policy. In the third year following the evaluation team visit in 2000, all institutions were expected to submit a progress report cataloging the institution's responses to the evaluation team recommendations. The Midterm Report for each community college addresses each of the recommendations made by the team by providing: a description of the response, an assessment of the progress made in fulfilling the team's recommendations, and a plan for the activities expected to be completed before the next comprehensive self study and evaluation visit.

Detailed campus progress reports were prepared and submitted to the ACCJC in October 2003 and two campuses were visited in November by teams representing the ACCJC. The Commission at its January 2004 meeting accepted the campus reports and separately requested that each campus respond to specific recommendations prior to its next scheduled visit in fall 2006.

All of the campuses had the same recommendation related to the Commission's systemwide concern on the lack of an active program review and integrated planning process. This recommendation is also included in the System Substantive Change Report as Recommendation 2. That recommendation and the details related to its resolution are detailed in the next section of the report.

In addition, several campuses had additional recommendations specific to issues at the respective campus. These recommendations and campus responses are detailed in Attachment 1.

II. Substantive Change Report on the System Reorganization

In December 2002, the Board of Regents approved a reorganization that eliminated the office of the Chancellor for Community Colleges, changed the titles of the campus chief executive officer from Provost to Chancellor, and reassigned the functions of community college staff to various system-level vice presidential offices. This change, because it was of a substantive nature, required the approval of the ACCJC.

As part of the action approving the reorganization, the ACCJC requested (Attachment 2) reports by August 1, 2003, November 1, 2003 and April 1, 2004 covering various aspects of the implementation of the reorganization. The November 1 report was followed by a visit from representatives from the Commission, who produced a report on the outcomes of the visit and the progress the University has made to date (Attachment 3). In January 2004, the Commission formally accepted the August and November reports and requested that the community colleges respond to three additional recommendations.

The report due on April 1 will focus upon the issue of how the University system structure has been staffed and funded as originally requested by the Commission, as well as detailing the progress we have made on the three new recommendations. The April 1 report will be followed by a visit from the Commission staff.

Recommendation 1: The team recommends the University of Hawaii Community College system and the University of Hawaii give careful thought to what would be the most effective delegation of responsibility and authority in personnel functions to the individual campuses, provide clear delineation of same, and ensure the college staffs receive appropriate training and support to conduct personnel functions in a manner that is consistent with Commission standards and which protects the overall integrity of the University of Hawaii personnel system.

This recommendation is related to the final implementation issues on the system reorganization. The allocation of responsibilities between the community college campuses and the support services previously provided by the Office of the Chancellor for Community Colleges has been an on-going discussion among the CC Chancellors and the UH system Vice Presidents. It has been decided that the CC Human Resources

Office will continue to coordinate and provide staff support services to the campuses in certain areas such as, but not limited to, the tenure and promotion process. In addition, the campuses were provided training in areas for which they have assumed the authority currently delegated to all Chancellors. Certain campuses – typically the smaller ones -- have not been able to assume the full scope of delegated responsibilities. Therefore, the CC Human Resources Office continues to provide staff support services to the campuses in various areas as needed on a campus-by-campus basis.

Recommendation 2: The Team recommends that the UH Community Colleges develop policies and procedures to ensure:

- a. that the community colleges engage in regular assessment of institutional effectiveness, including program review;**
- b. that the community college system as well as each college sets priorities for implementing plans for improvement that are based in an analysis of research data;**
- c. that the colleges and the UHCC system incorporates these priorities into resource distribution processes and decisions;**
- d. that the colleges and the UHCC system develop and employ a methodology for assessing overall institutional effectiveness and progress toward meeting goals expressed through plans for improvements; and**
- e. that the colleges and the UHCC system report regularly to internal constituencies and the Board on this progress.**

There are several different factors that have contributed to the ACCJC making this specific recommendation at this time:

ACCJC Issues – Historically, the Commission has experienced difficulties in getting multi-campus districts to respond to their concerns about practices on separately accredited colleges within the district. Their new approach is to hold each individual campus responsible for adopting policies and procedures at the campus level that meet the ACCJC standards.

In June 2002, the ACCJC adopted a new set of standards that placed a greater emphasis on the issues of assessment, planning and institutional change in response to the issues that come out of the assessment of program and student outcomes. The new policies call for each campus to develop policies and procedures for program review and the integration of the outcomes of the assessment into the planning and budgeting process, and are quite similar to the current University of Hawai'i system policies. These new requirements went into effect and will be used by all colleges seeking accreditation starting with the 2003-2004 academic year. Under the previous University of Hawai'i system administrative configuration, these specific policies were promulgated by the Chancellor for Community Colleges for implementation at each campus. In the new system administrative configuration these need to become campus-based

policies. All of the campuses have yet to formally adopt comparable policies at the campus level.

For several campuses, the issue of developing a closer relationship between their assessment, planning, budget development, and resource allocation decisions has been the subject of recommendations from prior ACCJC campus visits. The inability of the Kaua'i and Leeward campuses to move more quickly on prior recommendations has resulted in them being given a Warning by the Commission. While this action does not change their accredited status, or adversely effect students, it does require prompt attention to the issues by the faculty and staff of each campus or further sanctions could be applied.

The Commission has a policy that details the various sanctions it may impose in response to issues of concern that have been brought to its attention. The first level is that of Warning, the next level is Probation, and the highest level is Show Cause. This is a progressive series so that if the institution does not respond in a timely and appropriate manner to the Commission's sanction, it can progress to the next level of sanction. Following the Show Cause level, the Commission may remove accreditation from the institution.

According to Commission policy, Warning means:

The institution deviates from the Commission's eligibility criteria, standards, or policies to the degree that the institution's continued accreditation may become jeopardized. The warning may require the institution to correct deficiencies, refrain from certain activities, or initiate certain actions. Failure to respond effectively to prior Commission actions may result in a warning. The action is not reported as a public negative action. Institutional reports, visits, and resolution of the concerns are required within two years.

Changing External Requirements - Each year, the UH community colleges receive approximately \$2.2 M annually through the federal Carl Perkins Vocational Education Act for program improvement activities. When the Act was reauthorized in 1990, a new provision was added that called for the evaluation of all career and technical programs every year. Given the scope of the existing program review requirements detailed in University Executive Policy and the Community Colleges policy, and the available professional staff resources, it was not possible to use the existing University procedures to evaluate every program every year. Therefore, it was necessary to develop a new program assessment process if we were to continue receiving the federal Perkins Act funds. The Community Colleges designed a new approach that had become known as the Program Health Indicators assessment.

The Program Health Indicators Model provides a relatively comprehensive, yet succinct, review of the activities of academic programs, incorporating extant information, including empirical data, which is comparable across programs and campuses. Major sections of the report provide descriptive information about the development and history of a program, program goals, faculty and advisory

committee of the program, admission and degree requirements, courses offered in the most recent academic year and course enrollments, and program health indicators, including graphic representation of standing of the program on several of the indicators and, finally, and analysis of the program outcomes. Three major clusters of program health indicators are collected, reflecting program demand, program efficiency and program outcomes. For each program an annual report is prepared that contains: Program Description; Program Goals; Program Health Indicators; Graphic Representation of Selected Program Health Indicator Values; Program Outcomes Analysis; Program History; Program Admission Requirements; Program Degree Requirements; Program Courses and Enrollment; Program Faculty; Program Advisory Committee.

The Program Health indicators model was presented to the University system administration and the Board of Regents and deemed appropriate as a substitute for existing policies and procedures. However, with the ACCJC adoption of new standards requiring a five-year historical analysis of each program, our existing annual assessment process was determined to be inconsistent with the Commission's requirements. One approach to resolving this apparent dilemma is to develop a policy and practice that would roll-up a series of annual assessments into an in-depth multi-year assessment that would meet ACCJC expectations.

On January 6 and 7, the community colleges convened approximately 140 faculty, staff and administrators in a workshop to develop a better understanding of the new ACCJC standards, to assess existing policies and practices, and to develop an action plan to make the changes necessary to meet the expectations at each campus. The ACCJC has requested a progress report on these issues and will scheduled a return visit to selected campuses in the fall. We are on-track to demonstrate significant progress on these issues by the time of that report and visit.

Recommendation 3: The Team recommends that the governing board review its responsibilities to serve as a policy making board and to assume its role in evaluating the University President. The Board of Regents should develop appropriate policies to guide administrative hiring processes and then allow the University President to implement and administer policies. The Board should refrain from making operational decisions more appropriately delegated to the system chief administrator, the University President.

The Administration and the Board of Regents office are in discussion about the development of a procedure which would permit the creation of a "consent agenda" which could serve to give a greater sense of automaticity to the administrative hiring processes.

III. The Commission's Policy Related to Annual Audits of Each Accredited Institution

In its action of January 23, the Commission noted "that the University of Hawaii Community Colleges need to develop an annual independent audit that addresses Commission policies on financial management and stability." They also requested two full audits of the most recent years by the time of our next Comprehensive Review in fall 2006.

It is the policy of the ACCJC that in order to establish and maintain an accredited status:

The institution must undergo annually and make available an external financial audit by a certified public accountant or an audit by an appropriate public agency. The institution must submit with its eligibility application a copy of the budget and institutional financial audits and management letters prepared by an outside certified public accountant who has no other relationship to the institution for its two most recent fiscal years, including the fiscal year ending immediately prior to the date of the submission of the application. The audits must be certified and any exceptions explained. It is recommended that the auditor employ as a guide Audits of Colleges and Universities, published by the American Institute of Certified Public Accountants.

In years past, the community colleges have used the University's annual audit and the financial details for the community college system and respective campuses to meet this requirement. According to our discussion with Commission staff, U. S. Department of Education regulations now require them to enforce this policy for each separately accredited institution.

However, it is still unclear to ACCJC what level of audit will meet this requirement for a multi-campus system. This is an important issue, because the cost to comply with this requirement is dependent upon the specific type of audited financial statement the Commission determines is appropriate for colleges that are part of multi-campus systems. Until there is a clear statement from the Commission, we are not able to provide a detailed report on the costs associated with having separate financial audits.

In an attempt to clarify this requirement, the ACCJC has organized a workgroup from among its member colleges to determine the most appropriate and cost-effective way for campuses in multi-campus systems to meet this requirement. Associate Vice President Michael Unebasami has been asked by Commission staff to participate in that initiative. The first meeting of the group is scheduled for the first week in March. We are hopeful that they will be able to complete their work quickly so we can meet the Commission's request for two years of appropriate financial data in time for their fall 2006 campus visits.