



VETERANS EDUCATION SUCCESS®

October 6, 2022

President Jamiene S. Studley
WASC Senior College and University Commission
1080 Marina Village Parkway
Suite 500
Alameda, CA 94501

Re: Revised WSCUC Standards of Accreditation

Dear President Studley,

I write to respectfully submit comments on the Commission's ongoing revision of WSCUC Standards of accreditation and to respond to some of the questions for which the Commission has solicited comments.

I would like to appreciatively acknowledge the open and inclusive approach with which the Commission has undertaken its important work. That broad and consultative process has undoubtedly improved the Standards and simultaneously engaged all stakeholders in a collaborative effort to strengthen WSCUC's quality assurance role.

The revised Standards should also be specially praised for their proper emphasis on evidence and outcomes. This focus on outcomes and data is all the more noteworthy in light of the Commission's launch of its Key Indicators Dashboard.

I would like to also recognize the difficulty of balancing the articulation of inherently general standards against the need for criteria that are sufficiently specific to be actionable. Whether the revised Standards and CFRs strike the proper balance between the two extremes is ultimately a function of the Commission's internal processes and implementation procedures. Given the diversity of missions and institutional types that the Commission reviews, the CFRs must, of necessity, be flexible enough to accommodate legitimate differences. At the same time, the Commission must provide adequate and consistent guidance on its interpretation of the CFRs to enable it to verify or falsify institutional claims of compliance. Without the necessary scaffolding of such guidance and procedures, the Commission runs the risk of CFRs that are unenforceable because they could accommodate virtually any institutional practice. I hope that the revised CFRs will be accompanied by strong monitoring, oversight, and enforcement practices by the Commission.

Addressing several of the questions posed by the Commission, I believe the revised Standards provide a strong and appropriate emphasis on diversity, equity, and inclusion, which are cited in three of the four Standards under review. While it may be more of a stylistic matter, one could envision a foundational statement that more explicitly articulates the axiomatic definition of an institution of higher education—an entity engaged in the transmission and advancement of knowledge through instruction and scholarship—and logically derives from it, as an educational necessity, a mandate for diversity, equity, and inclusion. Such an approach would also serve to ground the mutual obligations that institutions and society owe to one another: the development of better informed, engaged, and more productive citizens in exchange for appropriate financial support and sufficient academic independence. This latter point would also provide the needed context for an affirmative response to the question the Commission has posed about institutional responsibilities for the promotion of civic engagement.

The Commission notes its elimination of the current CFR addressing transfer students and solicits comments on the broader issue of credit recognition. I would strongly support a change that would more universally address policies and practices regarding credit evaluation and credit recognition in connection with inter-institutional transfers as well as other academically creditable forms of prior learning, including military training. As always, the award of credit must preserve the integrity of academic credentials incorporating such credits and be anchored in an analysis of quality, comparability, and applicability as articulated in ACE et al's *Joint Statement on the Transfer and Award of Credit*.

I believe the Commission has accomplished a significant revision of the Standards and CFRs, and that the revisions successfully clarify and improve upon the current language. The one exception I would encourage the Commission to reconsider is the apparent substitution of revised CFR 3.8 for the current CFR 1.5. While both statements aim at articulating the same criterion, the language of the current CFR is, in my view, better articulated, more compelling, and more actionable than the proposed CFR's language.

I congratulate the Commission for its thoughtful and intentional effort to revise its Standards and look forward to their robust implementation and enforcement. I appreciate the opportunity to offer comments on its impressive work.

Sincerely,

A handwritten signature in black ink, appearing to read "Barmak Nassirian". The signature is fluid and cursive, with a large initial "B" and "N".

Barmak Nassirian

Vice President for Higher Education Policy