December 15, 2014

Dr. Barbara Beno, President
Accrediting Commission for
Community and Junior Colleges
10 Commercial Boulevard, Suite 204
Novato, CA 94949

Dear President Beno:

Santa Ana College received its final External Evaluation Report and is now submitting this letter of recommended corrections to the attention of the Commission, in order to meet the Tuesday afternoon, December 16, 2014 (noon) deadline. Consistent with the ACCJC review process, much of the information being brought to the attention of the Commission now was provided as a response to the initial report draft. We appreciate the opportunity to continue to address inaccuracies identified in the final External Evaluation Report in order for the Commission to have complete information as they deliberate on the status of the College's accreditation.

We appreciate the hard work of the External Evaluation Team and the leadership provided by Ms. Jill Stearns. All of the members were wonderful colleagues and genuinely supportive of our College in the spirit of sustainable, continuous quality improvement. The College is also grateful for the Team's various commendations, and outside of the specific examples that will be noted below (*with italicized, parenthetical page numbers corresponding to the External Evaluation Report*), concurs with the findings of the External Evaluation Report.

Inaccuracies of the Report

Recommendation 3: Santa Ana College believes it has provided appropriate documentation for the removal of Recommendation 3 (*pp. 6, 34*). Student learning outcomes were available for programs, certificates, and degrees during the Team visit and continue to be available on the public website for all to view.[1,2] While the College will continue to strive to devise a more universal, user-friendly online template to be used for aggregating all program, certificate, and degree data, the student learning outcomes data are routinely and consistently published as well as discussed, based on capstone quadrennial program review cycles supported by the College's Teaching Learning Committee.[3]

Therefore, it is respectfully requested that this recommendation be removed,

as the institution systematically strives to improve upon student learning outcomes assessment and makes the results available to appropriate constituencies (Standard II.A.2.f), which includes the public.

Standard IB: The Team noted that "The College is challenged by a lack of capacity for data analysis and research in support of institutional effectiveness" (*pp. 25*). It was later stated that "The College has not demonstrated ongoing and systematic evaluation and refinement of key processes, as part of the regular cycle of evaluation, to support increased institutional effectiveness" (*pp. 27*). However, both statements appear contrary to a prior claim made via Eligibility Requirement 19 (*pp. 17*), where the Team states:

> …Santa Ana College has established processes that incorporate data on student achievement and student learning in its planning, to determine student needs, and to allocate resources. The College has been actively working to improve its planning and program review processes, and its use of data analysis, to produce more effective governance and resource allocation procedures and to improve student learning. The College has institutional plans that include goals with measurable outcomes to determine progress toward achieving the planned goals.

In response to Standard IB, the Team was provided the link to our program review website weeks in advance of the Team visit, which documents substantial evidence available for the public to view with respect to Program Review and Planning for instructional and non-instructional units across the College.[1] Capstone quadrennial program review reports as well as annual goals updating, program-level reviews, and course-level reviews provide data analysis and rationale to the administration for Resource Allocation Requests.[4] In addition, the College's Planning & Budget Committee publishes its annual Resource Allocation Requests, which triangulate resource requests with the mission of the College and goals of a particular department or division as related to student learning.[5] Finally, as will be noted later in this letter via **Standard IIA, IIB, and IIC** as well as **Standard IVA and IVB** response prompts, the College implemented the position of coordinator for Institutional Effectiveness & Assessment several years ago; this coordinator works closely with the District Researcher to ensure ongoing integrated planning and collaboration in support of the College's overall institutional effectiveness efforts.

Therefore, it is respectfully requested that the references to the College not meeting the Standard (*pp. 25, 27*) be removed.

Standard IIA, IIB, and IIC: The External Evaluation Report concludes that "While student learning and achievement data is collected, the widespread analysis, dissemination, and the use of this data remain a work in progress" (*pp. 34*). Furthermore, it is noted that "The evidence of outcomes assessment leading to improvements in institutional effectiveness was not documented in a comprehensive manner and required confirmation through multiple interviews by the evaluation team" (*pp. 37*). Therefore, it is claimed that the College does not (fully) meet the Standard(s). However, these observations are clearly not synchronous with the work that the College has previously undertaken and continues to support through the work of the Teaching

Learning Committee (TLC) as well as the Rancho Santiago Community College District (RSCCD) Research office.

The TLC has been in existence for more than ten years, and it has annually reviewed program review capstone PA/PR reports, aggregated student learning outcomes results, as well as supported interdisciplinary and cross-disciplinary faculty dialogue, and these results are widely disseminated to the public through the College's website.[1, 6] The TLC is a committee with reportage to the Academic Senate through the College's Curriculum Committee. Furthermore, the RSCCD Research office has and continues to support publishing a series of department and program reports[7] along with college-wide reports[8] on student retention, persistence, and performance to help facilitate institutional effectiveness in our collective efforts to enhance overall student learning. In fact, the RSCCD Researcher, Ms. Nga Pham, is an active member of the TLC, regularly attends the bimonthly meetings, and creates requested reports as well as provides regular research updates to College faculty and staff.[6] Joint collaboration between the TLC and the RSCCD Research office continue to foster ongoing faculty dialogue and collaboration in support of continuous quality improvement efforts.

There are multiple examples where student learning outcomes data are correlated with improvements in academic support services. For example, through its quadrennial program review, the library has successfully synthesized relevant programmatic data to advocate for enhanced programmatic support to better enhance student learning.[9]

Therefore, it is respectfully requested that any references to the College not (fully) meeting the Standard be removed (*pp. 34, 37, 40*).

Standard IIIC and IIID: Santa Ana College believes it has indeed established, implemented, and documented a regular cycle of evaluation to include the effectiveness of planning processes, training, decision-making, communication, resource allocation, and governance practices. The College's institutional effectiveness and assessment survey instrument[10] is administered regularly and gathers qualitative data from the college community, informing the President, Cabinet, and participatory governance committees on the level at which the areas outlined in the Standard are met. [11] These are used as a starting point for continuous process and program improvement.

With respect to Standard IIID, a clear example of utilizing data gathered from assessment instruments to continuously improve the effectiveness of College planning and resource allocation is the implemented change for FY 2015/16's Resource Allocation Request (or RAR) forms, which include identified areas for institution-wide resource requests that impact the College as a whole, not just one department or division. This change was made in response to end-user feedback that was garnered related to the FY 2014/15 RAR process. Yearly evaluation, consistent with goals set forth by the College's Planning & Budget Committee, is undertaken to ensure that continuous improvement is made on the College's resource allocation process.[12] Qualitative data is captured and analyzed in order to better meet the needs of our end-users and constituents throughout the campus community.

Santa Ana College does have regular, cyclical evaluation and assessment instruments, and the results aid in continuous improvement for our College. This same rationale noted above can be used when inspecting Standard IIIC for technology. While this instrument will inevitably evolve as part of our sustainable, continuous quality improvement efforts, the unit of analysis focuses on the campus community and aims to evaluate the effectiveness of our planning processes, training, decision-making, communication, resource allocation, and governance practices.

Therefore, it is respectfully requested that the references to the College not fully meeting the Standard (*pp. 49, 53*) be removed.

Standard IVA and IVB: The External Evaluation Report claims that: "The method of assessing the effectiveness of its participatory governance processes is not documented in a manner that reflects the effectiveness of the process itself…" (*pp. 56*). However, in addition to annual surveys[10] administered by the College, the District does indeed participate in both internal and external scans assessment of its governance structure, as depicted through the District Services' Department Planning Portfolios for Planning, Evaluation, and Resource Allocation.[13, 14] Each District governance and decision-making structure creates a portfolio that describes its department; assesses its functions and services (in terms of staffing, budgeting, customers and services); identifies its service initiative and unit outcomes as they relate to the RSCCD goals and strategic plan objectives; and lists resources (personnel, technology, and fiscal needs) to complement the work it produces, similar to the College's Program Review process. The two-year cycle of evaluation encourages department staff to regularly assess individual programs, and the manner in which the needs of their clients/customers are addressed, in order to maximize the department's strengths and implement improvements wherever possible.

The External Evaluation Report (*pp. 60*) also states that:

> The evaluation team could not confirm that high quality research and analysis was available to support broad based decision-making at the College. The evaluation team was not able to confirm that resource planning and allocation are integrated with student learning outcomes assessment evaluation across all areas of the institution.

Several years ago, the College reassigned a faculty member into a coordinator role, designed to promote and support college-wide Institutional Effectiveness & Assessment. This coordinator has served in a multitude of roles for the College, including previous service as the Curriculum chair as well as current service as the Accreditation Liaison Officer and committee chair for the TLC.[6, 15] In addition, the College has since increased its research capacity by hiring a Research Analyst as of fall 2014, designated to further support student equity. This researcher will be disaggregating and analyzing outcomes data and achievement for subpopulations of students, identifying any potential performance gaps, and suggesting implementation strategies to mitigate those gaps as well as evaluating the efficacy of those strategies (new 2014 Accreditation Standard I.B.6) as part of his job duties.

Therefore, the College requests that the references to the College not fully meeting the Standard (*pp. 56, 60*) be removed.

Thank you for the opportunity to provide this information to the Commission. As Santa Ana College prepares for its centennial celebration in 2015, we are grateful for the recent External Team visit in our ongoing efforts to support and promote sustainable, continuous quality improvement across the institution's educational programs and services. The College is committed to working through accurately identified challenges in our collective efforts to best serve our students and the community.

Sincerely,

Erlinda J. Martinez, Ed.D.

References

[1] www.sac.edu/program_review

[2] Modern Language: http://www.sac.edu/Program_Review/HSS/ModernLang/Pages/default.aspx
Kinesiology: http://www.sac.edu/Program_Review/Kinesiology/KIA/Program%20Level%20SLO%20Assessment%20Program%20Level%20SLO%20Ass/KinesiologyIA_Program-SLO-F13.pdf
Music: http://www.sac.edu/Program_Review/FPA/Music/Pages/default.aspx
Accounting: http://www.sac.edu/Program_Review/Business/Accounting/Pages/default.aspx
Human Development: http://www.sac.edu/Program_Review/HST/HumanDev/Pages/default.aspx
Math: http://www.sac.edu/Program_Review/ScienceMath/Math/Pages/default.aspx
Nursing: http://www.sac.edu/Program_Review/ScienceMath/Nursing/Pages/default.aspx
Geography: http://sac.edu/Program_Review/HSS/Geography/Pages/default.aspx

[3] TLC End-of-Year Report 2014: http://www.sac.edu/committees/TLC/Documents/TLC_End-of-Year_Report_05-29-14_bnj_.pdf
TLC aggregate report 2013: http://www.sac.edu/committees/TLC/Documents/2012-2013/TLCMinutes05-06-13_Agenda05-20-13.pdf
TLC End-of-Year Report 2012: http://www.sac.edu/committees/TLC/Documents/2012-2013/TLC-End-of-Year-Report05-15-12.pdf

[4] Modern Languages: Analysis of data at the program level.
http://www.sac.edu/Program_Review/HSS/ModernLang/Program%20Level%20SLO%20Assessment/ModernLanguages_PLO_Program_Assessment_S14.pdf
Chemistry—Capstone PA/PR Program Review Report.
http://www.sac.edu/Program_Review/ScienceMath/Chem/Annual%20Planning%20Portfolio%20and%20Quadrennial%2019QT%20Cap/Chemistry_AnnualPAPR_S14.pdf
Communication Studies Course-level SLO Review of data.
http://www.sac.edu/Program_Review/FPA/CMST/Course%20Level%20SLO%20Assessment/Course%20SLO%20Assessment%20Fall%202013-Spring%202014/SLO%20Assessment%20Report%20for%20CMST%20097%20Fall%202013%20SLO%203.pdf
Student Services-Admissions and Records Program Effectiveness Review.
http://www.sac.edu/Program_Review/Documents/Student%20Services/Admissions_Records_and_Graduation_1314_Portfolio.pdf
Administrative Services Unit Review.
http://www.sac.edu/Program_Review/Documents/Administrative%20Services/Area%20Plan_with%20eval%20form%20FY%2013-14%20Final.pdf
Humanities and Social Sciences Resource Allocation Request based on department program review and dialogue with chairs.
http://www.sac.edu/Program_Review/HSS/Resource%20Allocation%20Requests/SAC%20Resource%20Allocation%20Request%20form%20FY%2014-15_HSS.pdf

[5]FY 2014-15 College-wide Resource Allocation Requests for Academic Affairs:
http://www.sac.edu/AdminServices/budget/Documents/COMPILED%20ACADEMIC%20AFFAIRS%20RAR%20-By%20Type%20FY%202014-15.pdf
FY 2013-14 College-wide Resource Allocation Requests for Academic Affairs:
http://www.sac.edu/AdminServices/budget/Documents/Academic%20Affair%20RAR%20compiled%20by%20TYPE.pdf
FY 2014-15 College-wide Resource Allocation Requests for Administrative Services:
http://www.sac.edu/AdminServices/budget/Documents/COMPILED%20Admin%20Services%20RAR-By%20Type%20FY%2014-15.pdf
FY 2013-14 College-wide Resource Allocation Requests for Administrative Services:
http://www.sac.edu/AdminServices/budget/Documents/Administrative%20Services%20RAR%20Compiled%20by%20Type.pdf
FY 2014-15 College-wide Resource Allocation Requests for Continuing Education:
http://www.sac.edu/AdminServices/budget/Documents/COMPILED-SCE%20RAR%20By%20Type%202014-15.pdf
FY 2013-14 College-wide Resource Allocation Requests for Continuing Education:
http://www.sac.edu/AdminServices/budget/Documents/School%20of%20Continuing%20Ed%20RAR%20Compiled%20by%20type.pdf
FY 2014-15 College-wide Resource Allocation Requests for Student Services:
http://www.sac.edu/AdminServices/budget/Documents/COMPILED%20STUDENT%20SERVICES%20RAR%20-By%20Type%20FY%202014-15.pdf
FY 2013-14 College-wide Resource Allocation Requests for Student Services:
http://www.sac.edu/AdminServices/budget/Documents/Student%20Services%20RAR%20Compiled%20by%20Type.pdf

[6]http://www.sac.edu/committees/TLC/Pages/default.aspx

[7]http://www.rsccd.edu/Departments/Research/Documents/InternalResearchReports2002-2013.pdf

[8]http://www.rsccd.edu/Departments/Research/Pages/Student-Retention,-Persistence-and-Performance.aspx

[9]http://www.sac.edu/Program_Review/FPA/Library/Annual%20Planning%20Portfolio%20and%20Quadrennial%2019QT%20Cap/Library-QuadCapstone-F13.pdf

[10]http://www.sac.edu/committees/IEA/Documents/SAC%20Institutional%20Effectiveness%20Survey%20Responses%20Fall%202013%20updated%2012%2005%2013.pdf

[11]http://www.sac.edu/AdminServices/budget/Documents/AAASAC%20RESOURCE%20ALLOCATION%20REQUEST%20PROCEDURES%20FY%202014-15%20.pdf

[12]http://www.sac.edu/AdminServices/budget/Documents/P%20and%20B%20APPRVD%20committee%20goals%20for%20FY%2013_14.pdf

[13]http://www.rsccd.edu/Departments/Research/Documents/DistrictPlanning/2013_2016RSCCD
AdministrativeServicesportfolios.pdf

[14]http://www.rsccd.edu/Departments/Research/Documents/DistrictPlanning/2011_2013DOPlann
ingPortfolios063013.pdf

[15]http://www.sac.edu/Accreditation/Pages/default.aspx