November 19, 2018

Northwest Commission on Colleges and Universities
Bylaws, Standards, and Policies Committee
8060 165th Avenue NE
Suite 100
Redmond, WA 98052

To the NWCCU Bylaws, Standards, and Policies Committee:

The Orbis Cascade Alliance is pleased to have the opportunity to provide feedback in support of NWCCU's comprehensive review of its Standards of Accreditation, Policies, and Eligibility Requirements. As a 38-member academic library consortium, with members in Washington, Oregon, and Idaho that spans community colleges, private colleges and universities, and large and small public universities, the Alliance is uniquely suited to address (a) the spirit and intent of the library-related Standards of Accreditation, and (b) the ways in which the Standards can best ensure that a diverse set of institutions provides appropriate library and information services for their students and faculty. The Alliance shares NWCCU's commitment to continuous improvement of institutional quality and appreciates NWCCU's consideration of our feedback.

The NWCCU Standards of Accreditation and accompanying evaluative process focus on the ways in which institutions—through their uniquely expressed missions—support and demonstrate student learning and success. As core partners in the teaching, learning, and research missions of colleges and universities, academic libraries are vital to student learning and success. Recent research indicates that student engagement with library information resources and services is correlated with improvements in academic performance and with student persistence and retention.[1]

The current NWCCU Standards and evaluative process recognize the critical importance of libraries' role through dedicated standards and the participation of professional library evaluators. The Alliance strongly encourages NWCCU to maintain this approach in any revised Standards or process to ensure that library collections, instruction, and services adequately support teaching, learning, and research at our institutions. More specifically, we recommend that the library standards and participation of library evaluators remain part of the comprehensive review of institutional quality, rather than converted to an off-site supplementary review of

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[1] Association of College and Research Libraries. "Academic Library Impact on Student Learning and Success: Findings from Assessment in Action Team Projects." Prepared by Karen Brown with contributions by Kara J. Malenfant. Chicago: Association of College and Research Libraries, 2017; Joni Blake, Melissa Bowles-Terry, Shirlene Pearson, and Zoltan Szentkiralyi, "The Impact of Information Literacy Instruction on Student Success: A Multi-Institutional Investigation and Analysis," Greater Western Library Alliance. 2017.

capacity. The Alliance is concerned[2] with the question raised in the NWCCU white paper as to whether issues related to library resources should be separated from comprehensive discussions of institutional quality. As reflected in the current standards, especially 2.C.6 and 2.E.3, the effective use of information resources is a core component and competency of quality academic programs. Similarly, standard 2.E.1 demonstrates how library collections cannot be assessed without examining an institution's curriculum, and vice versa. Isolating consideration of library and information resources as solely a matter of capacity would substantially weaken the review of institutional quality.

The important role of library evaluators in the comprehensive review of institutional quality is also reflected in the professional values, knowledge, and competencies that librarians bring to bear on standards beyond those devoted to library and information resources. Academic librarians, through our mandate to partner with and support all disciplines and academic programs, are well-positioned to evaluate, and contribute to, institutions' performance in areas that reach across programmatic boundaries. If, as suggested in the NWCCU white paper, the Standards are revised to focus on common student outcomes like critical thinking and ethics, libraries would be natural leaders in this area—and we recommend that information literacy (currently addressed in 2.E.3) be considered as one of the critical shared student outcomes that every institution should address. Beyond information literacy, there are two additional areas in which libraries' knowledge and institutional leadership can help shape the Standards and evaluation: copyright and student privacy. As indicated in the recommendations included below, there is room for improvement in the treatment of these topics in the Standards. Librarians, as interdisciplinary academic professionals with deep knowledge and concern in these areas, are well-equipped to contribute to shared standards and practices in these areas and to help strengthen the rigor of NWCCU review.

In order to provide NWCCU with actionable feedback related to the integration of libraries in the Standards and evaluative process, the Alliance would like to offer specific recommendations related to the revision and expansion of the current standards:

- First, while retaining the existing standards related to library and information resources is critical for supporting both institutional quality and student learning, some of these standards can, and should, be revised to better reflect current professional practice within academic librarianship (as further detailed below).

- Second, standards related to intellectual property and the privacy of student data should be revised and expanded to reflect best practices in higher education that support academic program quality, student learning, and student privacy rights.

Specific standards are listed below, with proposed revisions indicated and accompanying rationales for the revisions included. Recommended revisions are indicated in **boldface type**.

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[2] Question posed in white paper: *Should federal compliance items and capacity issues (library resources, infrastructure, and policies) be separated into an offsite review or separate report and the comprehensive report be more focused on institutional quality?*

Proposed revisions to selected current library standards, with accompanying rationales:

2.E.1 Consistent with its mission and core themes, the institution holds or provides access to library and information resources in suitable formats, with an appropriate level of currency, depth, and breadth, to support the institution's ~~mission, core themes,~~ **academic programs, co-curricular and/or scholarly activities**, and services, wherever ~~offered~~ and however **such programs and activities are offered.**~~delivered.~~

> *Rationale:* This removes redundancy in phrasing related to mission/core themes and focuses on support for teaching/learning in various settings ("academic programs", "co-curricular and/or scholarly activities").

2.E.2 Planning for library and information resources is **led by well-qualified library and information resources faculty and/or staff, and is** guided by **best practices in library and information science as well as local** data that includes **academic program assessment and** feedback from affected **library** users ~~and appropriate library and information resources faculty, staff, and administrators.~~

> *Rationale:* This provides greater specificity as to the general considerations that should guide planning for library and information resources, in line with accepted best practice in academic librarianship. Feedback from affected users is only one component of the comprehensive planning process that is required for the delivery of quality resources and services.

2.E.3 Consistent with its mission and core themes, the institution provides ~~appropriate~~ instruction and **services that equip** students, faculty, staff, ~~administrators,~~ and others (as appropriate) **to be** ~~to enhance their~~ **effective users of library and other information resources and critical, ethical consumers and creators of knowledge.** ~~efficiency and effectiveness in obtaining, evaluating, and using library and information resources that support its programs and services, wherever offered and however delivered.~~

> *Rationale:* The proposed revision is more closely aligned with a holistic view of the necessary competencies that information literate individuals should possess, and specifically introduces the ethical dimensions of information use and the role of students and faculty as knowledge creators. The revision also positions information literacy as a necessary outcome in and of itself, not as something that only has value insofar as it supports the programs and services of the institution.

2.E.4 The institution regularly and systematically evaluates the quality, adequacy, utilization, ~~and security~~ **effectiveness, and responsiveness** of library and information resources, services**, and facilities,** including those provided through cooperative arrangements, **in relation to the institution's mission and academic programs. The institution's ongoing assessment incorporates the experiences and outcomes of those who use library and information resources, services, and facilities.**

Rationale: Assessment of the value and impact of library and information resources and services is shifting away from a primary focus on descriptive statistics (e.g. volume counts, resource usage, visit counts, etc.) towards a more qualitative evaluation of how well these resources and services meet the unique teaching and learning needs of faculty and students across diverse programs and the impact of the library on student learning outcomes and student success.

Proposed amendments to non-library standards, with accompanying rationales:

2.A.15 Policies and procedures regarding students' rights and responsibilities, including academic honesty, appeals, grievances, ~~and~~ accommodations for persons with disabilities, **and privacy and uses of student data** are clearly stated, readily available, and administered in a fair and consistent manner.

2.A.XX **The institution publishes and adheres to a clearly defined policy with respect to the collection, access, use, and control of student data. It ensures that use of student data to improve learning, support services, retention, and other institutional outcomes is transparent and consistent with applicable legal requirements.**

> *Rationale:* The NWCCU white paper poses the question of whether "consumer protection should be imbedded in the Standards." This is a timely question as greater numbers of institutions are turning to student data of all types (education records, facility use, counseling records, library use records, et al.) to create predictive models for risk assessment and student retention. While there are legitimate administrative and educational uses of this student data that are intended to improve student outcomes, persistence, and retention, institutional practices vary with regard to the extent to which students are made aware of how their data is being used to monitor and analyze them and inform efforts like intrusive advising. Ensuring that students are aware of how information about them is being used, and have the opportunity to, as appropriate, opt out of such uses, is critical to ethical institutional practice. The proposed revision to 2.A.15 and the proposed new standard in 2.A attempt to address this issue. As NWCCU considers "what data should be collected to support ongoing monitoring and engagement to assure transparency, institutional success, and student success," it is important concurrently to consider how this should be done in a manner that is ethical, confidential, and transparent.

2.A.24 The institution maintains clearly defined policies with respect to ownership, copyright, control, compensation, and revenue derived from the creation and production of intellectual property. **It provides accompanying education to faculty, staff, administrators, and students regarding their rights and responsibilities in the creation and use of intellectual property, and affirms the importance of the fair use of copyrighted materials in advancing teaching, learning, and research.**

> *Rationale:* Institutions should have a comprehensive approach to intellectual property that both encourages legal and ethical behavior and supports the appropriate use of intellectual property to further the educational aims of the institution. To that end,

policies should be accompanied by an educational program for students, faculty, and institutional personnel. A critical component of this program should be guidance in how best to incorporate the fair use of copyrighted materials in teaching and learning. Lack of knowledge of fair use can both increase institutional risk and also create unnecessary limits on potentially beneficial use of copyrighted materials to enhance teaching and learning.

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, **cultivation, curation,** and dissemination of knowledge. It affirms the freedom of faculty, staff, administrators, and students to share their scholarship and reasoned conclusions with others, **as well as the importance of providing access to diverse information resources to inform those conclusions.** 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.

> *Rationale:* An important prerequisite of the ability and freedom to form and express diverse perspectives is access to diverse information resources. It is vital that as institutions support academic freedom, this support extends to the ability of the library to invest in, curate, and provide access to information resources that reflect a wide range of thought. While library collection development policies provide one measure of support for this practice, institutional support for the library's freedom in this regard is critical.

The Alliance appreciates the willingness of NWCCU to accept public feedback as part of the review of the NWCCU Standards and process, and acknowledge the complexity of balancing the needs and opinions of diverse stakeholders. We welcome questions or requests for clarification in response to our comments.

The Board of Directors, on behalf of the Orbis Cascade Alliance,

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