



March 22, 2019

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 would like to register significant concern with the proposed revisions to the NWCCU Standards of Accreditation on behalf of its 38 member institutions, which include community colleges, private colleges and universities, and large and small public universities in Washington, Oregon, and Idaho. The Alliance would like to propose alternative revisions to ensure a rigorous evaluative process consistent with the Commission's goals.

The current Standards recognize libraries' central role in the teaching, learning, and research missions of their institutions through standards that reflect the importance of both information resources *and* qualified library personnel in supporting student learning and success. While we appreciate the Commission's objective of "simplify[ing] language and requirements" in the proposed Standards revision, reducing the library-related standards to solely a consideration of available information resources runs counter to the Commission's goal "to create Standards[...] that place student learning and student achievement at the forefront." Solely providing information resources without ensuring that there are qualified library professionals to select, curate, and guide students in the effective use of those resources would constitute poor stewardship of institutional financial resources and would hinder student learning and success. Academic librarians are trained to select appropriate resources for an institution's academic programs, and to teach students across all programs the skills needed to effectively navigate a complex information ecosystem in support of academic success. Every college or university library should be expected to provide not only information resources, but also instruction in how best to use those resources.

After consultation with its NWCCU-accredited member institutions, the Alliance proposes the following proposed revision of the draft library criterion:

Library and Information Services

2.G.1 The institution holds or provides access to adequate library and information resources appropriate to its curriculum and mission, and employs sufficient qualified staff to provide the services and support necessary to fulfill the institution's mission and ensure academic program quality and integrity.

The Alliance requests that NWCCU adopt this revision to ensure that library collections, personnel, and services adequately support teaching, learning, and research at our institutions. Maintaining the current draft language limits consideration of library services solely to the provision of information resources, thereby substantially weakening the Standards' support for student learning and the Commission's efforts to ensure institutional quality.

Recognizing the necessity of a productive evaluation process, the Alliance strongly recommends that NWCCU continue to include library evaluators in the comprehensive review of institutional quality. External library evaluators are uniquely qualified to evaluate the quality and effectiveness of library resources and instructional programs. Additionally, through libraries' mandate to partner with all disciplines and academic programs, academic librarians are well-positioned to contribute to the evaluation of institutional quality in areas that reach across programmatic boundaries.

The Alliance appreciates NWCCU's willingness to accept public feedback as part of the review of the NWCCU Standards and process. 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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Clackamas Community College
Clark College
Concordia University
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George Fox University
Lane Community College
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