



Middle States Commission on Higher Education

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October 10, 2009

TO: Prof. Trinidad Fernandez–Miranda, Interim Academic Dean
Prof. Anaïs Malinow, Self–Study Chair
University of Puerto Rico – Carolina

FROM: Linda Suskie, Vice President

SUBJECT: **FOLLOW–UP TO OCTOBER 9, 2009, SELF–STUDY PREPARATION VISIT**

I write to thank you for your warm, gracious hospitality during my visit to UPRCA on Friday, October 9, 2009. I am also writing to summarize some of the key points discussed during my visit. For the record, I note that my visit included meetings with:

- Interim Chancellor Trinidad Fernandez–Miranda and other campus leaders
- Representative faculty, administrators, and students (about 25 total)
- UPR Trustee Rosa Franqui, a faculty representative member of the UPR Board of Trustees
- Self–Study Steering Committee and Institutional Assessment Committee
- Executive Steering Committee

My visit also included a sumptuous lunch beautifully prepared and served by students of the School of Hotel and Restaurant Administration.

I opened most of my meetings by emphasizing that the Middle States self–study and reaccreditation process is for UPRCA and its students. It is intended to help the entire UPRCA community identify ways to make UPRCA even better than it already is. The process is *not* to serve or support the agenda of any individual, group, political party, or other interest.

It is thus vital that the president, board, and chancellor not interfere with the self–study and reaccreditation process, because doing so would affect the process’s integrity and raise questions about UPRCA’s compliance with our integrity standard. It is similarly vital that the UPRCA community participate actively in the self–study process and *not* view participation as a political statement of any kind.

Because the self-study is getting off to a late start, it is particularly vital that the self-study chair, executive committee, steering committee, and work groups stay intact and not be replaced. Replacing anyone who has been working on the self-study would lead to significant delays in moving ahead with the process, with a poor self-study undoubtedly the result.

The self-study should, instead, represent an open, balanced analysis of the institution. It should represent consensus as much as possible. Where there is disagreement, the self-study should acknowledge differing interpretations and recommendations. It should also be balanced in celebrating UPRCA's many strengths and successes along with discussing and analyzing areas of concern.

At each meeting, I explained that, while I am not visiting as a reviewer and I have not had an opportunity to systematically review information regarding UPRCA, recent developments raise troubling questions about UPRCA's compliance with several of the Commission's standards and requirements. While I cannot predict the conclusions, recommendations, and actions of the Commission and its evaluation team, I am seeing the Commission enforce its requirements and standards with increasing rigor. I thus feel obliged to share my concerns with you, so that the UPRCA community can take whatever steps it decides are appropriate to address them and prepare for a successful evaluation team visit in Spring 2011.

- **Requirement of Affiliation 2** states, "The institution is able to provide written documentation that it is authorized to operate as an educational institution and award postsecondary degrees by an appropriate governmental organization within the Middle States region." There are reports that the governor plans to dismantle CES, assuming (incorrectly) that Middle States accreditation is sufficient to obtain Title IV funds. But without licensure by CES or other appropriate Puerto Rican government entity, all Puerto Rican institutions accredited by Middle States will lose their Middle States accreditation and, consequently, Title IV funds.
- **Standard 4 (Leadership and Governance)** states in part that "The governance structure includes an active governing body with sufficient autonomy to assure institutional integrity." Recent actions of the UPR Board of Trustees leading to the abrupt departure of numerous UPR senior administrators, including several at UPRCA, raise questions about its autonomy, including its capacity to be free of undue political influence. I am attaching three documents I gave to Trustee

Franqui: a new statement by AGB and CHEA on board involvement in accreditation, an article by Derek Bok on board involvement with assessment and academic quality, and a draft of a new MSCHE publication on the Commission's expectations for governing boards.

- **Standard 5 (Administration)** states in part that “The institution’s administrative structure and services facilitate learning and research/scholarship, foster quality improvement, and support the institution’s organization and governance.” One of its fundamental elements states that an accredited institution is characterized by “Qualified staffing appropriate to the goals, type, size, and complexity of the institution.” Anyone who comes into a new position at a college, even if he or she has worked there in another position, cannot immediately continue the work of his or her predecessor. Time must be spent “learning the ropes,” and initiatives and activities underway must be temporarily put on hold. Periodic turnover among positions is not unusual or a difficulty, but the abrupt, wholesale turnover of virtually every significant leadership position, including most deans, vice presidents, and unit heads, means that the institution has lost an important body of experience and expertise, and many efforts to advance and support the institution must temporarily cease.

While I understand that local culture prompts resignations when a colleague departs, it is appropriate to question whether this practice is in the best interests of UPRCA and its students. Which is more important: supporting a departing colleague or ensuring, through smoother transitions, continuity in plans, improvements, and initiatives that benefit UPRCA and its students?

- **Standard 6 (Integrity)** has a fundamental element stating that an accredited institution is characterized by “Fair and impartial practices in the hiring, evaluation and dismissal of employees.” The abrupt removal of key UPR leadership—which affects UPRCA—raises questions about compliance with this aspect of this standard.

The draft self-study design is very good! Indeed, it is the best one I have reviewed this year. It is exceptionally complete and well-written. I particularly complement its creative organization and the broad-based composition of the steering committee and work groups. Another strength is the linking of the self-study design to the goals and objectives of the strategic plan.

I offered the following suggestions to the Steering Committee to strengthen the self-study further, along with other minor suggestions:

- The chancellor and deans should not be on the steering committee. The self-study's recommendations will be directed primarily to them as UPRCA's leaders, and making recommendations to oneself might be perceived as a conflict of interest.
- Give each work group a standing charge to document compliance with its standard. I am attaching a template that the work groups might find valuable in this regard.
- The design may have too many research questions to be tackled by the work groups in the remainder of this academic year. Consider whether they need to be refined to a more manageable number. Some questions are rather specific and might be subsumed within other questions. Also, some questions are charged to more than one group. You may want to consider giving just one group primary responsibility for examining them.
- The self-study should examine UPRCA as a whole. It should not evaluate any particular group, office, or individuals such as CIAAP, the Chancellor, "the administration," or "deans and other academic administrators." Questions referencing these individuals and groups should be edited so they refer to UPRCA instead.
- Consider ways to involve students in the self-study, especially students studying related subjects who might find this a valuable experience.
- Consider adding a communications plan to the design to keep the UPRCA community informed about and involved with the self-study process.
- Use the self-study process as an opportunity to learn what other public colleges are doing about issues that concern you. UPRCA should not aim to emulate other colleges, of course, but there are many good things happening that you might adapt. Explore the many useful—and free—online resources that can inform discussions.
- As you establish expectations for group reports, keep in mind that the entire self-study should be no longer than 100 single-spaced pages (or 200 double-spaced).
- Include budget documents and governance documents (bylaws, minutes, etc.) in the document inventory.
- As you consider the self-study schedule from this point forward, keep in mind that the typical schedule is as follows:
 - Work groups spend the rest of this academic year conducting research, reviewing and analyzing their findings, and writing their reports.

- The work group reports are edited into an initial self-study draft over the summer.
- The steering committee and the UPRCA community review and offer comments on the draft in Fall 2010, with the self-study edited accordingly.
- The governing body endorses the self-study toward the end of 2010.
- The self-study is finalized and sent to the team in early 2011.

You do not need to conform to this schedule, but you may want your calendar to be informed by it. You'll also need to allow time for translating the self-study and key documents.

The evaluation team will consist of 6–7 members, including the team chair, a finance person, an assessment person, an academic with a background in the liberal arts/general education, and an academic with a background in one of UPRCA's professional offerings (perhaps not hospitality because it is separately accredited). I understand that you would like the sixth team member to be another academic. Probably two members of the team will not have previous evaluation team experience. I will do my best to ensure that at least one team member will be Spanish-speaking and that the team includes people from UPRCA's peers, people from Hispanic-serving institutions, and people who bring diversity.

I did not have an opportunity to review UPRCA's recent monitoring report to the Commission on assessment, but I will do so as soon as possible and let you know of any areas of concern. I am attaching to this memo MSCHE's brochure on our assessment expectations and a rubric that you can use to assess where UPRCA is in terms of compliance with Standard 14 (Assessment of Student Learning).

The Executive Steering Committee and I agreed that UPRCA will submit an updated self-study to me no later than **November 1, 2009**. I will respond in no more than two weeks of receipt with a formal approval of the design.

Please ensure that I am kept informed of any significant changes at UPRCA, including any changes in institutional leadership or contact information. Please also contact me if anything in this memorandum is incorrect or does not match your understanding or if you have any questions. It was a great pleasure to meet you all, and I am looking forward to continuing to work with you over the coming months.