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REGIONAL ACCREDITATION AND LEARNING OUTCOMES ASSESSMENT:
MAPPING THE TERRITORY

BY

STACI J. PROVEZIS

DISSERTATION

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Doctoral Committee:

Assistant Professor Timothy R. Cain, Chair
Regent Professor Stanley O. Ikenberry, Director of Research
Professor Liora Bressler
Assistant Professor Lorenzo Baber

Abstract

This case study examined the intersection of collegiate-level student learning outcomes assessment with regional accreditation to understand how regional accreditation policies and practices leverage student learning outcomes efforts on US college campuses. To that end, the standards of each of the regional accreditation agencies were carefully reviewed and representatives from the regional accreditation agencies (with the exception of NWCCU) were interviewed. In addition, data was gathered from a Council for Regional Accreditation Commissions (C-RAC) and National Institute for Learning Outcomes Assessment (NILOA) Symposium on student learning outcomes assessment, in October 2009. The information gathered from the documents, interviews, and the symposium were reviewed and analyzed for emergent themes. These themes reveal similarities and differences between the accreditors, primarily in their stated expectations for defining, assessing, and using outcomes; for prescribing practices; for transparency; for faculty engagement; for accreditation follow-ups; and for student learning outcomes assessment resources.

It is the contention of this study that learning outcomes assessment is janus-faced in its dual emphasis on improvement and accountability, and that these two concerns remain in irresolvable tension within the accreditation process. The regional accreditation agencies are in many ways more similar than different in regards to their expectations for learning outcomes assessment. Even so, they have their own “habitus” or set of practices that are influenced by the region. Their involvement in C-RAC and their adherence to the Principles set forth by this organization helps structure the field, so the logic of accreditation practice is the result of regions sharing and discussing strategies, making these strategies transferrable--or transposable.

To my soul mate, Jad

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List of Acronyms

Council for Higher Education Accreditation (CHEA)

Council of Regional Accrediting Commissions (C-RAC)

Middle States Commission on Higher Education (MSCHE)

New England Association of Schools and Colleges Commission on Institutions of Higher Education (NEASC-CIHE)

North Central Association of Colleges and Schools The Higher Learning Commission (NCA-HLC)

Northwest Commission on Colleges and Universities (NWCCU)

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges (WASC-ACCJC)

Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC-ACSCU)

Chapter One

Overview of the Study

Statement of the Problem

In the mid-1980s, several published reports on K-12 and post-secondary education in the United States focused on concerns about learning and the need to create an intelligent workforce for the 21st Century K-12 and post-secondary education in the United States—*A Nation at Risk*, 1983; *Involvement in Learning*, 1984; *Integrity in the College Curriculum*, 1985; and *Time for Results*, 1986 (Ewell, 1993, 2001). At about the same time, states (such as Virginia, South Carolina, Missouri, and Colorado) and accreditation agencies (such as the Southern Association of Colleges and Schools) started to ask what institutions were doing to assess student learning. Finding out what students gain from a college education and how institutions use this information to improve upon programs and the educational enterprises became a key concern both internally to colleges and universities and externally to various stakeholders.

In addition to the aforementioned reports and interested stakeholders or possibly because of them, the American Association for Higher Education (AAHE) held the first national conference on the topic of assessment, in 1985 (Miller, 2006). By offering a platform for discussing assessment in a systematic way with a shared language and methodology, this meeting helped legitimate and launch the modern collegiate learning assessment movement (Miller, 2006; Ewell 2002), which call for “colleges and universities to assess the impact of their degree programs on students” (Hunt, 1990, p. 5). Institutions began to use a variety of measures to assess students through indirect means such as retention and graduation rates, job placement rates, and surveys or through direct means such as tests, capstone experiences, and portfolios.

The assessment types chosen were both formative, allowing for the student to receive information and improve, and summative, occurring at the end of the student's experience. Regardless of how assessment is carried out, institutional priorities and missions usually direct the assessment approach taken and the way that the information is used. When assessment is used for improvement, for instance, an institution may change a curriculum to account for deficiencies that students may have on the assessments.

While assessment was taking place from the late 1970s through the mid 1980s, the focus was "decentralized and institution-based," which left room for evaluation of programs for improvement (Ruppert, 1994, p. 2). The assessment that began in the mid-1980s and continued through the early 1990s shifted to address state concerns with higher education, which focused more on accountability and performance indicators (Ewell, 1993). Ewell and Jones (1994) explain the impetus for using statistical "indicators as policy tools in higher education" beginning in the early 1990s as the result of several factors converging: shrinking state resources, increasing enrollments in higher education, mounting global competition and escalating demands for stronger skill sets and a college degree to be competitive in the marketplace, and stricter monitoring of the quality of undergraduate education. These indicators were used to support higher education in meeting its goals for improvement. However, at the same time, the indicators often focused more on the information gathering and short term solutions rather than significant change. This shift to accountability allowed policy makers to gain a better understanding of how public resources were being used (Ruppert, 1994; Miller, 2006). While some universities began establishing a culture of evidence at this time, the regional accrediting organizations, eager to change their approach to accreditation, were becoming "rooted in the assessment of student learning outcomes" (Ewell, 2009a, p. 3), a move which would make assessment a requirement

for all accredited institutions. At the very least, in the early to mid-1990s, each accredited institution in the United States was required to list its learning outcomes.

The learning outcomes assessment movement was further nudged along by national reports and federal policy initiatives such as *Measuring UP, The State-By-State Report Card for Higher Education* (2000), the report commissioned by the recent past Secretary of Education Margaret Spellings, *A Test of Leadership: Charging the Future of U.S. Higher Education* (2006), [commonly called the Spellings' Report] and the Reauthorization of the Higher Education Acts (HEA) in 1998 and 2008. In particular, the Spellings' Report and the 2008 HEA both called for stronger assessments of students learning outcomes and requested that regional accrediting commissions focus even more sharply on learning outcomes assessment in the accreditation process.

In addition to increased expectations for student learning outcomes assessment, institutions continue to be asked for more transparency—to show publicly what students learn or what level of knowledge students gain through their college educations. In this current climate, transcripts, graduation rates, alumni surveys, and such are all important but not sufficient in the eyes of critics. Advocates of assessment call for information documenting learning gains, for standardized test scores allowing for comparability between and among institutions, and, possibly, even for a national standard processed through accreditation. Given the complex nature of the American higher education system and the vast institutional diversity, such comparability becomes a very difficult task and the utility of such comparisons remains an open question.

In response to these varied pressures, national higher education association leaders proposed increasing transparency on a broad range of indicators, including learning outcomes assessment data. Some examples of transparency initiatives are 1) The College Portrait, part of

the Voluntary System of Accountability (VSA) designed and launched by Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU); 2) the University and College Accountability Network (U-CAN) developed by the National Association of Independent Colleges and Universities (NAICU); and 3) the Valid Assessment of Learning in Undergraduate Education (VALUE) sponsored by the American Association of Colleges and Universities (AAC&U). These and other initiatives continue to shape the approaches of institutions as they respond to the broader challenges of learning outcomes assessment.

Accreditation agencies have been urged to expect institutions to require and show publicly student learning assessments. These agencies in the United States can be divided into four types, as defined by the Council for Higher Education Accreditation (CHEA):

1. Regional accreditors—accredit public and private, mainly non-profit and degree granting, two-and four- year institutions.
2. National faith-related accreditors—accredit religiously affiliated and doctrinally based institutions, mainly non-profit and degree granting.
3. National career-related accreditors—accredit mainly for-profit, career-based, single purpose institutions, both degree and non-degree.
4. Programmatic/Specialized accreditors—accredit specific programs, professions, and free-standing schools such as law, medicine, engineering, and the health professions. (Eaton, 2009, p. 80)

The accreditors certify that institutions of higher education provide a standard of excellence that has been agreed upon by the accrediting associations. This process legitimates institutions and, in the case of regional accreditation and national career-related accreditation, provides “stamps of approval” allowing institutions to receive federal funding. While the process is voluntary, very few institutions could operate without the federal funds that are tied to

accreditation. Therefore, the changes made by accreditors in regard to student learning outcomes assessment could significantly impact higher education as a whole.

Seven regional accreditation organizations accredit higher education institutions in the United States and, in limited instances, outside the United States. These accreditation agencies are membership organizations to which each accredited institution belongs. Thus, accreditation is a self-regulating function for higher education institutions and the standards that accreditors use to evaluate institutions are voted on by the members. In the mid-1930s, regional accreditation shifted from largely quantitative evaluations of institutions that basically focused on such institutional facts as the number of students or the number of books in the library to evaluations that focused on institutional mission. In fact, beginning in 1934, accreditation changed its rhetoric to include the goal of helping colleges and universities to improve (Ewell, 2009a). Starting in the 1950s, the regional accreditors first established “standards or criteria delineating the attributes and levels of performance expected of institutions and programs” (Ewell, 2009a, p. 37). This change allowed for a more comprehensive review approach. During this time, the accreditors did not have a clear notion of what was meant by quality. The learning outcomes assessment movement of the mid-1980s seemed to be the vehicle needed for accreditors to address the quality issue. As the prime mechanism for quality assurance of higher education programs in the United States, both regional and specialized accreditors began to modify their standards for accreditation in the mid-1980s. By the mid-1990s all of the regional accreditors had adopted policies on learning outcomes assessment (Ewell, 2009a). Accrediting groups, then, are considered major drivers of the movement to assess student learning and to use of assessment data to inform improvement. As evidenced by the 2009 National Institute for Learning Outcomes Assessment (NILOA) survey of provosts from accredited institutions in the U.S., which asked

how institutions use their assessment data, the top reason for using data was for institutional self-study, followed by program self-study. When asked about the factors that are prompting institutions to assess student learning outcomes assessment, again, two of the three most influential factors listed were related to accreditation with the third being institutional commitment to improvement (Kuh & Ikenberry 2009).

The link between regional accreditation and eligibility for federal student financial aid explains, at least in part, federal policy interest in accreditation and issues of quality assurance. Peter Ewell (2009a) asserts that regional accreditation serves as the primary means of quality assurance for American higher education, very likely because of the absence of a national ministry of education. As such, regional accreditation is used by the federal government as a gatekeeper to ensure that federal funds go only to legitimate colleges and universities of acceptable quality.

In short, both internal campus concerns for academic quality and institutional improvement, and external forces for accountability have contributed to the learning outcomes assessment movement within American higher education. The interested constituents for learning outcomes assessment are far reaching. External stakeholders such as policy makers, the public (students, their families, and taxpayers), employers, and professional organizations take an interest in knowing what students learn in college. Arguably, internal stakeholders, including faculties, governing boards and academic administrators have an even greater, more immediate stake.

Ewell (2009b) has written for twenty years about the tension in regards to assessment between accountability and improvement. Banta (1993), too, argues that a tension exists between internal groups and external interests. She asserts that external stakeholders are particularly

interested in accountability, while internal participants are invested in assessment for improvement. Even so, she adds both constituents are basically concerned with the same questions: “Is college helping students? Is it increasing what they know and can do?” (pp. 359-60). While institutions may collect evidence of student learning outcomes, the use of that information is radically different. Some may use it for accountability purposes only, while others integrate it into the planning and improvement processes of the institution and others still may use it for both. Banta explains that the “external audiences (governors, legislators, higher education policy makers, taxpayers) would like to be able to evaluate college outcomes by reviewing performance on a small number of key indicators” (p. 360), so as to offer information at low cost that compares students (and groups of students) across institutions. Higher education institutions, on the other hand, including academic faculties and leaders, are often skeptical that simple scores could sufficiently serve as valid and reliable indicators of what college students know and can do, which means that they do not believe they are useful as a means to improve learning or to make meaningful policy judgments (p. 360).

Shulman (2007) argues that “the challenge before us is to develop systems of assessment and accountability in which the internal uses of assessment for instruction—and the external uses of assessment for accountability and transparency—are carefully weighed” (p. 4). This study will contend that improvement and accountability are twin forces within learning outcomes assessment that, through a productive tension, shape the accreditation process. It will also argue that a clearer understanding of the ways in which regional accreditation is shaping the assessment movement is necessary to academic institutions and the public policy community, as well as the accreditation agencies themselves. The following overview provides additional information about various perspectives on the process, starting with internal perspectives and

then moving on to external perspectives, so that a more rounded view of the various stakeholders can emerge.

Internal Perspectives

Institutional. Dewey (1903) points out that in educational reform all members of the system “must have some share in the exercise of educational power” (p. 196). One expert cannot assert the changes needed even if that person is situated inside the institution. Assessment of student learning—for instance through grading—remains a central role of teaching faculty, especially at the course level, but faculty also play the central role in curriculum development at the department, program or institution-wide levels.

Especially as institutions become larger and more complex, faculty members are asked to play more diverse and sometimes competing roles as new modes of instruction are introduced; they serve to confirm that fundamental learning objectives set by faculties and institutions are being met. Through learning outcomes assessment processes college and university campuses can confirm the quality and integrity of academic programs. As Peter Ewell (1984) states,

Institutions have the greatest responsibility for assessing and valuing educational outcomes. Different institutions will, of course, have vastly different conceptions of the types of outcomes they intend to produce. Despite these differences, all have the responsibility to articulate such outcomes, to examine their success in attaining these outcomes, and to make changes in programs and services to improve their effectiveness. (p. 51)

Quite often learning outcomes assessment initiatives are channeled through the framework of regional and/or specialized accreditors, but even so regional accreditors see the institutional mission statement as the central reference point for assessment, meaning that institutions’ assessment practices should align with the mission of the institution. Banta (1993) asserts outcomes assessment has a potential to reach every student and faculty member in the United

States and, at some future point, it may make a “greater difference for students than any other single influence in the history of higher education” (p. 375). For that reason, it should “guide, support, and enrich” instruction (p. 6).

Even so, many academics dismiss the idea of student learning outcomes assessment as unnecessary and perhaps even counter-productive. This sentiment was especially true when the assessment movement began. Faculty resisted assessment due to two reasons: faculty were worried that assessment would be a tool to evaluate their performance and they were unaware of how the process worked (Driscoll, 2006). The concern for administrators has been the high cost of assessment both in regard to money and faculty time (Driscoll, 2006). The fact that assessment appeared to be externally driven fueled the distaste for it. As one author states, “external forces may have added to the resistance, but they also accelerated the momentum” for assessment to be done on campuses (Driscoll, 2006, p. 3). According to some, a shift occurred when faculty began to see the educational benefits of assessment as an examination of the learning process (Driscoll, 2006). Nonetheless, faculty involvement was listed most often by provosts, in the NILOA survey, when they were asked “what would be most helpful to effectively assess student learning outcomes?” (NILOA, 2009).

Others within the academic community may be open and interested in assessment, “but have no clear view of what might be assessed, how it might be done, how the results will be used” (Ikenberry, 2009, p.6). Again, regional accreditation organizations tend to be the practical point at which both converts and skeptics are brought together to face the practical contemporary challenge of assessing student learning outcomes and using assessment data for improvement as part of the broader approach to quality assurance in American higher education.

Regional accreditation commissions. Each of the seven regional accrediting commissions has clear expectations for student learning outcomes assessment in their standards. For example, North Central Association of Colleges and Schools the Higher Learning Commission (NCA-HLC) says that, “The organization’s goals for student learning outcomes are clearly stated for each educational program and make effective assessment possible” (NCA-HLC, 2003, p. 3.1-4). The Southern Association for Colleges and Schools (SACS) states, “The institution identifies expected outcomes . . . for its educational programs” (SACSCOC, 2008, p.25) and that “the institution demonstrates that each educational program for which academic credit is awarded . . . establishes . . . program and learning outcomes” (SACSCOC, 2008, p. 25). Further, the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (ACSCU) states that, “The institution establishes educational objectives” that “are clearly recognized throughout the institution” (WASC, 2008, p.11). Importantly, “All degrees—undergraduate and graduate—awarded by the institution are clearly defined in terms of . . . student achievement necessary for graduation that represent more than simply an accumulation of courses or credits” (p. 14). While the seven regional agencies have different sets of standards, each has stated expectations for identifying and clearly stating learning outcomes.

Beyond requiring institutions to list their learning objectives or outcomes or goals, each of the accreditation agencies also requires institutions to assess learning. For example, Middle States Commission on Higher Education (MSCHE) states in their standards that “The institution has developed and implemented an assessment process that evaluates its overall effectiveness in achieving its . . . goals” (MSCHE, 2006, p. 25). The New England Association of Schools and Colleges (NEASC) Commission on Institutions of Higher Education states, “The institution

regularly and systematically evaluates the achievement of its mission and purposes, giving primary focus to the realization of its educational objectives” (NEASC, 2005, p.4). As another example, Northwest Commission on Colleges and Universities (NWCCU) states that “The institution’s processes for assessing its educational programs are clearly defined and encompass all of its offerings” (NWCCU, 2003, p. 29). These three examples illustrate how regional accreditors discuss the assessment of learning outcomes assessment and how the institutions are given the priority to decide on their own procedures.

Regardless, the seven regional accreditation agencies’ requirements for assessment are varied and, at moments, ambiguous in regard to the types of assessment information that they require; the use of outcomes data; the issue of transparency; and the role of learning outcomes assessment in self-study reports, site visits, and accreditation actions. For this reason, this study addresses these specific variations so as to shed light on the similarities and differences of the institutional requirements across the regions.

As Stanley Ikenberry said in a keynote speech to CHEA members at their 2009 annual meeting, institutions and accreditors need to respect the self-regulation process. He states that “While American higher education jealously guards the prerogative of reaching its own judgments of academic quality; it often fails to take the responsibility seriously” (p. 10). Frequently, accreditation is seen as a compliance burden rather than an opportunity for institutional improvement. If institutions want to remain self-regulated systems that set their own parameters for quality, then those involved should not “short change” the amount of time and resources necessary for a robust accreditation experience. Accreditors are continuing to adapt their standards and the process to better fit into existing improvement initiatives—for instance, the NCA-HLC will soon begin to look at strategic plans as the self-study (Lederman, April 22,

2009). The system of accreditation appears at first to be rigid and unchanging, but in fact various changes to the system have occurred in the last century as well as in the last five years.

External Forces

Policy makers. As representatives of the public interest, policy makers play a key role in shaping student learning outcomes assessment. Miller (2006) makes a case as to why policy makers should care about learning outcomes assessment. She explains that a college-educated public contributes to a state's economy through a more productive citizenry that consumes less state assistance in unemployment or other state programs. McMahon (2009) makes a similar assertion, saying that the higher education has both private and social benefits. On a national scale, an educated public enables the United States to be more competitive in the world knowledge economy. Certain current measures such as higher education entry rates and completion rates suggest that the U.S. is starting to trail behind (Miller, 2006). She argues that “without active intervention the long-standing U.S. advantage is likely to erode at an increasingly rapid rate” (Miller, 2006, p. 7). Besides looking at the issue of student learning in college at a broad global and national level, policy makers are also attentive to the concerns of students, families, and taxpayers and others who are concerned with wise and efficient use of state and national resources. As the cost of attending college has increased, the issue of what students and their families receive for the money spent on higher education has grown more prominent.

Employers. Employers also constitute an important external voice in the learning outcomes assessment debate. Employers have an obvious need to know college graduates have certain skills upon graduation (Miller, 2006). To understand the interest of employers Peter D.

Hart Research Associates, Inc. (2009) on behalf of the Association of American Colleges and Universities (AAC&U) completed a survey, *How Should Colleges Assess and Improve Student Learning? Employers' Views on the Accountability Challenge*. The researchers surveyed 301 employers with staffs of 25 or more people, of which more than 25% have a bachelor's degree from a four-year college. The employers said that they were satisfied with the skill level and knowledge of the college graduates at the entry-level. When asked about preparedness in key areas, the employers ranked college graduates' teamwork, ethical judgment and intercultural skills the highest while they ranked critical thinking, writing, self-direction, and global knowledge the lowest. The employers stated that they do not see college transcripts as being very useful in evaluating college students. They believe that colleges need to assess students' ability to "apply their college learning to complex, real-world challenges, as well as projects or tests that integrate problem-solving, writing and analytical reasoning skills" (p. 4). This survey shows evidence that employers want to know more about what students receive from colleges.

Students. One of the most important constituents in the discussions of student learning assessment is the student population (Shulman, 2007). They are important for two reasons. First, as prospective students, they may want to select a college based on what its graduates can do rather than on the institution's "reputation, price tag," or the student's "first impression, and hunches" (Miller, 2007, p. 8). Second, as the receivers of knowledge, they would want to be able to prove that they have grown in certain ways due to their time spent in college. Embedded in this group are the students' families, who want to make sure that their students are set up to be competitive in the market, that they have gained the credentials to be successful and that the money spent has been worth the cost.

Professional Societies. Many professional societies have created licensing procedures to judge the knowledge of graduates. Miller (2006) points out that a lack of trust exists between the professional societies and colleges, which is evident in the fact that students in various fields, such as health and law, must complete exams to get the license or practice; in other words, the college degree is not perceived as indicative enough of the level of knowledge that students have obtained. The lack of consistency between what is learned at the various institutions means that there is no guarantee that a person is prepared for a certain type of job. A clear picture of learning outcomes may remedy this distrust.

In short, learning outcomes assessment on college and university campuses is being shaped by many forces and is challenged to serve multiple purposes. This study focuses on one particular segment of the learning outcomes assessment movement: the intersection of collegiate outcomes assessment and regional accreditation standards and expectations.

Significance of the Study

Many forces have converged to raise the profile of the issue of assessment of student learning outcomes on the higher education agenda. In its role as a force for quality assurance and institutional improvement, regional accreditation plays a critical place in shaping the response of American colleges and universities to the challenge of student learning outcomes assessment. Each of the seven regional accreditation groups requires some form of learning outcomes assessment as a condition of accreditation for both accountability and improvement. Institutions often link local campus efforts to assess student learning outcomes to requirements and expectations of regional or specialized accreditation. Since it appears that accreditation is driving assessment practices on campus, a better understanding of the expectations of regional

accreditors for learning outcomes assessment, the variation among regions, and the general direction of the assessment movement within regional accreditation will be useful to colleges and universities, accrediting groups and policy makers.

In the broader scheme of higher education, the lack of accessible literature on learning outcomes assessment and accreditation results in the topic being poorly understood by academics, administrative leaders, governing boards, and the public. Since both internal and external audiences have an interest in student learning outcomes assessment, this study will contribute to a better understanding both of learning outcomes assessment and regional accreditation, as well as the intersection between the two. This study addresses the lack of literature on accreditation and learning outcomes assessment; in addition, this study examines how the regional accreditors are responding to the policy and public demands for accountability, and to their traditional role of ensuring institutional improvement through the accreditation process. Because too little research-based literature exists in this area of study, this project will be useful for each of the accreditation agencies to see how their work is comparable with the others, to institutions who prepare for accreditation review, to policy makers who are interested in how accreditation is impacting the student learning outcomes assessment movement, and to scholars of higher education in the United States and abroad. The final product of this study is a case study of regional accreditation that defines its role in shaping student learning outcomes assessment.

Research Questions

Regional accreditation plays an important role in quality assurance and improvement for American higher education institutions. For more than the last decade, expectations and

requirements for learning outcomes assessment by colleges and universities as a condition of accreditation have grown. To understand this phenomenon, my study addresses the following questions:

How are regional accreditation policies and practices understood to leverage student learning outcomes assessment efforts on US college campuses?

- How do regional accreditation standards frame the requirements/expectations for learning outcomes assessment?
- What requirements/expectations do regional accreditors state for the *use* of outcomes assessment data?
- What is the expected role of faculty in the accreditation process as it relates to learning outcomes assessment?
- How do the regional accreditors specify frameworks within which learning outcomes assessment is to be addressed by institutions?
- How does learning outcomes assessment figure into site visits, team reports, and accreditors' actions and decisions?
- What resources are regional accreditors providing institutions on strategies for learning outcomes assessment?

Delimitations and Limitations

This study focuses on regional accreditation agencies as they relate to student learning outcomes assessment. Limiting the study to regional accreditation is useful because of my interest in institutional wide assessment efforts. The various professional accreditors, the national accreditors, and/or the faith-based accreditors, though each are doing interesting work, would change the scope of my study. While institutions “voluntarily” seek regional accreditation, the process is also tied to federal funding through the Higher Education Act. An institution could decide not to be regionally accredited, but it would lose the federal financial aid of students who would attend their institution, which is significant for any institution. This information is

important to note because it demonstrates the necessity for institutions to gain regional accreditation; ultimately, few will decide not to be accredited.

Due to the constraints of time, one of the main limitations of this study is that it captures only one snapshot in time of what the regional accreditors are doing in the area of student learning outcomes assessment. Much planning is being done and the landscape for accreditation may be very different in short order.

In addition, the study is limited by the degree of candor and access that the regional accreditation agencies granted to me during my visit or what is publicly available. Though I dedicated the same amount of time to each visit with the accreditors, some were more interested in my research and provided me more information than others. NWCCU was in the process of reevaluating its Standards and did not meet with me.

Moreover, this study is only one-sided, because I did not examine how the practices of the accreditors was influencing what was actually being done on the college campuses or if the assessment activities on the campuses were indeed being driven by what accreditors expected. Therefore, the study only offers the accreditors' perception that their efforts are guiding the assessment activities on college campuses.

Definition of Terms and Acronyms

Council for Higher Education Accreditation (CHEA): An association that serves over three thousand degree granting institutions and 56 institutional and programmatic accrediting organizations. CHEA serves as a national advocate for self-regulation of higher education institutions.

Council of Regional Accrediting Commissions (C-RAC): A coalition of the seven regional accreditation organizations.

Middle States Commission on Higher Education (MSCHE): This accreditation organization accredits institutions in the Middle States region of the United States including Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, the U.S. Virgin Islands, and several locations internationally.

New England Association of Schools and Colleges Commission on Institutions of Higher Education (NEASC-CIHE): This accreditation organization accredits institutions in New England including Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. In addition to the United States institutions, NEASC also accredits two institutions in Greece, three in Switzerland, and one in Bulgaria, Bermuda, and Lebanon.

North Central Association of Colleges and Schools The Higher Learning Commission (NCA-HLC): This accreditation organization typically is called the HLC and accredits institutions in the North Central region including: Arkansas, Arizona, Colorado, Iowa, Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, North Dakota, Nebraska, Ohio, Oklahoma, New Mexico, South Dakota, Wisconsin, West Virginia, and Wyoming.

Northwest Commission on Colleges and Universities (NWCCU): This accreditation organization accredits institutions from the Northwest region including: Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington.

Southern Association of Colleges and Schools Commission on Colleges (SACS): This accreditation organization accredits institutions from the Southern region including: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia and Latin America and other international sites.

Self-Study: Every institution that applies for accreditation or re-accreditation must produce a self-study, which is a report on how well the institution meets the standards for accreditation.

Standards: Each of the regional accreditation organizations provides members with Standards or a Handbook to Accreditation that includes the Standards or Criteria. These are the guidelines that universities must follow as they prepare for accreditation.

Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges (WASC-ACCJC): This accreditation organization accredits associate degree granting institutions in California, Hawaii, the Territories of Guam and American Samoa, the Commonwealth of the Northern Mariana Islands, the Republic of Palau, the Federated States of Micronesia, and the Republic of the Marshall Islands.

Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC-ACSCU): This accreditation association accredits colleges and universities offering at least a baccalaureate degree or higher in California, Hawaii, Guam and the Pacific Basin.

Chapter Two

Literature Review

The literature review concentrates on three different topics: an overview of student learning outcomes assessment, the literature on accreditation, and the two topics as they are merged together.

A Review of Student Learning Outcomes Assessment

The literature on student learning outcomes is vast in regard to opinions on or the praxis of assessment, but it is limited in actual research studies about the effects of assessment. Most of the literature surrounding learning outcomes assessment focuses on how to design an assessment program (Barak and Brier, 1990; Erwin, 1991; Courts and McInerney, 1993; Brown, Bull, & Pendlebury, 1997; Miller, Imrie, & Cox, 1998; Maki, 2004; Suskie, 2004; Walvoord, 2004; Race, Brown, & Smith, 2005). Bers (2008) agrees saying that much of the literature on assessment in higher education

is devoted to advocating the benefits of assessment, describing how assessment initiatives and programs might be organized within an institution, and identifying key attributes of successful assessment projects (leadership, resources, faculty engagement), and explaining numerous assessment approaches and measures. (p. 31)

The “how-to” guides to assessment offer limited information for a study of this scope. In some cases, though, these books contain introductions that provide information on student learning outcomes assessment beyond implementation, and, in those cases, they are included in the review. Three themes emerged from the literature: first, much of the literature speaks to the need for a clear definition of student learning outcomes assessment the term is used in different ways; second, the literature focuses on discussing the importance or significance of learning outcomes

assessment; and third, the literature often covers the history of assessment in the United States. The next section discusses these three themes.

Definition. Having a solid definition of what is being discussed is instrumental to understanding this issue as Miller, Imrie, & Cox (1998) point out saying that dictionary definitions of assessment do not refer to education, but to estimating the value for typically property (p. 4). The authors point out that assessment is not grounded in education but in business. Can we put a monetary “value” on education? If we are going to ask students to pay for the education, then many would assume that we have already established that education has a value. But how does that value translate to what students learn while in college? Several scholars have various ideas on how to define learning outcomes assessment, so it is not surprising that it has come to have many different meanings to various stakeholders. Ewell (2001) explains the necessity for a clear definition of the topic because employers, students, institutions, and policymakers define the term differently. To this end, he offers the following definition: “*student learning outcomes* should refer normally to competencies or attainment levels reached by students on completion of an academic program; if *development* or *value-added* is intended as well, this meaning should be explicitly stated” (p.7). Not unlike Ewell, others note the importance of having a collective definition, such as Wolff (1990), who explains that a broad definition of assessment needs to be embraced so that all aspects of student learning can be incorporated into the definition. This definition should be “one that includes but reaches beyond a focus on student learning and achievement to encompass the collection and analysis of evidence of effectiveness for *all* parts of an institution” (p. 9). For example, diversity, which may or may not be taught in a classroom, still should be included in what a student learns about in college. As Pascarella and Terenzini (2005) point out, some of the most meaningful interactions

that students have in college are not in the classroom, but through indirect learning. When assessing student learning, skills gained in a classroom are often easier to assess than skills gained through indirect means such as working with a faculty member or in co-curricular activities. Classroom level skills are often more measurable and can be evaluated by tests or other assignments, which are then graded. Outside the classroom experiences are often not evaluated and may be pursued by the student without much institutional direction.

Multiple perceptions about the proper focus of assessment complicate the definition of learning outcomes assessment. Miller (2003) describes the way that selecting an instrument for assessment becomes a challenge because the instruments “were developed to ferret out information that various policymakers have considered important to know about the intellectual skills and knowledge of the college educated” (p. 3). Assumptions, then, are made about what skills or level of knowledge students should garner upon completion of a program. Regardless of that, she asks, “What does it mean to earn a baccalaureate degree?” She points to qualities that have been at the root of higher education for centuries: critical thinking, communication, and problem solving. These are qualities that she says demonstrate that a person is educated and prepared for work, citizenship, and personal development—hence the qualities that should be assessed.

Focusing on how assessment in and of itself is equal to learning, Brown and Knight (1994) describe difference between formative assessment and summative assessment. The former is a “central element of learning” because it allows for a feedback loop from the instructor to the student which permits the student to learn and develop. The end-point assessment does not allow for this type of growth on part of the student because it measures the students’ achievement at the end of a course. For this reason, their definition of sound

assessment involves the “learning and development of students” which leads to student learning, and that demonstrates what the graduates of an institution have learned (pp. 12-15). It is important to note that one of the key factors in talking about assessment is understanding the unit of analysis, which can range from the individual student, to a course, a program, the curriculum, an institution, or, if one thinks globally, the American higher education system. When talking about assessment, an assumption is often made about the unit of analysis and what is being assessed. For that reason, an assessment instrument or process should be clear from the outset about the intended unit. Nonetheless, the different audiences often have different opinions of the definition of that unit. For instance, students may be interested in student-level analysis if it is about them, an employer may be interested in a program-level analysis, and policy makers may be interested in an institutional-level analysis or a system-wide analysis.

Sound assessment, according to Brown and Knight (1994), has the following characteristics:

1. clear purpose
2. allows learner to review progress
3. provides a review process
4. assesses what it claims to assess
5. appears credible
6. cost efficient
7. provides clear records of attainment
8. allows for the system to be reviewed (p. 22).

These characteristics are not so different from Banta’s (1993) three characteristics of successful implementation of assessment: one, a “shared sense of purpose” at the institution that is “clearly

articulated and communicated” in documents such as the mission and learning goals; two, an institutional culture that “implements” the above mentioned mission and learning goals; and three, a methodology for collecting the information that is respectful of the “diverse talents and ways of learning” (p. 365). In addition, Banta (2002) lists seven principles for developing effective outcome assessment:

1. having a written plan with a clear purpose that is related to goals people value;
2. having knowledgeable and effective leadership;
3. offering professional development to prepare individuals to implement assessment and use the findings;
4. sustaining an environment that is receptive, supportive, and enabling;
5. producing credible evidence of learning and organizational effectiveness;
6. providing a vehicle to demonstrate accountability to stakeholders within and outside the institution;
7. incorporating ongoing evaluation and improvement in the assessment process (p.262-263).

These seven principles build upon and become the basis for Banta’s work. In Banta, Jones, and Black (2009) these principles are developed into categories and sub categories to include the following:

- Planning Effective Assessment
- Engaging Stakeholders
- Connecting assessment to valued goals and processes
- Creating a written plan
- Timing assessment
- Building a culture of evidence
- Implementing Effective Assessment

- Providing Leadership
- Creating faculty and staff development opportunities
- Assessing processes as well as outcomes
- Communicating and using assessment findings
- Improving and Sustaining Effective Assessment
- Providing credible evidence of learning to multiple stakeholders
- Reviewing assessment reports
- Ensuring use of assessment results
- Evaluating the assessment process (pp. 1-2)

These principles are similar to many of the other assertions on what student learning outcomes assessment should include.

Boud (1995) also provides a list of seven ways that stakeholders judge learning outcomes assessment programs. First, what is being assessed should be clear to everyone involved and the tasks assessed should be broad in scope. Second, the assessment tasks should contribute to learning. Third, what is gained by the assessment should be clear. Fourth, assessment should help students contribute to their own learning process. Fifth, the rhetoric surrounding assessment should be clear of judgment and should be relevant to the task being assessed. Sixth, clear documentation or reports should be available that demonstrate the results of the assessment. Seventh, the assessment itself should be monitored and evaluated so that best practices are being used (pp. 46-47). In addition to Brown, Knight, Banta, and Boud, Suskie (2004) defines learning outcomes assessment as a four-step cycle that includes: one, establishing learning goals; two, providing learning opportunities; three, assessing student learning; and, four, using the results (p. 3). In order to be successful at assessing student learning, an institution has to promote a culture

of assessment on campus. To create this culture, she asserts that the following are needed: campus leadership must back assessment, the focus needs to be not on assessment but on teaching and learning, empowering faculty and staff working on assessment, making assessment relevant, providing opportunities to learn about assessment, setting clear expectations, being flexible, minimizing burden of assessment, starting small, starting with successes, involving students, celebrating and rewarding assessment efforts, using results appropriately, and not expecting everyone to be interested.

Like these above mentioned authors, most authors on learning outcomes assessment agree to at least three key parts to assessment. First, institutions need to clearly state what they want students to learn. Second, they need to gather evidence to support how well the students are meeting the goals, both directly through student work, papers, projects, performances and indirectly through alumni surveys, and placement rates. Third, the data collected should be used to improve the institution (Walvoord, 2004).

Judging the quality of the institutions because of the level of learning of the students is an essential factor in learning outcomes assessment. Richardson (1994) invokes this link between the students and institutions through his five definitions to assess quality in higher education: one, transcendent quality, which is the institutional rankings and reputation; two, cost/benefit quality, the comparison of inputs and outputs; three, process-based quality, the connection of stated standards with indicators; four, product-based quality, the performance of graduates; and, five, user-based quality, the level of client satisfaction. Kuh (2007) follows this school of thought because he sees learning outcomes assessment as a way to help institutions learn (or improve), share data (or become transparent), and report to policymakers (or be accountable). These

definitions move away from focusing on the students to focusing on the institutions and what they gain from learning outcomes assessment.

Pulled from these descriptions of student learning outcomes assessment, five areas are often highlighted; these areas are used in the discussions in the following chapters. The first is the need to be clear in the purpose and design of the assessment work. The second is the use of the assessment work needs to be defined. The third is that the methods need to be established. Fourth, the way that the information will be analyzed is important. Finally, the people involved with the assessment should be trained.

Importance. In essence, learning outcomes assessment is both for accountability and improvement of an institution. Shulman (2007) describes assessment as an “external evaluation” that serves as the “public conscience for higher education institutions” (p. 6). Learning outcomes assessment is important to institutions, policy makers and the public because it provides transparency into an institution’s mission, goals, and values, and provides the data for institutional improvement. According to Astin (1990), assessment—in particular, what an institution decides to assess—provides clues to an institutions values and goals. The university’s mission, then, should serve as the key to determining what the institution may want to assess. He claims that assessment “can enhance our educational mission both directly—by strengthening the teaching-learning process—and indirectly—by informing or enlightening us about which of our programs, policies, and practices are most and least effective” (p. 33).

Twenty years ago, Ewell (1990) wrote about the significance of a “new accountability” that would require policy makers, institutional leaders, and faculty to work together. He asserted that assessment “must work within a carefully crafted approach to systemic improvement” that serves to “foster quality” (p. 21). Assessment, then, can serve the teaching enterprise of colleges

and universities by offering important feedback for institutions on programs, curriculum, and student learning.

Shulman (2007) addresses assessment and accountability as a process of counting and recounting (or storytelling). In this process, it is important for institutions to have solid goals, missions, and purposes, so that they can choose what to assess. Institutions have the opportunity through assessment to tell a story about what they do well and what they need to improve upon.

Advocates for assessment such as Brown and Knight (1994) assert that assessment leads to better teaching and learning and that assessment reform is needed to assure that graduates have accomplished the necessary achievements (p. 12). Miller, Imrie, & Cox (1998) understand that “assessment is undertaken for many reasons,” and they list as the most important:

- To provide systematic indications of the quality of students’ learning for both teachers and students
- To maintain standards in professional education and in higher education generally
- To motivate students throughout their studies. (p. 4)

Banta (2004) agrees by saying that learning outcomes assessment allows institutions to “demonstrate course and program effectiveness” (p. 38), especially when institutions review individual as well as collective student work. She continues, arguing that the collective evaluation helps discern what is working and what needs to be done. Most practitioners of assessment would agree with these assertions, and yet Ewell (1994) explains that “to date, most of the data that have been collected under the label of assessment have not resulted in much change in teaching or in learning” (p. 8). He lists the following reasons why assessment does not work:

- “Assessment is most productive when faculty are directly involved in the assessment effort feel that it is legitimate, and know why it is being undertaken” (p. 9).

- “Assessment is more productive when data from multiple sources are used in combination, as part of a coherent effort to understand why a given set of outcomes is occurring” (p. 9).
- “Assessment is most productive when its results are analyzed fully to emphasize variations in outcomes as well as central tendencies and to examine the often distinctive experiences of different student subpopulations” (p. 10).
- “Assessment is most productive when an explicit structure for utilization is present from the outset” (p. 10).

Even though this assertion is over a decade old, the sentiment concerning assessment remains largely the same.

A Review of Accreditation

The literature as it relates to accreditation seems to focus on two themes: first, the history and purpose of accreditation; second, the intersection between accreditation and the federal government. As mentioned earlier, four types of accreditation exist in the United States (Eaton, 2009, p.80):

1. Regional accreditors—accredit public and private, mainly non-profit and degree granting, two-and four- year institutions.
2. National faith-related institutions—accredit religiously affiliated and doctrinally based institutions, mainly non-profit and degree granting.
3. National career-related accreditors—accredit mainly for-profit, career-based, single purpose institutions, both degree and non-degree.
4. Programmatic/specialized accreditors—accredit specific programs, professions, and free-standing schools such as law, medicine, engineering, and the health professions.

The literature review and the research project as a whole will focus on regional accreditation. As with literature on student learning outcomes assessment, the literature for accreditation involves few empirical research reports or studies.

History and Purpose. The history and the purpose of regional accreditation are intertwined. The regional accreditation commissions were founded to help answer the question “What is a college?” (Ewell, 2009a, p. 21). The first one to be founded was the New England Association, in 1885; Middle States Association followed in 1887 and Southern Association of Colleges and Schools in 1895 (Ewell, 2009a). By 1924, all of the regional accreditation agencies had been formed (Blauch, 1959) for this purpose:

Accreditation, as applied in education, is the recognition accorded to an institution that meets the standards or criteria established by a competent agency or association. Its general purpose is to promote and insure high quality in educational programs. (p. 3)

This early account of accreditation emphasizes the accreditors’ roles in quality assurance.

The key feature of accreditation in the United States is that it takes the place of what many other countries have in a national ministry (Ewell, 2009a). Accreditation is not exclusively a U.S. phenomenon, but it is mostly a U.S. phenomenon because of the void of a national ministry of education that would oversee quality in higher education as it does in other countries. In order “to avoid chaos, a practice of accreditation” (p. 3) was created in the United States. This organization of accreditation is different from any others in the world (Blauch, 1959).

Accrediting organizations are viewed as vehicles for institutional self-regulation, as Brittingham (2008) explains:

The American system of [regional] accreditation is different in three ways:

1. Accreditation is a nongovernmental, self-regulatory, peer review system.
2. Nearly all the work is done by volunteers.
3. Accreditation relies on the candor of institutions to assess themselves against a set of standards viewed in the light of their mission, and identify their strengths and concerns, using the process itself for improvement. (p. 10)

These three points illustrate the foundations of the accreditation system. In the beginning, “accrediting associations were established as member organizations, supported by dues and fees (and occasional private grants), providing the foundation for self-regulation and the independence that has helped accreditation preserve the autonomy of the institutions” (Brittingham, 2008, p. 11). They continue today as member organizations. As members of the accrediting associations, institutions have a say in guiding them either individually or through one of the professional organizations for which they belong, who also have a strong voice in accreditation.

Blauch (1959) identifies five purposes for accrediting institutions: first, accreditation serves to “encourage institutions to improve their programs by providing standards or criteria,” (p. 4); second, accreditation serves as a standard for students to transfer between institutions; third, accreditation serves those employers who hire the college graduates and those admissions officers who admit students for further study; and fourth, accreditation serves academia by “raising the standards of education”; and fifth, accreditation serves the general public by providing prospective students guidance about institutions (p. 4). Given the date of this book, the author does not include the Higher Education Act of 1965, which adds another purpose to accreditation—accreditors serve as the overseers of quality for the federal government and as gatekeepers for federal funds to higher education. Blach does not focus on the GI Bill’s affects on accreditation, but Thelin (2004) explains that after the GI Bill was passed the federal government wanted to protect veterans from phony institutions and diploma mills but at the same time “did not want to get into the business of certifying colleges and schools” (p. 265). Instead the government decided to accept regional accreditation as the surveyor of quality in American higher education. Thus, the GI Bill served as an impetus in federal backing of the accreditation

system. Brittingham (2008) lists similar items as benefits of accreditation, likely because she is responding to federal regulation whereas Blaich is simply providing an overview; she lists:

access for students to federal financial aid, legitimacy with the public, a ticket to listings in guides to college admissions, consideration for foundation grants and employer tuition credits, reflection and feedback from a group of peers, and keeping the government at arm's length through a self-regulatory process. (p. 18)

Eaton (2009) provides a more concise version of similar information saying that there are three roles of accreditation: quality assurance, provide access to federal and state funds, and provide private sector confidence. Further, Eaton (2009) explains the core values and beliefs of accreditation:

- Higher education institutions have “primary responsibility for academic quality”
- Colleges and universities are the leaders and the key sources of authority on academic matters.
- Institutional mission is key.
- Academic freedom flourishes in an environment of academic leadership of institutions.
- Higher education (like other industries) thrives on decentralization and diversity of institutional purpose and mission.

These accreditors' values are aligned with the goals for assessing colleges where the focus is mission driven and self reflective for the institutions. Thus, their approach is of quality improvement not of standardization (Brittingham, 2008). Standardization is seen as a hindrance or threat to the vast institutional diversity present in this country, so accreditation agencies emphasize that they are judging institutions based on the institutions' own mission statements. Since accreditation is mission driven, it can help support the various endeavors that colleges and universities have become interested in over the course of the history of higher education such as “increased access, mission differentiation, and experimentation” (Brittingham, 2008, p. 12).

Brittingham says, “Accreditation is not responsible for any of these features but it has supported

an environment in which all three could flourish while providing a basic framework that prevents chaos and promotes coherence in the system” (p. 12). The accreditation agencies can allow for these changes because of their mission driven approach, but also because of their self-regulated nature: “regulation seeks uniformity, whereas self-regulation is open to differences” (p. 19).

The specific process in which all regional accredited institutions must participate is described by Eaton (2009), but can also be found in various other documents including the web pages of the regional accreditation agencies. Eaton (2009) describes the process for accreditation review is as follows: first a periodic review—even accredited institutions must be reaccredited, then, a Self-Study—written summary of performance based on accreditation standards, next a Peer Review—group of faculty and administrators from comparable institutions visit campus and review materials. They prepare a report for commission; finally, a Judgment—accrediting organization makes a decision based on materials provided.

Brittingham (2008) explains this process in an historical context by explaining that in the time period between 1950 and 1965, when higher education was experiencing significant growth

the regional accrediting organizations developed and adopted what are considered today’s fundamentals in the accreditation process: a mission-based approach, standards, a self-study prepared by the institutions, a visit by a team of peers who produced a report and a decision by a commission overseeing the process of periodic review. With the basics in place, the regionals have worked to refine and strengthen accreditation, learning from experience, and adapting to changing circumstances and expectations. (pp. 14-15)

Accreditation standards have changed over the years. Accreditors before looked for evidence of institutional strength and capacity by examining the number of volumes in the library and professors’ credentials; now, more emphasis rests on the assessment of student learning. For instance, an example of the quantitative style of emphasis would be in 1934 the North Central Associations standards which states that an institution should have “at least eight departments each having at least one person of professorial rank” and have “a live, well-distributed,

professionally administered library of at least 8,000 volumes” (Zook and Haggerty, 1936 as in Ewell, 2009, p. 23). The ways that institutions are judged has changed and continues to change (Brittingham, 2008; Ewell, 2009; Bardo, 2009) in part because the technology has formed the process of accreditation by allowing for institutions to do more detailed analysis and reporting, but also because accreditation, like other social institutions, reflect the zeitgeist of the times.

These accreditation organizations are situated in regions throughout the United States. Some argue that given the regional differences in the country, the regional accreditation agencies are well adept to be able to adjust to these differences since they are situated in the region (Brittingham, 2008). While a national system would make everything more uniform, it would not address the nuances of the country. Examples of regional differences would be that New England is “a small densely populated area so there are no on-line institutions” (p. 20), or that the majority of HBCUs are in the Southern region. Some believe that these accreditation agencies can make decisions and recommendations based on their knowledge of the regions and the institutions in their region (Brittingham, 2008). Others talk about the need for standardization that allows for national standards, and they have been doing so since 1905; in 1918 American Council on Education (ACE), an “umbrella association” for higher education institutions was created and “became interested in standardizing higher education procedures as a result of its members’ continuing irritation with the growth of duplication of visits, reports, and costs for accreditation” (Bloland, 2001, pp. 17-18). Though ACE never became an accrediting organization, they set up a committee on accreditation that influenced the standards of the regional accreditation organizations. Various national organizations have come together to serve in this role of national coordination, and the current organization that serves that role is the Council of Higher Education Accreditation (CHEA), which was founded in 1996 “through a

referendum of college and university presidents” (Ewell, 2009, p. vi). CHEA is a membership organization for all degree-granting colleges and universities that has been “charged to provide national coordination of accreditation” (p. vi). The accreditors do not “report” to CHEA any more than institutions “report” to the regional accreditors. The accreditation agencies do, however, go through a similar self-study and evaluation process as institutions, but they do so with CHEA (Eaton, 2009). CHEA does not provide harmonization of the accreditation standards, but it does expect for the accreditors to follow the CHEA standards, which can influence the accreditation agencies.

Understanding the call for coordination, the regional accreditation commissions created a committee, called the Council of Regional Accreditation Commissions (C-RAC) in the 1980s to work together on similar interests, such as to

- Promote the improvement of higher education through the quality assurance processes of accreditation.
- Foster cooperation among the regional accrediting commissions
- Formulate and promote guidelines and best practices for use by the regional accrediting commissions.
- Foster cooperation with other accreditation agencies in the United States.
- Promote beneficial working relationships with the US Department of Education.
- Promote working relationships with Congress and state bodies, higher education associations and international entities.
- Serve as a voice and advocate for regional accreditation.
- Promote public understanding of regional accreditation.
- Undertake research about issues of importance to regional accreditors and institutions, and provide professional development for commissions.
- Gain efficiencies through joint or interregional projects.

- Undertake other activities to promote regional accreditation and support institutional quality. (Beno, 2009)

This council does not control the regional commissions but gives them the opportunity to work together on points of interest. For instance, one of the main accomplishments of C-RAC was to create documents and resources on student learning outcomes assessment.

Accreditation and Federal Regulation. A full understanding of accreditation must include the relationship that accreditation agencies have with the federal government because it is such a crucial aspect of accreditation, but also because this relationship is often so contentious that much of the literature on accreditation includes information about this relationship. Brittingham (2008) explains that the accreditation agencies have been involved in quality assurance since the 1950s—when the federal government decided that they would be a good choice to oversee quality and be “gatekeepers for federal funds” (p. 33). Since that time, the federal government has attempted to define what accreditation means and no time in the past more so than in the last few years, when the report commissioned by the recent past Secretary of Education Margaret Spellings, *A Test of Leadership: Charging the Future of U.S. Higher Education* (2006) (popularly called the Spellings’ report) and the Reauthorization of the Higher Education Act (2008) have been discussed. To place the current view of accreditation and its relationship with the federal government in context, the following provides an overview of the report and the re-authorization as they relate to accreditation.

First, the Spellings’ report caused a wave in higher education as leaders and administrators strove to imagine what this report meant for the future of higher education. The writers of the report saw that learning outcomes assessment could be proof that higher education institutions were indeed doing what they sought out to do. The report called for accreditation agencies to assist institutions in creating assessment and for institutions to share this information

for comparability. More or less, the report called for colleges and universities to examine the value-added in attending certain institutions and asked for the institutions to exhibit this information in a comparable form. In so doing, the institutions were asked to provide better information to prospective students.

This report emphasized that policy makers, students and their families, employers, and taxpayers want to know what they receive from higher education. Undergraduate education was the focus of this interest. Since the 1980s, an ebb and flow of interest in assessment has existed both from the public perspective as well as from the university perspective. For the public, their interest peaked during times of financial lows. Given that tuition will likely continue to increase above the level of inflation (Supiano, 2008), the public will continue to drive for more transparency and accountability. For higher education institutions, administrators focus on student learning during preparations for accreditation, which can be seen as both an evaluation for accountability but also for institutional improvement.

The debate about the role of accreditation began. As Lederman (2007, March 29) claimed, “accreditation has become the primary battlefield in the aftermath of Education Secretary Margaret Spellings's Commission on the Future of Higher Education, and about the argument over what ‘quality’ means in higher education” (para. 4). In 2007, some in the higher education community thought that a federal mandate would force regional accreditation agencies to require institutions to assess student learning outcomes according to the requirements set by the Department of Education. Judith S. Eaton, president of the Council for Higher Education Accreditation (CHEA), said that,

There is a low level of trust in social institutions . . . and there are continuing demands for greatly enhanced accountability and transparency. Higher education is going to remain essential and it's likely to remain expensive. So, it will have to think about being more

accountable and transparent, but it should not be regulated by the federal government” (Lederman, September 24, 2007, para.11).

What would or would not be regulated by the federal government was determined by the reauthorization of the Higher Education Act (HEA).

The HEA was being discussed during the same time period as the Spellings’ report. This Act was approved by Congress on July 31, and signed into law on August 14, 2008. Title IV of the HEA provides for financial aid, and institutions must be accredited to receive financial aid. Therefore, accreditation serves as the “gatekeeper” for institutions to receive financial aid from the federal government. Given this relationship and the current climate of accountability and assessment, accreditation constitutes a large part of the discussions of the reauthorization and the finalized bill.

Almost a year before the bill was passed, the regional accreditors helped conceive of the section on student achievement. While colleges and universities wanted complete oversight of their own learning outcomes, the regional accreditors argued that they should have a stronger role in deciding how the institutions were defining and assessing learning. They argued that institutions were given too much power if they could decide exactly what they wanted to assess, and that the accreditors as the “supposed assurers of quality in higher education” should have some control (Lederman, November 19, 2007). Steven D. Crow, executive director of the Higher Learning Commission of the North Central Association of Colleges and Schools responded, “The language appeared to say that whatever a college says is okay is okay. It appears to make it impossible for us to have a standard where we can ultimately say, ‘The academic performance here in not sufficient’” (Lederman, November 19, 2007, para.10). The college leaders proclaim that the accreditors “opened the door for the Department of Education to continue to try to press for more national regulation of sorts” (Lederman, November 19, 2007). The HEA, then, does say

that colleges and universities set their own learning goals, but these must fall within the standards of the accreditors. At the heart of the bill is student outcomes assessment and transparency, with the regional accreditors as the leaders to ensure that colleges and universities are doing both.

These two recent items have caused accreditation agencies to re-evaluate what they are doing and how they communicate what they are doing to a broader audience. John Bardo (2009) explains that the “rules” for accreditation are changing. A need exists for more constant oversight as the demands for accountability increases, and universities need to prepare for these changes. He speaks specifically about four critical changes:

1. The changing accreditation climate
2. The need to focus on assessment across all areas of the institution
3. Organizational approaches to continuing accreditation
4. Developing a culture of accreditation across campus traditionally was found only in professional colleges now will be necessary across campus. (p. 47)

He states that “accreditation standards are becoming much more outcomes based than in the past” (p. 48). For this reason accreditors will need to consider these questions:

- What will be the balance between government regulation and peer assessment?
- What is the nature of student learning, and how will it be assessed?
- How does credit transfer from one institution to another?
- How can the accreditation process be made more transparent?
- What is the nature of due process if accreditation is denied? (p.48)

The influence of the federal government will likely continue because of the link between federal financial aid and accreditation, which makes it likely that

the regional accrediting bodies will continue to be used by the federal government as a major instrument to effect change in colleges and universities. That is that the regional accrediting bodies can expect to remain at the center of the higher education storm. And it should be expected that there will be pressure on these associations to incorporate increased institutional regulation. (p. 49)

While all of the regional accreditors have adopted standards on student learning outcomes assessment, institutions will be pressured to “document student learning in all aspects of their education, not just with the context of a defined quality enhancement plan” (Bardo, 2009, p. 50). Moreover, it is thought that institutions will need to do so more regularly, possibly even annually. It is important to note that the 2008 version of the Higher Education Act “does not permit the secretary of education to regulate the portions of the law on how accreditors should specify and examine institutions with respect to student achievement” (Brittingham, 2008 p. 24).

Even though the policy debates on accreditation have been robust, regional accreditation agencies were not legally expected to make changes; yet institutions and accreditation agencies will likely continue to be scrutinized by the federal government

Because of the link between Title IV financial aid and regional accreditation, the importance of regional accreditation, the national concern over the costs of education, and, most critical, concerns regarding the nature of educational outcomes. (Bardo, 2009, p. 58)

The concern for accreditors and institutions is that learning outcomes assessment could become a method of standardization, which will not work for the wide range of U.S. institutions.

A Review of Accreditation and Student Learning Outcomes Assessment

Ewell (1984) says, “If there is one generalization that can be made about the academic community, it is that we place unusual value on acquiring information and using it for social and individual improvement” (p. 4). He explains that this is done through research and teaching, and yet when academics are asked to evaluate themselves, they have very little information about

what actually works in the teaching and learning enterprise. He encourages academics to “create explicit, institution-specific mechanisms for regularly assessing the degree to which we are in fact attaining our collective goals” so as to become “self-regarding” institutions (p. 5). In many ways, accreditors are asking institutions to be “self-regarding” by asking the institutions to define, assess, and use student learning outcomes. Bardo (2009) says that student learning outcomes assessment, as a way to assure quality, is at the “core” of all of the changes to the standards in the last decade. The regional accreditors each point out that not one assessment strategy works for every institution, and the regional accreditors have variations even among themselves, so no common understanding of what student learning outcomes assessment means for institutions or the accreditors is agreed upon. To provide an exact prescription would be to standardize the process, which neither the accreditors nor the institutions want to do. However, according to Ewell (1984), all institutions “have a responsibility to articulate such outcomes, to examine their success in attaining these outcomes, and to make changes in programs and services to improve their effectiveness” (p. 51). Various articles at this point such as Ewell (2001, 2009a) and Lubinescu, Ratcliff, Gaffney (2001) provide advice for accreditors as they move forward to looking at the intersection of assessment and accreditation.

In the pursuit of excellence, a need exists for a set of standards that includes “the available resources, the structure of programs and curricula, and the intellectual characteristics and attainments of faculty and students,” which has been a theme in accreditation (Ewell, 1984, p.12). The standards, though, need to be part of an “underlying process” (p.12); Ewell (1984) continues that “high levels of resources, well-structured programs, and an able faculty and student body are highly correlated with educational growth” (p.12). For an institution to be self-regarding, they would need to clearly state their learning goals, assess them, and make changes

(Ewell 1984). The regional accreditation standards address these concerns, and as Ewell (2001) points out, “Accrediting organizations have thus not been idle in the face of escalating needs to demonstrate what college students know and can do” (p. 4). They have, however, “responded in quite different ways and have moved at different speeds to develop new approaches” (p. 4). He says that there are “three dimensions” that accreditors need to consider when approaching the task of incorporating assessment into the standards: one, to what extent will they specify certain learning outcomes; two, to what extent are they interested in individual outcomes versus institutional effectiveness; and three, to what extent will the accreditors review the evidence (p.9).

In the late 1990s, accreditation began to redefine itself just as the field of assessment was gaining momentum (Driscoll, 2004), and “accreditation agencies became the driving force with the expectations for assessment and their insistence that campuses ‘raise their level of assessment activity’” (Driscoll, 2004, p. 11). At this time, the “new movement in accrediting circles” began that looked less like the traditional means of accreditation (finances, governance, faculty members, etc), and instead concentrated on student learning; many critics of accreditation were pleased (Wellman, 2000). They had criticized the accreditors for not doing this before because learning is such an essential part of the missions of colleges and universities that one would have thought that concentrating on learning would have been a central focus from the start. Still accreditation agencies should not be so “one-dimensional” in regard to quality (Wellman, 2000).

Even so,

it will be almost impossible to deny accreditation to an institution that is showing effort but, for whatever reason, fails to meet the mark. With fewer criteria to measure against, improvements in student learning will be hard to evaluate in decisions about granting accreditation. The evidence for accrediting decisions has to be objective and solid enough to withstand politics and even litigation. (para. 4)

This sentiment about enforcing student learning outcomes assessment is still common today.

Beno (2004) states that the accreditation standards used by regional accreditors now include student learning outcomes assessment as a “central process in evaluating institutional effectiveness” (p. 65). This is occurring after a “decade-long movement in higher education to assess student learning” (p. 65). The idea behind it is that “more directed concern with student learning outcomes will lead to better learning” (p. 65). She says that “accreditors came to understand that quality review processes that include a focus on student learning draw the accreditation process itself nearer to its true purpose of assessing the quality of education offered by an institution of higher education” (p. 66). The central purpose for accreditation is to improve institutional quality; thus, accreditors see student learning outcomes assessment as a means to precisely that. In fact, Beno explains

Accreditors have done more than add student learning to the list of indicators of institutional effectiveness. They have recast the meaning of institutional effectiveness to require that institutional assessment and improvement strategies ultimately support learning or result in improved student learning. (p. 67)

They have done this by asking not only that student learning outcomes are clearly listed, but that the institution assess the outcomes as part of its internal institutional review (p. 67). Eventually, such reviews will be made publicly available to assure transparency (Beno, 2004).

Many articles, chapters, news reports, and books address the future of accreditation as it relates to learning outcomes assessment, none more than Ewell. He acknowledges that accreditors have been looking at student learning outcomes now for almost two decades, but he says, “it can be confidently predicted for the coming decade that they will be pressed to do even more” (Ewell, 2009a, p. 155). Though he is not exactly sure how accreditation will play out, he lists four imperatives: first, even though the Spellings report and the Reauthorization of the Higher Education Act have given the authority to institutions to collect evidence, accreditors will

be pressured “to impose sanctions on institutions and programs if they fail to undertake these promised assessments and to provide evidence that student performance indeed measures up to established standards” (p. 156); second, accreditors will need to explore ways to show evidence of learning outcomes in a way that can be “externally benchmarked or compared without trivializing collegiate teaching and learning” (p. 156); third, accreditors need to be more involved in educating institutions about assessment practices and ways to measure student learning; and finally, accreditors may need to align their standards for learning outcomes assessment, so that there is a “common language to describe learning outcomes” and “descriptions of what constitutes good evidence” (p. 157).

Chapter Three

Methodology

This chapter reviews the research questions, sets forth the methodology and articulates the methods of analysis to be applied. First, I will elaborate more on my research questions. I will describe why I selected particular questions over others, as well as the process of selecting this particular question and set of sub-questions. Then, I will talk about the study's methodology. The next part of this chapter will be a section on the techniques. After that discussion, I will describe the methods of analysis for the study. In short, this project is a case study of regional accreditation on the topic of student learning outcomes assessment through a careful analysis of the standards for accreditation that each accreditation agency provides to its members, interviews of representatives at the regional accreditation organizations, and data gathered from a Council for Regional Accreditation (C-RAC)/ National Institute for Learning Outcomes Assessment (NILOA) Symposium on Student Learning Outcomes Assessment and Accreditation.

Revisiting the Research Questions

This study examines the role of regional accreditation practices in relationship to learning outcomes assessment at American colleges and universities. As a basis for the study, a main question is identified along with several sub-questions. The main question broadly captures the topic: How are regional accreditation policies and practices understood to leverage student learning outcomes assessment efforts on US college campuses? Because of the broad nature of the question, I have decided to include several sub-questions that will develop a more specific basis for approaching the main question.

The sub-questions reflect various themes found in the literature (Banta, 1993; Banta, Jones, & Black, 2009; Boud, 1995; Suskie, 2004; Walvoord, 2004; Richardson, 1994).

Essentially, these themes focus on

- **clarity** (How do regional accreditation standards frame the requirements/expectations for learning outcomes assessment?),
- **use** (What requirements/expectations do regional accreditors state for the *use* of outcomes assessment data?),
- **methods** (What is the expected role of faculty in the accreditation process as it relates to learning outcomes assessment? How do the regional accreditors specify frameworks within which learning outcomes assessment is to be addressed by institutions?),
- **analysis** (How does learning outcomes assessment figure into site visits, team reports, and accreditors' actions and decisions?), and
- **training** (Are regional accreditors providing resources to institutions on strategies for learning outcomes assessment?).

An article by Brittingham (2008), the president of the New England Association of Schools and Colleges Commission on Institutions of Higher Education, was particularly useful in establishing sub-questions. It provided insight concerning what accreditors are likely to do given the current climate of learning outcomes assessment and the request for accountability:

1. Encourage institutions to improve their assessment programs—and push them when necessary; [*clarity* and *methods*]
2. Provide a safe space for experimentation; [*methods*, *training*, and *analysis*]
3. Devise ways for institutions to learn from each other; [*training*]
4. Help policy-makers and the public understand that assessment at its current state of development is not the only way—and arguably not yet the most powerful way—to judge academic quality; [*use* and *analysis*]
5. Make appropriate judgments and apply sanctions when institutions do not meet expectations that they have systematic and effective methods to understand what their students are learning; and [*analysis*]

6. Develop the means to ensure that the public gets useful and appropriate information about student learning and success.” (p. 37) [*use*]

In the above list, I show through bracketed notes how my categories align with the key points made in this article. These points have guided my questions.

Methodological Overview

The methodological overview section is intended to suggest the philosophical framework regarding case study, qualitative research, field theory, motivation, and the assumptions, expectations, and audience of the study. The intention of this section is to reveal the approach of the researcher.

This research project is a case study using qualitative methods to examine the bounded system of regional accreditation. As Stake (1995) claims, a “case study is the study of the particularity complexity of a single case” (p. xi). A foundation of qualitative research is that the researcher is part of the research, as Geertz (1973) points out, “We don't study villages, we study in villages” (p. 22). Qualitative research builds on the construction of reality for the researcher and what she has learned. Ultimately, the case is filtered through the research and is a “personal account” (Stake, 1995, p. 42). Another feature of qualitative research is that the questions orient the study, but the conditions are not known in advanced. Therefore, the case is not limited, but allows for questions to emerge. Advantages of qualitative research are that it allows for the researcher to be “alert” to the unexpected and allows for “flexibility of perspective” (Weiss 1998, p. 253). For instance, my questions explore how accreditation policies and practices figure into site visits and team reports. Through the interview process, I became interested not only in how institutions were being deficient, but also how they were being successful. Thus, I allowed myself to be guided by curiosity rather than being completely fixed on pre-set decisions.

Moreover, I would assert that much as student learning outcomes assessment can be formative or summative, so can research of this nature. My intention is that this project serves as a formative evaluation of the accreditation regions, because I am looking at the process of regional accreditation as it relates to the student learning outcomes assessment movement.

Theoretical Perspective

Pierre Bourdieu introduced field theory into the idiom of sociology during the 1980s, and during the 1990s, his work had considerable impact on a range of disciplines, including education. Despite the growing importance of Bourdieu's theories to the study of higher education, his notion of the field has not yet been used to examine the practices defining the culture of accreditation and assessment in higher education. My study employs field theory to examine regional accreditation agencies as groups or institutions that not only occupy strategic positions within the larger landscape of the field of higher education but also shape learning outcomes assessment policies and procedures locally on college and university campuses.

In *The Field of Cultural Production*, Pierre Bourdieu (1993, 1999) uses the concept of the "field" to examine "structural relations—invisible, or visible only through their effects—between social positions that are both occupied and manipulated by social agents which may be isolated individuals, groups or institutions" (p. 29). Commonly regarded as a refinement of Weber's approach to culture as a symbolic system, field theory provides a way of mapping complex relationships "between systems of thought, social institutions and different forms of material and symbolic power" (Johnson, 1999, p. 1). Within a field, agents take up strategic positions with the goal of securing capital, prestige, or other "external or specific profits which are at stake in

the field” (Bourdieu, 1993,1999, p. 30). A field comprises a structured competition for resources and the means of reproducing culture and its attendant forms of knowledge.

Field theory has the potential to redefine the approach to accreditation and learning outcomes assessment in two ways. First, the discussion of outcomes assessment has been overly reliant on accountability as an explanation for the culture of assessment in higher education. For Bourdieu, a field is defined by ongoing struggles, by complex and strategic relations between interested groups. The structure of the field is the sum of these relations rather than determined by any single relation. As such, a field is a largely self-regulating structure in the sense that it is the product of strategic positions and interventions within the field, not of top-down or unilateral governance. Bourdieu emphasizes that “agents don’t act in a vacuum but in a field” (Johnson, 1999, p. 6) or one could say in many overlapping and linked relations. Bourdieu’s field theory provides a sound approach for thinking about the complex relations surrounding the practices of accreditation and assessment in higher education, in particular, the types of economic and symbolic interactions that take place between: regional accreditation agencies, the federal government, higher education institutions, administrators and faculty, and the public. As noted earlier, higher education has involved from the beginning an idea of “critical self-assessment and redefinition,” or a self-regulatory impulse that trends higher education toward higher standards and a culture of improvement geared toward making education a public good.

Second, Bourdieu imagines field theory as a form of cultural reflexivity (Bourdieu and Wacquant, 1992). In Bourdieu’s sense, strategy is not a simplistically conscious relation defined by rationality. A strategy is “a specific orientation of the practice. As a product of the habitus, strategy is not based on conscious calculation but rather by results from unconscious dispositions towards practices” (Johnson, 1999, pp. 17-18). Furthermore, it combines the rational with the

“illusio” or an intuitive feel for the game, that is, for the conditions of possibility embedded in the field (Bourdieu and Wacquant, 1992, pp. 116-117). Mapping the field is an act of bringing this largely unconscious aspect of strategy into consciousness. Bourdieu, for instance, discusses the difficulty of separating a cultural practice from the perception of it, from the symbolic meaning assigned to it, despite the fact that the practice may be open to varying interpretations (Johnson, 1999, p. 4). Outcomes assessment is in many ways mired in just such a perceptual rut, seen too often as the result of external intrusion (from governmental agencies, from mainstream consumer culture, from administration on faculty rights, etc.) rather than as a possible site of strategic advancement. Assessing assessment, mapping its current structure and influence, is a way of discussing its legitimacy based on empirically-based discussion of the influential positions being taken up in the field.

Of key importance to thinking about positions and interventions within a field of cultural production is Bourdieu’s concept of “habitus,” which describes those “transposable dispositions” or “principles which generate and organize practices and representations” within the field but also, as a result, change the field and the conditions of possibility within it (Johnson, 1999, p. 5). Competing interests are built into a field, and habitus is a key tool for analyzing the distribution and organization of agents within the field, as well as for inquiring into the degree of cultural authority and legitimacy ascribed to them. Habitus allows for thinking of accreditation and assessment in terms of disposition, strategy, and trajectory, or as practices in higher education that are at once structured and structuring. Trajectory, in particular, plots the course of the organization as it moves through various positions in the field, facilitating “an understanding that it is only in these successive positions” where it can be defined (Johnson, 1999, p. 18).

Some questions asked within field theory are the following: what relations define the structure of the field? Which agents occupy the field and what are their positions? What are the interests of the various agents within the field? How do these compare to the broader perception of their interests? Which forms of strategy and investment are advocated by the agents (or stakeholders) in the field? Essentially, that emerges through a field theory approach is a “general science of the economy of practices” (Johnson, 1999, p. 8), that is, a possibility of mapping the “logic of practice” within the field (Bourdieu, 1990, p. 27).

Field theory has allowed me to carefully analyze the structure of the field. For instance, for accreditation and student learning outcomes assessment, the accreditation agencies are a system that oversees the system of higher education; they can generate or organize around certain concepts such as student learning outcomes assessment. The accreditors can then “generate practices and perceptions” about student learning outcomes assessment for colleges and universities. At the same time, accreditation is considered a self-regulatory system for higher education because it does not have direct federal oversight. This system, then, diffuses its power among the large decoupled American higher education system, while at the same time giving it power from the bottom up.

In addition to the structure of the field, careful attention has been paid to the interlinked practical and symbolic forms of agency. To that end, the examination of the standards for mentions of student learning outcomes and of the accreditors’ expectations for colleges to use it showed the variable scope of accreditors’ influence in this area. Looking at accreditation in this way provided general information on the influence of accreditation on institutions of higher education, but to provide focus, I looked at that influence, specifically as it related to learning outcomes assessment. Through answering the questions about the field in which accreditation is

enacted, I essentially asked: what empirical perspective can be gained by looking at regional accreditation practices for accrediting colleges and universities?

As I mapped the field for learning outcomes assessment as it exists within accreditation standards and practices, I looked carefully at the context of accreditation and how accreditors perceive their influence on student learning outcomes assessment at colleges and universities. It provided me with a framework to think about my questions, my research design, and my findings. This theory more than others provided a type of organization that fit well with the project and the research methods.

Motivation

My motivation for doing this study was to learn more about higher education, and the intersection of student learning outcomes assessment with regional accreditation. I was curious to know more about regional accreditation organizations and to understand how they see their role in the student learning outcomes assessment movement. This study is part of a larger project that I am involved with through the National Institute of Learning Outcomes Assessment. This project, along with other studies from the Institute, informed the participants of a National Symposium on accreditation and student learning outcomes assessment. In addition, this study fulfills the degree requirements for the doctoral program in Education Organization and Leadership.

For these reasons, I bring multiple lenses to this project. I am situated within academia not as a faculty member or academic administrator, but as a researcher and a student. I am not a part of the accreditation agencies, the federal or state governments, or the national collegiate leadership organizations.

Assumptions and Expectations

Having read the literature and having worked in higher education for my entire career, I have certain assumptions about accreditation based on my limited experience with the accreditation process. Even though it is self-regulatory, I have heard people talk about it as a form of compliance that involves a drawn out, expensive process. I have been a participant in the accreditation process in two ways: one, I have witnessed some of the work that goes into preparing a self-study report and have been asked for reports to support the study; and two, I have attended various meetings with the site visitors during accreditation visits as a professional, where the atmosphere was friendly, with an undertone of anxiety. These experiences add to the lenses that I bring to this research project, but they also provide me with some of the assumptions that campus leaders bring to the accreditation process. Though my project is not about the campus perspective, it helps to have an understanding of some people's perception of preparing for accreditation and the site visit. This understanding provides an assumption about how people see the role of the accreditors.

I expected that the accreditors with whom I met would be forthcoming about sharing what they do well and would likely highlight their successes. Because of the private nature of accreditation decisions, they may not be forthcoming on issues that are contentious. I found this to be true. Many of the accreditors had reservations about sharing any information specific to the accreditation decisions on institutions. Many of the accreditors also asked for quotes to be removed from the study because they felt that they may be misconstrued. Based on their websites, I expected to have different experiences at each of the seven locations and see different levels of engagement with assessment. I expected that items would come up that I did not anticipate, and I found that there was even more involvement and change than I expected. For

instance, a first contact with Middle States resulted in them sending information that they collected (some private and others on their Web site) as well as websites with which they are influenced. I was surprised at the depth of material they had and the level of enthusiasm they have on the topic.

Audience

The audience for this study will be people associated with the internal workings of the institutions such as researchers, the accreditation organizations, faculty, administrators, governing boards, and those external to academia, such as policy makers, prospective students and their families, and the general public. Not only does this list constitute the audience for the study, it also identifies the context for the study. The context is broad reaching. It includes the colleges and universities, the regions, and the regional accreditation agencies as well as government agencies both state and federal.

Research Techniques

Bogdan and Biklen (2003) define data as “the rough materials researchers collect from the world they are studying” (p. 63). Data, then, become the “basis for analysis” (p. 63). In qualitative research, data can be information collected by the researcher such as fieldnotes, observations, or interview transcripts as well as information that the researcher discovers in official documents or journal articles. This section of the chapter will provide an overview of my data collection techniques, including information on the sampling, observations, interviews, and text analysis.

Sampling. The sample for this study is the seven regional accreditation associations, in essence the population. I decided to analyze all seven because of the diversity of the regions, and because of my interest in how higher education as a whole is being influenced by regional accreditation. I did not include the professional, national, or faith-based accreditation agencies. Though these organizations are doing interesting work, a majority of United States colleges and universities are regionally accredited, due to the link with Title IV of the Higher Education Act, which allows for institutions with regional accreditation to receive federal funding. By focusing the study on the regional accreditation agencies, I, in essence, find out the expectations for the largest group of institutions. I have interviewed at least one or two contacts at the regional accreditation organizations, and I believe that there is “value of small purposeful samples” (Patton, 2002, p. 581). The people with whom I spoke were the ones closest to the learning assessment initiatives at the organization. The presidents of the organizations provided me with the names of the people who served as my contacts and interviewees.

Observations. The setting of the research project took place at the six of the seven regional accrediting associations. Northwest Commission on Colleges and Universities (NWCCU) was not able to meet with me. I personally visited each of the offices to have access to office documents and to interview contacts at their office spaces. In addition to visiting the headquarters of each of the accreditors, a majority of the text analysis took place over the internet. I have carefully analyzed the accreditation associations’ websites, with careful attention to their standards for accreditation. This setting, though digital, offers a basis of analysis.

In addition, a symposium was held that gathered the representatives of each of the regional accreditation agencies and several experts on assessment to a single location at the Lumina Foundation headquarters in Indianapolis, Indiana. The attendees discussed the

similarities and differences of their associations in regard to learning outcomes assessment.

Besides presenting an early draft of my data, I took careful notes and recorded this meeting, and this data became part of my analysis.

Text Analysis. Textual data is gathered the same way as interviewing or observations, according to the theories of qualitative research (Stake, 1995). The documents collected can be “analyzed for frequencies or contingencies” and often can “serve as a substitute for activity that the researcher could not observe directly” (p. 68). Bogdan & Biklen (2007) state that textual data are “useful in understanding official perspectives on programs, the administrative structure, and other aspects of the organization” (p. 137). To gain a better understanding of the research project, I have reviewed each of the accreditation agencies websites in a systematic way. First, a list of questions was crafted for which to review the sites (APPENDIX A). Next, the websites were reviewed for information on student learning outcomes assessment, and the standards as they related to learning outcomes were copied. I was also given various documents when I visited the agencies such as conference programs and proceedings, workshop materials, training materials, and letters sent to institutions. As much as possible, I tried to answer the questions using the accreditors’ own words from their written documents. In addition to answering the questions, I used a method for analyzing the text called “strong reading,” as defined by Bartholomae and Petrosky (2002). This method moves beyond typical ways of reading for “finding information” (p.1), “memorization” (p.6), “identifying main ideas” (p. 1) to reading the text so as to interpret and analyze it around a central issue or problem. Whereas the former way of reading is more passive, strong reading is more active. The reader engages with the text to explore possible meanings, “speculating on possible rather than certain conclusions” (p. 14) . Reading in this critical way and taking careful notes prepared me for the interviews by giving me not only the

information directly from the standards but an analytical view of the materials that I then clarified against the viewpoints of the interviewees.

Interviews. “An interview is a conversation that has a structure and a purpose” (Kvale, 1996, p. 6) that involves seven stages. First, the researcher must develop the research questions. Second, she should design the study to address the questions. Third, the researcher should conduct the interviews. Then, the interviews need to be transcribed, analyzed, verified, and reported, respectively fourth, fifth, sixth, and seventh (Kvale, 1996). In the case of my study, I conducted semi-structured interviews with one or more members of each of the accreditation agencies, with the exception of the Northwest region as its staff did not agree to meet with me, and followed the seven stages that Kvale lists. After identifying my research questions and discussing them with the committee, I next developed interview questions (Appendix B), which I constructed based on the questions I asked for the website review. I provided the website analysis to the contacts prior to meeting with them, so they would know what I was going to ask and what I had found prior to our meeting. Many returned this document to me with additional information that I had not found on the websites. I followed the advice of Stake (1995), who says that an interviewer should come to the interview prepared with a “short list of issue oriented questions” that will assist her to “aggregate perceptions or knowledge over multiple respondents” (p. 65). As mentioned, I created a list of interview questions, but I emphasize that this was a semi-structured interview, so I reacted to the responses from the questions by asking additional clarification questions when necessary.

To that end, I scheduled my interviews during July 2009. I met with one person at the Middle States Commission on Higher Education (MSCHE) for roughly four hours, five people at the New England Association of Schools and Colleges Commission on Institutions of Higher

Education (NEASC) for about five hours, one person at North Central Association of Colleges and Schools the Higher Learning Commission (NCA-HLC) for about three hours, one person at Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) for two hours, two people at Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges (WASC-ACCJC) for two hours, and two people from Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC-ACSCU) for about five hours. I had allotted two hours in each of the locations, but in some cases after the interview started I continued the interview as time allowed. Having the interviews in the summer, according to many of the respondents, allowed them to talk at length with me. They have very little time during the academic year because they work closely with institutions and travel frequently.

Stake (1995) says a tape recorder is not needed and that “getting the exact words of the respondent is usually not very important” (p. 66). What is important is what the interviewee means. This involves the researcher being a good listener and taking notes for clarification, and then immediately after the interview, writing out the notes. Even so, I recorded each of the interviews. Having the recordings allowed me to listen more closely at the time of the interview and to jot down important notes, knowing that I could get details from the recording at a later date. Even so, I did not entirely transcribe every interview. Instead I listened closely to each of the interviews, took detailed notes, and transcribed sections from which I thought I might want to quote direct language. After doing so, I carefully read and analyzed the notes to identify themes as detailed below.

Methods for Analysis. This section describes validity and the process I undertook to analyze the data. Wolcott (1994) identifies various definitions on validity: one from Cronbach, “the process of examining the accuracy of a specific prediction or inference made from a test score” (p. 344); one from Pertti and Pelto, “Validity refers to the degree to which scientific observations actually measure or record what they purport to measure . . .” (p. 345); and one from Goetz and LeCompte, “Validity is concerned with the accuracy of scientific findings. Establishing validity requires (1) determining the extent to which conclusions effectively represent empirical reality and (2) assessing whether constructs devised by researchers represent or measure the categories of human experience that occur” (pp. 345-346). This collection of definitions suggests that validity is essentially a way of establishing accuracy.

As Stake (1995) says, there are “two strategic ways that researchers reach new meanings about cases . . . through direct interpretation of the individual instance and through aggregation of instances until something can be said about them as a class” (p. 74). Instead of generalization, he calls understanding the meaning as “a search for patterns, for consistency, for consistency within certain conditions” called “correspondence” (Stake, 1995, p. 78). My intentions were to review the data in exactly this way. First, I collected the various strands of information that I had gathered (the standards, the information provided from the website and from the accreditors, the interviews and the information from the Symposium). Second, I wrote a separate section for each of the seven accreditors that pulled together the various streams of data. My objective was to outline how the information both answered my questions, but also told a story of the expectations of the accreditors for collegiate learning outcomes assessment. To that end, I aggregated the various data points, looked for themes, coded them, and synthesized the separate accreditors’ sections to come up with the six findings that are listed in Chapter Five using the theoretical

framework identified earlier. The process of analysis included carefully reading and re-reading the various items I used as data (the information from the web sites, the standards, the interview notes, the documents from the accreditors, and so on). I used the research questions as a guide and whenever information connected to the questions, I wrote a few key words about the way it connected and placed a color coded post-it note on that page, using the methods of Miles & Huberman (1984). I then wrote a short one-page overview of what I was finding for each accreditor. The data was then organized and narrated into what became Chapter Four. This chapter was read again and coded in a similar fashion. By recoding the written chapter as well as my notes I was able to carefully re-examine and verify that the information followed patterns and re-review for themes both within accreditation agencies as well as across them. While I looked for certain items that I have listed in my questions (clarity, use, methods, analysis, and training), I was open to find other themes although, as it happened, these were general enough to fit all aspects of the study. Provided herein is a case of regional accreditation as it relates to student learning outcomes assessment for American higher education.

Stake (1995) says “in our search both for accuracy and alternative explanations, we need discipline; we need protocols which do not depend on mere intuition and good intention to ‘get it right.’ In qualitative research, those protocols come under the name ‘triangulation’” (p. 107). Weiss (1998) defines triangulation as a “cross-check through different modes of inquiry” (p. 263). I have included in the study a textual analysis of the standards, which was shared with the interviewees, and then the interviewees clarified my responses to the textual analysis and provided additional insight into the accreditation standards. This step serves as triangulation of the standards. In addition, after I wrote Chapter Four, I sent the specific section to the contacts who I interviewed, so that they had a chance to respond to my information. All of the

respondents, except for Middle States Commission for Higher Education, provided feedback on the accuracy of the document, and I revised as necessary. Having done so, I think the work is more accurate than if I had not.

Summary of Methodology

To summarize, in this research project I sought to answer the question: **How are regional accreditation policies and practices understood to leverage student learning outcomes assessment efforts on US college campuses?** To do so, I used a case study approach using qualitative research methods. My data collection involved textual analysis, interviews and observations of the Symposium on regional accreditation and student learning outcomes. Particularly, I examined the regional accreditation web sites and their standards for information on student learning outcomes assessment. Then, I interviewed representatives of the regional accreditation agency at the site of the agency. After carefully analyzing and collating the data, I then interpreted it, looking for themes to emerge. Further, I employed a philosophical framework by using the field theory of Bourdieu to map the field of accreditation and student learning outcomes assessment. This approach informs my final analysis of the data.

Chapter Four

Overview of Each Regional Accreditation Agency

Introduction

Regional accreditation agencies are designed to provide quality assurance as it pertains to institutions fulfilling their stated missions. The diversity of American higher education means that institutional missions vary due to geographical, cultural, and internal factors. Perhaps for this reason, regional accreditors all define their role as recognizing and supporting institutions while holding them accountable for their own missions. Each of the regions has a central office with a staff that provides day-to-day office assistance. The size of the staff for each agency ranges from eight at Northwest Commission on Colleges and Universities (NWCCU) to forty-two at Southern Association of Colleges and Schools Commission on Colleges Commission on Colleges. Each region has a Commission of around twenty people who make the final decision about accreditation. The Commission is an elected group, including representatives from the college and at least one public member. At the core of the accreditation process are the peer evaluators. Each region keeps a database, usually listing more than a thousand peer reviewers. The peers volunteer to participate or are suggested by a university president.

While the regional accreditors' policies vary, the basic processes for accreditation follows a similar patterns that include standards, self-studies, peer evaluations, campus visits, accreditation reports, and accreditation actions (or judgments). The standards are guidelines that the Commissions provide for institutions and that serve as checklists of the expectations that all institutions must meet to obtain or maintain accreditation. At the same time, these standards tend to be general rather than prescriptive, allowing them to be used by a variety of institutions. One

of the most important features of regional accreditation is that they are membership organizations; therefore, the presidents of institutions approve accreditation policies and procedures and thereby consent to the standards by which accreditation Commissions will hold their institutions accountable. The accreditors expect institutions to abide by certain standards and strive for continuous improvement.

The self-studies comprise both a process and a report. Each institution is asked to evaluate itself based on the regional standards and to provide a report of this evaluation to a team of peer evaluators. In most instances, peers have the opportunity to be trained by the region's staff, and such training typically includes instruction on the standards and the accreditation process. Peers' primary duties are to read the institutional self-studies, participate in the campus visits, and write a report on their findings. The peers volunteer to partake in this process, and, according to several of the accreditation region representatives, the peers learn a lot from the process, which is why most of the accreditors prefer to have large pools of people to do peer review rather than a small "expert" pool.

The visits last two to three days, with the peers often investigating and interviewing various groups across the campus to substantiate what is written in the self-study and explore the question of what might be missing from it. At the end of the visit, the chair of the peer evaluation team shares a report with the president of the institution and with whomever else the president chooses to invite to the meeting. The institution then has an opportunity to respond to the report. The reports and the responses are given to the Commissioners of the region, who make the final decision concerning the accreditation status of the institution. Only Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC-

ACSCU) has staff members attend the campus visits, and even so, they do not stay for the entire visit and are not involved in writing reports. No region's staff makes accreditation decisions.

The resulting decisions are frequently more involved than simply affirming or denying accreditation. The decision, for instance, describes any follow-up information that the institution needs to provide to the Commission. Institutions may receive recommendations for follow-up, which help the institutions know what to address in the next report, including: 1) additional information, which the institution would provide through a report or letter; 2) progress letters, which update the Commissions on the efforts at the institution; 3) monitoring, which involves specific interactions with the Commission because significant requirements must be met for the institution to be in compliance; and 4) focused visits, which require that a peer review team to follow up with another visit to the institution. Institutions may receive only these requests, or they may also be placed on warning. The latter happens only if the Commission thinks it possible for an institution somewhat out of compliance to redress the situation within a reasonable amount of time. If an institution is wholly out of compliance, it is placed on probation. While warnings are not typically public information, probationary status is displayed on the accreditation agencies' web pages.

Beyond these facets of the accreditation process, most Commissions request annual reports on items such as finances, enrollment, and other substantive institutional changes. The basic cycle for reaccreditation is ten years, except for Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges (WASC-ACCJC), which has a six year cycle because it only accredits two year institutions that are on a shorter graduation cycle. Most accreditors also require a report in the fifth year that falls between the annual report and the self-study in terms of its scope.

This chapter provides an overview of each of the regional accreditation organizations. The data is drawn from the accreditors' websites, standards, policies, and workshop materials, and—with the exception of Northwest—from personal interviews. As organized, the chapter offers an overview of each organization, including its mission or purpose; demographic information; background; student learning outcomes assessment information; standards; student learning outcomes assessment resources; peer review; and accreditation actions.

Middle States Commission on Higher Education (MSCHE)

The Middle States Commission on Higher Education is a voluntary, non-governmental, membership association that is dedicated to quality assurance and improvement through accreditation via peer evaluation. Middle States accreditation instills public confidence in institutional mission, goals, performance, and resources through its rigorous accreditation standards and their enforcement. (MSCHE, 2010)

The mission statement above provides insight into how MSCHE serves as the quality assurance mechanism for this region. F. Taylor Jones (1959), who served as the Executive Secretary for the organization, states that the accreditation process is more important than accreditation itself because the process “simulates and helps [institutions] perform their maximum education services” (p. 43). This sentiment is also reflected in the MSCHE core values, which mention “institutional improvement,” “respect for the unique mission,” and “attention to and emphasis on both improvement and compliance” (MSCHE, 2010a). As with the other Commissions, its functions are carried out by the Commission, peer evaluators and staff members. Recognizing its members need for additional guidance, since 2005 the MSCHE staff has included an assessment expert whose role includes preparing materials, organizing and leading assessment workshops, and other related activities (personal communication, July 30, 2009).

Demographics. This accreditation agency, headquartered in Philadelphia, Pennsylvania, accredits 521 institutions in the MSCHE region of the United States including Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, the U.S. Virgin Islands, and several locations internationally. Despite having a higher number of private institutions (57%) in the region, the public institutions educate more students (MSCHE, 2009a, p. 2).

This region has an assortment of schools and systems offices. While Delaware and DC are very small, New York has a very large system, and the New York education department is also a recognized accreditor. Four major systems in the region are State Universities of New York (SUNY), City Universities of New York (CUNY), Pennsylvania universities, and Puerto Rico universities. Overall, the region includes a diverse group of institutions, such as public, private, commuter schools, and schools with adult learning. It also includes several historically black colleges and universities and a few Hispanic serving institutions. A significant number of “outlier institutions” such as the National Defense University, National Labor College, The American College, and Gallaudet University, which serves deaf and hard of hearing students, make up the region because it covers New York City and Washington DC. Some institutions are very small with a distinct mission, such as Sisters of the Assumption, which has about 25 students who are training to be nuns, with three nuns operating the school.

Background. MSCHE was founded as the Commission on Higher Education in 1919. Four college presidents from Cornell, Johns Hopkins, Columbia and Vassar actually began discussing this organization and its policies in 1887 (Jones, 1959). The initial plan for MSCHE was to

standardize the qualifications required for admission to college; to determine the desired characteristics for college preparatory schools; to recommend courses of study for both

colleges and schools; to foster relationships among schools, colleges and the government; and to study and recommend best practices of organization and governance. (Middle States Commission on Higher Education [MSCHE], 2009, p. 2)

Not until 1919 did the Commission begin to accredit institutions and in 1921 a list of accredited institutions was made available (Jones, 1959). From 1921 to 1946, institutions had little contact with MSCHE, but in 1946, a shift took place in the policies and procedures. Rather than looking at “minimal standards” MSCHE began emphasizing “the improvement of institutions” (MSCHE, 2009, p. 5). In 1946, the members decided that evaluation teams would visit campuses, and by 1957, the regional members had agreed to a ten year cycle for these evaluations. In 1971, MSCHE shifted its self-study practices from institutions answering questionnaires to institutions providing narrative and qualitative data for accreditation; this shift was represented in a guide, the *Handbook for Institutional Self-Study*, which was published in 1978. Issues of transparency also arose in the 1970s as the region had to respond to “challenges from government, the courts, and the public” (MSCHE, 2009b, p. 10). This discussion, in turn, led to the development of the “Statement of Accreditation Status,” a statement “provid[ing] a brief summary of each institution’s accreditation history and current status” (MSCHE 2009b, p. 14). In 1996, MSCHE reviewed its standards and developed the *Characteristics of Excellence*, a document that includes the current 14 standards, one of which focuses on student learning outcomes assessment.

Student Learning Outcomes Assessment Information. In 1996, the new MSCHE standards (that is, the *Characteristics of Excellence*) changed. Of particular importance was the addition of student learning outcomes assessment expectations (MSCHE, 2009b, p. 7). Because of the complexity of the new requirement, and the lack of information on how to do student learning outcomes assessment, the Commission provided assistance through the creation of two books on the topic: *Student Learning Assessment: Options and Resources* and *Assessing Student*

Learning and Institutional Effectiveness. MSCHE aims to recognize and accommodate institutional diversity, as emphasized in a discussion with a representative of the Commission. To do so, the Standards have to be able to address the diversity while at the same time require for quality. For instance, even though the Commission expects program level learning goals, if an institution does not have programs, then, obviously, they cannot do assessment at this level (personal communications, July 30, 2009). The institution is supposed to consider the “spirit of the institution and the spirit of the accreditation standards” when preparing for the accreditation visit (MSCHE, 2006, p. viii).

While higher education continues to evolve and become more complex with various emerging technologies, MSCHE contends that it needs to be able to respond to these differences and not be prescriptive (personal communications, July 30, 2009). At the same time, it makes adjustments to its requirements. For instance, previously, institutions were asked for assessment plans, and the schools were developing extensive plans that took more time than actually doing assessment (personal communication, July 30, 2009). To help understand what was being asked, MSCHE added the *Fundamental Elements* provide an explication of the Standards (MSCHE, 2006, p. vi).

MSCHE provides workshops to help institutions better understand the requirements, and the Commission lists six points that assist in the assessment process: first, “read the directions; second, the “keep it useful”; third, “tie assessment to goals”; fourth, showing “direct evidence” for student learning; and fifth, using multiple measures for achieving the goals; and finally, “keep doing something everywhere and every year” (Suskie, 2009, ppt. sld. 27).

Assessment of student learning, according to MSCHE, is essential to accreditation because the educational process is what is being accredited at the institutions. MSCHE focuses

on the educational quality (personal communication, July 30, 2009). For that reason, the Standards on student learning ensure that institutions achieve their missions and goals. The MSCHE representative stated that the goal of MSCHE is to assure that institutions offer the appropriate amount of rigor, so that the students graduate with a college level education. Student learning outcomes assessment assists in that task (personal communication, July 30, 2009).

Often, institutions want to know exactly what assessment activities they need to undertake to ensure accreditation, much like a student who wants a sure path to an A in a course. The analogy that MSCHE gives to administrators is that assessment is often like teaching where some assignments require students to follow an exact guideline to meet the requirements, whereas other assignments ask for students to complete a project that aligns with their interest (personal communication, July 30, 2009). Institutional assessment should be the latter where institutions assess what matters to them. To this end, the Commission does not share “best practices” with the institutions, although it does offer workshops, and suggests books and conferences on assessment. As evinced by what MSCHE staff is seeing at the assessment workshops, institutions are asking different, more complicated questions now than they did in the beginning. This is significant as MSCHE has stressed that the assessment process itself is very important as it causes institutions to self reflect about what is happening with the teaching and learning on campuses. Institutions are expected not only to engage in assessment but *to use* the results in a way that is fitting to their missions. Assessment to improve student learning means that institutions not only collect the data but implement changes within about four years (personal communication, July 30, 2009).

The Spellings’ Report and the Reauthorization of the Higher Education Act in August 2008 not only affected institutions but also challenged the region “to continue to help each of

[their] members meet the appropriate student learning and other goals each sets for itself, consistent with its own mission” (MSCHE 2009, p. 15). The report and act have appeared to influence the institutions in the region, so that more understand the need to address student learning outcomes assessment. Even so, this type of change takes time (personal communication, July 30, 2009). As a means of addressing this issue, the following section outlines the standards that relate to student learning outcomes assessment.

Standards. MSCHE list 14 standards for accreditation in its *Characteristics of Excellence*. The first seven cover “institutional context” such as mission and goals, planning, resources, leadership, integrity, and institutional assessment. The second seven address educational effectiveness, including admissions and retention, student support services, faculty, educational offerings, general education, related educational activities, and the assessment of student learning. As evidenced by this list, two of the fourteen standards are dedicated to assessment. The first is Standard 7 (Institutional Assessment) which states:

The institution has developed and implemented an assessment process that evaluates its overall effectiveness in achieving its mission and goals and its compliance with accreditation standards. (p. 25)

The Commission emphasizes that this standard is a foundation for the other Standards, which require assessment of institutional effectiveness. It also suggests that this Standard seeks to answer these questions: “As an institutional community, how well are we collectively doing what we say we are doing?” and, specifically, “How do we support student learning, a fundamental aspect of institutional effectiveness?” (p. 25). Further, as student learning is the purpose of higher education institutions, assessing “student learning is an essential component of the assessment of institutional effectiveness” (p. 25). As one might expect, MSCHE has devoted an entire standard to student learning assessment. Standard 14 reads:

Assessment of student learning demonstrates that, at graduation or other appropriate points, the institution's students have knowledge, skills, and competencies consistent with institutional and appropriate higher education goals. (MSCHE, 2006, p. 63)

MSCHE presents the standard and then immediately provides *Context* for it. Moreover, two other additional subsets of information give institutions more depth of understanding how to assess student learning in sections called: *Fundamental Elements of the Assessment of Student Learning* and *Optional Analysis and Evidence*.

The first part of the context defines student learning outcomes assessment as “the third element of a four-step teaching-learning-assessment cycle” (p. 63), with the four steps referring to other standards. The first step is the development of clearly stated learning outcomes; the second step is the creation of courses, programs, and experiences that support the learning outcomes; the third step is the assessment of “key learning outcomes” (p. 63); and the final step is the use of the results to improve teaching and learning. The document explains that Standard 14 builds on three of the other Standards, including Standards 11 (Educational Offerings), 12 (General Education), and 13 (Related Education Offerings), “each of which includes assessment of student learning among its *Fundamental Elements*” (p. 63). All of these Standards—and Standard 14, in particular—encourage institutions to answer the question, “Are our students learning what we want them to learn?” (p. 63). In addition, Standard 7 (Institutional Assessment) monitors institutional effectiveness as it relates to aspects of institutional mission, vision, and strategic plans or goals, and also relates strongly to the assessment of student learning. Given this description, MSCHE expects institutions to define their learning outcomes as those that are central to the institutions' missions and to use documented results for institutional improvement.

Throughout Standard 14, descriptors emphasize assessment's importance to the accreditation process by using words such as expected, essential, and should; other language

points to the significance of assessment as well. As further evidence, take the following statements from Standard 14:

- “Student learning is at the heart of the mission of most institutions of higher education, the assessment of student learning is an essential component of the assessment of institutional effectiveness.” (p. 63)
- “Assessment is not an event but a process that is an integral part of the life of the institution, and an institution should be able to provide evidence that the assessment of student learning outcomes and the use of results is an ongoing institutional activity.” (p. 64)
- “Assessments should clearly relate to important goals, and improvements should clearly stem from assessment results.” (p. 65)

These statements highlight assessment and the use of assessment results for improvement.

As previously noted, MSCHE specifies that institutions define learning outcomes. The first step in the teaching and learning cycle, for instance, is the development of “clearly articulated written statements, expressed in observable terms, of key learning outcomes” (p. 64). In addition, the teaching and learning cycle should represent the “knowledge, skills, and competencies that students are expect to exhibit upon successful completion of a course, academic program co-curricular program, general education requirement, or other specific set of experiences” (p. 64). The first item of *Fundamental Elements of Assessment of Student Learning* indicates that there must be “clearly articulated statements of expected student learning outcomes at all levels (institution, degree/program, course) and for all programs that aim to foster student learning and development” (p. 66). Even so, MSCHE does not require or prescribe a certain type of learning outcomes assessment. Instead the institutions are responsible for both their own learning outcomes and their methods of measuring them (p. 64).

Although institutions have leeway to determine their own student learning goals and assessment strategies, MSCHE' Standards 11 and 12 guide these decisions. Standard 11 on Educational Offerings stipulates that:

The institution's educational offerings display academic content, rigor, and coherence that are appropriate to its higher education mission. The institution identifies student learning goals and objectives, including knowledge and skills, for its educational offerings.

Standard 12 on General Education lists general learning outcomes:

The institution's curricula are designed so that students acquire and demonstrate college-level proficiency in general education and essential skills, including at least oral and written communication, scientific and quantitative reasoning, critical analysis and reasoning, and technological competency.

These two Standards point to which learning outcomes should be defined and assessed.

Assessment strategies must directly document evidence of student learning, which could include "capstone projects, field experience evaluations, and performance on licensure examinations" (p. 65). In addition, indirect evidence of learning can be used to demonstrate student learning, for instance, "retention, graduation, and placement rates and surveys of students and alumni" (p.65). Importantly, direct evidence is defined as "clear, visible, and convincing evidence of student learning" (p. 65), so the focus of assessment is on these indicators. Evidence should be useful; cost-effective; reasonably-accurate and truthful; planned; and organized, systematized and sustained (pp. 64-67). MSCHE defines organized, systematized, and sustained assessment as those processes that are "ongoing, not once-and-done" (p. 65) and that have "clear interrelationships among institutional goals, program- and unit-level goals, and course-level goals" (p. 65). In other words, the assessments should connect to institutional goals and inform decisions for improvement. To this end, per the *Fundamental Elements of Student Learning*, the

assessment process should include the “use of multiple qualitative and/or quantitative measures” that:

- maximize the use of existing data and information;
- clearly and purposefully relate to the goals they are assessing;
- are of sufficient quality that results can be used with confidence to inform decisions;
- include direct evidence of student learning. (p. 66)

The call for direct evidence does not mean that institutions have to use quantitative data, but if the institutions use qualitative data, then they should do so systematically (personal communication, July 30, 2009). Even so, there is no prescription for institutions to choose one assessment type over another, for instance portfolios over standardized tests. Instead, the Commission lists a range of possibilities that could be used for institutional decision making.

Institutional improvement through student learning outcomes assessment is emphasized throughout of the *Context and Fundamental Elements* of the Standard 7 and 14, which emphasize that assessment is tied to the accreditation process because it helps answer the question, “Is the institution fulfilling its mission and achieving its goals?” (p. 64). The assessment of student learning, like the general assessment of the institution, provides a process to “improve student learning and otherwise advance the institution” (pp. 26 & 64). For that reason, “assessment results should also be used to evaluate the assessment process itself, leading to modifications that improve its relevance and effectiveness” (pp. 26 & 66). In the *Fundamental Elements of Educational Offerings* in Standard 11, institutional improvement as it relates to assessment is also foregrounded, especially in the call for

- periodic evaluation of the effectiveness of any curricular, co-curricular, and extra-curricular experiences that the institution provides its students and utilization of evaluation results as a basis for improving its student development program and

for enabling students to understand their own educational progress (see Standards 9: Student Support Services and 14: Assessment of Student Learning);

- assessment of student learning and program outcomes relative to the goals and objectives of the undergraduate programs and the use of the results to improve student learning and program effectiveness (see Standard 14: Assessment of Student Learning). (p. 44)

These statements address both institutional and program level improvement, as well as communication with students. In addition, MSCHE mission statement includes “quality assurance and improvement,” and one of the core values lists that MSCHE will have, “A continuous and seamless relationship with member institutions to promote continuous self-evaluation and institutional improvement” (MSCHE, 2010, para.1).

The disclosure of assessment information is not addressed in Standard 14, but Standard 6 under Integrity, particularly in the *Fundamental Elements of Integrity*, which says

information on institution-wide assessments available to prospective students, including graduation, retention, certification and licensing pass rates, and other outcomes as appropriate to the programs offered. (p. 23)

In MSCHE Policies, Guidelines, and Procedures the “Public Communication in the Accrediting Process,” states that “Accrediting agencies and institutions must demonstrate integrity in their actions and communicate clearly to the public not only their purposes, but also whether and how these purposes are being achieved” (MSCHE, 2004, p.1). The transparency demands from the 1970s mean that the Commission will share “essential information about its standards, its procedures, and the status of its constituents” (p. 1). Even so, the policy explains that the self-study and the evaluation are private. To this end, MSCHE encourages institutions to “hold themselves accountable for honest communication with the public on institution-related issues in which the public has a legitimate interest” (p.1) and contends that this public communication is a “matter of institutional integrity” (p.1). Institutions are asked to be honest in the process, and the

Commission has shared ways that institutions can become more transparent through workshops (personal communication, July 30, 2009).

The involvement of various stakeholders is addressed in the standards. First, faculty engagement with assessment, even if administrators are organizing it, is directly addressed in the description under Standard 14, which states:

The improvement of overall educational quality and the enhancement of effective teaching and learning is most likely to occur when faculty and administrators work together to implement a sound, institution-wide program of assessment. Because the faculty guide decisions about curriculum and pedagogy, the effective assessment of student learning is similarly guided by the faculty and supported by the administration. (p.66)

This statement points out that faculty should be directly responsible for the academic process as well as assessment. Moreover, the second *Fundamental Element* in Standard 14 lists the criteria for supporting an assessment program, including: “support and collaboration of faculty and administration” (p. 66). At this point, MSCHE maintains that faculty disengagement has not been an issue (personal communication, July 30, 2009).

In addition to faculty engagement, MSCHE expects for governing boards to receive “continuous updates” on the “institution’s mission, organization, and academic programs and objectives” (p. 16). Explicit involvement of governing boards in the assessment process is not mentioned. The role of the Governing Board is to ensure the quality of the institution (personal communications, July 30, 2009).

Important to note is that MSCHE does not request a “single, formal, polished document” because it worries that such a document will likely not be revised for reoccurring and continual revisions of the assessment process. According to the MSCHE, having “an effective process, clearly described to the community and the Commission” is more important than a “formal plan” (p. 5). MSCHE (2005) explanation of Standards 7 and 14 provides examples of ways that

institutions may want to document their student learning outcomes assessment (e.g. a chart or “roadmap” outlining assessment documentation, assessment documentation incorporated within the institutional strategic plan). This explanatory document also lists the items that the Commission may look for on a campus:

1. Do institutional leaders support and value a culture of assessment?
2. Are goals, including learning outcomes, clearly articulated at every level?
3. Have appropriate assessment processes been implemented?
4. Have appropriate assessment processes been planned?
5. Do assessment results provide convincing evidence . . . ?
6. Have the assessment results been shared in useful forms and discussed widely with appropriate constituents?
7. Have results led to appropriate decisions and improvements . . . ?
8. Have assessment processes been reviewed regularly?
9. Where does the institution appear to be going with assessment?
(MSCHE, 2005, pp.6-7)

These are the nine questions that an accreditation team will want to answer, so institutions are encouraged to think about them while preparing the self-study. Moreover, MSCHE provide a rubric is available that lists these same questions and is used to evaluate the campus program for institutional student learning assessment processes.

Student Learning Outcomes Assessment Resources. MSCHE webpage (www.msche.org) provides an extensive overview of its assessment activities, including publications and presentations on learning outcomes assessment, most notably guidelines for assisting with assessment, rubrics for assessment, lists of references of assessment articles and books, and links to accreditation resources. The site also includes events, programs and

workshops on topics such as *Fostering a Campus Culture of Assessment* and *Becoming an Assessment Facilitator*. In addition, the MSCHE Standards, *Characteristics of Excellence*, is available on-line. A staff member at the Commission said that MSCHE tries to create a culture that is focused on learning (personal communication, July 30, 2009). To this end, it often does evaluations during workshops, so that they can be improved upon. In addition, the programming for the annual meeting is driven by what the members want for the meeting.

Peer Review. The peer review process involves selecting a team to analyze an institution's self-study and to provide a recommendation to the Commission. The MSCHE Vice Presidents select team members from comparable institutions in the region. For instance, team members from community colleges review other community colleges. The team always includes someone who could be defined as an expert with assessment as defined by their position or experience at their home campus (personal communication, July 30, 2009). MSCHE suggests that institutions should see the team as a group of consultants (Personal communication, July 30, 2009). At the end of the campus visit, the team writes a report that is then presented to the institution's president and whichever constituents she would like to include from the university community.

Accreditation Actions. Because MSCHE is increasing the rigor for which it addresses the Standards, it is issuing more follow-ups (personal communication, July 30, 2009). Often the follow-ups are designed to actually assist the school to become in compliance. Assessment has been a key factor for institutions receiving warnings, probation, or, in one case, losing accreditation. In 2009, MSCHE did not renew an institution's accreditation status for the first time in twenty years. One of the main reasons that the institution did not get accredited was due to a lack of evidence that students were meeting the learning goals of the institution. However,

student learning assessment was one of many reasons (personal communication, July 30, 2009).

About 2/3rds of MSCHE institutions are being asked for follow up because of assessment. While some institutions have follow-ups, others have additional peer visits.

All of MSCHE decisions can be found on its website, as required by the transparency policies implemented in the 1970s. In November 2009, the Commission made decisions on six institutions that had submitted self-studies in the previous year. Four of them had to provide a letter or report in either the fall of 2010 or fall of 2011 because of lack of student learning outcomes assessment information, and one of the four, the institution will have another visit after the five-year periodic review report. Examples from some of these requests related to student learning outcomes assessment include:

To reaffirm accreditation and to request a progress letter, due by October 1, 2011 documenting: (1) additional steps taken to continue development and implementation of a documented, organized, and sustained process for assessment of student learning, and (2) evidence that student learning assessment information is used to improve teaching and learning (Standard 14). The Periodic Review Report is due June 1, 2014.

To reaffirm accreditation, to commend the institution for progress to date and the quality of the report, and to request a monitoring report, due by September 1, 2010, . . . (3) the establishment of measurable learning goals at the institutional and program levels, appropriate to institutional mission (Standard 14); and (4) the use of appropriate assessments for and evidence of progress in the attainment of learning goals at the institutional and program levels (Standard 14). A visit will follow submission of the report. The Periodic Review Report is due June 1, 2014.

To reaffirm accreditation and to request a monitoring report, due by November 1, 2011, documenting (1) the development and implementation of a comprehensive, organized, and sustained process for the assessment of institutional effectiveness with evidence that assessment information is used in budgeting, planning, and resource allocation (Standard 7), and (2) the use of direct evidence of student learning at the institutional and program levels to improve student learning and institutional effectiveness (Standard 14). The Periodic Review Report is due June 1, 2014.

The information in these examples illustrates the Commission's level of engagement with assessment and persistence to assure that institutions comply.

The Commission finds that sometimes institutions are providing an excellent education, but are not assessing what they are doing, and at other institutions there are pockets of activity related to assessment, but that assessment is not spread throughout the institution. At this point, it appears that many institutions have assessment results, but they have not begun to use them (personal communication, July 30, 2009). The 5 year reports that institutions provide cover three things: finances, planning and assessment, so institutions must respond to assessment practices every five years. Despite the assistance that MSCHE provides its members, survey responses from its members still point to the struggle that they are having with the assessment standards, especially as the Commission is expecting more compliance (personal communication, July 30, 2009).

Summary. MSCHE is a region with a diverse group of institutions. Transparency has been an issue for MSCHE since 1978, so all accreditation decisions are posted publicly. In 1996, a commitment to student learning outcomes assessment began, and not quite ten years later a staff member was hired to assist with the learning outcomes assessment activities. Standards 7 and 14 are dedicated to Institutional Assessment and Assessment of Student Learning, respectively. The Commission appears to be focused on finding out if an institution's students are indeed learning what the institution sets out for the students to learn, so the assessment strategies are expected to be directly connected to the identified learning goals. Since faculty are involved in the teaching and learning process at an institution, they should be involved in the assessment process. Also, the students are mentioned since assessment is supposed to be provided to them as a way to understand the learning process. In addition, the Commission emphasizes the use of assessment for institutional improvement. MSCHE offers various training materials and opportunities through its website, workshops, and annual meeting.

New England Association of Schools and Colleges Commission on Institutions of Higher Education (NEASC-CIHE)

The [NEASC] Commission develops, makes public and applies criteria for the assessment of educational effectiveness among institutions of higher education leading to actions on their institutional accreditation. By this means, the Commission assures the education community, the public and interested agencies that accredited institutions have clearly defined objectives which meet with criteria published by the Commission; that they have the organization, staffing and resources to accomplish, are accomplishing and can continue to accomplish these objectives. In addition, through its process of assessment, the Commission encourages and assists in the improvement, effectiveness and excellence of affiliated educational institutions. (NEASC-CIHE, n.d)

This mission statement provides an overview of the NEASC organization. NEASC also provides a list of activities that fulfill its mission, and two of these activities implicitly address efforts for student learning outcomes assessment. The first notes NEASC's goal to "encourage and participate in efforts directed toward the study of current issues related to the evaluation and improvement of educational institutions," and the second points toward a more introspective model of self-evaluation, in which the activities of the Commission, "including its criteria and standards" come under scrutiny in order "to assure itself and others relying on its efforts that the Commission fulfills its purposes to the greatest extent possible" (NEASC, 2003, p.2).

Demographics. This accreditation organization, headquartered in Bedford, MA accredits institutions in New England including Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. In addition to these United States institutions, NEASC also accredits two institutions in Greece, three in Switzerland, and one in Bulgaria; and has candidate institutions in Greece, Bermuda, and Lebanon. The staff categories are the same in NEASC as with the other accreditation agencies; NEASC has a twenty four person Commission, a nine-person staff, one of which has a strong background in assessment, and peer evaluators.

This region has a culture that emphasizes independence that aligns with the ethos identified in several state mottos in the region: Connecticut "Land of Steady Habits" and New

Hampshire “Live Free or Die.” Due to its small size and relatively uniform culture, “New England is a region in a way that other places are not” (personal communication, July 29, 2009). Likely this is because “the New England states are bound together in a myriad of ways that other regions are not consistently, from governors councils, New England Board of Higher Education, museum titles (New England Aquarium), sports teams (New England Patriots), and so on” (personal communication, March 1, 2010). The people of New England also have “a lot of confidence in education” (personal communication, July 29, 2009). Many of the strong institutions in the region are long-established, private and independent (such as Harvard University, Yale University, Dartmouth College, and Brown University). When people think of New England, they often think of these private colleges and institutions more so than the public ones. Plus, NEASC has over 60% private institutions, which is much higher than the other regions. Unlike other regions, NEASC does not have any large systems offices. The Commission works with a diverse set of institutions with diverse missions but has one set of standards.

Background. The New England Association of Schools and Colleges was founded in 1885, making it the oldest of the regional accreditors. Even so, it did not formally begin to accredit institutions until the members agreed to do so in December 1952 (Blewett, 1959). The organization originated when a group of secondary school administrators joined with higher education leaders to establish a set of admission requirements for college, namely because each college was perceived to go its “proud individual way” and thereby contribute to “educational chaos” (Blewett, 1959, p. 46). The participants who attended the meeting established the Association and agreed to promote “the calls of liberal education by the promotion of interests common to both colleges and preparatory schools” (p. 46). In fact, during these early days of the 1910s and 1920s, NEASC held several annual meetings that gathered the members of secondary

and tertiary educators to provide “professional development and curricular advocacy roles for its members” (Ewell, 2009a, p. 22). The central theme of the meetings was typically the promotion of liberal education.

As an entrée into accreditation, colleges began in 1928 to “hold formal membership” which was based on fulfilling certain institutional standards. However, the Commission was “reluctant to assume the functions of an accrediting body and treated the standards as advisory only” because the “institutions in the region have cherished their individualism, which has been an unmistakable unwillingness to be subjected to the critical scrutiny of outsiders” (Blewett, 1959, p. 48). Other regions were offering accreditation and would only recognize students’ credits or degrees from accredited institutions. This problem with credit transfer led the NEASC membership to reconsider the issue and, in 1952, members decided to begin accrediting institutions, though not without controversy (Blewett, 1959). Because the Commission knows it is unlikely that certain highly regarded institutions will lose accreditation, its

goal is to make the accreditation experience useful in two ways to these institutions, and indeed to all institutions: First, to work with institutions so that the self-study can advance the institution’s agenda, and second to send them a team of peers whose opinions they want to hear and whose feedback they will value, based on the Commission’s standards and their self-study. (personal communication, July 29, 2009)

Accreditation and student learning outcomes assessment are taken “very seriously,” even by “some of the household name institutions that have gone through the process” (personal communication, July 29, 2009). According to NEASC representatives, the Commission is “conservative in its accreditation model, using the classical ten-year cycle of a single set of standards, a self-study, and a visit by peers” (personal communication, July 29, 2009). For the comprehensive evaluation, the Commission tries to accommodate the “rhythm of the institutions, rather than impose one” (personal communication, July 29, 2009). It asserts that accreditation

should not feel like something separate, but that it works with what you are doing, for example as in part of the strategic planning effort. As a part of a self-study one institution could gather data for a strategic plan while another institution might use the self-study to see how the strategic plan is working. (personal communication, July 29, 2009)

The Commission's intended role is to make its expectations clear and to allow for the members to learn from each other as well as from experts (personal communication, July 29, 2009).

Student Learning Outcomes Assessment Information. The staff of the Commission offered this history of assessment: in the NEASC region, assessment began in 1992, with a policy statement on institutional effectiveness. At the same time, an assessment expert was added to the staff to provide guidance and workshops on assessment. In 2003 the standards began to be revised, and the new standards place “emphasis on what and how students are learning. The Commission pays attention to the what, but also emphasizes the how” (personal communication, July 29, 2009). The standards went into effect in 2006; these standards make the expectations related to student learning outcomes “much clearer for institutions,” particularly by combining the policies with the standards (personal communication, July 29, 2009). Previously, they were two separate documents, which caused confusion on the part of institutions. According to NEASC staff, no one thought that the shift to student learning outcomes assessment was “off base or wrong,” and even though the “faculty have been slower to come along, the academic leadership or institutional leadership has not been a problem” (personal communication, July 29, 2009).

Over the last decade, institutional responses to student learning outcomes assessment have evolved. At first, institutions' stated assessment efforts included attending NEASC workshops and meetings, and having assessment plans; now, institutions say that they are perhaps not doing assessment “across the board,” but they are “assessing, gathering data, and using it” (personal communication, July 2009). That means they are following the requirements

of the accreditation process. Campuses use the data gathered from the assessments to change courses and their sequencing, advising, and curriculum.

Part of the reason for this progression is the standards, but there are “many other rivers” besides NEASC, such as specialized accreditation and state initiatives (for instance, Massachusetts’ teacher test scores)” (personal communication, July 29, 2009). While there is “an increase of activity when the institution is getting ready to submit the self-study,” NEASC representatives state that it does not see this happening with the “same intensity” as before; now the effort is more continuous (personal communication, July 2009). The Commission is now trying to “complicate the message” by asking institutions to use the data to support a narrative of what is happening on the campus stemming from assessment. The chief focus of the student learning outcomes assessment is “to find out what are the students gaining and to use the results for improvement” (personal communication, July 29, 2009). According to staff at the Commission, it would like for the institution to address the question, “*How* are students learning?” It is easier to talk about what students are learning than it is to discuss how they are learning, but that is the challenge for the institutions. A staff person asserts that “A focus on how students are learning supports using the results of assessment for improvement” (personal communication, March 1, 2010).

The Spellings’ Report called for student learning outcomes assessment, and NEASC wanted to “respond in a way that was genuinely responsive to assessment and measures of student success” (personal communication, July 29, 2009). At the same time,

the Commission was having its own frustrations with institutions that did not write about assessment in the self-study. Typically, such institutions would mention in their self studies that they were administering NSSE or having their students complete portfolios, but mission was what they discovered about what students were learning or how they used the information for improvement. (personal communication, July 29, 2009)

For that reason, in August of 2008, NEASC adopted an initiative building on the Policy Statement on Student Achievement and Success that pulls together all of the standards related to student learning outcomes assessment. This initiative was not included in the self-studies until Spring 2009. The Policy Statement on Student Achievement and Success advances an initiative with two parts: first, Making Assessment More Explicit (The E-series) and, second, Documenting Student Success (The S-series). The E-series requests that institutions “select and declare their basic approach to assessment and to summarize their findings” (NEASC, 2008, p. 1). The Commission lists four possible alternatives, and though institutions may create their own alternative, they must contact the Commission for approval. These alternatives are

1. An inventory of program assessment and specialized accreditation
2. The Voluntary System of Accountability (VSA) plus program review
3. Statement of claims for student achievement with supporting evidence
4. Comparison to peers on measures of student achievement and success (p. 1).

For the S-series, institutions provide their data on retention and graduation rates as well as other measures that fit with the institutions’ missions. As a means of assistance, institutions are given forms for documenting this information, which are filled out during the 5 year report and the 10 year comprehensive review. The initiative is meant to be “mission-sensitive,” meaning that the types of information collected would allow a diverse set of institutions to demonstrate success in ways that fit their mission. The Commission hopes that the initiative will promote creativity as well as institutional improvement (NEASC, 2009a, p. 10).

Institutions appear to find the forms helpful and some are using for institutional data gathering beyond what is expected for accreditation (personal communications, July 29, 2009). The forms tell them “what exactly needs to be done” while providing a way to track progress and

talk to departments and individual units (personal communication, July 29, 2009). The forms provide more specificity than the Standards, and provide a way for institutions to start their self-study process with the data. At the same time, they offer an element of choice, which NEASC hopes will allow the institutions to make the process align with their missions and interests. Moreover, the Commission explains that part of the process is finding out what you are not doing because fostering an “understanding that [institutions] are not doing as much here as [they] thought” is just as important as finding out what institutions are doing (personal communication, July 29, 2009). The Commission emphasizes that candor is a key element for these forms. The forms give the institutions a way to tell the Commission: “This is what we do well. We don’t do other things particularly well, but here is how we are going to do to address it” (personal communication, July 29, 2009). The forms also help institutions to look at their goals and their future assessment needs by having institutions write about their projects for the coming years. At this point, “most institutions do better on the left than on the right side of the E form” (personal communication, July 29, 2009). The left portion of the E form asks about the development of formal learning outcomes, while the right asks about changes made due to assessment data and last program review.

Another new initiative, starting in Spring 2010, “Data First” links assessment expectations within institutional effectiveness. For this initiative, forms are provided the avenues for institutions to look at the evidence and then write about it. Embedded in these forms are the E and S forms discussed above. Some institutions collect this information annually or biannually in order to facilitate the process during review years. An NEASC staff member identified another shift: “Before there was the self-study, and then data forms, now [NEASC] is trying to get the institutions to retrieve the data first and then use it as a basis from which to write the report”

(personal communication, July 30, 2009). While institutions are successful at gathering data, they are challenged by describing how they use data, said a NEASC staff member.

According to NEASC staff, student learning outcomes assessment has advanced in this region for several reasons: first, the inclusion of an assessment expert on the staff; second, strong standards, including clear requests in standards and assessment measures embedded throughout the standards; third, the flexible structure of the E and S forms; fourth, the staff's dedication to assisting institutions; and fifth, an annual meeting with a whole day of workshops. Academic administrators in the region have told NEASC that they appreciate that the standards require student learning outcomes assessment because they can leverage accreditation with the specific goals of implementing and sustaining assessment on the campus.

As an example of a successful college in the region is an urban community college. This college examined student registration, specifically the combination of courses that individual students were taking and the sequencing of those courses. Analyzing this type of data led to strategies that allow for students to be more successful or, one could say, institutional improvement. In many cases, NEASC finds it "hard to show this type of information, because it has been hard to redact it and not expose the identity of the institution" (personal communication, July 29, 2009). NEASC sees great potential in sharing concrete examples and thereby allowing institutions to learn from one another. To this end, the Commission plans to expand its website to offer more content of this type.

Standards. The NEASC *Standards for Accreditation* (NEASC, 2005) include Mission and Purposes, Planning and Evaluation, Organization and Governance, The Academic Program, Faculty, Students, Library and Other Information Resources, Physical and Technological

Resources, Financial Resources, Public Disclosure, and Integrity. All eleven of the Standards require institutional quality. The *Standards for Accreditation* read:

In applying the Standards, the Commission assesses and makes a determination about the effectiveness of the institution as a whole. The institution that meets the Standards:

- has clearly defined purposes appropriate to an institution of higher learning;
- has assembled and organized those resources necessary to achieve its purposes;
- is achieving its purposes;
- has the ability to continue to achieve its purposes. (NEASC, 2005, p.1)

This overview connects the standards to the missions of the institutions and purports to judge institutions by their current, as well as future, abilities to meet their stated goals. Moreover, under Standard 2 (Planning and Evaluation), an institution is expected to “regularly and systematically” examine the effectiveness of its mission and purpose, with a focus on educational objectives, while providing “relevant and trustworthy information to support institutional improvement, with an emphasis on the academic program” (NEASC, 2005, p.4). Institutions should use both quantitative and qualitative methods. According to Standard 2.6, the evaluations allow the institution to show what is attained through the educational process and to use the results for improvement and institutional planning.

Standard 4 on The Academic Program addresses student learning, including:

The institution’s academic programs are consistent with and serve to fulfill its mission and purposes. The institution works systematically and effectively to plan, provide, oversee, evaluate, improve, and assure the academic quality and integrity of its academic programs and the credits and degrees awarded. The institution develops the systematic means to understand how and what students are learning and to use the evidence obtained to improve the academic program. (NEASC, 2005, p.7)

While this standard gives a broad understanding of what is expected, the subcategories under Standard 4 address student learning outcomes assessment more directly, as in Standard 4.4:

The institution publishes the learning goals and requirements for each program. Such goals include the knowledge, intellectual and academic skills, and methods of inquiry to be acquired. In addition, if relevant to the program, goals include creative abilities and values to be developed and specific career-preparation practices to be mastered. (NEASC, 2005, p.7)

This statement obliges institutions to list “goals and requirements” for every program or department, meaning that student learning goals must be defined and documented. A further subsection of the Standard, 4.5, relates to the expected quality of these programs: “Degree programs have a coherent design and are characterized by appropriate breadth, depth, continuity, sequential progression, and synthesis of learning” (NEASC, 2005, p.7).

Sections 4.44 through 4.50 of Standard 4 specifically relate to the assessment of student learning. The first of these includes:

4.44 The institution implements and supports a systematic and broad-based approach to the assessment of student learning focused on educational improvement through understanding what and how students are learning through their academic program and, as appropriate, through experiences outside the classroom. This approach is based on a clear statement or statements of what students are expected to gain, achieve, demonstrate, or know by the time they complete their academic program. The approach provides useful information to help the institution understand what and how students are learning, improve the experiences provided for students, and assure that the level of student achievement is appropriate for the degree awarded. Institutional support is provided for these activities. (NEASC, 2005, pp. 12-13)

Once more, the Standards call for the clear delineation of what students from each academic program should know. Additionally, Standard 4.49 explains that the institution must provide students with “systematic, substantial, and sequential opportunities to learn important skills and understandings” that allow them to engage with their discipline or profession and, moreover, that those experiences should be supported with “regular and constructive feedback designed to help them improve their achievement” (NEASC, 2005, p. 13). These subsections of the Standard emphasize that institutions must implement, support, and use assessment data in a systematic way. Similar language recurs throughout the other learning outcome assessment standards,

usually centering on “what and how students are learning, with the idea that understanding how students are learning is an important key to improvement” (personal communication, July 29, 2009).

Student learning must be understood at the course, program, and institutional levels, according to Standard 4.45. Standard 4.18 speaks specifically to the skills with which students must graduate, including written and oral communication in English, scientific and quantitative reasoning, a capacity for continuous learning, “knowledge and understanding of science, history and social phenomena; and, knowledge and appreciation of the aesthetic and ethical dimensions of humankind” (NEASC, 2005, p. 13). Related views are reiterated throughout the *Standards for Accreditation*, including in Standards 6.6 (institutions must have “measures of success appropriate to their mission”), 7.8 (students must use information resources and technology “attaining levels of proficiency appropriate to their degree and subject or professional field of study”) and 4.7 (students must also have college-level English language skills upon graduation) (p. 17 and 20).

Methods of assessing student learning are both qualitative and quantitative, as stated in Standard 4.50. The Commission expects institutions to present evidence that shows not just a range of qualitative and quantitative data but the use of both indirect and direct assessment measures (personal communication, July 29, 2009). NEASC staff says it are moving past the “more is better” approach and telling the institutions to focus their efforts on the measures that give them the best, most information (personal communication, July 29, 2009). If an institution tries a method that does not work, NEASC says, institutions can explain that the process did not work and why it did not. Understanding that selecting measures is only one part of the process, NEASC representatives explain that evidence can be found across institutions and is not limited

in institutional research offices. In their view, the types of measures used matter less than the fact that data is used and the Commission emphasizes that institutions should be “candid with the Commission about what the data shows” (personal communication, July 29, 2009). NEASC suggests that institutions consult the WASC’s Evidence Guide (WASC-ACSCU, 2002) to think about data usage.

As discussed above, The Policy Statement on Student Achievement and Success assists in organizing institutional assessment efforts by first, Making Assessment More Explicit (The E-series) and, second, Documenting Student Success (The S-series). While NEASC does not proscribe exact ways to organize the assessment process, the E-series and S-series forms demand specific types of data, and Standard 4.50 points to the fact that institutions may use quantitative and qualitative methods such as “including understanding the process of learning, being able to describe student experiences and learning outcomes in normative terms, and gaining feedback from alumni, employers, and others situated to help in the description and assessment of student learning” (p. 13). In addition, the institution must ensure that its method of assessing student learning is “trustworthy and provides information useful in the continuing improvement of programs and services for students” (p. 13).

NEASC expects institutions to use assessment information for improvement and to support the mission of the institution. This expectation is repeated in the standards in the following phrases: “. . . help the institution understand what and how students are learning” (p. 13, Standard 4.44), “. . . statements are consistent with the institution’s mission” (p.13, Standard 4.46), “. . .evaluation endeavors and systematic assessment are demonstrably effective in the improvement of academic offerings and student learning” (p. 13, Standard 4.51), “. . .evaluation are used systematically for improvement and to inform institutional planning” (p.4, Standard

2.6), and “institutions goals . . . reflect institutional purposes . . . results are used to inform . . . review of programs and services” (p. 17, Standard 6.6). The need to align goals and learning assessment with the mission and institutional improvement is present throughout the document as represented in the fact that each standard includes an Institutional Effectiveness statement.

NEASC’s Standard 4.4 states that learning goals are to be published, Standard 10.10 requires that the institution publishes its learning goals for students, and Standard 10.12 says that the “institution has readily available valid documentation for any statements and promises regarding such matters as program excellence, learning outcomes, success in placement, and achievements of graduates or faculty” (p. 26). Recently, NEASC has undertaken multiple activities to foster transparency; including emphasizing it in the Spring 2009 Evaluator Workshop Manual (NEASC, 2009a, p. 5) and having staff examine institutional websites for student learning outcomes assessment information. The latter found information that institutions provided listed the following on their web pages: “Retention and graduation rates, what do graduates do?, licensure passage rates, transfer students, student experiences as undergraduates, and other public disclosures on student success (such as VSA, UCAN, NSSE, etc)” (NEASC, 2009b, p. 1).

NEASC staff members explain that “more institutions are moving towards making student learning outcomes assessment information public” (personal communication, July 29, 2009). However, some institutions do not “share the information internally, so they do not think to share it externally” (personal communication, July 29, 2009). The Commission does “talk about what do you see and what do different aspects of the institution see when they look at data? How it’s used, how it’s publicized, and how is it talked about?” (personal communication, July 29, 2009)

Expectations for faculty with regard to learning outcomes assessment can be found in three areas of the standards. First, faculty must have a “substantive voice in matters of educational programs, faculty personnel, and other aspects of institutional policy that relate to their areas of responsibility and expertise” (p. 6). Next, faculty are directly involved with “understanding what and how students are learning and using the results for improvement has the support of the institution’s academic and institutional leadership and the systematic involvement of faculty” (p. 13). Finally, faculty have a responsibility for the “. . . instruction and the systematic understanding of effective teaching/learning processes and outcomes in courses and programs for which they share responsibility” (p. 14).

The 2006 revisions to the standards addressed the role of faculty specifically, and Standard 5.3, in particular, has become a “leverage for academic administrators: it’s not just teaching, it’s not just research, it’s not just service, you can’t say that I am not hired to do that—it’s right here” (personal communication, July 29, 2009). Even so, NEASC explains that

faculty had the most resistance to the shift to student learning outcomes assessment and were slow to come, and one may still say slow to come, though there has been a lot of progress over the last couple of years. The whole issue of faculty resistance is not a topic; there are many levels of engagement. Faculty must be involved with assessment for it to work.

Representatives at NEASC said that it cannot think of an institution that is putting forth assessment without faculty involvement and that, in fact, “faculty involvement is much better than it used to be” (personal communication, July 29, 2009).

As for governing boards, NEASC calls in Standard 3.3 for them to have an understanding of the institution’s mission and priorities and to ensure these priorities are being evaluated periodically (p. 5). The Standard does not address board involvement with student learning in a direct way, but given that student learning is tied so closely with the mission throughout the rest

of the document, it does appear to require board involvement, if only implicitly. While NEASC does not have specific assessment related requirements for governing boards, every accreditation letter also goes to the chair of the board.

Student Learning Outcomes Assessment Resources. The NEASC web page (<http://cihe.neasc.org/>) provides several resources for student learning outcomes assessment, including Assessment Forum documents, the Policy Statement on Student Achievement and Success, the Policy Statement on Institutional Effectiveness, *Becoming More Explicit in Looking at Student Success, Focusing on Outcomes: Some Examples*, and *Sample Measures for Student Achievement and Success*. The Commission also offers information that is not specifically its own, such as CHEA reports, documents from other regions, C-RAC documents, and internet resources on assessment of student learning. In addition to these resources, the *Standards for Accreditation* (NEASC, 2005) lists the requirements for student learning outcomes assessment.

The Annual Meeting/CIHE Assessment Forum is another avenue for communication. The meeting clearly focuses primarily on the assessment of student learning and, according to its website, including numerous presentations on various aspects of assessment. NEASC also offers workshops for evaluators and chairs as well as for institutions preparing for self-study. At such workshops, the NEASC staff shares resources based on experiences with various campuses, including *Good Examples of Candor About Assessment Results*, *Closing the Loop Activities*, *Sample Measures of Student Achievement and Success*, and sample completed E and S forms.

While NEASC offers information about noteworthy assessment practices, NEASC has “stayed away from listing best practice institutions” (personal communication, July 29, 2009), out of concern that other institutions might simply shift their practices to match the “best

practices” even if those institutions have very different cultures and goals. The Annual Meeting even consciously highlights “many different institutions with different perspectives, so that people don’t think that one institution is what the Commission wants.” In addition, the Commission “decided not to run an assessment school, per se, because it would put the Commission in the position of teaching institutions how to do something and then coming in and grading them on how well they did it.”

The Commission finds that institutions want to learn what other institutions are doing, so a Commission goal is to develop ways to connect institutions (personal communication, July 29, 2009). Rather than offer workshops, it would provide ways for institutions to present to each other on certain topics, i.e., portfolios. Then, the Commission would be away from espousing and would have a way that [the Commission] would be comfortable while meeting [their] expected needs.” It is important to note that several regional professional groups have meetings on assessment, so the region’s small sized allows for institutions to easily network and participate in these regional professional development events.

Peer Review. An institution’s accreditation relies on a team of five to ten people from peer institutions reviewing the institution’s self-study, visiting the campus, and writing a report about the campus. Team members often have expertise “aligned with the standards, such as a faculty member, library staff, chief information officer, student service officer, academic administrator, occasionally a board member, and so on” (personal communication, July 29, 2009). While the teams receive training, NEASC does not create a group of expert evaluators but instead invites many types of institutional associates to participate in the process. Of this practice, NEASC representatives say, “There may well be something lost in building that expertise, but there is certainly something gained in terms of having more people understand the

process” (personal communication, July 29, 2009). Most of the team members come from the region, but for high profile, specialized, or urban institutions, NEASC selects appropriate team members from outside the region “to get enough disinterest. The outsiders are selected to provide objectivity, since certain types and sectors in the region know each other very well.” NEASC relies on teams that have members with expertise in individual areas rather than assessment experts who are expected to be knowledgeable in all of the areas covered by the standards. The team also consists of people with background and expertise that will be “valued by the institution being visited” (personal communication, July 29, 2009). It is important to note that while the staff trains and sometimes has conference calls with the team during the visit, the staff does not go on the visit. NEASC grants the team full autonomy—once the team “steps on the campus, they are on their own” (personal communication, July 29, 2009).

Accreditation Actions. Letters to institutions frequently mention assessment as an item for follow-up through a progress report or the fifth year interim report. Typical language calling for interim reports says that institutions must address their success in “continuing to implement a comprehensive approach to the assessment of student learning” and “developing and implementing useful means of assessing student learning and other areas of the academic program not subject to specialized accreditation” (NEASC, confidential letters). Beyond this language, the letters specifically note where an institution is failing to meet the criteria set by the standards. These letters show that institutions must take the NEASC requirements for accreditation seriously.

NEASC does not set a 10-year term for accreditation. Still, most institutions only have to do a complete self-study once every ten years. If institutions are simply at the data collection level but not doing anything with the data, they are asked follow up, but no institution has been

put on probation without a sufficient period to implement assessment. At the same time, in the comprehensive evaluations, 80% of institutions have been asked for follow-up on assessment either in the 5th year or during the comprehensive visit, and that number is increasing (personal communication, July 29, 2009). The Commission can ask for a progress report on any schedule. If it seems like the institution understands the requirements, the Commission will ask for it in 5 years. Presidents of institutions meet with the team chairs at least once in the ten year cycle, so the Commission “can tell if the institution gets it or has its suspicions confirmed, which may be why there are not more recommendations” (personal communication, July 29, 2009). The Commission states that “there are maybe 20 institutions (less than 10%) that the Commission sees a lot; and another 20 that we might see once or twice in that ten years and the rest fall somewhere in between” (personal communication, July 29, 2009).

The Commission staff writes the letters based on the reports and the Commissioners’ recommendations, and in so doing it assists the institution in knowing how to stay in compliance. In one letter, dated December 2007, the Commission continued an institution’s accreditation, but asked for a report in Spring 2010 giving “emphasis to its success in developing and implementing a comprehensive approach to the assessment of student learning at the course, program, and institutional level and using the results for improvement” (confidential letter, 2007). The institution was also asked that the fifth-year interim report include evidence of “continuing to implement a comprehensive approach to the assessment of student learning and using the results for improvement,” among other items. The letter then “takes favorable note” of the institution’s department review process and its “nascent efforts to assess student learning.” Then, again, the letter asks for “specific evidence about institutional effectiveness” with

particular emphasis on the assessment of student learning . . .” In concluding, the letter points out the exact wording of the standards.

In another letter, dated April 2008, an institution was reaccredited but was asked to produce a progress report in Fall 2009, “analyzing retention and graduate rates, distinguishing among [various levels of degrees and delivery formats], and using the results for improvement” and “developing and implementing useful means of assessing student learning and other areas of the academic program not subject to specialized accreditation.” In one instance, an institution was asked “to do a progress report within one year on assessment. They were smarting because they never had to do one before, nor had their peers, so this works through time” (personal communication, July 29, 2009).

The Commission maintains that consistency across the institutions is necessary. The Commission often sees that

in the reports you can get some indication of changes, and there’s a reasonably a lot of information on process, but the links are not there and there’s a strong reticence on sharing the data. Data that would be sensitive to prompt an institution to make changes is hard to see in the reports. They will say they did assessment, they will indicate that they made some changes, but they won’t indicate the specificity of the findings of the assessment; we are working hard to try to get more candor in that regard.

While the Commission emphasizes candor, it understands that candor is difficult for institutions. Even so, NEASC representatives are encouraged to ask institutions “what have you learned” knowing that there is as much to be gained from learning what worked as what did not work (personal communication, July 29, 2009).

Institutions with strong business, engineering, and health schools have strong assessment activities in place, according to NEASC. However, NEASC is “not willing to say that liberal arts institutions are not meeting expectations of academic quality in assessment terms. It is not that they are not meeting the standard of academic quality even though they may not be doing

assessment well enough” (personal communication, July 29, 2009). At this point, the Commission takes the approach: “let’s put reasonable things in front of [the institutions], and let’s send teams that can help them along. It is not as if the institutions are not doing assessment.” Assessment is just one part of what is looked for in the accreditation process. The team also looks at four or five other items, such as finances, capacity, and leadership.

Summary. The region of New England, with its propensity for independence and its significant number of private institutions, strongly influences NEASC. Assessment began at NEASC in 1992 when institutional effectiveness was added to the standards and when an assessment expert was hired, and the role of assessment for student learning was strengthened in the 2006 Standards. In particular, student learning outcomes assessment requirements are in the fourth Standard. Ten years ago, institutions were providing assessment plans, and now the expectations are for institutions to be actually assessing student learning and using that assessment information for improvement. Faculty involvement is required by this Commission as it is the faculty that can assist in understanding the fundamental question of “what and how are students learning?” The Commission has moved away from providing workshops throughout the year, and focuses most of its training efforts for assessment during its annual meeting. NEASC also places a priority in having the institutions learn from each other.

North Central Association of Colleges and Schools, The Higher Learning Commission (NCA-HLC)

The NCA-HLC stated mission is “Serving the common good by assuring and advancing the quality of higher learning” (NCA-HLC, 2000, p. 1). To this end, the Commission envisions itself as becoming an organization

known for its distinctive strengths of integrity, flexibility, creativity, responsiveness, and risk taking, and for its commitment to work for the common good of society. Its transformed accreditation processes and its broadened range of services will support affiliated organizations in meeting new regional, national, and international expectations for higher learning. (NCA-HLC, 2000, p. 1).

NCA-HLC aims to pursue this goal by developing “new ways to work in partnership with stakeholders from higher education and the public to foster a culture of assessment, provide essential resources to members, and maintain an environment and ethic of accountability” (NCA-HLC, 2000, p. 1). By understanding the changing culture of higher education and allowing for institutional diversity and creativity, the Commission intends to foster learning organizations.

Demographics. This accreditation organization, headquartered in Chicago, Illinois, once called the North Central Commission on Higher Education is now called the Higher Learning Commission (HLC). It accredits over 1100 institutions in the NCA-HLC region that includes Arkansas, Arizona, Colorado, Iowa, Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, North Dakota, Nebraska, Ohio, Oklahoma, New Mexico, South Dakota, Wisconsin, West Virginia, and Wyoming. This accrediting organization accredits 26% of U.S. higher education institutions that are regionally accredited. Given the size and the large region for this accreditation agency, the institutions accredited are very diverse, and few generalizations across the region emerge. Yet it is important to note that many of the large, public institutions of the country reside in this area, such as the state flagship institutions in Michigan, and Ohio. In

addition, some of the largest community college systems are also in this area, such as those in Illinois and Arizona.

Background. In 1895, representatives from thirty-six educational institutions convened at Northwestern University to discuss the creation of a partnership among educational leaders in the area, and by so doing founded the North Central Commission for Accreditation (NCA-HLC, 2003, p.1. 1-2). By 1913, the Commission had begun to examine the quality of these institutions, leading to accreditation at both the secondary and tertiary levels. The early standards were explicit and included such information as the minimum amount of an endowment (\$200,000) and the maximum number of students in a laboratory class (30 students). This quantitative method of examination was intended to encourage order and common goals among the institutions. Beginning in the 1920s, the standards changed to allow for “legitimate experimentation and constructive change” (NCA-HLC, 2003, p.1.1-3). By 1934, institutions’ “own self-declared purposes—as long as these were appropriate to higher education” were examined (NCA-HLC, 2003, p.1.1-3), and the term “standards” changed to “criteria” for accreditation. Then in 1957, North Central started to “periodically reaffirm the accreditation of its members and placed a new emphasis on renewal and improvement” (NCA-HLC, 2003, p.1.1-3). North Central first published its *Handbook for Accreditation* first came out in the mid 1970s and emphasized the “self-study process as both a procedure for gathering data for accreditation decisions and a means of improvement” (NCA-HLC, 2003, p.1.1-4).

In 1989, North Central “posited that assessment of student learning is an essential component of every organization’s effort to evaluate overall organizational effectiveness” (NCA-HLC, 2008, p.241). To stress the importance of student learning outcomes assessment, NCA-HLC in 2003 added a position statement to its *Handbook of Accreditation, Third Edition* (NCA-

HLC, 2008, p.241). Assessment, then, became embedded in the Criteria and Core Components for accreditation. The Commission declared that “effective assessment is best understood as a strategy for understanding, confirming, and improving student learning” (NCA-HLC, 2008, p.241). NCA-HLC lists six “Fundamental Questions for Conversations on Student Learning” that are supposed to spark dialogue and to support student learning:

1. How are your stated student learning outcomes appropriate to your mission, programs, and degrees?
2. What evidence do you have that students achieve your stated learning outcomes?
3. In what ways do you analyze and use evidence of student learning?
4. How do you ensure shared responsibility for assessment of student learning?
5. How do you evaluate and improve the effectiveness of your efforts to assess and improve student learning?
6. In what ways do you inform the public and other stakeholders about what and how well your students are learning? (NCA-HLC, 2008, p.241).

The original list of questions, dated April 2005, did not include the last question, added in March 2007. The document listing these “Questions” indicates that they will be placed in the Peer Reviewer Manual and the Handbook in 2008. At this point, they are not included.

After a major study of the organization in the late 1990s, the North Central Commission restructured its “governance and decision making-processes” and created “a new mission statement, core values, vision, and strategic priorities” (NCA-HLC, 2003, p.1. 1-2). Besides the new mission, listed above, the name also changed from being commonly called North Central to being called the Higher Learning Commission (NCA-HLC, 2003, p.1. 1-2). NCA-HLC points out a major change that shows the shift that occurred in the introduction of their *Handbook for Accreditation*; for example, the mission once read “serving the membership,” but now it reads,

“serving the common good,” a change illustrating the shift to a new priority beyond the membership while still focusing on quality assurance and improvement.

Institutions have two choices to follow for accreditation: a traditional method and an alternative method. Most institutions still choose the traditional method, the current version of which is called the Program to Evaluate and Advance Quality (PEAQ). PEAQ, established in 2003, first became available for institutions to use in fall 2004. The Criteria for Accreditation cover five areas, and each criterion has three parts: criteria statements (necessary attributes), core components (evidence of the criteria), and examples of evidence (illustrative examples of specific evidence) (NCA-HLC, 2003, p. 3.1-1). All institutions must follow the criteria for accreditation.

A small group of schools participate in the NCA-HLC Academic Quality Improvement Program (AQIP), an alternative to the self-study process that was developed at the turn of the 21st century and is focused on improving institutional quality through a continuous cycle. As of February 1, 2010, 201 accredited institutions participated in this process. (NCA-HLC, 2010). AQIP institutions are “part of an intensive, collaborative effort to reshape their cultures and to make a commitment to continuous quality improvement their constant focus” (NCA-HLC, 2008, p.244). Institutions participate in the program by engaging in the continuing improvement program, which may or may not be linked to maintaining accreditation (NCA-HLC, 2003, p. 6.1-2). Assessment is a key function of the AQIP process. The AQIP institutions must “measure student learning—and use the results to improve teaching and learning processes as well as all other institutional processes that contribute to student learning” (NCA-HLC, 2008, p.244). In the *Helping Students Learn* AQIP category, institutions must “address specific questions about its teaching-learning processes, about the performance of these processes, and the way the

institution uses results data to improve” (NCA-HLC, 2008, p.244). To this end, all institutions create a Systems Portfolio, which answers the Higher Learning Commission’s fundamental questions under each of the accreditation categories. The Systems Portfolio goes through a Systems Appraisal, a review by Commission-trained representatives who provide feedback on the Portfolio. Also, the institutions create at least three Action Projects focusing on institutional improvement, one of which addresses student learning assessment. These are reviewed annually.

In November 2006, HLC began the Academy for Assessment of Student Learning, which is a “four-year sequence of events and interactions focused on student learning, targeted at accelerating and advancing efforts to assess and improve student learning, and designed to build institution-wide commitment to assessment of student learning” (NCA-HLC, 2008, p.251). Institutions in the NCA-HLC region can participate in this Academy to fulfill accreditation requirements related to student learning, to avoid mandates related to insufficient student learning outcomes assessment information, or to implement one of the AQIP action projects (NCA-HLC, 2008, p.251). Institutions participate in teams to create an Action Portfolio, attend workshops, and receive feedback on their portfolios. In the end, institutions write a brief Results Report, and the Academy compiles the publications as a “showcase of accomplishments and inventory of good practices” (NCA-HLC, 2008, p.251).

Starting in 2009, NCA-HLC introduced a new method of review: *Pathways Construction Project*, “a new model for continued accreditation that seeks to offer greater value to institutions through its reaffirmation process for continued accreditation and greater credibility to the public in its quality assurance” (NCA-HLC, 2009, p. 1). HLC will not implement the *Pathways* initiative until 2015. At this point, the process is completely under review.

Student Learning Outcomes Assessment Information. When asked about learning outcomes assessment at NCA-HLC, a staff member said, “The Commission has maintained a steady focus on assessment of student learning since 1989, which is when the first position statement on assessment was published” (personal communication, July 9, 2009). Increasingly, NCA-HLC has “expanded, deepened and made more fundamental than ever its commitment to students, their learning, and the use of assessment as what it sees as a massive tool of inquiry, data, and improvement into student learning” (personal communication, July 9, 2009). To this end, NCA-HLC staff member asserts that the “assessment of student learning is an absolutely fundamental system for an institution to have in place if it is serious about knowing what and how well students are learning” (personal communication, July 9, 2009). NCA-HLC has “become increasingly less prescriptive” while at the same time deepening its requirements for student learning outcomes assessment, so that institutions must comply but can create their own systems for doing so (personal communication, July 9, 2009). In the late 1990s to 2003, NCA-HLC focused on having institutions create assessment plans and engage faculty with the assessment process. Then, as the Commission developed on its understanding of assessment, it began to look at implementation of assessment at each level (personal communication, July 9, 2009). Eventually, the institutions and the Commission evolved again with such a strong focus on assessment that the focus on student learning had weaned. In 2004-2005, the Commission readjusted the focus back on student learning, so that assessment became “the tool for knowing what and how well students learn” (personal communication, July 9, 2009). To that end, the Fundamental Questions became the central focus for the assessment efforts.

NCA-HLC learned, through the years, that disciplines are similar in some ways with regard to assessment but very different in others, making “assessment much more discipline

based than originally thought.” The process for assessment changed over time as well, as illustrated by this point:

At first we thought assessment was more like strategic planning, whereas it’s much more organic, more cultural, more of a self-organizing akin to the kind Wheatley and Gladwell describe. It requires more perseverance, commitment, and interdependencies than we thought when we started. (personal communication, July 9, 2009)

It soon realized “an appreciation of all the arenas where assessment can play a role and how those arenas demand different things” (personal communication, July 9, 2009).

NCA-HLC developed a rubric that showed good practices with the intention that peer reviewers could use it as a guide to dialogue with the campuses about their assessment practices. Instead it became a sort of “grading tool,” which was not at all the expectation of the Commission. Now, the Fundamental Questions are used to assist with the dialogue for peer reviewers and for campuses. In the same vein, NCA-HLC shies away from promoting “best practices,” so that institutions do not think there is a “right” way to do assessment. Instead assessment should fit with the mission of the institution.

By 2001, most of the institutions had an assessment plan and were grappling with an assessment system (personal communication, July 9, 2009). At that point, few institutions had robust, comprehensive assessment results nor were they able to use the collected information effectively. The institutions first had to figure out what assessment was, and in doing so, they realized that it required a cultural shift, a fact to which they responded differently. It is interesting that even though liberal arts institutions were already doing assessment, they have been the slowest to adapt. Now, according to NCA-HLC, institutions are asking better questions such as: “We really need our students to learn X. How do we make sure that it happens?” “What’s the okay standard?” and “Is it ok if 90% get it?” These are “deeper, more complex

questions about assessment for real learning.” Today, institutions have data, but they struggle with how to use it.

Standards. The *Handbook of Accreditation: Third Edition* provides the criteria for accreditation; there are five sets of criteria that institutions must address, including Mission and Integrity; Preparing for the Future; Student Learning and Effective Teaching; Acquisition, Discovery, and Application of Knowledge; Engagement and Service. These criteria cover fulfilling the mission, resource allocation, quality educational programs, building intellectual capacity, and serving the institutional constituents. The third criterion is geared to student learning outcomes assessment although others also refer to student learning outcomes assessment generally. For instance, Criterion 1 (Mission and Integrity) discusses the importance of institutions clearly articulating their commitments and of institutions having the leadership and governance to make it possible to fulfill institutional missions. Criterion 2 (Preparing for the Future) leans toward assessment of student learning as it talks about assessment in general:

The organization’s allocation of resources and its processes for evaluation and planning demonstrate its capacity to fulfill its mission, improve the quality of its education, and respond to future challenges and opportunities. (NCA-HLC, 2003, p. 3.1-3)

The Core Component 2c elaborates on the criterion as it relates to assessment:

The organization’s ongoing evaluation and assessment processes provide reliable evidence of institutional effectiveness that clearly informs strategies for continuous improvement. (NCA-HLC, 2003, p. 3.1-3)

These are indirectly related to student learning, given that most institutions list learning as an essential part of the mission.

Criterion 3 (Student Learning and Effective Teaching) outlines the NCA-HLC expectations for student learning outcomes assessment. Criterion 3 states: “The organization

provides evidence of student learning and teaching effectiveness that demonstrates it is fulfilling its educational mission” (NCA-HLC, 2003, p. 3.1-4). This criterion has four core components:

- 3a. The organization’s goals for student learning outcomes are clearly stated for each educational program and make effective assessment possible.
- 3b. The organization values and supports effective teaching.
- 3c. The organization creates effective learning environments.
- 3d. The organization’s learning resources support student learning and effective teaching. (NCA-HLC, 2003, p. 3.1-4)

These subcriteria indicate that student learning outcomes must be clearly defined for accredited institutions. Plus, one description of appropriate evidence requires that each institution “clearly differentiates its learning goals for undergraduate, graduate, and post-baccalaureate programs by identifying the expected learning outcomes for each” (NCA-HLC, 2003, p. 3.1-4). While NCA-HLC expects outcomes to be listed, it does not indicate how assessment should be carried out. Even so, it does suggest using “both direct and indirect measures of student learning.” It also suggests using data gathered for external accountability such as “graduation rates, passage rates on licensing exams, placement rates, and transfer rates” (NCA-HLC, 2003, p. 3.1-4). The Commission states that “neither the Criteria nor Core Components prescribe specific methods for assessing and improving learning” (NCA-HLC, 2008, p. 242), and it claims that NCA-HLC allows the institutions to find an assessment method that works best for their unique situation. For that reason, institutional reviews do not look for specific methods but rather engagement with student learning that fits with the institutional mission. A representative of NCA-HLC explained that the expectation is that an institution will find the most effective method for assessment for that institution, its students, and its modes of delivery (personal communication, July 9, 2009).

Regarding how the assessment information should be used, the NCA-HLC Core Component 3c indicates that “Assessment results inform improvements in curriculum, pedagogy, instructional resources, and student services” (NCA-HLC, 2003, p. 3.1-4). As an example, NCA-HLC requires for a quality assurance procedure that evaluates all aspects of educational activities for student learning (NCA-HLC, 2003, p. 3.1-4). The focus, then, of student learning outcomes assessment is, in this case, for improvement of the academic program. The student learning enterprise is expected to be supported and a high value is placed on effective teaching strategies (NCA-HLC, 2003, p. 3.1-4). It is expected that education is a central value for all stakeholders, including the “board, administrators, students, faculty, and staff” (NCA-HLC, 2003, p. 3.1-5). In addition, NCA-HLC requires an understanding of what students learn, expecting institutions to “assesses the usefulness of its curricula to students who will live and work in a global, diverse, and technological society” (NCA-HLC, 2003, p. 3.1-5).

The criteria, position statements, and supporting documents indicate that institutions should use assessment for improvement of student learning, as well as educational programs and the institution overall. NCA-HLC maintains that “institutions are improving pedagogy, assignments, course sequence, curricula use of technology, faculty development, and other aspects of the educational program” (personal communication, July 9, 2009). Even so, there is less documentation that can demonstrate improvement in understanding actual student learning. While many institutions have clearly articulated student outcomes, according to a NCA-HLC staff person, the institutions continue to struggle with out to assess the outcomes and use the data. The institutions are falling short on understanding what and how well students are learning and on connecting these understandings to resources and planning. The staff member is quick to point out that

It's not that the learning has not improved or been sustained. Faculty probably know several examples such as License exams, rubric scores, portfolio results, authentic performance results; Analyzing, using, and communicating data remain huge challenges. (personal communication, July 9, 2009)

Nonetheless, many institutions are “where faculty groups have two or three rounds of information of what their students are learning and can show they are making headway” (personal communication, July 9, 2009).

Public disclosure of learning outcomes assessment information is mentioned under Core Component 3a, which stipulates that “Results obtained through assessment of student learning are available to appropriate constituencies, including students themselves” (NCA-HLC, 2003, p. 3.1-4). Criterion 5 (Engagement and Service) addresses the public as well as the internal groups to which organizations provide services and are accountable, and student learning outcomes assessment also falls under this category in three of the Core Components:

- The organization learns from the constituencies it serves and analyzes its capacity to serve their needs and expectations.
- The organization has the capacity and the commitment to engage with its identified constituencies and communities.
- Internal and external constituencies value the services the organization provides. (NCA-HLC, 2003, p. 3.1-6).

These statements speak to how institutions prove that they add value to the educational experience. In addition, NCA-HLC commends institutions that participate in transparency initiatives even though programs are not required (NCA-HLC, 2008b). When the standards were written in 2002, the “accountability discussion was not on the table in the same way that it is today” (personal communication, July 9, 2009). NCA-HLC is now asking,

If institutions begin to use assessment for accountability purposes; i.e., to prove versus to improve, what will be lost? Can assessment and accountability be complementary

agendas? Must they compete? How do we respond to accountability and transparency and still sustain assessment's focus on improving student learning? (personal communication, July 9, 2009).

Yet it also continues to focus on the important question of how “to inform the public about what and how well students learn, about integrity of mission and operation, in ways that are understandable?” (personal communication, July 9, 2009). While NCA-HLC congratulates institutions on transparency initiatives showing institutional integrity and communication with the public, it also warns that such initiatives do not necessarily make an institution “accountable to the public. As the Commission’s Accountability Statement indicates, “. . . where the templates address student success, student engagement and student learning, the data represent only single markers derived from the broader and richer evidence that institutions need to foster improvements in educational programs and services” (NCA-HLC, 2007, p.1).

NCA-HLC clearly mentions faculty and administrators’ involvement in the process of student learning outcomes assessment, for instance, in the following statements:

- Faculty are involved in defining expected student learning outcomes and creating the strategies to determine whether those outcomes are achieved.
- Faculty and administrators routinely review the effectiveness and uses of the organization’s program to assess student learning.
- Qualified faculty determine curricular content and strategies for instruction.
- The organization provides effective staffing and support for its learning resources. (NCA-HLC, 2003, p. 3.1-4).

While the final statement does not mention faculty directly, it does indicate the importance of the having enough human resources available to make student learning outcomes assessment successful.

A representative of NCA-HLC said, “Faculty get engaged when they grapple with something that is meaningful and complex in student learning that connects to their disciplines, the students, teaching and learning” (personal communication, July 9, 2009). NCA-HLC suggests that, if assessment is someone else’s agenda, then it will not usually be “meaningful or engaging,” but will be “paperwork and reporting with no engagement. Basically, there’s nothing there” (personal communication, July 9, 2009). If the administration changes or becomes less interested in assessment, then it will not be sustained. For assessment to work, “Administrators have to pave the way to make it happen, provide funds, and sustain it as a priority” (personal communication, July 9, 2009). A shift has occurred over time, so that faculty are more engaged.

Governing board involvement in the assessment process is not a requirement of the Criteria, but since assessment should be integrated in the budget and planning process, the board may be aware of the assessment activities and may be accountable at that level.

Student Learning Outcomes Assessment Resources. Information on student learning outcomes assessment relating to the Assessment Academy and the Academic Quality Improvement Program (AQIP), its workshop Assessment as a Core Strategy, and its annual meeting, including the printed proceedings from the meetings categorized on student learning outcomes assessment among other areas, can be found on the NCA-HLC website (www.ncahlc.org). Some documents on student learning are on the website, although they are not made obvious. In addition, the *Handbook of Accreditation: Third Edition* can be found on the website.

NCA-HLC has several avenues for providing information on student learning outcomes assessment for all members includes its annual meeting, which has several sessions and printed conference proceedings on the topic. In addition, it offers multi-day workshops on assessment

and a four-year Academy for Assessment for those institutions that able to become members. At the workshops and the Academy roundtable, institutions receive a binder with overviews on assessment, case studies, lists of references, and articles. In both the workshops and the Academy, institutional teams must attend and must come up with plans for assessment on their campuses. The information, then, is not just a passive attempt to educate but requires participation. Importantly, the workshops focus on assessment not as compliance, but as a way to “understand what learning is and is not occurring,” as well as to clarify goals, understand learning, and continuously improve (NCA-HLC, 2008, p. 93).

“Few institutions question whether they are going to do assessment anymore. The questions are what, how, when?” (personal communication, July 9, 2009). NCA-HLC found that institutions genuinely struggled with assessment. Besides the annual meeting which provides professional development, the training programs answer questions and provide a feedback loop for the accreditor and the institutions. The Academy for the Assessment of Student Learning was created for institutions to work on some issue or project surrounding learning outcomes assessment. At this point, institutions mainly want

to build a culture that focuses on learning, embraces assessment as a iterative process, and analyzes and acts on data in and to understand how to use data in ways that are, as sister agency Middle States says are meaningful, useful, workable, and reasonable. (personal communication, July 9, 2009).

Workshops related to these topics are different from the type of workshops offered previously, in which institutions wanted to know, “What is assessment?” Institutions are beyond establishing outcomes; their engagement level is different (personal communication, July 9, 2009).

The Commission realizes that the best resources are the people in the region working on assessment on a daily basis, so it has those people do the training. They have about 75 people, “who have been handpicked and trained to serve as mentors.” The mentors are not formal

consultants as much as “everyday people.” Although some experts are used as speakers, the Commission prefers skilled, experienced mentors knowledgeable of good practice to work with them (personal communication, July 9, 2009) If someone is seen as an experts, the tendency was for institutions “hang on every word, for exactly what to do, and how rather than to build the capacity internally and the motivation intrinsically” (personal communication, July 9, 2009). The mentors and the workshops provide a way for institutions to have “purposeful interactions with other institutions” (personal communication, July 9, 2009).

Participants in the workshops represent the diversity of institutions in the region, who are participating for a variety of reasons, such as general interest or to fulfill accreditation requirements. To successfully complete the Academy, you need to have a portfolio with a multi-prong approach to improving student learning on the campus, to demonstrate active work toward the intended results, and to complete all required activities of the Academy (personal communication, March 11, 2010).

Peer Review. The 1300 to 1400 peer reviewers for the NCA-HLC region include senior administrators, members of the public, faculty, and middle administrators. The NCA-HLC philosophy is to have “a small group that is highly trained . . . go out regularly” (personal communication, July 9, 2009). As a general role, NCA-HLC staff members do not visit campuses with the teams. The team members review institutions that are “peers or close peers” to their own institutions and sometimes institutions request a team member to be from a certain background. The Commission requires that peer reviewers are trained and return to training regularly. This training includes information on assessment, “because effective peer review relies on both experience and knowledge, training in assessment of student learning is particularly critical” (personal communication, July 9, 2009).

Accreditation Actions. The accreditation process relies on peers “to make the decision on what is quality,” and peer reviewers are trained “to look for perseverance, continuity, sustained effort, pattern of increasing attention and institutional capacity and commitment to assessing and improving student learning, educational excellence, and institutional effectiveness” (personal communication, July 9, 2009). Basically, the teams want to see what is outlined in the Criteria, such as clearly defined outcomes, data collection related to those outcomes, analysis of the data, and use of the information to improve the institution. In addition, there needs to be a commitment across the institution, so that student learning outcomes assessment is linked with planning and resource allocation (personal communication, July 9, 2009). Moreover, teams look for “a sustained effort that builds further institutional capacity to assess and improve learning” (personal communication, July 9, 2009). In other words, the teams want to see that the assessment work will persevere after the accreditation visit is over. Successful institutions will display all of the items listed above during the self-study and peer visit.

To understand what is happening at an institution, there must be “deep, deep interviewing of administrators, faculty, and others. There must be a clear understanding of institutional mission and goals in relationship to student learning” (personal communication, July 9, 2009). A large shift is occurring in accreditation; whereas before the peer team reviewed what the institution had done, now they want to see what the institution looks like at the time of review, as well as its plans for the future. How are the institutions going to sustain the efforts with assessment? NCA-HLC continues to focus on the next steps and getting the peer reviewers to that level. One tool that is used is the C-RAC Principles of Good Practice, which will be discussed in detail in Chapter 5. They are “helpful in recentering” the efforts (personal communication, July 9, 2009).

Right now, “Very few institutions get by without strong language on assessment” (personal communication, July 9, 2009). In fact, in a study completed in 2005, seven out of ten institutions received some sort of monitoring with the vast majority of that follow-up focusing on the assessment of student learning (personal communication, July 9, 2009). As of July 2009, 60% of focus visits, 30% of progress reports, and 40% of monitoring reports involved assessment of student learning. The three most common issues cited by teams are assessment, governance and planning, and finances (personal communication, July 9, 2009).

NCA-HLC points out that, in this region, “there are two decades of experience in this area” (personal communication, July 9, 2009). The schools are figuring out what works for them, which is much better than prescriptive measures. The level of engagement with assessment and the culture are ways to judge what students are doing in the classroom. NCA-HLC sees both institutions that are “big into assessment” and have “well constructed systems,” as well as others that are doing “very homegrown, targeted assessment” (personal communication, July 9, 2009). There is also a backlash against assessment. Institutions are asking if assessment itself or learning is the actual point of assessment? The Spellings Report started a conversation that should have been discussed long before: how do we answer questions about learning and about accountability? The HLC poses this question to institutions attending assessment events: “In what ways do you inform the public and others about what and how well students are learning?” (personal communication, March 11, 2010).

Summary. As the largest region, NCA-HLC has a large diverse array of institutions, and its mission is to advance quality at those institutions. Starting in 1989, NCA-HLC began to focus on student learning as an essential element to accreditation, and in 2003, student learning outcomes assessment was included in the *Handbook for Accreditation*, as Criterion 3. The

Commissions Fundamental Questions are a tool for both institutions and peer reviewers to review institutional practices in student learning outcomes assessment. This region has two ways that institutions can seek to be accredited, through the PEAQ or AQIP, and it is in the process of developing a Pathways process. In all cases, institutions must abide by the standards. The Commission offers many training programs including the Academy, which is a four-year team based program focused on learning outcomes assessment. The focus for the assessment is for institutional effectiveness through improving the academic process. The region expects faculty involvement and promotes sharing assessment information with students. NCA-HLC encourages transparency as an issue of integrity.

Northwest Commission on Colleges and Universities (NWCCU)

The mission of the Northwest Commission on Colleges and Universities (NWCCU) is to assure educational quality, enhance institutional effectiveness, and foster continuous improvement of colleges and universities in the Northwest region through analytical institutional self-assessment and critical peer review based upon evaluation criteria that are objectively and equitably applied to institutions with diverse missions, characteristics, and cultures (NWCCU, n.d.).

In its mission, NWCCU emphasizes the diversity of institutions both in its own mission statement and in the introduction to its standards, which includes a statement in support of the range of institutions in the region, including “from public to private; large to small; church-related to nondenominational; liberal arts to research to vocationally oriented; residential to commuter; and highly selective to open admission” (NWCCU, 2003, p.2). The Commission’s stance on accreditation is influenced by the institutional makeup of the region, and it appears to lean towards judging institutions quality and effectiveness based on their institutional uniqueness (NWCCU, 2003, p.2).

Demographics. NWCCU accreditation agency, headquartered in Redmond, Washington, accredits institutions in Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington. As of January 2010, the Northwest Commission’s membership included 163 accredited institutions. It has twice as many public institutions as it has private institutions, and a quarter of all tribal institutions are located and accredited in this region. The staffing of this Commission is the same as that of others: Commissioners, of which they have twenty, staff members, they have eight, and peer reviewers.

Background. Northwest Commission on Higher Education was created in 1917 to bridge the gap between secondary schools and higher education. By 1939, the association began to look at “the evaluation and improvement of the quality of the educational process” (Stetson, 1959, p. 59). The founding purposes of this Commission were to “describe the characteristics of colleges” that are recognized as institutions of higher education, to evaluate the services of those institutions, and to help them improve by setting up standards for them to meet (p. 60). In 1922, Standards were adopted by the Commission, and, in 1939, those standards were rewritten to allow for more qualitative measures to be included. The standards for accreditation were revised again in 1965 have been revised seventeen times between that date and 2003, so that a revision occurred about every two years. The most recent revision to the Standards was approved in January 2010, but will not be used by institutions until 2012. For that reason, this analysis will focus on the 2003 standards and then list notable updates in the 2012 version.

Standards. Northwest’s *Accreditation Handbook* (2003) lists twenty essential Eligibility Requirements, one of which, Student Achievement, speaks to Student Learning Outcomes Assessment: “The institution identifies and publishes the expected learning outcomes for each of

its degree and certificate programs . . . Through regular and systematic assessment, it demonstrates that students who complete their programs . . . will achieve these outcomes” (p. 7).

The Commission has nine main standards: Institutional Mission and Goals, Educational Program and its Effectiveness, Students, Faculty, Library and Information Resources, Governance and Administration, Finance, Physical Resources, and Institutional Integrity. The Commission makes the eligibility requirement on Student Achievement more specific in the standards for accreditation. Standard 1.B. Planning and Effectiveness also evokes student learning outcomes assessment in its focus on assessing the institutional mission and goals, even at the program level. This standard calls for institutions to address the question of whether or not they are meeting their mission and goals through “broad-based, continuous planning and evaluation” (NWCCU, 2003, p. 27).

The second standard, Educational Programming and Effectiveness focuses on student learning outcomes assessment. The “general requirements” for Standard 2.A state:

The institution offers collegiate level programs that culminate in identified student competencies and lead to degrees or certificates in recognized fields of study. The achievement and maintenance of high quality programs is the primary responsibility of an accredited institution; hence, the evaluation of educational programs and their continuous improvement is an ongoing responsibility. As conditions and needs change, the institution continually redefines for itself the elements that result in educational programs of high quality. (NWCCU, 2003, p. 27)

The Eligibility requirement, the Institutional Effectiveness Standard, and the Standard on Educational Programming all posit institutional understanding of student learning as central to accreditation.

As the eligibility requirement and Standard 2.B.2 indicate, institutions “must identify and publish the expected learning outcomes” (p. 7); Standard 2. B, Educational Program and Planning, also requires that measures for doing so will be “clearly defined,” “conducted on a

regular basis,” and “integrated into the overall planning and evaluation plan” (p. 29). Policy 2.2, Educational Assessment, stipulates that institutions should have a plan in place that not only assesses outcomes but discusses the role that information gathered about outcomes will play in further planning. The focus appears to be on program-level and not course- or institutional-level outcomes. Also important to note is that Standard 2.B.2 mentions publishing expected learning outcomes is the only one that addresses what information should be publically available.

The Commission provides in Standard One and in the policy for educational assessment examples of which outcomes measures may be used. The type of documentation suggested as appropriate with regard to Standard One includes student learning outcomes assessment data such as:

- annual goals and assessment of success in their accomplishments;
- studies of alumni and former students;
- studies regarding effectiveness of programs and their graduates;
- studies that indicate degree of success in placing graduates;
- pre- and post-test comparisons of student knowledge, skills, and abilities; and
- surveys of satisfaction - students, alumni, and employees. (NWCCU, 2003, p. 27).

In addition, the policy on educational assessment provides specific examples that can be used in various ways that are guided by the institution’s mission, which “could yield an efficacious program of outcomes assessment” (p. 37). To this illustrative list of outcomes measures, Northwest adds questions related to student information (ie. transfer rates and admissions information); mid-program assessment (ie. evidence of student success in coursework); end of program assessment (ie. graduation rates and retention patters); program review and specialized accreditation; alumni satisfaction and loyalty; dropouts/non-completers; and employment and/or

employer satisfaction measures (pp. 37-39). While Northwest does not offer a specific strategy for putting these questions into practice, it does recommend that a variety of data be collected because “the more data sources that contribute to the overall judgment, the more reliable that judgment would seem to be” (p. 37).

The eventual use of learning outcomes assessment for improvement is indicated in Standard 2.B.3: “The institution provides evidence that its assessment activities lead to the improvement of teaching and learning” (p. 29). The educational assessment policy also “stresses” that “outcomes assessment is an essential part of the ongoing institutional self-study and accreditation processes” (p. 37). The focus on student learning outcomes assessment should help the institution to fulfill its mission, to improve the educational process, and to meet accreditation requirements.

The highest expectations for involvement in student learning outcomes assessment are placed on the faculty. Standard 2.B.1 specifies that “While key constituents are involved in the process, the faculty have a central role in planning and evaluating the educational programs” (p. 29). There is no mention of governing boards related to student learning outcomes assessment although Standard 6.B. on Governing Boards notes that this group is “ultimately responsible for the quality and integrity of the institution” (p. 72).

As of January 2010, the Northwest Commission has approved new Standards for Accreditation. These requirements will not be used for accreditation until 2012, so institutions will continue to use the standards listed above. Even so, it is useful to examine the changes from the last set of requirements to the new ones. One major change relates to the size of the document, which was once 179 pages and is now only seventeen. Obviously, an effort has been made to streamline and simplify the standards. Several changes are particularly worthy of note.

First, the Institutional Integrity Standard, 2.A.21 speaks specifically to public disclosure, necessitating that the institution “communicates its academic intentions, programs, and services to students and to the public and demonstrates that its academic programs can be completed in a timely fashion” (NWCCU, 2010, p. 4). This statement appears to speak to publishing student learning goals, but not assessment results. The new standards address course-level student learning outcomes assessment in Standard 2.C.2, which states, “The institution identifies and publishes expected course, program, and degree learning outcomes. Expected student learning outcomes for courses, wherever offered and however delivered, are provided in written form to enrolled students” (p. 6). In addition, general education learning goals must be clearly stated and must be assessed, per Standard 2.C.10 (p. 8). The 2010 standards also include learning outcomes assessment in Standard 4.A.3, which says

The institution documents, through an effective, regular, and comprehensive system of assessment of student achievement, that students who complete its educational courses, programs, and degrees, wherever offered and however delivered, achieve identified course, program, and degree learning outcomes. Faculty with teaching responsibilities are responsible for evaluating student achievement of clearly-identified learning outcomes.

This standard basically repeats the fundamental requirements from the last set of standards but adds “course” as a key category within possible learning outcomes. In addition, the focus of statement on faculty has shifted from the task of building an assessment plan to evaluating student achievement.

The new standards also appear to have a stronger statement on the use of student learning outcomes assessment, as demonstrated by Standard 4.B.2:

The institution uses the results of its assessment of student learning to inform academic and learning-support planning and practices that lead to enhancement of student learning achievements. Results of student learning assessments are made available to appropriate constituencies in a timely manner.

Significantly, “use” of the results now entails sharing the results of the assessment.

Student Learning Outcomes Assessment Information. The Northwest web page (www.nwccu.org) does not include any information on student learning outcomes assessment. The annual meeting and workshops do not mention student learning outcomes assessment, nor are there any visible resources on student learning outcomes assessment on the website.

Accreditation Actions. No information concerning the enforcement of accreditation standards related to learning outcomes assessment and the consequences of non-compliance is not available.

Summary. The NWCCU has twice as many public institutions as private ones. NWCCU lists student learning outcomes assessment in an eligibility requirement and a standard on institutional effectiveness, but the focus of learning outcomes assessment information is in Standard 2. These various areas of the requirements all point to the fact that student learning outcomes assessment is central to accreditation. NWCCU sees that these efforts of assessment lead to the improvement of the teaching and learning process. It has a strong emphasis on faculty involvement. New Standards were approved for this region in January 2010, and the statements on student learning outcomes assessment have been strengthened. In particular, where the 2003 Standards focus on having an assessment plan, the 2010 ones focus on assessing student learning and using the results. In addition the new Standards state that results need to be publicly shared.

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

The purpose of SACS is apparent in its mission statement, which focuses on educational effectiveness and also speaks to what accreditation signifies:

The Commission's mission is (1) the enhancement of educational quality throughout the region and (2) the improvement of the effectiveness of institutions by ensuring that they meet standards established by the higher education community that address the needs of society and students.

Accreditation by the Commission on Colleges signifies that the institution (1) has a mission appropriate to higher education, (2) has resources, programs, and services sufficient to accomplish and sustain that mission, and (3) maintains clearly specified educational objectives that are consistent with its mission and appropriate to the degrees it offers, and that indicate whether it is successful in achieving its stated objectives. (SACSCOC, 2007, p. 1).

In addition to its mission, the Commission lists fundamental characteristics of accreditation that substantiate the mission and the purpose of the Commission. Some of these fundamental characteristics are standard features of regional accreditation, such as it being a voluntary process, a form of self-regulation, a peer review process, and an evaluation of the institution with regard to its stated mission. Specific to the Southern Commission are the following:

- Accreditation requires an institutional commitment to student learning and achievement.
- Accreditation requires institutional commitment to the concept of quality enhancement through continuous assessment and improvement.
- Accreditation expects an institution to ensure that its programs are complemented by support structures and resources that allow for the total growth and development of its students. (SACSCOC, 2007, p. 3)

The final statement's specific focus on the "total growth and development of its students" makes it a unique contribution of SACSCOC.

Demographic information. The Southern Association of Colleges and Schools Commission on Colleges (or SACSCOC), headquartered in Atlanta, Georgia, accredits

institutions in the Southern region of the United States, including in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, as well as in Latin America and other international sites. This region is very similar to other regions in that it has a Commission, peer reviewers, and staff. SACSCOC refers to its group of represented members as The College Delegate Assembly, and also has an elected body termed, Commission on Colleges. With 77 members, the Commission on Colleges is larger than most of its counterparts in other regions.

According to a SACSCOC representative, the member institutions are heavily involved in the major decisions and directions of accreditation through the College Delegate Assembly—one voting representative from each of the approximately 800 member institutions. The culture of the southern region is shaped by historical factors, and generally speaking, the South has sometimes been “stereotyped as behind the rest of the world” (personal communication, July 10, 2009). This region has more financial issues than other regions because of poverty. In the 1980s and early 1990s, many of the southern states—for instance, Tennessee—adopted policies for student learning outcomes assessment. Just as in other regions, the regional accreditors try to work with the state policy makers to assure that the state policies for institutions and the accreditation policies are not in conflict. In regards to institutional types, this region has a high number of faith-based institutions and more Historically Black Colleges and Universities (HBCU) than any other region. At the same time, there is a majority of public institutions in this region, and only about 40% of the institutions are private.

Background. The Southern Commission was created in 1895 when six charter institutions decided they needed the following:

1. to organize southern schools and colleges for mutual assistance and cooperation;

2. to elevate the standard of scholarship and bring about uniformity of entrance requirements; and
3. to develop preparatory schools and eliminate preparatory work from the colleges. (Agnew, 1959, p. 64).

At this point, any school or college in the southern region could join the association if it received a recommendation from the executive committee and its membership was agreed upon by the association. Not until 1920, did the Commission start to accredit institutions based on Commission-approved standards and not until 1924 were standards created for junior colleges (Agnew, 1959, p. 64). In 1930, the organization started recognizing historically black colleges and universities (HBCUs) by keeping a list of them, but the Commission “did not apply the same rigorous standards as it applied to institutions for white students, nor did it admit them to membership” until 1957, with a plan to accredit all that met the more rigorous standards by 1961 (Agnew, 1959, p. 67).

Student Learning Outcomes Assessment Information. SACSCOC efforts for student learning began in the 1980s with “a push for measuring institutional effectiveness” (personal communication, July 10, 2009). The assessment movement had just begun, so student learning outcomes assessment information was limited. SACSCOC asked for each institution to set learning goals. Often, institutions listed “process goals (like hire X number of more faculty) rather than assessment goals (like graduates in the MBA program will pass the CPA)” (personal communication, July 10, 2009). While SACSCOC has been involved with student learning outcomes assessment for a long while, a representative states that “It’s been a slow migration to get to student learning outcomes” (personal communication, July 10, 2009). To move the process along, the member institutions—by way of the College Delegate Assembly—voted to clarify

3.31, so that student learning outcomes assessment must be shown at the program level, which they did on their own accord, which shows interest in and a commitment to really

looking at what students are expected to learn and how they are performing in relationship to those expectations and what can be done when there is a gap there (personal communication, July 10, 2009).

Specifically, the Commission wants “well-stated program learning outcomes for each major” (personal communication, July 10, 2009). By well-stated, SACSCOC means that “they need to be measurable” and

have vertical linkage to the purpose of the department, school, and college. When our evaluators visit an institution, they expect to see a listing of the programs, and a sampling of the program learning outcomes for each of the programs, and the assessment measurements that are aligned to the learning outcomes (personal communication, July 10, 2009).

Some cases emerge, a SACSCOC representative describes, in which the assessment measures do not align with the learning outcomes, especially within General Education. The institutions and the peer evaluators pay attention to whether the institutions are measuring what they purport students should learn from the institution. Given the diversity of institutions, SACSCOC allows for institutional autonomy because this “autonomy allows for institutions to be creative, change, and innovate, whereas if certain tests were mandated, then it will set the learning outcomes,” leading to institutions focusing the learning on the test, instead of being creative.

Standards. As outlined in the *Principles of Accreditation: Foundations for Quality Enhancement*, the SACSCOC requires two documents. First, a Compliance Certification must be submitted that describes the institution’s “compliance with each of the Core Requirements, Comprehensive Standards, and Federal Requirements” (SACSCOC, 2007, p.6); these are “basic, broad-based, foundational requirements that an institution must meet to be accredited” (p. 15). Second, a Quality Enhancement Plan (QEP) must be submitted which

(1) includes a broad-based institutional process identifying key issues emerging from institutional assessment, (2) focuses on learning outcomes and/or the environment supporting student learning and accomplishing the mission of the institution, (3) demonstrates institutional capability for the initiation, implementation, and completion of

the QEP, (4) includes broad-based involvement of institutional constituencies in the development and proposed implementation of the QEP, and (5) identifies goals and a plan to assess their achievement. The QEP should be focused and succinct (no more than seventy-five pages of narrative text and no more than twenty-five pages of supporting documentation or charts, graphs, and tables). (SACSCOC, 2007, pp.6 and 19)

While this information provides an overview of the expectations for the QEP, section one of the Standards provides the information on integrity; section two reviews the seven core requirements, which are “basic, broad-based, foundational requirements” (p.15); section three the fourteen comprehensive standards, which are specific requirements for the institutional operation (p. 23); and section four reviews the seven federal requirements. The comprehensive standards for SACSCOC address mission, governance, institutional effectiveness, all educational programs, faculty, library and other learning resources, student affairs and services, financial resources, physical resources, substantive change procedures and policy, compliance with other Commission policies, and representation of accreditation status.

Student learning outcomes assessment appears in two parts of the Core Requirements. First, institutional effectiveness is required of the institution, so it reviews “institutional mission, goals and outcomes,” uses the information to improve quality, and shows that the institution is fulfilling its mission (SACSCOC, 2007, p.16). According to a SACSCOC representative, “Institutions are required to have an appropriate infrastructure to deal with institutional effectiveness: Core Requirement 2.5” (personal communication, July 10, 2009). Second, the QEP (Core Requirements 2.12) also address learning outcomes assessment. Above shows the 2007 version of 2.12, but on December 8, 2009 changes were made to requirement, see:

CR 2.12 The institution has developed an acceptable Quality Enhancement Plan (QEP) that includes an institutional process for identifying key issues emerging from institutional assessment and focuses on learning outcomes and/or the environment supporting student learning and accomplishing the mission of the institution. (Quality Enhancement Plan) (*Note: This requirement is not addressed by the institution in its Compliance Certification.*) (SACSCOC, 2009, p. 1)

Both focus on student learning, and the second appears to be a more succinct version of the first that allows for more flexibility.

Among the comprehensive standards, 3.3 focuses on Institutional Effectiveness and requires institutions to list, assess, and provide evidence of the results-driven improvements, with 3.3.1.1 focusing on “educational programs, to include student learning outcomes” (SACSCOC, 2007, p.25). This subsection of the standard shows that the expectations for student learning outcomes assessment are not only institutional but also programmatic, and that all programs must be assessed. Importantly, the word “outcomes” is plural, so it is expected that an institution would have multiple outcomes measures for each unit (Facilitator’s Notes, 2009, p. 15). Added in December 2009, clause 3.3.2 takes some of the original language about the QEP and places it in the Institutional Effectiveness category of the comprehensive standards; thus, the QEP is now in both the Core Requirements and the comprehensive Standards. The addition, 3.3.2, reads:

The institution has developed a Quality Enhancement Plan that (1) demonstrates institutional capability for the initiation, implementation, and completion of the QEP; (2) includes broad-based involvement of institutional constituencies in the development and proposed implementation of the QEP; and (3) identifies goals and a plan to assess their achievement. (Quality Enhancement Plan) (*Note: This standard is not addressed by the institution in its Compliance Certification.*) (SACSCOC, 2009, p. 1)

This change went into effect in January 2010. By embedding the QEP in both parts of the standards, the Commission has deepened the expectation.

Another standard implicitly addresses student learning outcomes assessment in its directive that institutions “identify college-level general education competencies and the extent to which graduates have attained them” (SACSCOC, 2007, p. 27, Standard 3.51). Learning outcomes assessment also emerges in the Federal Requirements (4.1); for instance, which recommends that institutions evaluate student achievement through examination “of course

completion, state licensing examinations, and job placement rates” (SACSCOC, 2007, p. 35).

While certain assessment-related items are listed in this section, SACSCOC does not indicate an exact way that institutions must assess student learning, beyond saying that “it must be ongoing, integrated, and institution-wide research-based planning and evaluation processes” (SACSCOC, 2007, p. 16). According to a SACSCOC representative, this practice “translates into requiring the institution to have an infrastructure that ensures that the scope of the standard is met” (personal communication, July 10, 2009). What SACSCOC typically sees is that

the analysis of results of assessment are handled by department/program faculty/deans and so forth, and that comes up usually to the planning committee or institutional effectiveness committee. Some are centralized and others are decentralized, so it’s up to [the institutions]. There is planning on what can be done; hopefully, this is connected to resource allocation. It may be the reallocation of funds, new moneys, or cut backs (which [institutions] have had to deal with in the last few years).

“Ongoing” denotes that more than one assessment cycle should be underway on a campus.

However, if the institution has reevaluated its assessment program based on results from the assessment, and it has a clear strategy for moving forward, one cycle could be justified

(Facilitator’s Notes, 2009, p.16).

Member institutions voted that SACSCOC should clarify what it looks for with regard to student learning outcomes assessment at the program level. At this point, while an institution “has course level information, [SACSCOC] is not asking for course level. [SACSCOC] is asking that they have clearly stated outcomes at the program level and that those outcomes should include learning outcomes” (personal communication, July 10, 2009). Typically, SACSCOC finds institutions list their programs with

a sampling of the learning outcomes for those units, and the instruments that they use or plan to use or have used, and then they provide a synopsis of the results and what they have done with the results in terms of continuous improvement, so [SACSCOC] asks them to close the loop by evaluating the results that have emerged and the tools. . . The issue of sampling is unsettling, because do you ask an institution to provide a sample for

three learning outcomes for all of their programs, or all the learning outcomes for part of their programs. That needs to be thought through, but we are not there yet. (personal communication, July 10, 2009).

SACSCOC does not specify which measures an institution should use, but it does “encourage institutions to use multiple measures” (personal communication, July 10, 2009). By doing so, “the multiple measures give rise to the notion of some indirect and direct measures, perhaps standardized tests as well as faculty developed tests, as different ways to get to the issue” (personal communication, July 10, 2009). SACSCOC states that information about multiple measures is communicated “informally” rather than “published,” even so it is confident that “it is in the culture that multiple measures is what you have to do” (personal communication, July 10, 2009). Although viewed as an acceptable measure, standardized testing is not either encouraged or discouraged. For instance, SACSCOC’s workshops will often highlight portfolios as a good practice while suggesting that “standardized tests may take away the creativity of institutions’ approaches to general education and outcomes” (personal communication, July 10, 2009). The Commission does not want its standards to “be the lever to push institutions to standardized tests” (personal communication, July 10, 2009).

Similarly, SACSCOC does not mandate organizational structure. However, the standards do carefully frame certain features of the process, which must be ongoing, institution wide, research based, and systematic. A SACSCOC representative explains that SACSCOC

tries very hard not to dictate particulars and lay them on institutions or an institutional structure, but [SACSCOC] does try to be clear on the expectations on what an organizational structure should produce, what it should have: it should be research-based; it should be on-going. Most institutions seem to like the fact that they have the freedom to create what is most meaningful and cost effective to them.

That student learning outcomes are intended to be used for quality improvement at the institution is demonstrated by the title of the program, QEP, as well as by the rationale for this program,

which centers on quality improvement. A SACSCOC representative states that “Closing the loop and using the information for improvement requires that there are some results for analysis and a consideration of what results mean and how they may be used” (personal communication, July 10, 2009). For instance, in regard to licensure or CPA exams, a SACSCOC staff member states:

SACSCOC sees institutions where their students are struggling with certain sections of those exams, and they ferret out where the weaknesses are and map it to their curriculum, so that they can see how they are treating those aspects of the curriculum; sometimes, they find out that they are not, or that it is a side issue in their curriculum; or their curriculum doesn’t support that outcome. That happens in many different areas.

This type of improvement is required, so all institutions must “show that they have analyzed the results of assessment and have put the plan in place as a result of that, and hopefully in their internal system, they would track the extent to which their changes were effective” (personal communication, July 10, 2009).

Public disclosure of learning outcomes assessment information is not mentioned in the Standards, though the integrity statement in clause 1.1 stresses that “The institution operates with integrity in all matters” (SACSCOC, 2007, p. 11). Under this policy, SACSCOC states:

evidence of withholding information, providing inaccurate information to the public, failing to provide timely and accurate information to the Commission, or failing to conduct a candid self-assessment of compliance with the *Principles of Accreditation* and to submit this assessment to the Commission, and other similar practices will be seen as the lack of a full commitment to integrity. (SACSCOC, 2007, p. 11)

While this policy does not directly address student learning, it underscores the need to be clear with the public about the accreditation process and implicitly links student learning to transparency. As a result, much of the QEP, which is focused on student learning, is available to the public. A SACSCOC representative explains that the QEP was designed to both promote institutional planning as it relates to student learning, but also serve as a compliance function.

While SACSCOC does not have a standard exactly on institutional transparency, it does “verbally encourage institutions to be transparent. We as an organization work on our

transparency. We all have an obligation to be transparent” (personal communication, July 10, 2009).

SACSCOC does not have a clear expectation for faculty participation in assessment in its Standards, although the Commission does expect faculty to be engaged with the academic process, including quality and effectiveness. Additionally, while both the faculty and administration should be involved (3.4.1), “The institution places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty” (SACSCOC, 2007, p. 27, Standard 3.4.10). Even if not mandated in the standards, the faculty role is instrumental in the academic program, and as much is assumed in assessment. In other words,

faculty are involved with the effectiveness of curriculum. The whole purpose of the curriculum is to deliver the program outcomes that will be measured. The peer reviewers read the minutes of the faculty meeting and if faculty are not involved in the curriculum design or evaluation, then that institution may receive a recommendation.

In addition to faculty, “student services make a contribution to the student learning outcomes, so student services leaders should be working in cohort with the faculty” (personal communication, July 10, 2009 and Core Requirement 2.10). Nothing in the standards suggests the involvement of institutional governing boards with learning outcomes assessment.

Student Learning Outcomes Assessment Resources. SACSCOC provides information on student learning outcomes assessment on its web page (www.SACScoc.org), including highlights and handouts from the Annual Meeting. Student learning outcomes assessment can also be found in the *Principles of Accreditation: Foundations for Quality Enhancement*, particularly in Standard 2.12 of the Quality Enhancement Plan.

The principle venue for communication with its members is the Institute on Quality Enhancement and Accreditation. This institute’s focus on student learning outcomes assessment is evident in the choice of keynote speakers, including George Kuh from the National Institute

for Learning Outcomes Assessment, and in the number of breakout sessions concerned with student learning outcomes assessment issues such as assessing undergraduate programs and general education; linking teaching methods and student learning outcomes; and defining, assessing, and documenting student learning at senior institutions as well as community colleges. Furthermore, close to a dozen institutions discuss assessment on their campuses, and in so doing, act as “good practice” institutions. The annual meeting also serves as a forum for addressing the relationship of the standards and student learning outcomes assessment. SACSCOC also has Institutional Effectiveness Peer Evaluator Training Workshops. These workshops use a frequently asked question model to help peer reviewers explicate—and thereby better understand—the meanings of the standards.

To supplement the workshops, the president of the Commission, began the Small College Initiative, one or two-day workshops that take place each spring. This initiative “grew out of the analysis of the challenges that the smaller institutions were having culminating the standards for accreditation” (personal communication, July 10, 2009). Differently topics are chosen each year, and a past one focused specifically on student learning outcomes. SACSCOC considers training a “big issue” and is providing additional training activities on a regular basis, including offer sessions on institutional effectiveness to evaluation leaders (personal communication, July 10, 2009). Of course, not all training sessions focus specifically on student learning outcomes. Some look more broadly at accreditation.

Peer review. The Southern region has over 4000 peer evaluators and institutional presidents can select their institutions’ reviewers based on the reviewers’ specialties. The Quality Enhancement Plan (QEP) indicates that institutions can select an individual with special qualifications in an area to be part of the evaluation team, and as long as no conflict of interest is

apparent, that person consults with the team about the institution's QEP. Evaluators do not have to be from an institution of higher education or from the southern region, although most of them are from this region.

The evaluation team is trained by a director of training and research on the SACSCOC staff. Workshops are provided for the specific area evaluators on topics such as institutional effectiveness, finance, and student support services. A wider range of such workshops is in development. SACSCOC representative states,

A real important goal for us is to have a broad base of involvement, so we can spread the understanding, spread the word, so that people from this institution serving on the team can learn what's best and worst about this institution and be informed when they go home. But that creates a challenge, because you really have to have a strong training program and you are training all the time. (personal communication, July 10, 2009)

SACSCOC now includes at least one team member who is specialized in the designated "learning areas" in each visit. (2007, CRAC Summary of Changes in Regional Practice).

Accreditation Actions. The exemplary schools at SACSCOC have "clearly and appropriately stated outcomes" and involvement from various stakeholders in the learning process ranging from faculty to student service staff. Besides stating outcomes, campuses explain how their multiple assessment measures align with their stated learning goals. Then, they discuss "the evaluation of results and an evaluation of those results for implications for the next round of assessment"; or put simply, how they will use the assessment results. This process is "tied into the budgeting process, which is very important" (personal communication, July 10, 2009).

When SACSCOC requests a follow up, imposes sanctions, or drops an institution from accreditation, it typically does so for a combination of reasons. Even so, "Institutional effectiveness is challenging for [SACSCOC] institutions...." (personal communication, July 10, 2009). A recommendation from SACSCOC is significant. A recommendation on a Core

Requirement means an institution's accreditation will not be reaffirmed for at least ten years, and the school will likely be placed on sanction, probation, warning until it rectifies its compliance. On the other hand, if an institution receives a recommendation on the Comprehensive Standards, it could result in not being reaffirmed, but it does not usually (personal communication, July 10, 2009). Examination of the QEP follows a different model, in which the team serves almost as a consultant, so it is "not unusual for institutions to list five to ten suggestions on how the institution may improve the plan, or explain the issues that might come up in year two or three, for instance." Even so, "in order to avoid recommendations on the QEP some institutions are thinking narrowly; the institution would be better served if it were more innovative."

Most of the recommendations relate to Institutional Effectiveness, Standard 3.3.1; for instance, in December 2008, 18 out of 32 or 56% of institutions had follow-ups on program learning outcomes. In fact, in the last few years, 63% to 78% of the institutions up for review have received recommendations, which mean the institutions have follow up, with regard to the QEP standard (personal communication, July 10, 2009). In 2008, 69% of the institutions reviewed for accreditation were found noncompliant in the area of Institutional Effectiveness 3.3.1 for the off-site review. During the on-site review, 56% received recommendations, and another 36% were being monitored per the final review. In 2007, 60% of the institutions reviewed for accreditation were found noncompliant in the area of Institutional Effectiveness for the off-site review. The on-site review earned 41% recommendations, and the final review ended with 36% of the institutions being monitored. In 2008, 78% of institutions received recommendations relating to Standard 2.12, and 16% were being monitored. For the same standard in 2007, 73% of institutions received recommendations, and 22% were being

monitored. The clauses related to student learning outcomes assessment led to more institutions receiving recommendations and monitoring than any other part of the Standards.

SACSCOC explains that it provides “a nice long trail between the evaluator’s report and the eventual decision that is designed to enable the institution to get into compliance if it is not” (personal communication, July 10, 2009). First, an off-site review committee reviews compliance information, and send its report on compliance or non-compliance to the institution. The institution has five to six months to submit a focused report that addresses the deficiencies mentioned. At that point, the on-site committee visits the campus and reviews the report to gauge compliance with the standards. If the campus does not address the situation satisfactorily, then the institution will receive a recommendation. The institution has another five months to respond to the recommendation. SACSCOC stays away from dictating specifics, so the recommendation would be very general. These examples, for instance, were pulled from letters:

CS3.5.1 The Committee recommends that the institution provide evidence that college-level competencies have been identified for the general education core, and that graduates have attained these competencies.

Recommendation 1: The Committee recommends that the institution provide evidence that all of its programs and services have undergone formal planning and evaluation processes and that the findings from these assessments have been used to make continuous improvements.

Recommendation 2: The Committee recommends that the College provide evidence that faculty members establish and approve program learning outcomes.

Recommendation 3: The Committee recommends that the institution provide evidence that graduates have attained the general education competencies.

The following example comes from a letter of institutions being monitored for student learning:

CS 3.3.1 (Institutional Effectiveness), Recommendation 2

At the time the institutional response was submitted, the first cohort of students had not yet completed their program. A further report is requested and should include the results of the assessment of student learning outcomes for the entering cohort of students who completed their program in spring 2007.

These examples provide evidence that the institutions are being held accountable for their efforts with student learning outcomes assessment.

Summary. This region has a higher number of public institutions than private ones, and has a higher number than the rest of the regions of HBCUs and faith based institutions. SACSCOC has been involved with student learning outcomes assessment since the 1980's with the development of the QEP. This accreditor has a strong focus on quality, and expects for institutions to list student learning outcomes, assess them, and provide evidence. This evidence should be used for institutional improvement. The faculty should be involved in creating and maintaining the quality of the academic program, but yet there are no direct statements that faculty need to be involved in student learning outcomes assessment. SACSCOC also does not mention the transparency of the learning outcomes assessment information, except through the integrity statement. Even so, the QEPs are public documents.

Western Association of Schools and Colleges Accrediting Commission (WASC)

The Western region includes two separate accreditation Commissions. One, Accrediting Commission of Senior Colleges and Universities (ACSCU), accredits institutions that offer at least a baccalaureate degree, and the other, Accrediting Commission of Community and Junior Colleges (ACCJC), accredits institutions that offer an associate's degree. It shares the same basic history and purpose, but have different bylaws and standards. This brief introduction provides an overview of both Commissions before the ACCJC and the ACSCU information is reviewed separately.

Background. An organization of Californian institutions started in 1924 at Pomona College in California. Before this date, a few colleges and universities would meet occasionally,

chiefly to discuss “athletic problems” (Briggs, 1959, p. 69). The president of Pomona College, James A. Baisdell, believed that meetings of area institutions would benefit professional development in the region, so he initiated the Southern California Association of Colleges and Universities, which in 1942 expanded to include institutions beyond California and became the Western Association of Colleges and Universities. The group’s purpose included arranging meetings and other activities, at which institutional faculties and staffs, regardless of rank, had opportunities to experience various forms of

intellectual stimulus and to have pleasant social relationships; to share ideas and ideals of all types of educational problems, local, national, and international; and insofar as possible, to follow up such study by courses of action which were in harmony with the needs and interests of its members and affiliates. (p. 69)

The group was also intended to promote institutional cooperation within the association and its various constituents in the region. Besides colleges, the Western Region included other “noncollegiate institutions of higher education, such as the Huntington Library” and even residents interested in higher education (p. 70). The annual meetings were held in conjunction with other organizations, such as the Institute for World Affairs, thereby making it easier for the Association to bring in international speakers and musicians, and foster the social aspect of the meetings. In 1941, 3000 people attended the annual meeting (p. 70).

The Association was invited by the American Council on Education to become a member, and had representation on the National Committee on Accrediting and on the National Committee of Regional Accrediting Agencies (p. 70). In October 1948, the Western College Association voted to fulfill the national need for a regional accreditor in the Western region, and in 1949 the Association became one of the six regional accreditors. By the summer of that year, accreditation standards had been adopted and college visits began. Five years later, all colleges had been reviewed for accreditation (p. 70).

Three underlying purposes served as the foundation for accreditation in the Western region: providing a list of approved institutions, making assessment an impetus for institutional improvement, and allowing for evaluation teams to learn about other institutions through campus visits. At this time, the Western region based accreditation on the following principle: the “overall character of the institution is sound, and that, within the limits of its own program and expressed purposes, it has the facilities, the manpower and the will to do a successful job” (p. 71). The Association was originally only open to four-year institutions, but in 1952 it began to accredit “public and private junior colleges” (p. 71). The result, though, was two separate Commissions, WASC–ACSCU, or senior, for baccalaureate institutions and WASC-ACCJC, or junior, for associate’s degrees.

Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges (WASC-ACCJC)

WASC-ACCJC’s purpose is to evaluate its members in order to

assure the educational community, the general public, and other organizations and agencies that an institution has clearly defined objectives appropriate to higher education; has established conditions under which their achievement can reasonably be expected; appears in fact to be accomplishing them substantially; is so organized, staffed, and supported that it can be expected to continue to do so; and demonstrates that it meets Commission standards. The Commission encourages and supports institutional development and improvement through self-study and periodic evaluation by qualified peer professionals. (WASC-ACCJC, 2007)

Significantly, this statement provides an overview of Commission's expectations for itself as well as for its constituents.

Demographics. This accreditation organization, headquartered in Novato, California, accredits associate degree granting institutions in California, Hawaii, the Territories of Guam and American Samoa, the Commonwealth of the Northern Mariana Islands, the Republic of Palau,

the Federated States of Micronesia, and the Republic of the Marshall Islands. As with other regions, the functions of the organization are carried out by a Commission, here consisting of 19 members, a group of peer evaluators, and a small staff. The staff assists institutions in understanding the requirements for accreditation and supports the decisions of the Commission, but its members do not vote on accreditation (personal communication, July 16, 2009).

Even though this region perhaps appears smaller than others, the 132 institutions educate approximately 3 million students annually (personal communication, July 16, 2009).

Significantly, Western is the only region to separate Associate degree granting institutions from the baccalaureate degree granting institutions and the ACCJC is shaped by its strong engagement with issues and concerns related to its associate degree constituents. The narrow focus of this Commission means its standards are tightly aligned with its relatively homogeneous institutions. Because the institutions are teaching and learning institutions, neither they nor the Commission focus on research or service. As a result, the “standards are very learning outcomes oriented” (personal communication, July 16, 2009); while at the same time, they share many of the features of Standards in the other regions in style and scope.

The majority of institutions in the region are in California, so the state’s makeup has a strong influence on the region. Moreover, because its population is very diverse and its faculty unions are strong and influential, California state policies have influenced higher education at large. The union mindset in California has meant that faculty unions have been “very outspoken” with regard to various elements of higher education including “finances, governance, curriculum, and learning outcomes assessment” (personal communication, July 16, 2009). Regardless, the field may only officially respond to the standards during revisions and not on a day to day basis (personal communication, July 16, 2009).

Student Learning Outcomes Assessment Information. Staff at the ACCJC said the Commission “recognized the nationwide trend on assessment and recognized the value” of included assessment in its Standards (personal communications, July 16, 2009). The Commission sees the value of assessment as a way for the “improvement of student learning and institutional effectiveness” (personal communications, July 16, 2009). When setting up student learning outcomes assessment, its goal was not to be prescriptive but to promote the idea that assessment involves a range of strategies, such as rubrics and portfolios. The Commission representatives explained that it received “some pushback on student learning outcomes assessment.” Yet, institutions realize that through assessment they can find out if “students are not meeting the goals, or are not meeting the expected outcomes of the course” (personal communications, July 16, 2009). This information allows the institutions to make changes to “textbooks, to instruction, to curriculum, to facilities, and to student services,” for instance. The staff sees that the institutions then implement the changes, and see how the learning is influenced. For that purpose,

the changes could take a hundred different shapes and forms. The cycle should be continuous, and institutions should always be asking, “How well are we doing? How well are our students learning? How well are they achieving what we set out, what we expected that they would learn?”(personal communication, July 16, 2009)

One of the main struggles for all the parties involved with assessment is that institutions “mistake objectives for outcomes; and with evaluation for assessment.” Institutions often believe that “just because a student gets an ‘A,’ that they have done assessment; they are moving slowly” (personal communication, July 16, 2009).

Standards. The WASC-ACCJC *Accreditation Standards* have an entire standard, dedicated to student learning but student learning outcomes assessment pervades all four standards. The standards speak about student learning and about how assessment should be a

mission-centered activity supported through institutional resources; they also indicate that institutional leaders should be engaged with the assessment process. Standard II—the one entirely focused on learning outcomes assessment—states that, “The institution offers high-quality instructional programs, student support services, and library and learning support services that facilitate and demonstrate the achievement of stated student learning outcomes” (WASC-ACCJC, 2009, p.17). The Commission requires that “Instructional programs are systematically assessed in order to assure currency, improve teaching and learning strategies, and achieve stated student learning outcomes” (p.17, Standard II.A). The language related to student learning outcomes assessment and its use is strongly foregrounded within these statements and throughout the document.

The standards ask that institutions identify student learning outcomes. The Commission provides its own definition of student learning outcomes at the end of the document: “knowledge, skills, abilities, and attitudes that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences” (WASC-ACCJC, 2003, p. 29). This definition implies that student learning outcomes must be clearly connected to the mission of the institution, so making such a connection is a concern that would also be folded into an institution’s definition of its student learning outcomes. In addition, WASC-ACCJC says that students should be able to demonstrate knowledge related to their respective programs, and that the institution itself “provides an environment that supports learning, enhances understanding and appreciation of diversity, and encourages personal and civic responsibility as well as intellectual, aesthetic, and personal development for all of its students” (WASC-ACCJC, 2009, p. 17).

The standards focus on the course-level, program-level, and certificate/degree-level learning outcomes, as indicated by Standard II.A.1.c (p. 17) and by Standard II.A.2.f, which states that “The institution engages in ongoing, systematic evaluation and integrated planning to assure currency and measure achievement of its stated student learning outcomes for courses, certificates, programs including general and vocational education, and degrees” (p. 19). Even so, the Commission does not offer a specific strategy for assessing these outcomes, only the guideline that students should be prepared to “meet employment and other applicable standards and are prepared for external licensure and certification” (p. 20). While the Standards indicate that institutions need to focus on the course, program, and institutional level, institutions that have “started at the institutional level have had an easier time of it, than those who started at the course level” (personal communication, July, 16, 2010). Regardless, according to an ACCJC representative, it “doesn’t matter if learning outcomes assessment comes from the bottom up or up down, because how the institution gets there is not prescribed” (personal communication, July, 16, 2010).

Institutions are required to use the student learning outcomes assessment information for improvement, and as much is stated in Standard II. A: “Instructional programs are systematically assessed in order to assure currency, improve teaching and learning strategies, and achieve stated student learning outcomes” (p. 17). Standard II.A.1.c adds that institutions should “use assessment results to make improvements” (p. 17). These standards discuss the use of assessment results as well as the disclosure of the outcomes pointing out that they should be “available to appropriate constituencies” (p.19). The Commission’s philosophy is that assessment “needs to be on-going and systematic” and it understands that certain fields may be on different cycles (personal communication, July 16, 2009). Representatives provided two anecdotes, the first of

which compares a nursing program to a music program. A nursing program may change more often than a music program, but if a “program was only reviewing its learning outcomes every twenty years or had not reviewed the course outlines in fifteen years, the Commission would take note” because the “cycle needs to reflect the pace of the students program, which is only ever two years.” In this case “assessment and improvement may need to be on a tighter schedule, but this wouldn’t be a ‘recommendation.’” The basic idea is that there is a progression where outcomes lead to assessment, which in turn leads to improvement.

The second anecdote links assessment and improvement at one institution’s math department:

The program felt that its math sequence from remedial introduction to algebra wasn’t working; the drop-out rates were high, and students were doing poorly at the upper levels; they made changes to their curriculum, where they added a course, broke a course in half and made changes. They saw improvement as evidenced by the fact that more students are getting through the curriculum. (personal communication, July 16, 2009)

Instances such as this one, the representatives say, always lead to improvements and to increased student success. ACCJC staff says that a lot of assessment activity is happening in different pockets of institutions, but when the entire institution is actively involved in student learning outcomes assessment, then the institutions will be at the level of “sustainable continuous quality of improvement” (personal communication, July 16, 2009).

The public disclosure of the information is seen to be an issue of institutional integrity. Each of the government jurisdictions in this region has different requirements, and California, in particular, has transparency requirements for its public institutions. Nonetheless, ACCJC posts sanctions online, and it requires the institutions to make the team report and action letter available to the public. Pertinently, the eligibility requirements for accreditation include the item:

10. STUDENT LEARNING AND ACHIEVEMENT

The institution defines and publishes for each program the program's expected student learning and achievement outcomes. Through regular and systematic assessment, it demonstrates that students who complete programs, no matter where or how they are offered, achieve these outcomes. (WASC-ACCJC, 2004, p. 2)

Every institution is expected to publish student learning outcomes to be eligible for accreditation. In addition, the Standards say that institutions should provide “clear and accurate information” to all of its students about courses and programs, and at the course level all students should receive a syllabus that states the learning outcomes for the course (p. 8, Standard II.A.6). Still, the eligibility requirement only refers to program-level outcomes and the Standard, though, mentions providing information to students, does not require publishing the information.

The Commission does specify that faculty need to be involved in defining student learning outcomes or, at least, in working with committees as they “identify competency levels and measurable student learning outcomes” (p. 18). Importantly, the next sentence reads that the “institution” assesses learning outcomes. ACCJC maintains that “assessment is faculty driven” and that “faculty own the curriculum” (personal communication, July 16, 2009) and the standards directly address the faculty, as stated in Standard II.A.2.a. and Standard II.A.2.b. In the Standard on leadership, the roles of many constituents are embedded in the learning outcomes assessment responsibilities, faculty responsibilities are highlighted: “The institution relies on faculty, its academic senate or other appropriate faculty structures, the curriculum committee, and academic administrators for recommendations about student learning programs and services” (p. 32). According to ACCJC staff, the faculty unions fought the standard on student learning outcomes assessment that made faculty directly responsible for student learning (personal communication, July 16, 2009). ACCJC states that while the faculty were “contentious in 2002,”

they “now faculty have recognized their leadership in this area and the central role that they play” (personal communication, March 16, 2009).

The expectation for the institutions’ presidents is to “guide institutional improvement of the teaching and learning environment” to “achieve student learning outcomes” through the creation of a culture conducive to assessment (p. 34). The Standards indicate that “the governing board has ultimate responsibility for educational quality, legal matters, and financial integrity” (p. 24). All levels of leaders at the institution are expected to focus on institutional improvement as it relates to, among other things, learning (p. 34).

Student Learning Outcomes Assessment Resources. The ACCJC web page (www.accjc.org) has little information on student learning outcomes assessment. The only three areas where student learning outcomes assessment can be found are in the section on in the newsletters, on the workshops, and in the Standards themselves, with one set of Standards, as previously noted, specifically outlining student learning outcomes assessment information. In conjunction with WASC-ACSCU, ACCJC offers workshops to its members on student learning outcomes assessment. Workshops at two levels, Assessment I and Assessment II, are offered twice each academic term. The first level offers general information about undertaking assessment of general education, the major, or the co-curriculum, as well as ways to analyze the data and use it for improvement. The Assessment II workshop covers more advanced topics such as strategies for engaging the educational community in the process, ways to cultivate a culture of evidence, and uses for quality improvements (WASC-ACCJC, 2009). These workshops are team based, so an institution sends a team trying to improve some aspect of student learning on its campus with the hope that the workshop will aid them. Though these workshops are available for both WASC ACSCU and WASC ACCJC, they are customized for attendees from the two-

year institutions, with the rationale that “learning outcomes assessment will be a little different for these institutions” (personal communication, July 16, 2009). Mostly, those attending the workshops are already engaged with the topic of learning outcomes, but even so they are designed to be user friendly. As an ACCJC representative noted, “if a school needs help, [ACCJC] provides that help” usually through a conference call or a visit to the campus. A Commission staff member says that “the Commission is not there to “Getcha!” but we will be helpful. We’re not here to tell you how to fix this either because it is not a one-size-fits-all model.” In spring 2009, more than 200 faculty, staff, and administrators attended the workshops.

Peer Review. Unlike the other regions, ACCJC has a six-year cycle, in which “each institution goes through a 2-year period of self-study, that is mapped to the standards, and it demonstrate how it has met the standards, and it make plans on how to improve” (personal communication, July 16, 2009). The peer review teams include faculty, administrators, student services staff members, researchers, trustees along with experts in distance education, program review and learning outcomes assessment. An expert in program review and student learning outcomes assessment is selected on the basis of current job responsibilities related to this type of work or past exemplary service on a review team. The team is selected from a database of 2600 people, of which 1800 are regulars who participate in a visit every eighteen months to two years (personal communication, July 16, 2009). All the team members receive training concerning procedures for conducting a site visit. During such training, ACCJC staff also communicates other necessary information to the team, including particular information about the institution or its process.

Accreditation Actions. In September 2007, each institution was sent a “Rubric for Evaluating Institutional Effectiveness” to aid in self-description and “provide a developmental

framework for understanding each institution's actions toward achieving full compliance with standards" (Beno, 2009, p. 1). The rubric provides examples of ways that institutions may fulfill the expectations at four levels: awareness, development, proficiency, and sustainable continuous quality improvement. The Commission expects that institutions will progress toward complete compliance, or the "Sustainable Continuous Quality Improvement Level," in all areas except Student Learning Outcomes, which is the newest edition to the standards. The Commission estimated that it would take "eight to ten years to come into full compliance with the new standards on student learning outcomes assessment" (p.2); therefore, institutions will need to be at the proficiency level with this requirement by Fall 2012. Some examples of compliance include an ongoing and systematic assessment program, institutional dialogue linked to program reviews, and so on.

The job of the peer review team is to "verify that the assertions in the self-study report are true, and then write a report that is forwarded to the Commission" (personal communication, July 16, 2009). If the team report does not verify that the institution meets the standards and the commission policies, then the institution would receive a follow-up made by the visiting team. The teams look for evidence that the institution is identifying student learning outcomes, that they are collecting evidence, and that they are making modifications. Still, the institutions are not yet required have all of those elements, because they have until 2012 to become compliant with the student learning outcomes assessment components of the standards. The team members are told "to be open minded when they visit a campus and to not expect to see what is at your institution" (personal communication, July 16, 2009).

While institutions do have until 2012 to achieve compliance, the schools are expected to be making observable progress, so the peer reviewers look for evidence of progress in the self-

reports and visits. At this point, no reports have indicated that institutions “don’t agree with the learning outcomes or . . . with the assessment strategy” (personal communication, July 16, 2009). The rubric provides information about what institutions should do to be proficient by 2012, and while “some schools are doing very well already, and others are struggling,” teams go in with the rubric and try to figure out where institutions fall short in terms of its requirements. Letters now often state that the “institution has made progress but needs to accelerate to get to speed by the 2012 deadline. One hundred percent of schools are about 50% done, with the Nursing, Technical, and Career schools further ahead.” Nevertheless, no institution is at the level of being at compliance even though there is a short deadline for them to come into compliance. The Commission staff says, that “2012 is the finish line” for student learning outcomes assessment issues, but at the same time it a “start line” because at that point, student learning outcomes assessment should be part of the culture (personal communication, March 16, 2010).

Summary. WASC-ACCJC is unique that it only accredits associate-degree granting institutions. Most of the institutions in this region are from a single state, California. The Commission created Standards for learning outcomes assessment in 2002, but gave the institutions until Fall 2012 to comply with those standards, believing that the institutions would need the ten years to build assessment on campuses. Nonetheless, institutions were to begin developing assessment immediately, and receive recommendations to accelerate their efforts if they do not look like they will be in compliance by the deadline. ACCJC requires for student learning outcomes to be identified and expects faculty to be involved in creating the outcomes. The primary purpose for learning outcomes assessment is for improvement. Information about the accreditation process (i.e., team report and accreditation letter) is expected to be made public, as well as program learning outcomes and that they are achieved.

Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC-ACSCU)

ACSCU, when defining the intentions of the accreditation process, identifies many of the general assumptions already established about accreditation, such as its role in quality assurance, but it also emphasizes the promotion of “institutional engagement on issues of educational effectiveness and student learning” (WASC-ACSCU, 2008, p. 2), developing and sharing good practices related to “assessing and improving the teaching and learning process;” shaping and applying standards that improve the educational quality through a constant evaluation process of the standards themselves; and promoting the creation of a “culture of evidence” at the institutions (WASC-ACSCU, 2008, p. 2). This philosophy seems to fit with the three chief goals that the Commission lists on its website, namely to:

- Promote institutional engagement in issues of educational effectiveness and student learning
- Develop a culture of evidence that informs decision making
- Foster active interchange among public and independent institutions

Moreover, ACSCU underscores “the active interchange of ideas among all institutions to improve institutional performance, educational effectiveness, and the process of peer review” (WASC-ACSCU, 2008, p. 2). Its intention is to foster such exchange while reducing the burden of accreditation for and adding value to institutions in its region.

Demographics. This accrediting organization, headquartered in Alameda, California, accredits colleges and universities offering at least a baccalaureate degree or higher in California, Hawaii, Guam and the Pacific Basin. Like the other regions, ACSCU has three main groups that serve the functions of the organization, included 25 elected Commissioners, peer reviewers, and the staff. The staff members of this Commission are “partners in the process” with the institution,

so the five Associate Directors and the Executive Director each have a portfolio of institutions with which they are regularly in touch (personal communication, July 17, 2009). One Associate Director has a strong background in student learning outcomes assessment, and she designs the assessment workshops and annual meeting.

Because most of its institutions are in California, the region is strongly influenced by the state's policies. This region has a very diverse population. It is an open and progressive in parts, while at the same time being very conservative in other parts (personal communication, July 17, 2009). The region has more private institutions (75%) than public institutions (25%), but the public institutions educate almost 70% of the students in this region. Of the privates, there are only a "handful" that are considered "elite" (personal communication, July 17, 2009), but many of the public institutions are very well-regarded, such as University of California Berkeley.

Student Learning Outcomes Assessment Information. In 1996, Ralph Wolff, the president of ACSCU, wrote *Invitation to Dialogue*, a book about making student learning outcomes assessment a central part of accreditation standards. While the reauthorization of the Higher Education Opportunity Act of 1988 required accreditors to look at student learning outcomes assessment, it was not until 1996 that it gained much attention on the part of ACSCU, which then wanted to become a leader in this area (personal communication, July 17, 2009). Within about five years, a set of standards were created that had assessment woven throughout. These new standards went into effect in 2001, but were not in "full force" until 2003. Because ACSCU has a maximum 10-year term of accreditation, all of the institutions will not be through the process until 2013.

ACSCU operates by means of a three stage process, in which the institution first submits a proposal, then has a capacity visit, and finally has an educational effectiveness visit, during

which “at least one theme has to be on the direct assessment of student learning.” In their proposals institutions address:

How they want to use the ACSCU process to examine student learning outcomes assessment? To improve something about their system for student learning outcomes assessment? To encourage more departments to examine program learning outcomes? To get more widespread involvement to build capacity to do assessment? For example: they could say a lot of our departments are doing capstones, but it varies wildly, a theme then could be harnessing the capacity of our institution for offering capstones to make it relevant to all majors and to really unleash the potential of capstones to be an effective assessment tool. They would figure out what the capacity dimensions of that would be, what departments need to inaugurate capstones, or to train faculty to offer them or develop outcomes for them, what are their benchmarks for effectiveness going to be 18 to 24 months later when the team returns for the effectiveness visit. They lay that out in their proposal, and then they are under an obligation to fulfill what they are committed to at Capacity and Educational Effectiveness stages. They would have their own theme, but [ACSCU] asks the same questions at every institution that [they] visit. These are generic kinds of questions that cover our standards. (personal communication, July 17, 2009)

At first, institutions’ perceptions of the capacity visit was narrowly defined because they thought of it as finances. The AASCU staff say that

Student learning and educational effectiveness have dimensions in both the capacity and the effectiveness stages of the review. It’s taken a few years for people to understand that it is not a content matter, but a perspective question on student learning. (personal communication, July 17, 2009).

For the capacity visit, student learning outcomes is tied to the question: “are there student learning outcomes adopted by the faculty and published somewhere?” By contrast, for the effectiveness visit, the question would be, “Are students achieving them [the desired outcomes] and at what levels?” (personal communication, July 17, 2009).

By separating the capacity visit from the educational effectiveness visit, the later visit became focused on student learning outcomes assessment and educational effectiveness. Prior to this process, ACSCU was being criticized for being too regulatory and bureaucratic, while at the same time offering little value (personal communication, July 17, 2009). According to ACSCU representatives, the Commission leveraged this sentiment, suggesting that the new process would

actually be more collaborative and serve to increase value, and indeed, the Commission's intended outcomes are to facilitate collaboration between ACSCU and the institutions, and to add value to educational experiences in the region. ACSCU representatives shared this information about the institutions' reactions to the process:

By allowing institutions to pick themes for their proposals that are relevant to them, they are more invested in using the process and doing what they are doing anyway. There were a lot of things happening in that 5 year development period that made it more palatable for the institutions and that allowed for the creation of the three stage process with an emphasis on student learning outcomes. There's still some push back. Most who go through it really appreciate it. As we reach the point where more than half of our institutions have gone through the entire process, they understand that what we really want is what is good for them and builds value for them, and supports their strategic plans. They have come to realize that this process is long and fatiguing but ultimately worthwhile if approached in the right spirit. That's not to say there isn't still resistance, especially now with budget problems on every front. A lot of folks are wondering if we can't go back to a single visit model. (personal communication, July 17, 2009)

These representatives added that certain institutions are ahead either because the leadership and interest were present, or because the institutions were teaching centered.

At this point, AASCU representatives see that most institutions are in the process or development stages of learning outcomes assessment. ACSCU provided two examples to illustrate institutional activities. First, an art college in the region grew its assessment out of its "culture of critique." While students were used to receiving feedback, the faculty were not used to aggregating that feedback to the program level or working with outcomes. Instead, the faculty believed they knew good work when they saw it. However, by thinking of such feedback in terms of assessment purposes, they learned how to make outcomes explicit and how to aggregate data on learning. Another example of a successful institution was a non-denominational seminary, which focused on spirituality and spiritual formation. The Association of Theology Schools has prepackaged outcomes that the school used as the basis for an end-of-program project. The faculty developed a rubric and a system for defining inadequate to outstanding, and

it assessed the capstone project prepared by its graduates based on the rubric. As the faculty aggregated the individual assessments, they found that most students were not achieving one outcome at an adequate level, so they went back and had campus-wide meetings on this topic: How do we address improving student learning on this outcome?

When asked for more examples, ACSCU representatives elaborated by saying that there are plenty of good examples throughout the region in departments and programs, but the practices do not “permeate the whole campus.” They see that

Program goals seem to be somewhat easy; general education is a little harder, but institutional level goals have been more challenging, and a number of our action letters have asked for more work on these. Co-curriculum work needs to be assessed in light of learning outcomes as well. The academic side needs to work more with the co-curriculum side, figuring out how these areas cross and how to look for evidence of learning, not only in the curriculum, but also in the co-curricular areas. What can be derived from the whole experience of the student? (personal communication, July 17, 2009)

Further, they explained that the assessment process had reached a critical stage:

assessment has been around long enough that you can see when attention gets diverted by financial crisis, leadership, or new strategic plan that leads the campus in a different direction. ACSCU is really trying to create something new that is not going to work unless it strikes deep roots and can flourish in a supportive ecosystem. The institution has to create a total environment in which the focus on student learning and improving student learning continues and works. For the first 20 years in the assessment movement there was a more superficial idea of what needs to be done; it’s been more mechanical: we’ll collect this data, we’ll use this test, we’ll send off that report, but there hasn’t been a complex understanding of the total infrastructure of what it takes to get it established and keep it working to the point that it actually yields benefits. We’re just getting to that level of understanding. (personal communication, July 17, 2009)

The need to promote this “level of understanding” is currently driving ACSCU initiatives. The Commission is focused on what is being done with the findings and moving beyond that to questions such as, “What do you think of the findings? Are they good enough? What are you going to do about it?” (personal communications, July 17, 2009).

Because the institutional outcomes are more difficult for institutions, ACSCU is taking a closer look at program reviews starting in fall 2009. It wants to see if there is a set of learning outcomes listed for each program, and the ways that the program is assessing them. In addition, ACSCU is concerned about how planning and budgeting adjustments will be made to accommodate institutional improvement based on assessment results. In responses to these concerns, ACSCU suggests that institutional leadership necessarily plays a key role in the implementation learning outcomes assessment initiatives.

Standards. The WASC-ACSCU *Handbook of Accreditation 2008* provides 1) a holistic overview of expectations in four standards and sub-categories of the standards to assist with defining standards; 2) criteria for review, which are key areas to review under the standards; 3) guidelines, which describe methods for meeting the standards; and 4) related commission policies.

ACSCU has four Standards for Accreditation: Standard I: Defining Institutional Purposes and Ensuring Educational Objectives; Standard II: Achieving Educational Objectives through Core Functions; Standard III: Developing and Applying Resources and Organizational Structures to Ensure Sustainability; and Standard IV: Creating an Organization Committed to Learning and Improvement. While most expectations about student learning outcomes assessment are concentrated in Standards II and IV, elements of student learning outcomes assessment permeate the standards. In Standard I, the Association speaks to the necessity of having clearly stated purposes and educational objectives at the course, program, and institutional levels. Standard II is about curriculum and student learning outcomes assessment. The main Standard itself reads:

The institution achieves its institutional purposes and attains its educational objectives through the core functions of teaching and learning, scholarship and creative activity, and support for student learning and success. It demonstrates that these core functions are

performed effectively and that they support one another in the institution's efforts to attain educational effectiveness (p. 14).

As such, this Commission identifies the relationship of student learning to core functions as a key element in accreditation. The third Standard specifies that a clear organizational structure and support system needs to in place to guarantee effective academic programs. The fourth Standard is concerned with the planning processes for student learning outcomes assessment and, in particular, with whether or not the institution has the capacity, the leadership and the involvement of key stakeholders necessary to implement their plan.

While ACSCU expects a clear organizational structure, it supports the institutions that desire to build on present activities. ACSCU representatives say that institutions do not need to add commercially available/standardized tests to assess student learning but to look at what they are already doing in courses. If programs already submit annual reports at their institutions, they should insert findings from assessment into those reports. ACSCU advocates the view that “the more you can embed into what is already going on, the less burdensome it is” (personal communication, July 17, 2009).

ACSCU requires outcomes, and it has a rubric to assess the quality of program learning outcomes. At the same time, it does not have a quantifiable or prescriptive approach. It offers rubrics designed for evaluating several assessment strategies, including capstones and portfolios, but it does not endorse particular strategies, even when it considers them good practice. ACSCU does hope that if institutions employ these strategies, the rubrics will be used by institutions as tools to assess them. ACSCU asserts that “some kind of culminating assessment of student learning and programs is expected, and capstones and portfolios are common ways to do it. There's huge variability and that's fine, but there are also principles on how to do that well, so that it features assessment” (personal communication, July 17, 2009).

The rubrics in many ways spell out what institutions should be doing for assessment with statements such as “assessment plans should be developed by faculty, multiple tools should be used, formative and summative strategies should be used, multiple assessment measures beyond GPA, and incorporate direct and indirect measures” (personal communication, July 17, 2009). Institutions would, of course, be able to use the rubrics to evaluate their “capstones and portfolios” but not the use of licensing exams, student exit surveys or 5 year out surveys of what they are doing with their life for which no rubrics are available (personal communications, July 17, 2009).

The Commission does not require standardized testing, but it does not “disallow it either” (personal communication, July 17, 2009). ACSCU follows the line of thinking that

it is fine if you want to use, for instance, an ETS field test. See what you can find out about your graduating majors through this test, but recognize the shortcomings of tests like that. If your institution has an institutional wide commitment to civil engagement or good communication skills or skill for working with diverse teams, this test is not going to tell you about that. So, use it, but think about what other assessment tools you need to assess the other goals that you think are important, and ones that characterize your program from others.

Based on these statements from ACSCU, it can be deduced that institutional goals should direct institutional assessment activities.

The standards do require a clear definition of learning outcomes. As demonstrated by this statement, “Educational objectives are clearly recognized throughout the institution and are consistent with stated purposes” and that evidence of success in achieving objectives at the “institutional, program, and course levels” should be apparent (p. 1, 1 Criterion 1.2).

Furthermore, every degree that an institution grants should have “clearly defined . . . levels of student achievement necessary for graduation that represent more than simply an accumulation

of courses or credits” (p. 13, Criterion 2.2). According to Criterion 2.3, the expected outcomes for a student’s course of study should be:

clearly stated at the course, program and, as appropriate, institutional level. These outcomes and expectations are reflected in academic programs and policies, curriculum, advisement, library and information resources, and the wider learning environment. (p. 15).

Moreover, ACSCU roughly outlines the levels of learning in a way that goes beyond requiring clearly defined outcomes to endorsing and privileging outcomes that evince

core learning abilities and competencies including, but not limited to, college-level written and oral communication, college-level quantitative skills, information literacy, and the habit of critical analysis of data and argument. In addition, baccalaureate programs actively foster an understanding of diversity, civic responsibility, the ability to work with others, and the capability to engage in lifelong learning. Baccalaureate programs also ensure breadth for all students in the areas of cultural and aesthetic, social and political, as well as scientific and technical knowledge expected of educated persons in this society. (p. 14)

Moreover, academic experiences should be challenging and rigorous regardless of outcomes (p. 15, Criterion 2.5).

While the Standards indicate that institutions assess course, program and institutional levels, ACSCU is “more interested in program and institutional levels” (personal communication, July 17, 2009). At the program level, specific program outcomes are the key factor. At the institutional level, general education and citizenship, as related to faith traditions, intellectual traditions, or social justice are stressed. ACSCU wants the institutions to attend to these higher levels rather than get “bogged down in individual courses, where a lot of the good effort has gone on anyway and where the testing and assessment has gone on anyway” (personal communication, July 17, 2009). Courses are only talked about when mapping the program or general education outcomes, largely to ensure that institutions are “clear where the outcomes are in the program, and where they are played out in their curriculum” (personal communication,

July 17, 2009). The ACSCU representatives say, “To get everyone to think about higher levels of aggregation has been an interesting and fruitful practice. It has encouraged a lot of interesting faculty dialogue. It becomes intrinsically rewarding” (personal communication, July 17, 2009).

ACSCU expects outcomes to be thoroughly assessed. Criterion 1.2 obliges the institution to measure student achievement in student learning outcomes; Criterion 2.6 to show that its graduates achieve state levels of attainment; and Criterion 2.7, to ensure that all programs are subject to program review that analyzes learning objectives and outcomes. In addition, the Commission suggests that an institution not only collect data on student learning but analyze it using

demographic categories and areas of study. It [the institution] tracks achievement, satisfaction, and campus climate to support student success. The institution regularly identifies the characteristics of its students and assesses their preparation, needs, and experiences. (p. 16, Criterion 2.10)

Besides this type of analysis, an institution is supposed to analyze its co-curriculum, according to Criterion 2.11 (p. 16).

The assessment process should be yield “appropriately defined and analyzed quantitative and qualitative data, and include consideration of evidence of educational effectiveness, including student learning” (p. 21, Criterion 4.3). There is no mention in the standards of using particular methods of assessment. While ACSCU does not prescribe methods, they “do require direct evidence, and [caution] that indirect evidence alone is helpful, but won’t carry the day. One needs to begin with the direct evidence and then support it with data from surveys and focus groups” (personal correspondence, July 17, 2009). A ACSCU representative elaborated, saying that some institutions rely too heavily on surveys, which do not tell the whole story; institutions now better understand that indirect measures should “complement the direct assessment” (personal communication, July 17, 2009).

Throughout, the standards mention faculty involvement in defining and assessing student learning outcomes assessment, perhaps most notably in 2.4 and in 4.6, respectively

The institution's expectations for learning and student attainment are developed and widely shared among its members, including faculty, students, staff, and where appropriate, external stakeholders. The institution's faculty takes collective responsibility for establishing, reviewing, fostering, and demonstrating the attainment of these expectations. (p. 15)

Leadership at all levels is committed to improvement based on the results of the inquiry, evaluation and assessment that is used throughout the institution. The faculty takes responsibility for evaluating the effectiveness of the teaching and learning process and uses the results for improvement . . . (p. 22).

The faculty should have "significant" involvement with the "inquiry into the processes of teaching and learning, as well as the conditions and practices that promote the kinds and levels of learning intended by the institution" (Criterion 4.7, p. 22). The Commission offers this statement as a guideline: "Where appropriate, the institution includes in its policies for faculty promotion and tenure the recognition of scholarship related to teaching, learning, assessment, and co-curricular learning" (p. 15). Although ACSCU provides a guideline for faculty scholarship on teaching and learning, "the guidelines are not mandatory, but are considered good practice" (personal communication, July 2009). When asked about campus success in engaging faculty, ACSCU states that successful campuses

don't talk about accountability and ACSCU as an assessment driver. The real reason to do assessment is that it helps students to learn and it strengthens your program. It supports your discipline that you love and dedicated your life to. That makes more sense, but many administrators do not approach it that way. (personal communication, July 17, 2009)

ACSCU representatives clarify that it is not uncommon is for lack of faculty involvement to be the subject of a team recommendation, but more commonly, the institution is encouraged to offer additional support faculty for doing assessment. ACSCU's standpoint is that there needs to be a reward system process in place for faculty doing assessment. In other words, "it needs to be

built into job descriptions and not just added to them” (personal communication, July 17, 2009). Many times, faculty fear that the assessment will be used against them, which is not, according to ACSCU, its intention. In fact, by focusing on program instead of course level assessment, ACSCU consciously tries to counter that fear.

All members of an institution are required to be involved with the accreditation process. The Commission states that “Appropriate stakeholders, including alumni, employers, practitioners, and others defined by the institution, are regularly involved in the assessment of educational programs” (p. 22, Criterion 4.8). While this list does not include governing boards, that body would nonetheless constitute an appropriate stakeholder. According to ACSCU, “boards need to understand and support the assessment enterprise and whether institutions are meeting the institutional level outcomes” (personal communication, July 2009). ACSCU notices that if student learning outcomes assessment is important for the top leadership, the board will know about it.

A group of appropriate stakeholders not listed in the Standards is the students. However, ACSCU representatives say that “students have to be involved in this process. Institutions are not realizing the full potential of this process, if they don’t have students actively involved” (personal communication, July 17, 2009). ACSCU recommends that “students be involved in every stage of the process, from defining outcomes or figuring out the methodology to sitting in on the discussion of what the results mean, and sharing their suggestions in what can be improved. They have a role in every stage of the process” (personal communication, July 17, 2009).

The Standards—4.4, in particular—suggest that assessment findings should be built into the institution’s quality assurance processes at nearly every level and that they should be used for

improvement: “These processes include assessing effectiveness, tracking results over time, using comparative data from external sources, and improving structures, processes, curricula, and pedagogy” (p. 22). A guideline in Standard 4 states that procedures for student learning outcomes assessment should “lead to a culture of evidence and improvement” (p. 22). In addition to improving student learning, assessment processes should reflect on the assessment process itself in so much as the institution reviews “the design of curricula, the design and practice of pedagogy, and to the improvement of evaluation means and methodology” (p. 22). The institution is supposed to ensure that it has the research capacity for such analysis and research, per Criterion 4.5. In fact, the institution should support and sustain student learning as the very means of providing an effective academic program (p. 19, Criterion 3.8).

The Commission does expect public disclosure of information. Criterion 2.6 indicates that the institution must “demonstrate” the achievement of its graduates (p. 15) and criterion 1.2 stipulates that the institution “makes public data on student achievement at the institutional and degree level, in a manner determined by the institution” (p. 11). In October 2008, an ACSCU task force on Transparency and Accountability was appointed. Its first report was issued in October 2009. This task force was created exclusively to provide additional guidance on Standard 1.2. Its report explains the importance of providing “current and easily accessible data about student achievement” to various higher education stakeholders (ACSCU, 2009, p. 5). To that end, the task force provides recommendations what kinds of information institutions might publish and where it might appear. One recommendation is that institutions “provide links to summary explanations of their approach and to recent representative data” (p. 13). Types of “representative data” are listed in the report, with a clear indication that the kinds of data identified in the report are not mandatory but recommended. The Task Force also produced

rubrics that institutions may use to track their progress with regard to the transparency aspects of Criterion 1.2.

The main section addressed in the task force report is the recent change to the Criterion for Review 1.2, which was the addition in June 2008 of a clause requiring institutions not only to have clear educational objectives but also to publish information about how the objectives are being met. The staff said, “ACSCU is requiring some degree of disclosure, but what or how the institutions disclose is not mandated” (personal communication, July 17, 2009). ACSCU not implement this change until Fall 2009 to give institutions adequate time to decide what data to publish, where and how.

Student Learning Outcomes Assessment Resources. ACSCU shares information on student learning with its members through its web page (www.wascsenior.org), including information on assessment workshops, presentations on student learning outcomes assessment by staff, and rubrics related to assessment and educational effectiveness. Additionally, the website features a discussion forum and an on-line library that includes some materials concerning student learning outcomes assessment.

One of the ways ACSCU helps institutions to understand the standards in a concrete and clear way, according to its staff, is through educational activities. ACSCU representatives said of these activities: “You can’t demand student learning outcomes assessment if you are not helping institutions to get there, and the resources in the region to build capacity for doing assessment work were just not there” (personal correspondence, July 2009). Besides the resources available on-line, there are two levels of retreats on student learning and assessment (Level I and Level II), each offered once or twice a year. The retreats operate as two-day workshops, facilitated by Mary Allen and Amy Driscoll, for all levels of colleges and universities accredited by ACSCU

ACSCU and ACCJC. The Level I workshop provides information on assessing general education, the major, and the co-curriculum as well as information on how to analyze the data and use it for improvement of the curriculum and pedagogy. The Level II workshop provides a more in-depth look at student learning outcomes assessment, including topics such as supporting a culture of evidence, engaging more faculty and staff, and assuring quality. Both workshops recommend that a two- to three-person “assessment team” from each participating campus attend.

Also new to ACSCU is the Assessment Leadership Academy. It seeks to train the trainers, so that their leadership will impact their campuses, the region and even the nation. ACSCU will start its first Academy class in 2010 with 30 people. Each year the ACSCU holds an *Academic Resource Conference*, commonly called the ARC, at which information on student learning outcomes assessment and other topics is presented, thus giving institutions a chance to learn from one another. The staff member who organizes this meeting is an expert in student learning outcomes assessment. ACSCU learned from its members that their favorite part of the ARC is having a chance to network with others from the region with regard to student learning outcomes. As a result, ACSCU has sought to opening up the ARC and assessment workshops to as many institutions as possible. One way it is facilitating this interaction is through the Assessment II workshop, for which “institutions have to prepare two successful practices that they can share in a poster session with other teams that will be there, so they can make connections and offer mutual guidance and support” (personal communication, July 17, 2009). These workshops “do not focus on ACSCU expectations, but on good assessment practices” (personal communication, July 17, 2009). Many institutions “need this experience to build

assessment on their campus” (personal communication, July 17, 2009). ACSCU allows “good practice” institutions to serve as models but notes that no institution’s practices are perfect.

In much the same fashion, evaluators are educated concerning the evaluation process and the various ways to examine a program. A full-day in-person training for evaluators is provided twice a year and supplemented with webinars. A task force report on Program Review is available on-line and evaluators are trained to examine program reviews and the results of assessment that are used in program reviews. Evaluators are asked to use rubrics for assessing the institutional assessment practices during the campus visit. These rubrics are readily available on-line for anyone to see at the ACSCU Document Library and at the Evaluator Training link. The rubrics list key elements of the standards alongside descriptive columns defining stages of institutional development, including the initial stage, the emerging stage, the developed stage, and the highly developed stage. For instance, on the *Educational Effectiveness Framework: Capacity and Effectiveness as They Relate to Student and Institutional Learning* rubric, an element and definition reads: “Student learning outcomes established; communicated in syllabi and publications; cited and used by faculty, student affairs, advisors, others (CFRs 2.2, 2.4)” (ACSCU, n.d.). For this item, under initial stage an institution may have only a few programs listing their student learning outcomes, and there is minimal knowledge or use of them across the campus; in the emerging stage, many programs list this information in basic documents, which are beginning to be used; in the developed stage, all programs have established outcomes, and they are known and used by most programs; in the highly developed stage, all programs share such information, and faculty and others use it widely and routinely. Similar rubrics following this structure are available for evaluating the quality of program learning outcomes, the use of

portfolios and capstones, the use of assessment in program reviews, and assessment of general education.

Peer Review. The ACSCU region has 3000 to 4000 peer reviewers. The staff matches institutions with reviewers from like institutions; however, the whole team is generally not from a like institution and represents the region more broadly. Often, ACSCU representatives explain, “we will try to build the team with people who have expertise in areas that the institution is studying or trying to improve” (personal communication, July 17, 2009). The teams consist of faculty, administrators, and librarians with relevant expertise. Typically, ACSCU tries to appoint a team chair from a comparable institution or an institution of slightly higher prestige. Many chairs serve as chairs on a regular basis. ACSCU sends many of the same team members for both visits, but it often replaces the resource expert from the capacity visit with an assessment expert for the educational effectiveness visit. An assessment expert is defined as a reviewer “who has led a successful assessment on his or her own campus,” or a highly regarded assessment figure (personal communication, July 17, 2009). An ACSCU staff member goes along with the team conducting the visit to serve as a resource for the first day and a half of the two-and-a-half-day visit. The team submits a detailed report and makes a confidential recommendation to the Commission, but the final decision belongs to the Commission.

Accreditation Actions. ACSCU asserts that workshops have built capacity in the region and have made expectations clear, “so that it is no longer acceptable for an institution to fall in the initial stages of the Educational Effectiveness framework. If they are not on the ‘developed stage,’ the Commission is more comfortable giving them a shorter term of accreditation or asking for follow-up steps to be taken” (personal communication, July 17, 2009). If ACSCU wants the institution to report back, it can ask for a Special Visit or an Interim Report. The

Commission can also impose one of the following: 1) a formal notice of concern; 2) a warning; 3) probation; 4) a show cause; or 5) termination. While the first of these actions indicates that the institution is “trending toward non-compliance,” this action is not public, as are the rest. The following are illustrative quotations pulled from an accreditation letter:

The campus achieved a strong consensus about “student learning as a comprehensive, holistic, transformative activity that integrates academic learning and student development.” . . . Although much work has been done to build the capacity for assessment at XXX, progress has been uneven across campus, and efforts have not been sustained over time. Various mechanisms for promoting and overseeing assessment of student learning are in place but are not adequately supported with resources. There is no central entity or unit that is responsible for moving the assessment program forward. The University should create an effective structure and process for oversight of assessment activities, communication of assessment good practices, and sharing and use of assessment results. Assessment activities should be adequately supported. More strategic and effective steps should be taken to build the interest and expertise of the faculty to engage in assessment of student learning. Assessment of student learning should be comprehensive and conducted in all programs . . . special attention should be given to methods of assessing general education outcomes across disciplines at the undergraduate level. . . The results of assessment should inform planning and budgeting decisions. . . . Substantial progress in addressing these issues will need to be made by the time of the Educational Effectiveness Review in order for the University to demonstrate its core commitment to Educational Effectiveness (Criteria for Review (CFRs) 2.3-2.7, 4.4, and 4.7). (ACSCU, confidential letter, 2007).

This institution was allowed 18 months before the next visit in order to address the Commission’s concerns. After the Educational Effectiveness review, the institution received a letter explaining that they had made “tremendous strides” with their “assessment of student learning” (ACSCU, confidential letter, 2009). The letter continues by noting that the institution is implementing a successful program review process but still needs to give further attention to “clarifying general education and baccalaureate learning goals” before engaging in assessment of those goals. The commission states that the

infrastructure for conducting assessment and reporting results has been established. Now, processes should be aligned for efficiency and clarity, and the emphasis should move from setting up good processes to analyzing and using the results (Criteria for Review (CFRs) 2.3-2.7, 4.4, and 4.7). (ACSCU, confidential letter, 2009).

As a result, the institution had its accreditation reaffirmed, and the next review was scheduled for 2017. That means that the institution will need to start the formal process in 2015 by submitting a proposal. It was asked to submit an Interim Report in 2012 to address among other things, “progress on assessment of student learning and program review.”

This letter is typical of what other institutions receive. ACSCU representatives assert that “if an institution got ten years, then we are confident they will keep going” (personal communication, July 17, 2009). It is important to note that in the last two years, only one institution has been offered ten years. However, even when ACSCU gives a ten year accreditation cycle, its representatives state they are “unsure about the sustainability of assessment, so, as a matter of course, [they] ask for a mid-term report” (personal communication, July 17, 2009). Staff members noticed that strategies for keeping the momentum going after an accreditation visit became a theme at ARC, and they assert that “If ACSCU comes back and the institution dropped the ball, ACSCU hits them pretty hard. They may get a shorter cycle between visits” (personal communication, July 17, 2009). ACSCU requires as part of the Educational Effectiveness visit results an essay detailing how the institution plans to sustain its assessment practices after the Commission leaves.

For the last five years of decisions, continued work on assessment has been the subject of a recommendation in almost every action letter to every institution. Recommendations ranged from insufficient faculty involvement to too little evidence of a plan to sustain assessment. At this point, institutions with inadequate assessment

have not gotten a warning based on this alone, but they have gotten a formal notice of concern. This means shorter terms of reaccreditation and more prescriptive action letters. No institution with weak assessment in the last couple of years has gotten any more than seven or eight years even if everything else is perfect. And we have gotten more rigorous since 2001.

ACSCU staff intimated that the “bottom line is that no one has ever been sanctioned for student learning outcomes alone; there have been interim reports, special visits, and shorter terms of accreditation” (personal communication, July 17, 2009). Representatives added:

We are not sure that we had any institution that came before us that should have gotten a sanction like probation. If an institution is going to get a sanction, they usually have an array of problems across the spectrum. Sometimes in the institutions that are getting sanctioned, they still have strong assessment. This would typically be true at small institutions where faculty work closely with administrators. A lot of the times, faculty keep going along doing good work, while other parts of the institution are in turmoil.

ACSCU is analyzing teams’ findings on the Educational Effectiveness Framework to find out where institutions fall overall and how teams are using the framework. Its view is that consistency is crucial to the process.

ACSCU representatives say that at first, when the Standards for learning outcomes assessment were new, the Commission did not handle the shortcomings in a “punitive way but the Commission’s recommendations promoted improvement as a matter of developmental growth” (personal communication, July 17, 2009). Now, ACSCU states that the Standards are more concrete and the institutions are more familiar with them, so more institutions are being asked for follow up if they are not at the “developed” stage (personal communication, July 17, 2009). As much as ACSCU “does not want to utilize a checklist or mandate a particular way of doing assessment,” the Commission needs to be able to sanction an institution that is not meeting expectations about assessment (personal communication, July 17, 2009). Having clearer expectations allows ACSCU “to be more comfortable about being more directive when needed in an action letter” (personal communication, July 17, 2009).

Summary. ACSCU is unique by the fact that it only accredits institutions that offer at least a baccalaureate degree. This particular region is heavily dominated by California, which

means that many of the California state policies can be influential. In 1996, it made a turn towards looking at learning outcomes assessment, but the requirements did not enter the Standards until 2003. The Commission makes strong statements about the student learning outcomes needing to be defined and assessed, especially at the program level, although institution and course level are required as well. The requirement on faculty is also very direct, and the Commission provides a guideline on how to achieve more faculty involvement. Student involvement, though not a part of the Standards, is considered by ACSCU representatives as instrumental to the process of assessment. This Commission provides many opportunities for training institutions to do learning outcomes assessment. A Standard relates to public disclosure of information, and a Task Force recently submitted a report to assist institutions to address this Standard. ACSCU is providing more follow-ups for student learning outcomes assessment now, than they were in even the last two years.

Chapter Five

Presentation of the Findings

The purpose of this case study is to examine the intersection of collegiate-level student learning outcomes assessment with regional accreditation to find out what perceived influence accreditors are having on institutions. To that end, the Standards of each of the regional accreditation agencies were carefully reviewed and representatives from the regional accreditation agencies (with the exception of NWCCU) were interviewed. In addition, data was gathered from a Council for Regional Accreditation Commissions (C-RAC) and National Institute for Learning Outcomes Assessment (NILOA) Symposium on student learning outcomes assessment, a daylong event in October 2009. While chapter four maps the policies and practices of each region, this chapter synthesizes the information from the previous chapter to compare and contrast the regional accreditation agencies. Furthermore, contextual information is provided, and six key findings are presented and discussed.

Despite having separate standards and policies, all of the regional accreditors belong to C-RAC, an organization created in 1996 to allow accreditors to share information, to create policies, and to communicate with “Congress, higher education, other organizations, and the public” (MSCHE, 2009, p. 12). During the interviews, every region discussed the value and importance of the *Principles for Good Practices: Regional Accrediting Commissions* (2003). The purpose of the principles is to “help guide the work of all regional commissions” by showing “the commissions’ shared commitment to student learning,” and by providing “a basis for assessing accreditation practice across the regions” (p. 1-2). Nationally, assessment can be thought of as a field structured by the *Principles for Good Practices*. These “transposable dispositions,” as Bourdieu would call them, have been to some degree or another adopted by

each of the regional commissions. Moreover, the broader logic of accreditation practice is the result of regions sharing and discussing strategies with other institutions. The *Principles* state what the accreditors should do and what they should expect the institutions to do.

Essentially, the *Principles* act as a list of expectations for the accrediting commissions. Each region should: 1) expect learning outcomes that are directly related to institutional missions; 2) look for clear, suitable evidence; and 3) build capacity through training. My mapping of the policies and practices of the regional accrediting agencies suggests that they are adhering to the basic principles of this national “agreement.” Most have changed their accreditation standards since the agreement or have strengthened them in regard to student learning outcomes expectations.

The accrediting commissions, according to the *Principles*, should expect the institutions: 1) to value educational quality and to evaluate how well they meet their stated goals in their learning missions; 2) to document that the learning is appropriate for the degree awarded by listing clear learning goals, collecting evidence, evaluating the evidence, and using the evidence as the basis for institutional improvement; and 3) to collect evidence through a number of sources. In addition, the assessment activities should involve many stakeholders, so that everyone “with a stake in decisions of educational quality participate in the process” (p. 3).

The six main findings of this study will shed light on the possible nature of this impact that regional accreditation agencies are having on institutions:

Finding One: All regional accreditors expect learning outcomes to be defined, assessed, and used for institutional improvement.

Finding Two: None of the regional accreditors prescribe assessment practices, but NEASC, NCA-HLC, SACS, and ACSCU are providing structured guidance.

Finding Three: All accreditors appear to agree that public disclosure of learning outcomes assessment information is an issue of institutional integrity, and

NWCCU's 2010 Standards contains the strongest statement on publicizing student learning outcomes assessment results.

Finding Four: The regional accreditors' Standards, with the exception of SACSCOC, directly address expectations for faculty to contribute to learning outcomes assessment, particularly with respect to the creation of learning goals and of plans linking assessment to improvement; SACSCOC implies this involvement in its Standards

Finding Five: Regional accreditors are citing deficiencies in student learning outcomes assessment with increasing frequency.

Finding Six: Regional accreditors provide institutions with student learning outcomes assessment resources, with the exception of NWCCU.

While these main findings will be elaborated individually below, it is first necessary to provide an overall reflection on their relationship to the literature on assessment and, more specifically, to the *Principles*. According to the literature, successful assessment practices include these themes: clarity, methods, use, analysis, and training (Banta, 1993; Banta, Jones, & Black, 2009; Boud, 1995; Suskie, 2004; Walvoord, 2004; Richardson, 1994). Each of these themes is evident in the *Principles* and in the regional accreditors' expectations that promote clearly stating outcomes, employing a variety of assessment methods, using the results to make institutional improvements, involving faculty in the institutional assessment throughout the assessment process, and training the people involved with campus assessment. In addition, the accreditation agencies are making efforts to provide expertise and training. In some cases, peers are experts in assessment, so they can bring that expertise to the institution. In other cases, peers do not have direct experience with assessment but will likely have some knowledge based on what is happening at their home institution and what is learned during the team training. All of the peers are provided with training, which in some cases is not mandatory. In addition, institutions may attend training programs with the accreditors.

Findings

One: All regional accreditors expect learning outcomes to be defined, assessed, and used for institutional improvement.

While ten years ago institutions in most regions were expected to have defined learning outcomes and to have an assessment plan, they are now expected to assess these goals and use the information for institutional improvement. Each region updated its accreditation standards in the last eight years, and these updates include stronger statements on student learning outcomes assessment. Given that most institutions are on a ten-year cycle, institutions will have completed the expectations set forth in the new standards between 2012 and 2018. This is true even for ACCJC, which operates on a six-year cycle, but is allowing institutions ten years to become compliant with assessment expectations set in 2002.

Some regional accreditors have single standards directly related to assessment, while others have recently embedded assessment throughout their standards. MSCHE (Standard 14) and NCA-HLC (Criterion 3) have standards dedicated to learning outcomes assessment. NEASC (Standard 4.44-4.50) and Northwest (2003-Standard 2.B and 2010 Standards 2.C and 4.A.3) have student learning outcomes assessment requirements as a part of broader standards on academics. SACSCOC (Core requirement 2.12 and Standards 3.3.1 and 3.51) has spread the requirements for student learning outcomes assessment over two standards. While ACCJC (Standard II) and ACSCU (Standard II) each have a standard that directly relates to student learning outcomes assessment, they each have three other standards that include some requirements for student learning outcomes assessment. ACSCU has created a new set of standards in 2008 with a greater focus on student learning outcomes assessment, which includes a three stage process that integrates student learning outcomes assessment information throughout all the stages.

Almost all of the accreditors expect for institutions to **articulate** learning outcomes. MSCHE, NCA-HLC, and ACSCU all say that the student learning outcomes should be clearly stated. For example, MSCHE expects clearly stated learning outcomes in the Standards, and in its fundamental elements it indicates that institutions should have “clearly articulated written statements, expressed in observable terms, of key learning outcomes” (MSCHE, 2002, p. 64). NCA-HLC expects institutions to “clearly” state student learning outcomes “for each educational program” (NCA-HLC, 2003, p. 3.1-4). ACSCU expects for institutions to define their learning outcomes; specifically, “Educational objectives are clearly recognized throughout the institution and are consistent with stated purposes” (2008, p. 11, Criteria 1.2). SACSCOC requirement states that institutions need to “identify college-level general education competencies” (2007, p. 27, Standard 3.51). ACCJC, like SACSCOC, requires for institutions to identify student learning outcomes (2009, p. 17, Standard II.A.1.c), and supplies a definition of student learning outcomes as the “knowledge, skills, abilities, and attitudes” that students will gain by participating in a program (2002, p.29). NEASC and NWCCU both expect the outcomes to be published as evidenced by NEASC’s Standard that says an institution “publishes the learning goals and requirements for each program” (NEASC, 2005, p. 7) and NWCCU’s requirement that the institution “identifies and publishes the expected learning outcomes for each of its degree and certificate programs” (2003, p. 7).

While all specify that course, program, and institutional learning outcomes should be evaluated, some accreditors, including NEASC and NCA-HLC, focus more on program-level goals. SACSCOC and ACSCU point out that course-level assessment is not a focus of the accreditation process. For instance, SACSCOC states that all educational programs should have listed student learning outcomes but does not require institutions to provide course-level

information (personal communication, July 10, 2009). In addition, ACSCU notes that outcomes should be “clearly stated at the course, program and, as appropriate, institutional level” (p. 15, Criterion 2.3). Even so, the ACSCU staff say that they are “more interested in program- and institutional-level goals” than course-level goals because good work is already occurring at the course level and that course-level assessment is received indirectly through activities such as course mapping (personal communication, July 17, 2009). All the regional accreditation agencies focus on program-level information even when their standards also list course- and institutional-level information. At the C-RAC/NILOA Symposium, Trudy Banta said that “assessment for improvement really takes place at the unit, program, or department level because that’s where students and faculty meet and where learning occurs.” In some ways, this outlook appears to be mirrored by the accreditors.

All of the accreditors expect for institutions to **assess** their stated learning outcomes. While all of the agencies require assessment, some underscore that it should ensure learning and, in so doing, equate this goal with institutional effectiveness, even though their relationship could be seen as complimentary or hand-in-hand. NEASC stands out because of the way it tries to understand how students learn. For instance, NEASC’s Standard states “Evaluation enables the institution to demonstrate through verifiable means its attainment of purposes and objectives both inside and outside the classroom” (2005, p. 4). A different Standard adds that an institution should implement a “systematic and broad-based approach to the assessment of student learning” that drives to understand both what and how students learn (p. 12, Standard 4.4). MSCHE also highlights learning in its standards, calling for institutional use of assessment that “demonstrates that, at graduation or other appropriate points, the institution’s students have knowledge, skills, and competencies consistent with institutional and appropriate higher education goals” (MSCHE,

2006, p. 63). To this end, the institutions must assess the “key learning outcomes” (2002, p. 63). SACSCOC, too, requires for institutions to state the competency levels for students and to identify “the extent to which graduates have attained them” (2007, p. 27, Standard 3.51). Like the others, ACCJC requires that “instructional programs are systematically assessed” and that “The institution engages in ongoing, systematic evaluation and integrated planning to assure currency and measure achievement of its stated learning outcomes” (2002, p. 6, Standard 2.A.2.f). NWCCU expects “broad-based, continuous planning and evaluation” (2003, p. 27). The measures for this evaluation should be “clearly defined,” “conducted on a regular basis,” and “integrated into the overall planning and evaluation plan” (p. 29). The new standards for NWCCU, approved in January 2010, place less emphasis on planning and more on the data that should be collected. The 2010 standards require “an effective, regular, and comprehensive system of assessment of student achievement” that proves that the learning outcomes have been achieved (p. 15). These standards will not go in effect until 2012.

ACSCU and NCA-HLC discuss learning and teaching effectiveness, but as a core function or for institutional effectiveness. At ACSCU, according to Standard II, the institutions need to “demonstrate that [the] core functions are performed effectively” (2008, p. 14). NCA-HLC also requires assessment, stating that the “organization’s ongoing evaluation and assessment processes provide reliable evidence of institutional effectiveness” (NCA-HLC, 2003, p. 3.1-3) and, in particular, by noting that assessments should provide “evidence of student learning and teaching effectiveness” (NCA-HLC, 2003, p. 3.1-4). At the C-RAC/NILOA Symposium, a representative from NCA-HLC mentioned that most of its information on student learning is actually in its supplemental information and not in its standards. For instance, as a result of “recentering” student learning outcomes assessment in 2004-2005, the NCA-HLC

created the Fundamental Questions, derived from the C-RAC *Principles*, which have allowed for institutions to get to “the deeper level of learning” by having institutions answer questions about their assessment efforts that focus on learning (personal communication, July 9, 2009).

The accreditors all expect institutions to use multiple measures to assess learning. MSCHE says that assessments must include direct and indirect evidence, and provides examples on the types of direct and indirect evidence that may be used. The *Fundamental Evidence* section, which provides context for the Standards, also explains the use of qualitative and quantitative data. Even if qualitative data is used, a MSCHE representative said, the data collection should be done systematically (personal communication, July 30, 2009). Like MSCHE, NCA-HLC also expects direct and indirect evidence. NEASC asserts that institutions need both qualitative and quantitative data on student learning, but according to NEASC staff both indirect and direct assessment measures should be used as well (Standard 4.50). At NWCCU, the expectation is for institutions to collect “quantitative and /or qualitative [data], as appropriate to its indicators of achievement” (2010, p. 15). A SACSCOC representative stated that institutions should use “multiple measures” but noted that this requirement is understood in the region, not listed in the standards (personal communication, July 10, 2009). ACCJC staff say that there should be a “range of strategies” used for evidence of student learning (personal communication, July 16, 2009). While the ACSCU standards themselves are open for interpretation on what is expected from institutions, the Commission provides rubrics on assessment and assessment strategies, such as capstones and portfolios. While the ACSCU staff says that the rubrics serve as just a guide for institutions using these common good practices for assessment, the rubrics provide “tools” to judge these activities (personal communication, July 17, 2009). Even so, its Standards request “appropriately defined and analyzed quantitative and

qualitative data” that points toward careful “consideration of evidence of educational effectiveness” (p. 21, Standard 4.3). In the interviews, the accreditors all pointed out the importance of institutions using appropriate measures. For instance, an institution would not want to use an engagement survey to determine if the students have critical thinking skills. This specific example was used more than once, and variants of it were used by several of the accreditors.

Moreover, all the accreditors want institutions to **use** the information gained from the assessment process for improvement of the institution. MSCHE requires that the results of assessment be used to “improve teaching and learning” (2002, p. 63) and that the assessment process evaluates the institutional effectiveness. The entire process should be “useful,” meaning that assessment should be directly related to institutional goals. This accreditor stresses that the assessment process should be “ongoing” (2002, p. 63 and personal communication, July 30, 2009). Therefore, by assessing student learning, institutions are not only meeting the requirements of the accreditors but also improving the institution. NEASC states that the “results of evaluation are used systematically for improvement and to inform institutional planning, especially as it relates to student achievement and resource allocation” (2005, p. 4, Standard 2.6) and that the evidence from assessment should be used to “improve the academic program” (p. 7, Standard 4). A strong commitment to understanding how data is used is part of the NEASC culture. Representatives from that Commission say that their favorite question is, “What did you learn?” (personal communication, July 29, 2009). They expect that learning goes into institutional improvement as well as in improving the assessment process. NCA-HLC describes that assessment should be used to develop “strategies for continuous improvement” (NCA-HLC, 2003, p. 3.1-3) and that the results of assessment “inform improvements in curriculum,

pedagogy, instructional resources, and student services” (NCA-HLC, 2003, p. 3.1-4, Core Component 3c). NCA-HLC emphasizes that changes should improve learning. For instance, Lynn Priddy (2008) has stated in a presentation that assessment can be a way to “understand what learning is and is not occurring, clarify institutional and pedagogical goals and strategies, help everyone on campus understand their roles in producing learning, have ongoing conversations about learning, and improve continuously.” The Academic Quality Improvement Program (AQIP) expectations list that

Assessment can demonstrate to the public that the programs you offer, and the students you graduate, have achieved your educational goals. A truly effective college or university is never satisfied with its current levels of performance, but always strives to improve upon these, both by raising its expectations for student learning and by providing better programs to help students achieve that learning. (NCA-HLC, 2005, p. 4)

For NWCCU, assessment is used to help the institution fulfill its mission, to improve the educational process, and to meet accreditation requirements. Like the others, SACSCOC expects that the information is used to improve quality and prove that the institution is fulfilling its mission (2007, p. 16). Institutions need to analyze the evidence and use this information for improvement. In particular, the Quality Enhancement Program should “result in continuing improvement in institutional quality” (p. 16). The Institutional Effectiveness requirement stipulates that evidence be used for “improvement based on analysis of the results” (SACSCOC, 2007, p. 25). ACCJC, too, asserts that institutions use the information gathered from student learning outcomes assessment activities for improvement, as evidenced by its Standards that say “use results to make improvements” (2009, p. 5, Standard II, 1.c), while another states “Instructional programs are systematically assessed in order to assure currency, improve teaching and learning strategies, and achieve stated student learning outcomes” (p. 5, Standard II, A.). As with the other commissions, ACSCU expects that the assessment of learning outcomes is linked

with educational effectiveness. Keeping to the purpose of accreditation for quality improvement, all the accreditors expect that institutions actively use assessment data to improve educational programs and, ultimately, the institution at large.

While all the accreditors expect that institutions state learning outcomes, assess them, and use the results for improvement, one important factor must be taken into consideration: the dates of the standards and the typical ten-year cycle would mean that not all institutions have been expected to meet these requirements. To provide context to that fact, two national surveys asked provosts if they had a common set of learning outcomes that apply to all students. The NILOA survey of all undergraduate degree granting, regionally accredited institutions found that near 80% of institutions have a common set of learning outcomes (Kuh & Ikenberry, 2009, p.8). This finding echoes the American Association of Colleges and Universities (AAC&U) survey of its member institutions that say that 78% have a common set of learning outcomes (Hart & Associates, 2009, p. 3). During a C-RAC and NILOA symposium on learning outcomes assessment and accreditation, representatives from the regional associations said that the institutional-level numbers from NILOA seemed higher than they would expect, given that most do not require common institutional-level but program-level learning outcomes. Interestingly the AAC&U survey did ask about department-level outcomes, and 65% of its members say that all of their departments have specified field-specific learning outcomes (p. 3). Granted, the provosts surveyed were only AAC&U institutions, but even so, the number for the department-level outcomes demonstrates that less may be happening at the program level than one would expect given the expectations of accreditors.

A common sentiment at the C-RAC/NILOA Symposium was that while accreditors have taken on the charge of student learning outcomes assessment and are seen as the driving force by

many colleges, it would be preferable if student learning outcomes assessment was part of the culture of the institution. As such, there would be a desire for quality improvement that was not directly tied to accountability. As discussed in previous chapters, a constant theme in discussions of assessment has been whether it is done for accountability or for improvement (e.g. Banta, 1993; Ewell, 2009). Accreditors try to bridge the divide by focusing on improvement, but at the heart of accreditation is quality assurance/accountability, namely because the accreditors serve as gatekeepers for federal funding.

Two: None of the regional accreditors prescribe assessment practices, but NEASC, NCA-HLC, SACS, and ACSCU are providing structured guidance.

The regions are all very careful not to define exact methods of assessing outcomes, especially given the diversity of institutions that they accredit. They do, however, expect that institutions will define their learning outcomes based on their own missions and goals. As previously noted, they also expect direct and indirect evidence as well as qualitative and quantitative information. While none of the accreditors states an intention to prescribe a particular method, each indicates in interviews that each institution should select the process that works best for it while at the same time offering a spectrum of evidence. Moreover, the regional accrediting agencies all appear to link assessment with a support system, so that the institution provides the resources to sustain the assessment processes. It is often suggested that institutions should embed the assessment process into activities that are already taking place on campus, most notably by MSCHE, NEASC, and ACSCU. The degree of commitment to assessment as a process that garners useful results, according to a NCA-HLC staff member, allows for institutions to approach assessment in different ways, but one element of consistency is essential: “persistent engagement and leadership for assessment” (personal communication, July 10, 2009). A SACSCOC staff member offered a similar observation, saying that “Institutions must have

assessment embedded in their institutions and have a good commitment to use assessment results” (personal communication, July 10, 2009). These statements are not unlike one that recurs in MSCHE presentations, the one emphasizing that “something should be happening everywhere, every year” in regard to assessment. Yet, how the institution assesses is not of particular concern (Suskie, 2009, ppt. sld. 27). While MSCHE, ACCJC, and NWCCU expect institutions to include assessment information as part of a larger self-study, NEASC, NCA-HLC, SACSCOC, and ACSCU guide how institutions respond to the learning outcomes assessment requirements in different ways.

NEASC has instituted the Making Assessment More Explicit (E-series) and Data Forms on Student Success (S-series), commonly called the E and S forms. These forms, developed in August 2008, became a requirement in Spring 2009. The Policy Statement on Student Achievement and Success advances an initiative with two parts: first, Making Assessment More Explicit (E-series) and, second, Documenting Student Success (S-series). The E-series requests that institutions “select and declare their basic approach to assessment and to summarize their findings” (NEASC, 2008, p. 1). The Commission lists four possible alternatives, and although institutions may create other alternatives, they must contact the Commission for approval. These Commission’s alternatives are

1. An inventory of program assessment and specialized accreditation
2. The Voluntary System of Accountability (VSA) plus program review
3. Statement of claims for student achievement with supporting evidence
4. Comparison to peers on measures of student achievement and success (p. 1).

For the S-series, institutions provide their data on retention and graduation rates as well as other measures that fit with the institutions’ missions. As a means of assistance, institutions

are given forms for documenting this information, which are filled out during the fifth-year report and the ten-year comprehensive review. The initiative is meant to be “mission-sensitive,” that is, the types of information collected would allow a diverse set of institutions to demonstrate success. The Commission hopes that the initiative will promote creativity as well as institutional improvement (NEASC, 2009a, p. 10). NEASC is trying to provide some flexibility while also offering a clear structure.

NCA-HLC has two programs that guide accreditation as it relates to student learning outcomes assessment. First, AQIP serves as an alternative to the self-study process and aims to improve institutional quality through the initiation of a continuous cycle. AQIP institutions are “part of an intensive, collaborative effort to reshape their cultures and to make a commitment to continuous quality improvement their constant focus” (NCA-HLC, 2008, p.244). Assessment is a key function of the AQIP process. The AQIP institutions must “measure student learning—and use the results to improve teaching and learning processes as well as all other institutional processes that contribute to student learning” (NCA-HLC, 2008, p.244). In the *Helping Students Learn* AQIP category, an institution must “address specific questions about its teaching-learning processes, about the performance of these processes, and the way the institution uses results data to improve” (NCA-HLC, 2008, p.244). Participating institutions create at least three Action Projects focusing on institutional improvement, one of which addresses student learning assessment. These are reviewed annually.

The second NCA-HLC program that can be used to fulfill accreditation standards, but does not replace the self-study process, for student learning outcomes assessment is The Academy for Assessment of Student Learning, which started in November 2006. This program includes a “four-year sequence of events and interactions focused on student learning, targeted at

accelerating and advancing efforts to assess and improve student learning, and designed to build institution-wide commitment to assessment of student learning” (NCA-HLC, 2008, p.251).

Institutions in the North Central region can participate in this Academy to fulfill accreditation requirements related to student learning, to avoid mandates related to insufficient student learning outcomes assessment information, or to implement one of the AQIP action projects (NCA-HLC, 2008, p.251). Institutions send teams to create an Action Portfolio, attend workshops, and receive feedback on their portfolios. In the end, institutions write a brief Results Report, and the Academy compiles the publications as a “showcase of accomplishments and inventory of good practices” (NCA-HLC, 2008, p.251).

In contrast to the optional NCA-HLC initiatives, the Quality Enhancement Plan (QEP) through SACSCOC is mandatory for each institution. A QEP must be submitted which

(1) includes a broad-based institutional process identifying key issues emerging from institutional assessment, (2) focuses on learning outcomes and/or the environment supporting student learning and accomplishing the mission of the institution, (3) demonstrates institutional capability for the initiation, implementation, and completion of the QEP, (4) includes broad-based involvement of institutional constituencies in the development and proposed implementation of the QEP, and (5) identifies goals and a plan to assess their achievement. The QEP should be focused and succinct (no more than seventy-five pages of narrative text and no more than twenty-five pages of supporting documentation or charts, graphs, and tables). (SACSCOC, 2007, pp.6 and 19)

These plans are then followed by a peer visit. This visit may include an assessment expert who consults with the institution concerning its QEP (personal communication, July 10, 2009).

Clearly, this directive focuses attention on student learning in a systematic way, and even though the process is not prescribed, the expectations with respect student learning outcomes assessment are clear.

Very similar to SACSCOC’s QEP is the new process for ACSCU that divides the visit into three parts. The first part is a proposal, the second a capacity visit, and the third the

educational effectiveness visit. Student learning outcomes assessment is threaded throughout the process. Institutions, as part of this process, are asked questions from an *Educational Effectiveness Framework: Capacity and Effectiveness as They Relate to Student and Institutional Learning* rubric. This rubric outlines the Standards and gives the peer reviewers a way to judge the institution. For example, an element and definition reads: “Student learning outcomes established; communicated in syllabi and publications; cited and used by faculty, student affairs, advisors, others (CFRs 2.2, 2.4)” (ACSCU, n.d.). If classified in the initial stage for this item, an institution may have only a few programs listing their student learning outcomes, and there is minimal knowledge or use of them across the campus; in the emerging stage, many programs list this information in basic documents, which are beginning to be used; in the developed stage, all programs have established outcomes, and they are known and used by most programs; in the highly developed stage, all programs share such information, and faculty and others use it widely and routinely. ACSCU provides further guidance with similarly structured rubrics, which are available for program learning outcomes, portfolios, capstones, program reviews, and general education assessment. Overall, the regions are experimenting with different assessment strategies and with the accreditation process itself, so that providing assistance and providing structure appear to overlap in the accreditation process.

Three: All accreditors appear to agree that public disclosure of learning outcomes assessment information is an issue of institutional integrity, and NWCCU’s 2010 Standards contains the strongest statement on publicizing student learning outcomes assessment results.

Each accreditor’s perspective on transparency is listed individually below, because each’s involvement with transparency is distinctive. For NCA-HLC, public disclosure of learning outcomes assessment information stipulates that “Results obtained through assessment of student

learning are available to appropriate constituencies, including students themselves” (NCA-HLC, 2003, p. 3.1-4, Core Component 3a). NCA-HLC is the only accreditors to specifically address students in this area. The Engagement and Service Criterion addresses the public as well as the internal groups to which organizations provide services and are accountable, and student learning outcomes assessment also falls under this category in three of the Core Components that focus on the organization’s relationship with its constituencies. In addition, NCA-HLC makes a statement about accountability projects, in which it commends institutions that participate in transparency initiatives; however, it states that these programs are not required (NCA-HLC, 2008). The programs do fall under both communications with the public and institutional integrity (NCA-HLC, 2008b). When the standards were written in 2002, the “accountability discussion was not on the table in the same what that it is today” (personal communication, July 7, 2009). A representative from NCA-HLC says that “Criteria or standards reflect the time and context in which they were created; the Commission’s Criteria were adopted in 2005. By 2007, we could see gaps in them” (personal communication, July 9, 2009). While NCA-HLC commends institutions on transparency initiatives, it also warns that such initiatives do not “substitutes for the more extensive use of data for analysis, planning and improvement, but as serious efforts to meet public calls for transparency (2008, para. 2).

Public disclosure of learning outcomes assessment information is not mentioned in the SACSCOC Standards, but a SACSCOC representative notes that “Integrity is the first standard” which says “The institution operates with integrity in all matters” (SACSCOC, 2007, p. 11, Standard 1.1). Under this policy, SACSCOC lists:

evidence of withholding information, providing inaccurate information to the public, failing to provide timely and accurate information to the Commission, or failing to conduct a candid self-assessment of compliance with the *Principles of Accreditation* and

to submit this assessment to the Commission, and other similar practices will be seen as the lack of a full commitment to integrity. (SACSCOC, 2007, p. 11)

While this policy does not directly address student learning, it underscores the need to be clear with the public about the accreditation process and implicitly links student learning to transparency. As a result, much of the QEP, which is focused on student learning, is available to the public. Moreover, “institutions are growing in their awareness of accountability understanding,” so SACSCOC does not feel the need to list institutional transparency directly in its standards (personal communication, July 10, 2009). At the same time, SACSCOC “verbally encourages institutions to be transparent. We as an organization work on our transparency. We all have an obligation to be transparent” (personal communication, July 10, 2009).

With regard to public disclosure of the learning outcomes assessment data, NEASC states that learning goals are to be published (Standard 4.4). The Standard for Public Disclosure discusses that the institution publishes its learning goals for students, and another says that the “institution has readily available valid documentation for any statements and promises regarding such matters as program excellence, learning outcomes, success in placement, and achievements of graduates or faculty” (p. 26, Standard 10.10 and 10.12). E-series forms also assist institutions in becoming more transparent. In the Spring 2009 Evaluator Workshop Manual, the PowerPoint slide on public disclosure indicates that “The institution’s printed materials and web pages should provide complete, accurate, accessible, and clear information sufficient to allow students and their families as well as interested others, to make informed decisions” (NEASC, 2009a, p. 5). NEASC staff members explain that “more institutions are moving towards making student learning outcomes assessment information public” (personal communication, July 30, 2009).

NWCCU does not appear to address public disclosure in its previous standards, but the 2010 Standards address transparency with a focus on course-level student learning outcomes, as

evidenced here “The institution identifies and publishes expected course, program, and degree learning outcomes. Expected student learning outcomes for courses, wherever offered and however delivered, are provided in written form to enrolled students” (p. 6, Standard 2.C.2). These results are also expected to be shared with “appropriate constituencies in a timely manner,” per 4.B.2 (p. 14). This expectation specifically addresses that outcomes are listed at the course, program, and degree level, and that the assessment results are shared.

The public disclosure of the information at ACCJC is seen to be an issue of institutional integrity. A majority of the institutions in this region are from California, and all Californian public institutions have transparency requirements. Pertinently, in the eligibility requirements for accreditation, a statement on Student Learning and Achievement specifies that each “institution defines and publishes for each program the program’s expected student learning and achievement outcomes” (ACCJC, 2004, p. 2). Every institution is expected to publish student learning outcomes at the program level to be eligible for accreditation. In addition, the Standards say that institutions should provide “clear and accurate information” to all of its students about courses and programs, and at the course level all students should receive a syllabus that states the learning outcomes for the course (p. 8, Standard II.A.6). Still, the eligibility requirement only refers to program-level outcomes and the Standard, though, mentions providing information to students, does not require publishing the information.

Like ACCJC, ACSCU has a majority of institutions from California and its public institutions have transparency requirements. The ACSCU Commission expects public disclosure of information stating that the institution must “demonstrate” the achievement of its graduates (p. 15, Criterion 2.6) and stipulating that the institution “makes public data on student achievement at the institutional and degree level, in a manner determined by the institution” (p. 11, Criterion

1.2). A task force on Transparency and Accountability issued a report in October 2009 to provide additional guidance on Standard 1.2 and to expand on the importance for institutions to deliver “current and easily accessible data about student achievement” to various higher education stakeholders (ACSCU, 2009, p. 5). To that end, the task force provides recommendations on what kinds of information institutions might publish and where it might appear. One recommendation is that institutions “provide links to summary explanations of their approach and to recent representative data” (p. 13). Types of “representative data” are listed in the report, with a clear indication that this transparency measure is not mandatory but recommended. The Task Force also produced rubrics that institutions may use to track their progress with regard to the transparency aspects of Standard 1.2. Commission staff pointed out that “ACSCU is requiring some degree of disclosure, but what or how the institutions disclose is not mandated” (personal communication, July 17, 2009). Institutions were not expected to respond to the updates until 2009.

MSCHE indicates under the *Fundamental Elements of Integrity* that information on institution-wide assessments should be made “available to prospective students, including graduation, retention, certification and licensing pass rates, and other outcomes as appropriate to the programs offered” (MSCHE, 2006, p. 23). In *MSCHE Policies, Guidelines, and Procedures* the “Public Communication in the Accrediting Process,” states that “Accrediting agencies and institutions must demonstrate integrity in their actions and communicate clearly to the public not only their purposes, but also whether and how these purposes are being achieved” (MSCHE, 2004, p.1). The transparency demands from the 1970s mean that the Commission will share “essential information about its standards, its procedures, and the status of its constituents” (p. 1). Even so, the policy explains that the self-study and the evaluation are private. To this end,

MSCHE encourages institutions to “hold themselves accountable for honest communication with the public on institution-related issues in which the public has a legitimate interest” (p.1) and contends that this public communication is a “matter of institutional integrity” (p.1). Institutions are asked to be honest in the process, and the Commission has shared ways that institutions can become more transparent through workshops (personal communication, July 30, 2009).

Several Commissions’ representatives mentioned that transparency, and learning outcomes assessment, became an issue in the last few years in the wake of the Spellings’ Commission report and the reauthorization of the Higher Education Act. Several national organizations are addressing transparency and they are supporting those initiatives. At the same time, several mentioned that those programs, such as the College Portrait, do not provide enough information on student learning outcomes. Even so, at this point, the majority of commissions are asking institutions to be more transparent through their integrity standards and not through student learning outcomes standards.

This issue of transparency actually works at two levels in accreditation. While this study focuses on transparency as a requirement for institutions to post their assessment information, at the C-RAC/NILOA Symposium, a robust discussion occurred as to whether institutional self-studies should also be available to the public. At the meeting Douglas Bennett said, “if we are going to stand behind accreditation as our quality assurance mechanism, we cannot hide that information; we have to make it available” (personal communication, October 14, 2009). This sentiment was echoed in an editorial that he wrote for Inside Higher Ed (Bennett, 2010). While some in attendance said that they encourage institutions to publish their information, others said that it “deteriorates the self-study process if [accreditors] make it public.” Accreditation agencies

must carefully weigh the benefits of making the accreditation process more public against the need for institutions to write an honest, useful self-study.

Four: The regional accreditors' Standards, with the exception of SACSCOC, directly address expectations for faculty to contribute to learning outcomes assessment, particularly with respect to the creation of learning goals and of plans linking assessment to improvement; SACSCOC implies this involvement in its Standards

To address the role of faculty in learning outcomes assessment, most of the regional accreditors put expectations in their standards or criteria for assessment. Each of the seven accreditors' expectations as they relate to faculty are listed below. First, MSCHE focuses on the way that faculty and administrators should work together on institution-wide assessment efforts, as stated here "Because the faculty guide decisions about curriculum and pedagogy, the effective assessment of student learning is similarly guided by the faculty and supported by the administration" (Standard 14). While this accreditor realizes that faculty reward structures need to be in place to support faculty with assessment efforts, it does not assert that this is necessary. A representative of MSCHE explained that lack of faculty involvement with assessment has not been an issue.

At NCA-HLC, the criteria emphasize faculty involvement in learning outcomes assessment very clearly, stating that "Faculty are involved in defining expected student learning outcomes and creating the strategies to determine whether those outcomes are achieved" (NCA-HLC, 2003, p. 3.1-4). Like MSCHE, NCA-HLC also requires both faculty and administrative involvement in the process. An NCA-HLC representative said that the successful institutions are the ones that are engaging faculty in the assessment process. For assessment to work, she states, "Administrators have to pave the way to make it happen, provide funds, and sustain it as a priority" (personal communication, July 7, 2009). A shift has occurred over time, so that there is "much more engagement of faculty."

ACSCU expects faculty involvement in student learning outcomes assessment in several places in the standards, specifically Standard 4.6, which states that “The faculty take responsibility for evaluating the effectiveness of the teaching and learning process and uses the results for improvement . . . ” (p. 22). While the role of faculty in the assessment process and use of results must be “significant” and “ongoing,” all levels of leadership are ultimately responsible for engaging with assessment. This Commission lists as a guideline that “Where appropriate, the institution includes in its policies for faculty promotion and tenure the recognition of scholarship related to teaching, learning, assessment, and co-curricular learning” (p. 15). Although ACSCU provides a guideline for faculty scholarship on teaching and learning, “the guidelines are not mandatory, but something to think about” (personal communication, July 17, 2009). Like NCA-HLC, ACSCU talks about engaging faculty by eschewing discussions of accountability and approaching assessment as a means of understanding student learning and improving it. The role of faculty is considered in the Capacity and Preparatory Review, where ACSCU asks, “Do faculty have resources and support to assess and improve student learning and success?” and in the Education Effectiveness Review where ask, “How do the faculty demonstrate responsibility for assessment and improvement of learning?”

ACCJC does specify that faculty need to be involved in defining student learning outcomes or, at least, in working with committees in Standard II.A.2.b. Their role is to “identify competency levels and measurable student learning outcomes” (2009, p.18). Importantly, the standards later indicate that the “institution” must regularly assess the defined outcomes (p. 5). ACCJC maintains that “assessment is faculty driven” (personal communication, July 16, 2009). Although in the Standard on leadership, the roles of many constituents are embedded in the learning outcomes assessment responsibilities, faculty responsibilities are highlighted: “The

institution relies on faculty, its academic senate or other appropriate faculty structures, the curriculum committee, and academic administrators for recommendations about student learning programs and services” (p. 22). According to ACCJC staff, the faculty were “contentious in 2002,” they “now faculty have recognized their leadership in this area and the central role that they play” (personal communication, March 16, 2009).

At NEASC, the role of faculty is discussed in three different areas of the standards (Standards 5.3, 4.47 and 5.3). The standards assert that faculty have a “substantive voice” (p. 6) in all matters of the educational programs, which would mean that they need to be involved in understanding “what and how students are learning and using the results” (p.12) for institutional improvement and for “effective teaching/learning processes and outcomes” (p. 14). While there has been some faculty resistance in this region, representatives at NEASC said that they cannot think of an institution that is putting forth assessment without faculty involvement and that, in fact, “faculty involvement is much better than it used to be” (personal communications, July 29, 2009).

At NWCCU, the standards address faculty by stating, “While key constituents are involved in the process, the faculty have a central role in planning and evaluating the educational programs” (p. 29, Standard 2.B.1). This statement was revised in the 2010 Standards, which reads that “Faculty with teaching responsibilities are responsible for evaluating student achievement of clearly-identified learning outcomes” (p. 15, Standard 4.A.3). Whereas faculty have a primary role in the evaluation of educational programs in the old standards, the new standards focus more on faculty teaching and on asking faculty to measure student achievement in regard to stated program learning outcomes.

SACSCOC does not specifically state that faculty be engaged with assessment, but does have an expectation for faculty to be involved in the academic process. Standard 3.4.1 indicates that “the institution demonstrates that each educational program for which academic credit is awarded is approved by the faculty and the administration,” and Standard 3.4.10 develops the idea further to say, “The institution places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty” (SACSCOC, 2007, p. 27, Standard 3.4.10). As such, faculty are involved with student learning because they are involved, through the program, with curriculum development. A SACSCOC representative asserts that because “faculty are an integral part of an institution’s curriculum” they are indirectly involved with the assessment activities (personal communication, July 10, 2009). According to SACSCOC representatives at the C-RAC/NILOA Symposium, assessment is supposed to have institution-wide involvement. Even so, there is not a direct mention of faculty.

All accreditors are requiring faculty involvement, and MSCHE, NEASC, NCA-HLC, and ACCJC see that institutions do not seem to be struggling with meeting this requirement. MSCHE, NCA-HLC, ACCJC, and ACSCU all note that collaboration between administrators and faculty is necessary. The main requirements for faculty are to define the learning outcomes or goals; to decide upon ways to evaluate those stated goals; and to create plans for using assessment results for improvement. Many note that faculty involvement is not an issue, and yet, in the NILOA survey, faculty involvement was listed as a problem area most often by provosts responding to the question, “What would be most helpful to effectively assess student learning outcomes?” (NILOA, 2010). Even though faculty are seen as playing a part in the assessment process, representatives at the C-RAC/NILOA Symposium said that more needs to be done to encourage faculty involvement because faculty are central to the teaching and learning process.

One regional accreditation leader said that it would be good to know more about what would make assessment worthwhile to the faculty, so that there would be a better understanding of the source of their resistance.

Five: Regional accreditors are citing deficiencies in student learning outcomes assessment with increasing frequency.

The accreditors all review institutions for reaccreditation on a ten-year cycle, except ACCJC institutions. Because ACCJC accredits two-year association degree granting institutions the cycle for students to receive their degrees is shorter, so the policy for ACCJC is to review these institutions on a six-year cycle (personal communication, July 17, 2009). The review includes a self-study report from the institutions and a peer visit. Following the visit, institutions receive a report and the commission makes its accreditation decisions. In the information provided to institutions are recommendations or follow-up requests. Every region interviewed (note that NWCCU was not interviewed) described that the demands for student learning outcomes assessment are increasing and that institutions are not meeting the expectations. For that reason, institutions must respond to the accrediting “recommendations.” In some cases, institutions respond by writing additional reports or by having additional campus visits. Often, institutions do not receive the ten year re-accreditation cycle, but a shortened one, meaning that they would have to go through the entire self-study process sooner than expected. While no schools have lost their accreditation status because of student learning outcomes assessment deficiencies, they have been required to address them. In a study examining the websites of 118 institutions that have accreditation information listed, the researchers found that 21% of these institutions showed their accreditation letter and 90% of the letters listed follow-ups in the area of student learning outcomes assessment (NILOA, forthcoming). This percentage may appear

high, but the regional accreditors also provide high numbers for the amount of institutional follow-up requested.

Because MSCHE is increasing the rigor for which it addresses the Standards, it is issuing more follow-ups (personal communication, July 30, 2009). Often the follow-ups are designed to actually assist the school to become in compliance. Assessment has been a key factor for institutions receiving warnings, probation, or, in one case, losing accreditation. In 2009, MSCHE did not renew an institution's accreditation status for the first time in twenty years. One of the main reasons that the institution did not get accredited was because of a lack of evidence that students were meeting the learning goals set by the institution. However, student learning assessment was one of many reasons (personal communication, July 30, 2009). About 2/3rds of MSCHE institutions are being asked for follow up because of assessment. While some institutions have follow-ups, others are required to have additional peer visits. Moreover, all of MSCHE decisions can be found on its website, as required by the transparency policies implemented in the 1970s.

NEASC finds that with the comprehensive evaluations, 80% of institutions have been asked for follow-up on assessment—either in the fifth year or during the comprehensive visit—and that the number is increasing (personal communication, July 29, 2009). While most think of accreditation as a ten-year cycle, NEASC policy does not guarantee ten years, so they can ask for a progress report on any schedule. If an institution understands the requirements and is progressing with its assessment activity, the commission may simply ask for it in five years. Representatives say that assessment is just one aspect of accreditation. The team also looks at finances, capacity, and leadership; as summarized by NEASC, “Assessment is on the list, but on a list of four or five” (personal communication, July 29, 2009).

An NCA-HLC representative explains that currently “Very few institutions get by without strong language on assessment” (personal communication, July 7, 2009). In fact, in a study completed in 2005, seven out of ten institutions received some sort of monitoring with the vast majority of that follow-up focusing on the assessment of student learning (personal communication, July 9, 2009). As of July 2009, 60% of focus visits, 30% of progress reports, and 40% of monitoring reports involved assessment of student learning. The three most common issues cited by teams are assessment, governance and planning, and finances (personal communication, July 9, 2009).

Typically, SACSCOC requests a follow up, imposes sanctions, or drops an institution from accreditation for a combination of reasons. Even so, “Institutional effectiveness is challenging for [SACSCOC] institutions, and there is a lot of follow up on institutional effectiveness” (personal communication, July 10, 2009). Most of the recommendations relate to Standard 3.3.1 on of Institutional Effectiveness; for instance, in December 2008, 18 out of 32 or 56% of institutions had follow-ups on program learning outcomes. In fact, in the last few years, 63% to 78% of the institutions up for review have received recommendations, which mean the institutions have follow up, with regard to the QEP standard (personal communication, July 10, 2009). In 2008, 69% of the institutions reviewed for accreditation were found noncompliant in the area of Institutional Effectiveness 3.3.1 for the off-site review. During the on-site review, 56% received recommendations, and another 36% were being monitored per the final review. In 2007, 60% of the institutions reviewed for accreditation were found noncompliant in the area of Institutional Effectiveness for the off-site review. The on-site review earned 41% recommendations, and the final review ended with 36% of the institutions being monitored. In 2008, 78% of institutions received recommendations relating to Standard 2.12, and 16% were

being monitored. For the same standard in 2007, 73% of institutions received recommendations, and 22% were being monitored. The clauses related to student learning outcomes assessment led to more institutions receiving recommendations and monitoring than any other part of the Standards.

ACSCU representatives assert that “if an institution got ten years, then we are confident they will keep going” (personal communication, July 17, 2009). It is important to note that in the last two years, only one institution has been offered ten years. However, even when ACSCU gives a ten-year accreditation cycle, its representatives state that they are “unsure about the sustainability of assessment, so, as a matter of course, [they] ask for a mid-term report” (personal communication, July 17, 2009). For the last five years of decisions, continued work on assessment has been the subject of a recommendation in almost every action letter to every institution. Reasons ranged from insufficient faculty involvement to too little evidence of a plan to sustain assessment. While institutions have not received “warnings,” ACSCU has issued formal notices of concern, shorter terms of reaccreditation, and prescriptive action letters, so that “No institution with weak assessment in the last couple of years has gotten any more than seven or eight years even if everything else is perfect” (personal communication, July 17, 2009). This shift has occurred since 2001.

ACCJC will not sanction for student learning outcomes assessment until 2012, under the assumption that institutions will need time to “come into full compliance with the new standards” created in 2002 (Beno, Memo, June 25, 2009). Even so, institutions should be accelerating, so that they will be in compliance when the time comes. Letters now often state that the “institution has made progress but needs to accelerate to get to speed by the 2012 deadline. One hundred percent of schools are about 50% done and the Nursing, Technical, and Career

schools are further ahead” (personal communications, July 16, 2009). Nevertheless, no institution is at the level of being at compliance even though there is a short deadline for them to come into compliance. The Commission staff says, that “2012 is the finish line” for student learning outcomes assessment issues, but at the same time it a “start line” because at that point, student learning outcomes assessment should be part of the culture (personal communication, March 16, 2010).

In the last chapter, sample language from accreditation letters requiring follow-up from institutions was presented. In these letters, various factors were cited to explain why institutions were receiving follow-up with accreditors. For instance, an institution might need to establish clear learning goals, to continue to develop and implement the assessment process, to use evidence for improvement, and to gain more faculty support. According to a representative at NEASC, a majority of its letters focus on assessment planning, the development of the assessment, faculty involvement or support for faculty, and budgeting for assessment; basically, he asserted that institutions are being asked to do more in these areas (personal communication, October 14, 2009).

Learning outcomes assessment is just one of the areas reviewed for accreditation, along with finances, leadership, planning and so on. Nonetheless, academic programs are a central function of higher education institutions and assessment of them is seen as central to assuring the quality of the institutions. One common misperception of assessment is that it is largely about accountability. Presently, the majority of regional commissions take actions that are purposely symbolic and meant to minimize the “material” impact of an institution’s deficiency or non-compliance. While all regional accreditors are increasing the rigors of assessment and requiring greater compliance, they are also pointing to successful examples of learning outcomes

assessment at the program and even institutional levels. Both NCA-HLC and SACSCOC were able to describe successful campuses as having clearly stated outcomes, robust program evaluation systems that rely on multiple assessment measures that align with those goals, high levels of campus involvement, and results that are being evaluated to consider ways to improve the program. NEASC adds to this list that the assessment process is sustainable and that the campus is reflecting on the next steps. The MSCHE representative provides a similar perspective, but notes that some assessment should take place on a continuous schedule. Both SACSCOC and ACSCU discuss the importance of the process being tied to budgeting and institutional planning. Though regional accreditors talk about successful campuses in the general sense, each are careful not to speak specifically of “best” or even “good” practice institutions for fear that these institutions will be mimicked exactly by other institutions, and in so doing, institutions would not be selecting assessment types that match their missions. However, several institutions present at the accreditors’ annual meetings, so they do showcase some of the “good” assessment programs in the region.

Six: Regional accreditors provide institutions with student learning outcomes assessment resources, with the exception of NWCCU.

The regional accreditation agencies use various means to provide resources for their members. For instance, they list information on their websites in various degrees, they, for the most part, provide workshops and sessions at the annual meetings, and many added assessment experts to their staff or to peer review teams. This information appears to have an influence, but this study has not examined the number of people using the websites or attending the conferences or workshops. However, conversations with the agency representatives suggest very well attended meetings and workshops, usually filling room capacity.

While every accreditor makes its standards available online, most of the accreditation agencies also provide information on assessment, with the exception of NWCCU. At minimum, all of the accreditors provide information about their assessment-related workshops or programs and their annual meetings via their websites. ACSCU provides somewhat more than most because it links not only information on assessment workshops, presentations given on student learning outcomes assessment by staff and rubrics related to assessment and educational effectiveness. SACSCOC provides the C-RAC *Principles*. NEASC provides several assessment resources on its website. The most robust website in regard to the amount of materials provided would be MSCHE, which links C-RAC documents, bibliographies, its own documents about student learning outcomes assessment (*Fundamental Elements of the Assessment of Student Learning and Optional Analysis and Evidence*), and information on assessment workshops. MSCHE's website, moreover, posts accreditation decisions for each of its institutions.

While the website presents one avenue for disseminating resources on assessment, workshops and annual meetings are another way that accreditors provide information. MSCHE offers two workshops a semester for its members to learn more about student learning outcomes assessment and about meeting the MSCHE Standards for student learning outcomes assessment. Its annual meeting often includes assessment related sessions. NEASC provides an Assessment Forum for its members as part of the annual meeting. NCA-HLC's annual meeting has a heavy concentration of assessment sessions, the contents of which are later bound and provided to attendees, or made available for purchase in *Assessing and Improving Student Learning*. SACSCOC has an annual Institute on Quality Enhancement and Accreditation, which is entirely focused on student learning outcomes assessment. Both WASC agencies, ACCJC and ACSCU, co-organized their assessment workshops and annual meeting. In cases where institutions have

an annual meeting, accreditors use the opportunity to model good practice and to provide networking opportunities that allow institutions to learn assessment practices from each other. NWCCU does not provide workshops on assessment nor does it discuss assessment during the annual meeting. There appears to be a trend toward the workshops focusing more on learning outcomes assessment itself than on accreditation expectations related to learning outcomes assessment information. Increasingly, the accreditors are asking other institutions to present workshops rather than facilitating them themselves. In some instances, assessment experts such as Peter Ewell or Trudy Banta are asked present helpful information. According to most of the accreditors, networking opportunities allow, in particular, for the institutions to identify strategies they like and determine what will work for them.

Two programs that offer a way for institutions and individuals to learn about assessment in a focused way stand out: NCA-HLC's Assessment Academy and WASC's Assessment Leadership Academy. The NCA-HLC Academy seeks to create an "institution-wide commitment to assessment of student learning" (NCA-HLC, 2010) by giving institutional teams a chance to work on an assessment projects they are trying to implement on their campuses. The Academy connects the teams with mentors, who have lead successful efforts at their own campuses. While MSCHE and WASC workshops use a team approach, the groups only meet once, whereas the NCA-HLC Academy requires the participants to make a four-year commitment, during which they work on the project, check in annually, and provide a report of the results. WASC's Assessment Leadership Academy is geared more toward individuals and takes as its goal creating assessment leaders in the region. This nine month program, which began in March 2010, offers roughly thirty participants an intensive course of study in the field of assessment, so that they can in turn train others, act as consultants, and contribute to the scholarship on assessment.

These programs require a more sustained effort than a one- or two-day workshop and aim to assist in developing campus assessment activities and assessment professionals. These programs also focus primarily on assessment, not accreditation.

Several of the commissions built on their resources by adding a staff member dedicated to student learning outcomes assessment. This is true for MSCHE, NEASC, NCA-HLC, and ACSCU. These positions were filled by candidates who had national reputations as assessment experts on the basis of their scholarship or involvement in student learning outcomes assessment. Each was hired in the last ten years with the purpose of augmenting and improving resources for student learning outcomes assessment. However, all of the assessment experts on the staff also perform other staff duties related to the general function of the office.

Besides educating members about assessment through the various programs, presentations, and publications, some accreditors send a peer evaluator with an assessment background on campus visits. For instance, MSCHE “always includes an assessment expert” on the visits (personal communication, July 30, 2009). This person could be an “IR director, a dean who has pushed assessment or a faculty member who chairs an assessment committee.” SACSCOC adds an assessment expert to the Quality Enhancement Plan peer visit. The expert is usually selected by the institution to consult with the team about the institution’s QEP (personal communication, July, 2009). ACSCU also sends along an assessment expert as part of the team for educational effectiveness visits. This representative, who can come from outside the region, has previously led a successful assessment on her own campus. While NEASC does not send an assessment expert on every visit, its teams include a reviewer with a background in assessment if an institution requires help with its assessment activities.

The effort to prepare individuals, teams, and institutions correlates to the C-RAC Principles concerning training. NEASC, NCA-HLC, and both of the WASC agencies try to avoid using national experts and instead provide ways for institutions to learn from each other. Nonetheless, MSCHE has said during the C-RAC/NILOA Symposium that there are several barriers to advancing learning outcomes assessment on campus because few institutions have “closed the loop” with assessment. In other words, identifying examples of good practice in this area is a challenge. A representative from the NCA-HLC has said that institutions need more assistance in selecting assessment tools and in building faculty expertise with assessment.

Conclusion

Based on review of the regional accreditation standards, on interviews with representatives in the regional accreditation offices and participation in the C-RAC/NILOA Symposium, this study lists six findings. These findings show that despite the existence of seven different accreditation agencies with seven different sets of standards, a degree of uniformity exists nationally in terms of the requirements for student learning outcomes assessment. All of the agencies require that institutions 1) define their learning outcomes, particularly at the program level; 2) assess these outcomes, and 3) use the assessment information for improvement. At the same time, none of the accreditors prescribes how institutions should be carry out assessments although they do provide guidelines for successful practices, and some do use very structured forms and rubrics for addressing student learning outcomes assessment. All of the accreditors would prefer wide involvement of the faculty in assessment but understand that there needs to be more development in this area in order to engage faculty and encourage them to participate. While accreditors are demanding more of institutions, they are also providing them with resources to help educate their members with regard to assessment.

While each regional accreditation agency shares commonalities with the whole, each region too has its own distinctive habitus or set of practices and strategies that have resulted not only from its engagement with its unique constituents but also from the economic and cultural factors shaping the region itself. Take, for instance, New England where the culture has been described as independent in nature because of the culture of states there, which have mottos such as Connecticut's "Land of Steady Habits" and New Hampshire's "Live Free or Die." The region also has more private colleges than many of the others. Significantly, the Commission in this region did not start officially accrediting the institutions until 1952, even though it is the oldest accreditation agency in the country (Blewett, 1959). The commission staff describes the accreditation experience as a consulting experience, in which the peers selected are highly regarded by the institution. The Commission tries to accommodate the "rhythm of the institutions, rather than impose one" (personal communication, July 29, 2009). One can tell by this example alone that the culture of the region may influence the institutions there, as well as the accreditation standards and process of NEASC. Other regions are similarly influenced by cultural, geographical, or economic factors. Both of the WASC agencies, for instance, consist primarily of California colleges. Therefore, California's state policies and the ongoing economic crisis there greatly affect the institutions in the area and the accreditors.

Because regional influences directly shape the institutions and the accreditors, the assessment process has developed in a unique way in each instance. For instance, accreditation in all the regions is self-regulating but to different degrees. Each region makes a different level or kind of effort to gain input into the regulatory process, ranging from SACSCOC, which takes a strongly democratic approach with the Collegiate Delegate Assembly, to ACSCU, which gains the membership's approval but also creates procedures that strongly guide the institutions.

Although regional differences do influence the accreditors, these differences do not preclude strategies from being transferrable—or transposable, as Bourdieu would say. Indeed, regional accreditors sometimes borrow good ideas from another. While the regions tend to work independently, the Principles create useful points of contact or even a fundamental overlap of purpose. During the interviews, each of the accreditors talked about something that was working in another region and about how they were adopting it to fit their practices. In some instances, they would discuss the opposite situation, in which they heard that something had failed to work, so they were not going to attempt it.

Expectations concerning student learning outcomes continue to evolve. The next step will soon become evident in the ways that institutions begin to use data and “close the loop,” and in the response of the accreditors to those uses. How does an institution know it is doing enough? What is the right amount of rigor? How do institutions engage faculty with assessment? Accreditors have moved away from simply seeing what is happening on campuses and evaluating institutions in their present state; they now want to know the future of institutional assessment efforts and the ways that assessment is being permanently embedded into the institutional culture. During the C-RAC/NILOA Symposium, two representatives from different regions were asked to comment on the future of student learning outcomes assessment and accreditation. Both repeated the sentiment that it is preferable for assessment to become a part of the culture rather than an external pressure, that the discussion of assessment should be moved away from accountability and toward improvement. One representative also noted that the various audiences for assessment information want different kinds of information. While campuses were concerned with course- and program-level assessment, policy makers were more interested in institution-level assessment that could be aggregated across the country. This

representative, moreover, discussed that the flurry of activity around assessment focuses too heavily on the process. While there needs to be more information concerning data use, he warned that care should be taken not to push institutions to use the data too quickly. Rather, they should learn to use it well. The other representative echoed some of the comments of the first about data use in particular, but concentrated on the importance of accreditors asking for more transparency. She was asking if accreditors could assist institutions in becoming more transparent rather than asserting that they should. How can the institutions point to ways that they know are “adding value to someone’s life” and make that information acceptable to the many audiences? Certainly, accreditation can be perceived to have had an influence on moving campuses’ assessment initiatives forward. At the same time, many questions about where and how institutions will change as a result remain to be answered.

Chapter Six

Implications and Conclusions

Implications

This study sought to answer the question, “How are regional accreditation policies and practices understood to leverage student learning outcomes assessment efforts on US college campuses?” In the study, the seven regional accreditation agencies were analyzed in the following ways; first, all regional accreditation documents related to student learning outcomes assessment were reviewed, including the accreditors’ standards; second, individuals were interviewed at each of the regional accreditation agencies (with the exception of Northwest Commission on Colleges and Universities); and third, a symposium on regional accreditation and student learning outcomes assessment was attended, at which preliminary information from this study was shared with the accreditation agencies, from whom feedback was generated. The information gathered from the documents, interviews, and symposium were reviewed and analyzed for emergent themes. These themes culminate in this chapter. First, it provides a detailed discussion of the specific findings related to accreditation practices on assessment revealing the similarities and differences between the accreditors, primarily in their stated expectations for defining, assessing, and using outcomes; for prescribing practices; for transparency; for faculty engagement; for accreditation follow-ups; and for student learning outcomes assessment resources. While these findings are presented in the previous two chapters, this chapter discusses the implications of the findings. Next, the chapter extends the specific findings of the study to describe the contradictions of regional accreditation, the importance of federal reports and policies in shaping higher education, and the presence of a fractured, but

national system of accreditation in the United States. Finally, the chapter offers recommendations for accreditation agencies and for further research.

Delineation of the findings. Developing a clearer understanding of the ways in which regional accreditation is shaping the assessment movement is a necessary next step in making the process transparent to academic institutions and the public policy community, and in increasing the degree of self-reflexivity among the accreditation agencies themselves. Examination of the individual accreditation agencies led to the emergence of six themes. Each of these themes is presented below, accompanied by a short description:

All regional accreditors expect learning outcomes to be defined, assessed, and used for institutional improvement. Ten years ago this finding would not have been true, but now all of the seven accreditation agencies expect that institutions, at minimum, have stated learning goals at the program level and appropriate emphasis on institution- and course-level goals. Moreover, institutions must go beyond stating learning goals to assessing them. Previously, campuses could have a plan to implement assessment and meet the requirements for accreditation. Now an assessment plan is not enough: institutions need to be assessing their learning goals, using multiple measures, and citing both indirect and direct evidence. All of the accreditors—although each used slightly different language—expect also that institutions will use the information gained from assessment for institutional improvement. Basically, the assessment information should be used to improve the teaching and learning enterprise of the institution. Institutional improvement has become a fundamental element of accreditation’s purpose, and by doing so, accreditors appear to be following the advice of much of the literature on student learning outcomes assessment that places the use for improvement, for both the learning and the institution, as a key factor (Walvoord, 2004; Banta, 2002; Suskie, 2004; Brown & Knight, 1994).

While regional accreditors list expectations for assessment in their standards, they also provide supplemental documents that speak more specifically to other issues or the information is part of the culture of the regions—for example, appropriate types of evidence. Though the standards provide the minimum threshold of activity for assessment, the supplementary materials and workshops provide yet more information. To what level institutions have to be held accountable to the guidelines in the supplementary materials remains unclear. For instance, SACS has indicated that the use of multiple measures is not required in its standards, but that it expects institutions to do so, because it is understood in the region. The idea of having a set of unspoken rules seems to be problematic since the accreditors standards must stand up in court if an institution is not accredited and chooses to sue the accreditor. In most cases, the courts have sided with the accreditors as in *Hiwassee College v. The Southern Association of Colleges and Schools* when the accreditors were following their policies and procedures exactly.

None of the regional accreditors prescribe assessment practices, but NEASC, NCA-HLC, SACS, and ACSCU are providing structured guidance. Each accreditor is very careful to avoid describing an exact way to carry out assessment. In fact, during interviews, each talked about the diversity of the institutions in their region, and about the need for the assessment process to reflect the local concerns of the institution. Even so, several accreditors provide guidance regarding possible ways institutions can engage the process and provide the data for accreditors. The expectations in the standards demand learning outcomes assessment activities to take place, and much of the supplemental information provides avenues for understanding the accreditors standards. There is still a lack of understanding across institutions with regard to learning outcomes assessment, despite the fact that it has been a force in higher education since the 1980s. Though questions about assessment have changed, and more policy and media

attention has been given to student learning outcomes assessment, few institutions in the country fully understand exactly what is involved to conduct and use assessment. Further, good examples of learning outcomes assessment appear to be evident largely at the program level or only in pockets at universities rather than across campuses. Institutions would very likely benefit from having additional guidance in the process at this point. At the C-RAC/NILOA Symposium, regional accreditors described their shared hope that institutions would undertake assessment for the sake of improvement rather than as the result of external pressure. However, most accreditors and scholars of accreditation believe that campuses will not internalize assessment soon, so that accreditation policy, especially in the form of further guidance on expectations, will be the prime mover in the process—and usefully so.

All accreditors appear to agree that public disclosure of learning outcomes assessment information is an issue of institutional integrity, and NWCCU's 2010 Standards contains the strongest statement on publicizing student learning outcomes assessment results. Transparency causes heated discussions between the accreditors, as evidenced by the C-RAC/NILOA Symposium. Some of the accreditors argue that by making information on the accreditation process or the assessment process transparent, institutions may feel compelled to highlight only areas where they are doing well. By contrast, if assessment results are not openly available to the public, then institutions can be more honest with what is happening on campus and describe the areas where more work is needed as well as their successes. At the same time, the accreditors ask for institutions to share information with the public honestly. Transparency is a growing issue, and both accreditors and institutions need to fully consider what will be shared with the public, as Bennett (2010) contends. While it may not perhaps be the accreditors' role or desire to require

institutions to share certain information, the last reauthorization of the Higher Education Act pushed for accreditors to require various forms of transparency, nonetheless.

The regional accreditors' Standards, with the exception of SACSCOC, directly address expectations for faculty to contribute to learning outcomes assessment, particularly with respect to the creation of learning goals and of plans linking assessment to improvement; SACSCOC implies this involvement in its Standards. Faculty involvement in the academic process seems like an obvious matter. However, getting faculty to engage with assessment of the curriculum continues to be a point on which campuses indicate that they do not have adequate support. By listing faculty in the accreditation standards, accreditors provide a “lever” for administrators to be able to gain faculty involvement and support. Very likely, as long as the conversation about assessment is tied to accreditation, faculty engagement will remain minimal. If accreditors truly want to engage faculty, they will need to think of ways to align with professional organizations or disciplinary groups, and they need to expect institutions to reward faculty for being involved in assessment. Most faculty members want to improve their courses and the curriculum for students, but are already involved in such work through many other activities. Accreditors suggest that faculty tend to perceive assessment as an additional responsibility; Hutchings (2010) purports the same conclusions. Despite calling for faculty involvement, the standards are weak in respect to means of procuring such involvement. While AASCU does provide a “guideline” suggesting that institutions reward faculty for investing time in assessment, the standards in this region and others should address the question of the terms of faculty involvement more fully.

Regional accreditors are citing deficiencies in student learning outcomes assessment with increasing frequency. All of the regional accreditors interviewed appear to be expecting

more from their members with regard to student learning outcomes, and institutions are being expected to file additional reports or to meet more frequently with accreditation teams. At the same time, one common misperception of assessment is that it is largely about accountability. These follow-up actions precisely show the tension of accountability and improvement, which though in tension are not at odds. Presently, the majority of regional commissions take actions that are purposely symbolic and meant to minimize the “material” impact of an institution’s deficiency or non-compliance but, at the same time, to motivate the campuses to move assessment forward. As the situation stands, regional commissions are treating assessment as a means to improvement more so than as a narrowly defined project of quality control. The logic of assessment practice and the symbolic value assigned to it nationally are in contention, and a broader effort to communicate with all the constituents of higher education, including legislators and the public, concerning the goals of assessment is needed.

In some ways, more follow-ups may strongly influence institutions to do more assessment work. At the same time, the reporting process and the visits are expensive in terms of money and faculty/staff time. The trend among accreditors seems to be toward shorter, more frequent visits, as evidenced by AACSB, HLC, and NWCCU, all of which have recently rethought the timing of the accreditation cycle, or are in the process of doing so. Institutions will likely prepare for and host more accreditation visits than they have in the past. Given the scarcity of resources at many institutions in the current economy, the implications are problematic.

Regional accreditors provide institutions with student learning outcomes assessment resources, with the exception of NWCCU. The accreditors are providing training to institutions. This training appears to have changed over the years as the questions related to assessment have changed. AACSB, HLC, and MSCHE mentioned that when they first started offering workshops,

they dealt with basic questions, such as “What is assessment?” The questions are becoming more complicated now that institutions are asking how to use the data. The questions do not have formulaic answers anymore, but need to be thought about in relation to the local concerns of specific campuses. The workshops on assessment are not entirely focused on accreditation. Though the institutions are likely at workshops because of accreditation, the accreditors try to not be the ones presenting the information. More than one accreditor suggested that it shies away from directly presenting information at workshops, so that institutions do not just do “what the accreditor wants” but instead does what is needed at the institution. To this end, accreditors engage national and local experts, more and more viewing the latter as the ideal resource. Representatives from institutions doing assessment are perhaps the best people to talk about assessment with similar institutions, especially because they can address more challenging questions given that they have likely grappled with similar challenges on their own campuses.

All accreditors are providing training for peer evaluators. This training includes a focus on student learning outcomes, and appears to assist the evaluators in knowing exactly what the expectations are for reviewing campuses. Most of the accreditors believe that this process of training and evaluating campuses offers the evaluators valuable experiences to take back to their home campuses.

Accreditors are building institutional capacity on campuses at the institutional level and at the individual level, and in so doing are changing the dialogue around assessment. This effort points to a lack of other venues to receive this information and to a willingness on the part of accreditors to assist their member institutions with assessment requirements. Few resources are available for institutions to learn about assessment. Some national organizations provide training workshops and conferences (for instance the Association for Institutional Research, Student

Affairs Administrators in Higher Education) and some conferences centering on student learning outcomes assessment have been developed (including the Assessment Institute and the Atlantic Assessment Conference), but there are no professional organizations for assessment and few outlets for receiving training other than one-day workshops at these events. The accreditors have developed a training process that fills a void, while also allowing for institutional learning and development. In particular, the team-based approach and the multi-day or year programs that many accreditors expect at their workshops require an institutional commitment in time and resources. While accreditors have always offered specific ways for institutions to learn from each other through networking, the question remains of whether or not they are the best resource for learning outcomes assessment training. What does it mean if an institution is not participating in the training? Or conversely, what does it mean if they do participate in the training? It appears that there is no consequence either way. Even so, would institutions be better served by another training group? Would institutions be motivated to participate in the training if it were not for sessions being linked to accreditation? In a time when university resources are scrutinized carefully, these questions will need to be addressed.

Broader implications of the findings. Unlike the last section which provides each finding and contextualizes it, this section will address broader findings of the study. In particular, this section addresses the contradictions of accreditation, the impact of federal reports and policies on higher education and the presence of a fractured, yet national system of accreditation.

First, it is the contention of this study that learning outcomes assessment is janus-faced in its dual emphasis on improvement and accountability, and that these two concerns remain in irresolvable tension within the accreditation process. This tension describes the pulling forces between the improvement and accountability, but does not place the two in negative opposition.

As indicated above, the accrediting agencies are positioning themselves as ones institutions need to be accountable, but also ones to be helpful for institutions as they engage in the process. Yet, the tension is inescapable; as Ewell (2009b) explains, assessment is almost never done for solely for accountability or improvement. Often these two concepts overlap, so that institutions are both responding to the public and reviewing their data for ways to improve. Given that accreditation is designed for quality management, accreditors look for institutions to use the information to improve, but the institutions must be accountable to the accreditors, the public, and the government.

The regulatory process is complex because of these dual roles. While many other forms of governance simply put in place accountability measures and set policies, and then let markets or other types of competition determine the results, the form that accreditors subscribe to is more like a parent/child or teacher/student relationship than a police/public one. Even so, the accreditors are accountable to the federal government, and they must go through a self-study process that is reviewed by the Council of Higher Education Accreditation (CHEA) and the newly formed version of National Advisory Committee on Institutional Quality and Integrity (the US Department of Education entity that recognizes accreditors).

While this study focused on accreditation, the concept of peer review or self-regulation is at the heart of the study. The policies and procedures are decided upon by the members, and the peers are trusted with analyzing the institutions that are up for review. Stanley Ikenberry (2009) stated that peer review must be taken seriously if public trust is to be maintained. These accreditation agencies did not start out accrediting institutions, but instead their missions were to assure quality. They later began to accredit institutions and to serve as the gatekeepers for federal funds; this role began the inherent conflict of improvement and accountability within

accreditation. It is possible that if an organization was judging the institutions from the perspective of a national ministry of education, the system would be much different—more prescribed, more standardized. Instead a model has been created in the United States that allows for institutional diversity in ways that a country with a ministry does not, as stated by Ewell (2009a) and Brittingham (2009). These same tensions underlie all forms of self-regulation. Most tensions must be acknowledged and managed appropriately to avoid the common pitfalls associated with self-regulation.

Second, beyond the accreditation process is the federal government and federal legislation, and its relationship to higher education. Federal policy reports and actions have guided the expectations for learning outcomes assessment, and the accreditors have taken as their charge to reach for new levels of accountability for institutions when it comes to student learning. The Higher Education Act placed accreditors as the go-betweens for the federal government and institutions, and the various reauthorizations of this Act make additional requirements for the accreditors.

To put the Higher Education Act into perspective, one must understand that there is a threat that during the next renewal of the Higher Education Act, more will be asked of institutions and accreditors. As Sen. Lamar Alexander (2007) aptly stated, leaders in higher education need to know “in clear terms that if colleges and universities do not accept more responsibility for assessment and accountability, the federal government will do it for them” (para. 6). He asserted that increased federal regulation will only harm American higher education and that the current system of accreditation and self-regulation provides the best way to manage accountability and retain institutional diversity. Put differently, there will continue to be a push for accountability, assessment, and a better understanding of how the accreditation

process supports constituents inside and outside of academy, which is why accreditors need to provide more transparency into the process.

In addition to the Higher Education Act, the Spellings Commission, though short-lived, has continued to impact policy, even with a new administration. This Commission elevated the conversation on student learning outcomes assessment and accreditation to a new level; accreditors had already been advocating and expecting learning outcomes assessment from institutions. What the Spellings' Commission accomplished, it appears, was to promote campus buy-in on the necessity of assessment and to give accreditors clear grounds for issuing follow-up reports due to increased expectations. Institutions know now that they need to address student learning outcomes and accountability, as evidenced in the creation of accountability initiatives such as the Voluntary System of Accountability, and University and College Accountability network. At the same time, accreditors have raised their standards and expectations for learning outcomes assessment. The increase in follow-up suggests that accreditors are demonstrating to the public and to institutions that they are serious about learning outcomes assessment. In all likelihood, they will not place an institution on probation solely on the basis of assessment issues. Proving that an institution is not doing assessment or is not doing enough assessment is difficult; as Wellman (2000) states, the decision needs to be substantiated in such a way that it can stand up to litigation. For example, proving that an institution is having financial problems means that one can review financial reports and make an assertion, it is fairly black and white. When it comes to proving that students on a campus are not learning, one has a harder time substantiating that claim. Students may be learning even if an institution is not assessing or is not documenting their assessment practices.

The urgency for accreditors and institutions to address student learning is not just because of the upcoming reauthorization of the Higher Education Act, but also because the United States government has provided stimulus funds for higher education because of the recession. The government is also proposing a goal to increase college enrollment and degree attainment. These two factors will lead to an increased interest in the quality of higher education and in knowing that these funds were well spent; the responsibility for answering such questions will fall to accreditors. Molly Broad, the current president of the American Council of Education, presented at the Higher Learning Commission's Annual Meeting in April 2010. In her presentation, she addressed the need for institutions to be prepared to show how they assess student learning, chiefly because if institutions do not do so, then the government will intervene. According to Broad:

To the extent that federal policy makers are now willing to bail out banks and other financial institutions, and to take major equity positions in our auto makers, because those companies are too big to fail, then I believe it's wise for us to assume they will have little reservation about regulating higher education now that they know it is too important to fail. (Lederman, April 13, 2010, para. 5)

In response to her assertion, Lederman (April 13, 2010) has asked, "But where will such large-scale change come from? The regional accreditors acting together to align their standards?" (para.18). Regional accreditors have become the focus of a national debate as a result of the Spellings' Commission report and the last Reauthorization of the Higher Education Act, and they continue to be discussed as the purveyors of quality in higher education. Much is not understood about how the process works or how institutions are judged, which is why increased communication with the public is essential.

Third, in answer to Lederman's question stated above, this study demonstrates that the regional accreditors have already aligned their standards to a helpful degree. The basic

expectations for learning outcomes assessment are similar across all of the regions which suggest that in important ways a national system already exists, even if it is fractured. All accreditors have similar expectations, with only marginal variations. The variations between the accreditors allow for the regions to develop creative strategies to guide the assessment practices. They can see what works and what does not across the regions and adapt their practices accordingly. A “true” national system would only stifle this creativity. As Brittingham (2008) notes, the regions have cultural, economic, and spatial connections that tie them together. Such interconnectivity between the regional accreditors means that when one is impacted by a court case or is developing a new strategy, the others tend also to react to that experience. One accreditor called another a “sister agency” when explaining a practice that was learned from that other agency. The agencies are not unlike the members of a family who have different perspectives but who share important fundamental characteristics.

Conclusion

Bourdieu’s notion of the field proves indispensable in considering the janus-face of accreditation practices, which are at once national and regional and at once concerned with improvement and accountability. Within a field, the logic of practice is often unified at the macro level but differentiated at local or micro positions within the field, just as the accreditors are unified at the national level with C-RAC but vary culturally and organizationally at the regional level. As Bourdieu (1990) points out, the logic shaping practices in a field is subject to strategic use, and the practices themselves may vary significantly, even in the pursuit of a common goal or objective. Further, a field is regulatory, but actors within the field shape and define the regulatory process through their strategic choices. The concept of the field makes it possible to understand

that a national field of accreditation exists, not only because regional accreditors all conform to C-RAC principles but because all accreditors' policies are shaped by federal pressures, including funding. However, accreditors have distinctive regional identities within this larger field, looking not only toward national concerns but also toward their regional members and constituents.

Bourdieu's concept is also relevant in thinking about the key issue of governance: accreditors are by definition both harbingers of accountability and stewards of improvement, trying to leverage the field without over-systematizing it in ways detrimental at the national, regional, or local levels. As such, they walk a fine line between normalizing the process and preserving the diversity of institutions.

The accreditors grapple with the difficulty of trying to embody two perhaps irreconcilable points of view. Bourdieu (1993, 1999) has pointed out that structural relations in a field are often "invisible, or visible only through their effects" (p. 29), and accreditors have the task of trying to articulate to constituents the complex realities that connects them to one another. One of their key strategies has been networking these constituents to let them learn from one another and taking transparency measures that help constituents understand their own central roles in shaping the regulatory process that is accreditation.

At the foundation of regional accreditation is the peer review process and respect for the diversity of American higher education institutions. The peers, since accreditation began, have been concerned with quality management of institutions, while at the same time being interested in maintaining the diversity of institutions. Since the accreditation standards are approved by the institutions themselves, this foundational element will continue to hold true, thereby allowing for institutions to make the accreditation process, as well as their campus assessment practices, their own. The larger logic of governance is reflected at all levels of the process. Under the best

circumstances, the accreditors act almost as extensions of the governing bodies of the institutions. Understanding how the field of accreditation works and how the different accreditors are connected through C-RAC, but also loosely as similar entities, allows for a logical system to emerge.

Recommendations for Policy, Practice, and Future Research

While accreditation is organized to a degree nationally, through C-RAC, the national trajectory is currently not strongly enough defined. Regional commissions need to do more internal examination to understand how their distinctive regions form their assessment practices, and they need to share their best practices as well as the results of their self-studies on a national scale, so that there is a broader understanding not only of distinctive regional pressures and concerns but also of the widest range of current practices.

The findings show that some of this activity is already taking place. Institutions are expected to advance assessment at their institutions and accreditors are steering the process with extra training and with shorter intervals for follow-up. Transparency, as it relates to communicating with the public about accreditation and assessment, appears to continue to be a challenge on several fronts.

Given the findings of this study, my recommendation would be that the accreditors attempt to update their C-RAC principles and strengthen certain shared notions, so that a unified approach to assessment as it relates to accreditation could be presented during the next Reauthorization of the Higher Education Act. A good guide for the update could be The Council for Higher Education's (CHEA) recently released list of *Effective Practices: The Role of Accreditation in Student Achievement* (March, 2010). The CHEA list includes partnership, clear

accreditation standards and policies, peer/professional review, faculty participation, public accountability and informing the public, engagement in national initiatives, student attainment, and commitment to self-evaluation. While many of the items listed as effective practices are already used by the regional accreditors, some of these areas could be strengthened through a national assessment policy discussion. Included in this discussion should be the programmatic/specialized accreditation agencies, which are also doing work in this area. This “unified approach” would have to be carefully constructed so that it still responded to the diversity of institutions, and the diversity of the regions, but could at minimum state what is expected of all accredited institutions.

The items that I would argue should be addressed are as follows. One, accreditors need to seriously consider transparency, so that both they and their members provide easily accessible information to the public. Two, faculty play a very important role in learning outcomes assessment. Efforts need to be made to engage with faculty through discipline-specific organizations or at the program level; here, too, programmatic/specialized accreditations may be a useful partner. In addition, it should be recommended that institutions compensate faculty for their work on assessment, given that such work is a new requirement. Student learning outcomes assessment activities could possibly be emphasized as part of the promotion and tenure process or as the basis for providing release time for faculty who participate. Using accountability or accreditation as the mandate for faculty to do assessment will only continue to disengage faculty. Three, with the national calls to encourage more students to attend college, accreditation should look at ways that assessment leads not only to improvement of the educational system but also to retention of students. Students are seldom discussed in the learning outcomes assessment standards. In fact, only one accreditor indicates students in its standards: NCA-HLC specifies

that students should have direct access to learning outcomes information. Though not in the standards, both MSCHE and ACSCU discussed that students should be provided assessment information to better understand the learning process (personal communications, July 30, 2009 and July 17, 2009). More attention could be placed on clarifying the intentions of student learning outcomes assessment, so that a correlation is clearly drawn between institutional improvements and student success. In addition, more involvement of students should be included in the standards. The question should be asked: “How are these initiatives providing an understanding of what students learn and how are students affected by the curriculum?” NEASC, for one, is trying to push in that direction, but more work needs to be done.

This study is limited by having only information from the accreditors’ perspectives. The field would benefit from several additional studies looking at the relationship between accreditors and the federal government and accreditors and institutions, especially from the institutional perspective on student learning outcomes assessment. One could be from a policy perspective looking at how federal policies have shifted the expectations of accreditation. Another could be a case study that looks at how the institutions are responding to the accreditation process and whether accreditation or improvement is the impetus for their efforts.

An additional study may too look at programmatic/specialized accreditation in the same way as this one looks at regional accreditation, with a next step as bridging together both studies. This type of study would be useful to understand what multiple expectations institutions are facing in regards to accreditation.

If an investigator could gain access to accreditation letters, examination of them would make for an interesting study. Currently, all of Middle States information is available on-line, so one could look at those letters to see the kinds of views and recommendations institutions are

grappling with as the result of assessment. From there, the investigator could go on to do a follow up with the institutions to see what changes occurred because of the recommendations it received from the accreditors.

Summary

It appears that the accreditors are in many ways more similar than different in regard to their expectations for learning outcomes assessment. Even so, each has its own “habitus” or set of practices that is influenced by the region. Involvement in C-RAC and adherence to the Principles set forth by this organization help to structure the field, so the logic of accreditation practice is the result of regions sharing and discussing strategies, making these strategies transferrable—or transposable. However, the expectations are different enough that they are not understood by the larger audience, so a more structured response to learning outcomes assessment that was more easily communicated would be beneficial. In addition, the accreditors need to figure out ways to help institutions engage faculty, because only with faculty support will assessment truly be effective. Finally, more attention needs to be paid to the role of students in the assessment process, so accreditors should consider ways to require for student involvement.

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Appendix A

Questionnaire for Web Reviews

Presence:
Where is assessment present on the Web site? If so, where?
Is Assessment embedded in the standards for accreditation?
Clarity and Strength of the Expectation:
What language does the Accreditor use with regard to Assessment?
Is there a date on the document that mentions assessment?
Nature of Outcomes to be Assessed:
Does the accreditor require that learning outcomes be defined?
Does the language indicate “which” learning outcomes are to be defined and assessed?
Does the accreditor specify what strategies can be used to assess (ie. Portfolio, course completion, licensure, etc)?
Use of Outcome Assessment Data:
Does the standard state expectations for the use of learning outcome assessment data?
Public Disclosure of Outcome Data:
What expectations, if any, pertain to disclosure, transparency, of learning outcome data for consumer information or general public disclosure?
Faculty and Governing Board Engagement:
Does the Accreditor have expectations for faculty engagement with assessment?
Does the Accreditor have any expectations for the engagement of the governing board (trustees, regents) with learning outcome data?
Continuous Improvement, Learning Organization:
Do the standards cite expectations for continuous improvement of learning?
Internal Organization:
Does the Accrediting group ask for information or have expectations regarding the organization for assessment?
Other Engagement with Assessment by the Accreditor:
Does the Accrediting group offer training programs or workshops on the assessment of student learning outcomes available to institutional members?
Does the Accrediting group offer materials or guides or other resources on assessment?
Does the annual meeting program of the Accrediting Group incorporate sessions related to outcome assessment?
Is there other evidence of engagement?
General:
What is considered a successful LOA campus?
What other important aspects should be noted in understanding the position of the accrediting association with respect to learning outcome assessment?
Enforcement and Consequences:
What action has the accrediting agency taken over the last five years with respect to issues of learning outcome assessment? For example, have reaccreditation decisions been delayed? Have institutions been placed on probation? Have letters or other exchanges with institutions dealt with assessment deficiencies? Have institutions been commended for best practices in the development and effective use of assessment data?

Appendix B

Questionnaire for Semi-Structured Interviews

The following information serves as sample interview questions. The questions may change slightly for each accreditor depending on information found in the accreditation standards.

Overarching Research Question:

How are regional accreditation policies and practices understood to leverage student learning outcomes assessment efforts on US college campuses?

PRESENCE, CLARITY AND STRENGTH OF EXPECTATIONS, NATURE OF OUTCOMES TO BE ASSESSED

Research Question(s):

- What do the standards say the requirements/expectations are for learning outcomes assessment?
 - Do they define student learning outcomes?
 - If so, what do they say?
 - What specifically constitutes a student learning outcome?

Sample Interview Question(s):

Student learning outcomes assessment is embedded in your organizations standards for accreditation. These questions will respond to what I have read from your standards. I am hoping that you could help clarify certain aspects of them for me.

- As background information, do you know when you began to include learning outcomes assessment requirements and how have these changed over the years?

Your standards do not define learning outcomes assessment, but instead leave it up to the institution.

- Does the accreditation association have a shared definition of what is meant by learning outcomes assessment?
- Do you share that with institutions?
- Do the assessors who visit the campus know this definition?
- Where can it be found?
- If there's not a specific definition, what is the breadth of accepted learning outcomes assessment items? For instance do you expect more direct (tests, assignments, projects, portfolio, licensure examinations, etc) or indirect (retention, graduate, placement rates, surveys of students, etc) measures?
 - Why did you make choices for certain items over others?
 - What qualifies as a good range of student learning outcomes?
- If you expect the institutions to provide the definition, what types of definitions do you receive from them?
- How is "excellence" or "quality" defined in regards to student learning outcomes assessment on campuses?

USE OF OUTCOMES ASSESSMENT DATA

Research Question(s):

- What expectations do the accreditors provide for the use of the data?
 - For improvement?
 - Transparency?
 - Other?

Sample Interview Question(s):

From the Standards, I noticed that you talk directly about the use of data for institutional improvement (or for improving teaching and learning, or for improving programs and services).

- How do you enforce that institutions are using the information for improvement?
- Could you give me examples of what successful institutions do to fulfill this requirement?

As you know, transparency of student learning outcomes assessment has been a part of the national dialogue on the topic. Your accreditation organization says that the information should be available to perspective students (or that this information is published or doesn't mention transparency).

- How do you enforce transparency?
- Who has influenced your decision to expect transparency?
- What are the successful campuses doing in respect to transparency?
- Why do you not expect transparency?
- Do you endorse any of the national transparency programs? (VSA, UCAN, etc)

PROCESS OF ASSESSING STUDENT LEARNING OUTCOMES

Research Question(s):

- Does the accreditor specify a framework within which learning outcomes assessment is to be addressed?
 - Do they, for instance, mention involvement of faculty, boards, administrators, etc?
 - Do they provide mechanisms such as AQIP or Quality Enhancement Plan?

Sample Interview Question(s):

Your standards say that institutions should involve faculty in student learning outcomes assessment (or they do not specifically mention involving faculty).

- What role should faculty play in student learning outcomes assessment?
- How is faculty involvement enforced?
- Who else should be involved?

I saw on your Web site that you have an Assessment mechanism, such as AQIP or Quality Enhancement Program.

- Could you tell me how that program came to be and how it works with the accreditation process?

OR, you do not seem to have a formal program for student learning outcomes assessment.

- Has your organization thought about creating such a program?

ENFORCEMENT OR CONSEQUENCES OF ASSESSING STUDENT LEARNING OUTCOMES

Research Question(s):

- How does learning outcomes assessment figure into site visits, team reports, accreditors' actions and decisions?

Sample Interview Question(s):

What one cannot pull from the Web sites and the written standards are the enforcement or consequences for assessment of student learning outcomes. I am going to ask a few questions that help me understand the force behind the standards.

- What action has the accrediting agency taken over the last five years with respect to issues of learning outcome assessment? For example, have reaccreditation decisions been delayed? Have institutions been placed on probation? Have letters or other exchanges with institutions dealt with assessment deficiencies? Have institutions been commended for best practices in the development and effective use of assessment data?
- What does a successful campus look like with regards to learning outcomes assessment?

RESOURCES FOR ASSESSING STUDENT LEARNING OUTCOMES

Research Question(s):

- Are the regional accreditors providing resources to institutions on strategies for learning outcomes assessment?
 - Do they offer materials on learning outcomes assessment?
 - Do they provide workshops or programs?
 - Do they discuss learning outcomes assessment at annual meetings?

Sample Interview Question(s):

I see that you offer workshops on assessment.

- What was the impetus to begin to offer workshops?
- Are they well attended?
- Could you share with me the materials that you offer on student learning outcomes assessment?

Appendix C

Email Message for Solicitation of Interview

Dear Accreditation Administrator,

My name is Staci Provezis and I am the Project Manager for National Institute for Learning Outcomes Assessment (NILOA). One aspect of this project is to understand the influence that accreditation has on colleges and universities as it relates to student learning outcomes.

I am writing to ask for your assistance in providing me information about your accreditation commission. More specifically, I would like to visit you at your office for an interview. The interview will likely take an hour or two of your time.

I do not anticipate any risk to this study greater than normal life. The feedback that you provide me will assist with the understanding of accreditation's role in student learning outcomes assessment at colleges and universities. The information you provide will become the basis for a monograph on this topic that will be presented for a Symposium sponsored by NILOA and C-RAC on October 14th in Indianapolis, Indiana. In addition, the information may be used for scholarly reports, journal articles, dissertations, and conference presentations.

Given the public position of the accrediting agency and the small number of accreditors, the accrediting agency will be named in publications and presentations. This research is not about your personal opinion on student learning outcomes assessment and accreditation, but is about the accreditation association's stance on the subject and how it is communicated with institutions of higher education. This information is likely shared on a daily basis with institutions with whom you work, so it should involve minimal risk for you to share the information with the project. Your participation in this project is completely voluntary, and you are free to withdraw at any time and for any reason without penalty. Your choice to participate will not impact your job or status. You are also free to refuse to answer any questions you do not wish to answer. You will receive a copy of the research results after this project is completed.

With your permission, I would like to schedule our meeting at your earliest convenience.

If you have any questions about this research project, please contact me by telephone at 217-244-2155 or by e-mail at sprovez2@illinois.edu

Sincerely,
Staci Provezis

Appendix D

Consent Form for Semi-Structured Interviews

You are invited to participate in a research project which examines the role of accreditation in student learning outcomes at colleges and universities. This project will be conducted by Staci Provezis the Project Manager for the National Institute of Learning Outcomes Assessment (NILOA).

In this project, Staci will conduct a semi-structured interview which will last approximately one to two hours. In the interview, which will be audio taped with your permission, you will be asked about your commissions role with learning outcomes assessment. The audiotapes and all other information obtained during this research project will be kept secure. The audiotapes will be kept in a locked file cabinet and will be accessible only to project personnel. The audiotapes will be transcribed and will be erased after the project is completed.

I do not anticipate any risk to this study greater than normal life, and I anticipate that the results will increase our understanding of how accreditation influences colleges and universities in their adoption of learning outcomes assessment.

Given the public position of the accrediting agency and the small number of accreditors, the accrediting agency will be named in publications and presentations. This research is not about your personal opinion on student learning outcomes assessment and accreditation, but is about the accreditation association's stance on the subject and how it is communicated with institutions of higher education. This information is likely shared on a daily basis with institutions with whom you work, so it should involve minimal risk for you to share the information with the project.

Your participation in this project is completely voluntary, and you are free to withdraw at any time and for any reason without penalty. You are also free to refuse to answer any questions you do not wish to answer. You will receive a copy of the research results after this project is completed.

The research from this project will provide the basis for a monograph on this topic that will be presented for a Symposium sponsored by NILOA and C-RAC on October 14th in Indianapolis, Indiana. In addition, the information may be used for other scholarly reports, journal articles, dissertations, and conference presentations.

If you have any questions about this research project, please contact Staci Provezis by telephone at 217-244-2155 or by e-mail at sprovez2@illinois.edu

Sincerely,

Staci Provezis

I have read and understand the above information and voluntarily agree to participate in the research project described above. I have been given a copy of this consent form.

Signature

Date

I do agree to have the interview audio taped for the purposes of transcription.

Signature

Date

If you have any questions about your rights as a research participant please contact Anne Robertson, Bureau of Educational Research, 217-333-3023, or arobrtsn@illinois.edu or the Institutional Review Board at 217-333-2670 or irb@illinois.edu