



Roles and Responsibilities in Student Learning and Accreditation

- Views from the State Higher Education Executive Officers –

May 23, 2007

The Secretary of Education's Commission on the Future of Higher Education and the subsequent review of federal regulations dealing with accreditation by the U.S. Department of Education have energized a national dialogue on fundamental issues concerning student learning, quality assurance, educational effectiveness, and transfer of credit. We applaud the Secretary's leadership in launching this discussion.

The material issues raised by the Department in this rule-making process require responsible action by the states, institutions, the academic disciplines, and accrediting associations. We believe, however, that expanding the scope and force of federal regulation will not be an effective response. States, institutions, and accreditors can and should address them using the means already at their disposal.

Improving learning -- assuring quality control

The flexibility of the American system of higher education is an important source of its strength. Its diversity, broad purposes, and continuing expansion have generated substantially different approaches to teaching and learning and varying standards for learning attainment and degrees among different postsecondary institutions.

Despite the value of diversity, we believe the variation in standards and student learning among accredited, degree granting institutions is too wide. All institutions should be actively engaged in improving student learning, and those institutions who fail to meet minimum standards in curricular goals and student achievement should be required and enabled to improve.

We applaud the work of accrediting associations to promote the clear definition of learning objectives and more rigorous assessment of student learning outcomes. These efforts will benefit all students in all institutions. More is needed, however. Higher education and the nation would benefit from more explicit *minimum* standards for the knowledge and skills required for different degrees, such as those emerging in other developed economies. All students and institutions would benefit from clear standards of knowledge and skill for academic degrees, as well as from systematic efforts to improve student learning above minimum standards.

The proper response to this need is not to homogenize learning standards – that would almost surely lower, rather than raise authentic educational attainment. Nor would it be productive for any government, state or federal, to establish learning standards. Academic standards are a responsibility of the academic community; and through accrediting associations, degree granting institutions should be held accountable for rigorous academic standards resulting in demonstrable student achievement.

We urge accreditors, in collaboration with general and disciplinary academic associations, to define standards of knowledge and skill for various degrees, especially the general education aspects of the associate and baccalaureate degree. These standards should be a point of reference for institutions as well as for accreditors in assessing student achievement and acceptable institutional quality. While our voluntary national and regional accrediting associations need not be amalgamated into a single entity to accomplish this purpose, the credibility of American academic degrees will erode if they fail to develop a working consensus on fundamental standards.

Transfer of credit

It is in the best interests of students, institutions, and the nation for students to be able to transfer credit for demonstrated academic achievement easily and efficiently from one institution to another. Institutions have an obligation to make their policies for transfer of credit transparent to applying students and to establish policies and practices which fairly consider and evaluate previous learning and academic credit. A fair assessment of credit for prior learning will not arbitrarily deny consideration of credit based solely on the accredited status of another institution. It is legitimate, however, for an institution to consider the accredited status of another institution, evidence concerning accrediting practices, student assessment practices, and the performance of previously transferred students from particular institutions.

Many states, and even some voluntary institutional consortia, have convened faculty from different institutions to develop course equivalencies or common numbering systems, based on course content and standards that materially facilitate transferability of credit. While such efforts can be time consuming and require continuous updating, they have eased transfer for many students. Such work will become less difficult as the academic community makes more progress in establishing common standards and better approaches for assessing student learning. Using different approaches, some state systems have attained “automatic” transferability among certain institutions. Regardless of the mechanism, all transfer practices bear obligations for fairness, consistency, transparency, and judgments based on evidence.

The transparency of transfer policies and the fairness of their implementation are legitimate issues in the review of an institution's effectiveness and qualifications for accreditation. These should not, however, be "bright line" issues for determining eligibility for accredited status.

Roles and Responsibilities

The United States has well-established traditions of institutional freedom and flexibility and of differing roles for the federal and state governments in setting public policy, supporting, planning, and delivering higher education. Because these roles overlap in serving common public purposes, a working consensus among responsible parties is essential. Periodic reconsideration of these roles is to be expected.

In our view the established roles and responsibilities in American higher education should not be changed. States, accreditors, and institutions, however, should give more emphasis to transfer,

setting standards, and assessing student learning. As a contribution to the continuing discussion, our view of appropriate roles follows.

The Federal Government

The federal government has a right and responsibility for setting rigorous qualifying standards for federal financial assistance and for enforcing them to prevent the victimization of students, fraud, and abuse of the public trust. By virtue of these responsibilities, the federal government also has the right and responsibility for setting reasonable standards for the accrediting associations on which it relies to determine qualification for federal programs. In this function, however, the federal government should not seek to materially shape or constrain the work of institutions and the states in delivering instruction, setting learning objectives, or degree requirements.

The federal government also has played a key role in providing information on higher education, including the IPEDS surveys and large scale assessments of learning, such as NAEP and NAAL. These valuable contributions should be enhanced in order to help the nation keep pace with educational and economic progress around the globe.

State Governments

In our federal system, states, the "owners and operators" of public institutions, have much greater responsibilities than the federal government for overseeing public institutional operations. They also have direct responsibilities for licensing and regulating the operation of all institutions. The quality and success of higher education require the states to set clear state goals for higher education, and to plan, govern, and support higher education to achieve those goals. As public needs grow and change, the effectiveness of the states in performing these roles is increasingly important.

Each state also has an interest in monitoring general levels of academic attainment in its citizenry and the performance of college students and graduates in professional examinations and other capstone assessments. States should not, however, seek to hold higher education institutions "accountable" for each student's learning. Such "fine-grained" approaches to institutional accountability may encourage institutions to exclude students with substantial learning needs who can still benefit from higher education, or become a bureaucratic exercise which can overshadow and overwhelm essential faculty and student-based attention to defining learning objectives and assessing their achievement.

Consequently, the states should exercise forbearance in the regulation and control of institutional activities. The core responsibilities for academic standards and integrity rest with the academic community, and the effective operation of a higher education institution requires flexibility. While states have a responsibility to hold institutions accountable for *what* they achieve, states cannot achieve public goals by prescribing *how* institutions do their work.

Accrediting Associations

Accrediting associations cannot perform the functions of states, governing boards, institutional leaders, or faculty members. Nor can they be expected to exercise the authority and bear the obligations of government.

They have made important contributions, however, in setting standards for institutional operations, requiring institutions to examine their own effectiveness in light of their mission, and providing assistance and direction to institutions seeking self-improvement. And they have made significant progress in promoting and requiring more disciplined attention to student learning objectives and outcomes in institutions.

As suggested above, however, the nation needs clear minimum standards for postsecondary degrees, and we believe the accrediting associations, in collaboration with each other and with academic leaders, should tackle that responsibility. Moreover, accreditors and the federal government should explore creative ways of serving the important administrative obligations of the federal government without losing other important benefits of the accreditation process.

Institutional responsibilities

Institutional leaders (trustees and administrators) are directly responsible for creating the necessary conditions and assuring that faculty teach, conduct research, and establish and enforce standards of academic quality.

Institutions should be obligated by their states and/or governing boards to define expected learning outcomes and assess their achievement by students for each academic program. This fundamental responsibility includes reasonable disclosure of outcomes for groups of students.

The quality of institutional practices and policies in the area of student learning is a legitimate focus for accrediting reviews and state oversight, but we believe a single approach for the nation would be unworkable.

At the same time, substantial improvements are needed in many institutions in the policies and practices for setting learning goals, assessing performance, and improving student learning. While a number of institutions have done excellent work in this area, all can improve, and many, even with a strong faculty and student body, can and should improve substantially.