

3.4 Developments in the United States of America

Concern about what and how much students are learning in US colleges and universities continues to be expressed in public debate (see Box 20), with occasional calls for governments to mandate the reporting of student performance using tests and surveys fitting to the purposes of different Higher Education institutions. Carey puts a case for improving the transparency of performance and price information (value for money information) as a means of exploiting more widely the benefits of on-line learning technologies and processes (Carey, 2010).

Earlier concerns were raised in the mid 1980s with the formation of an “assessment movement” in higher education (Ewell, 2001). Four particular factors came into play at that time. The first was an extension up the grade ladder of public concern about under-performance in the K-12 schooling sector. The second was a growing employer interest in the preparedness of a ‘21st Century workforce’, with the expansion of occupations for which school education was no longer sufficient. The third and related factor was the growth in forms of achievement-based credentials in professional and technical fields, and the need for ways of evaluating equivalences for credit transfer and further student learning. Fourth, the increasing use of distance education, gave rise to the need for institutions to demonstrate equivalence between on-campus instruction and other modes of learning:

“As distance delivery became asynchronous and student-centred, demonstrated student mastery of the subject matter became the only way in which academic progress could be judged. The result has been increasing pressure on accreditors to develop review approaches that are capable of looking at instructional programs that are not anchored in ‘seat time’, and that involve resource levels and configurations quite different from those which established standards were designed to address” (Ewell, 2001).

The 1983 publication of *A Nation at Risk: The Imperative for Educational Reform* by the US Department of Education put American higher education on notice that either the providing institutions would have to develop effective ways of assessing student learning or the government would impose a standardised means of doing so (Hamilton & Banta, 2008). From the 1980s, regional accrediting agencies in the US began to adopt a different approach to accrediting standards, shifting from a focus on desirable organisational characteristics to pay attention to the actual results or ‘outcomes’ of institutional efforts (Stella & Woodhouse, 2006). In 1989, the US Department of Education required for the first time that accrediting organisations examine student learning outcomes as a condition of institutional accreditation, with a desire to set a threshold standard below which an institution is deemed unacceptable. However, this approach made accreditation “somewhat irrelevant to institutions performing above the threshold” (Woodhouse, 2006).

Box 20. The need for comparable information about student attainment

“The biggest problem with American higher education (is) that too many of the students who do enroll aren’t learning very much and aren’t earning degrees. For the average student, college isn’t nearly as good a deal as colleges would have us believe. Nobody knows which colleges really do the best job of taking the students they enroll and helping them learn over the course of four years... As a result, colleges are far less focused on student learning than they should be, and consumers haven’t a clue what to do and have come to believe, mistakenly, that the most expensive colleges are also the best. The near-total lack of useful information about teaching and learning has three main effects, all bad for students. First, it creates distortions in the higher-education market that drive up prices. Second, it gives colleges free rein to ignore their teaching obligations in favor of a mad contest for status and self-gratification. Third, it leaves colleges that serve the most disadvantaged students with the fewest resources.

The solution is to gather much more comparable, publicly available information about teaching and learning. That would allow institutions to pursue a robust, value-based marketing strategy, to make the case that their learning results meet or exceed other, more expensive competitors. It would also open up the market to new

competition. Information-poor, reputation-driven markets penalize new entrants, who have to wait for public perception to catch up with reality. This is particularly difficult when the industry leaders opened up shop in the seventeenth century. Online higher education offers new avenues for competition, and that segment of the industry is rapidly expanding. But lack of information about learning is hurting students by creating ample space for charlatans and scam artists to operate while simultaneously tarring the best online educators with the taint of the unproven and new.

The federal government should make major new investments in research development to create new survey and testing instruments like National Survey of Student Engagement (NSSE) and the Collegiate Learning Assessment (CLA). Once the data systems and new instruments have been developed and fine-tuned, Congress should insist that all colleges and universities accepting federal funds regularly report teaching, learning, and long-term student employment results. It wouldn't be a one-size-fits-all process—colleges serve a diverse array of students and have a wide variety of scholarly and social missions. Each would have discretion to pick measures that fit who they are and what they do. But the measures would have to be credible, comparable, and publicly available.”

Carey, K. (2010).

3.4.1 The Spellings Commission

Further impetus to improve Higher Education performance information and the comparability of student attainment was given by the Spellings Commission in 2006. A significant motivation behind the Spellings Commission's formation by the Bush administration was the fear that the American higher education system is deteriorating, failing to prepare the American workforce for the rigours of the globalised marketplace, and falling behind its competitor countries (see Box 21). The report referred to “a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students.” It called for a major program of cost-cutting and productivity improvements and the creation of a “consumer-friendly database” so that parents and students can compare institutions on “how much students learn in colleges or whether they learn more at one college than another.” The database could eventually contain data such as the “learning outcomes of students” creating a nationwide system for comparative performance purposes, using standard formats. The Commission argued that colleges might have a more vested interest in the success of their students if this information were made public to prospective students and their parents (American Council on Education, 2008).

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Box 21. The Spellings Commission's diagnosis of malaise in US Higher Education

“We are losing some students in our high schools, which do not yet see preparing all pupils for postsecondary education and training as their responsibility.

Others don't enter college because of inadequate information and rising costs, combined with a confusing financial aid system that spends too little on those who need help the most.

Among high school graduates who do make it on to postsecondary education, a troubling number waste time—and taxpayer dollars—mastering English and math skills that they should have learned in high school. And some never complete their degrees at all, at least in part because most colleges and universities don't accept responsibility for making sure that those they admit actually succeed.

As if this weren't bad enough, there are also disturbing signs that many students who do earn degrees have not actually mastered the reading, writing, and thinking skills we expect of college graduates. Over the past decade, literacy among college graduates has actually declined. Unacceptable numbers of college graduates enter the workforce without the skills employers say they need in an economy where, as the truism holds correctly, knowledge matters more than ever.

The consequences of these problems are most severe for students from low-income families and for racial and ethnic minorities. But they affect us all.

Compounding all of these difficulties is a lack of clear, reliable information about the cost and quality of postsecondary institutions, along with a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students. The result is that students, parents, and policymakers are often left scratching their heads over the answers to basic questions, from the true cost of private colleges (where most students don't pay the official sticker price) to which institutions do a better job than others not only of graduating students but of teaching them what they need to learn."

Beyond high school, more students than ever before have adopted a "cafeteria" approach to their education, taking classes at multiple institutions before obtaining a credential. And the growing numbers of adult learners aren't necessarily seeking degrees at all. Many simply want to improve their career prospects by acquiring the new skills that employers are demanding. In this consumer-driven environment, students increasingly care little about the distinctions that sometimes preoccupy the academic establishment, from whether a college has for-profit or non-profit status to whether its classes are offered online or in brick-and-mortar buildings. Instead, they care—as we do—about results."

US Department of Education (2006), *A Test of Leadership: Charting the Future of US Higher Education*. A Report of the Commission Appointed by Secretary of Education Margaret Spellings. Washington, DC.

The findings and recommendations of the Spellings Commission that are relevant to the matters covered by this paper are 'learning' and 'transparency and accountability'. Extracts from the 2006 report are presented below.

Learning

"As other nations rapidly improve their higher education systems, we are disturbed by evidence that the quality of student learning at US colleges and universities is inadequate and, in some cases, declining. A number of recent studies highlight the shortcomings of postsecondary institutions in everything from graduation rates and time to degree to learning outcomes and even core literacy skills. According to the most recent National Assessment of Adult Literacy, for instance, the percentage of college graduates deemed proficient in prose literacy has actually declined from 40 to 31 percent in the past decade. These shortcomings have real-world consequences. Employers report repeatedly that many new graduates they hire are not prepared to work, lacking the critical thinking, writing and problem-solving skills needed in today's workplaces. In addition, business and government leaders have repeatedly and urgently called for workers at all stages of life to continually upgrade their academic and practical skills. But both national and state policies and the practices of postsecondary institutions have not always made this easy, by failing to provide financial and logistical support."

"Students must have clearer pathways among educational levels and institutions and we urge colleges to remove barriers to student mobility and promote new learning paradigms (e.g., distance education, adult education, workplace programs) to accommodate a far more diverse student cohort. States and institutions should review and revise standards for transfer of credit among higher education institutions, subject to rigorous standards designed to ensure educational quality, to improve access and reduce time-to-completion."

Transparency and Accountability

"We have noted a remarkable shortage of clear, accessible information about crucial aspects of American colleges and universities, from financial aid to graduation rates. Because data systems are so limited and inadequate, it is hard for policymakers to obtain reliable information on students' progress through the educational pipeline. This lack of useful data and accountability hinders policymakers and the public from making informed decisions and prevents higher education from demonstrating its contribution to the public good."

“We believe that improved accountability is vital to ensuring the success of all the other reforms we propose. Colleges and universities must become more transparent about cost, price, and student success outcomes, and must willingly share this information with students and families. Student achievement, which is inextricably connected to institutional success, must be measured by institutions on a “value-added” basis that takes into account students’ academic baseline when assessing their results. This information should be made available to students, and reported publicly in aggregate form to provide consumers and policymakers an accessible, understandable way to measure the relative effectiveness of different colleges and universities.”

“Our complex, decentralized postsecondary education system has no comprehensive strategy, particularly for undergraduate programs, to provide either adequate internal accountability systems or effective public information. Too many decisions about higher education—from those made by policymakers to those made by students and families—rely heavily on reputation and rankings derived to a large extent from inputs such as financial resources rather than outcomes. Better data about real performance and lifelong working and learning ability is absolutely essential if we are to meet national needs and improve institutional performance.”

“Traditionally, institutional quality is measured primarily through financial inputs and resources. In today’s environment, these measures of inputs are no longer adequate, either within individual institutions or across all of higher education. Despite increased attention to student learning results by colleges and universities and accreditation agencies, parents and students have no solid evidence, comparable across institutions, of how much students learn in colleges or whether they learn more at one college than another. Similarly, policymakers need more comprehensive data to help them decide whether the national investment in higher education is paying off and how taxpayer dollars could be used more effectively.”

“The commission supports the development of a privacy-protected higher education information system that collects, analyzes and uses student-level data as a vital tool for accountability, policy-making, and consumer choice. A privacy-protected system would not include individually identifiable information such as student names or Social Security numbers at the federal level. Such a system would allow policymakers and consumers to evaluate the performance of institutions by determining the success of each institution’s students without knowing the identities of those students. It is essential for policymakers and consumers to have access to a comprehensive higher education information system in order to make informed choices about how well colleges and universities are serving their students, through accurate measures of individual institutions’ retention and graduation rates, net tuition price for different categories of students, and other important information. Right now, policymakers, scholarly researchers, and members of the public lack basic information on institutional performance and labor market outcomes for postsecondary institutions. This is particularly true for measuring outcomes from the work of those institutions that serve the growing proportion of nontraditional students who do not begin and finish their higher education at the same institution within a set period of time.”

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The main recommendations of the Spellings Commission regarding the measurement and reporting of student learning outcomes are reproduced at Box 22.

Box 22. Spellings Commission Recommendations on measuring and reporting student learning outcomes

- The federal government should provide incentives for states, higher education associations, university systems, and institutions to develop interoperable outcomes-focused accountability systems designed to be accessible and useful for students, policymakers, and the public, as well as for internal management and institutional improvement
- Higher education institutions should measure student learning using quality-assessment data from instruments such as, for example, the Collegiate Learning Assessment, which measures the growth of student learning taking place in colleges, and the Measure of Academic Proficiency and Progress, which is designed to assess general education outcomes for undergraduates in order to improve the quality of instruction and learning.
- Faculty must be at the forefront of defining educational objectives for students and developing meaningful, evidence-based measures of their progress toward those goals. The results of student learning assessments, including value-added measurements that indicate how much students' skills have improved over time, should be made available to students and reported in the aggregate publicly. Higher education institutions should make aggregate summary results of all postsecondary learning measures, e.g., test scores, certification and licensure attainment, time to degree, graduation rates, and other relevant measures, publicly available in a consumer-friendly form as a condition of accreditation.
- The collection of data from public institutions allowing meaningful interstate comparison of student learning should be encouraged and implemented in all states. By using assessments of adult literacy, licensure, graduate and professional school exams, and specially administered tests of general intellectual skills, state policymakers can make valid interstate comparisons of student learning and identify shortcomings as well as best practices. The federal government should provide financial support for this initiative.
- The National Assessment of Adult Literacy (NAAL) should be administered by US Department of Education at five- instead of ten-year intervals. The survey sample should be of sufficient size to yield state-by-state as well as national results. The NAAL should also survey a sample of graduating students at two and four-year colleges and universities and provide state reports.
- Accreditation agencies should make performance outcomes, including completion rates and student learning, the core of their assessment as a priority over inputs or processes. A framework that aligns and expands existing accreditation standards should be established to (i) allow comparisons among institutions regarding learning outcomes and other performance measures, (ii) encourage innovation and continuous improvement, and (iii) require institutions and programs to move toward world-class quality relative to specific missions and report measurable progress in relationship to their national and international peers. In addition, this framework should require that the accreditation process be more open and accessible by making the findings of final reviews easily accessible to the public and increasing public and private

Higher education institutions should measure student learning using quality-assessment data from instruments such as, for example, the Collegiate Learning Assessment, which measures the growth of student learning taking place in colleges, and the Measure of Academic Proficiency and Progress, which is designed to assess general education outcomes for undergraduates in order to improve the quality of instruction and learning.

sector representation in the governance of accrediting organizations and on review teams. Accreditation, once primarily a private relationship between an agency and an institution, now has such important public policy implications that accreditors must continue and speed up their efforts towards transparency as this affects public ends.

US Department of Education (2006), *A Test of Leadership: Charting the Future of US Higher Education*. A Report of the Commission Appointed by Secretary of Education Margaret Spellings. Washington. DC.

3.4.2 Developments after Spellings

On 20 June 2007 Margaret Spellings wrote to Republican Senator Lamar Alexander (Tennessee) indicating that she would not propose new accreditation rules. In the context of the report of the Spellings Commission on the Future of Higher Education and other calls for increased accountability, accreditation was one of the most controversial topics in reauthorisation of the *Higher Education Act* in 2008. The amended Act now makes it explicit that threshold standards required for accreditation are distinct from the standards that institutions set for themselves in respect of student attainment:

"The act reflects the essential historic distinction and collaborative relationship between institutional standards and accreditation standards regarding student achievement. An institution sets its own specific standards and measures consistent with its mission and within the larger framework of the accreditation standards. In consultation with institutions, accreditors set common standards that are used to review all of the institutions they accredit. The act forbids the Education Department from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement" (American Council on Education, 2008).

The Spellings approach was seen as increasing the regulatory burden on institutions, strengthening federal powers relative to the states, and reducing diversity (Reeves, 2006; AAUP, 2006). Nevertheless, there was some support for increased standardisation, including on progressive grounds, with a particular focus on building enabling capabilities and improving the quality of information available to help students navigate a diverse higher education system:

"...attacks on educational standardization simply mirror and reinforce American education's disconnected, fragmented status quo. American colleges today can indeed be proud of their impressive intellectual and disciplinary diversity. What is far less impressive, however, is their record in helping students negotiate that diversity by providing them with the skills needed to make sense of it" (Graff & Birkenstein, 2008).

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In the post-Spellings context, the Higher Education Opportunity Act (HEOA) requires all postsecondary institutions participating in Title IV federal student aid programs to post a net price calculator on their websites by October 29, 2011. Additionally, the amended Act (Title 20, 1015e) makes provision for a State Higher Education Information System Pilot, in up to five states, to "improve the capacity of States and institutions of higher education to generate more comprehensive and comparable data, in order to develop better-informed educational policy at the State level and to evaluate the effectiveness of institutional performance". The Congressional prohibitions against prescribing national standards and associated assessments, which were written into HEOA on the initiative of Senator Lamar Alexander in 2007, remain in effect.

On 31 July 2008, Congress completed reauthorisation of the Higher Education Act (HEA) by passing the Higher Education Opportunity Act (HEOA). The HEOA reauthorises HEA provisions for six years, through September 30, 2014. The main provisions of the HEOA, relevant to the topics of this paper, as summarised by the American Council on Education (ACE, 2008), are outlined below:

Accreditation

- **Student achievement:** The act reflects the essential historic distinction and collaborative relationship between institutional standards and accreditation standards regarding student achievement. An institution sets its own specific standards and measures consistent with its mission and within the larger framework of the accreditation standards. In consultation with institutions, accreditors set common standards that are used to review all of the institutions they accredit. The act forbids ED from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement.
- **Due process:** The act prescribes due process procedures for adverse actions by accreditors. For example, an accreditor's appeal body must be separate from its initial decision-making body and must be subject to a conflict of interest policy. Accreditors must allow institutions to submit new evidence during an appeal process when the accreditor's adverse action is based solely on failure to meet financial standards and new evidence consists of "significant financial information" unavailable before the adverse action.
- **Distance education:** ED shall not require an accreditor to have separate standards, procedures or policies for evaluation of distance education. Accreditors must, however, require institutions that offer distance education to establish that a student registered for a distance education course is the same student who completes and receives credit for it.
- **Respect for mission:** The act requires accreditors to apply standards that respect the stated mission of institutions, including religious missions.
- **Transparency in accreditation:** Accreditors must make publicly available a summary of their actions, including adverse actions such as denial or withdrawal, the reasons for the adverse action and the affected institution's official comments concerning final denial or withdrawal of accreditation.
- **National Committee on Institutional Quality and Integrity (NACIQI):** The act restructures NACIQI, which advises ED on recognition of accreditors and related matters. In the past, the secretary of education has appointed all NACIQI members. Under the act, the secretary and members of the House of Representative and the Senate from both parties will appoint 12 members (six from each body). Membership will expand from 15 to 18 and appointment terms will increase from three to six years. Current members' terms will end on the date of enactment of the act. New members cannot be appointed until January 31, 2009.
- **Diploma mills:** The Act defines "diploma mill" for the first time. ED will maintain information and resources on its web site to help students, families and employers identify and avoid diploma mills, and will continue to participate in interagency efforts to combat them.

The act forbids ED from establishing criteria that specify, define or prescribe the standards accreditors use in assessing an institution's success with respect to student achievement.

President Obama's first speech to a joint session of the Congress on 24 February 2009 addressed "the urgent need to expand the promise of education in America" and raise levels of educational attainment (see Box 23).

Box 23. President Obama's challenge on post-secondary attainment

"In a global economy where the most valuable skill you can sell is your knowledge, a good education is no longer just a pathway to opportunity—it is a prerequisite. Right now, three-quarters of the fastest-growing occupations require more than a high school diploma. And yet, just over half of our citizens have that level of education. We have one of the highest high school dropout rates of any industrialized nation. And half of the students who begin college never finish. This is a prescription for economic decline, because we know the countries that out-teach us today will out-compete us tomorrow.

That is why it will be the goal of this administration to ensure that every child has access to a complete and competitive education—from the day they are born to the day they begin a career. That is a promise we have to make to the children of America. Already, we've made an historic investment in education through the economic recovery plan. We've dramatically expanded early childhood education and will continue to improve its quality, because we know that the most formative learning comes in those first years of life. We've made college affordable for nearly seven million more students—seven million. And we have provided the resources necessary to prevent painful cuts and teacher layoffs that would set back our children's progress.

We know that our schools don't just need more resources. They need more reform. That is why this budget creates new teachers—new incentives for teacher performance; pathways for advancement, and rewards for success. We'll invest in innovative programs that are already helping schools meet high standards and close achievement gaps. And we will expand our commitment to charter schools.

It is our responsibility as lawmakers and as educators to make this system work. But it is the responsibility of every citizen to participate in it. So tonight, I ask every American to commit to at least one year or more of higher education or career training. This can be community college or a four-year school; vocational training or an apprenticeship.

But whatever the training may be, every American will need to get more than a high school diploma. And dropping out of high school is no longer an option. It's not just quitting on yourself, it's quitting on your country—and this country needs and values the talents of every American. That's why we will support—we will provide the support necessary for all young Americans to complete college and meet a new goal: By 2020, America will once again have the highest proportion of college graduates in the world."

President Barack Obama. Address to the Joint Session of Congress, 24 February 2009.

The Bush administration's rationale for performance reporting was largely couched in consumer-economy terms: "potential students and their parents would use outcomes information to help them shop for a college or university, and the effects of their choices on market forces would steer institutional behavior" (Ewell, 2009). One major perceived difference between the Obama and Bush White Houses is that "while the Bush administration often seemed to dislike and disparage higher education, the Obama administration will be tough on colleges because its officials value higher education and believe it needs to perform much better, and successfully educate many more students, to drive the American economy" (Lederman, 2010a). Another difference is that the Obama administration is more interested in the contribution of postsecondary attainment to the competitive capacity of the US. The President's 2009-10 Budget Request includes a new College Access and Completion Fund to build partnerships to improve students' success in and completion of college, particularly students from disadvantaged backgrounds. The Budget Request includes \$500 million in Fiscal Year 2010 and proposes a \$2.5 billion, five-year initiative. Institutions can expect more rigorous reporting requirements relating to student success. However, to date the indications

...the Obama administration will be tough on colleges because its officials value higher education and believe it needs to perform much better...

from the Obama administration are indirect in respect of any intention to revisit the national standards agenda, particularly through standardised testing and related comparative performance reporting, but there are sufficient indications such that “colleges and universities cannot afford to stop their own quest to develop meaningful evidence of student learning” (Lederman, 2010a).

At the beginning of 2010 it was being reported that “State policy makers, parents and others—troubled by continually rising prices and low completion rates, and worried about whether students are being well prepared for work and life—grow less and less willing to accept colleges’ traditional assertions to “trust them” that students are learning” (Lederman, 2010a). For their part, many higher education institutions have been intensifying their assessment of student learning, although their efforts may be seen to be piecemeal and inwardly focused: “assessment activity on campuses can be found in nooks and crannies of the institutions—by individual professors, or in one department—and it is often not tied to goals set broadly at the institutional level” (Lederman, 2010b). Hence, a new imperative is penetrating the contemporary thinking of university and college leaders: on the one hand, institutions must adopt a more integrated approach to assessment linked to the learning goals that students should derive from the curriculum; and on the other hand, they must seriously address the comparability goal on which policy makers insist to hold institutions accountable:

“A legitimate process for evaluating learning outcomes has to... be consistent, it needs to be understandable to someone other than the institution itself, and... it needs to be judged relative to some kind of standard” (Kevin Carey Address to the Council for Higher Education Accreditation (CHEA) meeting, January 2010, reported in Lederman, 2010a).

The Bush administration’s accountability strategy is seen by many current leaders to have been ill-advised because “it emphasized assessment over standards—focusing on getting colleges to use common measurements of learning outcomes and envisioning a federal role in defining what students should know ” (Lederman, 2010a). An alternative approach to the Bush administration’s preference for standardised testing as the best way to persuade the public (and politicians) that meaningful learning is taking place, is under active consideration and, in some areas, piloting. This approach involves “making transparent the professional judgments that instructors make about their students’ work”:

“Given the technology that is available today, it is not difficult to imagine panels of experts reviewing the grades and scores that professors at different institutions have given to their students, with the goal of “anchoring” in the norms of the field the professors’ judgments about how successfully the students have achieved a set of common learning goals. Countries such as Singapore and Ireland have adopted such approaches, getting away from having no standards to having standards that are tracked either by testing or by professional judgment that is transparent. You anchor the judgment by being public with others who share the responsibility for teaching and learning—not the federal government, and not the testing companies” (Peter McWalters, reported in Lederman, 2010a).

“Countries such as Singapore and Ireland have adopted such approaches, getting away from having no standards to having standards that are tracked either by testing or by professional judgment that is transparent.”

The Obama administration is seen to have “quietly endorsed and expanded its predecessor’s push to get states to build student databases that are designed, first and foremost, as accountability tools to produce better data on how students move (or don’t) through the educational pipeline” (Lederman, 2010a). At a national conference of accrediting bodies in January, the Under Secretary of Education, Martha J. Kanter, is reported to have echoed many of the criticisms that her predecessors in the Bush administration made of higher

education's process of self-governance, saying that "accreditation is not transparent enough" and urging higher education to "join us in working toward a modern 'culture of accountability.'" Kanter called for the self-studies that colleges produce in accreditation to be made public (Lederman, 2010a).

The smouldering distrust between the accrediting bodies and the US Department of Education was reignited by the Department issuing in February a 76-page draft "Guide to the Accrediting Agency Recognition Process" which the accreditors regarded as too prescriptive and "a backdoor way to avoid Congressional limitations on the government's ability to regulate accreditors" (Lederman, 2010b).

At the Higher Learning Commission's annual meeting in April, national higher education leaders spoke in unison: "The federal government is dead serious about holding colleges and universities accountable for their performance, and can be counted on to impose undesirable requirements if higher education officials don't make meaningful changes themselves" (Lederman, 2010c). One of the speakers linked the Obama administration's approach to higher education to its approach to financial and environmental policy where previously weak regulation had led to catastrophe:

"...given that the pendulum has swung toward increased regulation in virtually all sectors of our society, and that the Education Department's recent actions have made clear that national and regional accreditors' ability to judge quality is under the microscope, we cannot lay low and hope that the glare of the spotlight will eventually fall on others. If we fail to act, it is likely that change will be imposed upon us, with potentially serious consequences for the governance structure that has allowed the United States to develop the best, most inclusive higher education system in the world" (Molly Broad, President of the American Council on Education, reported in Lederman, 2010c).

The shock to the academic community of the Bush administration's attempt "to remake institutional accreditation as an aggressive federal quality assurance tool" (Ewell, 2009) gave rise to post-Spellings initiatives "designed to re-assume the academy's responsibility for publicly assuring academic quality" (Ewell, 2009), such as the Voluntary System of Accountability, and the New Leadership Alliance for Student Learning and Accountability. These initiatives, designed to position higher education institutions in advance of the next HEA reauthorisation (in 2014) are taking on renewed relevance in the Obama presidency, but the directions for their development are hotly contested.

3.4.3 The Voluntary System of Accountability (VSA)

The Voluntary System of Accountability (VSA) is an initiative by public 4-year universities to supply basic, comparable information on the undergraduate student experience through a common web report—the College Portrait (see Box 24, and **Attachment B**). The VSA was developed in 2007 by a group of university leaders and is sponsored by two higher education associations—the Association of Public and Land-grant Universities (APLU) and the Association of State Colleges and Universities (AASCU). Development and start-up funding was provided by the Lumina Foundation. Beginning in 2010, the VSA is supported by the participating institutions through annual dues ranging from \$500 to \$2500 and based on total student enrolment (http://www.voluntarysystem.org/index.cfm?page=about_vsa).

Box 24. VSA College Portrait

I. Consumer Information

The data elements in the first three pages of the College Portrait template address the question: "What information would be most helpful to prospective students and their families in deciding which college or university best fits their educational wants and needs?" Costs of attendance, degree offerings, living arrangements, student characteristics, graduation rates, transfer rates, and post-graduate plans are included.

There are two innovations of particular note—the student success and progress rate and the college cost calculator. The success and progress rate provides a more complete picture of student progress through the higher education system rather than focusing on the graduation rate from only one institution. Such a measure

is increasingly valuable as the majority of students now attend more than one institution before they graduate. The college cost calculator is a tool for students and their families to more accurately estimate the net cost of attending a particular institution. Studies have demonstrated that many students, particularly low income students, do not consider attending college because they mistakenly believe the cost of attending is much higher than it actually is.

II. Student Experiences and Perceptions

The second section of *College Portrait* provides a snapshot of student experiences and activities and their perceptions of a particular college or university by reporting the results from one of four student engagement surveys. Links to other institutional evaluations of campus life are also provided.

Institutions will select one of four student surveys to conduct at its campus and report results within six specified constructs that academic research has shown to be correlated with greater student learning and development: group learning, active learning, experiences with diverse groups of people and ideas, student satisfaction, institution commitment to student learning and success, and student interaction with faculty and staff. Under each of the six constructs, student responses to specific questions will be reported to maintain rough comparability across survey instruments.

III. Student Learning Outcomes

The third section of the *College Portrait* template reports evidence of student learning in two ways. At the top of the page, institutions provide a description of how they evaluate student learning. This description includes links to institution-specific outcomes data such as program assessments and professional licensure exams.

Source: www.collegeportraits.org.

Note: VSA participants must include a net cost calculator within College Portrait by 31 December 2010.

VSA reflects a self-governing response to the community's need for transparency and accountability:

"State and federal policy makers and student or parent consumers of higher education services are increasingly calling for higher education to demonstrate what it says it delivers. While any long-term professional in higher education concludes, based on her or his experience, that it adds value in terms of student learning and student growth, the academy has not been able to effectively demonstrate and communicate this value added effect in a credible fashion to many in the above audiences"
(The American Association of State Colleges and Universities, 2008).

The objectives of the VSA are to:

- Provide a useful tool for students during the college search process
- Assemble and disseminate information that is transparent, comparable, and understandable
- Demonstrate accountability and stewardship to the public
- Support institutions in the measurement of educational outcomes and
- Facilitate the identification and implementation of effective practices as part of institutional improvement efforts (McPherson & Shulenburger, 2006a).

...a centrally mandated system "could result in inaccurate and unfair comparisons of institutions that serve different students, disciplines, and missions"

The principles underpinning the VSA are markedly different from those reflected in the approach of the Spellings Commission. A federally mandated testing system is seen to be harmful, as it is "is unlikely to recognize the important differences among institutions, be inflexible and cause damage to the vitality and independence of US higher education" (McPherson & Shulenburger, 2006a). Additionally, a centrally mandated system "could

result in inaccurate and unfair comparisons of institutions that serve different students, disciplines, and missions” (McPherson & Shulenburger, 2006a). The VSA allows for differentiation by type or classification of university or college, and for multiple measures to enable comparisons of like with like.

The VSA is experimenting with the use of different instruments for assessing higher education learning outcomes. The three tests chosen are:

- **Collegiate Assessment of Academic Proficiency (CAAP)**, two modules: critical thinking and writing an essay. CAAP is a product of The American College Testing Program, Inc.(ACT).
- **Collegiate Learning Assessment (CLA)**, complete test including a performance task and an analytic writing task (consisting of a make-an-argument and a critique-an-argument prompt). The CLA measures critical thinking, analytic reasoning, problem-solving, and written communication. CLA is a product of the Council for Aid to Education (CAE).
- **Measure of Academic Proficiency and Progress (MAPP)**, two sub scores of the test: critical thinking and written communication. MAPP is a product of Educational Testing Service (ETS).

In the 2007 pilot, 328 VSA participants measured critical thinking, analytic reasoning, and written communication using one of three tests. Reports at institutional level include a value-added calculation, based on a random sample of some 100-200 students. Learning gains or value-added scores reflect the difference between the actual and expected scores of graduating and entering students, taking into account the academic ability of the students. Each of the three testing organisations will use the same method to compute and characterise their learning gains or value-added scores for VSA purposes: *Well Above Expected, Above Expected, At Expected, Below Expected, and Well Below Expected*.

Two types of report are published by each VSA participating institution on College Portrait:

1. Learning Gains Between Freshman Year and Senior Year
2. Learning Gains Between Entering Transfer Students and Senior Transfer Students

The increase in learning on the performance task was what would be expected at an institution with students of similar academic abilities. The increase in learning on the analytic writing was at an institution with students of similar academic abilities.

There has been considerable debate and research into the various conceptual, policy and methodological issues involved, particularly with regard to the contentious matter of assessing value-added (see Box 25).

Box 25. Measuring Institutional Value-Added in Higher Education

“Of course many things happen to a student between the freshman and senior years that are unrelated to the education provided by the university, e.g., travel, development of a wider social network, summer and academic year jobs, and each of these may have an effect on standardized test scores. Nonetheless, it is clear that selecting one of the normalization techniques is required to refine the measurement such that it comes closer to approximating only the value added by the university.

We are aware that controversy surrounds value-added measurements. Measurement difficulties do not diminish our resolve that value added is the appropriate outcome measure upon which to focus. It does mean that the developing science of value-added learning measurement must be sensitive to these relationships and that a value-added measure initially chosen by a university may have to be reconsidered as additional research results are amassed. One therefore must regard value-added measurement as still in the “experimental” stage.

Accordingly, we cannot at this time recommend the selection of a single test for all universities subscribing to a national public university accountability system. Instead, we recommend that a set of three or at most four outcomes tests be selected by the universities participating in VSA and that each university in the interim select the one test from that set that measures best the core educational outcomes goals that the school has designed its curriculum to produce.

Interpreting the meaning of specific test score performance levels may be problematic. Any value-added approach involves generating raw test scores, so the value-added focus we recommend does not preclude the availability of test score data. A serious problem that remains for general education assessment testing is the difficulty of ensuring that the students tested are motivated to perform at their best level while taking the tests. This problem is generally not a matter of concern when students are taking classroom exams or the ACT/SAT or GRE exams as the test-takers are motivated by self-interest to do well. General education standardized exam performance, by contrast, has no impact on the test taker but may have consequences for the university. Every campus naturally wants to show its best face and thus there will be the temptation to administer the test to non-random samples of students, e.g., to high-ability individuals. Unless uniform sample selection procedures are agreed to and rigorously observed on every campus, the willingness of campuses to participate in any general education assessment venture and particularly their willingness to make results public will be undermined.

Unfortunately, there are no standardized tests that measure campus-wide the value added for the entire undergraduate educational experience. Constructing such a test is extraordinarily difficult as campuses have diverse sets of majors and degree programs and the likelihood of getting agreement on common educational outcomes is low. In addition, the sheer number of majors at US universities is in the hundreds so the effort to develop a comprehensive suite of major-specific outcomes tests is mammoth.”

McPherson & Shulenburg, 2006a.

Note: The SAT Reasoning Test (formerly Scholastic Aptitude Test and Scholastic Assessment Test) is a standardised test, of critical reading, mathematics and writing skills, for college admissions in the United States. The ACT (American College Test) is a standardised test of English, mathematics, reading and science reasoning. The GRE (Graduate Record Exam) includes the GRE General Test and GRE Subject Tests (Biochemistry, Cell and Molecular Biology; Biology; Chemistry; Computer Science; Literature in English; Mathematics; Physics; Psychology). GRE scores are used for admission to graduate schools along with undergraduate records, letters of recommendation and other testimonials.

3.4.4 Dissent within the VSA ranks: opposition to standardised testing

The University of California was one of a number of institutions to reject standardised testing as the appropriate way to assess learning outcomes within the VSA: “using standardized tests on an institutional level as measures of student learning fails to recognize the diversity, breadth and depth of discipline-specific knowledge and learning that takes place in colleges and universities today” (Dynes, 2007).

The Consortium on Financing Higher Education (COFHE) also rejected standardised testing:

“Based on our experience, we are skeptical about efforts to make this kind of assessment through standardized tests, including those that purport to measure critical reasoning... [A]ssessment experts are far from agreement about whether ‘value added’ can be measured accurately across diverse institutions” (COFHE, 2008 cited in Thomson & Douglass, 2009).

Thomson & Douglass (2009), drawing on Klein, Benjamin & Shavelson (2007) point out the key assumptions underpinning the use of the CLA for comparing value added by higher education institutions:

- *“First, for accountability purposes, valid assessment of learning outcomes for students at an institution is only possible by rigorously controlling for the characteristics of those students at matriculation.*
- *Second, by using SAT scores as the control for initial student characteristics, given how well the CLA tests have been designed and validated as measures of general cognitive skills, it is possible on the basis of surprisingly small samples to calculate the difference between freshman and senior test performance and compare that difference to that predicted or expected on the basis of student characteristics at entry.*

- *Third, this relative performance or value-added can in turn be compared to the relative performance or value added achieved at other institutions, hence providing the most valid or fair comparison of how well a college is performing in terms of student learning” (Thomson & Douglass, 2009).*

However, testing of these assumptions, led them to conclude that:

“the CLA and the SAT are so highly correlated that the amount of variance in student learning outcomes to be accounted for after controlling for SAT scores is incredibly small and most institutions will simply be in the expected range. The results are also sample-dependent in ways not recognized by CLA (for example, student motivation). Finally, the design that compares the test performance of a sample of freshmen and a sample of seniors cannot isolate institutional value-added from other characteristics of institutions and their students that affect student learning, but have nothing directly to do with the instructional quality and effectiveness of an institution” (Thomson & Douglass, 2009).

...research over a long period “casts serious doubt on the validity of using standardized tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions”.

Banta has suggested that research over a long period “casts serious doubt on the validity of using standardized tests of general intellectual skills for assessing individual students, then aggregating their scores for the purpose of comparing institutions” (Banta, 2007). Her findings (see Box 26) have led her to conclude that:

“standardized tests of generic intellectual skills do not provide valid evidence of institutional differences in the quality of education provided to students. Moreover, we see no virtue in attempting to compare institutions, since by design they are pursuing diverse missions and thus attracting students with different interests, abilities, levels of motivation, and career aspirations” (Banta, 2007).

Box 26. A warning on measuring learning outcomes

“Standardized tests of general intellectual skills (writing, critical thinking, etc.):

- test primarily entering ability (e.g., when the institution is the unit of analysis, the correlation between scores on these tests and entering ACT/SAT scores is quite high, ranging from .7 to .9), therefore differences in test scores reflect individual differences among students taking the test more accurately than they illustrate differences in the quality of education offered at different institutions.
- are not content neutral, thus disadvantage students specializing in some disciplines.
- contain questions and problems that do not match the learning experiences of all students at any given institution.
- measure at best 30% of the knowledge and skills faculty want students to develop in the course of their general education experiences.
- cannot be given to samples of volunteers if scores are to be generalized to all students and used in making important decisions such as the ranking of institutions on the basis of presumed quality.
- cannot be required of some students at an institution and not of others-yet making the test a requirement is the only way to ensure participation by a sample over time.”

If standardized tests of general intellectual skills are required of all students,

- and if an institution’s ranking is at stake, faculty may narrow the curriculum to focus on test content.
- student motivation to perform conscientiously becomes a significant concern.
- extrinsic incentives (pizza, stipends) do not ensure conscientious performance over time.

- ultimately, a requirement to achieve a minimum score on the test, with consequences, is needed to ensure conscientious performance. And if a senior achieves less than the minimum score, does that student fail to graduate despite meeting other requirements?

Banta, 2007.

The University of California has developed its own comprehensive Accountability Framework, including students' self-reported measures of learning obtained through the University of California Undergraduate Experience Survey (UCUES). A report on its usefulness for measuring learning outcomes related to the purpose and nature of academic programs and the characteristics of students concludes that institutionally linked measures of student learning can be meaningful for reporting purposes:

"The UCUES's census design, and the array of questions that can then be linked with a great variety of other institutional data (such as grades), may give institutions, such as the University of California, a better tool than standardized tests for gauging learning outcomes, at the campus-wide level, and perhaps most importantly at the level of the major or among specific demographic groups" (Brink et al. 2010).

Thomson and Douglass (2009) note that Margaret Spellings herself has recanted the Spellings Commission's 'one-size-fits-all' approach, asserting that "all colleges should be allowed to describe their own unique missions and be judged against that" (Spellings, 2008).

3.4.5 The new Leadership Alliance for Student Learning and Accountability

The Alliance, which was incorporated in March 2009, arose from a meeting in June 2007 convened by the Teagle Foundation, AAC&U and CHEA, of representative associations, accreditation agencies, researchers, and interested faculty and administrators. The purpose of the meeting was to examine whether the political climate around the Spellings Commission "warranted a more unified response to issues of effectiveness and assessment, transparency and accountability—turn the political pressure into an opportunity to develop more proactive, educationally valid approaches to improving student learning and reporting educational outcomes in ways that would address public concerns" (www.Newleadershipalliance.org, accessed 8 August 2010).

In January 2008, *New Leadership for Student Learning and Accountability: A Statement of Principles, Commitments to Action* was published. The document described challenges facing higher education, articulated broad principles concerning setting educational goals, gathering evidence, communicating results, and the roles and responsibilities of various stakeholders around these issues. It also suggested a number of broad actions that "to address the vital issues of transparency and accountability through rigorous attention to the performance of our colleges and universities." These included disseminating and promoting the New Leadership document, promoting greater definition and clarity with regard to educational goals, encouraging the continued development of accountability templates, promoting and publicising the range of assessment efforts, working with a variety of constituencies (philanthropy, government, business) on these issues, to "constantly monitor the quality of student learning and development, and use the results both to improve achievement and to demonstrate the value of our work to the public," and to "regularly report to the public on the overall progress made in achieving these actions."

The Alliance is focusing on three primary areas: certification, accountability templates, and network building. The certification initiative will create recognition for institutions that are leading the way on assessment and accountability, will help establish the norms for good practice and offer an incentive for institutions to develop assessment and accountability processes in a more systematic way. The Accountability Templates are designed to add to the reporting framework under the Voluntary System of Accountability and other systems.

3.4.6 Opposition to the VSA: revisiting the Spellings agenda

Referring to President Obama's February 2009 speech to the joint session of Congress, where he set a goal of raising postsecondary attainment to the world's highest level by 2020, Kelly & Aldeman (2010) suggest that American higher education faces a new challenge: "while previous reform efforts have focused on increasing *access* to higher education, increasing postsecondary *attainment* will require higher levels of college retention and completion; colleges and universities will have to do a better job of serving the students they enroll" (Kelly & Aldeman, 2010). They contend, referring to the Spellings' finding of "a remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students" that voluntary arrangements for institutional accountability fall short of what the Obama challenge requires. With particular reference to the VSA, they identify three main deficiencies :

"Not all institutions participate, particularly those at the top and bottom of the quality scale. The site does not allow for the easy comparison of institutions, despite the fact that the database was created to facilitate consumer choice. And many of the most crucial VSA data elements are incomplete, non-comparable, or selected in a way that often obscures differences between institutions" (Kelly & Aldeman, 2010).

The first noted deficiency is the crucial one; the others can be addressed through procedural and technical means, if the participating institutions have the will. Kelly & Aldeman identify two basic options in the design of public policy for educational accountability: "a top-down system of government-mandated standards, assessments and rewards; or a more diffuse, market-oriented system where choices made by informed consumers help to regulate providers" (Kelly & Aldeman, 2010). With regard to the former, they contend that "this heavy-handed model is ill-suited to regulate a sector as diverse as higher education." With regard to the latter, they argue that the available information must cover all supply options. If America must lift the performance of its lowest performing institutions the community needs to know how far they fall below the highest performing institutions:

"...if market accountability is to compel low-performing schools to improve, it is important that consumers are able to compare quality and costs across the entire population of institutions, not only those that volunteer to become more transparent" (Kelly & Aldeman, 2010).

From this perspective, the VSA is seen more as a political tactic than a solution to the underlying problem: a "firebreak" designed to slow the momentum for a government-mandated accountability regimen:

"Since institutional interests drive the design and implementation of voluntary systems of accountability, these systems are primarily designed to hold back prodding regulators, while consumer interests are likely to be a secondary concern" (Kelly & Aldeman, 2010).

While that may be a true motive, there are some difficulties with the Kelly & Aldeman line of argument. In large and diverse systems there is no straight line from bottom to top, as if the differences in what is being offered are differences only of degree. A linear approach to comparison cannot operate meaningfully because the important differences between institutions and programs in such systems are differences of kind. Consumers exert market pressure on price and service

"Not all institutions participate, particularly those at the top and bottom of the quality scale."

In large and diverse systems there is no straight line from bottom to top, as if the differences in what is being offered are differences only of degree. A linear approach to comparison cannot operate meaningfully because the important differences between institutions and programs in such systems are differences of kind.

primarily when they are shopping to buy within a product class where they can compare like with like. It is not evident in most markets that the competition among prestige goods helps improve the performance of those in the bargain basement.

3.4.7 Tuning USA

A subsequent initiative by Lumina Foundation, titled Tuning USA, is a faculty-led pilot project designed to define what students must know, understand and be able to demonstrate after completing a degree in a specific field. Tuning USA is based on the European Tuning work to increase the transparency around what a degree represents under the Bologna Process. The initiative is linked to the goal of “increasing the share of Americans with high-quality postsecondary degrees and credentials from 39 percent to 60 percent by 2025. Because the nation’s overall degree-attainment rate has not risen in 40 years, Lumina and higher education leaders are focusing on new models that build on existing learning outcomes efforts in the United States and abroad”(Lumina Foundation, 2010).

Tuning USA is focusing on defining expectations of graduate learning outcomes, in terms of subject-area knowledge and generic skills, in six disciplines: biology, chemistry, education, graphic design, history, and physics. With a focus on the employability of graduates, the exercise is being conducted as an educational experiment in Utah, Indiana and Minnesota (see Box 27).

Box 27. Tuning USA

“A general theme of the effort is that degrees will have more meaning if there is a consensus about what they mean, and if that consensus is based on learning objectives and skills, not credits earned or courses completed. Clifford Adelman, one of the leading American experts on the Bologna Process and the enrollment patterns of American students, is working with Lumina and the state teams on the tuning project. In a statement, Adelman said it was important to shift the way American colleges define degrees.

“When US colleges and universities describe what students must do to earn a degree in a specific field, they list courses, credit requirements and a minimum grade-point average,” Adelman said. “They do not typically state what students with the degree should know and be able to do in ways that employers, policy makers and the public can immediately understand. We need to embrace a more comprehensive approach to defining the learning that degrees represent or risk falling further behind our global counterparts.”

A document from Lumina outlining the advantages of tuning states that the “process makes the value of any degree more clearly visible and more directly comparable by and among students, academics and employers. It also highlights—in real-world terms—the institution’s contribution to the value of that degree. It serves as a starting point for shared definitions of quality and excellence. And it does this without limiting the flexibility and diversity of the individual institutions.”

State study groups—which will include faculty members and students—will focus on the disciplines selected by the states to determine appropriate learning outcomes and competencies. The goal is to relate these goals directly to the employability of graduates.

In making the announcement, Lumina stressed the desirability of having common expectations for programs, but also emphasized that individual colleges would still control their own offerings.

“While the phrasing of these outcome statements can vary among institutions, all must observe the agreed-upon reference points and templates. For each learning outcome, faculty in the discipline can then establish performance criteria, or definitions of what a student must demonstrate to attain that outcome,” the Lumina document states.

“Each school or department in the discipline designs its own curricular program, delivery methods and assessments to help students attain the agreed-upon learning outcomes. The reference points and templates are arrived at in broad consultation through surveys and field testing with faculty members, students, employers, previous graduates, and faculty in other disciplines from the same institution. The product of the Tuning process in each discipline is a public statement of learning outcomes and criteria of attainment.”

The European process of tuning had the challenge of crossing national boundaries. But the references in the Lumina announcement to colleges' ability to construct their own programs reflect what may be a challenge in the United States. While the norm for European higher education is the large state university or the state polytechnic system, American higher education prides itself—to a degree unusual compared to most other countries—in the diversity of institutions.

In an effort to encourage the development of competencies and learning objectives that could apply to different kinds of colleges, the project has recruited state teams that include a range of institutions. So Minnesota's team, for example, includes the flagship University of Minnesota; an elite private liberal arts college, Carleton College; and numerous state colleges and community colleges: Alexandria State College, Bemidji State University, Minnesota State University at Moorhead, North Hennepin Community College, and South Central College."

Jaschik, S. 'Tuning' college degrees. *Inside Higher Ed*, 8 April 2009.

Additionally, it has been suggested that US education could benefit from adopting other aspects of the Bologna Process, such as a national qualifications framework and a variant of the Diploma Supplement (Adelman, 2009). However, there appears to be little appetite for such a centralised model of government regulation.