

NACIQI Subcommittee Report

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Scope of Activities

The intent of this report is to share information about current practices related to student learning standards. Only general findings are presented, not focusing on individual agencies. Although the report addresses institutional accreditation, some of the findings are likely to apply to programmatic accreditors as well.

At its July 2020 meeting, NACIQI created a subcommittee to look at the impact of changes to the 2019 handbook for accreditors related to the documentation of student achievement standards and the underlying rules adopted November 1, 2019. Specifically, 34 CFR Section 602.16(a)(1) previously required that “standards effectively address the quality of institutions or programs” but now reads “The agency’s accreditation standards must set forth clear expectations for the institutions or programs it accredits.” A revision to the handbook now emphasizes the importance of documentation, asking for (page 8) “Citation for pages within the agency’s standards and policies manual(s) that describe the standards set by the agency for measuring student achievement. These pages must describe the way the agency evaluates adherence to those requirements and the way it enforces compliance.”

This report concerns agency standards and processes of review without commenting on the Department of Education’s recognition process. The report could be used to inform future rule-making and contextualize competency-based and/or direct assessment programs, which rely on “a measure of a student’s knowledge, skills, and abilities to provide evidence of the student’s proficiency” (see 34 CFR Section 688.10). In short, the questions of what students learn and how we know that are likely to be of increasing interest as educational modalities proliferate. We hope that the findings here help facilitate more effective practices in student learning assessment.

Since the March NACIQI meeting, the subcommittee has reviewed documents from prior applications to the Department from three institutional accreditors. We subsequently interviewed four institutional and two programmatic agencies, as well as the leadership from three learning assessment organizations.

Everyone we interviewed was gracious in making time for the subcommittee and were enthusiastic to talk about student learning. We appreciate their willingness to meet with us.

Overview of Findings

Existing statutes and regulations do not require the Department of Education or NACIQI to review an agency's student learning standards as part of its review of student achievement standards. Department-recognized accreditors are free to set their own standards in addition to those required by state and federal regulation as long as those legal requirements are met.

The four institutional accreditors reviewed by the subcommittee, covering most large institutions, have separate student achievement standards for (1) institutional-level outcomes like retention, graduation, and success after graduation and (2) learning outcome standards, which ask for demonstrations that academic programs (e.g. B.A. in History) are meeting student learning goals and/or are continually improving themselves using learning assessment data. This report focuses on the second category, the student learning standards, which, as noted, are not required for Department recognition.

The learning outcome standards we reviewed include common elements, and in the most articulated version entail (1) listing academic program learning goals, (2) assessing goal achievement by students, (3) analyzing the resulting data, and (4) acting on such in an iterative improvement process. Institutions may be expected by the accreditor to regularly produce reports that document these elements. Accreditors seem to agree that course grades cannot be used as a sole means to improve teaching and learning, so the learning standards typically require the creation of a parallel system to define the curriculum and collect information ("measure learning"). Third-party software systems are commonly used to manage reports and data collection, although no accreditor we interviewed requires such a service, and some advocated against their use.

We concluded that accreditors are genuinely interested in promoting and demonstrating student learning at member institutions, and that the student learning standards and peer reviews serve to focus institutional efforts on student learning. As a result of years of application of these standards, there is undoubtedly more attention being paid to program goals, curricular coherence, and the importance of faculty development in these areas.

Most student learning standards we reviewed are written in general language that would allow for institutional flexibility, for example to analyze course grades to understand the curriculum. It seems that in some cases there are requirements beyond the written standards that are enforced in peer reviews that limit the practical application of the standards. The committee saw some evidence that peer reviews can be too confining, and may sometimes inhibit useful innovation by institutions. As examples,

- reviewer expectations for student learning reports may not align with institutional mission and culture, and institutions may feel compelled to use methods they don't find useful,
- extra grading, data curation, and report-writing can add significantly to an institution's administrative load, often requiring extra staff, budget increases, and time commitments

by faculty and administrators, and

- the expectations of some peer reviewers to see “measurement of learning” is not always realistic given the difficulty of this task, the small enrollments in many programs, and a lack of expertise in educational measurement methods.

These challenges to institutional accreditation were evident in the review documentation and confirmed in interviews with agencies and higher education associations. A number of academic publications critique the methods and effectiveness of student learning reporting as it is typically done for accreditation. See the separate appendix for selected citations.

The assessment leaders in higher education we interviewed suggested similarly that too much standardization (e.g. requiring unit reporting of a particular type and restrictions on allowable data sources), may inhibit meaningful institutional assessment of student learning.

Conclusions and Recommendations

The subcommittee found that the nature and scope of reporting expectations from accreditors and peer reviewers as understood by accredited institutions may inhibit the development of research and innovation on student learning. Some of the accreditors with whom the subcommittee met attributed compliance problems to a lack of institutional commitment or effectiveness rather than issues with requirements. All of the accreditors were engaged in ongoing programming to support compliance with student learning standards.

While learning standards are not included as an area under the Department’s recognition review, the subcommittee’s findings suggest that accreditors and institutions should consider improving student learning assessments so that they (1) are less complicated, expensive and time-consuming, (2) pay more attention to data quality and quantity and sophistication of analysis, (3) allow more customization to institutional mission and culture, (4) permit innovations in measuring student learning, and (5) do not allow peer reviewers to add requirements.

Allowing institutions to combine efforts to simultaneously understand course completion, retention, and graduation with student learning may create efficiencies for both efforts (which are largely separated in the standards we reviewed) and naturally allow for deeper understanding of how learning and completion are related.

Some accreditors suggested that NACIQI could help them by allowing for the flexibility to innovate. The Department may find it useful to clarify to accreditors that learning measures are not a requirement for recognition.

Limitations

The review documentation was taken from applications to the Department of Education for recognition, and probably does not represent a random sample. For example, agencies may

select examples of institutional applications that are problematic so that they can document a rigorous review process. Similarly, although the organizations the subcommittee interviewed were generous with their time and eager to discuss these matters, the topic of learning assessment is so broad that this report cannot be considered comprehensive or definitive.