

Testimony to the National Commission on Accountability in Higher
Education

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Submitted by Jane V. Wellman
Senior Associate
The Institute for Higher Education Policy

On Behalf of the Business-Higher Education Forum Initiative on Public
Accountability for Student Learning in Higher Education

Mr. Chairman and members of the SHEEO Accountability Commission, I am pleased to submit this testimony on behalf of the Business-Higher Education Forum (BHEF) initiative on Public Accountability for Student Learning in Higher Education. The Forum is a national membership organization of Chief Executive Officers from both the business and higher education sectors. Its report, *Public Accountability for Student Learning in Higher Education*, was issued last month following over a year of dialogue and study on the topic. Copies have been made available to all members of this Commission. Rather than reiterate all of that report, let me underscore some of its core messages, before turning to a discussion of next steps.

Focus: The Forum's focus has been on public accountability for student learning in higher education, which it defines as the national capacity to measure and publicly account for the general knowledge and skill levels that students obtain from higher education. The report does *not* dwell on other aspects of the general topic of public accountability for higher education, such as measures of institutional efficiency in use of resources, access, affordability, or persistence. Accountability for student learning is just a slice of the larger topic of public accountability for higher education, but in the opinion of the Forum the one most in need of fresh thinking. But they would concede that it is not the whole topic.

The Problem: The public policy problem that motivated the Forum's interest in this topic is the national imperative to protect access and quality in higher education despite funding shortfalls and unprecedented levels of student enrollment demand. The Forum believes that this nation has to find strategies to close achievement gaps between economic and racial subgroups if we are to grow the educated workforce needed to sustain economic productivity in an international economy. Our country is no longer the international leader in this arena; we are falling dangerously behind other countries. Closing achievement gaps will require policies that encourage real institutional productivity in higher education – a tall order for an industry that has historically responded to funding shortfalls by reducing access, or cutting quality, or both. Institutional leaders and public policy makers need to be able to look at aggregate

measures of student learning, and monitor changes over time, to sustain focus on this agenda.

The Forum believes that new tools are needed to produce public evidence about student learning in higher education. Although we have a system that makes substantial investments in different types of institutional and student assessments, collectively we do a poor job of connecting assessments of learning with public information about learning in relation to goals. Most of the attention to accountability in higher education is institutionally defined and designed to measure learning as a tool for institutional improvement. The information is not translated to the public, and lacks context from comparative data about other institutions or from national measures of expected outcomes. In the view of the Forum, public accountability cannot be achieved when the learning assessment is so self-referential.

However, there is a lack of consensus within higher education and in government about what constitutes an appropriate accountability model for higher education. The default model for educational accountability is the K-12 approach, which connects individual student assessment with common measures of institutional performance. The diversity of colleges and universities, however, prevents this from becoming a workable model for higher education. And the K-12 discussion has substituted debates about assessments and instruments for what the Forum believes is the more important topic, which is clarity about institutional, state and national goals for learning outcomes.

And finally, aggregate measures of student learning remain disconnected from public policy decisions concerning allocation of resources at the state and federal levels. Neither state nor institutional decision makers can look at broad cross-sector trends to understand the consequences of changed resources on student learning. This information will be vital to public policy decision making about how to invest scarce tax subsidies in pursuit of broad social and economic goals in higher education.

Recommendations: It is the Forum's judgment that these gaps cannot be solved entirely by improving communication about what is already in place. They believe it is

time for higher education leaders to recognize this and take a proactive, constructive stance toward public accountability for student learning. This is not a short-term political problem that will blow away.

To solve the problem of incomplete public measures of student learning while preserving the strengths of the existing system, coordinated strategies are needed, beginning with the individual institution, and extending to states, accrediting agencies and to the national level. These must be grounded in a shared vision of how they fit into a larger structure of public accountability for student learning, based on some broadly shared values about purpose, audience and priority. The Forum is very opposed to simplistic, top-down solutions, which substitute standard assessments for serious attention to learning goals and expected results.

This paper stops short of specific recommendations about how this might work. The Forum does, however, offer some design principles, which could form the basis for a national consensus about a new, constructive framework for accountability in postsecondary education. These are:

1) Purpose and Need. Better tools for public accountability are needed to improve performance in teaching and learning across all of higher education, and to ensure public trust in the institutions of higher education.

2) Language. Assessment and accountability are not synonymous. Assessment is analysis of data for the purpose of institutional improvement. Accountability is the public communication about different dimensions of performance, geared to general audiences, and framed in the context of goals and standards. Public accountability systems support and are built upon effective institutional level assessment and accountability structures, but they are not substitutes for them. This is a key distinction between the accountability model in K-12, which uses assessment as the basis for accountability. Without debating the merits of this approach in K-12, the Forum has concluded that this model is not feasible in our system of higher education.

3) Differentiation and complementarity of roles. There are multiple actors involved in accountability for quality in higher education. Each entity should do what it does best and with the greatest legitimacy. Duplication of effort should be avoided.

The institutional role. Each college and university should be able to define its expectations for student learning, and to provide evidence about its success in meeting these goals in broadly understandable terms. Individual institutional governing boards, working with faculty, students and other stakeholders, need to be part of this discussion.

The state role. State governments should build accountability structures that distinguish between aggregate statewide and institutional performance. The primary audiences for statewide data are state public policy makers, who need to be able to assess broad progress toward well-defined state goals. They should pay particular attention to student flow across institutions, including transitions from high school to college, student transfer, and patterns for returning adult student enrollment and graduation. States should structure accountability systems such that institutions bear the primary responsibility for institutional accountability, including setting goals and documenting outcomes for student learning.

Regional accreditation. Regional accreditation plays a key role as the bridge between individual institutional assessment and public accountability for quality. Accreditation is already regulated by the federal government, and is a likely target for even more government intervention as part of the reauthorization of the Higher Education Act. The potential exists in this process for the government to move beyond requiring public disclosure, to dictating the terms under which disclosure must take place. Unless done very carefully, this could become a vehicle for federal intrusion into academic policy, including admissions, curriculum, and graduation standards. To maintain appropriate independence from government, accreditors need to anticipate ways to improve public communication about their standards and expectations for learning, including

broad learning outcomes expected at the baccalaureate and associate degree levels.

The federal government. The federal government has two roles to play in this agenda.

The first and most important is to maintain its historic focus on educational equity and economic opportunity in higher education. The nation's commitment to higher educational access for all students, regardless of their economic circumstances, has never been more important. But the federal role in research and data collection is also central to this agenda. Improvements in federal data collection and research have helped to shed light on broad patterns of student flow between institutions and across states. The federal government needs to continue to lead developments in data collection to track student flow across institutions.

National research. Better data about student learning is needed, and a national research agenda needs to be engaged toward that end. The nation needs the equivalent of clinical trial research on student learning in higher education – independent from inappropriate intrusion from governmental, institutional, or other interests. That will require a much more sustained, focused and disciplined investment than is now being made in comprehensive longitudinal research using a variety of measures of learning.

Next Steps: The Forum is committed to staying involved with this issue, in pursuit of greater consensus about collaborative strategies to address this issue. This is a complicated national issue, with dimensions at the federal, state, national and institutional levels. Traditional public policy capacities are not well organized to work in that arena, and the Forum believes new structures are needed to push it forward. Toward that end, the Forum has been successful in obtaining approval from the Johnson Foundation for a conference on this topic to be held this fall at the Wingspread Conference Center. Their plan is to invite a few people from the key interest areas involved with this issue, including representatives from K-12 and the business communities, to see what level of consensus we can find about problem and solution. Representatives from SHEEO, as well as from the National Governors' Association, will be invited to join us. Their hope

is that participants can emerge from that discussion with a better shared understanding of first principles they can take back to our constituent organizations, to serve as a basis for moving forward.