**Important!** Discussions in Washington D. C. could change what and how you teach.

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**Washington and Assessment:**

It Could Get Worse, Much Worse

Editor’s Note: You may or may not be aware of U.S. Secretary of Education Margaret Spellings efforts to transform higher education accreditation. In recent months, Spellings and members of the Spellings Commission have hinted at greater standardization, more assessment (but for accountability, not program improvement), and more comparisons of institutional performance.

Following are a series of excerpts from recent articles appearing in Inside Higher Education. Together these excerpts tell the story of how higher education accreditation (and especially expectations regarding assessment of student learning) is being altered by ongoing deliberations and actions taken in our nation’s capitol.

Like me, you may be struck by the scope and pace of these developments. Of particular concern are the following 1) the apparent shift from a program improvement assessment philosophy to assessment for accountability, 2) the potential for misleading comparisons across varied types of higher education institutions, and 3) the suggested use of standardized tests as measures of institutional effectiveness. Implications for St. Norbert College will be elaborated following these excerpts. We invite you to react to these developments and, with your permission, will publish your thoughts next Fall.

**Nov. 15**

First on the Docket: Accreditation

Those who have been following the work of the Secretary of Education’s Commission on the Future of Higher Education – be it with excitement or, more commonly in higher education, trepidation—might be forgiven for feeling either forlorn or relieved at how little has been said and done about the panel’s agenda since the commission formally completed its work in August. After nearly a year of meetings, reports and occasional high drama, the aftermath of the panel’s report has unfolded largely in a vacuum.

The November 29 forum in Washington, to which the department has invited several dozen college officials and experts (and quite consciously not invited others, though the meeting is open to the public), is designed to identify strategies on how the accreditation community and its stakeholders can implement the commission’s recommendations, according to the agenda.

Accreditation, the system that higher education uses to regulate itself, took a pounding in one of the “issue papers” that the commission’s chairman, Charles Miller, solicited early in the panel’s work. The paper, which essentially called for junking the current system and replacing it with a “national accreditation framework,” was panned even by accreditation’s many critics— as too harsh and extreme.

And while the language the commission used concerning accreditation softened over the course of its deliberations, its final report still embraced the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view that accreditation too often impedes the view.

The panel’s core recommendation to fix those perceived problems was summed up in one, long paragraph:

“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 for comparisons among institutions regarding learning outcomes and other performance

(Continued on Page 2)
Can You Say NACIQI?

In the alphabet soup of acronyms of Washington higher education, most people could probably go a long time before running across—or caring about—the federal panel known as NACIQI. But while the National Advisory Committee on Institutional Quality and Integrity is probably not poised to become a household name in the faculty lounge or the campus dining hall, it is clear that the profile of the panel that advises the U.S. education secretary on accreditation is about to enjoy one of its periodic moments of greater visibility.

The advisory panel is charged, among other things, with recognizing the authority of individual accrediting agencies to operate, and therein lies its power: Without the approval of NACIQI, an accreditors stamp of approval of a college does not carry with it the all-important right for the institution’s students to receive federal financial aid.

Spellings sees the panel as one way the Education Department might be able to carry out its effort to compel colleges and universities to collect and report better data without the need for new laws or federal rules.

The advisory committee had already been pushing in the direction of more accountability for learning outcomes over the last year or two, but Monday’s meeting of the panel offered several signs that that trend may be accelerating. Perhaps more importantly, some of the reports the panel’s staff prepared for this week’s meeting were perceived as pushing accreditors harder and further on measuring learning outcomes than they have been pushed before.

Feeling the Winds from Washington

The 600 academic administrators and professors who gathered in Philadelphia last week for the annual meeting of the Middle States Commission on Higher Education are on the front lines of accreditation. They’re the ones who lead self-studies of their own colleges or participate on visiting teams that review other institutions. They are charged with ensuring that their campuses are fulfilling their missions of educating students, of enticing or prodding occasionally recalcitrant faculty members to measure their effectiveness and change their ways if they come up short.

Although the commission abandoned many of the hardest words and radical ideas that had been bandied about during its deliberations—including the possibility of replacing the current system with a national (read: federal) framework—its final report still offered a highly critical view of accreditation. Accreditors and higher education officials, the commission concluded, have done far too little to figure out whether college students are coming out of their institutions with the skills they need to be productive workers and citizens.

The college officials, almost to a one, also said they worried that the commission’s and the Education Department push for colleges to use common indicators that might allow a consumer to more easily compare one against another would, almost inevitably, result in oversimplification. And many of them expressed fears that the department would, as it signaled at meetings of a panel that advises it on accreditation last week, start asking accreditors to set minimum standards for colleges to meet, a role most of them see as inappropriate.

…”Charles R. Nunley, the president of Montgomery College, who was among the commission members who helped transform its written report from one focused primarily on accountability and transparency to one that equally emphasizes student access and expanding financial aid.

Nunley acknowledged that some members of the Spellings panel, particularly those representing corporations and the public, “don’t really understand where you are and what you’ve done, and that it’s far ahead of where they “think you are.” She noted that despite the early saber rattling about moving to a federal system of accreditation, the commission’s final report did not dictate excessively to higher education. “It did not recommend federalization of accreditation of higher education” and “did not recommend a single standardized test or even a set of tests,” she said.

But that does not, she said, suggest that colleges can afford to do nothing to better measure and report their successes and failures in educating students. “How many of you would say your institutions are doing enough in terms of measuring student learning outcomes?” she asked the college presidents, administrators and professors in the audience. A small scattering of hands, perhaps 25 among the 500 people in the room, went up. “I couldn’t raise my hand either—I admire your honesty,” Nunley said. When we are honest with ourselves as college leaders, there is not nearly enough happening on our campuses.”

The key going forward, she said, is that “if we in higher education take leadership, we have a chance of making sure that these standards recognize the differences in our institutions,” rather than having oversimplified, inappropriate measures “imposed on us.”

--Doug Lederman

The original story and user comments can be viewed online at http://insidehighered.com/news/2006/12/11/accredit. (Continued on Page 3)
Washington and Assessment: It Could Get Worse, Much Worse (Continued from Page 2)

**Jan. 17**

Another Front on Accreditation

After months of uncertainty, the U.S. Education Department has decided to begin a process next month in which it will explore possible changes in the federal rules that govern the higher accreditation process, department officials confirmed Wednesday.

At various points in the last few months, department officials have sent conflicting signals about whether they would proceed on that course, amid doubts from higher education officials about whether such a process is necessary or wise.

But in meetings with accreditors in recent days, and in an interview on Tuesday, Vickie L. Schray, a Spellings aide who was deputy director of the secretary’s commission, said that department officials had concluded that they should not wait to revisit the rules surrounding accreditation.

Accrediting association leaders have been particularly upset about the aggressive tack the department has taken through the process by which it recognizes the right of accreditors to operate, arguing that department officials have essentially used that process to make changes informally, “through the back door,” as more than one has described it.

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--Doug Lederman

**Jan. 31**

Accountability and Comparability

Accrediting officials have heard the message ad nauseam. Policy makers and the public need more evidence that colleges are educating their students, and it’s up to higher education—accreditors included—to produce that evidence. The argument was made for the umpteenth time Tuesday at the annual meeting of the Council for Higher Education Accreditation, by a panel of higher education researchers and experts on assessment.

The audience of college officials and accreditors suggested that at this point, outright opposition seems to have morphed into resignation, and even partial embrace.

But it was equally clear that while they generally accept the idea that colleges must prove that they are educating their students, they have serious problems with the underlying premise that the only truly useful ways of measuring student learning outcomes are those that allow for comparing a college against its peers.

Such measures often result in over implication and fail to account for differences between institutions, they argued.

The current push for accountability, which has intensified in the wake of the report last fall of the Secretary of Education’s Commission on the Future of Higher Education, has embraced the notion that students and families, prospective employers and the public demand methods of comparing one college’s performance against another.

There’s no way to take a campus-based report and say, “We’re doing well or we’re not doing well,” Miller said. “The answer to the question, ‘How well are we doing?’ really depends on an answer to a prior question: Compared to what? Compared to whom?”

She noted that most faculty members and college leaders seem to have no problem using standardized tests to judge the quality of their student applicants, but that they have “been reluctant to use standardized measures to say something about the quality of their own work.”

The time in which higher education officials can respond to calls for accountability by ducking their heads and hoping the calls go away has past, Miller said, given the intensifying pressure and threats of government intervention.

We have to pay attention to this message, because it has been consistent and it has been long term and it is getting louder,” Miller said. “If we can … look at ourselves carefully and rigorously, I think there’s a very good chance that we will be able to control the terms in which this question is answered. If we can keep this question within our own control, we will do something that K-12 was unable to do, to everybody’s great sadness.”

Peter T. Ewell, vice president at the National Center for Higher Education Management Systems said he feared that the more that colleges (or associations or accreditors) focus on coming up with standardized ways to measure one institution’s performance against others, the less energy and inclination they’ll have to find other, perhaps better methods of assessing themselves for self-improvement purposes.

--Doug Lederman and Elizabeth Redden

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/01/31/compare

**Feb. 2**

Texans and Their Tests

When the Education Secretary’s Commission on the Future of Higher Education started meeting, many professors and college leaders feared it would push for some sort of mandatory standardized testing of graduating college seniors—a prospect they saw as inconsistent with the values of liberal education. In the end, the Spellings Commission didn’t make such a recommendation. But in Texas—home to the education secretary and the panel’s chair—mandatory standardized testing for graduating seniors may now be on the way.

Texas Gov. Rick Perry, a Republican, on Thursday proposed a major expansion of state support for public higher education and for student aid. He also proposed one of the broadest testing requirements for graduating college students to date. (In Texas) Seniors would be required to take either licensure exams in their fields or Education Testing Service exams for various college majors. While students would not be required to pass the exam to graduate, colleges’ state funds would be linked to students’ scores, so institutions where many students did well on the standardized exams would get more money.

--Scott Jaschik

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/02/02/texas (Continued on Page 4)
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**Feb. 19**

Huge IPEDS Lives

The U.S. Education Department is quietly moving ahead with plans to significantly expand the information and data it collects from colleges each year through an online survey – including an entirely new section that would require institutions to report on the accountability measures they use and their scores on those tests or tools.

The proposal appears to be another prong in the department’s multi-faceted campaign to carry out the recommendations of Education Secretary Margaret Spellings’ Commission on the Future of Higher Education. By proposing this expansion of what it collects through the Integrated Postsecondary Education Data System (IPEDS), the department could go a long way (without potentially controversial legislation or regulatory changes) toward achieving its goal of establishing a federal system for reporting student learning outcomes and other information on colleges’ performance, as called for in the final report of Spellings Commission.

The department’s announcement says that most of the new information it is seeking to collect would be added to the department’s existing Web site for college information, the College Opportunities Online Locator.

Under the “new accountability part,” colleges would be asked a set of four questions. Some are straightforward; the department asks if institutions have online “fact books” and if they post information on their Web sites about assessment or student learning outcomes, and requests links to those pages, which the department says it would add to the Web-based College Opportunities Online Locator.

--Doug Lederman

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/02/19/ipeds

**March 27**

Pushback Against Perceived Power Grab

The U.S. Education Department sent its recommendations for changing federal accrediting rules around to the negotiators late last week, several days past the department’s self-imposed deadline for providing the information.

When the proposed rule making language did appear, it contained several provisions that would, if etched into federal regulation, give the Education Department significantly greater authority in monitoring accreditors, and give accrediting agencies much more say over the institutions they accredit.

Among other changes, the department’s proposed regulatory language would:

- Give accreditors three options for measuring institutions’ success in educating students—two of which would force them to set minimal levels of acceptable perform-

- ance, which regional accreditors (and many college officials) have traditionally considered it inappropriate for them to do.

- Require accrediting bodies to require the programs, colleges and universities they oversee to “publish information related to the program’s or institution’s effectiveness in fulfilling program objectives and institutional mission, especially indicators of the program’s or institution’s performance regarding student outcomes.” And accreditors themselves, the department adds, must publish information about the standards to which they hold colleges accountable, and that information “must explicitly describe the agency’s expectation of performance in relation to each standard.”

--Doug Lederman

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/03/27/accredit

**March 28**

Drawing A Hard Line

A group of accrediting agency officials and others drafted an alternative to proposed regulatory language unveiled late last week in which Education Department officials sought to give accreditors three options for measuring institutions’ success in educating students.

The accrediting officials and others who proposed the alternative did so without much enthusiasm, and only after the department’s lead negotiator, Vickie L. Schray, had laid down the law in the day’s first exchange. Steven D. Crow, executive director of the Higher Learning Commission of the North Central Association of Colleges and Schools, had opened Tuesday’s proceedings by complaining that department officials had “edited the text” of the Higher Education Act to give themselves the latitude to dictate how accreditors measure colleges’ learning outcomes.

“This is taking what was a government requirement in law that we have a standard that addresses student achievement, and now you’re saying, not only does it have to look this way, but it has to dance this way and act this way,” Crow said. “We’ve essentially lost control of our ability to set standards and our ability to implement those standards. I don’t want to argue here that what you’re after is not appropriate. I’m arguing that how you’re doing it is really threatening to me and my organization.

Schray held her ground. The problem with the current system, she said, was that the current approach lets every institution measure and report their achievement in educating students in different ways, and the accreditors do not make judgments about whether the level of learning that is occurring is sufficient. The information produced is so diverse as to be “meaningless” to “folks on the outside,” Schray said.

When the accreditors offered their alternative, they pressed Schray for the department’s reaction to it. After expressing the department’s “gratitude and appreciation for your willingness (Continued on Page 5)
Office of Institutional Effectiveness

Washington and Assessment: It Could Get Worse, Much Worse (Continued from Page 4)

and tenacity in working through this issue,” she essentially told them that what they viewed as the proposal’s main virtue—that it would take the accrediting agencies out of the role of telling institutions whether their student outcomes were sufficient—was a big problem for the department.

“What appears to be missing” in the alternative proposal, Schray said, is the (accrediting) agency’s responsibility in the review and approval affirmatively of what they institutions are proposing.” Without that, she suggested, the alternative won’t fly.

But the department’s hard line on learning outcomes hung over the proceedings. After the panel formally wrapped up work for the evening, a small subgroup of accrediting and college officials sat around the conference table discussing their options given that their proposed alternative seemed like a non-starter. The mood was not an upbeat one.

—Doug Lederman

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/03/28/accredit.

**March 29**

Explaining the Accreditation Debate

Given the apparent lack of progress and the score of 3 out of 10 on artistic merit, it would be easy to write off what happened during the three days as a waste of time, and to move on to the next article (you and me both).

But appearances aside, what unfolded during the second of three meetings of the Education Department’s rule making committee does matter, or at least could matter, to professors, college administrators and anyone with more than a passing interest in higher education.

It matters, at the very least, for what it reveals about the goals of this Education Department, about why accreditation has become the primary battlefield in the aftermath of Education Secretary Margaret Spelling’s Commission on the Future of Higher Education, and about the argument over what “quality” means in higher education.

The federal rule making process on accreditation is a central part of the Education Department’s strategy for carrying out the recommendations of the Spellings Commission, especially its core conclusion that colleges and universities need to do a much better job measuring and proving that they are successfully educating their students.

Education Department officials, who know that they have a 20-month time span (and almost inarguably a narrower window of meaningful power) in which to make changes before a new administration takes over, decided early on that accreditation was their best option for having the most impact, and fast.

That’s (1) because the department already directly regulates accrediting agencies (through a process of recognition in which accreditors must prove that they are upholding their standards); (2) because the agencies, through their own processes for approving institutions or programs, monitor most colleges and universities in the country, so getting the accreditors to change their standards and behavior can indirectly influence what happens on most campuses.

And (3) because the department believes it can change its rules for accreditors without seeking Congress’s approval, which would add many potential layers of complication and potential opposition, especially now with an opposition party in control. With that in mind, the department announced last fall that it would empanel a committee of negotiators—accreditors, state officials, public university leaders and its own staff members—to contemplate possible changes in the federal rules that govern accreditation.

Department officials said during this week’s session that they would return with new regulatory language at their negotiating committee’s three rule making sessions (April 24-26) with the goal of having new federal rules approved by November to take effect in July 2008—just a few months before the election that will formally end the Bush presidency and the current Education Department’s time in office.

What happens between now and then is likely to depend very little, if at all, on what college leaders or accreditors say; department officials have duly noted their objections for months now and pursued their current course undeterred.

Perhaps the only potential impediment to the department’s fairly significant transformation of accreditation and, in turn, how colleges are held accountable by accrediting agencies for measuring and reporting student learning lies a few blocks away from the Education Department’s Washington office—on Capitol Hill.

Members of Congress have signaled that they are watching the department’s moves on accreditation and the Spellings Commission’s agenda closely, and warned department leaders not to overstep their bounds. There may be no more important consumers of the department’s ultimate language on accreditation rules than the men and women who work in the offices of Sen. Edward M. Kennedy (D-Mass) and Michael B. Enzi (R-Wyo.) and Reps. George Miller (D-Calif) and Howard P. (Buck) McKeon (R-Calif.) who lead their parties on the Senate and House education committees.

Both panels have vowed to draft legislation to renew the Higher Education Act this calendar year, and they could do much to support—or scuttle—what the department is trying to do.

—Doug Lederman

The original story and user comments can be viewed online at http://insidehighered.com/news/2007/03/29/accredit.

(Continued on Page 6)
Implications for St. Norbert College

Regional accreditation agencies are being criticized in Washington for lacking uniform standards, placing too little emphasis on assessment of student learning, and making it difficult to compare institutions. Colleges and Universities (including St. Norbert College) can help our accrediting bodies stem the tide of increased federal regulation by taking current accreditation requirements more seriously. More and better examples of comprehensive assessment efforts focused on program improvement would allow the Higher Learning Commission (and the other regional agencies) to argue that systematic assessment of student learning is already occurring, that locally developed systems better reflect wide variations in institutional mission, delivery systems, and student populations, and that program improvement rather than institutional comparison should remain the primary goal of student learning assessment.

At St. Norbert College, this means

- building on our Focused Visit success
- maintaining our momentum by committing to a 2 1/2 year cycle of data collection, analysis, and program improvement (closing the loop)
- updating and improving program assessment plans as needed
- developing additional measures that reflect our unique mission and intended learning outcomes
- documenting our successes facilitating student learning

If you wish to express your views about the Department of Education’s efforts to change higher education accreditation to our elected representatives, you may contact them at:

Feingold, Russell D.  (D-WI)
506 HART SENATE OFFICE BUILDING
WASHINGTON DC 20510
(202) 224-5323
Web Form: feingold.senate.gov/contact_opinion.html

Kohl, Herb  (D-WI)
330 HART SENATE OFFICE BUILDING
WASHINGTON DC 20510
(202) 224-2563
Web Form: kohl.senate.gov/gen_contact.html

Write to Representative Steve Kagen
1232 Longworth HOB
Washington DC 20515
(202) 225-5665 (phone)
(202) 225-5729 (fax)

Satisfaction with St. Norbert
SNC Graduates (2000-06) Speak

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