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**Statement to the
National Advisory Committee on Institutional Quality and Integrity**
Panel: Regulatory Burden & Data Needs

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Given the breadth of the potential topics contained within the issue of regulatory burden and data needs, my comments will focus on the measurement, reporting, and use of student learning outcomes data. The effective and appropriate assessment of student learning is a topic of utmost importance for postsecondary institutions, accreditors, the Education Department, and the NACIQI committee.

As some of you may remember from my remarks in February, I manage the Voluntary System of Accountability on behalf of the Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU) and over 320 public institutions.

As a brief recap - the VSA was created in 2007 through the joint work of leaders from APLU, AASCU, and our member colleges and universities.

The VSA effort has three primary objectives.

- To provide a college search tool for students, families, and high school counselors by presenting clear, accessible, and comparable information on the undergraduate student experience through the College Portrait website www.collegeportraits.org.
- To provide a mechanism for public institutions to demonstrate accountability and transparency, particularly in the areas of access, cost, student progress, and student outcomes.

- o To support institutions in the measurement of student learning outcomes through research and by providing a forum for collaboration and exchange.

A central component of the VSA is the four-year pilot project to measure and report student learning outcomes in a common and comparable way. From that experience, I will briefly share some key lessons we have learned, ongoing challenges, and observations about the future of learning outcomes assessment.

First, it is important to recognize there are three essential and discrete elements of student learning outcomes assessment: measurement, reporting, and use.

Second, it is important to understand the different purposes for collecting learning outcomes data. Generally the reasons fall into two broad categories: 1) formative assessment (institutional improvement) and 2) summative assessment (accountability). Although there is significant overlap between the two reasons for gathering learning outcomes data, the purposes are distinct. And each purpose can and should inform the choice of measurement, reporting, and use of assessment data.

To illustrate the first two points, a primary purpose of reporting student learning outcomes on the VSA/College Portrait is accountability and the ability to compare across institutions (summative assessment).

In terms of *measurement*, VSA participating institutions use one of three standard instruments and a common methodology. The results are *publically reported* on the College Portrait. And the results can be *used* by several different audiences: e.g., students and families for selecting a college, state legislators for accountability reporting, and institutions for benchmarking with peers.

If a VSA institution would like to use results from one of the standard instruments for more formative purposes – to improve learning in a particular program – the institution will typically combine the test results with *other types of assessment measures* such as student survey data, electronic portfolio data, program review results, etc. to better understand and disaggregate the test results. The combination of results from the different measures can then be *reported and discussed* across campus to determine appropriate interventions or strategies to improve learning outcomes in a particular program.

This illustration points out a third lesson. There are different levels of assessment: institution, discipline, program, and course levels. The VSA focuses on institution level assessment, which is valuable for summative accountability purposes. Individual institutions also collect data to document student learning through professional accreditation, program review, and general education evaluation. For assessment work to have a meaningful effect, outcomes data should

be collected across levels, through a variety of methodologies and instruments, and be combined to paint a comprehensive picture.

A fourth lesson is that context matters. Size of the institution, age of the institution, characteristics of the students, institutional mission, and instructional delivery model are examples of key factors for selecting the appropriate combination of assessment approaches.

The challenge that arises from all of these lessons is that the effective assessment of student learning is complex and multifaceted. A top-down approach that imposes a one-size-fits-all instrument or method will be counterproductive for both purposes of student outcomes assessment: a) the accurate documentation of student learning for accountability and transparency purposes and b) the application of useful information to enhance student learning and improve institutional performance.

Another challenge is that student learning assessment is an evolving and dynamic field. Methodologies and systems are struggling to keep pace with increasing external demands for evidence, new educational delivery methods, and shifting student and institutional characteristics.

The lessons and challenges learned from our experiences with the VSA lead me to the conclusion that regulation or enforcement of common standards at the federal level is a mistake. I am convinced that the process must be owned by the higher education community in partnership with accreditors. In this way, flexibility is built into the system and the system can evolve as new methods and techniques are tested and refined. It should not (literally) take an act of Congress to implement new, more innovative techniques.

We have evidence that such a flexible, voluntary system can work. Four years ago, the VSA was created in response to the desire for more understandable and transparent data. The project is now getting ready to enter its next phase of development in light of the lessons I just described to you.

This fall, we will evaluate the effectiveness and the value of the VSA approach to measuring and reporting student learning outcomes for our various target audiences, including accreditors, institutions, policy-makers, and students/families. As we did at its inception, we will convene a group of assessment, data, and policy experts as well as senior university leaders to review the evaluation results, examine alternative assessment models, and make recommendations for the future directions of the project. In the next year, you will see a new and improved version of the VSA in response to the changing needs for different types of accountability data.

And the VSA is not the only such model. The American Association of Community Colleges (AACC) is working with their members institutions to develop a Voluntary Framework of

Accountability or VFA. The project is currently in the pilot stage and includes appropriate student outcomes measures for the two-year college sector. Institutions with adult and online degree programs have developed the Transparency by Design program. It includes the public reporting of student learning outcomes at the program level – again focusing on outcomes most appropriate for its participating schools.

I urge the committee to support broader recognition within the accreditation process of the contribution of accountability systems already in place. It is right and proper to more broadly recognize the high level of commitment by institutions participating in these systems to greater transparency in reporting outcomes and to improving student learning on campus.

Thank you for the opportunity to provide comments. I look forward to your questions and further discussion.