



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

December 14, 2009

Control Number
ED-OIG/I13J0005

Dr. Elizabeth H. Sibolski
President
Middle States Commission on Higher Education
3624 Market Street
Philadelphia, PA 19104

Dear Dr. Sibolski:

This final management information report, entitled *Review of the Middle States Commission on Higher Education's Standards for Program Length*, presents the results of our inspection.

The objectives of this inspection were to determine: (1) what guidance Middle States provides to institutions regarding program length and credit hours, (2) what guidance Middle States provides to peer reviewers to assess program length and credit hours when evaluating institutions, and (3) what documentation Middle States maintains to demonstrate how it evaluates institutions' program length and credit hours. We found that Middle States does not have minimum requirements specific to program length and does not have minimum requirements for the assignment of credit hours. The lack of requirements could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of Title IV funds.

BACKGROUND

Accrediting agencies are private educational associations that develop evaluation criteria and conduct peer evaluations of institutions of higher education to ensure that the education provided by those institutions meets acceptable levels of quality. The U.S. Department of Education does not determine the quality of education funded by Federal education dollars; however, the Secretary recognizes accrediting agencies to serve as reliable authorities for the quality of education.

In 2008, there were 7 regional accrediting agencies that accredited 2,897 institutions of higher education. These institutions received \$74.8 billion in Title IV funding.¹ The Middle States Commission on Higher Education accredits institutions in Delaware, the District of Columbia,

¹ Title IV funding is federal student financial aid provided through the Federal Stafford Loan, the PLUS Loan, the Federal Perkins Loan, the Federal Pell Grant, the Academic Competitiveness Grant, the National Science & Mathematics Access to Retain Talent Grant, the Federal Supplemental Educational Opportunity Grant, and Federal Work Study programs.

Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands. Institutions accredited by Middle States received \$14 billion of the \$74.8 billion in Title IV funding in 2008.

Middle States has 10 requirements for affiliation that are required for an institution to be eligible for candidacy status, initial accreditation, or reaffirmation of accreditation. Prior to membership and accreditation by Middle States, an institution enters a candidacy phase that can last up to five years. Middle States has 14 standards in addition to the 10 requirements for affiliation that its institutions must meet prior to initial accreditation or reaffirmation of accreditation; seven focus on institutional context and seven focus on educational effectiveness. Middle States reviews institutions' compliance with the 14 standards through decennial accreditation reviews and other periodic on-site evaluations and reports. Between the 2003-04 and 2007-08 academic years, Middle States conducted 283 decennial accreditation review site visits.

REVIEW RESULTS

The objectives of this inspection were to determine:

- (1) What guidance Middle States provides to institutions regarding program length and credit hours,
- (2) What guidance Middle States provides to peer reviewers to assess program length and credit hours when evaluating institutions, and
- (3) What documentation Middle States maintains to demonstrate how it evaluates institutions' program length and credit hours.

Section 496(a)(5)(H) of the Higher Education Act, as amended, requires accrediting agencies to establish accreditation standards that assess the institution's measures of program length.

We found that Middle States does not have minimum requirements specific to program length and does not have minimum requirements for the assignment of credit hours. The lack of requirements could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of Title IV funds.

Middle States senior staff stated that their main focus was on student learning outcomes; however, we did not find that Middle States provided any guidance to institutions and peer reviewers on minimum outcome measures to ensure that courses and programs are sufficient in content and rigor.

Issue No. 1 Middle States Guidance to Institutions on Program Length and Credit Hours

We found that Middle States provides some guidance to institutions on program length and credit hours; however, it does not have minimum requirements for institutions concerning program length or the assignment of credit hours.

To be eligible for Middle States candidacy status, initial accreditation, and reaffirmation of accreditation, Middle States requires the institution to be in compliance with all applicable Federal or state government policies, regulations, and requirements. We found that Maryland, New Jersey, New York, Pennsylvania, and Puerto Rico have regulations requiring that institutions be in compliance with a state-defined credit hour. Delaware, the District of Columbia, and the Virgin Islands do not have regulations addressing requirements for credit hours (see Appendix).

The institutions in five of the six decennial accreditation reviews in our sample (see page 10) were from States with regulatory definitions of a credit hour. In one of the five reviews, we saw references to the State credit hour requirements, but there was no indication of whether or how these requirements were considered in Middle States' accreditation decisions.

Middle States' *Characteristics of Excellence in Higher Education* outlines Middle States' requirements of affiliation and standards for accreditation. Under the description for one of its standards, Middle States specifies that an accredited institution is expected to have educational offerings that are congruent with its mission, which include appropriate areas of academic study of sufficient content, breadth and length, and conducted at levels of rigor appropriate to the programs or degrees offered. Middle States, however, does not provide requirements in the standards on minimum program length or requirements specific to the assignment of credit hours.

Middle States recently published guidelines on degrees and credit hours. The guidelines, with an effective date of June 26, 2009, state that Middle States considers the assessment evidence to be the most compelling evidence that an institution's academic offerings are of appropriate academic content, breadth, length, and rigor. The guidelines provide definitions from federal sources and state that Middle States recognizes that it is appropriate for relevant government agencies to set reasonable and suitable expectations for time spent earning degrees. The guidelines state that Middle States is providing these definitions as a reminder to institutions and that they are not Middle States requirements. While Middle States provides that assessment results are the most important evidence on program length and the assignment of credit hours, it does not provide minimum requirements that institutions must meet to ensure that academic offerings are of appropriate academic content, breadth, length, and rigor.

Middle States does provide minimum requirements for the number of credit hours in general education for associate degree programs and baccalaureate programs; however, these requirements do not address the appropriateness of overall program length or the assignment of credit hours.

In an interview with Middle States senior staff, they did not disagree with our conclusion that Middle States does not provide any requirements to institutions on minimum program length and the assignment of credit hours. Middle States senior staff stated that their main focus was on student learning outcomes.

Issue No. 2 Middle States Guidance to Peer Reviewers on Program Length and Credit Hours

We found that Middle States provides some guidance to peer reviewers on program length and credit hours; however, it does not have minimum requirements for institutions concerning program length or the assignment of credit hours.

As noted above, Middle States recently published guidelines on degrees and credit hours; however, these guidelines are not Middle States requirements for institutions on minimum program length or on the assignment of credit hours.

Middle States provides instruction to peer reviewers through training presentations and manuals, including two basic training sessions for evaluators and additional intermediate training sessions on select standards. Two training items pertained to the assignment of credit hours, though neither example provided guidance to peer reviewers specific to determining the appropriateness of an institution's assignment of credit hours.

One presentation specifically addresses the assignment of credit hours for certificate programs, experiential learning, branch campuses, distance learning, and contractual relationships. The presentation presents questions that peer reviewers should ask concerning the assignment of credit hours for these types of learning; however, it does not provide guidance specific to credit hours or program length. For example, on the experiential and distance learning slides, there are questions related to academic quality and rigor, though there is no guidance on how to determine the appropriateness of an institution's assignment of credit hours.

Middle States also developed an example of an evaluation team report for one of its training sessions. This example refers to issues of assignment of credit hours for experiential and distance learning. The example does not provide guidance on how to evaluate the assignment of credit hours or program length.

The other resources primarily provided information on the procedural steps for accrediting, logistical steps for site visits, and a general overview of the responsibilities of peer reviewers.

The training materials did not reference steps that peer reviewers should take to ensure that institutions were in compliance with state credit hour requirements. The training materials also did not provide a process for how to evaluate whether a course had the appropriate rigor or length. Middle States senior staff stated that most peer reviewers are knowledgeable academicians who already have a good understanding of academic rigor and the appropriate number of credit hours. The titles of the peer reviewers used for decennial accreditations indicate that the peer reviewers come from senior positions at their home institutions.

As stated above, Middle States senior staff stated that their main focus was on student learning outcomes.

Issue No. 3 Middle States Documentation to Demonstrate Evaluation of Institutions' Program Length and Credit Hours

We found that Middle States does not maintain documentation to demonstrate how it evaluates institutions' program length and credit hours. We reviewed Middle States' accreditation documentation for:

- One institution seeking initial accreditation,
- Five institutions seeking reaccreditation,
- Three institutions with recent substantive changes to their programs, and
- Three institutions seeking candidacy for accreditation

Initial Accreditation and Reaccreditation

We reviewed Middle States' documentation for its decennial review of six institutions—one institution seeking initial accreditation and five institutions seeking reaccreditation. Middle States allows institutions seeking reaccreditation the option to submit a selected topics self-study if the institution was in good standing and there were no concerns regarding the institution's compliance with Middle States' standards. Of the five institutions seeking reaccreditation in our sample, four did a selected topics self-study. The remaining institution seeking accreditation and the institution seeking initial accreditation did a full self-study.

Middle States senior staff stated when an institution did a selected topics self-study, a team would review the institution's compliance with all the standards in a separate site visit using support provided by the institution. The supporting documentation is summarized through a "document roadmap." We could not evaluate the level of review performed by the teams for institutions with a selected topics self-study because the document roadmaps for the institutions in our sample were not available and the team reports on compliance with the standards did not reference the basis for determining compliance with the standards. Middle States senior staff stated that they have since implemented a policy to retain all document roadmaps.

Middle States also provided an example of an institution's document roadmaps. One document roadmap identified documents related to standards that were not addressed in the self-study. The other document roadmap identified the institution's documentation detailing the curriculum for specific courses. Although these roadmaps show that an institution took steps to address all of Middle States' standards, they do not document Middle States' analysis of the documentation.

The institutions in five of the six reviews were located in States with regulatory definitions of a credit hour. Although there are instances where these institutions presented information on the content and rigor of a program, we did not find that Middle States had a process for reviewing the appropriateness of the institutions' determinations. Some institutions had a process of programmatic review to evaluate rigor, but Middle States does not have a requirement for institutions to implement this type of process and has not issued guidance on what would constitute an acceptable process of programmatic review.

Substantive Changes

We reviewed five substantive change requests for new programs in three institutions. Three of the five substantive change requests were in States with regulatory definitions of a credit hour. Two of these requests reference the program approval process, with one specifically addressing the responsibility for assignment of credit hours to courses. These two programs were also being evaluated by programmatic accreditors.

The remaining two substantive change requests, both from an institution operating in Delaware, did not reference how credit hours were assigned or any process at the institution for evaluating and approving new courses and programs. Middle States denied one of the substantive change requests involving a graduate-level program because its coursework was not of sufficient content and rigor. Middle States' determination indicates that there is an acceptable minimal level of content and rigor for assigning credit hours to graduate level work; however, Middle States has not defined this level.

Candidacy

Middle States senior staff stated that they focused on program length during the institution's initial candidacy period. We reviewed Middle States' documentation for three institutions seeking candidacy. For two of the three institutions, we did not find evidence that Middle States focused on the appropriateness of program length. For all three institutions, we did not find evidence that Middle States focused on the assignment of credit hours.

Middle States' Perspective

Middle States senior staff recognized that they did not have a clearly defined definition of a credit hour, but the senior staff stated that their main focus was on student learning outcomes. The senior staff stated that regional accreditation focuses more on outcomes and evidence of competency. For example, the senior staff stated that they ensure that the makeup of the faculty is appropriate, and the faculty would in turn ensure that the curriculum is appropriate. The faculty may not need a defined process for evaluating a course, since they may discover problems concerning rigor through monitoring and informal review.

Middle States senior staff stated that they rely on the expertise of their peer reviewers. Peer reviewers look for comparable programs when evaluating accelerated programs. Middle States senior staff stated that, because accredited institutions are members of a peer organization, the perception of their own quality would be diminished if a suspect institution was accredited.

Middle States senior staff stated that the National Center for Educational Statistics (NCES) and the Integrated Postsecondary Education Data System (IPEDS) define a credit hour and stated that they believed the definitions were clear. Middle States provides the definitions to institutions as a reminder. They stated that a good starting point for a credit hour is the Carnegie definition. The senior staff stated that they believed that more disciplinary associations should focus on rigor, and detail what a course or degree would entail.

Office of Inspector General (OIG) Conclusion

Title IV funding for students is based on the number of credit hours a student takes. Middle States does not have requirements specific to program length and does not have a definition of a credit hour. Middle States senior staff stated that they focus on outcomes; however, Middle States does not have any minimum requirements for outcomes to ensure that courses and programs are sufficient in content and rigor. The lack of minimum requirements for credit hours and the assignment of credit hours could result in inflated credit hours, the improper designation of full-time student status, the over-awarding of Title IV funds, and excessive borrowing by students, especially with distance, accelerated, and other programs not delivered through the traditional classroom format.

MIDDLE STATES COMMENTS

On September 29, 2009, we provided Middle States with a copy of our draft management information report for comment. We received Middle States' comments to the report on October 28, 2009. Middle States acknowledged that the draft report accurately reflected the OIG's findings, but reiterated that it has a different philosophy with regard to the use of credit hours and program length as a measure of quality in higher education.

Middle States Comments

Middle States stated it provides information to institutions on existing Federal and State definitions and requirements with regard to credit hour, program length by degree, term length, etc. Middle States stated that the Federal definitions are very clear and state licensing requirements establish minimums in all but three of Middle States' states.

OIG Response

Middle States' degrees and credits guidelines, published June 26, 2009, includes material from three federal sources: 1) the Title IV statute and regulations; 2) the glossary of terms used by the National Center for Education Statistics for data collection and reporting in the Integrated Postsecondary Education Data System; and 3) material published by the U.S. Network for Education Information describing common practices of the U.S. system of education for international educators and students. None of these definitions and materials defines instruction or explains how to determine credit hour equivalence in programs delivered by different methods of instruction, particularly instruction that is not provided in the traditional classroom and lecture format. In states with regulatory definitions of a credit hour, the definitions of a credit hour are similarly limited. Therefore, Middle States cannot rely on federal and state laws, regulations, and other materials mentioned in its guidelines to meet its obligation to establish effective standards of program length.

Middle States Comments

Middle States noted that recent research and evidence indicates that the fundamental concern of higher education's constituencies is whether students graduate with appropriate knowledge, skills, and competencies, not how many hours they spend in a classroom. Middle States also

stated that through an institution's self-study report and in the on-site evaluation by a team of peers, the institution must demonstrate that it has offerings that are of sufficient content, breadth, and length, and conducted at levels of rigor appropriate to the programs or degrees offered. Middle States stated that because its member institutions vary widely in mission and offerings, it does not prescribe one particular methodology for ensuring and documenting an appropriate level of rigor.

OIG Response

Whether a student graduates with appropriate knowledge, skills, or competencies does not obviate the need to properly determine program length or the assigned credit hours. Title IV funding for students is based on the number of credit hours a student takes. The lack of minimum requirements for credit hours and the assignment of credit hours could result in inflated credit hours, the improper designation of full-time student status, the over-awarding of Title IV funds, and excessive borrowing by students, especially with distance, accelerated, and other programs not delivered through the traditional classroom format. Even if student outcomes can inform the assignment of credit hours, Middle States does not, as noted in our report, provide minimum requirements that institutions must meet to ensure that academic offerings are of appropriate academic content, breadth, length, and rigor. It is incumbent on Middle States to determine the appropriate assignment of credit hours and to define an acceptable minimum outcome.

Middle States Comments

Middle States stated that it provided OIG with additional reports and OIG reviewed the reports, but because the reports were not specifically requested by OIG, they were not discussed in the report.

OIG Response

We contacted Middle States for clarification of this statement. Middle States informed us that this statement referred to two document roadmaps for an institution that were provided to us as an example of how roadmaps showed that the institution had addressed the standards. We added a reference to these roadmaps in Issue No. 3.

Middle States Comments

Middle States stated that it also has some concern about OIG's use of a judgmental sample of institutions and stated that it is not clear whether the sample is a statistically valid representation. Middle States stated that the selected sample disproportionately represents large institutions and those that conducted a specific model of self-study that is used by a relatively small number of Middle States institutions.

OIG Response

We stated in the Objectives, Scope, and Methodology section that our sample was based primarily on the highest amount of title IV funding received for each type of institution. The sample was judgmental and not intended to be a statistical representation of all the institutions Middle States accredits. The size of the institutions and the type of self-study undertaken by the institutions in our sample do not affect our conclusions related to Middle States' lack of minimum requirements for program length or the assignment of credit hours.

Middle States Comments

Middle States stated that most of the reports OIG requested were between five and eight years old, and that the Commission has since updated its procedures and expectations.

OIG Response

Middle State’s statement concerning the self-study reports is not accurate. We noted in the Objectives, Scope, and Methodology section that one self-study report was prepared in 2001, one in 2004, one in 2005, two in 2006, and one in 2008. Four of the six self-study reports are less than five years old. We also reviewed Middle State’s current *Characteristics of Excellence in Higher Education*, which outlines Middle States’ requirements of affiliation and standards for accreditation. We reported in Issue No. 1 and 2 that Middle States does not have minimum requirements for program length or for the assignment of credit hours.

Middle States Comments

Middle States clarified a reference in the Middle States’ Perspective section of the report concerning organizations of faculty and other professionals who are experts in their teaching discipline.

OIG Response

We have modified that reference.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of this inspection were to determine:

- (1) What guidance Middle States provides to institutions regarding program length and credit hours,
- (2) What guidance Middle States provides to peer reviewers to assess program length and credit hours when evaluating institutions, and
- (3) What documentation Middle States maintains to demonstrate how it evaluates institutions’ program length and credit hours.

We notified Middle States of our inspection on June 18, 2009 and began our fieldwork on July 6, 2009.

We reviewed applicable laws and regulations related to the accreditation of institutions. We also reviewed guidance that Middle States provided to its institutions and to its peer reviewers.

We reviewed Middle States’ institution files from a judgmental sample of institutions that Middle States has accredited. We reviewed the following institutions: Art Institute of Pittsburgh, Columbia University in the City of New York, New York University, Pennsylvania State University, Strayer University, and University of Pittsburgh. We reviewed the most recent self-study report for six decennial reviews—one for initial accreditation and five for

reaccreditation. One self-study report was prepared in 2001, one in 2004, one in 2005, two in 2006, and one in 2008. We selected two public, two private, and two proprietary schools based primarily on the highest amount of Title IV funding received for each type of institution.

We requested a listing of all institutions with a final action for a substantive change from January 1, 2008 through June 1, 2009, as specified in 34 C.F.R. 22(a)(2)(iii) through (vi). We reviewed three institutions with recent substantive changes to its program. We selected Delaware State University because no institutions from Delaware were in our initial sample of institutions undergoing a decennial review. We selected Georgian Court University because no institutions from New Jersey were in our initial sample. We selected Touro College because there has been previous audit and investigative work that had been done at the institution.

During our entrance conference, Middle States senior staff stated that it focused on program length during the institution's initial candidacy period. We reviewed Middle States' documentation for three institutions seeking candidacy: Globe Institute of Technology, International Graduate University, and Phillips Beth Israel School of Nursing.

Our inspection was performed in accordance with the *2005 President's Council on Integrity and Efficiency Quality Standards for Inspections* appropriate to the scope of the inspection described above.

ADMINISTRATIVE MATTERS

In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress twice a year on the audits that remain unresolved after six months from the date of issuance.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

We appreciate the cooperation given us during this review. If you or your staff have any questions, please contact W. Christian Vierling, Director of Evaluation and Inspection Services, at (202) 245-6964.

Respectfully,

/s/

Wanda A. Scott
Assistant Inspector General
Evaluation, Inspection, and Management Services

Electronic cc: Daniel T. Madzellan, Delegated the Authority to Perform the Functions and Duties of the Assistant Secretary for Postsecondary Education

Appendix

State/Territory	Credit Hour Requirements
Maryland <i>Code of Maryland Regulations,</i> § 13B.02.02.16D	(1) An in-State institution shall award 1 semester hour of credit for: <ol style="list-style-type: none"> (a) A minimum of 15 hours, of 50 minutes each of actual class time, exclusive of registration, study days, and holidays. (b) A minimum of 30 hours, of 50 minutes each of supervised laboratory or studio time, exclusive of registration, study days, and holidays; (c) A minimum of 45 hours, of 50 minutes each of instructional situations such as practica, internships, and cooperative education placements, when supervision is ensured and learning is documented; or (d) Instruction delivered by electronic media based on the equivalent outcomes in student learning in §D(1)(a) of this regulation, and may include a combination of telelessons, classroom instruction, student consultation with instructors, and readings, when supervision is ensured and learning is documented. (2) One quarter hour of credit is awarded for instruction equivalent to 2/3 of the contact hours required for 1 semester hour of credit.
New Jersey <i>New Jersey Administrative Code,</i> § 9A:1-1.2	“Semester credit hour” means 50 minutes of face-to-face class activity each week for 15 weeks (or the equivalent attained by scheduling more minutes of face-to-face class activity per week for fewer weeks in the semester) in one semester complemented by at least 100 minutes each week of laboratory or outside assignments (or the equivalent thereof for semesters of different length).
New York <i>Regulations of the Commissioner of Education, Chapter II,</i> § 50.1(o)	Semester hour means a credit, point, or other unit granted for the satisfactory completion of a course which requires at least 15 hours (of 50 minutes each) of instruction and at least 30 hours of supplementary assignments, except as otherwise provided pursuant to section 52.2(c)(4) of this Subchapter. This basic measure shall be adjusted proportionately to translate the value of other academic calendars and formats of study in relation to the credit granted for study during the two semesters that comprise an academic year.
Pennsylvania <i>Pennsylvania Code, Title 22,</i> <i>Subpart C, § 31.21</i>	A semester credit hour represents a unit of curricular material that normally can be taught in a minimum of 14 hours of classroom instruction plus appropriate outside preparation or the equivalent as determined by the faculty. A quarter credit hour represents a unit that can be taught in a minimum of 10 hours of classroom instruction, plus appropriate outside preparation or the equivalent as determined by the faculty.
Puerto Rico <i>Puerto Rico Council on Higher Education, Regulation for Granting of Licenses to Institutions of Higher Education,</i> <i>Chapter V, Article 51.3(g)</i>	The total and proportion of credits required for completion of a degree must correspond to established practices in institutions of higher education (general education, specialized area and concentration, electives, thesis, etc.), or any other model of course classification identified by the institution. ²
Delaware	None.
District of Columbia	None.
U.S. Virgin Islands	None.

² English translation from the Puerto Rico Council on Higher Education, Regulation for Granting of Licenses to Institutions of Higher Education, Chapter V, Article 51.3(g).



Middle States Commission on Higher Education

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October 28, 2009

W. Christian Vierling, Director
Evaluation and Inspection Services
Office of Inspector General
550 12th Street, S.W., Room 8153
Washington, DC 20024

Dear Mr. Vierling:

On behalf of the Middle States Commission on Higher Education, I am pleased to submit the Middle States Commission on Higher Education's response to the draft management information report, *Review of the Middle States Commission on Higher Education's Standards for Program Length*. We appreciate the Office of Inspector General staff's collegiality throughout this review process and respect their effort to understand Middle States policies, processes, and philosophy.

While the MSCHE acknowledges that the draft report accurately reflects the OIG staff's findings, the MSCHE must reiterate here that it has a different philosophy with regard to the use of credit hours and program length as a measure of quality in higher education.

As stated in the draft report, the MSCHE provides information to institutions on existing Federal and State definitions and requirements with regard to credit hour, program length by degree, term length, etc., as well as resources to assist institutions in researching these requirements and definitions on their own. Federal definitions are very clear and state licensing requirements establish minimums in all but three of the MSCHE's states. Further, we maintain that the USED definitions for program length and credit hours are so widely known and accepted across higher education that the MSCHE evaluators do not typically find it necessary to address these subjects when reporting on programmatic content, breadth, length and rigor in their reports.

While the draft report acknowledges that the MSCHE focuses on student learning outcomes rather than class time, it is important that readers understand fully the Commission's approach to assuring educational quality and rigor. This is especially important in light of the MSCHE's recognition by the Secretary as a reliable authority regarding the quality of education offered by the institutions this agency accredits. Recent research and evidence indicates that the fundamental concern of higher education's constituencies – students, their families, government policymakers, and employers, to name a few – is whether students graduate with appropriate knowledge, skills, and competencies, not how many hours they spend in a classroom. As recently as two weeks ago, the president of the Lumina Foundation noted in a speech that American colleges are not doing enough to measure learning outcomes and that learning should be recognized as “the primary measure of quality in higher education.” (As reported in *The Chronicle*, October 14, 2009.)

Mr. W. Christian Vierling
October 28, 2009
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As stated in the MSCHE's Standard 11, "the institution's educational offerings must display academic content, rigor, and coherence that are appropriate to its higher education mission. The institution identifies student learning goals and objectives, including knowledge and skills, for its educational offerings." Through its self-study report and in the on-site evaluation by a team of peers, the institution must demonstrate that it has offerings that are of sufficient content, breadth and length, and conducted at levels of rigor appropriate to the programs or degrees offered. The institution can demonstrate this through the actual student learning goals it sets and the institution's assessment of actual student learning outcomes achieved (Commission Standard 14). The institution also verifies rigor by documenting the basis on which it establishes its student learning goals and develops its curriculum.

Because MSCHE member institutions vary widely in mission and offerings, the Commission does not prescribe one particular methodology for ensuring and documenting an appropriate level of rigor. Institutions might do so by comparing their outcomes against those of peers, against the standards of professional or licensure organizations, against admissions requirements for higher level study (2-year to 4-year, 4-year to graduate), or against employers' needs and expectations, to give just a few examples.

The MSCHE would like to note for the record that the Commission staff provided additional reports that were reviewed by the OIG visitors, but because they were not specifically requested by the OIG visitors, they were not discussed in the report. The Commission also has some concern about the review methodology which used a "judgmental sample of institutions." It is not clear that such a sample is a statistically valid representation. Indeed, the selected sample disproportionately represents large institutions and those that conducted a specific model of self-study that is used by a relatively small number of MSCHE institutions. More importantly, most of the reports requested were between five and eight years old. In the ensuing time, the Commission has updated its procedures and expectations.

Finally, the MSCHE also would like to clarify the reference to "higher education associations or societies" on page 7 of the draft report. The groups to which Commission staff referred are "disciplinary associations," which are organizations of faculty and other professionals who are experts in their teaching discipline.

Sincerely yours,

/s/

Elizabeth Sibolski, Ph.D.
Acting President