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Macias, Wendy

From: [REDACTED]
Sent: Tuesday, June 23, 2009 2:57 PM
To: negreg09
Subject: written testimony from [REDACTED]
Attachments: higher ed opportunity act.pdf

Dear Sir or Madam,

[REDACTED] was unable to attend any of the recent public hearings held in advance of the upcoming negotiated rulemaking sessions. I respectfully submit the attached written testimony regarding Title IV of HEOA on behalf of [REDACTED], president, Association of American Colleges and Universities.

I have also faxed a copy of the attached document to Wendy Macias as instructed.

[REDACTED]
[REDACTED]
Association of American Colleges and Universities

[REDACTED]

liberal Education--Our Best Investment in Our Shared Futures



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June 22, 2009

Wendy Macias
U.S. Department of Education
1990 K Street, NW
Room 8017
Washington, DC 20006

Dear Ms. Macias,

I am pleased to submit the attached written testimony related to the upcoming proposed negotiated rulemaking to prepare new regulations under Title IV of the Higher Education Opportunity Act.

Please feel free to contact me if you have any questions about the attached testimony.

Sincerely,



Encs.

Written Testimony on Negotiated Rulemaking for HEOA Title IV

Submitted by [REDACTED], Association of American Colleges and Universities
[REDACTED]

I am pleased to offer the following testimony in support of the Department of Education's announced negotiated rulemaking on Title IV of the Higher Education Opportunity Act. My remarks are informed by our extensive work on the quality of student learning with the Association of American Colleges and Universities' (AAC&U's) 1200 member colleges and universities. AAC&U's members are half public, half private, and represent the full spectrum of American higher education, two-year, four-year, research universities, and many state systems.

It is heartening to see that Secretary Duncan and his colleagues are moving quickly and aggressively to implement the provisions of the HEOA and leverage departmental resources to increase access for more students to the advantages provided by an excellent college education. My remarks below focus on how we can build the capacity of our system of education—elementary, secondary and postsecondary—not just to accelerate college enrollment and completion, but to ensure that every student graduates from high school ready for success at college-level work and that every college student earns a postsecondary credential that will have lasting value.

Research sponsored by AAC&U, as part of its initiative, Liberal Education and America's Promise (LEAP): Excellence for Everyone as a Nation Goes to College, underscores the direct connection between America's future prosperity and raising the levels of achievement for all students. This is why the department's increased focus on college students' persistence and completion is so important. Our conception of persistence and completion needs, however, to be expanded to focus directly on the capabilities that students work to develop through their combined school and college studies. Our definition of successful educational "completion," in other words, should encompass students' achievement of essential learning outcomes at each level of education. Completion defined in terms of courses and credit hours alone will leave many college students seriously underprepared.

AAC&U's research shows that more than 70 percent of employers want our colleges and universities to place more emphasis on high-levels of achievement in the following specific areas: science and technology, teamwork skills in diverse settings, complex written and oral communication skills, critical and analytic reasoning, global and intercultural knowledge, information literacy and applied knowledge in real-world settings (see attached). New research from the Georgetown Center on Education and the Workforce confirms with robust economic data the direct connection between these higher level skills and knowledge and career success. These capabilities or learning outcomes are needed for the jobs of the future; they are the forms of learning that are rewarded in the marketplace. These learning outcomes also contribute directly to Americans' readiness to participate in our democracy as active and knowledgeable citizens.

The implication of these data, however, is that graduating more students from college is important, but insufficient as a national goal for postsecondary learning and achievement. The skills *and* knowledge graduates gain from both high school and college must be robust enough and flexible enough for graduates to thrive in a competitive global environment or those increased numbers of degrees won't actually fuel our economic recovery and our long-term economic and societal vitality. As Georgetown labor economist and director of the Center on Education and the Workforce, Anthony Carnevale has put it, "what matters to career success is students' development of a broad set of cross-cutting capacities."

As employers attest, all students today need this broader set of skills and abilities to thrive in an environment characterized most of all by the need for innovation, complex and often intercultural communication, and sophisticated problem-solving. These capabilities, moreover, are best developed through engagement with rigorous content, challenging assignments, active learning, and exploration of real-world issues in all their complexity. Traditionally, we have provided this kind of engaged and empowering liberal education only to a small part of our college population. Today, AAC&U's research shows, many colleges and universities seek to provide this kind of education—with a clear emphasis on active learning and real-world problems—to all their students, including students who, traditionally have been guided to narrower forms of postsecondary study.

Institutions of higher education—public, private, two-year, four-year—all across the country are re-focusing the attention of their faculty and their students to achieve the kinds of learning outcomes described above and on the attached charts. Indiana University-Purdue University, Indianapolis, for instance, now organizes all its advising around a plan of action to ensure that every student achieves the full spectrum of learning outcomes he or she needs. A very different college, Miami-Dade College, brought together faculty, students, and academic leaders to sign a covenant of engagement with ten learning outcomes, including the ability to “communicate effectively” and to “solve problems using critical and creating thinking and scientific reasoning.” Systematic assessment—anchored in students' work on problem-based “scenarios”—probes students' gains in expected outcomes and areas of needed change. Private institutions that serve significant numbers of first generation and Pell-eligible students also are making vigorous efforts to engage their students in challenging projects that help them develop the skills and breadth of knowledge they need for career opportunity and success.

This trend is far-reaching. In fact, a recent survey of AAC&U members showed that nearly 80 percent now have a common set of learning goals for all their students. Typically these goals address the knowledge outcomes and capabilities that employers seek (see attached chart).

Naming one's goals for student learning, of course, is but the first step. Any support that the department of education can provide to institutions to develop their capacities both to advance and assess these outcomes will help accelerate this very positive trend toward making excellence inclusive.

College Preparation: High Standards, More Academic and Social Support, and Clear Expectations

While there is significant progress in reorganizing college learning to serve 21st century societal and economic needs, students need to come to college with far higher levels of achievement and greater understanding of what really matters in college—these essential learning outcomes—than is currently the case. As is clearly recognized in the HEOA, the first step is for all students to take a rigorous curriculum in high school. However, we must define a “rigorous high school curriculum” and what college readiness really means more precisely and more holistically. The current focus on the fields of mathematics, English, and science is important, but far from enough. In a global century, Americans also need much higher levels of global, historical, language, and cross-cultural learning. College and high school leaders need to work together to create more definitive and consistent entry assessments designed to ensure that students graduating from high school have the baseline skills and abilities to move to higher levels of achievement in all the essential learning outcomes that have now become priorities both for employers and for higher education.

Support for student success needs to be comprehensive, including, for instance, a robust first-year college program to encourage engagement with learning and a connection to faculty, staff, and students

at the institution. Advisement, supported by online tools and personal contact; collaborative forms of learning; and courses that develop both essential skills and “college navigation” skills are essential components to such programs. Many of the same approaches apply to high school students as well, with an added emphasis on parental and peer support and access to the college environment. And all these programs depend most of all on trained and committed faculty and staff and learning environments that allow for enough of these individuals to ensure that every student gets the attention she or he deserves.

College preparation and orientation efforts also must address a significant communications gap between what really does matter in college learning today and what students *understand* about the importance of education for success in today’s world. While progress is being made in increasing high school standards and providing a more rigorous high school curriculum to more students, too few students understand that the learning outcomes described above are what really matter for success in college and in life after graduation. In our recent survey of our 1200 college and university members, of those nearly 80 percent that have adopted a broad set of stated learning outcomes for all their undergraduate students, only about 5 percent reported that all or most of their students actually understand those intended learning outcomes. Focus groups we conducted with high school students also showed that these students had a dangerously narrow understanding of what they need to learn in college. Today’s students lack substantive information about the most important outcomes of college and about the kinds of assignments and preparation they need to be ready to succeed in college.

The Department, then, is in a position to powerfully influence how students are prepared for college and how they make their way through college toward graduation. Simplifying the financial aid process is an important first step, but students also need better information about the role of cross-cutting capacities in career opportunity and success, better counseling about what really matters in college, and more personalized support to ensure academic achievement and a focused motivation to learn. They need to understand the career consequences they will confront if they leave college with the right number of course credits but without those cross-cutting capacities—the essential learning outcomes—that they will need for success in their jobs and for continuous learning across the lifespan.

For instance, college outreach and preparation programs supported by the Department of Education could provide to students much more information about the essential outcomes of college and what the changing economy will demand of them. Our 1200 college and university members have developed the attached set of essential learning outcomes and employers, college and K-12 educators, policy makers, and civic leaders all agree that these forms of learning best prepare students for success in today’s world. Hundreds of colleges and several large state systems are now using these outcomes as a framework to guide curricular planning, assessment policies, and new alignments between K-12 and college curricula.

Students—all students-- need to know what these outcomes are and why they matter. We can strengthen college preparatory programs supported by the Department by building the capacity of those programs as well to *engage* students with these outcomes and with the real meaning of academic success in today’s world.

What Students Are Required to Do: Linking Performance, Readiness, Persistence, and Completion

Many of the Department's programs are designed to encourage students to take a "rigorous high school curriculum." Data from the Department itself clearly show that only a fraction of today's high school students are, in fact, taking a rigorous curriculum—defined by an ample set of prescribed academic courses. One 2001 analysis by Horn and Kojaku found, for instance, that only 19 percent of high school graduates had taken this kind of curriculum. These researchers also found, however, that those who did take the most rigorous high school courses were the most likely to persist and graduate from college, even controlling for income and racial/ethnic background. High schools all across the country are, of course, trying to increase the rigor of their course offerings, but the very definition of "rigor" must also be expanded beyond just a list of course titles. Educational research is making clearer every day that it is not just the specific level of course material or what the standards say that determine success. It is the actual work students are required to do in those rigorous courses that makes the difference. **The K-12 and higher education community—supported by the federal Department of Education and state-level entities—should develop a concerted and coordinated effort to reach agreement not only on common standards, but on the kinds of work assignments, tasks, and projects all students should be required to do in core courses in order to be ready for success either in work or college.**

Funding sources must also recognize the barriers to learning and the incremental successes that define any individual student's journey. Low-income and minority students, for instance, face challenges that traditional college-bound students do not face. The more we can do to recognize those challenges and tailor funded programs to help students overcome them, the better our success rates will be. This fact is particularly relevant to how we define success, including our definitions of "persistence" and "completion." Success must be measured by taking into account levels of college preparation, retention rates, key course completion rates, success with ESL training, occupational and workforce success, and other markers. Recent research shows both that certain educational practices provide what George Kuh of Indiana University describes as a "compensatory benefit" for students in groups that have historically experienced less success in college. But we need new focused studies to show how and under what conditions these practices help underserved students successfully achieve the essential learning outcomes that employers seek, prize, and reward.

Graduation isn't the only measure of success. What graduating students can actually do and how they deploy their abilities in the service of their own success and contributing back to our communities will be the real measure of institutional achievement.

Aligning Standards, Core Curricula, and Performance Tasks

The challenge before us is daunting. No country of our size has yet even attempted to educate such a large proportion of its population to these higher levels of achievement. But, a first step must be greater collaboration across the levels of learning, a focusing of resources on those institutions and programs best positioned to make progress with students traditionally not well-served by higher education, and clarity in expectations and policies. Leaders at the campus, system, state, and federal levels need to ensure more accuracy, clarity, and consistency in standards, in curricular requirements, and in the learning outcomes students should achieve in order to graduate.

Many institutions—of all kinds—are already developing productive college-high school partnerships. And these partnerships are an essential component to increasing graduation rates and achievement levels by helping students see a purposeful educational pathway and take a first step into the collegiate learning environment. But if public high school students matriculating to college—especially our open-admissions institutions—continue to have the same levels of college preparation we currently have, we

will be fighting an endless uphill battle, especially as higher education institutions face decreasing budgets all across the country.

Support from the federal government—including funding, but also help in convening and coordinating key players, publicizing successful efforts already underway, and mobilizing popular support—will be absolutely crucial as we work to change outdated educational curricula and counterproductive educational practices. Colleges, community colleges and universities—in concert with employers—are already shaping a new definition of “success” that places students’ capabilities directly at the center. Federal policy should both support and publicize this important leadership effort from the higher education community. Turning “persistence and completion” into “persistence, completion and demonstrated capability” would be an important first step for federal policy and a signal of renewed commitment to American democracy.

Percentage of Employers Who Want Colleges to “Place More Emphasis” on Essential Learning Outcomes



★ Knowledge of Human Cultures and the Physical and Natural World

• Science and technology	82%
• Global issues	72%*
• The role of the United States in the world	60%
• Cultural values and traditions (U.S./global)	53%*

★ Intellectual and Practical Skills

• Teamwork skills in diverse groups	76%*
• Critical thinking and analytic reasoning	73%
• Written and oral communication	73%
• Information literacy	70%
• Creativity and innovation	70%
• Complex problem solving	64%
• Quantitative reasoning	60%

★ Personal and Social Responsibility

• Intercultural competence (teamwork in diverse groups)	76%*
• Intercultural knowledge (global issues)	72%*
• Ethics and values	56%
• Cultural values/traditions—U.S./global	53%*

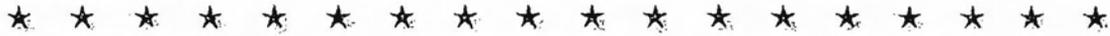
★ Integrative and Applied Learning

• Applied knowledge in real-world settings	73%
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Note: These findings are taken from a survey of employers commissioned by the Association of American Colleges and Universities and conducted by Peter D. Hart Associates in November and December 2006. For a full report on the survey and its complete findings, see www.aacu.org/leap.

*Three starred items are shown in two learning outcome categories because they apply to both.

The Essential Learning Outcomes



Beginning in school, and continuing at successively higher levels across their college studies, students should prepare for twenty-first-century challenges by gaining:

★ Knowledge of Human Cultures and the Physical and Natural World

- Through study in the sciences and mathematics, social sciences, humanities, histories, languages, and the arts

Focused by engagement with big questions, both contemporary and enduring

★ Intellectual and Practical Skills, including

- Inquiry and analysis
- Critical and creative thinking
- Written and oral communication
- Quantitative literacy
- Information literacy
- Teamwork and problem solving

Practiced extensively, across the curriculum, in the context of progressively more challenging problems, projects, and standards for performance

★ Personal and Social Responsibility, including

- Civic knowledge and engagement—local and global
- Intercultural knowledge and competence
- Ethical reasoning and action
- Foundations and skills for lifelong learning

Anchored through active involvement with diverse communities and real-world challenges

★ Integrative Learning, including

- Synthesis and advanced accomplishment across general and specialized studies

Demonstrated through the application of knowledge, skills, and responsibilities to new settings and complex problems

Note: This listing was developed through a multiyear dialogue with hundreds of colleges and universities about needed goals for student learning; analysis of a long series of recommendations and reports from the business community; and analysis of the accreditation requirements for engineering, business, nursing, and teacher education. The findings are documented in previous publications of the Association of American Colleges and Universities: *Greater Expectations: A New Vision for Learning as a Nation Goes to College* (2002), *Taking Responsibility for the Quality of the Baccalaureate Degree* (2004), and *Liberal Education Outcomes: A Preliminary Report on Achievement in College* (2005).

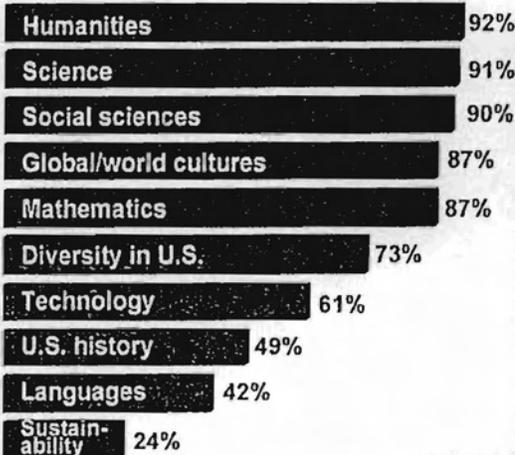
2009 Survey of Chief Academic Officers at AAC&U Member Institutions

- 78% of institutions have a common set of intended learning outcomes for all their undergraduate students

Goals for All Students' College Learning

Among respondents from campuses WITH campus-wide goals, percent saying their institution's common set of learning goals/outcomes addresses each area of knowledge/intellectual skills & ability

Areas of Knowledge



Intellectual Skills/Ability

