National Institute for Learning Outcomes Assessment

October 2010

Regional Accreditation and Student Learning Outcomes:

Mapping the Territory

Staci Provezis

Foreword by Stanley O. Ikenberry

Occasional Paper #6

learningoutcomesassessment.org

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"The findings in this study should be of interest to all those concerned with the future of higher education in the United States and the integrity of the systems of quality control that sustain it."

Stanley O. Ikenberry

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Abstract

Regional Accreditation and Student Learning Outcomes

While institutions engage in assessment for various reasons, one principle reason is to meet the expectations of accreditors. Accreditation in the United States serves as both a quality assurance and accountability mechanism, and it has been the focus of much discussion since the Spellings Report and the Reauthorization of Higher Education Act, the common contention being that regional accreditation organizations should be assuring high levels of quality education from the institutions they accredit.

In this paper, I examine the policies and procedures of the seven regional accreditors as they relate to student learning outcomes assessment. My findings indicate that accreditors (1) subscribe to the Council for Regional Accreditating Commissions' (C-RAC) Principles of Good Practice; (2) do not prescribe strategies for assessment although some offer structured guidance; (3) predominantly consider transparency an issue of institutional integrity; (4) agree that faculty are a crucial stakeholder in student learning outcomes assessment; (5) cite institutions for deficient work in assessment at higher levels than in the past; and (6) offer various resources to assist institutions in meeting their expectations. In many ways, these organizations exhibit a degree of consistency across regions with regard to student learning outcomes assessment. However, more could be done to define useful approaches to assessment, to disseminate these approaches, and to address the issue of assessment as a cost liability for institutions. Regional accreditors and their institutional members particularly need to work together to address two concerns: faculty involvement and transparency. My findings and recommendations provide, in miniature, a map of the current territories of regional accreditation, with an emphasis on organizations' efforts to foster both consistency and creativity as they assist institutions in their assessment activities. At their foundation, accreditors' expectations are similar, but there are different approaches being tested across the nation. More cross-pollination among the regions would allow each to learn and grow from the others.

Foreword

Accreditation and Assessment: Inevitable Partners

Accreditation in American higher education is at once ubiquitous and shrouded in ambiguity. Taking root a century ago, the concept of accreditation was created by institutions themselves as a means to assess academic quality. Over the years the uses of accreditation have grown to include, for example, qualitative distinctions among programs in professional fields such as medicine, law and countless others; a litmus test for use by state and federal policy makers in the prudent distribution of public funds; and, of course, help for students and their families as well as the general public in making informed choices.

The question of how – precisely on what basis – accrediting groups make these difficult and consequential decisions about which institutions and programs should be granted accreditation and which should not has never been fully addressed, remaining a work in progress. As a result, accreditation processes and decisions are often contested, either informally within the academy or legally through the courts. To complicate matters, the range of institutions seeking accreditation has expanded to include not just traditional public and not-for-profit independent campuses but for-profit corporations. The variety of approaches to teaching and learning has expanded to embrace on-line learning, challenging process-based judgments of an earlier era. Given these changes, the evidentiary base on which regional and specialized accrediting groups make the consequential decision to grant or deny accreditation becomes a hugely important question.

In this manuscript, Staci Provezis from the National Institute for Learning Outcomes Assessment carefully examines how regional accrediting groups go about the job of making judgments about institutional quality. Specifically, she focused on the standards and expectations held by the seven regional accrediting groups for institutional assessment of student learning outcomes, pointing out the similarities and difference among regions. What is the standard for assessment of learning outcomes against which institutions will be held? And even more important, what expectation do regional accrediting groups hold for how the evidence of assessment is used? The relevance of these questions becomes clearer when we learn from Dr. Provezis that the most common focus of letters to institutions following accreditation visits is the adequacy of institutional assessment of learning outcomes.

In an earlier study, George Kuh and I shared the findings from a national survey of chief academic officers. We worked to understand the current state of learning outcome assessment on campus. Our report, *More Than You Think; Less Than We Need,* revealed a number of things, including the fact that more attention was being given to the assessment of learning outcomes on college campuses than many had assumed. At the same time, the survey evidence made plain that the challenge of assessing what students know and are able to do is being only partially and unevenly addressed and that the slim evidence of assessment too often has no consequence, left unused.

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Foreword (cont.)

The other major finding of our work that stood out was that chief academic officers pointed out that regional and specialized accreditation standards and expectations were the main drivers of outcome assessment initiatives on their campuses.   In some respects, learning that accreditation was the main driver of assessment on most campuses is disappointing. Instead, we would have been elated if institutions themselves, faculty members and academic and administrative leaders and governing boards, driven by the desire to be the best and continuously improve, would have been in the driver's seat.

Still, if accreditation *is* driving learning outcome assessment in American higher education, where is it taking us? What are the standards? What is the variation among regions? And how are regional accrediting groups guiding and helping institutions meet these rising expectations for outcome evidence? These and other key questions are probed in this NILOA Occasional Paper #6, *Regional Accreditation and Student Learning Outcomes: Mapping the Territory.* It comes as a result of a year-long effort by Dr. Provezis and the generous cooperation of the seven regional accrediting commissions, all made possible by support from Lumina Foundation for Education, Carnegie Corporation, and The Teagle Foundation. The findings should be of interest to all those concerned with the future of higher education in the United States and the integrity of the systems of quality control that sustain it.

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Regional Accreditation and Student Learning Outcomes: Mapping the Territory

Staci Provezis

What is driving the assessment movement in American higher education? In probing that question the National Institute for Learning Outcomes Assessment (NILOA) has found that while several forces have converged, prompting more institutions to assess student learning outcomes, regional accreditation is among the most important of those forces. Chief academic officers at regionally accredited institutions across the U.S. cite accreditation as the *primary reason* their institutions assess student learning (Kuh & Ikenberry, 2009). Underscoring this finding, the comments of college and university presidents during a focus group at the 2009 annual meeting of the American Council on Education testified to the power of accreditation as a driving force in student learning outcomes assessment:

- "[New England Association for Schools and Colleges] is pushing for outcomes." (President, Liberal Arts College)

- "Accreditation visit coming up. This drives what we need to do for assessment." (President, Urban University)

- "[Southern Association of Colleges and Schools] Quality Enhancement Plan was important to our assessment efforts." (President, State Regional Public University)

- "[Higher Learning Commission] came down on us hard over assessment." (President, Small Liberal Arts College)

Several forces have converged, prompting more institutions to assess student learning outcomes. Regional accreditation is among the most important of those forces.

This paper focuses on policies and procedures as they relate to student learning outcomes assessment at each of the seven regional accreditation organizations in the U.S. and explores a set of major findings from this study, including recommendations for advancing student learning outcomes assessment. For this study, interviews were conducted with accreditation organization representatives, and site visits were made to the organizations in all but one of these regions.[1] In the second phase of the study, NILOA and the Council of Regional Accrediting Commissions (C-RAC), composed of the heads of the seven regional organizations, jointly sponsored an invitational "Symposium on Student Learning Outcomes Assessment."[2]

[1] During July 2009, the author visited six of the regional accreditation organizations, interviewing one individual or more who could speak of the accreditation organization's practices regarding student learning outcomes assessment. (The Northwest Commission on Colleges and Universities [Northwest] did not agree to be interviewed for this study.) Prior to the interviews, each region's accreditation standards and websites were reviewed for information on student learning outcomes assessment. During the interviews, which lasted between two and five hours, interviewees provided various documents for the study, including proceedings of meetings and workshops, memos, and redacted accreditation letters. The interview data were transcribed and all materials were analyzed for emerging themes based on a set of research questions focusing on the expectations of the accreditation organizations.

[2] Key findings from the interviews were presented in October 2009 at the "Symposium on Student Learning Outcomes Assessment," sponsored by NILOA and C-RAC. Two representatives from each of the regional accreditation organizations attended this symposium (except for Northwest, which did not attend), reviewed information collected and presented for their region, and had the opportunity to respond.

One overriding impression emerged from the study: Although there are seven quasi-independent regional organizations in the accreditation system, their policies and approaches to student learning outcomes assessment tend to be more alike than different. The seven regional accreditation organizations appear to share similar expectations for student learning outcomes assessment.

Findings

While supporting the claim that the regional accreditation organizations have similar expectations with regard to assessing student learning, the findings from this study also shed light on the various ways these organizations are shaping institutional assessment activity. Specifically, the study found the following:

- Each of the seven regional accreditors appears to be following the guidelines set forth in the C-RAC's Principles for Good Practices (2003).

- All regional accreditors expect learning outcomes to be defined, articulated, assessed, and used to guide institutional improvement.

- None of the regional accreditors prescribe specific assessment practices or tools, but several provide structured guidance with regard to ways to assess student learning.

- All regional accreditors appear to agree that public disclosure of learning outcomes assessment information is an issue of institutional integrity.

- With one exception, regional accreditation standards urge that faculty be involved with learning outcomes assessment, particularly with respect to the creation of learning goals and of plans linking assessment to improvement.

- Perhaps most relevant, each of the regional accreditors reported that deficiencies in student learning outcomes assessment were the most common shortcoming in institutional evaluations.

- And finally, through multiple avenues, all but one of the regional accreditors provide institutions with direct assistance (in the form of materials, programs, and other means) to improve their capacity to assess student learning outcomes.[3]

C-RAC Guidelines

The heads of each of the regional accrediting groups belong to the Council of Regional Accrediting Commissions (C-RAC), the purpose of which is to promote collaboration between the regional accrediting commissions so as to build on best practices strategies, to work with the U.S. Congress and the Department of Education, and to communicate with all stakeholders.[4] During the interviews, representatives from every participating accreditation region discussed the value and importance of the C-RAC's Regional Accreditation and Student Learning: Principles for Good Practices (2003).

The C-RAC principles are designed to "help guide the work of all regional commissions" by showing "the commissions' shared commitment to student learning" and by providing "a basis for assessing accreditation practice across the regions" (pp. 1–2). The interviews, regional accreditation standards, and materials from the regional accreditors all suggest that the basic C-RAC principles have, to varying degrees, been adopted by each of the regional commissions. Essentially, the C-RAC principles offer a common statement of expectations for learning outcomes assessment. Each region, for instance, expects institutions 1) to articulate learning outcomes that are directly related

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[3] It appears from its website that Northwest does not offer workshops or resources on student learning outcomes assessment; not agreeing to be interviewed or to respond to questions, Northwest did not provide information to the contrary.

[4] See C-RAC by-laws for more about the organization, at http://www.ncahlc.org/download/C-RAC_BYLAWS.pdf

to institutional missions; 2) to look for clear, suitable evidence of the presence of those outcomes; and 3) to build assessment capacity through training (p. 3). The C-RAC principles speak both to what accreditors should do and to what regional accreditors should expect institutions to do.

A review of the various policies and practices of the regional accrediting organizations suggests they are, for the most part, adhering to the basic C-RAC principles as set forth in this national "agreement." Even though they are commonly criticized for having different policies and procedures,[5] these organizations generally adhere to loosely defined but similarly expressed expectations on student learning outcomes assessment. Most have changed their accreditation standards since the 2003 C-RAC principles were adopted and/or have strengthened standards and expectations for outcomes assessment. Moreover, they regularly share and discuss assessment strategies with institutions and with each other. As a result, rather than there being seven unique or distinct assessment processes and programs, the seven regional organizations are more similar than not in their approaches to outcomes assessment.

Still, within these common threads, each regional organization has its own distinctive practices and strategies influenced by its engagement with campuses and by the distinctive economic and cultural properties of its region (Brittingham, 2009). A case in point is New England Association of Schools and Colleges (NEASC), where the New England region tends to reflect a culture of institutional independence evidenced by state mottos, such as Connecticut's "Land of Steady Habits" and New Hampshire's "Live Free or Die." The New England region also has a larger proportion of private or independent colleges and universities. NEASC tries to accommodate the "rhythm of the institutions, rather than impose one" (personal communication, July 29, 2009), helping institutions find assessment practices that work for them, rather than dictating a single approach.

That the culture of a region influences both academic institutions and the organizations that accredit them should not be surprising. A national accreditation system would, according to Brittingham (2009), fail to allow for these regional differences, or to enable regions to adapt and experiment with approaches to learning outcomes assessment. Practices described later in this paper show that regional accreditors are experimenting with different strategies to assist with learning outcomes assessment. In the interviews, it was not uncommon for an accreditor's representative to refer to the successes or failures of accreditors in other regions as motivation for revising a current strategy or creating a new one. For instance, if one regional accreditation organization has a successful program, it is likely to be emulated by another accreditor—but with a difference that takes into account the culture of the region. While a national system would have certain benefits of continuity across the country, this uniformity would occur at the expense of being able to respond to regional differences or being able to experiment with different ways to approach the process. Still, although regional differences may result in minor differences in approach and philosophy, these distinctions do not preclude the emergence of an overall, more-or-less common national strategy towards learning outcomes assessment.

Definition and Articulation of Learning Outcomes

Consistent with other observations (Bardo, 2009; Ewell, 2009), all seven regional accreditors expect institutions to articulate student learning outcomes and to assess those outcomes. While ten years ago it may have been acceptable for an institution to have an assessment plan, regional accreditors today

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[5] For instance, see the American Council of Trustees and Alumni's *Why Accreditation Doesn't Work and What Policymakers Can do About It*, at https://www.goacta.org/publications/downloads/Accreditation2007Final.pdf, and *Can College Accreditation Live up to its Promise?*, at http://www.chea.org/pdf/CanAccreditationFulfillPromise.pdf. Also, see the discussions of the Spellings Commission, like those highlighted in *InsideHigherEd*'s "Dropping the Bomb on Accreditation," at http://www.insidehighered.com/news/2006/03/31/accredit.

expect that evidence of student learning outcomes will be assembled and used to improve teaching, learning, and overall institutional performance. This increased emphasis on assessment and on using assessment results for improvement is underscored by the fact that each of the regional accreditors has updated and strengthened standards for assessment at some point over the last eight years. Updates, for example, include broader expectations for student learning outcomes assessment. For example, the new accreditation standards issued in January 2010 by the Northwest Commission of Colleges and Universities (NWCCU) place less emphasis on planning than previously but require "an effective, regular, and comprehensive system of assessment of student achievement" (p. 15). Because many institutions are on a ten-year reaccreditation cycle, they are likely to confront a higher bar and raised expectations for learning outcomes assessment over the next several years. In other words, institutions reaccredited during the last decade may be vulnerable to a false sense of comfort as they prepare for the next accreditation review.

The standards of almost all of the regional accreditors include the expectation that institutions *clearly state* learning outcomes. Each regional accreditor, moreover, expects institutions to assess stated learning outcomes at all levels with *multiple measures* and to *use* the assessment information primarily for institutional improvement. The New England Association of Schools and Colleges (NEASC) standards state, for example, "Evaluation enables the institution to demonstrate through verifiable means its attainment of purposes and objectives both inside and outside the classroom" (2005, p. 4). Another NEASC standard adds that institutions should implement a "systematic and broad-based approach to the assessment of student learning" that promotes understanding of both what and how students learn (p. 12).

All regional accreditors call for institutions to use multiple measures, both direct and indirect, to assess learning. This requirement is typically listed in the organization's standards. A Southern Association of Colleges and Schools Commmission on Colleges (called, SACS) representative stated that institutions should use "multiple measures," but noted that this requirement was understood in the region and therefore was not listed in the standards. SACS facilitator notes used for training peer evaluators explain that an institution should have multiple outcome measures (SACSCOC, 2009, p. 15). In the interviews, accreditor representatives all pointed out the importance of institutions using appropriate measures, for instance, avoiding using a student engagement survey as direct evidence of student acquisition of critical thinking skills.

All regional accreditors also want institutions to use the information gained from the assessment process for improvement. The Middle States Commission on Higher Education (MSCHE), for example, requires that the results of assessment be used to "improve teaching and learning" (2006, p. 63). All regional accreditors share the hope that the results of assessment will prove "useful" and that assessment data will actually be used to improve the attainment of institutional goals. They also tend to stress that the assessment process should be "ongoing." Yet as noted earlier, while all the accreditors to some degree expect institutions to state learning outcomes, to assess them, and to use the results for improvement, the typical ten-year accreditation cycle may mean that many institutions have not yet undergone these requirements.

Practices and Tools

Every regional accreditation organization is careful not to prescribe specific methods or tools for assessing outcomes. In fact each stressed the diversity of institutions in its region and the need for the assessment process to reflect the concerns of the institution. All of the accreditors echoed the sentiment that institutions should select the process that works best for them while at the same time institutions should draw on multiple indirect and direct measures

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for evidence of student learning. All regional accreditors agreed that institutions should embed the assessment process in activities already taking place on campus.

While not prescribing a model, regional accreditors expect that a campus's assessment activities will be supported by an institutional commitment to the assessment by the institution's president and other leaders and through funding and other support for assessment activities. According to a North Central Association of Colleges and Schools Higher Learning Commission (commonly referred to as simply HLC) staff member, for instance, institutions in that region may approach assessment in different ways, but one element of consistency is essential: "persistent engagement and leadership for assessment" (personal communication, July 10, 2009).

Overall, while the regional accreditors have similar expectations, they are experimenting with different assessment strategies and with the accreditation process itself. In so doing, they are creating expectations for assessment but are also providing structured ways for institutions to organize their assessment strategies by providing guidance on possible ways institutions can engage the process and provide data for accreditors. While MSCHE and the Northwest expect institutions to include assessment information as part of a larger self-study, NEASC, HLC, SACS, and the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (called Western Senior) look for evidence of learning outcomes through more focused initiatives, as illustrated below.

NEASC's policy initiative on assessment for improving student achievement and success is in two parts—Part 1: Making Assessment More Explicit (The E-series); and Part 2: Documenting Student Success (The S-series). Commonly called "the E and S forms," these forms were developed in August 2008 and became a requirement in spring 2009. The E-series requests institutions "to select and declare their basic approach to assessment and to summarize their findings" (NEASC, 2008, p. 1). While institutions may seek NEASC approval to use alternative approaches, NEASC suggests institutions select from the following approaches to assessment:

1. An inventory of program assessment and specialized accreditation

2. The Voluntary System of Accountability (VSA) plus program review

3. A statement of claims for student achievement with supporting evidence

4. A comparison to peers on measures of student achievement and success (p. 1)

For the S-series, institutions provide data on retention and graduation rates as well as other measures that fit with the institutions' missions. Institutions are given forms for documenting information and these are filed as part of the fifth-year report and the ten-year comprehensive review. This initiative is meant to be "mission-sensitive"—that is, the types of information collected would allow a diverse set of institutions to demonstrate success. NEASC hopes the initiative will promote creativity as well as institutional improvement (2009, p. 10) and in this sense is trying to provide some flexibility while also offering a clear structure.

HLC has two programs that guide the approach to student learning outcomes assessment. The first, Academic Quality Improvement Program (AQIP), serves as an alternative to the self-study process and aims to improve institutional quality through the initiation of a continuous improvement cycle. AQIP institutions are "part of an intensive, collaborative effort to reshape their cultures and to make a commitment to continuous quality improvement their constant focus" (NCA-HLC, 2008, p. 244). Assessment is a key function of the AQIP process. Institutions participating in AQIP must "measure student learning—

All regional accreditors agreed that institutions should embed the assessment process in activities already taking place on campus.

and use the results to improve teaching and learning processes as well as all other institutional processes that contribute to student learning" (p. 244). In AQIP's "helping students learn" category, an institution must "address specific questions about its teaching-learning processes, about the performance of these processes, and the way the institution uses results data to improve" (p. 244). AQIP institutions create at least three "action projects"—reviewed annually—focusing on institutional improvement, one of which addresses student learning assessment.

A second HLC approach to outcomes assessment is its Academy for Assessment of Student Learning, launched in 2006, which includes a "four-year sequence of events and interactions focused on student learning, targeted at accelerating and advancing efforts to assess and improve student learning, and designed to build institution-wide commitment to assessment of student learning" (NCA-HLC, 2008a, p. 251). Institutions in the HLC can participate in this academy to fulfill accreditation requirements related to student learning, to address mandates related to insufficient student learning outcomes assessment information, or to implement one of the AQIP action projects (p. 251). Institutions send teams to create an "action portfolio," to attend workshops, and to receive feedback on their portfolios. In the end, institutional teams write a "results report," and the academy compiles the publications as a "showcase of accomplishments and inventory of good practices" (p. 251).

The SACS Quality Enhancement Plan (QEP), in contrast, is mandatory for all institutions in that accreditation organization's region. A QEP must be submitted that (1) includes a broad-based institutional process identifying key issues emerging from institutional assessment, (2) focuses on learning outcomes and/or the environment supporting student learning and accomplishing the mission of the institution, (3) demonstrates institutional capability for the initiation, implementation, and completion of the QEP, (4) includes broad-based involvement of institutional constituencies in the development and proposed implementation of the QEP, and (5) identifies goals and a plan to assess their achievement (SACSCOC, 2007, pp. 6 & 19). The SACS QEP plans are followed by a peer visit that may include an assessment expert who consults with the institution concerning its QEP (personal communication, July 10, 2009). Even though this QEP process does not prescribe an assessment method, it does have clear expectations with respect to student learning outcomes assessment.

Very similar is the process for Western Senior, which divides the visits into three phases: the proposal, a capacity visit, and an educational effectiveness visit. Student learning outcomes assessment threads throughout these three phases and all parts of the visits. Institutions are asked questions from Western Senior's rubric: Educational Effectiveness Framework: Capacity and Effectiveness as They Relate to Student and Institutional Learning. This rubric outlines Western Senior's standards and gives the peer reviewers a framework from which to judge the institution. For example, an element and definition reads: "Student learning outcomes established; communicated in syllabi and publications; cited and used by faculty, student affairs, advisors, others" (WASC-ACSCU, n.d., p.1). If classified in the initial stage for this item, an institution may have only a few programs listing their student learning outcomes and minimal knowledge or use of them across the campus; in the emerging stage, many programs would list this information in basic documents beginning to be used; in the developed stage, all programs would have established outcomes known and used by most programs; and in the highly developed stage, all programs would share such information that faculty and others would use widely and routinely. Western Senior provides further guidance with similarly structured rubrics, which are available for program learning outcomes, portfolios, capstone activities, program reviews, and general education assessment.

Overall, while the regional accreditors have similar expectations, they are experimenting with different assessment strategies and with the accreditation process itself.

Every regional accreditation organization is careful not to prescribe a single method or tool for assessing learning outcomes. Rather, they tend to value and respect the diversity of academic missions and institutions in their region and the need for the assessment process to reflect these variations. In most instances, regional accreditors encourage evidence drawn from multiple measures embedded in existing activity, processes, and issues on campus.

Transparency and Integrity

Several commission representatives mentioned that transparency and learning outcomes assessment rose to the fore in the wake of the Spellings' Commission report and the reauthorization of the Higher Education Act. In this current climate, grade-point averages, graduation rates, alumni surveys, and such are all important but not sufficient in the eyes of critics. Additional information is being requested and several national organizations are addressing transparency. While the regional accreditation organizations support those initiatives, representatives from the HLC and NEASC mentioned that templates such as that of College Portrait of Undergraduate Education (http://www.collegeportraits.org/) do not provide enough information on student learning outcomes. Even so, at this point, the majority of commissions ask institutions to be more transparent through their integrity standards and not through student learning outcomes standards. Each regional accreditor is addressing transparency with slight variations. Most assert that transparency is a part of institutional integrity and that campuses should be able to show what students will learn. Others— for example, Western Senior—appear to take a stronger approach and call for institution-wide assessment information, not merely course/program expectations, to be made public.

Western Senior expects public disclosure of information, stipulating that the institution "demonstrate" the achievement of its graduates (WASC-ACSCU, 2008, p. 15) and "[make] public data on student achievement at the institutional and degree level, in a manner determined by the institution" (p. 11). A Western Senior task force on transparency and accountability issued a report in October 2009 providing additional guidance on the transparency standard and expanding on the importance that institutions deliver "current and easily accessible data about student achievement" to various higher education stakeholders (2009, p. 5). To that end, the task force provided recommendations on what kinds of information institutions might publish and where it might appear. A commission representative pointed out that "WASC Senior is requiring some degree of disclosure, but what or how the institutions disclose is not mandated" (personal communication, July 17, 2009).

The issue of transparency actually appears to present itself at two levels in accreditation. While this study focuses on transparency as a requirement for institutions to post their assessment information publicly, an animated discussion occurred at C-RAC-NILOA's "Symposium on Student Learning Outcomes Assessment" about whether institutional self-studies should also be available to the public. During that discussion, Douglas Bennett, president of Earlham College, said, "If we are going to stand behind accreditation as our quality assurance mechanism, we cannot hide that information; we have to make it available." Bennett reiterated this sentiment in his Inside Higher Ed editorial (Bennett, 2010). While some accrediting organizations said they encourage institutions to publish such information, others said it "deteriorates the self-study process if [accreditors] make it public" because institutions may feel compelled to highlight only areas where they are doing well. In contrast, if assessment results are not accessible to interested parties on and off the campus, then institutions can be more honest about what is happening on campus and describe their shortcomings—as well as their successes.

At this point, the majority of commissions ask institutions to be more transparent through their integrity standards and not through student learning outcomes standards.

Faculty Involvement

To address the role of faculty in learning outcomes assessment, most of the regional accreditors articulate expectations for faculty involvement in assessment in their standards. SACS expects faculty involvement but does not directly state this expectation in its standards, but the standards of all of the other accreditors stipulate faculty involvement. While representatives from MSCHE, NEASC, HLC, and Western Junior (WASC Accrediting Commission for Community and Junior Colleges) said they do not perceive institutions struggle to meet this requirement, common accreditor expectations for faculty involvement include that faculty (a) define the learning outcomes or goals, (b) decide on ways to evaluate those stated goals, and (c) create plans for using assessment results for improvement. NEASC and Western Senior both illustrate strong expectations for faculty involvement.

In NEASC's standards faculty have a key role in the understanding of how students learn and assessment is a key measure of teaching and learning effectiveness. Expectations for faculty with regard to learning outcomes assessment can be found in three areas of these standards. First, faculty must have a "substantive voice in matters of educational programs, faculty personnel, and other aspects of institutional policy that relate to their areas of responsibility and expertise" (NEASC, 2005, p. 6). Next, faculty are directly involved with "understanding what and how students are learning and using the results for improvement has the support of the institution's academic and institutional leadership and the systematic involvement of faculty" (p. 13). Finally, faculty have a responsibility for the "instruction and the systematic understanding of effective teaching/learning processes and outcomes in courses and programs for which they share responsibility" (p. 14).

In the case of Western Senior, the role of faculty is considered in the commission's capacity and preparatory review, in which representatives ask, "Do faculty have resources and support to assess and improve student learning and success?", as well as in the educational effectiveness review, in which representatives ask, "How do the faculty demonstrate responsibility for assessment and improvement of learning?" (personal communication, July 17, 2010). Additionally, a nonmandatory guideline in the Western Senior standards states, "Where appropriate, the institution includes in its policies for faculty promotion and tenure the recognition of scholarship related to teaching, learning, assessment, and co-curricular learning" (2008, p. 15).

Despite calling for faculty involvement, all regional accreditation standards are weak in respect to means of assuring such involvement. During the interviews several of the regional accreditation representatives suggested that faculty involvement is not an issue. However, the 2010 NILOA survey, in contrast, found faculty involvement listed most often by provosts as the biggest challenge to overcome to effectively assess student learning outcomes. Even though faculty are seen as playing a part in the assessment process, C-RAC-NILOA symposium participants said more needs to be done to encourage the involvement of faculty in assessment because they are central to the teaching and learning process. One regional accreditation leader said it would be good to know more about what would make assessment worthwhile to the faculty— for a better understanding of the source of their resistance.[6] Currently, it appears that the requirements for regional accreditation serve as an incentive, or driver, for campus administration seeking ways to gain faculty involvement and support.

Institutional Shortcomings

While the assessment of the quality of academic programs is a central function of higher education institutions as well as of accrediting organizations,

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[6] Pat Hutchings (2010) provides some insight into the issue of faculty involvement with learning outcomes assessment.

learning outcomes assessment is only one of many areas in which colleges and universities are reviewed for accreditation. Accreditors tend to review the institutions in their regions for reaccreditation on a ten-year cycle, with Western Junior being the exception.[7] These reviews typically include a self-study report from the institution and a visit by a team of peers from other campuses. Following the peer team visit, institutions receive a preliminary report, a final report is developed, and the commission makes its ultimate accreditation decision. Institutions often receive recommendations or requirements for follow-up actions and reports, and accreditor representatives noted that follow-up requirements often focus on issues of student learning outcomes assessment and that many institutions have not met the enhanced expectations. In some cases, institutions respond by writing additional reports focusing on assessment or they receive additional campus visits. Notably, increasing numbers of institutions may not receive the ten-year reaccreditation "seal of approval" but a shortened approval instead. While to date no institution appears to have lost its accreditation solely because of student learning outcomes assessment deficiencies, increasing numbers of institutions are being required to address such issues as institutions are being placed on probation or are receiving follow-up requirements—with learning outcomes assessment as one of the main reasons, if not the sole reason.

About two thirds of MSCHE institutions, for example, were asked for follow-up actions because of assessment (personal communication, July 30, 2009). While some institutions have follow-up reports, others receive additional team visits. NEASC reported that 80% of its institutions had been asked for follow-up actions related to assessment—either in the fifth year or during the comprehensive visit—and that the number of such actions is increasing (personal communication, July 29, 2009). If an institution understands assessment expectations and is progressing with its assessment activity, a commission may simply ask for a progress report—say, in five years. An HLC representative explained that, currently, "Very few institutions get by without strong language on assessment" (personal communication, July 7, 2009). In fact, in a study completed in 2005, seven out of ten of its institutions received some sort of monitoring, with the vast majority of the follow-up focused on assessment of student learning (personal communication, July 9, 2009). In July 2009, HLC reported that 60% of focus visits, 30% of progress reports, and 40% of monitoring reports involved assessment of student learning; and among follow-ups, assessment was among one of the three most common points of attention.

Most of the recommendations for follow-up issued by SACS relate to its "Standard of Institutional Effectiveness." In December 2008, more than half of all requests received by institutions for follow-up were focused on assessment of learning outcomes. In the last few years, 63% to 78% of the SACS institutions up for review have received follow-up recommendations with regard to the QEP standard (personal communication, July 10, 2009).

At Western Senior, almost every action letter to institutions over the last five years has required additional attention to assessment, with reasons ranging from insufficient faculty involvement to too little evidence of a plan to sustain assessment. While institutions have not received "warnings," Western Senior has issued formal notices of concern, granted shorter terms of reaccreditation, and issued prescriptive action letters. A commission representative stated during an interview, "No institution with weak assessment in the last couple of years has gotten any more than seven or eight years even if everything else is perfect" (personal communication, July 17, 2009).

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[7] The institutions in the WASC Junior region are all two-year associate degree granting institutions, so the policy for this commission is to review the institutions on a six-year cycle because the time for students moving through the program is shorter (personal communication, July 17, 2009).

Western Junior, in contrast, will not sanction institutions for student learning outcomes assessment deficiencies until 2012, under the assumption that institutions will need time to "come into full compliance with the new standards" created in 2002 (Barbara Beno, memorandum, June 25, 2009). Even so, institutions are expected to be increasing their efforts in assessment to be in compliance in 2012 and beyond. Communications issued by Western Junior now often state that the "institution has made progress but needs to accelerate to get to speed by the 2012 deadline" (personal communication, March 16, 2010).

The six accreditation organizations that participated in the interviews provided access to accreditation letters relating to student learning outcomes assessment. These letters cited various factors explaining why institutions were receiving follow-up action with accreditors. For instance, an institution might need to establish clear learning goals, to continue to develop and implement the assessment process, to use evidence for improvement, and/or to gain more faculty support. While all regional accreditors are increasing the rigors of assessment and requiring greater compliance, the letters also point to successful examples of learning outcomes assessment at program level and even at institutional level. Successful campuses, according to the accreditors, are ones that have clearly stated outcomes and that provide evidence of robust and sustainable program evaluation systems, using multiple assessment measures aligned with learning goals, with high levels of faculty involvement, and using results to improve the academic program.

Each of the regional accreditors interviewed appeared to have raised expectations for the institutional assessment of student learning outcomes. At the same time, each of them appears to view outcomes assessment as a work-in-progress, treating assessment more as a means to improvement than as a narrowly defined approach to quality control and accountability.

Assessment Resources

Regional accreditation organizations offer several different types of resources to member institutions to assist in meeting the student learning outcomes assessment challenge. For example, assessment information and resources are made available on commission websites, workshops and special sessions are offered for members at annual meetings, and experts on assessment are often placed on peer review teams. Although the standards often provide a statement of threshold expectations for assessment, the supplementary materials and resources provide support and information to guide and enhance member institutional assessment efforts. Most accreditation organizations provide information on learning outcomes assessment online. Particularly robust is MSCHE's website, which links C-RAC documents, bibliographies, its own documents about student learning outcomes assessment (e.g., Fundamental Elements of Assessment of Student Learning and Optional Analysis and Evidence), and information on assessment workshops. While websites present one venue for disseminating resources on assessment, workshops and annual meetings offer another significant resource. Annual meetings often model good assessment practice and provide networking opportunities for institutions to share assessment practices.

Two commission programs deserve particular comment in respect to providing assessment resources for institutions: The HLC's Academy for Assessment of Student Learning and Western's Assessment Leadership Academy. The HLC's academy seeks to create an "institution-wide commitment to assessment of student learning" (NCA-HLC, 2008a) by giving institutional teams a chance to work on assessment projects they are trying to implement on their campuses and by connecting the teams with mentors who have led successful efforts on their own campuses. Academy participants are required to make a four-year

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commitment to an assessment project, checking in with the academy at least annually and ultimately reporting results. Western's Assessment Leadership Academy is geared more toward increasing the assessment capacity of individuals, with a goal of creating assessment leaders in the region. This nine-month program, which began in March 2010, offers roughly 30 participants an intensive course of study in the field of assessment involving multiple convenings in the course of a year (including one of a week's duration) in the hope that they, in turn, will train others, act as consultants, and/or contribute to the scholarship on assessment.

Several of the regional commissions—for example, MSCHE, HLC, NEASC, and Western Senior—employ individuals with national reputations in the field of assessment. Most of these individuals were hired in the last ten years with the purpose of augmenting and improving resources for student learning outcomes assessment. In addition, some commissions—such as MSCHE, SACS and Western Senior—send a peer evaluator with an assessment background on campus visits. These experts are typically those who have led successful assessment initiatives at their own campuses.

The nature of the assessment support accreditors provide appears to have evolved over the years as the questions and challenges related to assessment have evolved. Representatives of MSCHE, HLC, and Western Senior mentioned during interviews that when their organizations first started offering workshops they dealt with very basic questions from institutions, such as "What is assessment?" Now, institutions are asking, "How do we use the data?" These current questions are not likely to have formulaic answers and often need to be considered in relation to the concerns of specific campuses. Representatives from more than one accreditation agency indicated their organization shies away from directly presenting information at workshops so that institutions do not just do "what the accreditor wants" but instead seek out what is relevant for the institution.

Recommendations

What insights can be drawn from this overview of approaches to learning outcomes assessment in the seven higher education accreditation regions? I offer five possibilities to advance student learning outcomes assessment.

Communicating Institutional Initiatives on Student Learning

One possibility is for the higher education community to take more initiative in addressing issues of quality assurance, allotting particular attention to learning outcomes assessment. Federal policy actions have often prodded and shaped expectations for learning outcomes assessment. Molly Broad, the current president of the American Council on Education, speaking at the HLC's 2010 annual meeting, addressed the need for institutions to self-assess student learning:

> To the extent that federal policy makers are now willing to bail out banks and other financial institutions, and to take major equity positions in our auto makers, because those companies are too big to fail, then I believe it's wise for us to assume they will have little reservation about regulating higher education now that they know it is too important to fail. (Lederman, 2010, ¶5)

In response to her assertion, Lederman asked, "But where will such large-scale change come from? The regional accreditors acting together to align their standards?" (¶18). Regional accreditors have certainly become the focus of a national debate on assessment, intensified by the Spellings' Commission and the Reauthorization of the Higher Education Act. Still, disciplinary and professional societies and the higher education community in general can shape the learning outcomes assessment movement in constructive ways.

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Although accreditation groups are loosely linked through their membership in C-RAC, the Council for Higher Education Accreditation (CHEA), and other groups, the national trajectory for learning outcomes assessment is not well enough defined or articulated, nor does it engage the intellectual energy of campuses and academic leaders. More must be done to engage the broader higher education community in the search for more useful approaches to learning outcomes assessment and to communicate those efforts.

Gaining Faculty Involvement

To engage faculty members in learning outcomes assessment, institutions should search for ways to collaborate with disciplinary and professional organizations. Most faculty members want to improve their courses and the curriculum for students; many are already deeply involved in such work. At the same time, faculty members too often tend to perceive assessment as an additional administrative chore. Faculty involvement in learning outcomes assessment will require a shift in the direction of viewing assessment as a form of "scholarly, intellectual work" (Hutchings, 2010). While Western Senior does provide a "guideline" suggesting that institutions reward faculty for investing time in assessment, the standards in that region and others should consider addressing the question of faculty involvement more fully—so that assessment is valued by faculty members.

Seeking Meaningful Transparency

Increased transparency is important for a number of reasons. Most often thought of in terms of "accountability," transparency is also useful as a way of sharing new and innovative approaches to learning outcomes assessment and best practices within an institution, with the public, and with policy makers. How to share assessment information publicly—to make it transparent without compromising the assessment process—is the challenge (Kuh, 2007). Both accreditors and institutions need to consider fully what to share with the public. Accreditation organizations must carefully weigh the benefits of making the accreditation process more public against the need for institutions to make honest, objective, and useful self-assessments of performance. Understanding how to move forward with this transparency issue requires more attention from all stakeholders.

Achieving Purposeful Investment in Assessment

Too often, assessment is reactive, sporadic, unfocused, and unproductive. Assessment should be proactive, focused on meaningful issues and questions, used to improve teaching and learning, and sustained over time. While it is true that institutions are receiving more follow-up requests from accrediting groups than previously related to student learning outcomes assessment, the reporting process and the follow-up processes and visits are expensive in terms of money and faculty/staff time. Given the scarcity of institutions' resources, institutions need to regain the initiative and become proactive in defining an approach to learning outcomes assessment that is sustainable as well as useful in decision making.

Using Institutional Resources Productively

Although much has been done over the last decade, higher education institutions need more support in building assessment capacity. Accrediting groups are working to build capacity on campuses and shaping the dialogue around assessment nationally. Still, there are too few venues where faculty members and academic leaders can get assistance in scaling up assessment capacity and too few resources are available for institutions to learn about assessment. Some national organizations—like the Association for Institutional Research (AIR) and Student Affairs Administrators in Higher Education (NASPA)—provide training workshops and conferences, and some conferences centering on student learning outcomes assessment have been developed (Assessment Insti-

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tute). In April 2010, the Association for the Assessment of Learning in Higher Education (AALHE) was formed as a professional association for those interested in assessment. Some regional and specialized accreditors have developed training processes to fill the void and others have offered opportunities for institutions to learn from each other through networking. Yet the question remains: Is enough help being provided? A national initiative building on the resources of all of the regional and specialized accreditors to provide more assessment resources and training would be a very constructive step forward.

Conclusion

Accreditors have moved away from a rear-view-mirror, retrospective glance at what is happening on campuses toward an effort to gain a deeper understanding of what students know and can do as a result of their academic experience. Part of this shift is toward understanding how assessment is embedded in the institutional culture. The findings from this study show that there is a degree of consistency across the seven accreditation regions in terms of accreditor requirements for student learning outcomes assessment, while at the same time expectations concerning student learning outcomes assessment continue to evolve. The sources of the consistency across the regions need to be more clearly articulated, and ongoing discussions between the regions are necessary for such an advance.

Accreditation has undeniably had a demonstrable influence on moving campuses' assessment initiatives forward. The accreditor representatives who attended the C-RAC-NILOA symposium on student learning outcomes assessment took seriously the challenge of assessing student learning outcomes. They also agreed, however, that while the accreditors may be major drivers for assessment, it would be far better for institutions themselves, as part of their cultures, to drive student learning outcomes assessment—to create a space for quality improvement independent of the pressures for accountability.

Accreditors have moved away from a rear-view-mirror, retrospective glance at what is happening on campuses toward an effort to gain a deeper understanding of what students know and can do as a result of their academic experience.

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NILOA Mission

NILOA's primary objective is to discover and disseminate ways that academic programs and institutions can productively use assessment data internally to inform and strengthen undergraduate education, and externally to communicate with policy makers, families and other stakeholders.

NILOA Occasional Paper Series

NILOA Occasional Papers are commissioned to examine contemporary issues that will inform the academic community of the current state-of-the art of assessing learning outcomes in American higher education. The authors are asked to write for a general audience in order to provide comprehensive, accurate information about how institutions and other organizations can become more proficient at assessing and reporting student learning outcomes for the purposes of improving student learning and responsibly fulfilling expectations for transparency and accountability to policy makers and other external audiences.

Comments and questions about this paper should be sent to niloa@education.illinois.edu.

About NILOA

- The National Institute for Learning Outcomes Assessment (NILOA) was established in December 2008.
- NILOA is co-located at the University of Illinois and Indiana University.
- The NILOA web site went live on February 11, 2009. www.learningoutcomesassessment.org
- The NILOA research team has scanned institutional websites, surveyed chief academic officers, and commissioned a series of occasional papers.
- One of the co-principal NILOA investigators, George Kuh, founded the National Survey for Student Engagement (NSSE).
- The other co-principal investigator for NILOA, Stanley Ikenberry, was president of the University of Illinois from 1979 to 1995 and 2009 to 2010. He also served as president of the American Council of Education from 1996 to 2001.
- Peter Ewell joined NILOA as a senior scholar in November 2009.

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