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August 2, 2013

The Honorable John Kline
Chairman
Committee on Education and the
Workforce
U.S. House of Representatives
Washington, DC 20515

The Honorable George Miller
Ranking Member
Committee on Education and the
Workforce
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Kline and Ranking Member Miller:

Thank you for soliciting responses from the public as you and your colleagues prepare to reauthorize the Higher Education Act (HEA). The Association of American Universities (AAU), an association comprising 60 of this nation's leading research universities, appreciates this opportunity to offer its views. AAU member universities educate more than 1.1 million undergraduate students and 560,000 graduate students annually. Along with our own recommendations, AAU endorses those included in the community-wide letter prepared by the American Council on Education (ACE).

In your joint letter of invitation, you asked for ideas and recommendations on ways to: empower students as consumers in higher education; simplify and improve the student aid and loan programs; increase college accessibility, affordability, and completion; encourage institutions to reduce costs; promote innovation to improve access to and delivery of higher education; and, balance the need for accountability with the burden of federal requirements.

AAU believes that the areas in which you seek comments are important to discuss and consider during this reauthorization process. We believe these issues are interrelated, and their impact on each other should be examined as a package. They should not be viewed as discrete concerns nor should they be considered in isolation.

As a fundamental guiding principle, AAU is committed to the notion that students who wish to pursue a higher education should not be denied an opportunity because of economic circumstances; a student's financial status should not be a barrier to higher education. At the same time, we believe that access should be coupled with the goal of completion of a strong education program. Simply enrolling students at an institution that provides little or no educational benefits for its students should not be the objective of the federal government. In the context of the HEA, we hope that Congress will promote policies that lead to greater levels of access and greater levels of student success.

Access to Higher Education: Historic Goal of HEA

With its historic enactment of the HEA in 1965, the federal government proclaimed that providing access to higher education for all qualified students, regardless of their individual financial circumstances, benefits the entire nation. Since then, in a bipartisan manner, each successive Congress and Administration charged with reauthorizing the Act has reaffirmed the principle of access to higher education as *a* fundamental, if not *the* fundamental, objective of the government with respect to policies concerning postsecondary education. *As this Congress begins to assess the myriad parts of this statute, AAU requests that all parties involved reaffirm this historic principle.*

For over 40 years, the Pell Grant program has served as the cornerstone upon which the federal financial aid system has been built. AAU believes the program is working in the manner in which it was intended and is a testament to the vision of its creators and supporters. Pell has served, and continues to serve, as the gateway to higher education for millions of students. The program has demonstrated its value and importance over the years, especially during the recent economic downturn, as an unprecedented number of students qualified for Pell grants to pursue a postsecondary education. Next year alone, the program is expected to help approximately 9.3 million students.

Working with Pell is the full array of other federal student aid programs designed to increase access to higher education, including the campus-based programs – Supplemental Education Opportunity Grants, Federal Work-study, and Perkins Loans. Along with Pell, they offer eligible students a set of options to help finance their education. *We ask that you also reaffirm your commitment to these critical programs that not only enhance access to higher education, but empower educational choices for students.*

As federal resources have grown scarce over the last several years, legitimate concerns about fraud and abuse in the federal student aid program have arisen. We urge Congress to take strong steps to address fraud and abuse in student aid programs to help ensure that the integrity of federal student aid programs is not jeopardized by unscrupulous entities. We are ready to engage with you on this important issue.

While the federal government has the primary responsibility to provide access to higher education, state governments also have a responsibility to make college accessible. It is regrettable that many states have backed away from their commitment to support public higher education, especially in the past decade. The State Higher Education Executive Officers Association (SHEEO) noted that nationally, on average, states reduced their per full-time equivalent (FTE) student support by 3.2 percent between FY2005 and FY2010; at the same time, enrollment on an FTE basis rose by 14.9 percent. Therefore, even as enrollments have increased, the support for students has not kept pace. SHEEO added that, while tuition accounted for 29.3 percent of revenues in public higher education across the country in 2001, that figure had increased to 40.3 percent by 2010. The organization pointed out that there is a direct correlation between the level of state support and the reliance on tuition revenue – the lower the level of state support, the greater the reliance of universities on tuition as a revenue source. States must recommit to supporting higher education if access to (and affordability of) higher education is to be ensured in the future. The federal government alone cannot address all the challenges facing higher education.

Tuition Prices and College Affordability

Universities and colleges also have a role in keeping higher education accessible and affordable. Institutions around the country are taking serious steps to keep their net prices affordable and reduce their operating costs, and we cite a number of examples below. We also hope that Congress will recognize the steps that individual institutions are making to provide institutional aid to students.

Both the public and policymakers are justified in their concerns about rising published tuition prices. Rising published tuition prices are attributable to a host of factors, including states disinvesting in higher education, the labor-intensive nature of higher education, the increasing cost of the tools and materials used in instruction, and increased government regulations. Although the average net price was \$2,910 at four-year public institutions and \$12,540 at four-year private non-profit institutions in 2012-2013—considerably less than the published tuition rates—we agree that increases in published prices can negatively affect perceptions of the accessibility to and affordability of higher education.

AAU institutions are committed to reducing their operating costs and increasing institutional student aid while making the investments necessary to providing the highest quality education. For example, a private university member of AAU was able to save \$19.8 million as a result of a salary and hiring freeze in FY2010. The University of Illinois has launched a series of information technology initiatives, such as server room consolidation, unified communications services (which includes VOIP phone service), and other measures, which are expected to result in over \$11 million in annual savings. By investing in energy savings projects, Princeton University expects to save \$8.5 million annually. Sometimes, savings materialize through changes to and consolidations of academic offerings. For example, the University of Arizona has recently closed, merged, or consolidated 58 programs and 53 departments, eliminated one college altogether, and consolidated four colleges into one.

In order to make higher education more affordable, AAU's 60 U.S. institutions collectively provided \$1.25 billion in institutional aid to first-time, full-time students in 2010-2011. This figure represents an increase of nearly three-fold over the \$451 million that AAU institutions offered in 1999-2000. At the individual institution level, Duke University, for example, increased its institutional aid by 60 percent during a five-year period ending in 2011. Twenty percent of the University of Michigan's endowment is devoted to direct student financial aid. In 2008, Brown University instituted a new financial aid policy that led to the elimination of parental contributions from families earning less than \$60,000 and the elimination of loans for families with incomes of less than \$100,000. Vanderbilt University provided more than \$36 million in institutional aid in 2011-2012. For California families whose gross income ranges from \$80,000 to \$140,000, the Berkeley Middle Class Access Plan at the University of California, Berkeley caps the contribution parents make toward the annual cost of a student's education at 15 percent of their total income. In addition, a number of AAU institutions have adopted aid policies that award all grant aid (no loans) to meet the full need of their students.

As Congress considers ways to address the legitimate concerns about rising published prices and college affordability, we ask that you proceed with care. AAU universities are taking serious steps to restrain prices and maintain affordability, and we believe that any federal policies pertaining to college affordability should take into account the appropriate federal and state roles and acknowledge the steps that institutions have already taken.

Useful Consumer Information

Access to higher education is not determined by financial resources alone. AAU believes that access to *useful* and *helpful* information about individual colleges and universities can provide valuable assistance to students, families, and policy makers in their decision-making processes. On the other hand, simply providing more information that is not germane to the needs of students and families serves little purpose.

Since enactment of the disclosure and reporting requirements contained in the Higher Education Opportunity Act of 2008, many AAU institutions have established sophisticated internal processes designed to collect, interpret, analyze and provide to the Department of Education myriad data, much of which may not be used in an effective manner. The information sought by the Department may be

obtainable, but the sheer abundance of the data requested is overwhelming and the usefulness of much of it is questionable. For example, the institutional data about students, which universities are required to collect, vet, analyze and confirm before submitting to the Department, include mandates to break out the diversity of the student body by multiple categories, including race, age, gender, Pell grant eligibility status, nationality, impediments to learning, previous run-ins with the law, financial situation, and, of course, retention and completion rates.

We agree that the current federal graduation metric is incomplete for a host of well-known reasons. To address some of the shortcomings in the current system, a number of alternative measures have been or are being developed voluntarily. These alternatives seek to paint a more complete picture of student persistence and progress. *As the voluntary efforts progress, we ask that the Department and Congress evaluate the results of these efforts to determine whether more useful and appropriate federal metrics can be adopted in the future.*

Before creating and launching new data collection efforts, Congress should ensure that any new information collected will actually be useful to consumers and policymakers. *We request that Congress require the Department of Education to evaluate the usefulness of current consumer information provided by the federal government in order to better assess what new information the federal government or institutions could provide to students and their families.*

Student Progress/ Completion

While we re-emphasize our support for providing access to higher education as a fundamental objective of federal higher education policy, the nation cannot and should not be satisfied with access alone. We believe that the public and policy makers are justified in their desire to see students make progress through the higher education pipeline. We must also ensure that students are obtaining degrees which will serve them well into the future.

The goal of the HEA is to provide access to an opportunity to pursue a quality higher education, leading to a degree or a certificate. AAU institutions take this attainment seriously; the federal six-year graduation rate of AAU institutions is 80.1 percent (for first-time, full-time students). AAU also believes that no single model or approach to increasing graduation or progress rates is appropriate for all institutions. We agree with the broader higher education community that federal policy should recognize and support institutional efforts already underway and to encourage new ideas and practices to increase persistence and completion.

Since no one model for increasing persistence is appropriate for all institutions, federal policy should recognize and support institutional efforts already underway and should encourage new ideas and practices to increase persistence and completion. *In order to encourage further innovative practices in promoting completion, we believe Congress should reinvigorate the Fund for the Improvement of Postsecondary Education (FIPSE) program. In addition, expanding the “experimental sites” program to include more institutions could prove an effective way to incentivize more universities to take additional measures to facilitate student progress.*

Accreditation

In recent years, accreditation—its purpose, the players involved in the process, and the actual process of accrediting institutions—has become a significant point of contention among those within and outside of higher education. To some, accreditors are not doing enough with respect to quality control. To others, accreditors are doing too much. At many of our member universities, accreditors are imposing high costs on institutions with a long record of success without any commensurate benefit for students.

Moreover, accreditors are imposing bureaucratic requirements that diminish the ability of these institutions to provide quality programs that evolve with changing needs and prepare their students to lead meaningful and productive lives. These requirements often do not originate with the accreditors but are imposed on them by the Department of Education.

AAU believes that the accreditation process performs an integral and critical role in U.S. higher education. Though far from perfect, accreditation is the process by which quality of higher education is, and should continue to be, evaluated. Accreditation is intended to serve two critical functions: first, it affirms that institutions eligible for federal financial aid meet basic threshold standards of academic quality; second, it encourages institutional self-improvement. A different aspect to the conversation about access to higher education is the question, “Access to *what?*” Different students have different needs, and one of the strengths of the U.S. system of higher education is its diversity of institutions, capable of meeting many different kinds of needs. But access is meaningful only if it is access to an institution that truly has the capability to meet a student’s needs. Accreditation is an affirmation by qualified reviewers that an institution does meet the threshold standards necessary to accomplish its mission.

A hallmark of the U.S. higher education system has been its use of and reliance on an independent accreditation system, a vital leg in the “triad” of federal, state, and higher education mechanisms responsible for ensuring integrity in our higher education enterprise. We reaffirm our continued support for a non-federal tool for determining quality, one that allows for flexibility and informed academic judgment.

Student Achievement

AAU endorses an accreditation system that promotes effective assessment of student achievement in the context of the missions of individual institutions, provides flexibility for institutions with a record of stability and successful performance, and focuses attention on substandard institutions. It is important to note that federal law requires institutions to provide evidence of “success with respect to student achievement in relation to an institution’s mission.” Both aspects of this requirement—the insistence upon achievement and the tailoring to institutional mission—are critically important. The provision of quality education is a fundamental responsibility of all colleges and universities, but both the achievement of that quality and the methods used to measure it will differ depending on the mission of the institution. We affirm our continued support for a non-federal accreditation system that allows for sufficient flexibility to respect differences in both mission and circumstance.

We support a system in which all institutions, working with their institutional accreditors, should be expected to provide evidence of student success in three areas. First, all institutions should demonstrate evidence of student learning. They should be able to describe and evaluate how their students are learning. Second, institutions should be able to document their students’ academic performance; they should be able to define meaningful curricular goals and should have defensible standards for evaluating whether students are achieving those goals. Additionally, consistent with their missions, institutions should be able to articulate how they prepare their students for successful careers, meaningful lives, and, where appropriate, further education. Finally, an absolutely fundamental aspect of the accreditation process is allowing institutions flexibility with regard to the methods for measuring progress towards these goals. The academic community is in the best position to determine how to determine whether the institution-specific goals are being met.

The properties of student achievement evaluation described above have been drawn from a statement on effective assessment of student achievement endorsed by all seven regional accrediting commissions and

the six major national presidential higher education associations. A copy of the statement, “Principles for Effective Assessment of Student Achievement,” is attached.

Some have argued that being accredited should not be a condition for institutional Title IV eligibility. We disagree. The federal government is providing public funds to enable students to pursue an education, and accreditation, properly carried out, is the government’s best indicator that an institution is capable of providing a quality education consistent with its mission. *Institutional accreditation should be maintained as a threshold of quality, but not the only criterion for Title IV eligibility.*

Although we support the continued link between accreditation and Title IV eligibility, we ask Congress to oppose attempts to ask accreditors to take on additional roles at the urging of the Department, including roles for which they are ill-equipped. Accreditors should not be asked to serve as enforcement agents for the Department on unrelated issues. The Department should take direct actions against institutions for infractions.

Expedited Review

AAU believes strongly that, as recommended by the National Advisory Committee on Institutional Quality and Integrity (NACIQI) in its report *Higher Education Accreditation Reauthorization Policy Recommendations*, and the ACE Commission report *Assuring Quality in the 21st Century: Self-Regulation in a New Era*, accreditors should develop and implement expedited review procedures for institutions with a record of stability and successful performance. *To that end, we request that Congress include a provision in the Higher Education Act that would provide unequivocal authority and flexibility to accreditors to design and implement a system of expedited review.*

It is critical that the accreditation system respond differentially to the varying degrees of risk that different institutions present. Risk-adjusted scrutiny is a standard and indispensable regulatory practice. For example, when institutions perform biological research, the safety standards appropriate to the different laboratories vary with the kind of research that is conducted there. Both low- and high-risk biological research may be valuable to society. The regulatory variations recognize that safety investments have to be tailored to the kinds of dangers they are likely to represent.

A risk-adjusted approach would allow accreditors to focus on institutions that present the greatest potential problems while decreasing burdens and costs for well-performing institutions. Most importantly, such a system would serve the interests of students because the accreditors would be addressing and ameliorating real risks to educational quality.

Graduate Education

As an association comprising research universities, graduate education is of particular interest to AAU. To provide some context, in 2010-2011, AAU universities:

- Awarded nearly 28,000 research doctoral degrees, or 46.5 percent of all such degrees;
- Awarded 55.4 percent of all doctorate degrees in science, technology, engineering, and math (STEM), including 61.9 percent of all engineering doctorates, 59.4 percent of all doctorates in math and computer science, and 49.1 percent of all doctorates in the life sciences; and,
- Produced 62.1 percent of humanities doctorates and 60.7 percent of all doctorates in the social sciences.

Graduate and professional education is a vital element of the nation's higher education ecosystem. Graduate and professional students today will be among the leaders, innovators, and problem solvers in medicine and health, energy resources, water and agriculture, high performance computing, law, and many other fields in which new ideas, processes, and technologies will be needed.

Loans for Graduate and Professional Education

Congress was recently engaged in a protracted debate about interest rates on subsidized loans. As different permutations were considered, almost every proposal would have increased the cost to pursue a graduate education. Over the past several years, federal support for graduate and professional students has eroded, including the loss of access to in-school interest subsidies and subsidized loans. We are concerned that programs to support graduate and professional education, including loans, have largely been ignored or used as "pay-fors" for other deserving groups of students. At a time when society needs as many highly educated problem solvers as possible, our nation should foster policies and practices that expand opportunities and support for graduate and professional students. The cost of graduate education borne by students is added to undergraduate debt; a continued reduction in financial aid resources for graduate students will drive away talent this nation will need to maintain its competitive edge.

As a way of making graduate education more accessible, we ask Congress to reconsider the rates and terms of the loans currently available to graduate and professional students during this reauthorization. *We respectfully request that Congress reestablish eligibility for subsidized loans for graduate and professional students. In addition, we ask Congress to decrease the interest rates on loans taken out by graduate and professional student to match the rates for undergraduate loans.*

Javits Fellowships and Graduate Assistance in Areas of National Need (GAANN)

The Javits Fellowships and Graduate Assistance in Areas of National Need (GAANN) programs are the only graduate education grant programs funded by the Education Department. Although authorized as separate programs with separate purposes, Javits has been funded as part of a consolidated GAANN program since FY2012. Both programs support some of our nation's brightest graduate students who are focusing on many of our pressing national priorities. Javits is a fellowship program that directly funds students in the arts and the humanities. GAANN is awarded to institutions and functions as a traineeship program for multiple students at an institution.

We believe that both Javits and GAANN should continue to be authorized as separate programs so they can continue to meet their distinct goals. We look forward to an opportunity to work with Congress to revitalize the funding for these critical programs.

Patsy Mink Fellowship Program

Created by the Higher Education Opportunity Act (HEOA) of 2008, the Patsy T. Mink Fellowship was designed to assist students from under-represented racial groups enter the higher education professoriate. It is imperative that the nation's colleges and universities can draw talented faculty from all sectors of society. *While not yet funded, we believe that the program should be reauthorized to permit future investment.*

Title VI/International Education Programs

The HEA authorizes another suite of programs which AAU believes deserves continued support. We see the interconnected nature of our global society every day. In so many instances, occurrences on the other side of the world are felt almost instantaneously. Global competency, international awareness, and

the nation's ability to develop expertise in the issues and areas studies surrounding these developments are acutely needed.

The array of programs supported by Title VI of the HEA addresses critical national needs in foreign language expertise as well as cultural and historical understanding and contemporary analyses of different world regions. As the main federal program for training in languages and cultures, Title VI plays a strategically important role in ensuring that our nation is able to maintain deep expertise and analytic capacities in less commonly taught languages and culture. For example, the National Resource Centers (NRC) program, the nation's premier source of expertise for research, language, and cultural training in regions identified as of vital importance for economic and security reasons, strives to improve the understanding of such regions. Many AAU institutions have leveraged federal funds to generate additional non-federal resource for the various Title VI programs, thereby increasing their effectiveness and impact.

We ask Congress to reaffirm its historical support for this group of programs, which continue to develop and train the experts our country desperately needs.

Promoting Innovation

In your request for recommendations and suggestions, you asked for thoughts on how to promote innovation in and delivery of higher education. We ask Congress to keep the Department from interfering unnecessarily in the expansion of distance education. While appropriate oversight is needed and welcomed to help ensure quality and integrity, we believe that the Department's original proposal on distance education goes too far and would certainly diminish access to higher education while adding new costs for institutions.

As part of its regulatory package on "state authorization," the Department's proposal on distance education has led to massive confusion for institutions and states alike. To create a more rational and reasonable network of state regulations, a number of different voluntary efforts have been launched by non-federal entities. As a result of these efforts, states, institutions, and regional higher education compacts are now in the process of cooperatively creating and launching a network of reciprocity agreements across the country. When implemented, these agreements will replace the current patchwork of irrational state regulations and also obviate the need for federal involvement.

Although the Department has agreed to delay the issuance of regulations for two years, the Department announced its intention to form negotiated rulemaking committees to address a host of regulatory concerns, including this issue. We believe that the Department should cease the regulatory process on distance education until Congress has had an opportunity to review this matter.

In order to meet the increasing demand for higher education and to meet the changing needs of students, the higher education enterprise is experimenting with and offering new delivery models and technologies, including the development of massive open online courses, or MOOCs. In many instances, AAU institutions have led the way in the development of this movement. While the ultimate long-term outcomes of such ventures are yet unknown, we believe these new models could be helpful in addressing a number of issues, such as student retention and completion and reduced cost. Institutions offering and adopting such creative options should be given the opportunity to test and explore them. *AAU believes that the FIPSE and experimental sites programs could assist institutions in developing creative programs of quality. At the same time, we encourage Congress to be cautious when considering whether to expand federal student aid eligibility to such efforts. We believe that these and other innovative activities should demonstrate that their quality before Congress opens up eligibility for the student aid program.*

Achieving a Balance between Accountability and Regulatory Burdens

We noted at the start that many of the issues you identified were interrelated. Finding the right balance between appropriate levels of accountability and creating unnecessary regulatory burdens touches on a number of issues. AAU member institutions take their responsibility as stewards of federal resources seriously. Regulations not only affect innovation but the finances of institutions and students. AAU supports regulations necessary to protect tax-payer investments and root out fraud and abuse. At the same time, we believe that more regulations that add to the compliance burden but provide no added accountability are a waste of government and university resources. Unwarranted, duplicative, and sometimes conflicting federal regulations cause significant and costly compliance problems. This is especially true for research universities, whose involvement with the federal government is much more expansive than the requirements outlined in the HEA.

In response to a bipartisan and bicameral request from Sens. Lamar Alexander (R-TN) and Barbara Mikulski (D-MD) and then-Rep. Bart Gordon (D-TN) and Rep. Ralph Hall (R-TX) in 2009 to examine the state of American research universities, the National Research Council of the National Academies issued a report on ways to improve the health of research universities and its link to the future of the country. The report recommends, in part, that the federal government “reduce or eliminate regulations that increase administrative costs, impede [research] productivity, and deflect creative energy without substantially improving the [research] environment.”

We recommend that Congress require the Department to ensure that regulations are meeting their goals in terms of performance rather than simply in terms of process. We believe that a regulatory approach that is based on performance-based standards offers institutions greater flexibility to achieve the regulatory goals and would result in a more rational and cost-effective regulatory structure. Similarly, in its report on reauthorization, NACIQI recommended a “substantial modification to the existing statutory and regulatory criteria, and their application, to make them where possible less intrusive, prescriptive, costly and granular while maintaining the essential controls of gatekeeping.”

Although we outlined our concerns about the distance education components of the “state authorization” regulations above, we have additional concerns and questions about state authorization. We recognize that states have a vital role in program integrity and consumer protection. Recent actions by the Department of Education have created confusion and concern among institutions about this critical state role and the validity of the recognition of institutions by various states for purposes of qualifying for federal aid. *To begin to address the confusion about this matter, we ask Congress to work with the Department of Education to provide clear and unambiguous information to institutions and states regarding the Department’s interpretation of law in this area that recognizes the authority of states in this area.*

Closing

AAU appreciates this opportunity to offer our initial thoughts on HEA reauthorization. We know that the legislative process is iterative, and we look forward to working with you as you proceed.

Sincerely,



Hunter R. Rawlings III
President

July 19, 2013

The undersigned national higher education associations and regional accrediting commissions have endorsed the attached statement, "Principles for Effective Assessment of Student Achievement." The statement grew out of a meeting of the presidents of the seven regional accrediting commissions and public and private university provosts. The statement is intended to emphasize the need to assess effectively student achievement, and the importance of conducting such assessments in ways that are congruent with the institution's mission.

We hope that colleges and universities will find this statement useful in evaluating their assessment policies and procedures and that accrediting commissions similarly will find the statement helpful in evaluating their assessment standards. Looking ahead, we believe that the shared principles of this consensus statement can facilitate continued cooperation and collaboration between these two allied sectors of the higher education community.

Higher Education Associations:

American Association of Community Colleges
(AACC)

American Association of State Colleges and Universities
(AASCU)

American Council on Education
(ACE)

Association of American Universities
(AAU)

Association of Public and Land-grant Universities
(APLU)

National Association of Independent Colleges and Universities
(NAICU)

Regional Accrediting Commissions:

Middle States Commission on Higher Education
(MSCHE)

*New England Association of Schools and Colleges
Commission on Institutions of Higher Education*
(NEASC-CIHE)

*North Central Association of Colleges and Schools,
The Higher Learning Commission*
(NCA-HLC)

Northwest Commission on Colleges and Universities
(NWCCU)

*Southern Association of Colleges and Schools
Commission on Colleges*
(SACSCOC)

*Western Association of Schools and Colleges – Accrediting
Commission for Community and Junior Colleges*
(WASC-ACCJC)

*Western Association of Schools and Colleges - Accrediting
Commission for Senior Colleges and Universities*
(WASC-ACSCU)

Principles for Effective Assessment of Student Achievement

Federal law requires that a higher education institution undergoing accreditation provide evidence of “success with respect to student achievement in relation to the institution’s mission.” Both aspects of this requirement—the insistence upon achievement, and the tailoring to institutional mission—are critically important. The demonstration of quality is a fundamental responsibility of all colleges and universities, but both the kinds of quality and the methods used to measure it will differ depending on the mission of the institution.

More specifically, though the exact content of these criteria and the methods for measuring them will differ, all institutions should be expected to provide evidence of success in three domains:

1. Evidence of the student learning experience. Institutions should be able to define and evaluate *how* their students are learning: more specifically, institutions should be able to describe the kinds of experiences that they expect students to have inside and outside the classroom. Relevant evidence may pertain to targets for the kinds of reading and writing assignments that students should complete; levels of personal interaction with faculty members; residential and/or co-curricular components of the learning experience, and other learning experiences that the institution deems relevant to its mission.
2. Evaluation of student academic performance. Institutions should be able to define meaningful curricular goals, and they must have defensible standards for evaluating whether students are achieving those goals. Appropriate methods for the assessment of student work may include, among other approaches, meaningful and rigorous faculty evaluation and grading or external benchmarking.
3. Post-graduation outcomes. Institutions should be able to articulate how they prepare students consistently with their mission for successful careers, meaningful lives, and, where appropriate, further education. They should collect and provide data about whether they are meeting these goals. Relevant kinds of data may include completion rates, job placement rates, levels of post-graduation civic participation, kinds of jobs and vocations chosen, surveys pertaining to alumni satisfaction and success, and data on other post-graduation goals relevant to the institution’s mission.

The accreditation process needs to allow institutions flexibility with regard to the methods for measuring progress toward these goals. It is a mistake to conflate particular means for measuring goals with the achievement of those goals. Measures of all kinds will work best if they are integrated into the teaching and administration of colleges and universities, analyzed on a regular basis, and summarized in the accreditation process.