REGIONAL ACCREDITATION AND STUDENT LEARNING:

Preparing Teams for Effective Deliberation

COUNCIL OF REGIONAL ACCREDITING COMMISSIONS
REGIONAL ACCREDITATION
AND STUDENT LEARNING:

A Guide for
Institutions
and Evaluators

COUNCIL OF REGIONAL
ACCREDITING COMMISSIONS

Middle States Commission on Higher Education
Commission on Institutions of Higher Education of the
New England Association of Schools and Colleges
Higher Learning Commission of North Central
Association of Colleges and Schools
Northwest Commission on Colleges and Universities
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This guide is a companion piece to *Regional Accreditation and Student Learning: Principles for Good Practices*, adopted by the Council of Regional Accrediting Commissions. Its purpose is to provide a framework within which institutions, regardless of regional affiliation, might follow through on a shared commitment to the *Principles*, and thus to give a central focus to student learning as a demonstration of institutional quality. As with the *Principles*, this guide is intended to complement, not supplant, the materials and guidelines prepared by regional commissions for their institutional members. Nor should any inference be drawn that following the suggestions made in this guide will provide sufficient grounds for accreditation, irrespective of the standards of a particular region.

Excellent advice is available currently in the form of resource materials prepared by regional accreditation staff as well as by other experts in institutional and student assessment. These are noted in the form of an indexed bibliography appended to this guide.
Student Learning Principles

Principle 1: The role of student learning in accreditation.
The institution defines educational quality—one of its core purposes—by how well it fulfills its declared mission on student learning.

“Educational quality” refers to the quality of student learning itself, both the extent to which the institution provides an environment conducive to student learning, and the extent to which this environment leads to the development of knowledge, skills, behaviors, and predispositions of value to students and the society they are preparing to serve. Educational quality is measured primarily by evidence of impact on students, while other indicators, such as retention rates, graduation rates, or graduates’ GRE scores, play secondary roles. An institution’s “learning mission” reflects its aspirations for students, and is stated in terms of how students are expected to benefit from its course of study.

The literature on collegiate student learning is remarkably clear on what it takes to produce quality learning. An institution that takes its learning mission seriously and that views the quality of student learning as one of its core purposes:

- is clear and public about the learning outcomes to which it aspires for its students;
- uses these learning goals as well as knowledge about learning as drivers for organizing instruction;
- provides an environment which signals support for student learning at all levels; and
- promotes an atmosphere of critical reflection about teaching and learning.

The most important function of regional accreditation is to assist member institutions in establishing the integrity of the degrees they offer, as indicated by the qualities enumerated above.

Integrity is also reflected by the degree to which an institution aligns its work to accomplish its learning goals. It is neither possible nor desirable in most institutions to organize instructional processes so that all students have equivalent learning obtained in equivalent ways. “Alignment” requires, not learning equivalence, but that an institution’s teaching and learning processes cohere in ways that are meaningful and useful for students.
The institution accomplishes this by:

- setting clear learning goals, which speak to both content and level of attainment;
- collecting evidence of goal attainment using appropriate assessment tools;
- applying collective judgment as to the meaning and utility of the evidence; and
- using this evidence to effect improvements in its programs.

Simply stated, institutions should be able to specify what students should learn and should be able to do. Note that the principle does not state that a single set of learning goals must apply to all students, but rather that these goals should be “appropriate for the certificate or degree awarded.” Once these goals have been set, the institution should identify potential sources of evidence to help determine the extent to which students are learning in ways consistent with these goals. “Evidence” is information that has been deliberately organized to support a claim or to help reconcile competing claims. Contrary to popular belief, a wide variety of data are available as evidence for demonstrating the quality of student learning. A table of potential evidence is given in the Appendix to this guide.

But even the “best” evidence of student learning will not automatically lead to shared value judgments about the adequacy of that learning—and accreditation requires that these judgments be made. Such questions as, “What constitutes learning that is ‘good enough’? Are the standards adequately met?” cannot be avoided. A “standard” is a level of performance against which evidence is compared and judgments about value drawn. Each regional commission has promulgated standards for student learning in a manner that respects diverse learning missions, and so have not forced member institutions to adopt standardized learning goals. Judgments about what constitutes student learning that is “good enough” must therefore depend on how key stakeholders make meaning of the learning evidence presented within a particular institutional context. (See the text accompanying Principle 4 for an elaboration of this point.)

Important as it is for the institution to define learning outcomes and to collect evidence that these outcomes have been achieved, doing so without then taking action to improve the quality of teaching and learning is simply insufficient.
Principle 3: Compilation of evidence.

The institution derives evidence of student learning from multiple sources, such as courses, curricula, and co-curricular programming, and includes effects of both intentional and unintentional learning experiences. Evidence collected from these sources is complementary and demonstrates the impact of the institution as a whole on the student.

Human learning is extraordinarily complex, and even in colleges with clear learning missions and core learning requirements, their impact on each student’s knowledge, skills, and habits of mind will vary. An institution should not only expect multiple learning outcomes, even within the major, but should also expect that its various constituencies will assign different priorities to these outcomes. Therefore, rather than searching for one or even a handful of measures that will accurately demonstrate its educational effectiveness, the better strategy for an institution is to begin with core learning goals, then identify potential sources of evidence that may be used to help determine how well students are learning in ways consistent with these goals. Using multiple methods from multiple sources is much more likely to result in an accurate portrayal.

Assessing the institution’s impact on student learning requires more than looking at the sum total of course-related assessments; the assessment also should include a focus on the interaction of students’ curricular and co-curricular experiences. While a learning outcome refers to student performance at the end of an educational program, “impact of the institution” implies that the institution has caused a change in students. Because student performance is substantially affected by characteristics at entry, outcomes do not necessarily reflect how the institution has affected them. The most effective measures of institutional impact, therefore, are both periodic and longitudinal, taken at various points throughout the curriculum, at exit or graduation, and post-graduation.

Just as evidence of student learning can take many forms, it can also be obtained from many different sources: institutional databases and archival data; documents (policies, strategic plans, fact books, and so forth); surveys and focus groups; results of institutional assessment; sample learning products; licensing and credentialing exams; and student, course, and institutional portfolios. Multiple sources of evidence are best; reliance should not be placed on a single metric.
Principle 4: Stakeholder involvement.

The collection, interpretation, and use of student learning evidence is a collective endeavor, and is not viewed as the sole responsibility of a single office or position. Those in the institution with a stake in decisions of educational quality participate in the process.

A “stakeholder” is anyone with an interest in the institution—that is, anyone who stands to gain or lose by what the institution does. The case presented for accreditation should reflect not only the presumed interests of the regional commission but also those held internally by faculty, staff, and students, and externally by parents and board members.

Identifying interests can be done in several different ways. One approach is to have focused conversations with interest groups on chronic issues and concerns about student learning; another is using the results of an institution-wide survey, such as the National Survey of Student Engagement (NSSE), as a tool for provoking campus discussion about the effectiveness with which the institution is fulfilling its learning mission. Regardless of the strategy chosen, the institution should show evidence of authentic engagement of stakeholders, so that the questions addressed are not limited to those posed by the regional accrediting commission.

Authentic engagement also requires that key stakeholders participate in the interpretation and use of student learning evidence. Questions such as, “What do you make of these data? What is suggested here about how we’re doing as an institution?” encourage reflective thinking before positions become solidified, and promote a richer conversation about important issues. Just as the collection and use of student learning evidence should not be limited to questions posed by accrediting commissions or other external constituencies, neither should the interpretation of student learning data be delegated to those in academic administration or institutional research. Different stakeholders and stakeholder groups will have different value sets; thus, they will arrive at independent, and sometimes contrary, judgments when presented with exactly the same data. The primary purpose of collecting the kind of evidence described in Principle 2, therefore, is to engage the institution and regional commissions in a useful, more informed dialogue about what and how students are learning.

Involving stakeholders in the use of evidence to make changes also maintains their investment in improvement.
Principle 5: Capacity building.

The institution uses broad participation in reflecting about student learning outcomes as a means of building a commitment to educational improvement.

The most significant barrier to the usefulness of accreditation for the institution has been the natural impulse to treat accreditation as a task to undertake as quickly and efficiently as possible, without thinking too much about its long-term potential. This occurs despite the fact that what accreditation agencies really want is evidence that the institution has internalized assessment of student learning, that it collects and uses student learning data as a way to monitor its own quality, and that it does so in a manner befitting its mission and purposes. Institutional qualities most likely to lead to educational improvement include the following:

- A leadership of engagement. Leaders frame issues clearly, put clear choices before the faculty and other stakeholder groups, and are open to negotiation about what will inform these decisions. Leaders also provide incentives for reasonable risk-taking by academic programs.

- A culture of peer collaboration and peer review. Criteria and standards for evaluation—of both faculty and programs—are based on a shared understanding of faculty work.

- Flexible and decentralized evaluation policies. Units and programs are invited to define for themselves the critical evaluation questions, the key stakeholders and sources of evidence, and the most appropriate analysis and interpretation procedures.

- A willingness to make assumptions explicit and to question them. The institution recognizes that asking questions that challenge existing perspectives is central to institutional vitality.

- A recognition that most of the information required to make informed judgments is already available, and that expert knowledge lies mostly inside the institution. A widespread myth exists in colleges and universities that assessment and interpretation of student learning outcomes require comprehensive and standardized assessment instruments, and external consultants to implement them.

- Significant opportunities for critical reflection on student learning data. Faculty members and academic staff are given the time and resources to make meaning of student learning evidence, including opportunities for discourse and an invitation to adopt new and different perspectives on what the data suggest.

- An acceptance of the need for evidence as a tool for decision-making. The institution demonstrates a spirit of reflection and continuous improvement based on data.
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I. Fulfillment of institutional purposes in student learning outcomes

A. Accomplishment of institutional learning goals
   1. What evidence is provided about:
      a. student mastery of program goals and course objectives?
      b. graduates’ mastery of college-level competencies?
      c. employment prospects of graduates?
   2. Does the institution award degrees and certificates based on student achievement of a program’s stated learning outcomes?

B. Demonstration of specific student proficiencies. What evidence exists that students have attained the following:
   1. Developed an inclination to:
      a. understand their values through self-assessment?
      b. consider divergent views?
      c. pursue intellectual interests through structured inquiry?
      d. become intentional learners, purposeful and self-directed in multiple ways? [3]
   2. Developed skills in:
      a. written and oral communication?
      b. scientific and quantitative reasoning?
      c. critical analysis and logical thinking?
      d. analysis and integration of concepts?
      e. ways to identify, access, retrieve, and apply relevant information?
      f. technology appropriate to the program of study?
      g. deriving meaning from experience? [3]
      h. transforming information into knowledge and knowledge into judgment and action? [3]
      i. managing change? [3]
      j. working well in teams? [3]
   3. Gained knowledge and appreciation of:
      a. the complex structure of knowledge germane to an area of inquiry and its interrelatedness to other areas?
      b. aesthetic and ethical dimensions of humankind?
C. Scientific, historical, and social phenomena?

D. The values and histories underlying U.S. democracy? [3]

E. Civic values? [3]

4. Engaged in both broad and deep learning? [7]

5. Mastered competencies for independent learning—a self-awareness about the reason for study, the learning process itself, and how education is used?

C. Certification of learning. What evidence exists that the institution is able to back up degrees awarded with a certification that learning goals have been achieved? [4]

II. Institutional capacity for quality student learning

A. Clear institutional purposes regarding student learning

1. What commitment to learning is evident in the institution’s mission statement?

2. Have discussions been held among key constituents regarding the relevance of the current mission statement to student learning? How have stakeholder interests been incorporated into revisions? [1]

3. How are an institution’s educational mission and goals disseminated to constituencies?

4. What does the institution do to assure that students and prospective students receive clear and accurate information about educational courses and programs and transfer policies?

5. To what extent are the expected learning outcomes of the institution’s programs made public, including to prospective students?

6. How does institutional mission influence curricular objectives, and how do curricula in turn influence course objectives?

7. What is the match between:
   a. attributes of admitted students and the mission and goals of the institution?
   b. the institution’s programs and its mission and objectives?

B. Policies supporting student learning

1. How much emphasis is given to commitment to student learning as part of faculty hiring? [1]

2. What policies and procedures are in place to assure effective instruction?

3. How does the institution support freedom of inquiry for faculty and students?

4. What measures does the institution take to assure equitable access to students?

5. What does the institution do to assure that its services and academic resources afford all admitted students the opportunity to succeed?

6. What information is provided to students to help them make informed choices about their education?
7. In what ways do institutional policies serve the learning needs of adults and other non-traditional learners?
8. How much of an institution’s articulation and transfer policies focus on student learning rather than on content or delivery?
9. What resources are provided to sustain and improve programs and instruction?
10. In the evaluation of faculty, how much importance is given to their effectiveness in producing learning outcomes? What is the role of peer review?
11. What evidence exists that teaching is taken seriously as a scholarly activity? [4]
12. What is the alignment of faculty and staff recruitment, workload, incentive, and evaluation practices with institutional purposes and educational objectives?
13. How often are institutional policies screened for the extent to which they support student learning? [2]

C. Leadership for student learning
1. Does the institution have a visible institutional leader committed to creating a climate for learning? [1]
2. What evidence exists to indicate that this commitment extends beyond rhetoric to actions in resource allocation, policy making, and data-driven decision-making?
3. How does the institution align and coordinate vision, strategy, and planning?
4. How explicit is the process of change and its anticipated impact?
5. Who is involved in institutional planning efforts? What is the extent of their involvement?
6. What support for assessment of student learning is evident by the governing board, senior executive officers, and unit heads?
7. How does the institution determine that facilities and learning resources are adequate to meet student learning goals?
8. How does the institution balance energy focused on accomplishing its stated mission with flexibility to a changing environment?
9. Who in the institution is sufficiently knowledgeable about student learning to provide the leadership required? [1]

D. A quality environment for student learning
1. What does the institution do to provide an environment that:
   a. is actively conducive to student learning—where library, information resources, and co-curricular programs actively support student learning?
   b. serves as a shared learning community in which students are encouraged to explore and express a diversity of ideas and opinions?
   c. encourages personal and civic responsibility as well as intellectual, aesthetic, and personal development for all of its students?
2. Where is a focus on learning evident in key institutional documents, such as the college catalog, program descriptions, and personnel policies? [4]

3. How flexible is the scheduling of learning options and activities, i.e., year-round operation, frequent entry points and flexible exit? [2]

4. In what ways does the institution encourage and disseminate innovations in teaching and learning, and discuss their implications for curriculum and pedagogy?

5. What evidence exists of a “culture of inquisitiveness” about student learning, including:
   a. a need for information and an urgency to act?
   b. a focus on current issues or problems?
   c. a willingness to make assumptions explicit and to question them?
   d. a recognition of the value of past experiences?
   e. opportunities to reflect?
   f. shared understandings that “learning to learn” is as important as what is learned?
   g. support of reasonable risk-taking by academic units?
   h. opportunities to share results of experimentation in learning?
   i. a climate of trust?
   j. widespread generation of, access to, and use of information about student learning?
   k. collective interpretation of information?
   l. an established process for planning and decision making?
   m. tangible rewards for determining what worked and what did not? [8]

6. How much consensus exists across the institution about the importance of documenting and assessing student learning outcomes? [1]

7. In what ways have community resources been tapped to help the institution become more learning-centered? [1]

8. On campuses that are unionized, how consistent are union agendas with a focus on student learning? [2]

E. Adequate resources to support student learning

1. What resources are provided to support educational programs and to facilitate student achievement of program objectives?

2. What does the allocation of resources among programs, units, and individuals reveal about institutional priorities regarding student learning?

3. What kinds of access and training are provided to students so that library and other learning support services may be used effectively and efficiently?

4. To what extent are student support services appropriate to student strengths and needs, reflective of institutional mission, consistent with student learning expectations, and available regardless of place or method of delivery?

5. In what ways do student support services contribute to the
achievement of student learning outcomes?

6. What is the institution’s plan for acquiring and replacing learning resources, including technology, and how is this aligned with educational goals and objectives?

7. What is the alignment between faculty qualifications and the courses they are expected to teach?

8. How much support is provided for evaluation of instructional effectiveness?

9. What resources and programs for professional development are made available to faculty, staff, and administrators and how much are they used?

10. To what extent are these programs based on identified teaching and learning needs?

11. How does the institution ensure that fiscal stability is not attained at the expense of educational quality?

III. Effective teaching and learning practices

A. Curricular design and integration

1. How does the institution identify the varied educational needs of its students, and how does it seek to meet these needs?

2. What evidence is given that educational programs have been developed to promote curricular coherence and integration and synthesis of learning?

3. What evidence exists of coherence, continuity, and integration of students’ educational experience?

4. How does the institution connect its curricula to its defined communities, through such initiatives as development of available field settings, service learning, or similar opportunities for practical student engagement?

5. What is the availability of such co-curricular offerings as out-of-class lectures and exhibitions, study abroad, civic involvement, independent learning and research, and opportunities for informal student-faculty contact?

6. What is the congruence between institutional descriptions of degrees and certificates and program content, degree objectives, and student mastery of knowledge?

7. Does each instructional program have a clearly stated rationale? How do these align with institutional mission and purposes? How public are they?

8. How consistent are curricula with the abilities and scholastic preparation of the students admitted to the programs?

9. To what extent are programs characterized by appropriate breadth, depth, continuity, sequential progression, and time to completion?

10. How consistent are goals, structure, content, and methods of instruction?
11. How diverse are the methods of instruction and points of view to which students are exposed?
12. How much of the evaluation of program effectiveness centers on student learning outcomes?
13. Do programs of study:
   a. include courses and/or activities that stimulate the examination and understanding of personal, social, and civic values?
   b. require faculty and students to use scholarship and/or participation in research?
   c. require intellectual interaction among students and between students and faculty?
14. For the institution’s general education program:
   a. What is the balance it offers among the arts and humanities, sciences, and social sciences, including their relationships to one another?
   b. To what extent does the general education program contain:
      i. a clearly defined statement of philosophy and objectives?
      ii. courses that stimulate the examination and understanding of personal, social, and civic values?
      iii. courses that ensure proficiency in skills and competencies essential for all college-educated adults?
15. How much opportunity do students have to pursue knowledge and understanding through unrestricted electives?
16. What percentage of students’ studies is devoted to general education?
17. For the institution’s professional education programs:
   a. What role do practice communities play in curricular decisions?
   b. How are learning goals linked to professional standards of practice?
   c. How does the institution assure professional competence of its graduates? [6]
18. What strategic relationships, partnerships, and collaborations has the institution forged with employers and other organizations to develop and improve educational opportunities for learners? [5]

**B. Student learning goals**

1. Are expected student learning outcomes articulated at the course, program, and institutional levels?
2. Are these outcomes articulated in a developmental way—that is, expressed at beginning, intermediate, and advanced levels? [4]
3. Does each program have learning objectives, and to what extent do these include knowledge, intellectual skills, and methods of inquiry to be acquired?
4. Does the institution have high standards without standardization—i.e., does it allow multiple pathways to achievement?
5. To what degree do the institution’s learning goals for general education include the following:
   a. an understanding of the basic content and methodology of the major areas of knowledge: the humanities and fine arts, the natural sciences,
and the social sciences?
b. a capacity to be a productive individual and lifelong learner: oral and written communication, computer literacy, scientific and quantitative reasoning, critical analysis/logical thinking, and the ability to acquire knowledge through a variety of means, including information technology?
c. a recognition of what it means to be an ethical human being and effective citizen: an appreciation of ethical principles; civility and interpersonal skill; respect for cultural diversity; historical and aesthetic sensitivity; and the willingness to assume civic, political, and social responsibilities?
d. reinforcement of the above throughout the curriculum? [3]

6. Do requirements for the major include clearly defined learning objectives, and do these objectives include an expectation of mastery of the knowledge, methods, and theories pertinent to a particular area of inquiry?

C. Student learning experiences

1. How congruent are instructional techniques and delivery systems with the mission and purposes of the institution? With students’ capabilities and learning needs?
2. In what ways are faculty members incorporating research on student learning in their teaching?
3. What is the range of methods of instruction and viewpoints to which students are exposed?
4. What learning options are available to learners to help them meet their learning goals? Are these options offered in varying lengths, at graduated levels of complexity, and clustered in different configurations? [2]
5. To what extent do programs and courses ensure an opportunity for reflection and analysis of subject matter?
6. How does advising or mentoring help students benefit from available educational opportunities and resources?
7. To what extent do educational offerings provide:
   a. an atmosphere of inquiry that values diversity of backgrounds and perspectives?
   b. an opportunity for students to engage each other and their teachers in a free exchange of ideas and attitudes?
   c. a course syllabus that specifies learning objectives consistent with published course descriptions?
   d. experiences relevant to student aspirations and interests?
   e. adequate time on task to learn and practice?
   f. an opportunity to integrate instructional and non-instructional experiences?
   g. active student engagement in learning?
   h. an opportunity for collaborative learning?
i. evaluation of student learning based upon clearly stated criteria that reflect learning objectives?

IV. Institutional processes for evaluating educational effectiveness

A. Defining educational goals and objectives

1. What institutional policies and procedures lead to the development, approval, and evaluation of its educational purposes and learning goals?
2. To what degree are educational goals derived from and based on the mission?
3. How does the institution ensure that the degrees it offers are aligned with its core purposes?
4. How does the institution ensure that its educational objectives are appropriate for its students, given their particular backgrounds and their intended objectives?
5. To what extent are mission, goals, and objectives:
   a. a guide to decision making?
   b. the product of a collaborative effort?
   c. related to external as well as internal contexts and constituencies?
   d. focused on student learning and institutional improvement?
6. How are goals applied within the institution and how is implementation coordinated?
7. What is the congruence between learning goals and assessment practices? [3]

B. Assessing student learning

1. What is the role of faculty in assuring academic quality?
2. In what ways does the institution gather, analyze, and use information about the needs and preferences of students and the values they place on programs and services? Is this information effectively used to create an overall climate conducive to student and institutional learning?
3. How does the institution ensure that the organization and delivery of its services to students are appropriately aligned with its educational objectives and its particular approach to teaching and learning?
4. How does the institution ensure that its programs can be completed in a timely manner, are configured to meet student needs, and lead to retention and graduation rates appropriate to the type of institution and student population?
5. To what extent does the institution regularly collect and analyze retention and attrition data for the student body as a whole as well as for major subgroups, and explore the implications of the data to be assured that the institution is being responsive to the needs of all its students?
6. How does the institution review and modify its courses and programs to reflect new knowledge and changes in the needs of society?

7. To what degree is the institution’s assessment program marked by:
   a. a structure with institutional mission and educational purposes at the center?
   b. measurable learning objectives for courses of study?
   c. a strong, readily-identifiable relationship between overall institutional mission and objectives and the specific educational objectives of individual departments or programs?
   d. faculty ownership, and use in ways that lead to educational improvements?
   e. support and collaboration of faculty and administration?
   f. incentives, recognitions and rewards for faculty efforts in assessment?
   g. shared authority, including a strong campus-wide coordinating or steering committee?
   h. an individual responsible for oversight?
   i. feedback to the faculty on a regular basis useful for the improvement of instruction and learning?
   j. student understanding of the purposes of assessment?
   k. systematic use of multiple measures, drawn extensively from existing sources?
   l. results useful for decision making?
   m. realistic goals and timetable and appropriate investment of resources?
   n. periodic evaluation of the plan’s effectiveness?

8. To what degree is assessment both an institutional priority and a way of life?

9. How are such factors as available resources, faculty expertise, student needs, and academic planning taken into account for curricular decisions?

10. How does the institution ensure that its curricula transcend a simple collection of courses?

11. How does the institution ensure comparable quality regardless of delivery mode?

12. How does the institution assure in-depth integration of general education and study?

13. How does the institution demonstrate commitment to excellence in both the teaching provided by faculty and the learning expected of students?

14. What does the institution know about the educational experiences and learning patterns of individual students? [3]

15. To what degree does the institution engage in “assessment as learning,” that is, ongoing assessment with feedback to help students improve? [4]

C. Using evaluative data for institutional change

1. What evidence exists of an institutional commitment to making meaningful use of student achievement data for the purpose of
enhancing educational effectiveness?

2. To what extent does institutional inquiry into teaching and learning affect the design of curricula, the design and practice of pedagogy, and the improvement of evaluation?

3. In what ways does the institution ensure that assessment outcomes are actively used as guides for decision-making, resource allocation, and action?

4. What record exists of institutional and unit improvement? What improvements in teaching and learning are evident as a result of assessment?

5. How are documented evaluation results communicated to appropriate constituencies?

6. How often does the institution systematically review and modify all parts of the planning cycle, including institutional and other research efforts?

D. Assessing usefulness of evaluation

1. In what way and how often is the assessment program reviewed for usefulness and cost-effectiveness?

2. How does the institution determine that its decision-making processes are appropriate to its stated mission and purposes?

3. To what extent has the institutional focus on assessment been a matter of commitment rather than compliance? [4]

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