

AMERICAN COUNCIL ON EDUCATION



OFFICE OF THE PRESIDENT

March 27, 2008

Barbara Ischinger
Director for Education
Organization for Economic Cooperation and Development
2 Rue André-Pascal
75775 Paris Cedex 16
France

Dear Barbara:

I am writing on behalf of the U.S. higher education associations listed below to respond to your invitation at the January 2008 meeting of the Council on Higher Education Accreditation (CHEA) to provide comments on the proposed OECD test of collegiate learning outcomes and to follow up on my letter of October 4, 2007.

We concur with OECD that higher education institutions around the globe must engage in continuous and rigorous assessment of student learning. As I indicated in my previous letter, the U.S. higher education community is vigorously developing institutionally-based methodologies and instruments to assess student learning. These assessments seek to provide a nuanced picture of student achievement, taking into account institutional goals and curriculum and the level of student preparation upon entrance into higher education. Our collective experience with assessment has shown how complex these assessments are and the extent to which they must be rooted in the institution's mission and curriculum.

We call to your attention, once again, the efforts of the U.S. higher education associations and the initiatives of many U.S. institutions to document student learning outcomes through curriculum-based assessments—through portfolios of student work (scored against agreed-upon standards and rubrics), capstone projects, secondary readings of student work, performance-based assessments, and comprehensive exams.

Although your stated intention is not to develop another ranking system, it is highly likely that the results will indeed be used to rank institutions. Policymakers will undoubtedly be inclined to use the results in ways that will disadvantage those institutions that do not perform well against others, possibly for reasons over which they have no control.

We are aware that OECD is moving ahead with a feasibility study. Thus, we urge you to consider the following points as you proceed:

1. The most important first step, if the feasibility study is to be truly institutionally-based and useful, is to begin with each pilot institution's capacity to develop learning outcomes and apply measures, tools, and frameworks; then move on to determine if all the institutions can reach consensus about the outcomes, the measures and tools, and how to

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- apply them in the context of institutional differences. Rushing to assessment in advance of clear aims and appropriate measures is a distorting and undoubtedly reductionist process.
2. There is great value in a common framework for reporting institutional data. But there is a difference between a common framework, which allows easy comparison of institutional differences and distinctions, and the assumption that one measure can or should fit all. It would be better to make transparent what individual institutions emphasize and how they assess the results and act on them.
 3. Individual institutional performance and outcomes can meaningfully be compared only in light of similarities and difference in such areas as:
 - a. Individual institutions' definitions of "higher education learning outcomes" reflective of cultural understandings and differences.
 - b. Academic standards, conditions and approaches to grading and evaluation of student competencies.
 - c. Curricular content and degree requirements.
 - d. Institutional mission or type, degree levels, governance and business model.
 - e. Student profile (including socio-economic background and academic preparation) and admissions criteria.
 - f. Resources: funding levels, faculty, and other resources.
 4. To develop measures of student learning that reflect the commitment of students and the impact of their actual experience at the institution, the assessment should be grounded in the curriculum of the institution.
 5. Transparency is of the utmost importance. We urge OECD to issue detailed periodic reports and seek the advice of a wide variety of campus practitioners and assessment experts (well beyond those of the steering committee), and national and international associations whose members have a stake in the outcome of the feasibility study.

We look forward to a continuing dialogue on this important undertaking and especially to the meeting on April 14 at the Department of Education.

Sincerely,



David Ward
President

DW/hb

On behalf of:
American Association of Community Colleges
American Association of State Colleges and Universities

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Association of American Colleges and Universities
Association of American Universities
National Association of Independent Colleges and Universities
National Association of State Universities and Land-Grant Colleges