

U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON EDUCATION AND LABOR
Testimony of Sylvia Manning, President
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I thank Chairman Miller, Ranking Member Kline, and members of the Committee for this invitation to testify on standards for program length in higher education.

I have served as President of the Higher Learning Commission of the North Central Association since July 1, 2008. Prior to that I served as Chancellor of the University of Illinois at Chicago; I have worked in higher education my entire adult life.

The Higher Learning Commission is the regional accreditor for 19 states defined as North Central. Specialized and professional accrediting agencies accredit specific programs, such as law, engineering, or nursing. Regional accreditors accredit entire degree-granting institutions of higher education; they are membership organizations composed of the accredited colleges and universities, committed to uphold shared standards and improve practices and outcomes. The Higher Learning Commission has just over 1,000 members representing the full spectrum of American higher education: public, private and for-profit; community colleges, four-year schools, professional schools, comprehensive universities, research universities, faith-based colleges, tribal colleges; colleges with a few hundred students and universities with tens of thousands of students.

This diversity of colleges and the spirit of freedom and enterprise that enabled its development are widely believed to constitute one of the pillars that have made U.S. higher education still the strongest in the world, despite continuing concerns about American global competitiveness. In fact, those continuing concerns are part of an unceasing drive to innovation that sustains quality.

It is my understanding that this hearing was prompted by the recently reported review by the U.S. Department of Education Inspector General of standards for credit hours and program length at three of the regional accrediting agencies. The report on the Higher Learning Commission was the last to be released and the most critical of the three, culminating in a recommendation that the Department undertake a review of the Commission's qualification as a recognized accreditor. The report and in particular that recommendation focused intensively on the case of a single institution and the Commission's decision to grant it accreditation.

In preparing this testimony I have proceeded on the understanding that the Committee's interest is not in a single institution or a single decision, but in the general issue of credit hours and program length and the broader issue of quality. I will refer briefly to the specific case at the end of my testimony and am entirely willing to discuss it further in oral questioning.

My testimony is in three parts: (1) The nature of accreditation and how it addresses quality; (2) The strengths and limitations of the credit hour as a measure to determine academic attainment; and (3) The relationship of the credit hour and program length to the assurance of quality.

Accreditation and Quality

Higher education institutions are regulated by state and local governments and, to the extent that they accept federal monies, the federal government. These regulations touch upon accounting standards, probity in the use of public funds, fire and building codes, discrimination in employment, athletics opportunities for students, research with human or animal subjects, eligibility for Title IV federal aid to students, and a variety of other matters.

Regional accreditation assesses the quality of a college or university to ensure that its academic offerings are appropriate and rigorous, that its practices have integrity, and that its business operations are robust. It looks at the entirety of the institution, necessarily taking a broad view. The issues it engages are complex and messy and often don't lend themselves to strict rules, to questions with yes-or-no answers and scores at the end.

Accreditation is an act of judgment based upon articulated standards or criteria that expressly allow for, even require, judgment. Because of that, it preserves the ability to adapt to varying circumstances, contexts and environments, to deal with diversity, to tolerate—even to encourage—innovation, and to apply constant pressure for improvement. Accreditation, in other words, seeks to support the innovative and adaptive spirit that has created the richness and range of American higher education, the range that in turn enabled the United States to democratize higher education long before other political democracies attempted to do so.

Accreditation pursues a dual purpose of quality assurance and quality improvement and must accomplish both rigorously. There are standards of quality that must be met, and there is the need for continuous quality improvement. Improvement is critical because quality is not immutable and it does not stand still: an organization is either improving its quality or losing it.

In regulations under Title IV of the Higher Education Act, minimum thresholds are often key and must be clear, although even in Title IV regulation there is a place for judgment by the staff of the U.S. Department of Education where appropriate. Accreditation typically shies away from defining minimum thresholds, and the Higher Learning Commission in particular has tended to less specific language, with phrases such as “commonly accepted.” But there is no basis for any assumption that the absence of precise or quantified minimum thresholds indicates or creates a lack of rigor.

The Higher Learning Commission, for example, has five Criteria under which it arrays 21 Core Components. The Core Components are findings that institutions must demonstrate and review teams must make, such as “The organization’s learning resources support student learning and effective teaching.” To support this finding, multiple forms of evidence will be required and the evidence will be concrete, but that is different from a “minimum threshold” that

might say something like “The organization must provide at least 1 public computer station for every 20 students enrolled.” In addition to the Criteria and Core Components, the Commission has 12 specified requirements for eligibility and supplements its Criteria with Statements such as “Principles of Good Practice in Adult Degree Completion Programs.”

The importance of evidence is paramount. The Commission’s guidance documents provide about a half-dozen “Examples of Evidence” for each of the 21 Core Components and reviewers are required to ground every judgment in substantial evidence.

The Commission relies upon expert or professional judgment to determine when standards are simply not met and to apply continuous pressure, even upon the best, to improve. Because it has not depended upon extensive definitions of minimum thresholds, there is no such thing as a “perfect score” in an accreditation review. In its commitment to quality improvement, the Commission eschews a pure regime of minimum thresholds under which an institution seeking only to earn its stamp of approval--its ticket, as it were, to Title IV funds--would be able to meet those minima and no more.

Key to accreditation is the use of peer evaluation by professionals who are qualified and trained to bring judgment to bear on questions of quality. The American judicial system requires juries of peers to assure a communal role in the execution of the law. Accreditation seeks juries of peers for the purpose of expertise, the expertise that is necessary where mission and outcomes are complex, rules cannot be framed with mathematical precision, and judgment is essential.

Countering the risk of excessive subjectivity in judgment, the Commission complements its extensive documented discussions with required training for its peer reviewers and multiple levels of review for critical decisions. Even a relatively small change for an institution, such as a venture into establishing an off-campus location, is reviewed for approval by more than one person. And, as noted above, judgments need to be based on evidence.

Voluntary accreditation has been in place in the United States for over a hundred years and has handled issues related to the evaluation of quality for most of that time. Accreditation works well because it ensures that institutions not only meet appropriate standards but are continually working to exceed those standards, all the while recognizing that institutions across the broad spectrum of American higher education are not all the same: they have considerable differences in how they approach the task of educating students. This diversity of institutions that provides opportunities for students across the United States to participate in higher education is a key strength of this country. I believe that voluntary accreditation is an important factor in keeping this system strong.

At the same time the Higher Learning Commission believes that its processes, like those of the institutions it accredits, can always benefit from review and improvement. In fact, we have agreed, in follow-up to the Inspector General’s report, to address further guidance for our review teams on the application of our standards. But the principles remain: Minimum thresholds may be useful, but they do not guarantee rigor and their absence does not create an absence of rigor. Alone they cannot produce high quality, especially the quality needed in a rapidly changing, competitive environment.

Credit Hours and Program Length

The concept of the credit hour was originally developed for K-12 education. It was adopted by higher education as a way to create a unit smaller than the course, to define differences among types of courses. Later it came to be used in a variety of other ways, such as to define the workload of a faculty member or assess tuition charges. It is now deeply embedded in so many facets of higher education practice that efforts to dislodge it would be highly disruptive. Only very recently in the last century did federal monies become attached to it for the distribution of financial assistance to students.

The credit hour is based upon what is often referred to (usually pejoratively) as seat-time, because it starts from the amount of time a student spends in a classroom. One semester credit hour consists of 15 hours in a classroom plus an assumed two hours of homework for every hour in the classroom, so that it represents a total of 45 hours. A three-credit course at a college on a semester calendar therefore normally meets three hours a week for 15 weeks and assumes that students are doing 6 hours a week of homework. (Except that an “hour” in the classroom is usually 50 minutes, an understanding developed to accommodate the need for students to have 10 minutes to get from one class to another on a college campus.) In theory the definition still makes sense. In practice it has always been mushy.

Anyone who has ever taught or taken a class knows the concept of credit hours is mushy. No one can be sure how much time students spend on homework, but we do know that in any given class there will be huge variation. What’s more, the seat-time and homework time, that is the credit hour, has nothing to tell us about what a student learned. But we do know that some students get A’s and some students get D’s and that the students who got A’s learned more than the students who got D’s – or at any rate knew more by the end of the course – even though they all met the same credit-hour requirement. Furthermore, we know but don’t like to say that a student who earned an A in a course of a given description with a given number of credits using the standard credit-hour definition might take the same course with the same description and the same number of credits using the same standard credit-hour definition at another college and earn a C – because there are differences in what is taught under the description and in the performance expected of students.

So the credit hour by itself is not very good for telling us what a student learned. It may be very good for other things, but not for that. And that is why Undersecretary for Higher Education Martha Kanter has chided accreditors for using input measures like seat-time to assess quality. And that is why for the past 20 years higher education has been developing ways to measure student learning outcomes. That is still a developing art, because it is very difficult to do once you get beyond factual knowledge and basic skills. But that is why some accrediting agencies, like the Higher Learning Commission, have put less emphasis on credit hours as minimum standards and more emphasis on assuring that colleges figure out what their students actually learn and use those assessments to improve their curriculum and teaching.

Program length is almost uniformly defined in American higher education by a number of credit hours, usually referred to simply as credits or units. It is a practical description, and just as the concept of credit hours serves in a mushy way to define a quantity of learning, or at least a quantity of teaching, program length in terms of credit hours defines a degree level. For example, bachelor's degrees are generally 120 or 124 credits, though in some fields, especially technical and certain practice fields, they creep up to as much as 136; associate's degrees are generally 60 credits.

Credit hours and program lengths as developed in this way have come under question not only for their mushiness but also out of the need to adapt to a world in which a declining percentage of students are traditional students who go away to college or commute to college on a full-time basis. Alternative modes of delivery, most notably internet-based distance delivery that permits a student to participate in classroom activities at any time from anywhere, make nonsense of the idea of seat-time. Furthermore, research in adult learning and the effectiveness of compressed course formats suggests that equivalence should not be measured by time.

Does this mean that higher education should do away with the concept of credit hours? No; but we need to be thoughtful in how we apply it. Over the decades during which the concept of the credit hour has been used, it has come to be understood not as a multiple of hours but as a unit for describing a quantity of information or skill provided in a specific course. Professors of English share widespread understanding of what a three-unit survey course in American literature comprises, and professors of Chemistry know what they should cover in a three-unit course in introductory Chemistry. Those two things are enormously different, and there is no equating the three credits. They began as two of five courses that a typical freshman or sophomore would be expected to carry in one semester in a traditional, full-time college, and that body of effort, for each of those courses, has come to be well understood by the professionals who prepare and teach the courses.

That is how those professionals were then able to transfer the concept of credits to compressed or asynchronous formats where hours can't be counted. What they transferred was not the hours, but the body of work, the body of information and skill. It is symptomatic that the phrase "credit hour" isn't used much: people speak of credits, or units, or sometimes hours, though in that case they would likely be surprised to be taken literally, as though "hours" had something to do with a clock. That is why they accept the notion of giving degree credit for work experience or military training.

If program length is measured in credits and credits are mushy, then program length is necessarily a mushy standard too. But it has come to be workable, just as the concept of credit hours has. That is why we do not support the notion of creating three-year bachelor's degrees. We support the notion of students' completing what has been understood as a four-year program in three years, through advanced placement, year-round course-taking and suchlike, but we believe that it is useful that a bachelor's degree is generally understood to be four years of work and an associate's two, and that calling a three-year program by either of those names would just create confusion. We can have a three-year degree, but let's call it something else.

Credit Hours and Assurance of Quality

The Inspector General's review of the Higher Learning Commission and two other regional accrediting agencies took place in the context of an upcoming session of negotiated rule-making called by the Department of Education, for which one of the issues on the table was the matter of definition of credit hours and program length. The argument put forward as to why a definition was necessary was that the Department of Education needs to assure that federal funds are going towards quality education. That goal is incontrovertible. Ideally, such assurance would be based not on the input of credit hours, but on the outcome of learning. But in reality, federal funds need to be disbursed to students at the beginning of a term, not at the end when it would be at least theoretically possible to measure what they had learned. So the Department needs an input measure.

Will defining that input measure, the credit hour, with more specificity contribute to the assurance or improvement of quality in American higher education? I do not think so. The apparent precision of the credit hour as originally defined, based on the fact that it has numbers, is an illusion: underneath the numbers lies the mush.

Will the Department's requirement of that input measure harm American higher education? I do not think that either. But resources will be spent in demonstrating compliance with the regulation, resources spent by colleges and universities, not accreditors, and diverted from helping students. And it is possible that the risk of citation by an accreditor will deter some institutions from innovation in developing programs for adults and other student populations.

What strikes us as curious is that the call for minimum thresholds in matters such as the credit hour and program length runs counter to the country's expressed interest in increasing, significantly and rapidly, our nation's attainment in higher education. To meet our national goals for educational attainment and a workforce for the 21st-century economy, higher education is asked -- by policy makers, legislators, foundations, opinion leaders -- to break out of old molds, seek efficiencies, open doors, reach new populations. Strict accreditation requirements based in 19th-century models don't seem likely to get us there.

Can rigor in quality assurance be achieved without defining a credit hour, or requiring institutions to define it or accreditors to approve the definition? Yes. This point may be best demonstrated by referring to the specific case at the center of the Inspector General's report on the Higher Learning Commission. The core of that issue was the fact that a visiting review team to a campus had identified some courses which the team determined were being awarded about double the amount of credit they were worth. Because the Commission nonetheless granted accreditation to the institution, the Inspector General asserted that the Commission either does not have standards or is unwilling to enforce its standards.

But here is the record: (1) the Higher Learning Commission, not the Office of the Inspector General, identified the issue of credits during its review of the institution; (2) consistent with the recommendation of two teams of experienced peer reviewers and based on their academic judgment, we determined that the issue -- given the general strength of the

institution under our standards – did not warrant denial of accreditation and that a requirement to remedy the problem would be the most effective approach; and (3) further review and a site visit to the institution have since provided evidence that the approach worked. Our standards and procedures identified the problem and corrected it, benefitting students and the public in a way that denial of accreditation could not (especially since the institution was already accredited by another agency and its students were already receiving Title IV monies).

The visiting team of expert reviewers identified the problem, without benefit of a precise definition of the credit hour from either the institution or the Commission. The members of that team, based on years of professional experience, applied professional judgment, pronounced the credit ascription out of line and recommended that the Commission require this fault to be cured (which the Commission did). When the team declared the credit values to be out of line, it did not do so based on how many hours the students spent working on the course, in a classroom or elsewhere. It did so based on the syllabus, on the curriculum, on what and how the students were being taught.

Conclusions

We offer the following conclusions:

- It is appropriate for the Department of Education to assure that recognized accrediting agencies pay great attention to quality and rigor, including the award of appropriate academic credit.
- Accreditation can and does achieve rigor because it relies on peer judgment based on clear evidence and demands improvement well beyond minimum standards.
- The absence of a definition of the credit hour or other minimum thresholds has not impeded the Higher Learning Commission's discernment of quality or making rigorous accreditation decisions.
- A definition of the credit hour, if accompanied by sufficient leeway to adapt to contemporary modes of delivery and adult learning, is something higher education can work with, but it will not assure or improve the quality of higher education in America.
- There is room for improvement in accrediting agencies' assessment and assurance of quality. The Higher Learning Commission is committed to improving its practices and to demonstrating that commitment in action, just as it expects its institutions to be.

Thank you again for the opportunity to testify before the Committee. I look forward to responding to any comments or questions you may have.