

Accreditation NOTES

Western Association of Schools and Colleges
Accrediting Commission for Community and Junior Colleges

Where Do Course SLO's Live?

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with Dr. Barbara Beno, President

The 2002 Accreditation Standards and Eligibility Requirements (especially ER-10) placed an increased emphasis on the assessment of student learning as a means of evaluating and improving the educational effectiveness of institutions. A few examples of standards that deal with learning outcomes are below:

Standard IB: Improving Institutional Effectiveness

The institution demonstrates a conscious effort to produce and support student learning, measures that learning, assesses how well learning is occurring, and makes changes to improve student learning.

Standard II A.1.c:

The institution identifies student learning outcomes for courses, programs, certificates, and degrees; assesses student achievement of those outcomes; and uses assessment results to make improvements.

Standard II.A.6:

In every class section students receive a course syllabus that specifies learning objectives consistent with those in the institution's officially approved course outline.

This article seeks to add some clarity to the dialogue between and among member institutions, particularly the faculty members, about what the Standards require. The interpretation and application of SLOs at the course level has generated four common questions:

- How do course SLOs relate to learning objectives?
- Must SLOs be consistent across all sections/classes of a course?
- Must SLOs appear in official institutional documents such as the official course outline or catalogue?
- Must SLOs appear in the faculty members' course syllabi?

In an ideal situation, intended student learning outcomes should be the foundation upon which a course is developed. Faculty first define the learning outcomes they expect successful students to achieve and demonstrate, and then from those intended outcomes, design the course. Pedagogy, learning environment, and learning support materials all follow from intended SLOs.

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Realistically, many course designs have been driven by other matters, including transfer institution requirements for general education, articulation agreements, course sequencing, and the notion of the canon of course objectives – what the course will “cover.” Vocational or technical courses may have begun with intended learning outcomes as the basis for design, but most institutions are really *adding* student learning outcomes onto existing academic courses. Nevertheless, a good course (and one that successfully addresses accreditation requirements) identifies the intended SLOs for the course, as well as the means of authentically assessing whether and how well students learn.

How do course SLOs relate to learning objectives?

Most of the confusion about the difference between SLOs and learning objectives lies in the term “objectives.” Generally, objectives specify discrete steps taken within an educational program to achieve an outcome. They are the means, not the ends. So the “course” objectives specified by the California public college system’s Academic Senate, for example, are defined as follows: “Objectives are the key elements which must be taught each time the course is taught.”¹ Course SLOs are the intended learning outcomes; objectives are the things that must be taught/covered in order to achieve those learning outcomes. Sometimes, these things are very close; often, they are quite distinct.

Must SLOs be consistent across all sections/classes of a course? With SLOs defined in part as the foundation of a course, the ACCJC requirement is that each course has a single set of SLOs that is common to all

¹ The Course Outline of Record: A Curriculum Reference Guide, adopted Spring 2008 by the Academic Senate for California Community Colleges.

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sections/classes of the course, no matter who teaches the section or class (Standards II.A.6 and II.A.6.c.). This assures that all students will know what to expect as the potential outcomes of completing a course successfully. One might refer to that set of SLOs as “core” SLOs for the course. This also means each faculty member teaching the course must ensure the core SLOs are adequately addressed in the pedagogy, pacing, educational materials, learning environment and assessment strategies of the individual classroom. A question often asked is: Can individual faculty choose different strategies and course materials to help students achieve the same core SLOs? The answer is, “That depends on whether the strategies are appropriate to help students learn the intended SLOs.” Accreditation standards ask institutions to analyze learning and to use the results to guide improvements in learning by changing pedagogy, curriculum, etc. (Standards II.A.1.c, II.A.2, II.A.2.a, b, e and f). So, diverse strategies among faculty members will be a means of identifying diverse approaches to high quality education and, over time, of identifying which strategies should be abandoned in favor of more effective approaches. In addition, some faculty may want or need to emphasize *additional* SLOs within a course. As long as students are notified of all course SLOs, this practice is acceptable. (See the last question and answer in this article.)

Must SLOs appear in official institutional documents such as the official course outline or catalogue? Since a course must have a single set of core SLOs, it is reasonable to expect those SLOs to appear in the official course outline which guides the faculty teaching the course. The Commission’s use of the phrase “official course outline” refers to the document used by the institution to define its official curriculum. Should the SLOs appear in the catalogue? The catalogue serves as a contract between the institution and its students. Standard II.A.6 states that “The institution describes its degrees and certificates in terms of their purpose, content, course requirements and student learning outcomes.” It is clear the degree and certificate learning outcomes have to be in the catalogue. In practice, some current institutional catalogues, particularly those in print copy, do not provide a great deal of detail on course content. Others do. In any case, the intended course SLOs ought to be accessible to students who are contemplating taking the course, either in the catalogue or through a link or

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other reference found in the catalogue.

Must SLOs appear in the faculty members' course syllabi? Yes. The answer to this question appears at the beginning of this article, in the quotation from Standard II.A.6. The Commission acknowledges that the use of the words "learning objectives" in this standard appears to be vestigial language from the 1994 Standards. The Commission is currently editing the standards to change the words "learning objectives" to "student learning outcomes."

Just as important as the existence and placement of SLOs is their assessment and the use of assessment results to improve educational effectiveness and learning. These topics will be covered in future articles appearing in this newsletter.

Department of Education Begins Negotiated Rulemaking

The U.S. Department of Education will begin negotiated rulemaking to finalize the regulations that implement the Higher Education Opportunity Act passed last September by Congress. There are four negotiation committees scheduled, and the one that will negotiate on accreditation matters began its work March 4, 2009. Negotiated rulemaking will occur over the months of March through May in three-day sessions. The Department's list of topics to be negotiated includes both elements of the new law as well as issues it attempted to negotiate in 2007. Among those topics are:

A new definition of distance education: The new law attempts to more clearly distinguish between distance education and correspondence education, and the Department has indicated it wishes to incorporate a definition of correspondence courses into the regulations that pertain to accreditation. The accreditors would be required to assure the quality of correspondence courses.

Qualifications of accreditation team members: The new law requires accreditors to assure that their team members who evaluate distance education are "... qualified by education and experience in their own

right and trained by the accreditor, including training on their responsibilities regarding distance and correspondence education."

Standards for Student Success: The new law requires accreditors to have accreditation standards which effectively address "success with respect to student achievement in relation to the institution's mission which may include different standards for different institutions or programs, as established by the institution." This language is very confusing, and the rulemaking will be an important means of clarifying it.

Transfer of Credit: The law mandates accreditors to require institutions to have transfer of credit policies that are publicly disclosed and include a statement on the criteria established by the institution regarding transfer of credit.

Teach-out Agreements: The law mandates accreditors to require an institution to submit a teach-out agreement when the institution is notified by the Department that its participation in Title IV has been suspended or terminated, when the accreditor acts to terminate accreditation, and when the institution decides to cease operations.

Conditional Recognition: The Department wishes to negotiate a definition of the recognition process it uses to approve accrediting bodies and to include in that definition the conditional nature of recognition (i.e., that it can be withdrawn any time an accrediting body is found to fail to meet all required criteria). The Department's proposal includes no provisions for prior notification to the accreditor (i.e., no "due process").

Existing regulation called the "one-year rule" requires the Department to withdraw the recognition of any accreditor found out of compliance that fails to come into compliance within one year. The Department proposes to clarify this language.

A current regulation concerns the procedure for limitation, suspension or termination of recognition. The Department seeks to combine this topic with the first item on conditional recognition.

Direct Assessment of Student Learning: The new law requires that an institution that uses direct assess-

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ment of a student's learning to grant credits to prove the learning is equivalent to a specific number of clock or credit hours. The new law requires accreditors to review this practice for inclusion in the institution's accreditation reviews.

Distance Education: The new law requires accreditors to assure that institutions offering distance education have processes in place that establish that the student who registers for a distance education or correspondence course or program is the same student who participates in and completes the program and receives the academic credit.

Monitoring Institutions: Current monitoring regulations are very broad and general and require an accreditor to periodically reevaluate whether an institution remains in compliance with agency standards throughout the accreditation period. The new law inserted a requirement that accreditors monitor the growth of programs at institutions that are experiencing significant enrollment growth, and also to be accountable if the distance education or correspondence course enrollments increase by more than 50% in a fiscal year. This language is of concern over how the negotiations will likely operationally define "monitoring."

Substantive Change: The Department wishes to negotiate additional language defining Substantive Change and the accreditors' responsibility for review of change. The Department has indicated a concern about the pace with which change is occurring in higher education, particularly in distance education programs, new locations, new curriculum, and change of ownership.

Record Keeping and Confidentiality: The Department wishes to obtain information about institutions from accreditors regarding Title IV eligibility and compliance and is sometimes thwarted in these efforts by the Freedom of Information Act, which offers some exemptions from disclosure such as trade secrets or privileged financial information. The Department wishes to clarify its regulations in this area. It also wants to develop a rule that would require accreditors to retain "necessary data and information." Presum-

ably this "retained data" is to serve the Department's own needs. In the last year, a contractor working for the Department has been asking accrediting bodies for extensive historical information on accreditation, substantive change approval of new programs and sites, and closure of programs and sites.

Appeals: The new law modifies the due process requirements for accreditors considering an institutional appeal of an accreditor's decision to deny or terminate accreditation. The Department proposes to also clarify some of the relevant terms used in the law, which uses both the terms "adverse action" and "adverse decision." The new law also requires an accreditor's appeals policy to permit an institution to introduce new and significant (and necessarily relevant) financial information during the appeals process; in all other regards, an appeal allows no introduction of new evidence.

Summary of Agency Actions: The new law requires that an accreditor make available to the public and the Department a summary of the agency's actions, including (1) the award of accreditation or reaccreditation, (2) final denial or termination of accreditation, and any findings made in connection with the action taken, together with the official comments of the affected institution, and (3) any other adverse action taken with respect to an institution or placement on probation of an institution.

ACCJC member institutions should check the Commission's website in June for a report on the outcome of negotiated rulemaking.

