

Comments Submitted to the National Commission on Accountability in Higher Education  
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Introduction

Despite years of effort to implement structures for accountability in higher education, states are still searching for effective models. Most state efforts continue to be plagued by value conflicts between policymakers and educators, problems of measuring student learning, unrealistic performance budgeting schemes, confusion about the audiences for accountability, a focus on institutional performance that shortchanges critical state issues, and general data overload that impedes, rather than enhances, decision making.

Policymakers across the nation are in dire need of reliable, useful information about higher education outcomes. Whole segments of the population nationwide are in danger of being excluded from the opportunities afforded by postsecondary education. Accordingly, states are in danger of becoming wholly under-educated for the demands of the new century. Important state policy issues of access, capacity, affordability, achievement gaps, and economic development are not being addressed adequately in the kinds of accountability systems that are in place in most states.

Certainly there have been gains and lessons learned from past attempts. Consensus has developed around best practices and principles – advising, for example, that states base accountability structures on state policy objectives, focus on improvement, avoid unnecessary duplication with other bodies involved in oversight, look beyond readily available indicators, and monitor only those issues that are amenable to government intervention. Nevertheless, many state systems still focus on things other than state policy objectives, such as providing consumer information or comparing “common core” indicators across institutions for purposes of relative reward and punishment, and most still collect far too much data, much of which is not useful in setting policy or budgets.

With the publication of its “Measuring Up” report card, the National Center for Public Policy and Higher Education encouraged states to view accountability from a state policy perspective. Most of the states that have used the report card as a basis to create state plans for improving performance, however, have done so from the more traditional viewpoint of evaluating the individual colleges and universities in their states. Although many are using tiered structures of state-level, common core, and institution-specific indicators, the mindset is still ultimately one of evaluating and comparing institutions with an eye to budgetary consequences, rather than examining statewide educational performance for purposes of state policy intervention on a much broader scale.

## Three Keys to Effective State Accountability

In my view, the three areas where states have encountered the most difficulty in designing effective accountability systems hold the key to future success:

*(1) Distinguishing between state goal achievement and institutional effectiveness and between the roles of policymakers and governing boards*

Most state accountability systems are focused far too much on the performance of individual institutions and too little on the achievement of state goals. They are based on the flawed assumption that the sum of the parts equals the whole. However, it is possible (in fact, it is probable) to have high performing institutions that *collectively* do not meet the educational needs of the state. The following are just a few examples of how institutions can do a good job of educating the people who come to them but still fail to meet the state's goals:

- institutions may all have good retention and graduation rates yet the state may be educating far too few people to sustain a healthy civic and economic life;
- community colleges may be preparing students to transfer and universities may graduate transfer students at good rates, but large numbers of transfer-ready students may never enroll in a university due to capacity or budget constraints;
- teacher training programs could report high pass rates on teacher certification exams but the state as a whole could have a serious shortage of teachers.

Accountability systems designed principally to collect, review, and compare campus performance run the risk of missing these larger, cross-cutting issues. Accountability systems focused on state policy goals can require data that have little to do with the performance of individual colleges and universities. For example, lawmakers need information to inform state policy choices about governance and system design, admissions policies, K-16 alignment, articulation across sectors, remediation, linkages with business and industry, economic development, and financial aid, as well as finance. This can include data from K-12, census data on education and income levels of the state's population, and data from the economic development sector.

The focus on institutional performance and institution-level data has several problems:

- it diverts state policymakers from the issues that they can influence through their responsibility to make public policy;
- it leads to micromanagement over institutions, whose own governing boards are responsible for monitoring and managing institutional effectiveness;
- it overloads state accountability systems with far more data than people can digest and use by reporting data on individual institutional performance and mission-specific activities that are not helpful for state-level decision making; and
- it leaves policymakers to make important fiscal and policy decisions without access to meaningful data about how the state is performing in key areas.

*Looking ahead.* States should consider a tiered approach to accountability that embeds institution-based accountability within the larger context of state goals. This requires:

- holding governing boards accountable to manage and monitor their institutions to respond to the state's goals and priorities as is appropriate to their missions;
- allowing governing boards to have primary responsibility for the review of institutional data and for acting to address issues of institutional performance;
- building a state reporting system around data with implications for state policy intervention as opposed to institutional practice;
- using state performance data to improve the degree to which all of the state's postsecondary institutions collectively advance the state's education agenda; and
- establishing mechanisms outside a state reporting system by which institutions provide the kinds of information that help consumers choose among institutions.

## *(2) Clarifying Responsibilities for Assessment of Student Learning*

It is understandable that state policymakers want to know whether students in their colleges and universities are learning. It is difficult to argue that there are any outcomes more important than student learning. However, state accountability systems have struggled to develop meaningful and useful measures of student learning. State policymakers have little capacity to review and act on the kinds of qualitative outcomes assessment data that faculty collect and review on an ongoing basis. Even the more quantitative approaches to learning assessment present major ambiguities for lawmakers in terms of interpreting and using results. Yet state officials responsible for designing accountability systems have generally been unwilling to delegate the hard work of student learning assessment to the campuses, where assessment is already a faculty priority under the watchful eyes of academic administrators and regional accrediting agencies. The failure to distinguish adequately between the role of policymakers and that of educators in the assessment of student learning has been a major obstacle to the implementation of effective state-level systems.

*Looking ahead.* State-level accountability systems should reflect an appropriate division of responsibility between policymakers and educators in assessing student learning by:

- focusing a state reporting system on broad measures of student *success* that are amenable to policy intervention, such as completion rates, transfer success, time- or units-to-degree, remediation success, and effective transition to the workplace;
- continuing to look for valid, aggregate measures of college-level learning such as the Collegiate Assessment of Academic Proficiency;
- delegating program-specific learning assessment to institutions and holding them accountable for demonstrating how assessment processes are used to improve student learning; and
- recognizing that the hard work that remains to be done to improve assessment, program review, and accreditation, must be done outside the structures of state reporting systems.

### *(3) Finding Workable Linkages Between Performance Data and State Investments*

One of the chief purposes of accountability in higher education is to help lawmakers understand whether their large investments in higher education are well-placed. This requires a mechanism for linking performance information to budget decisions. Most states, unfortunately, have assumed that the only way to accomplish this is through what Peter Ewell calls “classic performance funding” – the application of indicators, targets, and formulas to determine a small percentage of budget allocations. In fact, performance funding is but one way to attempt to link performance data with budgets, and one that, despite its appeal in theory, has encountered a range of practical obstacles:

- assigning automatic consequences to a set of mostly imperfect indicators and arbitrary targets, weights, and formulas limits the willingness of the academic community to work with lawmakers to examine critical aspects of performance;
- performance-based rewards are often suspended due to a lack of funding, sending the unfortunate message that performance is only important when coffers are full;
- implementation gets derailed by the quandary faced when institutions underperform, i.e., policymakers have generally been unwilling to accept the “remedy” of reducing funding to colleges where performance is lagging; and
- legislators resist the loss of discretion that accompanies performance funding formulas and often lack the political will to implement them when the political costs of doing so come into focus.

Looking ahead. The real challenge is to find ways to use performance data to identify priorities and influence budget decisions. Instead of placing performance expectations on a small portion of the budget, states should demand results from their entire budgetary investment. Instead of searching in vain for a magic formula to link performance and budgets, states should work to improve existing democratic decision processes by:

- improving the quality and relevance of the data available to lawmakers to better inform their judgments about how well the state is meeting its educational goals;
- giving lawmakers more informed bases for deciding how best to target funding in the effort to address deficiencies and accomplish stated purposes;
- recognizing that incentive funding (provided in advance of intended behaviors) may be a more effective way to target scarce state resources than are rewards to high performers;<sup>1</sup> and
- employing skilled advisors to analyze and interpret performance data, with respect to appropriate standards, in order to help lawmakers understand where there are deficiencies and how they can be addressed through targeted funding.

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<sup>1</sup> As Peter Ewell points out in his excellent analysis of options for linking performance to resource allocation, incentive funding is more appropriate for correcting deficiencies than are rewards. (Linking Performance Measures to Resource Allocation: exploring unmapped terrain, *Quality in Higher Education*, Vol. 5, No. 3, 1999.) An analogy to student aid seems apt here: just as merit aid is generally considered not the best use of scarce state resources because it moves students around rather than increasing college participation, rewards for high institutional performers in the face of such immense deficiencies in state educational achievement may not be the best way to target scarce state resources.