

Quality Assurance for Higher Education

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[Entangled Solutions](#) is launching a new service to become a Quality Assurance Entity (QAE) to independently review and monitor the quality of individual higher education programs. We are initially focusing on joint university+bootcamp programs applying to the [EQUIP](#) program.

What We Believe

1. Quality assurance should focus on outcomes, not inputs.
2. Standards should be open, and findings should be transparent.
3. No organization should own a monopoly on quality assurance.
4. Students' opinions matter, particularly after they have had time to evaluate their experience.
5. Learning outcomes should be judged on a value-added, or individual growth, basis.
6. The metrics used should encourage institutions to innovate to better serve students.

Quality Assurance Framework

We know that outcomes matter. Focusing on inputs locks institutions into a fixed way of doing things and inhibits the ability to innovate. Focusing on outcomes, however, encourages continuous improvement toward an overall set of goals—in this case, goals around student success.

As a result, it doesn't make sense to dictate to institutions that they maintain input-based measures like the number of teachers with advanced degrees or the amount of student-teacher interaction. Nor does it make sense to mandate pseudo, or intermediate, output-based measures like graduation rates. Students don't "hire" schools in order to graduate; graduation is a means to an end.¹

We intend to focus measurement on the value that each program claims it is providing students and match that with what students are in fact "buying." If, for example, a program claims to provide a career benefit, we will measure that benefit relative to the program's cost, assess how the program's benefit compares to alternative options, and report on what students say they wanted and received from the program.

By focusing on the final outcome, our measurement captures all intermediate outcomes. If, for example, students don't bolster their career fortunes because they didn't complete the program, then that will be captured in our outcomes-based framework.

Our preliminary framework contains four final-outcome-focused metrics on which we will audit institutions:

- A. **Claims for learning, assessments, and student work.** We will work with programs to choose at least one assessment, and sometimes several assessments—be they traditional, objective assessments; portfolios of work; measures of social or emotional gains; or rubric-based grading of more subjective, performance-based assessments—that are valid, reliable, and appropriate for the program of study at a postsecondary level and have value to external stakeholders.

All programs that require students to spend time in class—physical or virtual—will be required to administer pre- and post-assessments to students and report individual student growth.

For students in competency-based programs, we will not require pre- and post- assessments, but we will hold such institutions to a higher standard to demonstrate that the students receiving a credential have indeed demonstrated full mastery of the competencies and that the assessments used to determine mastery are valid and objective.

¹ For the purposes of the EQUIP program, we will comply with the reporting requirements as outlined in the "[Notice Inviting Postsecondary Educational Institutions To Participate in Experiments Under the Experimental Sites Initiative; Federal Student Financial Assistance Programs Under Title IV of the Higher Education Act of 1965, as Amended](#)," Federal Register, 10/15/15. This means we will require that institutions report, and we will audit, their claims about how students are progressing through the program as measured by completion. See [this paragraph](#) in the notice for precise language.

No QAE will have subject matter expertise in all the possible fields of studies that programs could offer, so our role in the process of validating assessments will be twofold:

1. To examine the process under which the assessments were constructed, how the instruments were normed, and, for programs that require seat time, how much “value” the program adds, as defined by individual student growth from the pre- to the post-assessment. We will encourage processes where external experts are engaged in the design of assessments, and we encourage similar institutions teaching similar disciplines to use the same or similar assessments in order to compare learning outcomes.
2. To evaluate the process through which the program delivers assessments. We will expect programs to provide evidence that they instructed students to do their best on both pre- and post-assessments, and that proper controls were in place to ensure that students took the assessment themselves free from inappropriate assistance.

B. Placement rates. Programs will report students’ placement rates—recorded 90 and 180 days upon students exiting the program—into the outcome the program is attempting to effect (for example, a full-time job or further higher education). We will audit institutions to be sure that students are successfully realizing their goals—whatever those may be—for attending the institution by moving successfully into their next walk of life.

In the case of programs that exist to move students into further higher education, we will also audit program claims around articulation and where their credits are accepted.

In line with the New Economy Skills Training Association’s [recommendations](#), programs should also report the specific post-completion plans for students considered “non job-seeking” or “non higher education seeking,” and we will audit these claims.

C. Earning boost. This measure captures the change in earnings students experience from prior to attending their program to after. If a student was not in the workforce prior to entering the program, then for the purposes of calculating the delta, programs should assume that his or her prior earnings was the average for a person of his or her experience and background with the education credentials that he or she possesses prior to entering. If a student pursues further higher education after the program and does not enter the workforce immediately, for the purposes of calculating the delta, programs should assume that the student’s post-program salary is equal to the average salary for a student who attends, but does not necessarily graduate, from the next higher education program in which the student enrolls.

Understanding a student’s change in earnings is critical to measuring the return on investment that students receive from a program to give them the assurance that the experience—in building a mix of knowledge, skills, dispositions, and social capital—will be worthwhile. Because certain programs do not pay off immediately in earnings but instead do so over a longer time

horizon, we will work with institutions to measure this on a weighted average that gives more weight to a student's first job over a longer time horizon (up to 10 years) as makes sense.

D. Student satisfaction and confirmation of purpose. Programs will be required to survey students with two objectives:

1. To measure their satisfaction with the program. This measure is based on former students answering the following question on a 10-point scale: "Knowing what you know now, would you choose to repeat your experience here?" This qualitative measure is important, as not all students attend college for strictly job-based or academic outcomes.
2. To validate whether the goals established by the program is consistent with students' own expectations for the program. This measure is based on asking former students the following question "When you decided to enroll in the program, what goal were you attempting to achieve?"

Management Audit

In addition to auditing a program's current outcomes, we will also report on issues that might serve to effect the "quality" of the program going forward--both positively and negatively.

Long-term stability. As the EQUIP program requires, we will review and assess the long-term financial plan of each program. The goal of this area of assessment will be to determine whether the program has the requisite capital to teach for the duration of the term.

We also recognize that financial situations can create perverse near-term incentives related to program quality, so we will provide additional scrutiny to the following three classes of programs based on financial considerations:

1. Programs at substantial financial risk.
2. Programs that are rapidly scaling.
3. Programs owned or run by publicly traded institutions.

Innovation roadmap. All participating institutions need to have initiatives in place to improve the value of their program and/or the learning outcomes across all student types (or, in the case of a generally high performing institution, improving the performance in lower performing demographics). All institutions will need to articulate the nature of these initiatives and the expected performance gains, including any tests, pilots, or other research that justifies the expected improvement. With each audit cycle, Entangled Solutions will measure actual performance improvement over projected improvement.

New modalities. Innovation requires adapting programs to new modes of instruction. Institutions should be encouraged to incorporate new modes of teaching and learning into their instruction. That said, changes in modality can have a substantial impact on quality. As such, we will provide additional

scrutiny for and report separately on programs that change the modality of 25% or more of a program's instruction (as measured as a percentage of time or competencies).

Audit Process

Disaggregated reporting. We require that programs publish these audited outcomes-based measures both in sum as well as in a disaggregated way to show the outcomes for low-income students. In addition, we require that programs publish information about the students that they serve with their varied interests, goals, and demographics, such that students can use that information to make more-informed decisions about their postsecondary education. We also require programs to publish their tuition price, net tuition price, and expenditure per student in a clear and transparent way.

Comparing value. We will take the results from the above four final-outcomes-focused metrics to assess how the program's benefit compares to alternative options. We will do this by calculating the return on investment from a program along a variety of metrics--such as earnings boost divided by tuition, net tuition, and expenditure per student--for the total student population, as well as for different students in different circumstances based on the disaggregated numbers.

With the results made public, third-party organizations could also choose to monitor the veracity of the claims and make judgments around quality.

Open standard. Similar to the financial audit process, in the long term, a non-profit entity will maintain the standards behind the full quality assurance framework in an open and transparent format. As with international accounting standards, any other auditing organization can use the framework to audit a higher education program. This is important, as we believe that no organization should own a monopoly on quality assurance.

Audit Results

Historically access to federal education funds has been on a binary basis. Either programs qualify or they don't. Although we are not in a position to change that methodology, we do not agree with it.

Quality cannot be judged on a binary scale, and judging quality on a binary scale creates significant tradeoffs. From the government side, for example, because access to higher education has long been an important goal, the government has not been able to make the bar for programmatic quality too high, lest it roll back access for millions of students, but keeping it low allows poor providers into the market. The all-or-nothing access to funds does not compel students to make rational quality-cost trade-offs. It is no easier for students to get loans to colleges that offer a stellar return on investment than it is to get them for colleges that offer a poor one.

Access should instead be determined on sliding scale, based on a program's relative quality--much as the private loan market for higher education works. The challenge, of course, with the private loan

market is that it is based exclusively on economic returns, whereas there may be other societal and personal benefits from attending higher education that the government values. Because our formula will provide views of return on investment along a great variety of metrics--many of which will not be purely economic--we believe that the public and private sector alike could improve the financing of students' higher education by adopting pieces of our framework and, in the case of the federal government, moving beyond today's flawed all-or-nothing financing system.