Members of the House Higher Education Committee:

I wish to add to my oral testimony yesterday in opposition to the HECC's two new accelerated learning models (in HB 2313) by submitting to you my feedback to Accelerated Learning Work Group (ALWG) on their second draft. What appears below is not an exhaustive list of the problems with the sponsored dual credit and assessment-based learning models. I have just focused on the reinforcing set of negative incentive built into these models. Others have worried about other difficulties; chief among them is the educational qualifications of the high school teachers who will be primarily responsible for carrying out the actual instruction. As for my feedback, a little background may answer questions that might naturally arise from reading this document. When, the ALWG issued their second draft they also attached an extensive set of questions and answers. These answers gave a much clearer view of how their two new models were supposed to operate. There are many parts to my response that are based on the information provided in this question and answer section. When the HECC staff gave the final draft to the HECC's Board for a final vote, they didn't provide the question and answer section. Nor did they provide the Board with any of the negative assessments of these models. When the HECC's Board voted their approval of the sponsored dual credit and assessment-based learning models, they had no idea that any of the stakeholders had raised an objection. My feedback is below.

Elizabeth,

1. Overview

Last February, with the demise of SB 84, there was talk around the Capital that during interval between sessions that all the major stakeholders would come together to develop a comprehensive plan for accelerated learning. Clearly the former didn't happen, but I was hoping that this document would provide a detailed assessment of the different models and an explicit plan for how to expand accelerated learning. Naturally, I'm disappointed because this document contains neither of these. But it contains an implicit plan—one that is potentially very dangerous for higher education in Oregon.

In January of 2015, OEA produced a White Paper on Accelerated Learning (it is attached). In that paper, we evaluated nine models based on the likelihood that the model could "replicate college-level rigor and a college educational culture." The Eastern Promise and the Willamette Promise were the lowest rated models. We differentiated between the two because the Eastern Promise went to great lengths to ensure quality, while Willamette Promise did not. Besides providing very little, if any, "college educational culture," both models possess a set of reinforcing negative incentives that gave these models a very high probably that, in the long-run, they would not "replicate college-level rigor." In fact, based on our experience with the Willamette Promise, we predicted that these courses will fall far short of college level. As I look through your document, both of your models have this same set of reinforcing negative incentives with little or no countervailing forces.

- 2. The Negative Incentives of the Sponsored Dual Credit and Assessment-Based Learning Models
- a. The Transmutation of Goals

The goal of accelerated learning is to help high school students successfully transition to college. This goal naturally focuses on providing courses that can mirror actual college courses in both academic rigor and college educational culture. The focus is quality. But, this goal can be easily transmuted into a striving to lower both the cost of college and the time it takes to receive a degree. Kris Mulvihill, a director in the Eastern Promise, seems to embrace this goal in a recent article in the East Oregonian. According to the article in 2014-15, high school students earn 17,828 credit through the Eastern Promise "'That's 1.7 million that parents saved in intuition last year said Kris Muvihill'." These types of pronouncements have been routinely in publications of Willamette Promise. Focusing on providing students with an authentic college experience by ensuing that the courses are academically rigorous is diametrically opposed to the goal of providing students with as many college credits as possible. Once school superintends and high school principals have embraced the goal of providing college credits, then the pressure will be on high school teacher to make it happen. And if high schools end up being evaluated with a metric measuring to the number of college credits received, you can bet that the expected value will increase over time; thus, further increasing the pressure on high school teachers to deliver the goods. The transmutation of goals, which has already taken place, is a powerful incentive weighing against quality education.

b. An Open Season for Shopping and Marketing

In the long-run with the transmutation of goals, high schools will be under pressure to deliver a large number of college credits to their students. After all, it will be easy for parents to find online how many credits other school districts are getting their students. Superintends and principles who lag behind will no doubt be questioned about why their schools are doing so poorly. Your model explicitly allows high schools to shop around for those partners who will provide the easiest to pass courses and assessments. Just as importantly, it allows those institutions of higher learning who are the most desperate (more on this later) to aggressively "market" their courses to perspective buyers. "If Institution A's standards are resulting in too many failures, then go with us. We will make sure that doesn't happen." As a result of the competition for revenues, the tendency will be for a reduction in standards. This problem has already emerged between Chemeketa and WOU.

c. A Lack Grading Accountability

In the Sponsored Dual Credit Model, there is no requirement of cross-grading with college faculty. There is no requirement of cross-grading with other high school teachers. There is no oversight what so ever. Communicating standards isn't the same as enforcing standards. As the pressure on high school teacher is ratcheted up, what will be considered college level work will be ratcheted down.

In the Assessment-Based Learning Model, wording is vague. I would argue that there is no requirement here either. On page 20, it states:

"Based on the types of assessments and the preparation and experience of the high school teacher(s), the process <u>could</u> [underlining by KF] include assessment solely by faculty from the college or university, assessment jointly evaluated by high school

teachers and college or university faculty or teaching assistants or regular cross-grading of assessments."

My reading of this section is that <u>could</u> includes the possibility of no cross-grading. In addition, there is no other mention of cross-grading in the document. Thus, one of the possible avenues for meeting these standards is for high school teachers to determine the grades with no oversight from college faculty.

But even if this section means one of three cross-grading options must be chosen, "regular cross-grading of assessments" leaves open the possibility that it could be a small sample of assessments. Given that cross-grading is going to be expensive for the institutions of higher learning, it will most likely evolve to small sample sizes.

d. The High Time and Money Cost to Maintain a Quality Assessment-Based Learning Model

In your model, there will be no state-wide creation of assessments for the Assessment-Based Learning Model. "The programs are designed by the individual college or university." When creating AP exams, the College Board utilizes the expertise of dozens of academics and support staff and has tremendous resources annually invested in the creation of an assessment recognized as an indicator of college-level work. In the Assessment-Based Learning model, one or two college faculty will be required to create quality proficiency assessments equivalent to those offered by AP and IB. This will soon become an overwhelming task, and shortcuts are bound to follow.

e. Dysfunctional Quality Controls

In your models, the insurance of quality rests on shoulders of two groups: The Northwest Commission on Colleges and Universities and the faculty members of the individual institution of higher learning. For institutional reasons, neither group is likely to be up to the task of insuring college level rigor.

i. The implication in your document is that these models will provide college level rigor because the regional accreditor would object if they didn't live up to college standards. However, the Northwest Commission on Colleges and Universities has already made it quite clear that they would be unlikely to rule any program out of compliance if it had the stamp of approval from the State. Thus, the regional creditors can't be counted on to insure the quality of these models.

- ii. There are two problems with relying on faculty to up hold quality:
- Over the past 15 years a couple of the four year institutions have been threatened with extinction. Openly discussing whether to do away with an institution and then not doing so quite naturally produces a serious of bad incentives. The institution is left with need to generate revenues and to fulfill some function within the educational mission of the State. If the university were to be eliminated, a number of the full-time faculty would never work academia again, except maybe as part-timers. Everyone in the institution knows, at some level, that they must fight for survival. These are not the people who are going to take a hard line on quality. Especially when it isn't going to directly affect their institution. WOU is one of these institutions,

- and it has aggressively marketed its services. In 2014-15, it was the assessment Chemeketa faculty in each discipline that none of the courses offer by WOU through the Willamette Promise was college level. Not a single one!
- For those institutions that choose to be a part of one or both of these models, the idea is to reap the revenues and other perceived benefits of offering these credits. The idea is not to suffer the initial costs and then have some low quality provider steal your high school partners away from you. Administrators are not apt to put in charge of these programs faculty who are known to be tough grader and contractually protected from pressure. There is nothing in your document that restricts institutions from appointing non-tenured full-timers or part-time faculty to the faculty sponsor positions. For these individuals their continuation and their workload maybe contingent on the "success" of these programs. If these faculty stand up for quality, they do so at their own peril. In 2014-15, many of WOU faculty representatives to the Willamette Promise Learning Communities were part-time faculty members.

3. Conclusion

While your document doesn't put forward an explicit vision for accelerated learning in Oregon, there is an implicit one. The negative incentives in your proposed new standards in combination with the statewide push for an expansion in accelerated learning will produce a Gresham's Law of higher education. Where the lowest quality accelerated learning options—Sponsored Dual Credit and Assessment-Based Learning—will gradually crowd out higher quality options. Furthermore, the lowest quality providers of Sponsored Dual Credit and Assessment-Based Learning will gradually crowd out the higher quality providers. The result will permeate its way throughout the entire higher educational system in the state of Oregon. There is a reason why NACEP hasn't given these kinds of models its stamp of approval. Sponsored Dual Credit and Assessment-Based Learning are dangerous educational experiments with a high probability of doing serious damage to our educational system. Once turned loose, it will be very difficult to put this genie back into the bottle.

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