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May 13, 2019

Dr. Elizabeth H. Sibolski, President
Middle States Commission on Higher Education (MSCHE)
3624 Market Street, 2nd floor West
Philadelphia, Pennsylvania 19104

Institutional Response: MSCHE Evaluation Team Report, April 7-10, 2019

Dear President Sibolski:

On behalf of the Lehman College community, I am pleased to respond to the report of the evaluation team visit to the campus, April 7-10, 2019. Lehman approached the Self-Study process as an opportunity to not only demonstrate compliance with MSCHE standards for accreditation and requirements for affiliation, but also to further advance a meaningful institutional planning and visioning tool for the future. We very much appreciate the work performed by the Evaluation Team and look forward to reflecting on their observations as we advance the development of our next five-year Strategic Plan (2020-2025).

We are especially grateful to the Evaluation Team for recognizing the hard work undertaken by the College to serve a growing number of students and the resilient Bronx community through delivery of a high-quality, affordable education of impact and value.

We also appreciate that the Evaluation Team noted a number of exemplary institutional characteristics and practices, including our College's dedication to student welfare and security; commitment to best-in-class student experience enhanced by technology; strong culture of shared governance and innovative leadership platforms; and data-informed curricular and pedagogical innovations.

As part of our Institutional Response to the Evaluation Team's findings, I am pleased to inform you that Lehman College agrees with and accepts the references to *Exemplary/Innovative Practices* related to Standards II, III, IV, and VII; the *Suggestions* related to Standards I, II, III, IV, V, and VII; and the *Recommendations* related to Standard V. Furthermore, the College does not dispute the *Recommendations* related to Standards II, III, and VI, though the basis for the underlying concerns are unclear given the totality of the evidence presented to the Evaluation Team.

Lehman, however, respectfully disagrees with and hereby contests the Evaluation Team's judgment that the College "does not appear to meet" Standard V in respect to the assessment of general education and institutional effectiveness. This assertion is discordant with the evidence presented by Lehman and, most significantly, with the concomitant conclusion of the Team (which we support) that "[i]n the team's judgment, the institution appears to meet Requirements of Affiliation #8, 9, 10" (p. 21).

In support of this position, the following sections present additional context on Lehman's embrace of continuous improvement, enabled by a culture of assessment, general education assessment, and institutional effectiveness efforts. Concerns related to the evaluation process are also explored.

Lehman's Culture of Assessment

The Evaluation Team's conclusion that Lehman "does not appear to meet" Standard V fails to capture the full vitality of assessment at Lehman College and is inconsistent with several of the statements in their report, such as:

- *"Multiple examples were provided during our site visit that suggest important data is being collected and used to improve student learning" (p. 18) ;*
- *"[M]any, many faculty are genuinely engaged in assessment activities for the sole purposes of improving student learning" (p. 18);*
- *"Lehman has effectively pursued initiatives based on the results of past national surveys" (p. 8);*
- *"The institution has clearly documented and communicated planning and improvement processes that involve constituent participation and use of assessment results." (p. 22)*

In identifying these key attributes, the Evaluation Team acknowledges Lehman's established culture of assessment, which has existed since at least 2009 when a program of annual Assessment Workshops was begun and college-wide assessment was initiated. Most recently, a day-long Assessment Workshop for the 2018-2019 academic year, held on May 6, was attended by over 60 members of the faculty, staff, and administration. Discussions by participants throughout the day revealed a high level of engagement and sophistication in all aspects of the Six-Step Assessment cycle. The call for volunteers and nominations to serve on the new Academic Assessment Council yielded 33 faculty.

Furthermore, assessment is practiced across the entire campus. Although we are not contesting the *Recommendation* in Standard VI that calls on Lehman to expand its assessment processes to include non-academic and non-student service units, the fact is that Lehman's culture of assessment is also reflected in the work we already do in those areas. For example, Lehman has provided evidence demonstrating that each year, a majority of Administrative Educational Support (AES) Units establish annual goals and targets supportive of the Strategic Plan (p. 19) — 91% of AES Units submitted goals and objectives during the 2017-2018 assessment cycle. Moreover, 84% of units submitted completed Assessment Reports, which include documentation of efforts to "close the loop", representing a 17-percentage point increase since the 2015-2016 assessment cycle. Our Library, for example, completes two assessment projects each year related to the College's SLOs and has a 100% assessment compliance rate.

The information presented in the Self-Study and provided during the site visit also indicates how the Division of Information Technology applies the results of annual surveys to drive significant improvement (including development of products like Lehman 360, which have garnered national acclaim) (p. 16). In addition, units within the Division of Administration and Finance administer annual surveys — twelve of which were provided during the site visit as part of a supplemental evidence inventory — that similarly guide continuous improvement efforts in customer satisfaction. Indeed, the concern raised by the Evaluation Team appears incongruent with the several commendations given to Lehman under Standard IV — Support of the Student Experience, as the College has also provided evidence on how it has taken active measures in recent years to harmonize academic and administrative assessment efforts. These include participation of the Dean of Students in the reconstituted Academic Assessment Council (p. 17),

use of national surveys (p. 8), and proactive efforts to collect data on matters related to food and housing insecurity (p. 15), which the Evaluation Team noted the College uses to great effect (pp. 1-2).

In short, the Evaluation Team offered considerable praise to Lehman for its “pockets of excellence” in assessment and institutional effectiveness. This was based on the depth and breadth of evidence provided as part of the Self-Study process, which demonstrated Lehman’s dedication to strengthening its General Education Assessment Plan and Institutional Effectiveness Plan. Yet the Evaluation Team also determined, surprisingly, that our efforts in these areas were worthy of two *Requirements*. Such an action would indicate that “the institution does not meet one or more of the *Standards for Accreditation or Requirements of Affiliation*,” a notion with which we respectfully disagree. More details, drawing from the Self-Study report and evidence inventory, are provided below.

Standard V, Requirement 1: Develop and Implement a Comprehensive General Education Assessment Plan that includes timelines, processes (especially closing the loop activities), and accountability

In the specific case of General Education, Lehman College has a strong foundation and has undertaken a number of efforts to evolve and grow our assessment processes. These efforts are a positive reflection of the College’s commitment to assessment and its determination to improve outcomes, two traits repeatedly noted by the Evaluation Team both during their visit and in their formal report. Systematic assessment at Lehman began in 2009 in response to the previous MSCHE review. At that time, a centralized administrative approach was adopted. It was overseen by a faculty Assessment Council and Associate Provost for Undergraduate Studies and Online Education. Several assessments of General Education were conducted using AAC&U rubrics and reported in our 2014 Periodic Review Report, which was well-received by the MSCHE reviewers at the time.

In 2011, The City University of New York (CUNY) introduced its *Pathways* initiative that provided a structured framework for General Education and standard SLOs that were mandated for all campuses. Each college was permitted to develop/revise courses to achieve the Pathways SLOs. At Lehman, this conversion was done by faculty. Once developed/revised, courses were reviewed and approved by a CUNY Review Committee. In addition to revising the College’s curriculum, the implementation of Pathways also condensed Lehman’s seven distribution areas into CUNY Pathways’ five “flexible core” areas. Two advanced, multidisciplinary courses, LEH300 and LEH301, were reconfigured into a Pathways “College Option” requirement of two LEH courses chosen from five (LEH351-355). These faculty-generated recommendations were approved by the CUNY Review Committee in 2013, and implemented in Fall 2013.

The implementation of Pathways was immediately followed by the college-wide Prioritization process, perhaps the most comprehensive assessment and program review undertaken in Lehman’s history. During Prioritization (2013-2016), the assessment management structure was transformed to a more distributed, decentralized approach. Program-level Assessment Coordinators were appointed, and the Assessment Council was dissolved.

In 2016, the College Senate approved three overarching Institutional Learning Domains: Educated, Empowered, and Engaged, addressed by seven Institutional Learning Outcomes. These were drafted by a faculty committee and approved after extensive consultation with campus stakeholders. Following approval, they were aligned with Program Learning Goals and Pathways requirements. Since then, the Associate Provost, renamed Vice Provost for Academic Programs, continued General Education assessments by assessing writing (still using AAC&U rubrics) over several years to improve the process, eventually expanding the focus from General Education capstone courses to introductory composition

courses. One result of these assessments was that the Writing Across the Curriculum program conducted faculty development workshops. A pilot Quantitative Reasoning assessment was launched and although, as the team noted, its results were not pursued, a subsequent project was undertaken to revise the structure and content of first-year Mathematics instruction, which is still ongoing.

Standard V, Requirement 2: Develop and implement a written institutional effectiveness plan that includes both student learning outcomes and administrative units that includes timelines, processes especially closing the loop activities, full college participation and accountability.

In the specific case of institutional effectiveness, Lehman College already has a framework in place comprised of planning, budgeting, assessment, and decision-making aimed at pursuing its mission, promoting student success and social mobility, and fostering continuous improvement. At the heart of this framework is a plan characterized by regular timelines and activities. This plan includes CUNY's Performance Management Process (PMP), CUNY's budget and financial review process, annual academic assessment, and annual AES assessment. Each of these activities has its own timelines. In addition, Lehman College periodically reviews its institutional policies, as noted by the Evaluation Team (p. 6). All of these components and activities are integrated into the broader planning, budgeting, assessment, and decision-making cycle at Lehman College, which are noted in pages 84-85 of the self-study, and represent our comprehensive approach to institutional effectiveness. These all are closely aligned with CUNY's Master Plan and Strategic Framework and Lehman College's mission, vision, values, and Strategic Plan. Together these elements serve as a full-featured institutional effectiveness plan, although they are not explicitly integrated into a single document – something Lehman is happy to undertake moving forward.

Additionally, Lehman's institutional effectiveness framework was cited in various parts of the Evaluation Team report (pp. 4, 6, 22, and 23). This framework has made it possible to achieve many of the outcomes that had also been favorably cited in the team report, including: enhanced student social mobility (pp. 2-3); 58.3% four-year graduation rate for transfer students (p. 11); development of the Lehman 360 digital platform (p. 12); course redesign in Gateway Math and English courses (pp. 14-15); and positive student perceptions of the Lehman experience and available services (p. 15). Absent an institutional effectiveness framework, the probability that the College would have achieved the student outcome gains documented in the annual CUNY PMP Report, Lehman College's annual Fact Book, and in the Evaluation Team Report, is low.

Opportunities for Improvement

Notwithstanding the above, the College recognizes there will always be many opportunities for improvement. Indeed, as a result of the Self-Study process, we are restructuring our management of assessment based on the current institutional context and what we have learned since 2016. As the team noted in their Report and Lehman outlined in its Self-Study, administration and coordination need improvement. Thus, the reconstituted Academic Assessment Council was formed in Spring 2019, and approved at the May 1, 2019 College Senate meeting as a formal ad hoc Committee of the Senate, ensuring sustainability for the College's assessment efforts by making it part of the formal governance structure. An Assessment Office has been established, and a faculty Assessment Director will be named this Spring to deepen the culture of assessment across the campus and to begin to further harmonize both academic and administrative assessment. These changes are the next steps in a decade-long commitment to improve, refine, and adapt in order to embrace the continuous improvement process. These are in keeping with the spirit of Standards V and VI.

Concerns

As a consequence of the context and evidence summarized above, the Team's judgment on Standard V is surprising. And we are concerned that the genesis for this determination may be a misconstruing of the College's expressed commitment to continuous improvement as an admission of structural failure, as implied by the following statement in the Evaluation Team's report: "*Given the recent reconfiguration of the Assessment Council and recent new hires ... it is clear an examination of the state of assessment of student learning was not sufficient at Lehman ... [and] a new approach needed to be implemented.*" (pp. 19-20).

Indeed, what these changes make clear is that Lehman College embraces educational effectiveness assessment as a most significant process of planning, self-reflection, and renewal, as evidenced by its many successes since the previous 2009 Self-Study and MSCHE visit, recognized in the 2014 Periodic Review Process, and repeatedly cited by the current Evaluation Team — as the Team itself summarized in the following statement:

"Another aspect of the strategic plan helped to shape curriculum renewal and interdisciplinary and integrative student learning across the campus. Using the vision and values of Lehman, they developed traits, Education, Empowered, and Engaged that effectuated change in the classroom through active learning, undergraduate research, and experiential learning opportunities." (p. 4)

We also question the Evaluation Team's interpretation of "inadequacy" as it relates to the identification of student learning outcomes (SLOs) in our course syllabi when the data would seem to suggest the opposite. The report states, "*While courses have been identified as meeting the ILOs for General Education, a number of courses that are marked as meeting this requirement do not contain SLO's or ILO's ...*" while noting in the following sentence that, "*Syllabi for 250 of 287 (87.1%) of lower division General Education courses contain SLOs.*" (p. 17). While there is room for improvement, in the interpretation of the Report, the 12.9% of courses without SLOs seem to weigh more heavily than the 87.1% that have them, even though such a large proportion is emblematic of substantial compliance.

Finally, several comments were made during the site visit about how Lehman could learn from one of the reviewer's institutions. A subsequent e-mail was sent to a member of our MSCHE Executive Committee during the visit with the *General Education Assessment* and *Institutional Effectiveness* plans from a reviewer's campus. This suggests a "one size fits all" approach to assessment that ignores Lehman's complex reality, which includes being a leading transfer destination within the world's greatest and most diverse urban university system — a system committed to seamless transitions for the over 250,000 students it serves. One consequence of this, for example, is that in any given year, only one out of every five of Lehman's incoming students arrive as native freshman who will engage in the entirety of Lehman's General Education program.

Conclusions

Given the sum total of Lehman’s efforts and progress since the last site visit a decade ago – and in light of concrete actions taken by the College leading up to and following the most recent site visit – we respectfully request the Commission to recognize that when a deeply embedded and thriving culture of improving learning exists, employing assessment as a key tool for accomplishing this, the conclusion of non-compliance with Standard V is misplaced.

Clearly, given the totality of the evidence presented, Lehman College is well positioned to update and implement a Comprehensive General Education Assessment Plan and to integrate the various elements of its institutional effectiveness framework into an institutional effectiveness plan, per the Evaluation Team’s observations. The College is also ready to provide evidence of progress in these areas in each Annual Institutional Update as may be required by MSCHE. Hence, it is the College’s strong opinion that the Evaluation Team’s observations in these areas should have been presented as *Recommendations* rather than as *Requirements*.

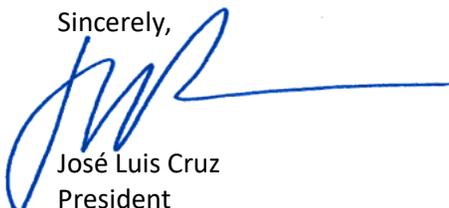
Based on the information presented herein, it is difficult to reconcile Lehman’s efforts and outcomes with the possibility of being found to be out of compliance with Standard V. After all, Lehman College is clearly moving forward and trending upward: financial reserves are among the healthiest in the system; enrollment growth is robust; graduation rates are increasing (the six-year graduation rate for first-time, full-time students in 2015 was 37.8%; in 2017 it was 45.6%; and in 2018 it was 49%); the number of students earning degrees and certificates is growing (setting College records for graduates in both the last two years); and multiple students earning nationally competitive awards speak to the strength of Lehman’s commitment to educational effectiveness (this year including one Soros Fellowship, one Boren Fellowship, two Watson Fellowships, five Fulbright Fellowships, and four Gilman Grants). These are but a few examples of the progress that Lehman College has made since its last Self-Study, and demonstrate that the people, community, and economy of the Bronx and the surrounding region are well-served.

Indeed, Lehman College’s standing as one of our nation’s top engines of social mobility — ranked third in the country for our ability to propel large numbers of low-income students into the middle-class and beyond in a county that has one of the lowest children mobility rates in the US — allows us to state with confidence that “our students are well-served; society is well-served.” As such, it is our position that Lehman has provided the evidence necessary for the Commission to conclude that the College meets all seven of the quality standards of MSCHE accreditation.

Therefore, we respectfully request the Commission to determine that the Evaluation Team’s proposed actions on general education assessment and institutional effectiveness plans be classified as *Recommendations* and rule that Lehman College “appears to meet” Standard V.

Please do not hesitate to contact me if you have any questions or require documentation to substantiate the information presented herein.

Sincerely,



José Luis Cruz
President