

DRAFT

Recommendations to inform accreditation and recognition policy and practice

DRAFT: January 2, 2015

Over the past year, the members of NACIQI identified the need to extend its formal policy agenda. With the **2012 NACIQI Policy Recommendations** over two years old, and with a renewed focus on concerns in higher education and the HEA reauthorization, we set out to identify the new, or renewed, areas about which we would recommend policy change.

To develop our agenda, we drew not only on the **2012 NACIQI Policy Recommendations**, but also on the expertise of a number of policy and thought leaders in higher education through invited policy papers, background readings, and panel presentations. We identified specific areas about which we thought that additional recommendations were needed at this time to simplify the accreditation and recognition process and to enhance nuance in that process, to reconsider the relationship between quality assurance processes and access to Title IV funds, and to reconsider the roles and functions of NACIQI itself. We approached these areas with issues of access, innovation, affordability, and quality in mind. We have not included consideration of what Committee, staff, Department, regulation, or statutory actions would be needed to move these recommendations to implementation.

In advancing the series of recommendations, we commend to the reader the **2012 NACIQI Policy Recommendations**, which provides recommendations that remain important to consider. The new set of recommendations, below, represents additional contributions to the larger policy conversation in service of enhancing our higher education system for all students.

We advance this set of draft recommendations for public comment and input, and look forward to learning from the perspectives of the many stakeholders in the accreditation and recognition process.

Toward simplifying and enhancing nuance in the accreditation and recognition process

To begin, we noted the wide variance that exists in accreditation terminology, processes, and timelines across accrediting agencies. This variance results in confusion and a lack of transparency and does not appear to serve the public interest well. To address this, we see a

33 need for more conformance across the accreditation process, including more concise, factual
34 self-studies and other final reports that are supported by technology, to better serve the public
35 and provide more transparency to the accreditation process. We recommend:

36 **1. Ask accreditation agencies (both programmatic and institutional) to develop common**
37 **definitions of accreditation actions and terms procedures, timelines, process (i.e.,**
38 **electronic) including due process and substantive change.**

39 We also support initiatives to evaluate and assess the impact of Departmental regulations
40 (criteria and recognition procedures) on the accreditation process with the intent to streamline
41 the regulations, eliminate duplication, and to minimize the regulatory burden. We recommend:

42 **2. Require a periodic Departmental review of the criteria for recognition (regulations).**

43 We also noted that the current review structure for accreditation, and also for recognition, is
44 too rigid to adequately address the uniqueness of institutional missions. There is a need for a
45 more differentiated process that allows for different levels of accreditation, for more
46 transparency and openness in the accreditation and the recognition processes, and a greater
47 emphasis on student achievement and student outcomes. Specific standards-setting authority
48 within those mission-essential areas lies expressly with the accrediting agency. We
49 recommend:

50 **3. Re-focus NACIQI reviews to direct greater attention to assessing the role of an**
51 **accrediting agency in ensuring the health and well-being and the quality of institutions**
52 **of higher education and their affordability, rather than on technical compliance with**
53 **the criteria for recognition. These reviews should be supported by staff analysis that**
54 **focuses on the effectiveness of the accrediting agency in performing its work, rather**
55 **than technical compliance.**

56
57 **4. Direct NACIQI to identify the essential core elements and areas of the recognition**
58 **review process that accrediting agencies are required to take into account for**
59 **recognition purposes, focusing of student learning and student outcomes. It is**
60 **expected that NACIQI would identify both the essential areas to include in the**
61 **recognition process as well as those to exclude.**

62
63 **5. Grant accrediting agencies greater authority to develop standards tailored to**
64 **institutional mission; to create different substantive tiers of accreditation; and to use**
65 **different processes for different types of institutions, including expedited processes.**
66

67 **6. Establish that the recognition review process differentiate among accrediting agencies**
68 **based on risk or need with some identified as requiring greater levels of attention, and**
69 **others lesser.**

70
71 **7. Establish that recognition recommendations and decisions include different**
72 **gradations of approval of accrediting agencies and different recommendations as to**
73 **the amount of time within which an agency is allowed to achieve compliance.**

74 In advancing the interest in transparency, we also repeat here a recommendation made in the
75 2012 NACIQI Policy Recommendations:

76 **8. Make accreditation reports about institutions available to the public. Further**
77 **discussion is needed about what reports to include, and about how to increase**
78 **information and transparency while sustaining other critical values in the**
79 **accreditation process**

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81 **Toward reconsidering the relationship between quality assurance processes and access to**
82 **Title IV funds**

83 We noted that routes to accessing Title IV funds are currently restricted to existing systems and
84 structures that may not provide sufficient flexibility for innovation and progress. We
85 recommend:

86 **9. Afford institutions the widest possible array of choice of accreditor for access to Title**
87 **IV funds. Encourage place-based accreditation agencies to expand their scope.**
88 **Provide greater flexibility for institutions to re-align themselves along sector,**
89 **institution-type, or other appropriate lines.**

90 We noted the need to provide ways for new and innovative mechanisms of quality assurance to
91 surface and to serve as potential guarantors of quality. We recommend:

92 **10. Allow for alternative accrediting organizations.**

93 We see an opportunity to create a risk-adjusted approach to accreditation that would free up
94 accrediting agencies and the Department to have more time and resources to focus on
95 institutions that pose the greatest quality concerns. We recommend:

96 **11. Establish less burdensome access to Title IV funding for high-quality, low-risk**
97 **institutions.**

98 We envision that a less burdensome route to Title IV funding access would entail expedited
99 recognition, possibly through a simplified data reporting process. To insure that data is
100 relevant and useful, and that reporting is accurate, we recommend:

101 **12. Before eligibility for Title IV, require institutions to provide audited data on key**
102 **metrics of access, cost and student success. These metrics would be in a consistent**
103 **format across institutions, and easy for students and the public to access.**

104 We see a need for a differentiated approach to access to Title IV funds, such that new
105 institutions could more quickly receive partial benefit from these funds, while still providing
106 some protection for taxpayer investment in higher education. Institutions that pose the
107 greatest quality concerns would receive more attention in the review process, while the burden
108 of complying with accreditation would be lesser for high-quality, low financial risk institutions.

109 **13. Establish a range of accreditation statuses that provides differential access to Title IV**
110 **funds.**

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112 **Toward reconsidering the roles and functions of the NACIQI**

113 We have noted a growing concern that, in many ways, the NACIQI currently has relatively little
114 authority to improve the process and quality of higher education. While the HEOA mandate
115 suggests a central role, the NACIQI is captive to the current process that leaves all decisions to
116 the Department. NACIQI's current role is ministerial, but not significant. The Department does
117 not utilize the expertise of its NACIQI members nor entrust it to make decisions, and as a result,
118 NACIQI's efforts and contributions are, at best, blunted.

119 We recognize that decisions on many of the recommendations above would be necessary to
120 fully shape a more effective role for NACIQI. Pending that outcome, we think it is necessary to
121 clarify and better define the role and each step regarding the NACIQI's role going forward and
122 to ask what assessment options best ensure that an adequate level of quality education is
123 offered by the institutions accredited by a recognized accreditor. We recommend:

124 **14. Reconstitute the NACIQI as a committee with terminal decision-making authority and**
125 **a staff. This will establish NACIQI as the final decision-making authority on accrediting**
126 **agency recognition. In addition, ensure that the staff recommendation is provided to**
127 **the NACIQI for its consideration and that the NACIQI decision will be the singular final**
128 **action communicated to the Senior Department official.**

129

130 **15. Establish that in the event of an accrediting agency’s appeal of the recommendation,**
131 **NACIQI, sans Department staff, will respond to the accrediting agency’s appeal**
132 **submittal to the Department.**

133 We also suggest that the work of the NACIQI could be enhanced with the perspectives of
134 members who are outside of the various parts of the education community.

135 Finally, we expect that facilitating an improved communications process will require better–
136 defined and clearer communication opportunities between the Department and NACIQI and
137 other policy bodies. We recommend:

138 **16. Establish that the NACIQI and the Education Secretary and other Department officials**
139 **meet periodically for mutual briefings and discussions, including policy issues such as**
140 **“gainful employment,” and resulting in policy recommendations.**

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142 **17. Establish that the NACIQI, itself, timely disseminates its reports to the Department**
143 **and to the appropriate Congressional committees.**