

Considering Performance Data, Decision Activities, and Student Achievement: A Pilot Project

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) operates in accordance with Section 114 of the Higher Education Act (as amended most recently by [Section 106 of the HEOA in August 2008](#)) to provide the Secretary of Education with recommendations on matters of quality in higher education, including the recognition of accrediting agencies and the establishment and enforcement of criteria for that recognition.

Over the past several years, the NACIQI has noted the need for further consideration about the process by which accrediting agencies are recognized by the Secretary. From the practice of the NACIQI since the regulation revisions of 2009, from the policy deliberations leading to the NACIQI recommendation reports of 2012 and 2015, and from the recent charge from the Under Secretary, it is clear that there is an important opportunity for more formalized consideration in this review process about student achievement in the agency's accredited programs and institutions as well as other policy-significant student, program, and institutional outcomes and performance metrics.

With this opportunity in focus, the NACIQI plans to pilot a more systematic approach to considering student achievement and other outcome and performance metrics in the hearings for agencies that come before it for consideration of their petition for recognition renewal¹ at its June 2016 meeting. It is anticipated that the information and perspectives gained in the course of this pilot will shape and refine further conversations about the recognition process thereafter.

The approach to be piloted seeks to bring information about agency standards and practices about student achievement into greater focus in NACIQI deliberations about agency recognition and into its policy development discussions. It also draws upon information made newly available in the Scorecard (<https://collegescorecard.ed.gov/data>), and recognizes the important role that recognized agencies play in ensuring improvement among the institutions they accredit that are at risk of falling out of compliance with agency standards.

There are four foci of this pilot: general performance and outcomes of the institutions the agency accredits, decision activities of and data gathered by the agency, standards and practices with regard to student achievement, and agency activities in improving program/institutional quality. Each is outlined below.

General performance and outcomes of the institutions the agency accredits. In the context of a review of a petition for recognition, or renewal of recognition, NACIQI will make use of

¹ The discussion issues and data outlined here are intended to be considered only in the context of instances of a full recognition petition or renewal petition, and compliance reports related to student achievement.

information about the general performance on the dimensions noted below of the institutions it accredits. This information is drawn from the Scorecard.

- % of Pell eligible
- % of Pell completers
- Graduation rates (as appropriate, the 3, 4, 6 year completion metric)
- Debt incurred by students graduating from the accredited programs/institutions
- Repayment and default rates of the students graduating from the accredited programs/institutions

NACIQI will be interested to learn about any available “benchmark” or comparative data related to these general performance metrics. For example, for those agencies that use quantitative measures, NACIQI will be interested to know when the metrics were established, what process was used to determine the cut-off figures, and if there is/has been any periodic analysis to determine the reliability and validity of the metrics used. NACIQI will also be interested to learn how agencies might establish clusters or groups of programs and/or institutions that could be considered comparable if a finer-grained analysis were to be undertaken.

Decision activities of and data gathered by the agency. In the context of a review of a petition for recognition, or renewal of recognition, the NACIQI will inquire about the range of accreditation activities of the agency since its prior review for recognition, including discussion about the various favorable, monitoring, and adverse actions taken. Information about the primary standards cited for the monitoring and adverse actions that have been taken will be sought.

The NACIQI will also inquire about what data the agency routinely gathers about the activities of the institutions it accredits and about how that data is used in their evaluative processes.

Standards and practices with regard to student achievement. The current regulations for agency recognition require accrediting agencies to have standards for the institutions or programs they accredit to address 10 dimensions of quality, including

Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.

In its petition for recognition (or renewal of recognition), each agency provides information about their standards and practices with regard to student achievement. To bring this information more fully in focus in the NACIQI deliberations in the context of a review of a petition for recognition, or renewal of recognition, the review of an agency by the NACIQI will include inquiry about questions such as the following:

- How does your agency address “success with respect to student achievement” in the institutions it accredits?
- Why was this strategy chosen? How is this appropriate in your context?
- What are the student achievement challenges in the institutions accredited by your agency?
- What has changed/is likely to change in the standards about student achievement for the institutions accredited by your agency?
- In what ways have student achievement results been used for monitoring or adverse actions?

Agency activities in improving program/institutional quality. It is recognized that accreditors not only serve a federal gatekeeping role in their enforcement of standards with regard to noncompliant institutions, but also provide a critical quality enhancement function among institutions at risk of falling out of compliance. While the enhancement function is not required for recognition, it is nonetheless an important element in the capacity of US higher education to advance in quality and of interest to the NACIQI as it considers its policy recommendations. To bring this function into focus for its policy development role, the NACIQI will invite discussion about how agencies identify institutions they consider to be at risk of falling out of compliance with agency standards, and how they work to prompt their improvement. This would include consideration of questions such as:

- How does this agency define “at risk” status?
- What tools does this agency use to evaluate “at risk” status?
- What tools does this agency have to help “at risk” institutions improve?
- What is the agency’s view of how well these tools for improvement have worked?

Discussion in this area of the pilot is for policy development purposes only; information received will not be used in NACIQI deliberations about the agency’s recognition, except in instances when agency policies and performance in this area bear on the Secretary’s criteria for recognition regarding monitoring.

Summary. The systematic inclusion of the areas of inquiry noted above will be piloted at the June 2016 meeting of the NACIQI. With this more formalized consideration of information about student achievement as well as other policy-significant student, program, and institutional outcomes and performance metrics, it is expected that the information and perspectives gained in the course of this pilot will shape and refine further conversations about the recognition process thereafter. The discussions and issues described above regarding the pilot of course are in addition to, rather than substituting for, exploration by Committee members of any topic relevant to recognition.