

Remarks Before NACIQI

Issue Three: Accreditor Scope, Alignment and Accountability
WASC: Redesigning Accreditation as an Agent for Public Accountability

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Mr. Chairman, members of NACIQI, thank you for the opportunity to speak before you today. Over the past 24 hours, you have heard many expressions of concern about future directions for accreditation. I serve as President of the Senior College Commission of the Western Association. We accredit 163 institutions in California, Hawaii, Guam and the Pacific Islands with nearly 1 million students, though it is likely the budget cuts in California will shrink that number. We have well over 20 institutions in eligibility and many more exploring accreditation with WASC, and we serve a diverse group of institutions ranging from 35 to 75,000 students. We are not the smallest regional accreditor but by no means as large as HLC or SACS, and we consider our size and location as an advantage, enabling us to experiment and innovate, as I hope to show in the next few minutes. Finally, I am proud to serve an exceptional 25 member commission comprised of presidents, provosts, faculty and public members.

At this and the previous NACIQI discussion of accreditation, accreditation is most often framed as serving dual functions: gatekeeping and quality improvement. I would submit, and my commission would agree, that this framing no longer serves the public or the community of higher education, well. Accreditation needs to clearly define and adopt a public accountability agenda as reflected in the chart I submitted to you. The gatekeeping function is related to minimum compliance and once nearly all institutions have been granted accreditation, they move well beyond the minimum thresholds necessary to obtain accreditation. I would submit that policy makers and the public expect accreditation to define and address key issues and articulate how institutions are held accountable in addressing these issues beyond a minimum threshold level. Thus, I would submit to you that accreditation is not broken, but accreditation is now being called to address a new set of issues that relate to more than the integrity of the federal investment in higher education but to significant public concerns about the effectiveness of our entire enterprise. We have the capability to address these accountability issues if we choose, and my commission and I believe that if we do not, we will not be serving the public or our institutions well.

To put this change in a nutshell, accreditation, at least in certain aspects, needs to shift from a focus on institutional *processes* to a focus on *results*. As I will describe, we at WASC are embarking on an ambitious agenda to do just this. To support these efforts we have just received a grant of \$1.5 million from the Lumina Foundation and anticipate an additional grant this summer from the Hewlett Foundation for an additional \$300,000.

As reflected in the second document I submitted to you, an overview of our redesign process, there are seven key elements to the redesign process we are undertaking. I want to indicate at the outset we do not intend to abandon either our gatekeeping role for new and troubled institutions, nor our quality improvement role for well established ones. But these roles are no longer sufficient to demonstrate fulfillment of our being a reliable authority on institutional quality and integrity. We are embarking on these initiatives because we believe they are the right thing to do. We are mindful of the impact of increased regulations from the Department and our efforts might hopefully delay further regulations to allow innovations such as ours to unfold, but we are not conditioning our initiatives on this outcome. Our goal is to increase our focus on today's and tomorrow's students in order to improve their completion and learning.

These seven elements include the following:

1. External validation of retention and graduation rates. We have increasingly made retention and graduation central to our accrediting process. Our studies how institutions and teams have addressed retention and graduation have shown that institutions need assistance in using the considerable data most have, and in applying available research on improving completion; and that our teams need greater training and consistency in assessing what is "good enough." We believe strongly that graduation rates need to be reviewed in the context of each institution's mission and student characteristics, but there is a need to validate each institution's rates. Some rates are simply not acceptable. We therefore are moving to require each institution to provide us numbers and a narrative on rates at each degree level, disaggregated by gender, race and ethnicity, and SES, with the institution's self-assessment of the appropriateness of these rates, and benchmarks to demonstrate where the institution is in relation to appropriately defined peers. We are working with Peter Ewell and NCHEMS, and other national experts, to design ways institutions can move beyond IPEDS data, and benchmark their results. We intend to develop specially trained

evaluator panels to review these data reports and narratives to determine which institutions need to improve their effectiveness, and provide support systems to assist institutions in their efforts.

2. Externally validating learning results in key competencies. For the past decade the Commission has expected institutions to ensure that learning outcomes are identified for the institution and each program offered, and to assess the achievement of these outcomes and to use the results for improvement. Faculty and administration across our region have made considerable progress in their efforts to respond to these expectations, but, again, our studies have shown that our teams tend to focus on the *process* of assessment more than the *results* achieved. We need to be better able to define what is good enough to warrant a degree at each institution in key areas. Our Task Force on this issue is recommending that we work with multiple approaches that institutions can use in such key areas as writing, critical thinking, quantitative reasoning and information literacy, using externally validated measures to benchmark student learning results or the use of cross-institutionally scored rubrics, as over 2000 institutions are already using as part of the AAC&U's LEAP and VALUE programs. Again, our plan is to specially train evaluators who will review and validate learning results and plans for improvement submitted by institutions, with learning communities around each core competency to assist institutions.
3. Exploring the use of the Degree Qualifications Profile. We have required for many years institutions to define the outcomes of each degree program beyond a minimum GPA or accumulation of credit. The Lumina Foundation has spent over a year developing a framework for associate, bachelors and masters degrees that the Commission has found has great potential to assist institutions and teams identify and align outcomes for the degree. We are undertaking a series of explorations with institutions who are already seeking to apply the Profile in conversations with faculty about the meaning of their degrees. We believe that a common framework which provides plenty of room for innovation and adaptation could serve to build a better understanding of what a degree means, and identify criteria for different degree levels. Such a framework is all the more important as wholly new delivery models and institutions come into operation.
4. Increasing the transparency of the accrediting process and accrediting results. One of the most common criticisms of accreditation is that results are not transparent. Our

Task Force on Transparency and Public Reporting is recommending that we make all of our action letters public – they are typically 3-8 pages long, and that we work with institutions to develop a set of quality indicators that are reported publicly following each comprehensive review.

5. Developing multiple levels of accreditation. The Commission recognizes that all institutions go through the process and end up with a similar action differentiated primarily by years between comprehensive reviews and the types of follow up action. We believe that there should be recognition of exemplary performance resulting from the institutional review process and, beyond that, there might be special areas of commendation that institutions could seek on an optional basis, similar to the special Carnegie recognition for community engagement.
6. Special protocols for for-profit institutions. We recognize that large, publicly traded or venture capital corporations pose a special challenge to our review processes. We are therefore moving to institute special approaches – such as working with a major auditing firm to review the finances of such operations, to substantially increasing our reviews of admissions and financial aid practices, and to setting special guidelines on governance issues.
7. Significantly redesigning our evaluation process to move our focus away from the “do it all visit” to the development of a multidimensional review process adapted to institutional history, performance and risk. We believe we need to rely more heavily on already existing publicly available data where possible, periodic offsite reviews rather than a single offsite and onsite review every decade, and redesigned visits based on data analysis, clearly defined and limited quality improvement efforts and a risk adapted process. For some institutions, the process and visits would be extensive and intense; for others, highly focused and limited.

Together, these changes will lead to a redesigned accreditation process that will be accountability centered, transparent, adaptive to institutional history and performance, and far more cost effective to institutions and to the public. We acknowledge our initiatives are bold, in some cases untested, and even controversial. We are committed to situating standards within the institution and believe strongly that is where standards need to be set – and our role is to validate that institutions are defining performance at appropriate levels when compared externally. But it is not the role of the Department or the Congress to set these standards.

I would add that other regions are attempting or have already instituted redesigns of their processes as well. We each are attempting to serve the needs of our institutions and the public.

Thank you for your attention. I look forward to your questions.