

N A C I Q I

June 2011 Policy Agenda

Draft

ISSUE #1: REGULATORY BURDEN and DATA NEEDS. This issue focuses on the concerns about the regulatory burdens and costs of accreditation to institutions, students, and taxpayers. Also included are questions about the nature, quality, and quantity of data gathering and reporting required on the part of institutions and accreditors.

Topics of interest in this area include:

Decreasing the Regulatory Burden/Scope

1. Reducing regulatory burden and cost (including personnel and opportunity cost) to institutions and taxpayers/students
2. Decreasing the escalation of data needs and regulation requirements, and considering the effect of DoE/NACIQI process changes on regulatory burden
3. Examining (and potentially limiting) the standards accreditors must assess when they examine institutions

Working with Data about Higher Education

4. **Considering the assessment of student learning outcomes, there are concerns about imposing common standards.**
 - a. Concerns that there NOT be federal regulation on student achievement standards
 - b. Concern that a common set of standards compromises the diversity of approaches that has benefitted American students for generations; the CLA does not work for all institutions and it will not advance our goals of improving student outcomes! One cannot define a single set of student outcomes that works for every program within a single institution, much less across other institutions in different sectors of higher education.
 - c. The Committee should NOT recommend a set of common standards by which accreditors measure student learning, as suggested as a question in the February Policy Forum memorandum. This approach would compromise the important diversity among educational institutions – a great strength of the American system.
 - d. While the Higher Education Opportunity Act stipulates that accreditors must have standards that “assess success with respect to student achievement in relation to the institution’s mission,” this is not what is happening; accreditors are over-reaching, pushing institutions to adopt quantitative, value-added assessments of student achievement.
5. **Considering the nature of institutional assessment tools and reporting mechanisms**
 - a. Explore whether a clarifying (“tightening”?) rule or regulation is needed for institutions to develop assessment tools that evaluate student achievement according to their own mission and student body.
 - b. Consider requiring accrediting agencies to specify particular mechanisms or measurements that institutions must utilize to demonstrate level of student learning outcomes.

- c. Consider the need to collect, report and analyze completion rates and learning outcome data among peer institutions
 - d. Consider requiring that institutions supply specific information on various output measures found in readily found places.
- 6. Explore and invest in much improved data collection on postsecondary education**
- a. Establishing data definitions – standardize language and metrics
 - b. Funding research in institutional quality, data metrics, in higher education

ISSUE #2: “THE TRIAD” This issue focuses on clarification of the roles, responsibilities, and capacities of federal, state, and accreditor entities in issues of accreditation and institutional aid eligibility. Included are questions about the link between institutional aid eligibility and accreditation.

Topics of interest in this area include:

Clarify the Roles and Responsibilities of the Triad (federal government, state government, and accreditation agencies)

- 1. Defining the triad roles, and considering the division of responsibility and accountability among the three**
 - a. Clarifying the limits of accreditor’ authority and responsibility, and what other entities take up the slack
 - b. Establishing a clearer line between subjects accreditors review and feds review – narrow the accreditors’ job, clarify responsibilities, and reduce overlap
 - c. Clarifying the distinctions between Title IV eligibility and accreditation.
 - d. Clarify the role of NACIQI

Considering the Link Between Institutional Aid Eligibility and Accreditation

- 2. Consider separating quality enhancement and accreditation from gatekeeping and enforcement**
 - a. Establishing and clearly delineating the limits that Federal financial aid place on institutions
 - b. Consider the minimum standards for Title IV eligibility and how can they be clearly separated from accreditation process and conclusions
 - c. Consider decoupling the link between institutional aid eligibility from accreditation and its academic quality role and use measures, such as graduation rates and loan default rates, in establishing institutional aid eligibility.
 - d. Consider make accreditation a necessary, but not sufficient, condition for institutional access to Federal financial aid. Base final determination on a fiscal analysis of default rates, etc. by ED. Allow for “intermediate” sanctions.
- 3. Consider an alternative regulation model for the for-profit sector**
 - a. Consider regulating for-profit companies providing education (or schools owned by corporations) appropriately to their corporate status as to financial, consumer information, governance, etc. issues by Government or another mandated reviewer

ISSUE #3: ACCREDITOR SCOPE, ALIGNMENT AND ACCOUNTABILITY: This issue focuses on accreditor scope, alignment, and accountability. Included are questions about the sectors

and scope of varying accrediting agencies, the alignment of standards across accreditors, and accountability for accreditation decisions.

Topics of interest in this area include:

Scope for Accreditors

- 1. Develop better system for determining scope of each accrediting entity**
 - a. Define what “sector” means
 - b. Consider choice and competition in regionals and nationals
 - c. Consider treating for-profit under a different framework from nonprofits
 - d. Consider moving to a sector-specific national system that would allow each agency to develop standards that are relevant to its own sector, and set thresholds that could be significantly more demanding than apply now within the regionally based agencies,

- 2. Considering the regional organization of accrediting agencies**
 - a. Consider decoupling regional accreditation from geographic scope
 - b. Move from regional and specialized accreditation to sector-based accreditation
 - c. The current structure of regional accrediting agencies is not adequate or effective given the increased size and reach of postsecondary institutions. With such diversity comes increasing difficulty in differentiating between the role of accreditation in assuring basic compliance for the purposes of federal student aid eligibility, and effectively facilitating quality improvements.

Inter-Accreditor Alignment

- 3. Consider establishing alignment of standards and processes across commissions**
 - a. Increase “discipline” and commonality within and across quality assurance processes without increasing rigidity and uniformity.
 - b. Establish baseline consistency across regionals

Accreditor Accountability

- 4. Consider ways to make accrediting agencies more accountable to the public**
 - a. Spell out the things accreditors need not, and should not, do and establish sanctions for catastrophic failure
 - b. Give greater accountability to accreditors themselves
 - c. Make accreditors responsible for institutions they approve – incentive to be rigorous – “skin in the game” – Assign joint and several liability
 - d. Consider establishing some kind of “ultimate venue of appeal” in which accreditation success & failure can be determined.
 - e. Reduce the level of student loan default rates and low employment prospects for graduates of for-profit higher education institutions

Other ideas emerging from the February Forum for reference as needed

Increase consumer information

- Enhancing public information (who and how)*
- Providing much stronger, more nuanced, consumer information*
- Providing more subtle and useful consumer information*
- Requiring far more transparency from institutions and accreditors on outputs/outcomes*
- Increasing transparency concerning purpose and scope of accreditation process*

Tiered System

- Create tiers of accreditation approvals, i.e., create higher levels of distinction*
- Create a “tiered” system of*
 - Accreditation*
 - Recognition*
- Create levels of gradations of accreditation*

Improve Elements of the Accreditation Review Process

- Include more public members on accrediting agency boards*
- Define the nature of peer review and training for teams*
- Provide for special review process for accreditors or schools that are close to “the line,” e.g. in a grey area where they might fail.*
- Ensure good procedures for accreditation*
- Peer Review Panels and Cost: Peer review is essential, but the system and processes are in trouble. For example, team members are often not from peer institutions, and team service has become unappealing because of the heavy regulatory focus and the too frequent occurrence of staff over-riding team recommendations. NACIQI should explore ways in which regional accreditors could address these issues, even to the point of exploring whether there might be better models of accreditation review.*
- From ACTIONS... Expedited alternative for reaccreditation*
- From ACTIONS... Leed-certified peer reviewers*

Diversity

- Address the backlash against efforts to ensure racial and ethnic diversity*
- Access for low income students*
- From ACTIONS... The importance of diversity.*

Cross National

- Include global perspectives with online and global ventures*
- Define what role should accreditation play in crossing national borders*

Academic Quality

- Raise the level of academic quality in all postsecondary education, but most especially in four-year colleges, e.g., respond to Arum’s data and critique.*

New Entrants

- Promote new entrants in accreditation*
- Develop better way to advance new entrants*

Opportunities for Discussion Among A+ Accrediting Agencies (Highly Qualified Accreditors)

- Increase opportunities for discussion among highly qualified accreditor (NACIQI would have to be prepared to make that distinction)*
- Develop a way for NACIQI to recommend highly qualified accreditors*

Policy – Public Understanding

- Improve policy maker and public understanding of accrediting process and role*
- Better inform public/policy makers what accreditation does and doesn’t do*
- Communicate what accreditation is to and for the public*