

APPENDIX N – COMMITTEE’S RANKING OF THE ISSUE CATEGORIES

Initial Issue Categories <ul style="list-style-type: none">• Issues
1. Accreditor Accountability <ul style="list-style-type: none">• Spell out the things accreditors need not, and should not, do and establish sanctions for catastrophic failure (the witness from Ft. Lauderdale, FL)• Give greater accountability to accreditors themselves• Make accreditors responsible for institutions they approve – incentive to be rigorous – “skin in the game” – Assign joint and several liability• Find ways to make accrediting agencies more accountable to the public• Reduce the level of student loan default rates and low employment prospects for graduates of for-profit higher education institutions
2. Decoupling Link Between Institutional Aid Eligibility and Accreditation <ul style="list-style-type: none">• Separate quality enhancement from minimal gatekeeping• Separate enforcement and gatekeeping from accreditation• Establish and clearly delineate the limits that Federal financial aid (student loans, etc) place on institutions, i.e., what are the minimum standards for Title IV eligibility and how can they be clearly separated from accreditation process and conclusions
3. Regulatory Burden/Scope <ul style="list-style-type: none">• Decrease the escalation of data/regulation• Reduce Regulatory burden and cost to institutions and taxpayers/students• Consider effect of our process changes on regulatory burden• Examine (and potentially limiting) the standards accreditors must access when they examine institutions
4. Clarify Triad <ul style="list-style-type: none">• Division of accountability among triad• Greater clarity about limits of accreditors authority and responsibility, and what other entities take up the slack• Define triad roles• Clearer line between subjects accreditors review and feds review – narrow the accreditors’ job, clarify responsibilities, reduce overlap• Explore role of triad “partners” in assessing and enforcing quality/acceptability of institutions

5. Scope for Accreditors

- Develop better system for determining role and scope of each accrediting entity
- Consider treating for-profit under a different framework from nonprofits
- Define what is a sector
- Discuss what “sector” means
- Retain regional organization of accrediting agencies

6. Better Data

- Investigate mechanism for assessing student learning outcomes
- Student Learning Outcome Metrics: Most constituents appear to be interested in strengthening the current culture of assessment; ergo NACIQI should revisit the issue. The federal government cannot regulate on student achievement standards, but in practice institutions are being required to conform to a common set of standards that compromises the diversity of approaches that has benefitted American students for generations. The federal government should not have a role in setting academic standards! 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. 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. Let’s think through a *range* of measures to gauge student achievement.

NACIQI should 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.

- Invest in much improved data collection on postsecondary education
- Collect more and better data
- Establish data definitions – standardize language and metrics
- Fund research in institutional quality, data metrics, in higher education
- Explore data gathering needs
- Collect, report and analyze completion rates among peer institutions
- Collect, report and analyze learning outcome data among peer institutions

7. Diversity

- Address the backlash against efforts to ensure racial and ethnic diversity

<ul style="list-style-type: none"> • Access for low income students
<p>8. Consumer Information</p> <ul style="list-style-type: none"> • Enhance public information (who and how) • Provide much stronger, more nuanced, consumer information • Provide more subtle and useful consumer information • Require far more transparency from institutions and accreditors on outputs/outcomes • Increase transparency concerning purpose and scope of accreditation process
<p>9. Alternative to Regionals</p> <ul style="list-style-type: none"> • Move from regional and specialized accreditation to sector-based accreditation • Reconsider regional orientation of accreditors • End the regional cartel • Choice and <u>competition</u> in regionals and nationals • Current regional structure of accreditation: 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. To wit, applying a set of one-size-fits-all standards to all institutions is not an effective model of accreditation. <p style="padding-left: 40px;">Two specific suggestions for restructuring include 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, AND decouple 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.</p>
<p>10. Inter-Accreditor Alignment</p> <ul style="list-style-type: none"> • Increase “discipline” and commonality within and across quality assurance without increasing rigidity and uniformity. • Pursue alignment of standards and processes utilized by accrediting agencies • Baseline consistency across regionals • Establish minimal standards across commissions
<p>11. Tiered System</p> <ul style="list-style-type: none"> • Create tiers of accreditation approvals, i.e., create higher levels of distinction

<ul style="list-style-type: none"> • Create a “tiered” system of: (1) Accreditation; and (2) Recognition • Create levels of gradations of accreditation
<p>12. Define NACIQI Roles</p> <ul style="list-style-type: none"> • What is the role of NACIQI
<p>13. Improve Elements of the Accreditation Review Process</p> <ul style="list-style-type: none"> • 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.
<p>14. Cross National</p> <ul style="list-style-type: none"> • Include global perspectives with online and global ventures • Define what role should accreditation play in crossing national borders
<p>15. Academic Quality</p> <ul style="list-style-type: none"> • 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
<p>16. New Entrants</p> <ul style="list-style-type: none"> • Promote new entrants in accreditation • Develop better way to advance new entrants
<p>17. Opportunities for Discussion Among A+ Accrediting Agencies (Highly Qualified Accreditors)</p> <ul style="list-style-type: none"> • Increase opportunities for discussion among highly qualified accretor (NACIQI would have to be prepared to make that distinction) • Develop a way for NACIQI to recommend highly qualified accreditors
<p>18. Policy – Public Understanding</p> <ul style="list-style-type: none"> • 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