

National Advisory Committee on Institutional Quality and Integrity

2014 Accreditation Policy Recommendations Initiative

Background Reading Resources: Selected Reports and Concept Papers

NOTE: Reports and concept papers were solicited to assist the Committee in this policy recommendations initiative. The 16 papers contained in this document are in PDF format and bookmarked for ease of access. If the bookmark function did not open automatically upon upload of this document, you can find the bookmark icon (depicted as a ribbon bookmark) on the left side of the screen. Clicking on the icon should activate the bookmark functionality and display a list of authors of the individual papers. Clicking on the author's name, will link you to their report/concept paper.

April 24, 2014

Carol A. Griffiths
Executive Director, NACIQI and NCFMEA
U.S. Department of Education
Washington, DC 20202

Dear Ms. Griffiths,

In response to the invitation from Susan Phillips which you shared on April 3, 2014, this potential contribution to the discussions and deliberations of NACIQI on June 18-19 is based on my position as designer and director of Project Win-Win, an undertaking involving 50 community colleges and 10 four-year institutions that award associate's degrees in nine (9) states. The project ran from 2009 to 2013, was funded by both the Lumina Foundation for Education and the Kresge Foundation, was based at the Institute for Higher Education Policy (IHEP) in Washington, DC, and was evaluated by the State Higher Education Executive Officers.

The objectives of the project were (a) to find former students in those institutions who qualified for but never received associate's (or any other) degrees, had not been enrolled for at least a year, and to get those degrees awarded retroactively, and (b) to identify former students in those institutions who, it was determined by degree audit, were within 9 semester credits of earning a degree, had not been enrolled for at least a year, and to coach them back to school to complete.

The results of this work are reported in *Searching for Our Lost Associate's Degrees: Project Win-Win at the Finish Line* (Institute for Higher Education Policy, October 2013), a printed copy of which is being mailed to you along with a copy of this letter.

What did we learn from this effort that might be considered in NACIQI's discussions on the future of accreditation in the U.S., what recommendations do I offer the Committee, and why?

There are two related questions for NACIQI consideration here, both involving only regional accreditors. While they may apply to national and specialized accrediting organizations, I do not think these are questions that national and specialized accrediting bodies could or should address. That is a matter for NACIQI discussion.

Issue: the Conditions of Degree Awards

This issue arises from the Win-Win experience, based upon which a bill has been introduced in the California State Senate (No. 1425) to standardize local degree award policy in the State's 112 community colleges along "opt-out" lines (see below). Whether the criteria recommended by the Win-Win experience are appropriate for regional accreditors to require of institutions, I contend, is a legitimate matter for NACIQI discussion.



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At present, accreditation standards for the process and conditions for the awarding of credentials say either nothing except acknowledging that they exist at the institution or provide highly generalized directions to institutions that these credentials be awarded when students qualify. Across the 60 participating Win-Win institutions, there were three (3) distinct degree award protocols:

(1) "Opt-In." Under this process, the institution notifies the student that he/she has qualified for the credential in question, but requires that student apply in writing for the degree, oftentimes pay a separate graduation fee, and sometimes, be registered/enrolled in the term in which the credential is to be awarded. If the student cannot be located and informed of his/her degree eligibility, the student obviously cannot respond, and the degree is not awarded. 67 percent of participating Win-Win institutions followed this procedure.

(2) "Opt-Out." Under this process, the institution notifies the student that he/she has qualified for the degree, and that said degree will be awarded on X date *unless the student explicitly declines to receive the award*. If the student cannot be located, the student obviously cannot decline the award, and the degree is awarded, just as it is if the student simply does not respond. 20 percent of participating Win-Win institutions followed this procedure.

(3) Institutional Over-ride. In these cases, the institution determines that a student has qualified for an award and simply grants the degree, whether the student wants it or not. Only 3 percent of Win-Win schools invoked institutional over-ride, or the automatic award of degrees.

The Win-Win process put 41,745 students who had earned more than 60 credits but had not received any degree anywhere over the previous 6-7 years through Degree Audit, and 6,733 of these students were deemed to have qualified for the associate's degree. But of this group, only 4550 could be awarded degrees. The balance, 2183, constituted 32 percent of the degree-eligibles. Of this group 1003 were in "opt-in" schools and could not be located, and another 358 were in "opt-in" schools and declined the degree offer. Of the degree-eligibles in "opt-out" institutions, 248 could not be located, but all of them were obviously awarded degrees.

Question: Is it appropriate to ask regional accreditors to require that the institutions in their oversight maintain current and verifiable locating/contact information for all students, present and former (and, if former, for what period of time, e.g. 5 years)?

Question: Is it appropriate to ask regional accreditors to consult with the institutions in their oversight on the pros and cons of moving toward a local "opt-out" degree award policy?

Under NACIQI's charge, I do not think ED could require regional accreditors to ensure a uniform degree award policy of any kind, let alone "opt-out." But based on their experience, four (4) Win-Win institutions have subsequently changed from "opt-in" to "opt-out" protocols, with obvious benefits to both the institution and its students, and the California Senate bill certainly endorses a move in that direction. As for graduation fees, Win-Win schools demonstrated that there are ways to collect them without a separate bill, e.g. by building them

into regular student service charges. That is not the business of accreditation, but it should be noted.

I hope you will consider these questions in your upcoming discussions, and would be pleased to elaborate and answer questions, should you so request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clifford Adelman', with a long horizontal flourish extending to the right.

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Searching for Our Lost Associate's Degrees: Project Win-Win at the Finish Line

BY CLIFFORD ADELMAN, PH.D.



OCTOBER 2013

A REPORT BY THE
Institute for Higher
Education Policy

Access and Success
Accountability
Diversity
Finance
Global Impact



The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students. Based in Washington, D.C., IHEP develops innovative policy- and practice-oriented research to guide policymakers and education leaders, who develop high-impact policies that will address our nation's most pressing education challenges.



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Searching for Our Lost Associate's Degrees: Project Win-Win at the Finish Line

BY CLIFFORD ADELMAN, PH.D.

OCTOBER 2013

Institute for Higher Education Policy
Washington, D.C.

Acknowledgments

There are hundreds of people to thank for their contributions to the execution of Project Win-Win, but it is particularly appropriate to offer appreciation to a team that turned a vision into reality.

First, our current state coordinators and data managers: Julie Alexander (Florida), Christopher Baldwin (Michigan), Elizabeth Cox Brand (Oregon), Katherine Finnegan (Virginia), Carrie Henderson (Florida), Gail Ives (Michigan), Robert Kraushaar (New York), Anthony Landis (Ohio), Edwin Litolff (Louisiana: University of Louisiana System), Derrick Manns (Louisiana: Community and Technical College System), Rusty Monhollon (Missouri), Tammie Stark (Oregon), and Diane Treis-Rusk (Wisconsin).

Second, our evaluation specialist at the State Higher Education Executive Officers, Julie Carnahan.

Third, current and former staff at the Institute for Higher Education Policy who played a variety of key roles over the period of time covered by Project Win-Win: Michelle Asha Cooper, Alisa Cunningham, Jennifer Engle, Sara Goldhawk, Tia T. Gordon, Kladé J. Hare, Mark Huelsman, Lacey H. Leegwater, Lisa M. Stewart, and Alexis J. Wesaw.

Lastly, our foundation project officers, Holly Zanville at Lumina Foundation and Caroline Altman Smith at the Kresge Foundation. Without their encouragement, guidance, and support there would have been no Project Win-Win.

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Executive Summary

Project Win-Win recruited 61 associate's degree-granting institutions in nine states—Florida, Louisiana, Michigan, Missouri, New York, Ohio, Oregon, Virginia, and Wisconsin—to (a) identify and find former students whose records qualified them for degrees but who never received those degrees, and retroactively award them their associate's degrees, and (b) to identify and find former students whose records indicated that they were within striking distance of an associate's award, and bring them back to school to complete the few credits they had left to qualify for the award.

Each participating institution had two years to complete these tasks, and 60 of them did, to different degrees. In addition, four of these institutions took on a second project, a version of what contemporary discourse calls “reverse transfer,” an attempt to transfer back credits from a four-year college to the community college from which currently degree-less students had come. In each of the “Win-Win” versions of these credit reallocation efforts, only two institutions are involved: The community college and the principal four-year school to which its students transfer. We called this a “feeder” relationship.

The Core Win-Win Sequence of Tasks

The core Win-Win sequence of activities for each participating institution consisted of five steps:

1. Define a student “universe of interest” in the institution's data files composed of students who had entered any time after the fall term of 2002 in terms of (a) a minimum earned-credit threshold of 60, (b) a cumulative GPA higher than that required for graduation, (c) no credential of any kind ever issued by the institution to the student, and (d) the student had not been enrolled at the school for at least one year working backwards from the institution's Win-Win start date.
2. Match the universe of interest against both state and the National Student Clearinghouse (NSC) data bases to eliminate students who had already earned a degree elsewhere or were currently enrolled elsewhere.
3. Perform a degree audit on the students remaining under consideration to yield one of three judgments for each student: eligible for an associate's degree award, potential completer with nine or fewer credits to go, or neither of the above.
4. Find the “eligibles” and award them retroactive associate's degrees.

5. Find and contact the “potentials”; persuade them either to return in the current academic year or to commit to return in the following year.

Needless to say, there were considerable variations in the ways 60 completing institutions redefined and carried out each of these steps, and a considerable amount of student mobility they discovered along the way: Transfer-in to the initial institution, transfer out, and currently unlocatable—features of student histories that only complicated the five core tasks.

That so many errors and mismatches were made in the process demonstrated how few of these institutions were prepared to track their own students, and how few state data systems were in any condition to help them out. New variables had to be created in local data bases, students slipped through faulty algorithms, duplicate records sprouted, and required agreements for data exchange between two- and four-year sectors in the same state never materialized. It is no wonder that the initial universe of interest constantly swayed between 126,000 and 134,000 before settling at 128,614—and that was just the beginning of variations the project witnessed.

The Fulcrum of the Degree Audit

As anticipated, the degree audit process was the most labor-intensive, time-consuming, and critical step in the Win-Win sequence. State matchings, NSC matchings, and idiosyncratic institutional interpolations reduced the initial universe of interest from 129,000 to 41,000, but 41,000 is still a lot of students—even across 60 institutions—whose records merited the kind of attention they should have received when the students were last seen at those schools. Software systems may have helped somewhat in the degree audit process, but ultimately virtually all institutions turned to hand-and-eye, line-by-line examination of student transcript information.

Issues such as which associate’s degree template should be used, which catalog requirements should be in force in the examination, what course substitutions were possible, which non-academic degree requirements (such as swimming tests) could be ignored, and whether multi-institutional attendees met residency requirements at the cognizant institution—all these arise in degree audit, and all are beyond the reach of software programs. Institutional academic integrity is at stake in degree audits. As one participant put it, “You can’t let a machine award degrees.”

Result of Degree Audits and Their Follow-up Actions

Integrity is very much evident in the results of degree audits. No institution passed out empty pieces of paper; nobody was indiscriminate. The degree audit outcomes speak eloquently to the core characteristics of this undertaking. These audits produced the following results:

- 6,733 eligible for the award of an associate’s degree
- 20,105 potential completers
- 14,872 neither eligible nor potential

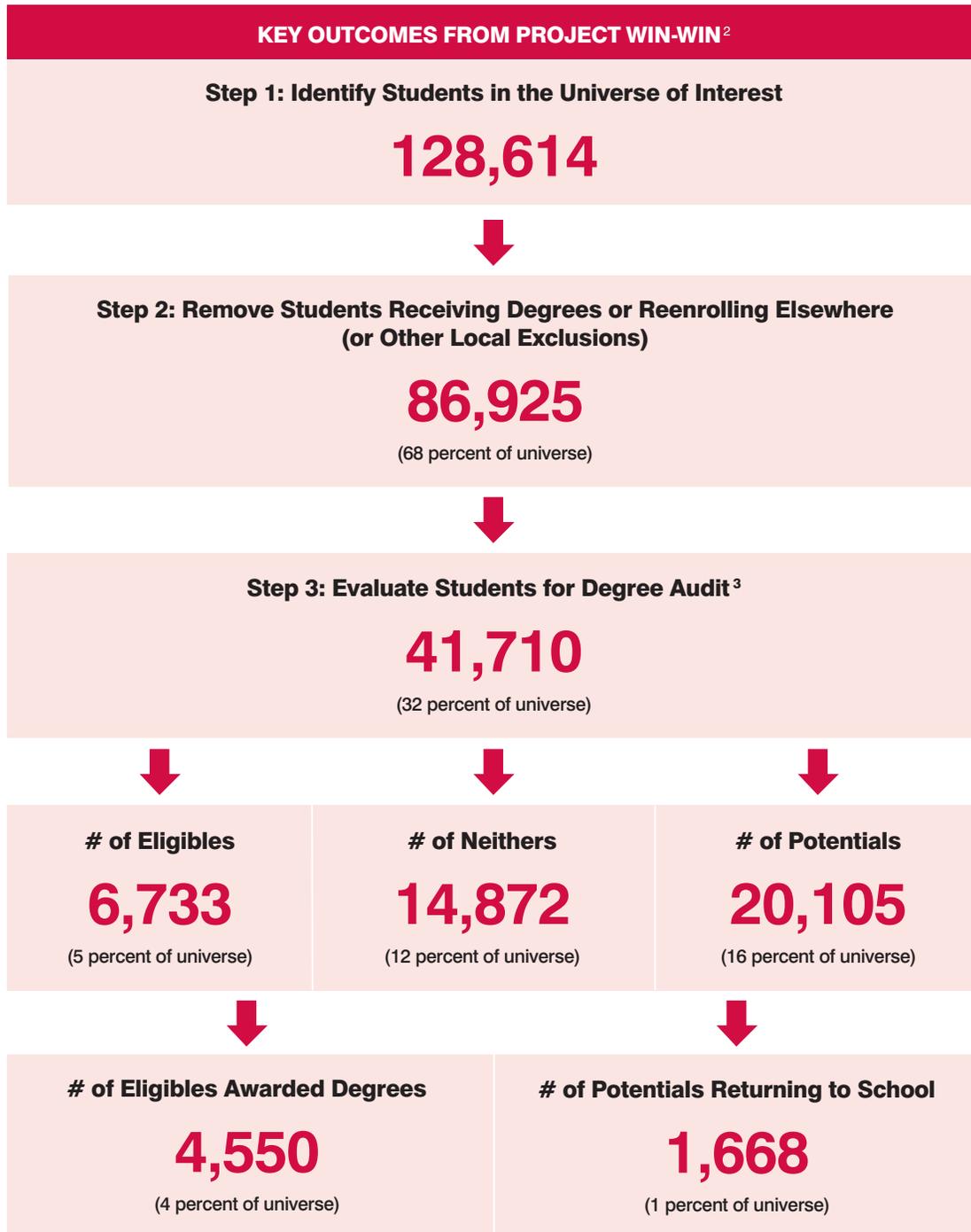
The 16 percent eligibility rate exactly matched the 16 percent predicted on the basis of earlier Win-Win type undertakings grounded in analyses of the U.S. Department of Education’s transcript-based longitudinal studies. However, only 4,550 of the eligibles actually received degrees, principally because 67 percent of Win-Win projects were housed in institutions with “opt-in” degree award policies that required the student to apply for the degree (and often either pay a fee or be enrolled in the term in which the degree was awarded), and 23 percent of the eligibles could not be located. Some 26 percent of the potential completers could not be located either, meaning that advisors could not even attempt to persuade them to return to school. A somewhat overlapping 26 percent¹ were missing at least one mathematics course required for graduation, hence were unlikely to return, and were placed low on the priority contact lists. Of more than 20,000 Win-Win “potential completers,” only 2,076 have either returned to school or indicated their intention to return.

Of students in the four feeder projects, 18 percent of those who went through degree audit were found eligible for degrees. However, only 25 percent of the feeder universe of interest even reached degree audit (versus 34 percent for the Win-Win universe as a whole)—partly because, under the Family Educational Rights and Privacy Act (FERPA) guidelines, students did not grant permission to be included in the community college’s cohort, and partly because the four-year college partner removed students from consideration.

FIGURE 1 sets forth the sequence of Win-Win numbers, from the universe of interest to degree awards and the returns of potential completers. Numbers, however, are less than half the Win-Win story.

¹ We did not ask institutions to determine the overlap, hence cannot provide a specific figure.

FIGURE 1



² 60 of 61 institutions reporting through degree audit; 59 reporting number of eligibles awarded degrees and potentials returning to school.

³ Some students were identified for degree audit after the matching process; others' degree audits could not be completed, for a total of 41,710 students evaluated through degree audit.

The Rest of the Story: What Win-Win Learned, What it Recommends

Win-Win's work to identify and assist as many qualifying students as possible to earn associate's degrees revealed much about the promises and pitfalls of degree completion, lessons that are more than relevant for state systems and institutions that would undertake similar efforts. Here is a sample of what we learned and what we recommend:

Get the right team in place, and keep it there. Each phase of Win-Win requires appropriate expertise in lead roles, but all team members should be working together from beginning to end: Institutional research officers, registrar, counselors and advisors, and academic officers. The registrar has to be the lead, as that office is responsible for degree audit. Counselors and advisors enter the project in the phase of contacting potential completers.

Understand what is involved in tracking students, and build a tracking system. Most institutions and state higher education authorities did not build their data systems with student tracking in mind. Given the extent of student mobility across institutions, sectors, levels, and state borders, it is about time that everybody did so. That means setting common variables, reaching data-sharing agreements within states and across state borders, and making sure that all institutions are participating with full membership in NSC.

Determine and build data capacity from the start. The initial steps of Win-Win require student-level data systems that can construct the universe of interest, including such variables as transfer-in flags, first date of attendance, GPAs in majors where applicable, and so on. The system should be tested before any subsequent steps are taken, otherwise the institution will be stumbling and reconstructing for too long.

Tighten the data parameters for the initial universe of interest. Use a cumulative GPA threshold higher than 2.0, to avoid later problems of students who are just scraping by. Increase the minimum period of time since the student's last term of enrollment from 12 to 18 months as a marker of those who

have truly left, even though they might have gone somewhere else. Both steps will reduce the numbers sent to degree audit, but increase the likelihood of finding both those eligible and potential completers who actually return to school.

Clean up state higher education data. About half of Win-Win institutions that had access to state data skipped matching their universes of interest with state data systems on the grounds of considerable duplicate records, conflicts of records, and unresponsiveness. The Win-Win experience has, in fact, cast doubt on the validity and efficiency of state data systems, even when the state authority performed the initial steps of creating a universe of interest and culling it for students to be sent to degree audit.

Move through the Win-Win sequence at a faster pace. Our project gave each institution two years to complete the process. Given that much time, one confronts considerable changes in student status, resulting in constant recalculations. Institutions that can produce a firm universe of interest within a week can move forward to the more time-consuming tasks of degree audit and contacting potential completers, and still reduce the overall length of the project from 24 to 18 months. And when state data are in doubt or the state matching process is fraught with delay, going directly to NSC for the matching step will save even more time.

Do not exclude students from degree audit on the grounds of financial holds, disciplinary holds, residency questions, or missing curricular pieces. Ultimately, an institution should want to know how many students who would otherwise qualify for a degree could not receive it due to one or more of these non-academic and academic barriers. These factors can be used to prioritize the order of consideration, for those whom the degree audit classifies as potential completers (see below "Prioritize the potential completer population for outreach to increase the odds of return").

Change institutional degree award policies. Opt-in has proven to be a major barrier to degree awards. Partly as a result of their Win-Win experience, some of Oregon's 17 participating

community colleges have already shifted to an opt-out model, under which the institution awards the degree whenever a student qualifies, unless the student explicitly declines. If the students cannot be located to convey their intent, the degree is awarded anyway. More institutions at all levels should follow, and follow, too, the State University of New York practice of building graduation charges into regular student service fees, thus eliminating another tripping point on the way to degree awards.

Prioritize the potential completer population for outreach to increase the odds of return. Some 26 percent of the universe of potential completers was missing a college-level math requirement, and students who have been out of school for a while are not likely to return to complete a math requirement, particularly the default college Algebra. Until the definition of acceptable college-level math has been changed (see section below), this block should go to the bottom of the contact list. For the balance, give highest priority to those with the fewest number of credits left to meet degree requirements, but low-rank the low GPAs.

Develop a more inclusive definition of college-level math. Revising the traditional college-level math requirement to include finite math, statistics, combinatorics, and game theory—and all their combinations—along with the existing qualifying courses, would go a long way toward expanding the pool of potential degree completers at all levels.

Offer potential completers an attractive package. Any package the institution's advisors discuss with potentials should include the following features: A policy on transferring in credits earned at other institutions, a policy on the extent and mechanisms for assessment of prior experiential learning, a list of courses that would satisfy degree requirements for that student, and indications of how these can fit into work and family commitments.

Refine degree audit systems so they can become standard institutional practice. Degree audits also should apply to current students at key points in their higher education careers: At entry for students who transfer in, at a 45-credit marker, and at a point when the student verges on completion of degree requirements. Win-Win participants also recommended student sign-off on degree audits.

Above all, do for your current students what you learned to do for Win-Win students.

The extended narrative that follows covers all these sequences, events, conclusions, and recommendations in considerable detail and with program notes and stage directions from Win-Win participants themselves. Their puzzlements, explorations, mistakes, reconstructions, and breakthroughs have become our learning. We owe them a great deal. 

Project Win-Win at the Finish Line

Degree Completion: The Sound, The Fury, and The Silences

For the past few years, U.S. higher education has been in a fury of focus on degree completion. Legislators, higher education associations, foundations, and the president himself have all set markers. We have seen the birth of Complete College America, Project Degree Completion, the Adult College Completion Network, degree completion projects driven by state legislatures, and hundreds of institutions advertising online degree completion programs for former students who had left our higher education system empty-handed.

Hardly a month passes without a resolution from an august authority. Hardly a year passes without two dozen presentations on the topic at national higher education conferences. Much of the fury has been driven by international comparisons published in the annual *Education-at-a-Glance* by the Organization for Economic Cooperative Development (OECD), even though these comparisons are based on faulty population ratio assumptions and use different time frames for different countries. Yet OECD presents these comparisons as if they are the same, and conveniently overlooks normative changes in the time period of degrees since the 1999 Bologna Declaration began affecting the degree cycles of 47 European countries.⁴

I will not use international comparisons as a bludgeon here. That's been done. Irrespective of what other countries do, U.S. higher education ought to be doing a better job on completions even though it is the biggest ship in the harbor of comparisons and continues to sport a growing population denominator. Wherever they start out in higher education, more of our students—who invest considerable time and money along a path that has established ends and markers of ends—ought to reach those ends and be formally recognized with degrees.

The Associate's: America's Forgotten Degree

But here a silence falls into ambiguity. Which degrees, which markers, are we talking about? The default of our noisy worry is the bachelor's degree. But should the bachelor's degree be our principal source of concern? **TABLE 1**, based on the *Beginning Postsecondary Students Longitudinal Study (BPS)* of 2003–09,⁵ divides six-year completion rates by both age at the date of entrance to higher education and level of institution first attended.

⁴ The U.S. data are for six-year bachelor's completion rates; the French and Dutch data are for seven-year rates; the Finnish rates are for 10 years, yet OECD presents them as if the same time frame applies to each. The normative time for a U.S. bachelor's degree is set at four years, whereas the majority of European "first degrees" (bachelor's) have changed from five or six years to three under the Bologna Process. See Adelman, C. 2009. *The Spaces Between Numbers: Getting International Data on Higher Education Straight*. Washington, D.C.: Institute for Higher Education Policy.

⁵ With the exception of some data provided by Samuel Barbett of the IPEDS staff at the National Center for Education Statistics, all data cited in this document were generated by the online PowerStats application at nces.ed.gov.

TABLE 1

Comparative Six-Year Completion Rates of Bachelor's and Associate's Degrees: By Age at Postsecondary Entrance and First Type of School Attended

	Started College at Age 20 or Less	Started College at Age 21 or More	All Students
Started in Four-Year College and Earned Bachelor's Degree Anywhere	63%	21%	58%
Started in Community College and Earned Associate's Degree Anywhere	21%	6%	14%

Source: *Beginning Postsecondary Students Longitudinal Study (2003–09)*

We could add another dozen tables here from the *BPS Longitudinal Study (2003–09)*, but the two messages of this basic table are inescapable. First, age at entrance makes an enormous difference in six-year completion rates at both degree levels, and it should be noted that the proportion of older beginning students in two-year colleges is much, much higher (37 percent) than that in public four-year colleges (7 percent).⁶ Second, no matter how you slice the data, the associate's degree completion rate for students who start in associate's degree-granting institutions is about one-third that of the bachelor's completion rate for students who start in bachelor's degree-granting schools. And when associate's degree completions are presented in international comparisons with rates in those countries that offer analogous degrees—though with other forms of calculation (most notably in OECD's annual *Education-at-a-Glance*)—our completions look awful, and politicians and pundits bang the table in predictable ways.

Project Win-Win selected the associate's degree as its sole focus. Given the data just cited, is anyone surprised? The associate's is America's largely-forgotten degree—except in the research literature, which is loaded with analyses of community college non-completion. “Win-Win” took a different approach. We were not going to complain or analyze. We were going to do something about it, and, in the process, figure out what we all could learn about doing something about it.

A Pioneering Effort

Quite frankly, nothing like Win-Win had ever taken place over the 40 years of my work in U.S. higher education, certainly not at the scale of its institutional involvement, let alone with associate's

degree templates. Nine pilot institutions in 2009 grew to 32 by 2010 and reached 61 by 2011. What the project called its student “universe of interest” jumped from 10,000 in 2009 to 130,000 by 2011.

Roughly 200 people at those 61 institutions, along with state coordinators and data analysts, worked on various stages of the Win-Win process over that period. Virtually nobody in this group had previously dealt with student tracking questions. Their labor constitutes a classroom for the rest of us. They sweated every ounce of putting it together, and were extraordinarily candid about what one participant called “our bumps and bruises,” about going back to drawing boards, errors in algorithms, conflicting data, decision-rule frustrations, policy misperceptions and their consequences, dead-end searches. Yet they produced results that told them more about how to approach tomorrow's students than they had ever imagined. Their bumps and bruises have produced learning that will become yours.

What happened and what did we learn over the three years of this project? The account that follows draws on discussions with Win-Win participants in the course of 18 site visits during the project, and previous presentations about Win-Win at different stages of its evolution to the American Association of Community Colleges (2011), the Council for the Study of Community Colleges (2012), the Association for Institutional Research (2013), and at its final set of public panels at the Newseum in Washington, D.C., in July 2013. The story is not a simple one.

Win-Win, undertaken in a partnership of the Institute for Higher Education Policy (IHEP) and the State Higher Education Executive Officers (SHEEO), has been funded principally by Lumina Foundation since 2009, and, for Michigan, by the Kresge Foundation since 2011. As of July 2013, all but one of its 61 institutional participants had identified and completed degree audits for 41,000 students, from which the judgments of “eligible,” “potential,” and “neither” emerged, and with 6,700 students deemed eligible for the retroactive award of the associate's degree. The project is in process of being evaluated by SHEEO, and all its pieces have concluded.

If one projects the numbers just cited out across U.S. community colleges and public four-year colleges that award associate's degrees,⁷ one is looking at roughly a 16 percent increase (or 121,770) in the number of associate's degrees awarded by those institutions. This would be a considerable down payment on the “big goals” of increased degree completion set by a variety of authorities. Students with a high number of credits and degree-qualifying GPAs are comparatively easy candidates for credentials—what the casual literature would call “low-hanging fruit.”

⁶ These are separate PowerStats results from the *BPS Longitudinal Study (2003–09)*.

⁷ For these estimates, we are using only associate's degree-granting public institutions because they account for 58 of the 60 Win-Win schools that completed the project. The 934 community colleges (multi-campus institutions report to IPEDS as singular entities) and 312 public four-year colleges in this universe produced 74.3 percent of all associate's degrees awarded in 2011–12. Given the Win-Win universe of institutions, it would not be accurate to include in the base for these projections either private not-for-profit or private for-profit institutions that award associate's degrees.

Project Win-Win involved 61 associate's degree-granting colleges in nine states (Florida, Louisiana, Michigan, Missouri, New York, Ohio, Oregon, Virginia, and Wisconsin) in finding former students, no longer enrolled anywhere and never awarded any degree, whose records qualified them for associate's degrees, and getting those degrees awarded retroactively. Simultaneously, this effort identified former students who were "academically short" of an associate's degree by no more than nine to 12 credits, and sought to find them, and bring them back to complete the degree.

More important than completion, though, are what participating institutions learned about their own data systems, the efficiency of "matching" their student record data with state authorities and the National Student Clearinghouse (NSC), how they define college-level math, how degree audits can account for course substitutions, the efficiency of their locating systems, the effects of residency and recency requirements in an age of multi-institutional attendance, and mechanisms for awarding degrees. This narrative covers all these learnings.

All participating institutions were selected and recruited by central state or system higher education authorities. With the exception of Oregon, where the state agent performed the first three major steps of the Win-Win analysis, each participating institution received a small grant to support its efforts, administered—with other support—by its state system central office. All participating institutions contributed a significant amount of staff time to this effort because they realized the potential of its impact on local graduation rates.

Origins and Current Status of Win-Win

Research conducted by the author in the mid-1990s when he was a senior research analyst for the U.S. Department of Education, was ultimately the source for what became Win-Win. Working with transcript-grounded national longitudinal studies data bases, he pointed out that 15 percent of traditional-age students in any cohort had, eight or 10 years later, earned more than 60 credits with a grade point average above 2.5, yet held no degree whatsoever and were no longer enrolled anywhere. Could this "60 plus" group be brought back to finish?

In 2009 (nearly 15 years after the potential was first identified), and with calls becoming screams for degree completion swirling around, Margarita Benítez (then of The Education Trust and formerly in the U.S. Department of Education) remembered the "60 plus" group. Benítez asked the National Association of System Heads (NASH), which had some money to spare from a Lumina

Foundation grant, to sponsor IHEP to design and manage a pilot project the author called Project Win-Win. Envisioned as a win for the student and a win for the institution, the project would advance on and implement the original vision of completion, but focused at the associate's degree level. The pilot phase headed forward with three states (Louisiana, New York, and Ohio), and designated senior state higher education systems personnel as "cognizant" officers.

There was enough publicity behind the effort to intrigue other state systems. Even as the nine pilot institutions were stumbling through some strange territory, IHEP proposed an expanded framework to Lumina Foundation, carrying forward the three pilot states and expanding their portfolios of institutions, and adding three new state systems: Missouri, Virginia, and Wisconsin. The combined group, consisting of 32 distinct institutions (three associate's degree-granting branch campuses of Kent State in Ohio reported as one, and 13 small associate's transfer-degree-only schools called the University of Wisconsin colleges reported as one), lifted off the ground in November 2010.

Even then, Win-Win expansion was incomplete. In the fall of 2011, three more states came into the fold, each one in a different way. Florida and Oregon were under Lumina Foundation sponsorship, with three community colleges in Florida and all 17 community colleges in Oregon. In both cases, a state authority (and not individual institutions) performed the first two tasks in the standard Win-Win sequence (see "The Core Work of Win-Win"). Michigan, which has no separate higher education authority, came into Win-Win with nine community colleges under the umbrella of the Michigan Association of Community Colleges and with sponsorship by the Kresge Foundation. Win-Win now had a full contingent. There was no more room if the project was to remain manageable, yet other state systems and individual institutions now have the opportunity to capitalize on what Win-Win participants accomplished and learned.

Where does project participation sit at the finish line? Win-Win counts 61 institutions,⁸ of which 10 are four-year institutions authorized to award associate's degrees (three each in Louisiana and Wisconsin, two in Missouri and New York), and 51 community colleges, all performing the core Win-Win sequence. In addition, four of these institutions (Clinton Community College, Monroe Community College, Suffolk County Community College in New York, and South Louisiana Community College) mounted second projects devoted to a direct "feeder" line. This effort followed their degree-less transfer students to a specific four-year school, in hopes of kicking back credits from the four-year to the community college so that the latter could award associate's degrees (see section entitled, "The 'Feeder' Projects").

At a time of heavy drum-pounding from all quarters for degree completion, one would think that this undertaking would receive considerable enthusiasm and support, particularly as it was designed to produce results in two years or less for any one institution. At a time of higher education head-scratching after Congress rejected a national student unit record tracking system, Win-Win was plunging ahead with a model that uncovered the perils of extant data and student mobility. The project indirectly led to others such as the Adult College Completion Network, Credit When It's Due, and the building of coordinated, interstate student-level data mining.⁹ While these are all works in progress, Win-Win is not: It is a plowed and fertile field—and has resulted in the real award of degrees that previously were neither seen nor acknowledged, something few of the other projects have done to date. Maybe they will, and we certainly hope so.

⁸ Two schools did not finish the most critical variables in the process. For one of these, the data presented were so contradictory that they had to be dropped altogether. For the other school, we include all data through the degree audit phase of Win-Win.

⁹ Win-Win will not claim to be the source—or even the principal inspiration—for system completion efforts such as Virginia's "Finish Line" and Florida's "Finish Up Florida," but there is no doubt that, as these undertakings mature, they draw ever more on the lessons of Win-Win. The proximity of Win-Win and these other efforts is too tight to avoid influence.

The Piebald Map of Win-Win Institutions

Win-Win was blessed with a fascinating group of institutions (see **APPENDICES A** and **B** for a full listing, along with their 2011–12 enrollment and associate's degree award data). Although these institutions might not be representative of U.S. higher education or of that segment of U.S. institutions that award associate's degrees, they were a group that provided insights into the main and side streets, the fields and coves of our enterprise. All but two were public institutions, an inevitable by-product of using state system higher education offices to recruit and organize participants. The two exceptions were in Missouri, where the state department of higher education has authority over both public and private (including for-profit) higher education.

The four-year schools ranged from those that historically had not paid much attention to the associate's degree they were authorized to award (Wisconsin), to small technical and agricultural institutions that did (New York), to mid-size universities whose authority to award the associate's faced an uncertain future (Louisiana). They included the one for-profit school in the group (DeVry of Kansas City, Mo.) and the unusual and large private institution that traditionally awarded a considerable number of associate's degrees, partly in its service to military personnel in multiple locations (Columbia College).

For some institutions, the discovery of the associate's degree was an eye-opener in which they took obvious pride. For example, the University of Wisconsin–Stevens Point added a page to its 2012 commencement program listing 145 associate's degree graduates under the Win-Win banner. For others, it was a struggle to incorporate all or part of the Win-Win analytical sequence in their normal operations, let alone to locate degree-eligible students who had most likely forgotten that the associate's was a degree for which they could qualify and receive. It should be noted that institutions whose primary degree purpose lies at the bachelor's level are likely to have special curricular requirements for the award of associate's degrees. For example, the University of Wisconsin–Green Bay asks for four courses within a single discipline, and 10 such disciplines were defined for Win-Win

students and presumably carried forward for future associate's degree candidates. Even so, 10 students in the Green Bay associate's eligible pool wound up with bachelor's degrees.

Authorization of public four-year colleges to award associate's degrees can be contentious in some state systems, but Win-Win's four-year participants generally argued that the availability of the associate's degree, along with a Win-Win type analysis, enabled them to identify and describe their "early leavers," as they put it, see what pieces of degrees these students are missing, and, if they qualify, offer them an intermediate-level credential. If the authority to award associate's degrees is on hold in some state systems, it is expanding in others. For example, all four-year colleges in Ohio will have that authority in 2015. Whether they are all ready for it is another story, one for which the Win-Win experience can offer strong guidance.

The 51 community colleges ranged from the tiny (Tillamook Bay Community College and Oregon Coast Community College in Oregon) to the vast (multi-campus Northern Virginia Community College and Broward College in Florida). They were rural, suburban, and urban. They included community college districts, such as St. Louis, three of the Kent State University regional campuses where the associate's is the highest degree offered, and the 13 small campuses of the University of Wisconsin Colleges that award only the associate of arts (A.A.) and the associate of science (A.S.) degrees, but not any associate of applied science (A.A.S.) degrees or their analogs. Counting all the units and distinct campuses of the 51 Win-Win community colleges, the total is closer to 100.

Considerable variation exists in the organization and what Win-Win called the state "cognizant authorities" of Win-Win community colleges. The nine participating institutions in Michigan were recruited and assisted by the Michigan Community College Association, in the absence of a state higher education authority. To the east, the six participating community colleges in Virginia were assembled by the central office of the Virginia Community College System and stretched the breadth of the state from Tidewater on the coast to Virginia Western in the Appalachian foothills.

All three of the participating community colleges selected by the Florida Department of Education are authorized to award bachelor's degrees in a limited number of fields, though only two of them (Broward College and Indian River State College) have done so to a measurable extent. Even then, the ratio of associate's to bachelor's degrees awarded is very high in both cases—22 to one at Broward; nine to one at Indian River.¹⁰ The State University of New York selections started with schools experienced in Win-Win type projects at opposite geographic ends of the state (Monroe Community College in Rochester and Suffolk County Community College on Long Island), then added two community colleges in between (Clinton and Orange County Community Colleges). In all four of these states, Win-Win has opened the door to expansion to the rest of the states' community colleges.

Oregon set an example of what might happen when an entire state system is involved, as all 17 of its community colleges, behaving as independents under the wings of the state Department of Community Colleges and Workforce Development, are Win-Win schools.

¹⁰ Go to nces.ed.gov/collegenavigator, Florida, two-year public institutions, and, for each school, go to "programs/major." Divide the number of associate's degrees awarded by the number of bachelor's degrees awarded.

The Core Work of Win-Win

All 61 Win-Win schools set out to follow a core sequence of tasks as follows:

Step 1: Identify the universe of interest.

Step 2: Remove students receiving degrees or reenrolling elsewhere from the universe of interest.

Step 3: Perform degree audits to identify “eligibles” and “potentials.”

Step 4: Award degrees to the eligibles.

Step 5: Locate, contact, and reenroll potentials.

A seemingly straightforward process, it actually took each participating institution roughly two years to complete these tasks, for reasons that will emerge in the narrative below. Yet those involved in Win-Win by and large felt that the benefits outweighed their uncalculated cost of labor, as will also emerge in the ensuing narrative.

Step 1: Identifying the Universe of Interest

Each institution determined a set of parameters with which to troll through its student records to haul out an initial universe of interest (in technical quarters, these are known as preludes to data mining). The default set of parameters consisted of five markers:

- The student first attended the institution in the fall term of 2002 or later (the more recent the cohort, the more likely institutions would avoid problems of old credits).
- The student’s record indicated 60 or more additive credits earned, with “additive” defined as “counts toward a degree.”
- The student’s cumulative grade point average was 2.0 or higher, depending on the institution’s degree requirements.
- The student never earned any credential from the institution—no associate’s degree, no certificate, no nothing.
- The student had not been enrolled for the most recent three semesters or their equivalent, working backwards from the fall term of 2010 (for the nine pilot institutions, the marker was the fall term of 2009; for Florida, Oregon, and Michigan, it was the fall term of 2011).

In other words, students in the universe of interest were at or close to a degree-qualifying set of thresholds, had earned nothing, and had not been seen at the institution for a while, hence were assumed to be dropouts.

Variations in the Universe

Did all institutions observe these parameters? No. As one of the Win-Win state data managers reflected, “IHEP gave us a Betty Crocker cookbook, but once in the kitchen, we wound up using family recipes.” For example, the first date of attendance marker ranged from the fall term of 2000 to the fall term of 2005. The resulting “catchment periods,” time between the first and most recent dates of attendance, ranged from five to 8.5 years. The threshold semester-equivalent credit level also ranged from 45 to 64, depending on how many students the governing authority wanted to capture and different degree-qualifying levels. Most institutions used 60 or higher; some changed thresholds during the project.

Two institutions used 2.5 and not 2.0 as the GPA threshold. As one of them explained, the higher GPA ensures that eventual degrees were not awarded to students who “were just scraping by.” There is no doubt that the higher the GPA threshold, the lower the number of students who will wind up going through the labor intensive degree audit. Twelve institutions added residency requirements, financial holds, and disciplinary holds as flags to exclude students from the universe of interest, though this is not the place to do that. Why? Ultimately, colleges would want to know how many students who were otherwise judged eligible for the retroactive award of an associate’s degree could not receive the degrees due to these conditions. Residency turned into a major issue going forward.

Some institutions added curricular requirements to exclude students from the initial count, though again, this is not the most appropriate place to do so. Ultimately, chief academic officers and academic advisers would want to know how many students who were otherwise judged potential degree completers were missing those degree requirements. If they are excluded up front, one never sees the answer to the question, nor fully grasps where, in the curriculum, the degree completion blockage lies.

Data-Mining Time: Applying the Parameters

Each institution took the parameters it had defined and ran through its student records to produce an initial universe of interest. Did that data mining work cleanly? No. As one participant wrote, “We’re in the Stone Age here.” And, as another remarked, “IT [information technology] systems do not understand students with messy lives.”

Some institutional databases could not be instantly manipulated to produce the five variables of the parameters—let alone other variables added by the institution. More than one institution was lacking requisite variables in its student-level data files, and had to create them. Within the same state system, some institutions provided code to others, as when Tidewater Community College furnished it to Virginia Western Community College.

A small number of institutions faced formal internal requirements to request data elements such as transfer-in status and date of birth (to determine current age for the demographic data). This request and approval procedure obviously slows down the construction of an analysis file. To avoid this problem, any institution contemplating an undertaking like Win-Win should make sure that its team includes at least one individual with the authority to access student-level data without any questions or delays.

Disconnections and dissonance marked some institution’s data systems and reporting lines. In many cases, IT, institutional research, the degree awarding unit, and academic affairs were not linked or housed conflicting student-level information. One unit may have records of degrees awarded and another not, so students without degrees show up in a universe of interest and must later be removed when another internal data authority shows these students with degrees.

Some institutions had changed data systems at some time during the “catchment” period and had not fully reconciled the old code with the new code. This changeover influenced the decision of the Florida Department of Education, as it oversaw the first two steps of the Win-Win sequence, to choose a temporal criterion of “students enrolled in the fall term of 2005” no matter when they really entered the three participating Florida community colleges. And what we learned at this stage, from Oregon where the de facto state authority performed the first three Win-Win tasks, is

that not all state postsecondary data systems are designed for student-level tracking. Oregon had to develop new tracking fields within its current system to handle the Win-Win questions. Even in Florida, whose state data are held in high regard, Indian River State College found duplicates and dead students in the core list produced by the state agency.

The results from all this included not only duplicate records, but also students who had already graduated and others outside the catchment period. For example, Suffolk County Community College had 97 of the latter who slipped through the sorting algorithm and weren’t discovered until the degree audit. Meanwhile, some of these students had already reenrolled. The longer it took the institution to produce its universe of interest, the more likely were changes in student status.

The upshot: More than half of the Win-Win institutions had to rerun their universe of interest—sometimes twice—to obtain a usable population. These revisions continued into the final days of the project. In its consequent iterations, the total number of students in the initial universe of interest across all 61 Win-Win institutions and 65 Win-Win projects ranged from 129,000 to 134,000 during the project period, settling (after one school’s data had to be dropped for lack of comparability) at 128,614 (with 1,553 of these students in the four “feeder” projects).

If these 60 remaining institutions produced an initial universe of interest of 128,614, then the 1,246 public associate’s degree-granting institutions in the United States would produce a universe of interest totaling roughly 2,670,400.¹¹ That, of course, does not mean all these people would wind up as Win-Win degree candidates. The matching processes described later would remove more than half of them. In the meantime, closer analysis of the universe of interest introduces the complexifying and sometimes frustrating feature of student mobility into the data chase.

¹¹ In third-grade arithmetic, that is 128,614 divided by 60=2,144, then multiplied by 1,246=2,670,424. Because the universe figure of 128,614 is a full census, a weighted average is moot.

Project Win-Win's First Encounter with Students in Motion

For Win-Win's universe of interest, each institution was asked to determine the number of these students who were transfers-in to their respective institutions and the average number of credits these transfers-in brought with them. Even in Florida and Oregon, where a state agency constructed the universe of interest, the list of students in that universe was sent to the individual institutions to determine transfer status and credits.

These data tell a story of student mobility that permeates the Win-Win population, and condition the way one reads the whole stream of student behaviors examined. It also helps institutions judge whether students meet residency requirements. It sounds like an easy task. For some institutions it was not easy at all: One institution was unable to produce any of these data, and a dozen more that revised their universe of interest had to recalculate transfer-in information.

Don't ask, but to compound the problem, some institutional student-level databases have never included a transfer flag. Such schools had to go back to their student records to create a new variable, and while that task was burdensome, it produced valuable information for them. Within this transfer flag universe, too, lie inconsistent decision rules on the treatment of Advanced Placement and dual-enrollment credits.¹² The situation is sometimes no better at the state data level: As one of the Win-Win state data managers remarked, "No algorithm existed to capture different modes of credits coming in, not that way."

The matter of how many credits came in with the transfer is another problem since data systems record either individual courses, blocks of credits, or blocks of courses with no credit indicators attached. Oregon defined transfer-in in such a way that the institutional reference was only to other Oregon community colleges. Neither out-of-state, private, nor Oregon University system origins for students could be counted. Nonetheless, the executors of Oregon Win-Win data imputed the number of credits transferred in from all sources. Very creative. Likewise, Florida provided a partial account on the transfer-in issue because a prior agreement on the sharing of student information between public two- and four-year sectors was not executed, hence the four-year sector data were missing. In all large projects, such crossed wires are inevitable.

Excluding Oregon, and counting only the 42 other institutions¹³ for which these data are available, 39 percent of the universe of interest students were transfers-in, and brought with them an average of 36 credits. Including Oregon, those figures are 31 percent transfers-in and an average of 37 credits. Those are whopping numbers, no matter how we set the parameters. It is obvious that there is more horizontal transfer going on at the two-year level than mythology would have it. ☞

¹² AP may be a minor issue in associate's degree-granting institutions, but dual enrollment is not. Certainly a decision rule should exist somewhere as to whether these credits, earned while the student was in high school, should be considered as "transfer," depending, of course, on whether the locus of classes was the high school or the community college.

¹³ In all instances in this document in which numbers of respondents are indicated, the reference is to institutions and not projects. Therefore, the reference base is 60. The four feeder projects are not separate.

Step 2: Cutting the Universe of Interest Down to True Size

In its original design, Win-Win institutions were instructed to match the list of students in the universe of interest to two external sources to determine who earned a degree somewhere else after the last enrollment term at the cognizant institution or who was currently enrolled elsewhere. Both these degree earners and current enrollees were then to be dropped from any further consideration under Win-Win.

First, the school was to send its list to the central state data authority, receive back the matches, and drop the matched students from any further participation in the Win-Win sequence. Second, the school was to send the residual players to NSC, which would pick up whoever state data count did not pick up. Subtracting those two groups of matches from the original universe of interest would yield the population subject to degree audit and determination of Win-Win status. It sounds easy, but the question is less one of ease than it is of accuracy. Let's present the results first, then take up the details.

The state matching process eliminated 49,886 (39 percent) of the students in the universe of interest, and NSC match removed another 28,214 (22 percent), for a total of 76,695 (61 percent) out of consideration. If one parses the balance over 1,246 public associate's degree-granting institutions, the 2.67 million former students in the national universe of interest shrinks to 1.04 million who would be subject to degree audit. That does not mean that all these people would be found eligible for retroactive associate's degrees, but it provides a solid estimate of the number of former students of associate's degree-granting institutions who appear to have solid academic records but who haven't been seen for a while, are wandering around empty-handed, and not enrolled anywhere. I repeat: 1.04 million.

Mobility and Matching

And what does the 61 percent matching figure also tell us? More mobility in our student population, hence the difficulty of coming up with clean story lines. Remember that 39 percent of the universe of interest were transfers-in; and now we have 61 percent transfers-out. To be sure, there would be some overlap here if institutions could track all these students, but it is reasonable to claim that half of those who start in associate's degree-granting institutions and stick around long enough to accumulate some 60 credits are multi-institutional attendees. In fact, in the BPS study of 2003–09, 41 percent of two-year college beginners who earned more than 60 credits attended two institutions, and another 23 percent attended three or more schools. Yes, further

divisions of this population are possible, for example, by ultimate degree status, but that would be a distraction, and the BPS parameters are as close as possible to those of Win-Win. The Win-Win community college president who remarked that “we serve a lot of students just passing through” was not exaggerating.

The mobility issue raises the question of which institution is responsible for tracking when the student has attended two or more institutions in the same state. The whole state system has to arrive at a decision rule in this case. Win-Win had only one such system, Oregon, in which all 17 participating community colleges agreed that the “cognizant college” for a given multi-institutional attendee would be the most recent school at which that person earned at least 24 credits. It is possible that some students would fall through the cracks with this decision rule, but given a threshold of 60 total credits, the number of such students would be extremely small.

Win-Win participants themselves have raised the question of student “ownership” in the presence of porous state borders for higher education, the best example of which would be Missouri and Illinois and Missouri and Kansas. With students driving back and forth over bridges, it is very possible that two state systems could claim the same human being, a situation which could lead to problematic tracking.

State Data Matching

Excluding Florida and Oregon, where state system offices also conducted the basic matching process, and Michigan, where there is no state office or state higher education database, 14 Win-Win institutions used state data systems in the matching process, and 17 did not. Of the 14 institutions that used state data, four reported duplicate records, and four had to reprogram student identification numbers, so that the data could be matched.¹⁴ Of the 17 that did not use state data, nearly all cited non-responsiveness among state data authorities, long turn-around times in delivery, or incompatible data formats. What's more, state data had deep holes, as when the local institution had students earning degrees as long ago as 2006 and the state data system did not, or where information from private institutions was not included. All of this leaves consolidated state data reporting in higher education in some doubt.

¹⁴ Some of this reprogramming is FERPA-driven when social security numbers are involved, and the tradeoffs should be marked: As one Win-Win operative involved in the matching process observed, stripping out social security numbers or replacing them with a different ID lowers accuracy but “made everyone feel more comfortable.”

National Student Clearinghouse Matching

The National Student Clearinghouse (NSC) was the next stop for matching. More than 3,300 institutions report student-level enrollment data to NSC, and more than 2,500 report degree data. A few Win-Win institutions initially were not members of NSC, but used the occasion of participating to get on board (given current strictures on national tracking, there really is no excuse for an accredited institution of higher education not to be logged in the NSC universe). Yet one of our institutions, for inexplicable reasons, skipped the NSC match, and, by doing so, wound up with a heavier degree audit load than would have been the case otherwise.

NSC's principal virtues are a turnaround time for matching in less than one week, the inclusion of data from private institutions, and (if one asks) help in writing formulas that will yield outputs that go one step beyond core matching information. Its drawbacks include a three to four month lag in its information database (no worse than state system data, to be sure), and, as Southeastern Louisiana State University pointed out, NSC cannot provide matches to institutions that either have never reported to them or have not reported several years of degree awards. Further, NSC does not produce any data on credits earned or attempted (nor, in fact, do many state data systems, which are dependent on institutions for upflow).

Other Eliminations from the Universe of Interest

Did everybody either follow the sequence of state plus NSC or use either one of them exclusively for matching? No. Some 6,100 students from 13 institutions were "matched out" with reference to sources that were never identified, and another 2,900 from 16 institutions were excluded from subsequent Win-Win analysis. In other words, they were not "matched," but simply removed for what we euphemistically called "local reasons," most of which are very legitimate, because students were deceased, under a disciplinary cloud, international (hence, almost guaranteed neither to be found nor brought back to school), and, more critically, because they were candidates for nursing or allied health degree programs that provided no elasticity for degree audits.

Lessons Before Degree Audit

Despite all the noise about degree completion, most Win-Win institutions had never asked a retrospective question about the histories of students who had not completed degrees. As one institutional representative remarked, "The kid has 72 credits [actually, the average number of semester-equivalent credits for Win-Win eligibles was 81], so there has to be a degree somewhere in there, but we never looked for it." Whether the inquiry comes out positive or not, degree audit is the place for resolution, and there are four lessons to be considered prior to commencing that process:

(1) Anticipating that degree audits would be an incredibly time-consuming, labor-intensive task, institutions had a choice about how many students they wanted to let into the degree audit process. Those who wished to lessen the load put up more restrictions on who was counted. Those who wished to avoid embarrassment by the revelation of degrees the institution should have conferred appear to have changed parameters or rules to allow more local exclusions. These decisions were not neutral in either intent or results.

(2) There are considerable problems in data sharing among institutions and between institutions and state central databases. If a student transferred into your community college from a four-year school, and you didn't have a record-sharing agreement with the four-year college system in your state, how could you know how many credits the student had really earned? Even if the student sent a transcript in transfer, those data might not be recorded in your institution's archive. I know it's hard to believe, but it happens.

(3) It is inevitable that some students will be lost in data transit, and others will appear out of the mists. Comparing the number who should have been passed through to degree audit with the number of those who were, in fact, moved forward, Win-Win lost 70 in five institutions, but gained 122 in four others. In a universe of 41,000, one doesn't worry about such variances.

(4) The institutions that walked through the first two steps of the Win-Win process with minimal hitches were those that had done something like it previously, for a prime example, Monroe Community College in Rochester, N.Y. Oregon reflected that its low count of degree-eligible students (170 out of 6,100 degree audits) was due, in part, to a number of community colleges that had previously undertaken efforts like Win-Win.

Step 3: The Anvil of Degree Audit

By far, the degree audit was the most difficult and time-consuming Win-Win task in determining—despite credits, GPA, and other qualifying features of the original sorting—whether students really should be awarded an associate’s degree, or, if not, whether they were “potential completers” with nine or fewer credits to go (some institutions used 12; Florida used 15 for all three of its schools). Following the audit, students fell into one of three “bins”: 1) Eligible for associate’s degree award, 2) potential completer, or 3) neither.

Sounds easy. It’s not. For example, at one large participating community college district, a student who has been out of school for two or more years must reenroll just to qualify for a degree audit! And one institution’s enrollment services unit would not allow Win-Win registrars to conduct a degree audit at all—until there was a lot of banging on doors. There are local rules and behaviors like this everywhere. One of Win-Win’s state data managers asked, irrespective of local rules, why institutions do not flag degree-relevant credits separately from other credits, a marker that would assist tracking and advising. Yes, the degree audit process basically does that job, but with reference to different degree templates, that is, what is relevant to an associate’s degree in applied science (A.A.S.) in graphic design may not be relevant to an associate of arts degree (A.A.). In answer to the data manager, one cannot determine a truly useful priority. The answers emerge only in context, through a degree audit.

Software Versus Hand and Eye

Even though there are software programs that can comb a student’s record against markers for degree awards, institutional academic integrity is on the line, and, as one of our registrars put it, “You can’t let a machine award degrees.” Five software packages were invoked by five or more Win-Win institutions: Degree

Works, DARS (Banner), CAPP, Jenzibar, and Datatel. Yet nearly all institutions that employed these tools supplemented their findings with hand-and-eye readings; 11 schools used nothing but hand and eye.

The digital world is not going to do what the regional institutions of Kent State University did (see “The ‘Catalog in Force’ Question” section), though the digital world is superficially less labor-intensive. There are exceptions, of course. Mt. Hood Community College in Oregon evidently had enough confidence in its degree audit software to claim a limit of 15 seconds for an individual assessment. But, as its registrar advised, “Make sure your degree audit software system can handle the work, before you assign it to do the work.”

To repeat, even if the software data mine was current and populated with all courses offered by the school, academic integrity requires hand-and-eye reading of each record. If 1,000 or more students pass into degree audit, and auditing each record takes an average of 18 concentrated minutes to work through, the institution is looking at 300 hours labor for these 1,000 decisions. That’s two months for one person who does nothing else, and of course employees engage in other tasks. To put this in perspective, 10 Win-Win schools had 1,000 or more students in the audit queue; four schools had more than 2,500.

Among 60 Win-Win institutions, only one had a single person dedicated to the audit process, and that person spread out the work load by first separating out the eligibles, then taking the balance, sending everyone else graduation applications, and conducting degree audits only when those applications were received. Whatever the risks/rewards of that strategy—losing students with rotten addresses balanced by gaining students who turn out to deserve eligibility—Win-Win thus told its participants to allot six months for pounding the degree audit anvil. We lost more than one invited institution that took one look at the degree audit task and ran screaming out the door even before the process began. One institution hit the degree audit hump and could never resolve who was to be counted or how; another didn’t figure it out until the last week of the Win-Win undertaking, and then had to redo major pieces of its data story.

Who does the degree audit? The registrar is central, but some Win-Win institutions hired temporary employees with the necessary background and knowledge of institutional protocols to handle the load. These included retired deans of students and former institutional research officers—all working part-time.

The Catalog in Force Question

When you pick up a student record, the first questions you ask are (a) what degree(s) am I reading this for? (the default transfer degree, that is, A.A., A.S. or the associate of general studies (A.G.S.), or one of the Applied Associate of Science degrees, such as Medical Technology or Graphic Arts); and (b) which catalog is in force: The current catalog, the catalog at the time the student first enrolled, or the catalog in the term of the student's last attendance? Did all Win-Win institutions ask those questions? No. The easiest route is the transfer degree with the current catalog requirements. The student might have been a candidate for an A.A.S. in a particular occupational field to which the institution would probably respond, "That's nice, but (a) if that was your objective, you are 22 credits short, and (b) we haven't seen you (nor has anyone else) for 18 months, so that degree is off the table."

Yet the regional campuses of Kent State University, which changed their core requirements in math and science during the Win-Win catchment period, took each student record and worked backwards through the changing catalog requirements with a set of decision rules based on advantage to the student. With 1,000 students in line, this was not a fast operation. Tidewater Community College in Virginia took a different approach by starting with the catalog in force at the student's entrance date, then invoking any other catalog in force within the subsequent six years of that point. As frequently noted in this narrative, not every institution does things the same way, but any institution embarking on a project like Win-Win needs to make such decisions at the outset.

The Kent State regionals' procedure is one type of "progressive audit." Another type of progressive audit found among Win-Win institutions was based on changes in major programs. That is, institutions took a template for each of the degrees under which the student had a reasonable chance of eligibility, and ran each of them, in sequence, until a match was found—or not, as the case might be.

Types of Associate's Degrees

Are there any exceptions to the default type of associate's degree? There sure are. For example, in the Oregon Win-Win project, the state agency conducted two degree audits for everybody, one using customized software developed for Win-Win, and a hand-and-eye audit with the Associate of Arts Oregon Transfer Degree (A.A.O.T.) as the matrix. Then the state passed the list of audited students to each institution, which made its own determination of whether each student could qualify for the A.A.O.T. or a different degree.

Even more tellingly, some Win-Win institutions would take a student record, and work through every possible degree for which the student's record might qualify, a process that takes a lot more than 18 minutes. Thomas Nelson Community College in Virginia, for example, had no problem with the first 204 students it put through degree audit, but the next 211 were more difficult, and were set forth in terms of 13 types of associate's degrees according to student "degree plans" before digging into further eligibility issues, degree-type by degree-type.

At institutions with more delimiting policies, variations push the average temporal span of catalog-in-force rules. At Rhodes Community College in Ohio, for example, there is a limit of two years, working backwards from the current term, for catalog-in-force determination, but that bracket differs by major (such as for nursing and allied health), as well as for specific course requirements that date to 2003. At one time, Rhodes had more than 1,100 students in line for degree audits. Given its catalog rules, degree audit would have been a six-month job, but the nursing and allied health requirements were so unforgiving that these

students were simply dropped from consideration altogether, and 1,100 shrank to 334.

There is a core set of default associate's degrees other than the various associate of applied science (A.A.S.) in specific fields, such as medical technology, criminal justice, and paralegal studies. As noted earlier, these are the A.A., the A.S., and the A.G.S.. The first two of these are regarded as default transfer degrees. The status of the A.G.S. is more fragile, and, as testified by Win-Win participants, students do not generally consider the A.G.S. the most desirable degree, partly because some of its credits are not transferable. So if a student is eligible by virtue of meeting requirements for the A.G.S. degree, more than one Win-Win participant advised, do not expect that student to accept it.

A tighter alternative, used by only two Win-Win institutions (Columbia College in Missouri and Northwestern Community College in Michigan) is the associate of science and arts (A.S.A.) degree, a credential requiring half of the credits earned to come from traditional arts and sciences fields. Would the A.S.A. prove to be more transferable than the A.G.S.? That's a research question requiring a much higher volume of cases to resolve than offered within the Win-Win institutional universe.

And, of course, while you were working all your students through degree audit, some of them returned to school, and some even finished their degrees. To be sure, that doesn't happen by the hundreds, but it certainly contributes to numbers that are always in motion. Of the 825 students lined up for degree audit at the Metropolitan Community College District in Kansas City, Mo., for example, 48 reenrolled while the degree audit was running. Across the state in the St. Louis Community College District, 12 of the 380 students classified as potential completers had, in fact, completed while Win-Win was running. Thomas Nelson Community College in Virginia found numerous completers, both at home and elsewhere in Virginia, during both degree audit and follow-up processes. And students in the degree audit universe at their home institution might have completed degrees elsewhere while the process was running. Broward County

Community College went back to NSC for a second time after their degree audit to check on its base, and found more than 1,300 of its degree audit universe enrolled elsewhere, necessitating a last-minute move of this large group from degree audit to the "matched-out" column of data tracking.

Course Substitution in Degree Audits

In the matter of degree requirements, dedicated registrars and former deans also spotted potential substitutions that no software could pick up. For example, a student at a rural community college in Ohio was missing a communications requirement. The registrar noted, however, that the student had earned a B+ in Agricultural Sales. She checked the syllabus for Agricultural Sales and discovered that the course required (a) at least two PowerPoint presentations, (b) a paper with an agricultural products marketing plan, (c) a simulation involving a sales pitch for sausage, and (d) correct written answers on examination questions on links between weather, crop rotation, and prices. That certainly was a collection worthy of satisfying a communications requirement. It did, and the substitution was approved by the academic dean. There were dozens of similar cases throughout Win-Win history. But think about what had to happen, and how much time and effort were involved, especially if you have 1,000 students going through degree audit.

Clinton Community College in New York declined to consider course substitutions at all since each one would involve four levels of approval (faculty coordinator, program coordinator, department chair, and appropriate dean). The Clinton Win-Win operation regarded the process to be "a losing battle in the attempt itself." Other participants would disagree: Northwestern Louisiana State found courses transferred in as a rich source of substitutions, and Tidewater Community College advised that as long as there were "a lot of eyes on the process," substitution maintains its integrity.

Curricular and Non-Curricular Barriers to Completion

For students in the Win-Win sequence whose records were sent to degree audit, remediation is not a principal barrier to completion. Anyone who had crossed the thresholds of additive credits that Win-Win institutions had set—whether 45, 51, 60, or 64—had either conquered or bypassed remediation. So, one might ask, what were the most noted curricular barriers to completion that turned up in degree audits. These include:

- Computer competency, defined as Microsoft Office (and when was the last time you used Access?).
- “College-level math,” defined as college Algebra, when such options as finite math, statistics,¹⁵ combinatorics, game theory, and combinations of these exist (in some A.A.S. programs, applied Trigonometry could be another option).
- Physical education and other health-related courses.

That is not a very strong set of logs with which to build a barrier. And as one Win-Win community college president asked, “If third-graders are doing Smarter Balance and taking keyboarding classes, why do we have basic computer literacy/competency classes as requirements in college in the first place?”

Degree audit judgments do not include (or should not include) “holds” on degrees of any kind (more on that in a moment), but they do take residency and recency issues into account. A student can own 103 credits, but only 14 at your institution, and those 14 do not meet residency requirements (which most regional accreditation agencies define and enforce). Nomads, jumping from one school to another, also may not have fulfilled residency requirements, that is, a set number of the student’s most recent credits that must be earned at your institution.

Chances are that the case of 14 credits results in the judgment of neither eligible nor potential, and the student gets tossed in the trash heap. Yet the latter could result in a judgment of potential completer, if only the student were readmitted and completed enough credits to cross the recency requirement threshold.

There is nothing preordained in a degree audit process, though the tighter the original universe of interest algorithms, the more likely a higher percentage of eligibles will emerge. The Metropolitan Community College District in Kansas City, Mo., for example, sent 825 students into the maw and found no eligibles at all. Zero. New River Community College in Virginia, on the other hand, determined that all 80 students it put on the degree audit conveyor belt qualified to receive degrees. All: That’s 100 percent. Yet there is no evidence that Metropolitan was too restrictive or that New River was too loose. Even with controlled parameters, random bimodal results will sprout in multiple locations.

¹⁵ In their discussions of the college-level math issue, Win-Win participants acknowledged that statistics is often presented in specialized business and allied health context courses, hence cannot be “standardized” in terms of transfer. But the point is something different, as each school can define and defend what it marks as college level math for purposes of awarding an associate’s degree.

Making Degree Audits the Norm

Win-Win has taught us to view degree audits as normal institutional practice. They should be. They are a service to students. As formative summary reviews, they show students precisely where they stand on the road to degrees: What has been accomplished, what remains. Ideally, in communications with the student, the degree audit summaries indicate where transfer credits were placed, where courses were repeated and with what consequences, where credits may have been duplicated, how internships were treated, where the student stands with respect to residency requirements, and what the student should plan given residency requirements.

As summative documents, degree audit reports validate the decision of the institution to award the degree. As a result of doing degree audits for Win-Win students, a significant number of institutions testified that their practices in this field were lacking or too casual. It was suggested that all candidates for any type of associate's degree receive, review, and sign off on a degree audit at 45 credits (some four-year colleges require this verification at 75 or 90 credits). Requiring degree audits at trigger credit markers would certainly improve both institutional provision and student wake-up calls. Given their extensive experience with the complexities of degree audits, Win-Win institutions made a clear recommendation: Audit your degree audit system before you do anything. ☞

Degree Audit Results

The numbers appear three times in this document, and this is an appropriate place for a reminder before we dig into further details and learning. The degree audit of 41,710 students in 60 Win-Win institutions produced:

- 6,733 eligibles
- 20,105 potential degree completers
- 14,872 who were neither

That is, approximately 16 percent of those audited were found to qualify for the retroactive award of an associate's degree, and another 48 percent were deemed within reach of a degree, though to different degrees of "within reach," as we will see.

Step 4: Awarding Degrees to the Eligibles

So you have all your degree audit judgments. What happens to the eligibles? Before an institution can begin to answer this seemingly simple question, it has to come to terms with its own degree-award policy. This task, as it turns out, only complexifies matters.

Uncovering Degree Award Policies

There are three possible institutional degree-award policies: Opt-in, under which the student must accept the degree (and, in a majority of cases, file an application for the degree, often with a small fee) in order for the degree to be awarded; opt-out under which the student is notified that the degree will be awarded on the date of the next commitment unless the student responds that he/she does not want the degree; and institutional override, under which the institution awards the degree on its books without asking the student, notifies the student, and says that the

piece of paper will be delivered only on the student's request, if all financial "holds" are satisfied. When initially asked, at least a third of the institutional respondents were unsure of their own school's policy. When finally pushed to the wall, of 60 institutions responding, 40 (67 percent) were opt-in, 12 (20 percent) were opt-out, and eight (13 percent) were one form or another of institutional prerogative.

However, partly as a byproduct of the Win-Win experience, there has been a major change in degree-award policies across the 17 Oregon community colleges, with two shifting outright from opt-in to opt-out and two from opt-in to institutional override. Mott Community College in Michigan took another approach, offering students the option of opt-out on their application form. So the figures above ultimately will look very different. As one Oregon community college wrote, "We are now going to work to find them, rather than require that they find us." That's a sea change that could ripple across all degree-granting institutions at all degree levels. It is one of Win-Win's gifts to a previously myopic degree completion movement.

The Rest of the Degree Award Story

Both opt-in and opt-out policies require the institution to communicate with students—which means, first, finding them. This issue turned up with a vengeance in the universe of potential completers (see "Find 'Em" below). Some 1,564 (24 percent) of the eligibles could not even be located so they had no chance to opt in or out. Regrettably, 889 (57 percent) of these students came from opt-in institutions, so they were lost for good. In the experience of Win-Win schools, students were notorious for missing graduation application deadlines, and by the time institutions caught up with them, many had transferred or disappeared beyond the reach of any locating service. Hence,

it was recommended to automate the graduation process, with notifications three to four months ahead of deadlines—and repeated one month before the door closes. Few Win-Win schools beyond Oregon have shifted away from opt-in award policies. Doing so would automatically increase associate's degree awards.

Then we have recency requirements, that is, policies that hold the actual award of a degree hostage to the student's being in residence for the term or year during which the degree is awarded or for the student's qualifying record to show a certain number of credits earned at the awarding institution as the most recent credits earned. But to the best of our ability to determine the matter, outside of Oregon, only two Win-Win institutions required the student to register in the term of the degree award (and the Oregon system requirement is one credit during the year in which the degree is awarded). Where separate payments of graduation fees existed, most were waived for Win-Win students. The State University of New York system, including its community colleges, avoids the graduation fee altogether by building these modest amounts into regular student fees so no graduation barrier—better, “trip line”—of this type arises.

Of the 6,733 eligibles, 4,550 degrees have been awarded or students sent into the commencement queue for a 68 percent execution rate. Given the distribution of institutional degree award policies, this is an expected percentage, but should be higher. Win-Win projects, as the reader may recall, each lasted two years. In a four-year institution authorized to award associate's degrees, what would happen to both associate's degree eligibility and degree award rates if the original degree-audited cohort were followed for a longer period of time? Two Win-Win institutions, Suffolk County Community College in New York and Northwestern Louisiana University, both pilot-phase schools that started at the end of 2009, voluntarily did this. By the summer of 2013, Northwestern's associate's degree awards had roughly doubled from their total in the summer of 2011.

A few of the eligibles (503 or 7 percent) had holds on their degrees. Most of these were due to missing transcripts from institutions the student attended prior to entering the reporting institution, and these are usually a consequence of the student failing to pay back loans received while enrolled at previous institutions. Indeed, overdue payments on educational loans accounted for the largest single chunk of these holds.

Why would some students decline to accept an associate's degree? Some just don't want any associate's degree, period—a factor the college completion stampede overlooks. Then, in addition to the specific degree offered, such as the A.G.S., some students are under the impression that accepting an associate's degree will close the financial aid window should they return to school. For federal financial aid, this perception is false: The only degree award that closes the window is the bachelor's. Another false perception is that if students accept the associate's degree, their repayment schedule for federal loans starts immediately, and some students cannot afford to start repaying. But only the fact of not being enrolled triggers the repayment schedule. Since all Win-Win students who reached the degree audit stage have not been enrolled for at least a year, they should have been repaying federal loans anyway. As long as students stay enrolled, they can go on from the associate's degree, to the bachelor's to the master's, and not have to begin repayment.

Some institutions have both philosophical and policy problems with the retroactive award of degrees, and some have solved those problems by either requiring the students to register (with no fees) for the term in which they receive the award or opening the window temporarily for just such awards—and then closing it. Opening and closing windows makes sense particularly in cases where the degree in question is no longer offered, for example, the template for judging the student's attainment was set to an A.A.S. major in printing technology that the institution dropped and merged into graphics and design communications five years ago. In this context it should be noted that no Win-Win degrees were back-dated: They were marked in the year in which they were awarded, and reported as such, even

at the risk of appearing to award fewer degrees in the following year and hence earning the next year's wrath of legislators and local pundits.

Win-Win asked all participating institutions to provide some demographics on the degree-eligible students. On average, eligible students had the following profile: 55 percent were women; 73 percent were White, 9 percent were Black, and 3 percent were Latino; 14 percent were other or unknown; and 63 percent had entered higher education by age 20. That's about on target for everybody, but low for Latinos, particularly given their significant presence in community colleges—which may mean that large numbers are either graduating at higher rates or that they are not getting as far as others in meeting threshold requirements for eligibility. We had also asked after the percentage of eligibles who had received Pell grants, as an attempt to test a proxy for low-income students. It didn't work. After all, a student could be eligible for Pell one year and not the next, and we're looking at anywhere from five to eight years of academic history. What's more, there is debate as to whether a Pell grant as low as \$100 is a true proxy. Some institutions (18 of 60) computed the data anyway, but most resisted, with reason.

Step 5: Locating, Contacting, and Bringing Potentials Back to School

Again, once you have all your degree audit judgments, what happens to the potential completers, the largest group (roughly half) to emerge from the audit process? Unfortunately, many Win-Win institutions took so much time defining their universes and auditing degrees that too few weeks remained at the end of their two-year funding period to address the "potential" population.

Find 'Em!

The first problem is locating the potential completers so that, at the very least, you could contact them with a proposal for finishing the associate's degree in a comparatively short period and, after discussion, walk them through the necessary steps. Win-Win institutions have employed a variety of locating methods and services, including Alumni Finder, People Finder,

Accudata, snail mail, e-mail, social media (not as common as other methods, in part, as Rhodes Community College in Ohio noted, because many students invoke privacy status on social networks), and the National Change of Address processing database the Kent State regional campuses reported to be more efficient than others.

Win-Win participants also offered fulcrums such as working with the Veteran Affairs department to find veterans, and asking state tax offices to forward messages to former students, and, at Northwestern State Community College in Ohio, connecting with the local radio station for public service air time (a strategy that also increased the overall rate-of-return). Despite such efforts, 54 institutions reported 5,241 potentials (26 percent of the total number of potentials) as unlocatable.

Sorting and Prioritizing the Potentials

Let's remember the principal differences between Win-Win and other projects seeking to bring adults with some college back to school to finish. For Win-Win, "finish" means earning the associate's degree—not the bachelor's degree, not pre-baccalaureate certificates, not some piece of paper from an institution of indeterminate status that says you finished a course that may have lasted for three weeks. And in contrast to other completion efforts, the target universe for Win-Win consists of people who already have earned 60 credits but who have holes in their portfolios that render them "academically light," and are targeted for return by the institutions themselves.

Other projects generally do not state credit thresholds, rather wait for people to come in off the street in response to advertisements and recruiting, and do not analyze past records until the student arrives. It is very possible that students with much fewer previously earned credits—say 22, 34, or 17—are more likely to return to school than those with 60 or more. But that's something for a separate research project. The architecture of Win-Win could not address that question.

The Win-Win experience suggests that, after setting aside potential completers who could not be located after three attempts, institutions should prioritize the others by the type of characteristics that might affect their decision to return to school. First priority, illustrated by Columbia College: Flag all potentials with potential holds on degrees as by-products of past due balances/bad debts, and either write them off or place them at the bottom of the contact priority list.

Second suggestion: Set aside those who are missing college-level mathematics in their records, even if you disagree with the way in which your institution defines “college-level math.” The Win-Win data indicate 26 percent of the potentials were missing the math requirement for an associate’s degree. The likelihood that these people will return to school to complete a math course, particularly if they have been on the run in the world (and not in school) for four or seven years, is highly unlikely. Given a large group of potentials, the amount of time devoted to them should vary by chances of reenrollment, and the chances are low for the math-completion group.

Another suggestion from participants would divide the potentials by the number of credits they are academically light, with students who need four or fewer credits receiving the most immediate attention, followed by credit brackets 5–9, 10–12, and 13–15, stopping there. By Win-Win standards, if students need more than 15 credits, they don’t belong in the potential completer group to begin with.

Overcoming a missing mathematics requirement is one of the premier barriers for potential completers to return to college. When a person has been out of school for some time, let alone taken and failed a college-level math course five or six years previously, the math is both forgotten and formidable. The large proportion of this population who fell short of satisfying math requirements stimulated a half-dozen Win-Win schools to rethink what they meant by college-level math. For most community colleges, the default is college Algebra, but as was pointed out above, finite math, statistics (including applied statistics in business or allied health), combinatorics, and game theory are all

college level and could be offered as alternatives to the courses students failed in past years. Of course, these alternatives require academic authority approval, and what would apply to Win-Win students should—and would—apply to everyone.

Quite frankly, what is recognized and credited as college-level math is long overdue for reassessment. There is no question, for example, that the cognitive logic operations that lead through finite and discrete math to computer mathematics constitute a valid path of learning different from the path to and through the infinite math of calculus. As Win-Win’s Wisconsin coordinator noted, if students are missing the math requirement for an associate’s degree and that requirement is rigid, “They are not sure how to return to school.”

The potential completer group is not likely to include significant numbers of former students with marginally acceptable GPAs. As was pointed out by more than one Win-Win institution, students who return to school to raise their GPAs to levels comfortably above graduation requirement rarely succeed. Hence, it was suggested, that if an institution is prioritizing a large number of potential completers, this group should be low ranked.

As of this writing, only 42 of 60 Win-Win institutions have worked through the process of locating and contacting potential completers. There were 16,857 potentials in those schools, of which 1,668 had returned as of this academic year, and another 408 indicated their intent to return at a later date. As one indication of how little work these students faced to complete, Indian River State College in Florida reported that 74 of their returnees had earned associate’s degrees before the Win-Win window closed, and Broward Community College reported 260 who had done the same.

To be sure, even as we write this document, participating institutions are discovering others coming back of their own accord and still others whom the data dragnet had missed turning up in the classroom. Just because the Win-Win project came to a formal ending does not mean that the students in its various universes have stopped moving.

The 16,857 potential completers and the 12.3 percent return rate of this group¹⁶ can help us estimate the potential number of returnees from public associate's degree-granting institutions nationwide. The weighted national estimate of those sent to degree audit was 1.04 million. Of this group, 48 percent were judged potential completers in the Win-Win schools, which extrapolates to 499,200 nationally. If 12.3 percent proved to be returnees, that means the nation has 61,000 students—low-hanging apples—to find and bring back in projects such as the Adult College Completion Network. On balance, 61,000 is not a big group, and return on this scale is doable.

What Does One Do for the Potentials?

If an institution has isolated a promising subset of the potentials that don't need either math or English requirements, what kind of package might it offer? Any discussion with a potential completer should include a number of features, Win-Win participants indicated:

- A policy for transferring in credits earned at other institutions since the student was last enrolled.
- For each student, a list of courses that would satisfy degree requirements.
- A clear policy and position on the extent to which assessment of prior learning (APEL) and other credit-by-examination (e.g., CLEP) the institution is prepared to accept. Many assume the small credit gaps can be closed with some form of assessment or credit for prior experiential learning. However, few Win-Win institutions were prepared to engage in APEL, and, it was observed, students generally do not know the ropes of APEL processes.
- Dependent on prior decisions and approvals, the teaser of contingent financial aid, such as tuition waivers if students complete

their outstanding credits with a grade of “C” or better. If you do that, it was suggested, you would have to use funds from the institution's own foundation (not all schools have them) or quietly draw from private sources since using regular operating funds would draw howls from regularly enrolled students to whom such aid would not be available.

There is a much bigger issue here: What our institutions are doing for Win-Win students they should be doing for everybody, but historically have not. That larger issue raises others, such as the shortcomings of data systems—let alone the kind of monitoring and flexible adjustments that a degree audit provides.

For people who wind up as potential completers with such a short academic space to cover, whatever life events led them to leave the higher education system are difficult to wash away. The University of Wisconsin Colleges located and talked with three-quarters of its potentials; those who declined to return to school (two-thirds of this group) cited full-time work, relocation, and military service as life detours away from reenrollment.

At this stage of any process to bring students back, Win-Win schools testified, the principal players shift from the registrars, IR officers, and academic deans to admissions officers and counselors. A number of Win-Win institutions prepared exemplary form letters/e-mails for this stage of persuasion, but, as the Win-Win's coordinator at Northwest State Community College in Ohio reflected, all it took to motivate the student with two courses to complete was a personal note, and more so, as the degree evaluator at Linn-Benton Community College in Oregon marked, the personal tag of a phone call. Advisers know how to write such notes, and what to say on the phone. They are more than facilitators: They are coaches. Those touches, piece by piece, say that the institution cares. There are, after all, procedural and psychological hurdles to overcome. But for those who express interest or lean toward returning, the principal conflict turns out—not surprisingly—to be work and work hours versus course schedules. To the extent to which their completion templates include courses that are offered online, these conflicts can be mitigated.

¹⁶ Again, basic arithmetic: 1668 immediate returnees + 408 intended returnees=2,076, divided by 16,857=12.3 percent.

The Feeder Projects: Project Win-Win's Version of Reverse Transfer

Many college completion efforts that focus on associate's degrees are predicated on what is assumed to be an easy reappropriation of credits from a four-year college to a community college for students who had transferred to the four-year college, and either subsequently dropped out or had not yet earned any degree.¹⁷ Presumably, these reappropriated credits would allow the community college to award the associate's degree retroactively, depending on local degree award policy.

In that vein, each of the four Win-Win "feeders" followed a simple path from one community college to its traditionally heaviest volume transfer institution, thus avoiding potential quarrels among community colleges over "ownership" of students who had attended more than one:

- Monroe Community College to The College at Brockport, State University of New York (SUNY)
- Suffolk County Community College to Stony Brook University, SUNY
- Clinton Community College to SUNY at Plattsburgh
- University of Louisiana at Lafayette from South Louisiana Community College

Notice the way the last of these is phrased. In the Louisiana case, the four-year college initiated the inquiry, and ironically took some of the zing out of South Louisiana Community College's regular Win-Win inquiry. All cases, however, depend on institutional relationships, student attitudes toward their own educational trajectories, and the potential role of associate's degrees in those trajectories. In the Louisiana case, to set an example, one of the state's two Win-Win authorities produced a mock-up of degree audits using data from both community colleges and four-year institutions. While the example applied to the regular Win-Win sequence, it echoed in the credit reallocation effort: The degree audit was central.

What happened here was complex and variable. For example, 10 percent of the initial records in one of the feeder projects turned out to be duplicates. Grades in specific courses required for degrees and GPAs at one or the other end of the feeder line could easily cut out a third of the original feeder universe of interest.

Even more critical were Family Educational Rights and Privacy Act (FERPA) rules that require students' prior written consent to the sharing of transcripts, even if the purpose is to determine their degree eligibility by the institution from which they transferred. Authorities from the U.S. Department of Education confirmed this application of FERPA, in the course of a webinar on June 20, 2013, hosted by the Western Interstate Commission for Higher Education. A sample of the type of agreement necessary for institutional data sharing appears in **APPENDIX D**.

A Win-Win Case on Long Island

As it turns out, Win-Win has been through FERPA lessons already. Consider how this attempted transaction worked between one community college and its primary four-year feeder recipient: Suffolk County Community College on Long Island and its neighbor (and principal vertical "feed to"), Stony Brook University.

- First, the two institutions had to hammer out a data-sharing agreement that met FERPA standards, which took some time for the lawyers to negotiate. There is a big difference between sharing information among institutions, and the permission to share, a prerogative of students.
- There were 370 students in the original file. Stony Brook removed 190 of them because they were “close to finishing a bachelor’s degree.” Whatever “close” means, you have to respect the decision.
- That left 180 students. But under the FERPA-negotiated agreement, these students had to be contacted and sign a FERPA waiver that allowed their Stony Brook transcripts to be shared with Suffolk County Community College. It was Stony Brook that took the lead in this matter, contacting students and explaining the project and the degree that might be awarded.
- Of the 180 students, 120 agreed and met basic Win-Win criteria to be evaluated. Unless you are living in a FERPA-free environment, you cannot micromanage this student choice. (Monroe Community College experienced a similar decline, from 257 in their universe of interest to 148 agreeing to review for potential award of the associate’s degree.)
- With deans, transfer credit evaluator, and a graduation specialist weighing in, 15 of the 120 students were judged associate’s degree eligible. Bottom line, and without marking all the details—courses flunked at Stony Brook, courses that would not transfer, transcripts previously sent to Suffolk but without any effect on degree requirements, and so on—the 15 eligibles were sent letters under a degree opt-out option. Of those remaining, 35 were treated as potential completers and 60 as nowhere near any completion anywhere.

Throughout all of this, the genuine joining of forces between Suffolk and Stony Brook was essential, as was, Suffolk’s registrar reminded us, “A central person, the graduation specialist in charge of both capturing and consolidating data and controlling the process.” The University of Louisiana at Lafayette offered the same sentiment, observing that the joint feeder project with South Louisiana Community College allowed two sectors to work on a challenge that “required information exchanges and joint decision-making.” In the end, out of 180 subject students, Suffolk got 15 completers. That is an 8.3 percent return on investment of a lot of time, compared with the 14.6 percent return on Suffolk’s regular Win-Win sequence.

In a similar case, Virginia community colleges judged this kind of effort questionable. When asked about the potential of future feeder relationships, the Virginia system concluded that even if the effort were classified under “research” and the student was nonetheless contacted to request permission to examine records, the institution would be on shaky legal ground.

Legislative mandates for the credit reappropriation process provide momentum, but conflicts of authority over residency requirements remain. When Missouri and its accrediting body, the Higher Learning Commission of the North Central Association agreed on a 15-credit minimum as a threshold for residency, it was agreed that this low marker, in practice, would be rare. In other words, most students affected by credit return would evidence much more than 15 credits at their base community college. It is an issue all those engaged in credit reappropriation should resolve in a persuasive manner. 

¹⁷ This phenomenon is commonly dubbed “reverse transfer,” a term Win-Win initially avoided in favor of “credit kickback.” The term reverse transfer has been historically used to describe students who start in a four-year college, and then move to a community college (as do 26 percent of SUNY students, compared with 35 percent moving in the other direction, as reported by Win-Win’s New York coordinator). However, we came to recognize that the term “kickback” would not be well received in state legislatures, and have dropped it, but still will not replace it with reverse transfer. SUNY has it right.

Where Do We Stand After All This: In Numbers and in Learning?

The above narrative has spilled out a lot of numbers along the way, and is worth a slightly elaborated version of the figures presented in the executive summary. The numbers are easy to recite:

- **128,614** students in the universe of interest in 60 institutions.
- **86,925** eliminated from the universe of interest by determining they had either earned degrees elsewhere or were currently enrolled elsewhere, or (in 15 institutions) by local decisions based on changing or special program degree requirements.
- **41,689** set for degree audit in 60 institutions.
- **41,745** actually sent to degree audit (somehow, 56 students ducked under the algorithm line).
- **41,710** completed degree audits in 60 reporting institutions (including a few students from outside the degree audit line who somehow turned up).
- **6,733** eligible students (16 percent of those who went through degree audit, exactly what was predicted) of which 4,550 (68 percent) have either received associate's degrees or are in line to receive them (with 59 of 60 institutions reporting).
- **20,105** potential completers, of which 2,076 have either returned to school or have indicated intent to return (from only 42 institutions, but a much lower number than public mythology would expect).
- **14,872** who turn out neither to qualify for a degree nor to be in range.

Are these numbers good, bad, or indifferent? We are agnostic on the answers at present, and no doubt some participating institutions will be reviewing their earlier accounting. There is a modest amount of work some will finish on their own and a modest number of cells they might fill in on the project spreadsheet. Then, too, for individual institutions to arrive at a balanced interpretation of what might seem to be a disappointing number

of eligibles, a comparison showing a significant increase in associate's degree awards vis-à-vis a low eligibility rate would imply that the institution is functioning more efficiently in bringing students to completion.

Conversely, if one finds a high number of eligibles and total degree awards that have not measurably increased over the period investigated, the institution should be looking more intensely at its internal monitoring and communications. As the former registrar at Tidewater Community College observed, if schools followed the Win-Win sequence annually or every other year, the burden would be "less overwhelming," and a higher level of degree-award efficiency would result. Win-Win did not engage in this analysis for the 60 participating Win-Win schools. That's something they might do on their own.

Others, representing institutions in states with performance-funding policies, were more skeptical than agnostic. "Where's the money?" some asked. That is, if an institution put as much labor into finding lost degree-qualifiers and coaxing near-completers back to school as Win-Win requires, state funding rewards were expected, if only to compensate for labor costs. If a project like Win-Win produces 1,500 associate's degrees (as did three institutions in Florida) or 555 (six institutions in New York), and it is a one-time event, and there is no monetary reward from the state, the skeptics add, why should we do it?

Win-Win's answer: People, not money. One could back off both agnosticism and skepticism, and note that 64.3 percent of the cases that made it through degree audit were either eligible or potential degree recipients.¹⁸ This figure validates Win-Win's driving assumption that there were a substantial number of empty-handed students out there who are worth a second look. That proportion should encourage other institutions and systems to engage in similar efforts. From another angle, Win-Win found 27,000 students (eligibles plus potentials) who had no idea how close they were to finishing a degree, let alone actually qualifying for one. If the students didn't know, as one Win-Win institutional manager remarked, that meant someone wasn't telling them.

¹⁸ More arithmetic: 6,733 eligibles plus 20,105 potentials=26,838. Divide 26,838 by the 41,710 for whom judgments were leveled in the degree audit process, and you get 64.3 percent.

All the more reason to execute regular degree audits, to maintain accurate contact information, and to reach out regularly, especially if continually redeployed military populations are at issue. In Win-Win's universe, that meant not only Columbia College in Missouri, but also most of the participating community colleges in Virginia.

The narrative has also produced dozens of advice and qualification flags along the way, all of them attached to specific steps of the core Win-Win process, and all offering guidance for similar future efforts. What else can we conclude?

- People have to work awfully hard to get to this point, bit by bit, ounce by ounce—(yes, I know I'm repeating Stephen Sondheim lyrics, but "Putting it Together" perfectly describes the Win-Win story). If everything in the data, tracking, and communications with students processes were fixed, the tasks would be much easier.
- Win-Win had to overcome a lot of personnel turnover, both at the state and institutional levels. Just about everyone who stepped into the gaps came up to speed reasonably quickly. Whether this happens in other data-oriented student tracking and degree-completion projects no one knows.
- The Win-Win process has demonstrated what academic integrity in certifying students eligible for degrees means: Nobody passed out empty pieces of paper; nobody was indiscriminate.
- Win-Win is about numbers, not about content. It is not about what students learn: For that task ever-increasing numbers of institutions are turning to the *Degree Qualifications Profile* and/or for what students learn in their major fields of study, to the ever-expanding process known as "tuning." Those are other story lines, not this one. When one of Win-Win's state coordinators asked whether eligible students were any smarter for our efforts, the answer was a clear "I doubt it!"
- We cannot micromanage student behavior or sacrifice academic standards to shape outcomes that make institutions look better, but we can smooth out and, in some cases, wipe out procedures and rules that are artificial barriers to student completion. Yes, the institution might look a little better; but Win-Win is ultimately about students.

Will efforts like Win-Win measurably increase the proportion of the young adult population (25–34 years old) with degrees, as policymakers and pundits urge? No, and for a reason that should recall your fourth-grade math. Unlike most other advanced post-industrial democracies, the United States has a population denominator that has been rising. That denominator (the number of 25–34 year-olds) was large to start with and will get even bigger over the next 20 years, then begin to decline as current fertility rates have fallen below the replacement line.¹⁹ What happens to fractions—hence percentages—when the denominators grow faster than the numerators (and the relatively slow change in numerators marking human behaviors such as college attendance and completion is something every demographer in town knows well)? That's a no-brainer. Enough said!

Bigger than Win-Win are the challenges of cultural change in attitudes toward associate's degrees. In institutions that offer both the associate's and bachelor's degrees, the former is often regarded as a "drive-by" credential, hence not seen in a golden light. And the current fad of certificate worship in higher education shifts value from the degree to something less.

Win-Win has a different message for students. First, there is nothing wrong with completing intermediary credentials. Secondly, completion of the intermediary is far better than walking around empty-handed. Finally, certificates are far less broadly understood than degrees in both labor markets and in the society writ large. Internationally, certificates are not counted as higher education; associate's degrees are, whether in the United States, Japan, Korea, France, England, Ireland, Denmark, the Netherlands, or other countries where they are offered under different names but with similar criteria.

¹⁹ See Adelman, C. 2009. *The Spaces Between Numbers: Getting International Data on Higher Education Straight*, Table 5, p. 23.

Win-Win posits a challenge to the larger higher education community: If the universe of schools that awards associate's degrees followed the Win-Win sequence, it would find 64 percent of the students emerging from degree audit should have been subjects of continuous monitoring and contact a long time ago. To be sure, the 64 percent is an average. For some institutions, a higher percentage would emerge; for others, a lower proportion.

Higher or lower, do we sincerely want to find these former students, one-by-one, ounce-by-ounce, give the eligibles their due, and do our best to bring the potential completers to completion?

In the opinion of Win-Win participants, agnosticism doesn't have a chance in the face of that volume. ☒

If We Had to Do It All Over Again, What Would We Change?

The ideas that follow should add grist to the planning mills of systems and institutions contemplating projects analogous to Win-Win. In the same spirit of candor exhibited by Win-Win participants, we offer several admissions and guidances:

- **Set parameters for the initial data mining.** We urge a minimum of 18 months, working backwards from the project start date, during which the student was not enrolled at the school. Many of our Win-Win schools used 12 months, and we did not object. But an 18-month gap is more likely than a 12-month gap to indicate a true school dropout (though not necessarily higher education dropout, which is something determined in the matching process).
- **Use a higher threshold GPA than the Win-Win 2.0.** We acknowledge the point of institutions that used 2.5: To avoid dealing with marginally qualified students, they insisted on a higher level of performance. Besides, a higher threshold—which need not automatically mean a 2.5—would cut down on the degree audit load. Setting a marker, though, would require running a distribution of all GPAs above 2.0 for a tentative universe of interest, then agreeing on a statistical decision rule to reshape the tentative with a firm, final GPA threshold.
- **Consider the GPA in the student's major.** GPA in major (yes, community colleges have majors!) proved to be a critical miss in our parameter statements for the initial universe of interest because, in the course of degree audit, students with below-acceptable performance in the major will be classified as either potential or flat-out ineligible for anything. It's a fruitless task to ask potential completers with low GPAs in their majors to return to school for the sake of more credits with better grades. Some Win-Win participants suggested excluding from the universe of interest students with low GPAs in their majors up-front.
- **Audition the data mining.** Any future Win-Win effort should require a pre-participation data test of any would-be Win-Win school. If the school cannot produce a universe from its existing student level data in two or three days (including transfer-in data with clear decision rules), it would be barred from further involvement. The algorithms are easy, but if the data elements are not present, the school might stumble along for months, and the longer the initial take drags out, the more project momentum declines in sync.
- **Reduce the project length from 24 months to 18 months.** The shorter the period, the less likely the results will be contaminated by people returning to school, who then should not have been in the universe of interest to begin with. The two most time-consuming phases in the Win-Win sequence are auditing degrees and then locating, contacting, and negotiating with potential completers. One sees immediately why we advocate a pre-participation test: It shortens the process by two to three months. We would also shorten the time span by skipping matches with state data, and their contentious results, and going directly to NSC. That, in the experience of current Win-Win institutions, would cut another two months from the schedule.
- **Set clear rules on local set asides.** For the matching process, designed to eliminate currently enrolled students and previous degrees, we would require all participating institutions to provide specific sources or decision rules for any student who is set aside during this process. Win-Win saw more than 6,000 students in 11 institutions dropped with no indication of source or rationale, and that is simply unacceptable.
- **Survey students about their experience.** Win-Win did not ask participating institutions to survey various student populations, for example, asking those who refused to accept offered

associate's degrees why they refused (assuming, of course, these students could be located in the first place), or asking contacted potential completers who declined to reenter school why they did not wish to complete. It would be helpful to know, for example, the proportion of refuseniks who were under the erroneous impression that accepting an associate's degree would cut off all future financial aid. It would also be more than relevant to our assessment of college completion to know the proportion of students put through degree audit who regarded a degree as irrelevant to their education. Surveys would have added a considerable amount to the budgets for Win-Win projects, and project designers, the author included, chose breadth over depth of coverage. Future efforts analogous to Win-Win might behave differently.

- *Follow student mobility within the project.* Win-Win did not establish a separate data grid to account for students from the original universe of interest or the degree audit population who reenrolled (and even earned degrees) during the two-year period in which an institution was working through its Win-Win sequence. And we did not ask participating institutions to keep records of students entering the Win-Win universe after its initial cut. They all had enough troubles shaping the data extant after Win-Win parameters were drawn.
- *Document residency and recency policies.* Win-Win did not survey participating institutions to determine who trumps who (the state system versus the regional accrediting authority) in terms of residency or recency requirements for degrees.
- *Track level of effort.* We did not ask institutions to record the number of staff hours spent on Win-Win activities, which would have provided a better sense of costs and benefits. Answers to both these questions would provide a richer tapestry.

- *Improve project data collection.* With 60 institutions and 40 variables (not all of them pursued vigorously) in the Win-Win sequence, we would have been better served with a URL in which institutions entered and revised their own data and information such as methods of locating students, software products used in degree audits, and degree award policies. Instead, participants passed on their information in a variety of communications for inclusion so that it ultimately wound up (and sometimes inaccurately) in a master spreadsheet at IHEP. Some of the errors and bad translations along the way have been the project director's fault.

What we can say of Win-Win at its finish line is that it has been an extraordinary learning venture for all of U.S. higher education. It took the hands and efforts of people who went beyond their calls of duty, persistently and over long periods of time. The project has produced some degrees; it has brought some former students back to school to complete. Far more importantly, it has taught everyone what lies on the road to quality data, quality accounting, and service to students: A lot of work in the trenches, because the road turns out to have more turns, craters, and washouts than previously imagined. Win-Win people have borne witness to both those challenges and the joys of students when the challenges were overcome. Stephen Sondheim's lyrics say it too well: Putting it together—bit by bit, ounce by ounce—hasn't been easy. The people behind Project Win-Win, up and down the line, deserve considerable plaudits. ㄟ

Appendix A

Institutions Participating in Project Win-Win and Their Characteristics

State	Institutions	2011-12 Enrollment (Rounded to 100)	2011-12 Associate's Degrees Awarded	Win-Win Years
OR (17)	Blue Mountain Community College	2,700	301	2011-13
	Central Oregon Community College	7,100	652	2011-13
	Columbia Gorge Community College	1,200	188	2011-13
	Chemeketa Community College	12,600	1,284	2011-13
	Clackamas Community College	7,900	712	2011-13
	Clatsop Community College	1,300	101	2011-13
	Klamath Community College	1,400	138	2011-13
	Lane Community College	12,800	1,201	2011-13
	Linn-Benton Community College	6,300	656	2011-13
	Mt. Hood Community College	9,900	1,060	2011-13
	Oregon Coast Community College	500	48	2011-13
	Portland Community College	34,600	3,232	2011-13
	Rogue Community College	5,800	525	2011-13
	Southwestern Oregon Community College	2,100	274	2011-13
	Tillamook Bay Community College	500	25	2011-13
	Treasure Valley Community College	2,600	344	2011-13
	Umpqua Community College	3,100	414	2011-13
MI (9)	Bay de Noc Community College (Bay College)	2,700	422	2011-13
	Henry Ford Community College	17,700	1,498	2011-13
	Lake Michigan College	4,700	455	2011-13
	Mott Community College	11,800	1,736	2011-13
	North Central Michigan College	3,000	308	2011-13
	Northwestern Michigan College	5,200	731	2011-13
	Oakland Community College	29,200	2,415	2011-13
	Southwestern Community College	3,000	359	2011-13
	St. Clair County Community College	4,600	553	2011-13
LA (7)	Bossier Parish Community College	7,100	630	2009-11
	Delgado Community College	20,400	1,253	2009-11
	McNeese State University *	8,800	119	2009-11
	Northwestern State University of Louisiana *	9,200	869	2009-11
	Nunez Community College	2,400	160	2010-12
	Southeastern Louisiana University *	15,400	62	2009-11
	South Louisiana Community College	3,900	284	2011-13
NY (6)	Alfred State University * (State University of New York College of Technology)	3,600	826	2011-13
	State University of New York College of Agriculture and Technology at Cobleskill *	2,500	342	2011-13
	Clinton Community College	2,300	323	2010-12
	Monroe Community College	17,700	2,703	2009-12
	Orange County Community College	7,300	761	2010-12
	Suffolk County Community College	26,800	3,438	2009-12

State	Institutions	2011-12 Enrollment (Rounded to 100)	2011-12 Associate's Degrees Awarded	Win-Win Years
VA (6)	Germanna Community College	7,800	656	2011-13
	New River Community College	5,200	482	2011-13
	Northern Virginia Community College	50,000	5,452	2011-13
	Thomas Nelson Community College	11,000	879	2011-13
	Tidewater Community College	32,100	2,923	2010-12
	Virginia Western Community College	8,600	670	2010-12
OH (5)	Clark State Community College	4,900	446	2009-11
	Kent State University regional campuses-Stark, Trumbull, and Tuscarawas	10,800	555	2010-12
	Lakeland Community College	9,500	926	2009-11
	Northwest State Community College	3,600	360	2011-13
	Rhodes State College	4,100	616	2011-13
MO (4)	Columbia College *	18,100	1,520	2010-12
	DeVry University, Kansas City *	1,400	71	2011-13
	Metropolitan Community College (district)	5,200	1,889	2011-13
	St. Louis Community College (district)	29,200	2,113	2010-12
WI (4)	University of Wisconsin Colleges (13)	14,400	1,751	2010-13
	University of Wisconsin-Green Bay *	6,700	20	2010-12
	University of Wisconsin-Platteville *	8,300	4	2010-12
	University of Wisconsin-Stevens Point *	9,500	167	2010-12
FL (3)	Broward College	42,200	6,218	2011-13
	Indian River State College	17,500	2,691	2011-13
	St. Johns River State College	6,200	882	2011-13
	TOTALS	628,000	62,693	

Source: U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS)

*Historically bachelor's degree-awarding institutions that also award associate's degrees.

Appendix B

Distribution of Project Win-Win Institutions by Enrollment and Number of Associate's Degrees Awarded

2011-12 Enrollment:

	2-Year Colleges	Historically Four-Year Colleges
More than 20,000	8	0
15-20,000	3	2
10-14,999	6	0
5-9,999	14	5
2-4,999	15	2
Less than 2,000	5	1
Total 2011-12 Enrollment	544,500	82,500
Total 2011-12 Associate's Degrees Awarded	59,035	3,658

Appendix C

Data Reported in Project Win-Win

Variable	Rating	# of Institutions Affected	# of Institutions Reporting	Comments
Step 1: Reporting Students in the Universe of Interest	Critical	61	61	
% Who were Transfers-In	Important	60	59	1 couldn't do it
Ave. Credits Transferred-In	Important	60	59	1 couldn't do it
Step 2: Reporting Students Earning Degrees, Reenrolling Elsewhere or Other Exclusions	Critical	60	60	
Matched with State Data	Critical	35	35	Others did not use state
Matched with NSC Data	Critical	54	54	28 also matched with state
Of NSC Matches, % in 4-Year	Important	54	43	3 with unreliable data
Available for Degree Audit	Critical	60	60	
Step 3: Reporting Students Sent To Degree Audit	Critical	60	60	
% Who Were Transfers-In	Nice to know	60	47	Wasn't mandatory
% Who Attended > 2 Schools	Nice to know	60	32	Wasn't mandatory
Reporting "Eligibles"	Critical	60	60	1 had no eligibles
Ave. # Credits Earned	Critical	59	52	
Could Not Locate	Important	59	57	
Awarded Degrees	Critical	59	56	
Demographics	Important	59	57	
Reporting "Potentials"	Critical	60	60	1 had no potentials
Missing Math	Critical	59	55	
Missing English	Nice to know	59	42	Wasn't mandatory
Could Not Locate	Important	59	48	Not finished yet
Returning to School	Important	43	31	Not finished yet
Reporting "Neithers"	Critical	60	60	1 had no neithers
Other				
Methods of Degree Audit	Important	61	59	
Methods of Locating	Important	61	60	
Degree Award Policy	Critical	61	61	

Appendix D

Sample State/Institution Project Win-Win Data Sharing Agreement

THIS AGREEMENT is entered into between and among SUNY System Administration, located at SUNY Plaza, Albany, New York 12246 (System); _____, a community college operating under the program of the State University of New York and located at _____ (College 1); and _____, a state-operated institution within the State University of New York and located at _____ (College 2) for the purpose of creating a data sharing arrangement between and among the parties which complies with the Family Educational Rights and Privacy Act (FERPA) and its implementing regulations.

The data shared between the Colleges is in furtherance of an evaluation of the effectiveness of the State-supported educational programs at each institution and in SUNY generally within the framework of Project Win-Win as funded by the Lumina Foundation.

1. The personally identifiable student information (PII) shared hereunder will be used exclusively for the purposes of Project Win-Win (the Project) to enable each institution to determine whether identified students have met applicable degree requirements.
2. System designates Colleges 1 and 2 as its authorized representative for purposes of implementing the Project. Each party shall identify in Appendix A their staff members who will have exclusive access to the PII shared hereunder.
3. The PII to be shared under this Agreement consists of official student transcripts (add other information if necessary). College 2 will provide such transcripts to College 1 based on the following criteria: (describe how students will be identified).
4. College 1 will destroy such official student transcripts when the information is no longer needed for the purposes described hereunder but no later than _____. This time period may be extended by mutual agreement of the parties if necessary for the purposes of the Project. Destruction of such records shall be by shredding or comparable method.
5. The Parties agree to preserve the confidentiality of all personally identifiable information about individual students obtained pursuant to this Agreement. Consistent with FERPA, SUNY policy and NYS Personal Privacy Protection Law, PII from education records exchanged hereunder will be used exclusively for the purposes of the evaluation being conducted under the Project and shall not be re-disclosed to any individual or entity not listed in Appendix A. However, the recipient of PII may re-disclose it back to the providing party. Each party will establish procedures and protocols for the security of the PII which procedures shall be subject to review and audit by System. Such procedures shall include (encryption of computer data, procedures to limit access to PII by unauthorized persons, storage of PII in locked facilities, employee training on FERPA requirements, etc.) Each party shall ensure that its employees listed in Appendix A are aware of the prohibition against re-disclosure and of the potential for disciplinary sanctions for violation of FERPA and this Agreement.
6. In the event of a material breach of the confidentiality obligations of this Agreement, System may terminate the Agreement as to the breaching party upon 30 days notice to the breaching party, provided that the breaching party has been given notice of the breach in writing and has failed to cure the breach satisfactorily within 30 days. Upon termination for cause, the breaching party shall immediately cease the use of all data received from the other parties pursuant to this Agreement and shall immediately destroy such data.
7. New York Information Breach and Notification Requirements. The Colleges hereby acknowledge and agree to use reasonable efforts to maintain the security of private information (as

defined in the New York State Information Security Breach and Notification Act, as amended “ISBNA” (General Business Law § 889-aa; State Technology Law § 208) that it creates, receives, maintains or transmits on behalf of SUNY and to prevent unauthorized use and/or disclosure of that private information; and implement administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity and availability of electronic private information that it creates, receives, maintains or transmits on behalf of SUNY (“SUNY Data”). The Colleges hereby acknowledge and agree to fully disclose to SUNY pursuant to the ISBNA, and any other applicable law any breach of the security of a system where the Contractor creates, receives, maintains or transmits private information on behalf of SUNY following discovery or notification of the breach in the system as to any resident of New York State whose private information was, or is reasonably believed to have been acquired by a person without valid authorization (“Security Incidents”). The disclosure shall be made in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement or any measures necessary to determine the scope of the breach and restore the reasonable integrity of the system. The Colleges shall be liable for the costs associated with such breach if caused by the their negligent or willful acts or omissions, or the negligent or willful acts or omissions of the College’s agents, officers, employees or subcontractors. In the event of a Security Incident involving SUNY Data pursuant to the ISBNA, SUNY has an obligation to notify every individual whose private information has been or may have been compromised. In such an instance, the Colleges agree that SUNY will determine the manner in which such notification will be provided to the individuals involved pursuant to the ISBNA and agrees to indemnify SUNY against any cost of providing any such legally required notice. Upon termination or expiration of this Agreement, the College’s will follow SUNY’s instructions relating to any SUNY Data remaining

in the Contractor’s possession. Upon authorization from SUNY, the Contractor will use data and document disposal practices that are reasonable and appropriate to prevent unauthorized access to or use of SUNY Data and will render the information so that it cannot be read or reconstructed.

8. The parties will ensure that the results of the evaluation undertaken for the Project shall not be published in a way that will allow individual students to be identified.
9. The Parties designate as points of contact for this Project the following persons:
 - System:** Dr. Robert Kraushaar, Associate Provost, SUNY System Administration, One University Plaza, Albany, NY 12246, (518) 320-1670, Robert.Kraushaar@SUNY.edu
 - College 1:** name, title, address, phone, e-mail
 - College 2:** name, title, address, phone, e-mail
- All notices and requests for information, its format, method of delivery, extensions of time, etc., shall be sent by electronic mail or regular mail to the Party’s point of contact.
10. This Agreement may only be amended in writing signed by the Parties.
11. The Agreement may be executed in separate originals, which together shall comprise one single fully executed document.



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May 20, 2014

Carol A. Griffiths
Executive Director
NACIQI and MCFMEA
U.S. Department of Education
Washington, DC 20202

Re: For NACIQI discussions on June 18-19

Dear Ms. Griffiths,

In response to the invitation from Susan Phillips which you shared on April 3, 2014, the enclosed potential contribution to the discussions and deliberations of NACIQI on June 18-19 is focused on the issue of student learning outcomes criteria as stated (or not stated) in 47 sets of standards for accreditation of undergraduate degrees and programs as posted by 37 recognized accrediting bodies—regional, national, and specialized.

The empirical analysis in the attached document shows that only 18 of those 47 documents made any attempt to deal directly with student learning outcome standards, and the question I put on NACIQI's plate is whether NACIQI can insist that the Department of Education bring that ratio to 47 of 47. An allied issue addressed in the paper explores problems in the language of student learning outcome statements as that language appears in these documents, something I do not believe NACIQI can or should comment, but which its discussion might send clear signals for improvement.

As was the case in my first and earlier (April 25) submission for NACIQI consideration of a different set of challenges, I hope you will consider these issues in your upcoming discussions, and would be pleased to elaborate and answer questions should you so request.

Sincerely,



Clifford Adelman
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**Avoiding the Issue:
the Extent, Means, and Language of Student Learning Outcome Criteria
in Accreditation Standards**

Clifford Adelman, Senior Associate
Institute for Higher Education Policy

I. Background and Purpose

The purpose of this brief paper is to stimulate NACIQI to be more proactive in demanding that accrediting bodies require direct, explicit, and concrete student learning outcome statements from both member institutions of higher education and specialized programs within those institutions that face regular review. The evidence presented below shows a jumble of current treatments of student learning outcomes in standards statements, ranging from no utterances concerning student learning to a variety of unconvincing proxies to fairly sophisticated and combinations of requirements. On the whole, it is a surprisingly weaker collection than one would expect.

The author recognizes that it is not within NACIQI's charge or purvey to require that accrediting bodies employ specific language in student learning outcome standards to be applied to the institutions and programs subject to accreditation. Nonetheless, this brief essay devotes some space to a selected set of problems in the language of existing statements of those accrediting organizations. If nothing else, reflection on that language might stimulate reform.

The author is one of four of *The Degree Qualifications Profile* (Adelman, Ewell, Gaston, and Schneider, 2011 and 2014), and the sole voice of "Use and Problems in the Language of Discipline-Based Qualification Statements" (*The Tuning Journal*, in press, 2014). The former is an ever-evolving statement of the proficiencies students should demonstrate in qualifying for three levels of degrees (associate's, bachelor's, and master's), sets forth very strict language rules for the expression of these proficiencies, and has involved three major regional accreditors (HLC, SACS, and WASC) in projects exploring its potential in a variety of settings. The latter is an empirical account and analysis of English language use across three continents in 40 Tuning (Europe and the US), benchmarking (United Kingdom), and discipline profile (Australia) statements of desired demonstrated competencies and learning outcomes in specific disciplines, principally at the bachelor's level. It was the fine reading and natural language processing (Levin, 1993) of those 40 statements that stimulated a parallel (though hardly as elaborate) investigation of accrediting authority standards statements in the United States.

Using the directories of the Council for Higher Education Accreditation, I isolated 47 accrediting guidelines of 37 organizations (6 regional, 4 national, and 27 specialized) that accredited bachelor's and pre-bachelor's credentials. Organizations accrediting only post-baccalaureate credentials were not included in the subject universe. A list of accrediting organizations whose standards statements were parsed is presented as Appendix A.

II. What Did I Look For? What Did I Find?

Obviously, accrediting standards cover a wide range of topics. Though there are no standardized forms for these templates, certain features, e.g. financial stability, faculty qualifications, and review processes, turn up in all of them. My reading zeroed in on any section of a standards statement that might have something to do with student learning: curriculum coverage, learning opportunities, assessment, degree award criteria, and outright student learning outcomes. What we might call the “provision of opportunities”—curriculum coverage, potential of participating in cooperative education, on-line courseware, etc.—is the most frequent of these sections of standards. Provision of opportunity statements are addressed to institutional or program responsibility, and while they may be combined with explicit learning outcome statements (as they are, in an exemplary and very detailed manner, in the standards of the specialized accrediting programs in fine and performing arts—music, theater, dance, art and design), they often stand with no connection to student qualifications. One cannot assume that the provision of opportunities means that students have taken up all the opportunities listed or have learned anything if they have. Provisions of opportunities may be fine guidance for institutions, but, if not linked to their logical extension, are but assumed proxies for student learning.

The most convincing statements of required student learning outcomes, when one finds them, are based in what the *Degree Qualifications Profile* calls “operational” verbs. These have been around in educational discourse since Benjamin Bloom’s original (1956) *Taxonomy of Educational Objectives*, though they are too frequently either forgotten or buried. An operational verb is an active prod that logically can extend to an assignment or assessment. Seen from the engine of the verb, a statement of learning outcomes is incomplete without examples of assessments/assignments that would allow the degree of student learning to be judged. For example (from version 2.0 of the *DQP*), in the realm of “specialized knowledge,” the following proficiency at the bachelor’s level is posited: the student

“Addresses a familiar but complex problem in the field of study by *assembling, arranging* and *reformulating* ideas, concepts, designs and techniques.” [italics mine]

from which the following illustrative assignment springs:

“Prepare an exhibit of not more than five discrete 2-dimensional pieces illustrating the range of chaos in color, drawing on at least two of the major color theory sources, e.g. Goethe, Kandinsky, Chevrueil, in a 3-5 page catalogue of your exhibit, and include in the catalogue a section discussing the ways chemical and digital technologies have changed both the palette and range of color chaos. You are not required to present in the same 2-dimensional medium across all five pieces. The class exhibits will be displayed from April 1 - 30. It is now January 15.” (*Degree Qualifications Profile* 2.0, Appendix C).

To the core verbs, “assemble,” “arrange,” and “reformulate,” one could add “create,” “analyze,” and “illustrate,” and would have virtually all of the active verbs that drive that assignment and others like it in fields other than studio art. Those verbs tell students what they will actually do to demonstrate their learning. Those verbs are what one looks for in accreditation standards, though no accreditation standard should provide examples of either assignments or assessments (those are local matters).

What, specifically, did I read in these documents, and how many cases of each did I find? For each review, the dominant form in which student learning outcomes were/were not rendered was as follows:

A. Specific learning outcomes, with operational verbs articulated, as in the above sample from the *Degree Qualifications Profile*.

11 cases

B. Specific learning outcomes, but with nouns replacing verbs, hence not operational statements

3 cases

C. Generalized learning outcomes or specific outcomes but with non-operational verbs

4 cases

D. Completion of curricular segments as proxies for learning outcomes

9 cases

E. Student academic standing (credits, GPA, level) as proxies for learning outcomes

5 cases

F. Assessment plans or processes as proxies for learning outcomes, and under the assumption that the required assessment process addresses whatever proficiencies are specified by state, professional, or occupational association authorities. If specified at all, these proficiencies are presented in generalized terms.

3 cases

G. Student post-degree behavior as proxies for completions, hence unspecified learning outcomes

1 case

H. No student learning outcome standards

11 cases

All proxies are just that: they are not statements of student learning outcomes in accreditation standards. They conveniently by-pass the task of expressing, clearly, to both students and the general public, precisely what actions are required to demonstrate that students qualify for the degrees awarded by the institution.

Seen in this light, only 18 out of 47 accreditation association documents (cases A to C above) even make an attempt to deal with student learning outcomes. Seen in this light, I am obviously urging NACIQI to convince the U.S. Department of Education to raise that proportion to 47 of 47.

III. Verbs as Drivers of Student Learning Outcomes: Examples and Explanations

Within the 47 accreditation standards sections examined, the following verbs were used in the context of student learning outcomes. I have separated them into two simple groups: operational (II.A above) and non-operational (II.C above):

A. Operational verbs (Type A)

Acquire
analyze
apply
articulate
assess
code
collaborate
collect
combine
compare
coordinate
create
critique
defend
define
describe
design
display
distinguish
exhibit
explore
evaluate
explain

B. Non-operational or generalized (Type C)

adhere
administer
appreciate
assist
be aware
communicate
conceive
comply
critique
develop
determine
discuss
educate
experience
follow
gain
grow
intervene
know
monitor
participate
practice
prepare

formulate	promote
hypothesize	process
identify	provide
interpret	recognize
integrate	reflect
justify	respect
label	respond
locate	teach
maintain	understand
manage	
modify	
negotiate	
obtain	
organize	
perform	
present	
select	
solve	
synthesize	
use	
utilize	

My judgments in the bi-modal sorting of verbs actually used in the accreditation standards statements investigated are based on (a) over 200 categories Levin induced from a massive analysis of 3,024 verbs in ordinary language use (Levin, 1993) and (b) 17 groupings I distinguished in isolating 127 working verbs used in 1291 learning outcome statements contained in the 40 discipline-oriented Tuning, benchmarking, and profile templates in the study cited in Section I above (Adelman, in press). To be sure, there are no perfect matches here; there are obviously more than two groupings; and the categorization of each word could be open to contention (an exercise in which we could engage here, though to considerable diversion). That said, the kind of reflection on the wording of learning outcome standards NACIQI might advocate should be stimulated by a close reading of the verbs listed under Type C accreditation organization guidelines.

IV. Major Issues Involving Type C Verbs

First, the heavyweight “understand” and “know,” both of which even Benjamin Bloom and colleagues dismissed from and crippled within the universe of active verbs 50 years ago, but continue to be used as defaults. In the *Taxonomy of Educational Objectives*, “knowledge” describes simple recall, and “understanding” is excluded as “a single (unanalyzed) term” (Bloom et al, 1982, p. 15). “Knowledge” and “understanding,” often used as synonyms in these documents, often appear with an introductory adjective indicating a general type of knowledge or understanding, e.g. broad, specialized, advanced, integrative, comprehensive, theoretical, practical. Again, it is assumed that everyone knows on their pulses what the resulting phrases, e.g. “advanced understanding,” mean. But these are opaque labels. One is tempted to ask, “So,

what might 'not so advanced' mean?" Ellipsis has no place in competence and learning outcome statements, but, unfortunately, ellipsis is too common in such utterances.

Furthermore, properly speaking, and in English, "understanding" is not a synonym for "knowledge," however much the two are related. "Understanding" is a cognitive process, one that brings into play enough operations (in addition to those specified in the Bloom *et al* taxonomy's division between knowledge and comprehension) such as description, inference, testing, and visualization so as to add depth to the individual's "knowledge" of facts, relationships, formulas, etc.

If nothing else will suffice, the ideal form of a knowledge competence/learning outcome would read, "The student acquires and demonstrates knowledge of X, Q, and M," whether X, Q, and M are facts, ideas and theories, terminology, methods, processes, genres—or some combination of these. Otherwise, as Bloom and his colleagues pointed out, "knowledge" invokes simple remembering and recall, acts that are assumed in virtually all other cognitive dynamics, and, for students already enrolled in associate's or bachelor's degree programs, hardly a stand-alone performance criterion that qualifies one for a degree.

The **second** issue involving Type C verbs lives in another default verb, "communicate." The economist Fritz Machlup wrote long before digital technology, its devices, and apps opened up a universe of communication lines in five or six dimensions. Yet, as he pointed out, the difference between ordinary yapping and "communication" lies in "talking [and writing, and texting, and e-mailing and blogging] *for a purpose*" [italics mine], and for which every language presents a range of verbal options. In English, to pick a sample of Machlup's sample: "reporting. . . warning. . . requesting. . . advising, persuading, directing. . . convincing, permitting, teaching. . . edifying, confirming, affirming, denying, misleading. . ." (Machlup, 1962, p. 31) are all purposes. The point is not to use all of these in learning outcome statements, rather, instead of a blank "communication," tell us what kind and for what purpose. And, as Machlup suggests, think about what role the student is playing as the originator of communication: "transporter. . . transformer. . . processor. . . interpreter. . . analyzer. . . original creator" (Machlup, 1962, pp. 32-33) to which we would add in our time to follow the bazaar model of knowledge creation we see (for the most obvious example, in Wikipedia), "contributor. . . editor. . ." Then put the noun in verbal form, e.g. "disseminate," "debate," "respond," "negotiate," and many other forms of verbal interaction, and we will have given shape to an otherwise vague command. In Levin's Natural Language Processing taxonomy (Levin, 1993) in the context of higher education, these are verbs of "transfer," not verbs of different purposes or behaviors such as complaints or advising.

The **third** issue involves non-operational verbs. The problems attendant on these verbs can be grouped in five sets. None of them are learning outcomes. None of them lead logically and inevitably to assessment prompts.

1) verbs that describe routine student activities in education: conceive, develop, experience, participate, practice, process, reflect

2) verbs used in the course of assignments or instructions given by faculty, and/or serve as behavioral commands: adhere, comply, determine, discuss, follow, intervene, monitor, prepare, promote, provide, respond

3) verbs that refer to states of generalized consciousness, not actions that demonstrate competence in anything: appreciate, be aware, recognize

4) verbs that lead to outcomes observable principally in future actions of the student: administer, educate, teach

5) verbs expressing general behaviors or changes that are not transparently connected to any cognitive action: assist, gain, grow, respect

One could add a dangerous default noun to this list: “ability,” its verb form in “able to,” and its principal analogue, “capacity.” German comes closer to the problem with the word in English: *die Fähigkeit* means “aptitude.” At least in U.S. education discourse, “aptitude” is what we would call a “red flag” word. It labels something that is putatively *inherent* in an individual, and its equivalent in discourse is “ability.” However ensconced “ability” is in the literature on competence, we would do well to remember that “quantifying differences in individual mental ability” led to IQ testing and its consequent strengthening of “pervasive forms of discrimination” (Carson, 2001, p. 34 and p. 41). Its history carries too much of this unwanted baggage.

But there are other reasons for avoiding the term. “Ability” is not something an individual *does*. One doesn’t know a student has an “ability” to do anything, or a “capacity” for anything until the student *actually does it*, and the learning outcome is reflected in what the student does. As Richard Shavelson notes, a competence is impossible to infer without an “observable performance” (Shavelson, 2013, p. 29), and one does not get an observable performance from “ability.” We do not judge the unseen. That is, one cannot assess an “ability,” whereas one can write prompts that extend the description of a learning outcome demanding that a student “identify,” “categorize,” “differentiate,” “design,” “disaggregate,” “reformulate,” “evaluate,” etc. Of course it is possible to regard “ability” clauses as “white noise.” I would be remiss, however, if I did not prod NACIQI to raise the issue of how much white noise one should tolerate in learning outcome standards. Raising the issue just might raise consciousness as well, and encourage all accrediting associations to revisit the ways in which they write those standards statements.

V. Conclusion

The observations on the white noise of “ability” bring us back to the purposes of this paper. NACIQI cannot rule specific language, but (a) it can demand universal inclusions of substantive student learning outcome standards, and (b) simply by discussing the language of outcome statements in an open forum, stimulate accrediting organizations to pay more attention to their words and to avoid hollow boilerplate. Both would be significant accomplishments.

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Appendix A:

Accrediting Bodies Whose Standards Statements Were Examined for This Account

A. Regional Accreditors

New England Association of Schools and Colleges Commission on Institutions
of Higher Education
Middle States Commission on Higher Education
Southern Association of Colleges and Schools Commission on Colleges
Higher Learning Commission of the North Central Association
Western Senior College and University Commission
Northwestern Association of Colleges

B. National Accreditors

Accrediting Council of Independent Colleges and Schools
Association for Biblical Higher Education
Association of Theological Schools
Transnational Association of Christian Colleges and Schools

C. Specialized Accreditors

Accrediting Bureau of Health Education Schools
Accrediting Commission of the Distance Education and Training Council
The Accrediting Commission of Career Schools and Colleges
Accrediting Council for Education in Nutrition and Dietetics
American Board of Funeral Service Education
American Assembly of Collegiate Schools of Business (2 fields)
American Chemical Society
Association for Clinical Pastoral Education
Aviation Accrediting Board International
Commission on Accreditation of Allied Health Education Programs (6 fields)
Commission on Accreditation for Health Informatics and Information
Management Education
Commission on Accreditation for Respiratory Care
Commission on Accreditation in Physical Therapy Education
Commission on Massage Therapy Accreditation
Council for Interior Design Accreditation
Council on Accreditation of Parks, Recreation, Tourism and Related Professions
Council on Social Work Education
Joint Review Committee on Educational Programs in Nuclear Medicine
Technology
International Assembly for Collegiate Business Education

Landscape Architectural Accreditation Board
National Accrediting Commission of Career Arts & Sciences
National Accrediting Agency for Clinical Laboratory Sciences (3 fields)
National Association of Schools of Art and Design
National Association of Schools of Dance
National Association of Schools of Music
National Association of Schools of Theater
National Council for the Accreditation of Teacher Education
Planning Accreditation Board
Teacher Education Accreditation Council



PROTECTING STUDENTS AND TAXPAYERS

THE FEDERAL GOVERNMENT'S FAILED
REGULATORY APPROACH AND
STEPS FOR REFORM

HANK BROWN

SEPTEMBER 2013

CENTER ON HIGHER EDUCATION REFORM
AMERICAN ENTERPRISE INSTITUTE

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PROTECTING STUDENTS AND TAXPAYERS

The Federal Government's Failed Regulatory Approach and Steps for Reform

HANK BROWN

When it comes to federal funding of higher education, the government's approach to quality assurance and consumer protection is a public policy and regulatory failure by almost any measure.

For nearly half a century, the federal government has largely outsourced the determination of which colleges and universities are eligible to receive federal taxpayer money—in the form of student grants and loans—to member-based, geographically oriented accrediting agencies. The rationale was to ensure that students attended quality institutions from which they were likely to graduate and be employable, thereby safeguarding students and ensuring taxpayer dollars were well spent. This outsourcing of responsibility, however, has failed to protect consumers and taxpayers.

Accrediting agencies have three primary—and, many say, conflicting—roles. The first is to assist colleges and universities with self-improvement through a process of peer evaluation. Second, since many states and funders will not pay for enrollment at nonaccredited institutions, and most colleges and universities will not transfer course credits earned at nonaccredited schools, accrediting agencies ostensibly protect consumers from “diploma mills.” Finally,

accrediting agencies serve as gatekeepers for the US Department of Education in determining eligibility for federal education funding.¹ This third role is especially important: since federal funding is the lifeblood of most higher education institutions, accreditation determines whether a school can remain financially viable.

Unfortunately, the current regulatory regime that relies on accrediting agencies

- Fails to accomplish congressional intent (and therefore puts billions of federal tax dollars at risk);
- Interferes with the autonomy and independence of American higher education; and
- Undermines America's global leadership in higher education by stifling innovation.

These flaws are not new. For more than three decades, there has been a steady stream of studies on the limits and defects of accreditation.² It is time to acknowledge that further studies of the problem are unnecessary and that Congress must reform and

modernize the process for determining college and university eligibility for federal funds. Drawing on my experience as a US congressman and senator and, later, as president of the University of Northern Colorado and the University of Colorado, I have collaborated with the American Council of Trustees and Alumni (ACTA) and the former chair of the Colorado Commission on Higher Education, Richard O'Donnell, to present a variety of suggestions for reform, ranging from modest tweaks to completely new approaches. These include:

- Separating eligibility for federal education funding from the accreditation process;
- Ensuring transparent performance metrics;
- Allowing for expedited self-certification by colleges, universities, and other education providers;
- Allowing and encouraging new agencies for higher education quality assurance, and giving institutions the opportunity to choose from a range of qualified, approved accrediting agencies;
- Creating institutional-level and student-level accountability for quality assurance; and
- Expanding the number of states designated as accrediting agencies.

I do not argue that all of these steps must be taken to reform accreditation. Rather, reformers should consider each of these ideas as possible components of a larger effort.

A Brief Overview of Accreditation

The first modern accreditors were the New England Association of Schools and the Middle States Association of Colleges.³ They were formed in the late 19th century by those who wished to define what a

bachelor's degree should signify and to facilitate the exchange of best practices among peer institutions.⁴ Soon, other accrediting agencies began developing in the same mold.

In practice, the agencies charged by Congress with determining if a college is eligible to receive federal dollars are funded and staffed by the institutions whose quality they are supposed to ensure, a conflict of interest.

The Veterans' Readjustment Assistance Act of 1952 introduced a major change. It stipulated that students could only use funding provided by the act to attend accredited institutions, meaning the role of accrediting agencies began to expand to include acting as gatekeepers who would determine which institutions qualified to receive federal dollars. This gatekeeper function was augmented by the Higher Education Act of 1965, in which Congress gave the secretary of education the power to determine whether an accrediting agency or association is a "reliable authority as to the quality of education or training offered." Those that were could then deem colleges eligible to receive federal education funding.⁵

Today, six regional agencies form the heart of accreditation in America. They are regional monopolies that control access to federal funding for virtually every type of college and university in their geographic area—from private universities and community colleges to for-profit trade schools and non-profit liberal arts colleges.⁶

These regional accrediting agencies are membership organizations, meaning that the colleges and universities they oversee fund the accrediting body through dues and fees. While the regional accrediting agencies employ professional staffs to coordinate their activities, the bulk of the work is undertaken by hundreds of volunteer faculty and staff from the very institutions being accredited.⁷ In practice, this means

that the agencies charged by Congress with determining if a college is eligible to receive federal dollars are funded and staffed by the institutions whose quality they are supposed to ensure, a conflict of interest this paper will explore.

There are also 52 national accrediting organizations that largely focus on specific types of colleges, such as career and technical, online, or religious.⁸ These national accreditors also serve as gatekeepers for federal funding and, like their regional counterparts, are funded and largely staffed by the institutions they regulate.

A Failure to Accomplish Congressional Intent

Congress thought accreditation would be a good proxy for institutional quality. This assumption was wrong.

Many accredited public and nonprofit colleges and universities across the country fail even basic tests of quality yet remain accredited. The evidence of their failure is writ large in the media, in scholarly studies, and in major federal surveys.

Student Outcomes. In *Academically Adrift: Limited Learning on College Campuses*, researchers Richard Arum of New York University and Josipa Roksa of the University of Virginia found that 45 percent—almost half—of the students at a wide range of accredited four-year colleges and universities showed no growth in such core collegiate skills as writing, analytical reasoning, and critical thinking in their first two years.⁹ Thirty-six percent of students experienced no significant improvement in their mastery of these skills over four years of schooling. Arum and Roksa concluded: “Gains in critical thinking, complex reasoning, and writing skills (i.e., general collegiate skills) are either exceedingly small or empirically non-existent for a large proportion of students.”¹⁰

Other studies corroborate these findings. The National Adult Literacy Survey and the National

Assessment of Adult Literacy conducted by the Department of Education in 1992 and 2003 found that the majority of four-year college graduates could not effectively compare viewpoints in newspaper editorials or calculate the total cost of food items based on their cost per ounce. Moreover, mathematical and verbal literacy rates decreased during this time period among all degree levels—associate’s, bachelor’s, and graduate degrees.¹¹ Course rigor has declined, evidenced by rampant grade inflation. In December 2012, the *Economist* noted that, “A remarkable 43% of all grades at four-year universities are A’s, an increase of 28 percentage points since 1960. Grade point averages rose from about 2.52 in the 1950s to 3.11 in 2006.”¹² And employers consistently report that college graduates lack the skills and knowledge needed for America to compete in the global marketplace.¹³

Contrary to popular belief, quality issues are not limited only to career and technical colleges, for-profit universities, or even undergraduate programs.¹⁴ Perhaps the most troubling evidence that colleges and universities can fail to provide a meaningful education for their students and yet remain accredited are abysmal graduation rates at certain schools. Federal dollars can flow to schools that graduate less than a quarter of their students in six years. Among the most egregious examples are

The University of the District of Columbia	7.7 percent
Louisiana State University–Alexandria	11.1 percent
Texas Southern University	13.3 percent
Chicago State University	13.9 percent
University of Maine Augusta	18.8 percent
Indiana University East	18.1 percent ¹⁵

For over 80 percent of students to enroll (and in most cases, take out federal loans and receive federal grants) and never graduate is scandalous. Yet these and other institutions with similarly unacceptable academic outcomes continue to be accredited.

It took nearly three decades for the Middle States Association of Colleges and Schools accrediting agency to revoke accreditation and turn off the spigot of federal taxpayer dollars to Southeastern University. Granted accreditation by Middle States in 1977, Southeastern's federal student loan default rates had soared to 42 percent by 1987.¹⁶ The university is a clear failure as an academic institution. To say Southeastern's graduation rates were feeble would be an understatement: in 2009, the school's graduation rate was 14 percent.¹⁷

Yet, "because it had ceded most of its regulatory authority to the accreditors," higher education policy analyst Kevin Carey writes,

The federal government could only do so much—as long as Southeastern remained accredited, the government had to keep cutting the checks. And Middle States had little appetite for tough sanctions. Throughout the 1980s and '90s, it periodically put Southeastern on various forms of probation and encouraged it to improve via sternly worded letters. But none of that was publicized to students, who continued to enroll and borrow every year.¹⁸

Middle States finally revoked Southeastern's accreditation in 2009, but not until decades of poor performance had passed, during which time thousands of students, many low-income and disadvantaged, had been ill served.

Student Loan Debt and Default. Low graduation and high dropout rates are especially harmful to the students Congress is trying to use the accreditation process to protect: those who take out student loans. In 2009, 29 percent of students who took out loans dropped out of school (up from 23 percent in 2001).¹⁹ Accrediting agencies fail to enforce standards and good-faith admissions practices, instead allowing colleges to enroll unqualified students with little chance of leaving the institution with anything besides debt.

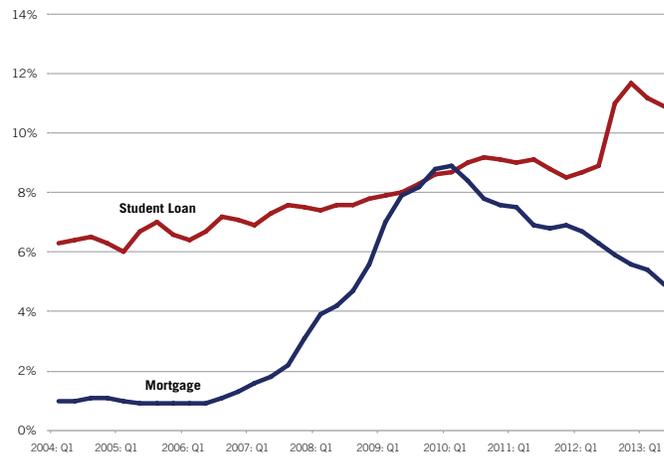
The situation has attracted the attention of national leaders. The Dodd-Frank Wall Street Reform and Consumer Protection Act established a student loan ombudsman within the Consumer Financial Protection Bureau to assist borrowers with private student loan complaints. In his first report, the ombudsman observed:

Outstanding student loan debt is now over \$1 trillion, with private student loans accounting for more than \$150 billion. There are at least \$8 billion of private student loans in default, representing more than 850,000 individual loans. Private student loans are issued by banks and credit unions, state-affiliated and non-profit agencies, schools, and other financial companies.²⁰

And the ombudsman's focus was on only the 15 percent of the trillion-dollar student loan market that is private, not the \$850 billion in federal student loans. The federal government spends over \$185 billion annually in student financial aid through loans and grants.²¹ Yet, students as consumers and taxpayers as funders can rightly ask if they are being protected.

- Among student loan borrowers, 9.1 percent default within two years of graduation.
- While the default rate is highest among for-profit proprietary schools at 12.9 percent, the rate is quite high at public institutions: 8.3 percent. This year, the Department of Education released a three-year default rate, which shows that 13.4 percent of the students attending a public college or university default within three years.²²
- There are over 200 colleges and universities where the three-year default rate on student loans is 30 percent or more.²³ Note that these are all accredited institutions. While 73 percent of these 218 institutions are for-profit, the list also includes both private non-profit and public colleges and universities.²⁴

Figure 1: Percentage of 90-Plus-Day Delinquency in Student Loans versus Mortgages



Source: Adapted from New York Federal Reserve, *Quarterly Report on Household Debt and Credit*, 2013, www.newyorkfed.org/householdcredit/2013-Q2/index.html. NOTE: Data presented on a quarterly basis.

In the mortgage industry, default rates of this type set off alarm bells. During the housing crisis, the Fannie Mae serious delinquency rate (90-plus days or in foreclosure) peaked in February 2010 at 5.59 percent, and it peaked at 4.20 percent for Freddie Mac that same month.²⁵ In November 2012, the Federal Reserve reported that the percentage of student loans 90-plus-days delinquent soared to 11 percent in just one quarter—double the Fannie Mae rate but without the national alarm bells.²⁶

Evidence of limited student learning, grade inflation, low graduation rates, high dropout rates, and high default rates all point to a failure to ensure quality. Instead of ensuring that federal aid only follows students to quality schools, accreditation allows taxpayer money to finance low-quality institutions that fail to educate and often even to graduate their students. In the end, too many students are left with a degree worth little or no degree at all.

Accreditation has given students, parents, and public decision makers little useful information about institutions of higher education. The consumer knows only one thing: the seal of approval has been bestowed. That seal of approval does not

mean a college or university actually meets high standards or provides students with quality learning and training opportunities. Congress's belief for over 40 years that it could rely on membership-based accrediting agencies to evaluate the quality of education and training has proven misguided.

Interference in the Autonomy and Independence of American Higher Education

In most cases, a board of regents, trustees, or directors is the ultimate authority for any of America's roughly 4,000 colleges and universities, whether public, nonprofit, or for-profit.

In some states, the trustees or regents of public universities are constitutional officers elected by the people. In other cases, they are appointed by the governor or legislature.

The same accreditors who seem to have neglected their responsibilities to safeguard academic standards and educational quality increasingly intrude in governance and institutional matters. They use their bully authority and their potential to stop the flow of federal money to tie the hands of America's colleges.

The Western Association of Schools and Colleges (WASC) accrediting agency has repeatedly interfered in the governance of institutions under its watch. WASC decided to second-guess an institution's "Great Books" curriculum and pushed to make it more open.²⁷ When the University of California Regents attempted to investigate and address evidence of runaway administrative costs, they found themselves accused of being "unnecessarily harsh" with administrators.²⁸ As recently as December 2012, these same accreditors were at the University of Hawaii demanding reports on the selection of a new athletic director and administrative decision-making procedures.²⁹

WASC is not alone. An even more egregious instance of interference occurred at the University of Virginia. Although current University of Virginia

policy reserves complete authority to the board in matters of the appointment and oversight of the president, the Southern Association of Colleges and Schools (SACS) placed UVA “on warning,” concluding that the university failed to comply with standards regarding governing processes and had failed to consult the faculty before terminating President Teresa Sullivan in 2012.³⁰ SACS raised no questions about UVA’s academic quality, but instead said that employees should have a say in the hiring and firing of their president, a responsibility that lies with the governing board.³¹

When accreditors are allowed to overrule trustees’ decisions, the result is a reduction in the diversity, flexibility, and independence that has made American higher education great.

With its warning, SACS sought to overrule authority given by the state legislature to the University of Virginia Board of Visitors, who are appointed by the governor to select, evaluate, and, if appropriate, terminate the president. In a complaint filed with the Department of Education against SACS, ACTA argued: “The notion, suggested by SACS, that the board must give the Faculty Senate advance notice of its intention to terminate the president is both ludicrous and in utter violation of the board’s statutory and fiduciary responsibility to serve the public interest. Whether the accreditors like it or not, the authority of the UVA board is plenary.”³²

Further south, SACS twice told Florida governor Rick Scott to limit his involvement in a state university’s affairs. The first warning came when SACS learned the governor publicly suggested Florida A&M University suspend then-president James Ammons a month after the hazing death of a student. SACS’s second warning to Scott came when he weighed in on the selection of a new University of Florida president.³³ It is a misunderstanding of the

roles and responsibilities of a governor for SACS to assert that the chief executive officer of a state does not have the right and duty to express opinions on matters of import to state-owned, operated, and extensively taxpayer-funded universities.

It is important to remember that accreditors are not independent, objective voices. The organizations consist of the very faculty and administrators who benefit from federal dollars and whom the trustees legally oversee.³⁴ As such, accreditors act more like a guild or union, protecting the interests of their members and using the threat of loss of federal funding to supplant those who are, by state constitution, statute, and organizational structure, truly responsible for oversight.

Boards and state officials are effectively being discouraged from their oversight responsibility and from pursuing the innovations their institutions need in deference to accreditor pressure. Such capitulation poses a threat to the very essence of American higher education. When accreditors are allowed to overrule trustees’ decisions, the result is a reduction in the diversity, flexibility, and independence that has made American higher education great.

A Failure to Protect America’s Global Leadership in Higher Education

Congress has historically wanted to minimize federal involvement in higher education, recognizing that lay governance and minimal governmental intrusion have been unique and historic strengths of American higher education. As the *Economist* once wrote: “America’s system of higher education is the best in the world. That is because there is no system.”³⁵

Making accrediting agencies gatekeepers to federal funds while claiming they remain private entities, however, puts form over substance. In their gatekeeping role, accreditors wield immense power as agents of the federal government.

Higher education around the world is undergoing tremendous change—so much so that it has almost

become a cliché to say that it is facing disruptive innovation. Nearly 15 percent of US college students study without ever setting foot in a physical classroom.³⁶ The lecture as the primary means of delivering learning is rapidly being replaced by new teaching methods that blend technology and classroom experiences in ways that improve student outcomes. America's leading universities and faculty are creating massive online open courses in which hundreds of thousands of students enroll in a single course from anywhere in the world.³⁷

Yet, when America's colleges and universities should be focused on improving learning, reducing costs, and innovating, the accreditation process often stands in the way of urgently needed reform.

In fact, many accreditors have even been hostile to innovations like online learning options. Recently, the Higher Learning Commission of the North Central Association of Colleges and Schools suddenly shut down an innovative online program at Tiffin University, citing violations of bureaucratic process rather than serious academic concerns.³⁸

The accreditation process also hinders innovation through the direct and indirect costs it imposes on colleges, diverting financial and human resources away from more productive uses and contributing to the high price that leaves so many students in debt. Stanford University provost John Etchemendy noted that in one year alone (out of at least a four-year process) Stanford's reaccreditation by WASC cost the university \$849,000 in staff time and that "the opportunity cost is incalculable."³⁹

As Shirley Tilghman, former president of Princeton University, observed, there "is no effort to apply anything resembling a cost-benefit approach that would focus the accreditors' attention and limited resources on the institutions that are of greatest concern to the federal government." Rather than focusing on the universities most likely to put students and taxpayer dollars at risk, accrediting agencies force America's top universities to engage in the same onerous documentation and processes as the most egregious diploma mill.⁴⁰

In the end, the modern accreditation regime fails on all fronts. Accreditors flunk their quality assurance function by failing to take note of what is really important for protection of the public's investment in higher education, all the while interfering where they have no special authority or expertise. They are no longer effective at peer counsel, since, as proxies of the federal government, they are also high-stakes regulators. It is the worst of all worlds for students, taxpayers, and universities.

Ideas for a Modern Regulatory Approach

As long as Congress continues to spend taxpayer money to subsidize the cost of a college education via loans and grants, there are four main goals its regulatory approach should achieve:

- Protect students;
- Protect taxpayers;
- Protect university and college independence and autonomy; and
- Allow innovation in the provision of post-secondary learning to retain America's global leadership in higher education.

Below are a number of options—from relative tweaks to more radical reform—that Congress might consider to replace the failed higher education regulatory structure with a modern structure oriented toward consumer protection.

Many of these ideas are likely to find bipartisan support from the House and Senate and also from the Obama administration. In the policy document accompanying his 2013 State of the Union Address, President Obama called on Congress

to consider value, affordability, and student outcomes in making determinations about which colleges and universities receive access to federal student aid, either by incorporating

measures of value and affordability into the existing accreditation system; or by establishing a new, alternative system of accreditation that would provide pathways for higher education models and colleges to receive federal student aid based on performance and results.⁴¹

Especially notable is that the president's last proposal, "establishing a new, alternative system of accreditation," does not refer only to colleges and universities but to "higher education models and colleges." This approach opens the door for students to use federal loans and grants to learn from innovative individual courses and alternative education providers, such as software coding academies and workforce skills boot camps.

Together, the statements of President Obama and Senator Rubio signal a willingness to fix a broken accreditation system and remove barriers to innovation in American higher education.

Barely six months after his State of the Union call for better value and quality measures in higher education, President Obama articulated his vision for "a new ratings system to help students compare the value offered by colleges and encourage colleges to improve." He has announced his intention to "seek legislation allocating financial aid based upon these college ratings." In many ways, President Obama has created a blueprint to dismantle the current, ineffective system of college accreditation and replace it with a metrics-based approach.⁴²

Similar sentiments have been expressed on the other side of the aisle. President Obama's openness to new higher education models was echoed by Senator Marco Rubio (R-FL) in his response to the State of the Union. Senator Rubio argued that "We need student aid that does not discriminate against programs that nontraditional students rely on—like online courses or

degree programs that give you credit for work experience."⁴³

Together, the statements of President Obama and Senator Rubio signal a willingness to fix a broken accreditation system and remove barriers to innovation in American higher education. This paper will now address reforms that would help realize these goals.

1. Separate the quality enhancement role of accreditation from the gatekeeping role that controls access to federal student aid. End the conflicting roles of accrediting agencies and the conflict of interest inherent in its process. Removing control over access to student financial aid from the six regional accreditors would return the accreditation system to its original purpose: improving teaching and learning at peer institutions.

Once they accepted the role as the outsourced agents for the federal government's determination of eligibility for federal tax dollars, accrediting agencies suddenly started answering to two masters. On the one hand, accrediting agencies are owned by their member colleges and universities. This makes perfect sense if the goal is mutual self-improvement. It would be a bit like a group of friends hiring a personal trainer to improve their fitness. The trainer is the expert and may even bark orders, but ultimately there is no question who is in charge and paying the bills.⁴⁴

This voluntary, nongovernmental system of quality assurance and self-improvement was undermined when accreditors took on the dual and conflicting job of being gatekeepers to federal funding. To maintain their good standing as an outsourced agency for the Department of Education, accreditation agencies must do as the federal government wants, even if it conflicts with the mission and needs of their members. It would be a bit like a law saying that to receive food stamps you need to pay a trainer, but the only trainers you can hire must enforce a gluten-free diet whether you need one or not. Tilghman observed that accrediting agencies "are now middlemen, uneasily positioned between an upper and nether

millstone. They must justify themselves to their members on the one hand and the federal government on the other.”⁴⁵

In addition to the problem of serving two masters, accreditation as it currently stands is subject to regulatory capture. Regulatory capture occurs when the regulated are able to influence and control their regulators. Often this occurs through revolving-door hiring practices, lavish entertainment, and invitations to participate in elegant retreats and conferences. Accrediting agencies, however, have accomplished a level of control beyond regulatory capture. In their case, the regulated are also the regulators. As noted in the alternative recommendations included in the Department of Education’s National Advisory Committee on Institutional Quality and Integrity, “Funding of the accrediting agencies comes from the same institutions they are supposed to regulate. The very people who benefit from federal funds, moreover—administrators and faculty who constitute accrediting teams—are the self-same people that determine whether federal funds should flow. They know they will in turn be judged by similar accrediting teams, making them loath to apply rigorous quality measures.”⁴⁶

Once accreditation is separated from the gatekeeping function for federal student aid, colleges and universities could choose among a broad range of recognized agencies to evaluate and benchmark their programs. The accountability metrics crucial to protecting students and taxpayers would be much more effectively and efficiently handled outside the accreditation process. Institutions, meanwhile, would enjoy a greater level of autonomy and freedom to innovate when freed from the obligation to satisfy the accreditor’s idiosyncratic positions on matters of governance and policy best left to the boards of trustees or regents that govern colleges and universities.

2. Ensure transparent performance metrics. Think of the disclosures needed to buy a home and take out a mortgage. They are voluminous—including everything from lead paint and mold to the total cost of loan repayment and mortgage interest charged. There

is little comparable information for consumers taking out student loans.

In early 2013, the Department of Education launched a new “College Scorecard” website where students can find information like cost, average debt, and loan default rates, which is a step in the right direction.⁴⁷ The website, however, lacks context to help families and students understand debt loads, provides no information about postgraduation employment, and does not allow side-by-side comparisons of colleges. This project is similar to the Student Right to Know before You Go Act introduced by Senator Ron Wyden (D-OR), with the cosponsorship of Senator Rubio. Congress could go even further to increase higher education transparency.⁴⁸

President Obama has already called for new metrics by which to rank colleges and universities. This could be the opportunity to provide to the public such key data as

- University failure rates (dropouts, extended time-to-degree completion);
- Student loan burdens;
- Repayment and default rates on student loans;
- Key measures of student learning gains (or whether the school even measures them);
- Average 10-, 20-, and 30-year income of graduates in each major; and
- Job placement rates for vocational programs.

Requiring this disclosure along with the financial disclosures—with hefty penalties for misrepresentation—would go a long way toward protecting the public while avoiding the need for the accreditation bureaucracy.

3. Allow for expedited self-certification by universities and other education providers. Building on the idea of ensuring more transparent performance metrics, Congress could allow institutions that voluntarily submit to rigorous disclosure requirements to

self-certify and bypass regional accreditation agencies altogether.

This model would be similar to that used for generations by companies and nonprofits throughout America, which disclose key information to the Securities and Exchange Commission (SEC) or the Internal Revenue Service (IRS) and are then allowed to proceed with selling equity to or taking charitable contributions from the public.

The Department of Education already requires colleges and universities, for-profit as well as nonprofit, to document financial viability and submit audited financial statements annually. In addition to financial statements, under an expedited approach to federal approval, institutions could submit audited statements that detail three critical areas related to quality:

- Assets—faculty qualifications and learning resources;
- Process—how student academic records and financial accounts are maintained; and
- Outcomes—objective measures of student success.

Upon receipt of these audited quality statements (along with the existing financial statements), a college or university would be deemed to have self-certified and thus be approved to be a recipient of federal funding, without the need for an accrediting agency's involvement. Just as the SEC and the IRS have the right to audit corporate or charitable nonprofit disclosures, so the Department of Education would have the right to audit quality statements and sanction misrepresentation. This expedited process would work particularly well for institutions that are already regulated and approved by state higher education agencies—which includes all public universities and colleges and most private occupational and technical colleges.

If accreditors genuinely want to be private peer review teams, they can—by returning to the voluntary

system of quality assurance and self-improvement that existed before they were made gatekeepers of federal funds. Expedited self-certification would at least partially remove accreditors from their gatekeeping role, freeing them to pursue their original aims.

4. Allow and encourage new agencies for higher education quality assurance.

Currently, accreditors do not sell their services in competition with other firms. Rather, for the vast majority of colleges and universities, six regional accreditors operate as regional monopolies. If a university believes its accrediting agency is stifling innovation, putting unreasonable demands on the institution, interfering with the state constitutional prerogatives of a governing board, or driving too costly a process, the university has no realistic alternative body to which to turn. In fact, the Higher Education Act makes it extremely difficult for a college to switch, keeping universities hostage to an accrediting agency no matter how poorly the accreditor is doing its job. The act states,

The Secretary [of Education] shall not recognize the accreditation of any otherwise eligible institution of higher education if the institution of higher education is in the process of changing its accrediting agency or association, unless the eligible institution submits to the Secretary all materials relating to the prior accreditation, including materials demonstrating reasonable cause for changing the accrediting agency or association.

The Secretary shall not recognize the accreditation of any otherwise eligible institution of higher education if the institution of higher education is accredited, as an institution, by more than one accrediting agency or association, unless the institution submits to each such agency and association and to the Secretary the reasons for accreditation by more than one such agency or association and demonstrates to the Secretary reasonable cause for its accreditation by more than one agency or association.⁴⁹

While many institutions are accredited by more than one agency—for example, the law school and business school at a university may each have a specialized accrediting agency—almost all institutions are also accredited as a whole by a regional accreditor. For purposes of federal funds, the latter is really all that matters.

This state of affairs has drawn commentary from a number of influential observers. Jim Yong Kim, former president of Dartmouth, criticized the geographic structure of accreditation as “unsuited to American higher education,” noting that accrediting agency staff often substitute their own judgment for that of an institution’s trustees and administrators.⁵⁰ Stanford University provost Etchemendy argued that “accreditation is no substitute for public opinion and market forces as a guide to the value of the education we offer.”⁵¹ The American Council of Education convened a taskforce drawn from colleges and accrediting bodies, and although the taskforce did not recommend the complete elimination of the regional system, it observed that “the current regional basis of accreditation is probably not the way America would structure the system if starting from scratch.”⁵²

If Congress wants to continue outsourcing the determination of eligibility for federal funding but remedy some of its problems, it could declare an end to regional accreditors as noncompetitive monopolies and allow institutions to pick from a full spectrum of accreditors, rather than be limited by geography.

Congress could direct the secretary of education to certify other entities that can serve as agencies to determine the quality of education or training offered at educational institutions. Whether JD Powers or a state higher education regulatory body, any number of entities other than the current regional accrediting agencies would be well positioned to take on the task of policing diploma mills and other substandard entities. They would not have the conflict of being a membership organization engaged in peer improvement in addition to ensuring quality. They would focus solely on the latter.

One benefit of opening up the range of entities eligible to certify quality is that it would free colleges and universities to find entities that specialize in their mission. As higher education entrepreneur and StraighterLine founder Burck Smith says, “Today, accreditation applies to over 4,000 colleges with widely divergent missions. Some, like the Ivies, are extremely selective and expensive. Some, like community colleges, are ‘open-access’ and much more affordable. Clearly, every college should not be required to meet the same outcomes.”⁵³ Another benefit would be encouraging innovation. The current accreditation system restricts new providers from offering high-quality, credit-bearing courses that adult and other nontraditional learners can access online. Unless that expert has the time, resources, and inclination to go through a process of approval and adoption by an existing college or university, his course cannot get accredited. It is time for us to see some innovative agencies that specialize in certifying providers offering courses instead of degree programs. Congress should heed President Obama’s State of the Union call and direct the secretary of education to include agencies that will accredit not just entire colleges and universities but also individual courses, competency-based learning tools, and other models of higher education.

Instead of the monopolistic regional accreditors we have today, a more diverse array of quality assurance organizations would allow freedom of choice and true institutional peer review to arise.

5. Create institutional-level and student-level accountability for quality assurance.

Accrediting agencies wield such power because Congress relies on them to ensure that students do not use federal tax dollars in the form of grants and loans at poor-quality institutions. Even if the accrediting agencies had succeeded in ensuring educational quality, there are no eligibility criteria for the massive loans of taxpayer money students take for education. With student loan delinquency and default rates double those of Fannie Mae and Freddie Mac during the height of the

mortgage crisis, accrediting agencies failing to prevent predatory lending, and students graduating with debt but little learning, it is time for Congress to get to the root of the problem by preventing students from borrowing taxpayer dollars without eligibility criteria.

Creating such standards for loans, combined with relying on state agencies to shut down diploma mills, would go a long way toward eliminating the need for the accreditors' gatekeeping role over federal student aid. Among the options are:

- *Establish underwriting standards.* Currently students can take out taxpayer-funded loans with no consideration of their ability to repay the loan. In fact, the only underwriting criterion is that federal loans cannot be used at unaccredited institutions. Congress could create lending standards that deny or cap loan amounts based upon unemployment rates or average income in the field a student is studying. Students would retain the right and freedom to major in whatever subject they want, but there would be a limit on the level of taxpayer subsidy for studies in fields with few jobs and low average income.
- *Require satisfactory academic progress to qualify for ongoing loans and grants.* Accrediting agencies have typically paid little or no heed to the grading practices at schools, allowing the Lake Wobegone effect to emerge. Congress could require that students maintain a certain grade point average (with institutional curbs placed on grade inflation to ensure maintenance of rigor) to remain eligible for loans and grants. Congress could also require that these funds only be used at colleges that have rigorous processes in place to measure value-added learning.

These measures might also put limits on how many times a student may drop out of college and reenroll using federal grants and loans. Conversely, for students who

show great academic progress and quickly advance toward their certificate or degree, the amount of grants or loans could increase, to reward their focus on learning and academic achievement.

- *Provide college grants and loans only to college-ready students.* Congress could state that taxpayer money to fund a college education should only be spent on students who are ready for college. This would require students to demonstrate, before receiving federal loans and grants, that they have met certain college-readiness standards. Many state K–12 systems have adopted college-readiness curricula in high schools, and federal financial aid could be limited to those students who successfully complete such a curriculum.
- *Allow universities to curb excessive student-loan debt.* Congress could also authorize institutions to limit the amount of debt students may assume. Too often, students use student loans (which can appropriately be used to pay for room and board, as well as tuition) to purchase cars, spring break trips, and other expenses that they may not need to obtain an education.⁵⁴
- *Require colleges and universities to share risk in student financial aid.* To reduce predatory admissions policies by colleges and universities, Congress could demand more institutional commitment to student success, using thresholds to establish risk-sharing requirements for universities. For example, each year, colleges would be required to pay down the total dollars in student loan delinquency of their graduates and dropouts that exceed an indexed threshold.⁵⁵

Furthermore, Congress could require an educational return on investment for every

federal dollar invested. In this scenario, Congress would establish a threshold. For example, institutions with overall graduation rates below 25 percent would be ineligible for federal dollars. Schools would also be required to show whether students receiving Pell Grants and federal loans are graduating at a reasonable rate for an at-risk student population. If not, the institution would also be ineligible for further federal funds. A provision for institutions that are successful in graduating at-risk students with demonstrated, verifiable learning gains could grant students at these schools an even higher level of federal aid or different loan repayment rates.

6. Rely on the states. All 50 states regulate the public and private colleges, universities, and occupational schools in their state to protect consumers against fraud and diploma mills. Congress could rely on this extensive, existing regulatory infrastructure rather than accrediting agencies.

For decades, the secretary of education has recognized the New York State Board of Regents and the commissioner of education as an accreditation authority for degree-granting institutions in New York. Currently, the Board of Regents and the commissioner accredit 24 New York colleges and universities. If it works in New York, it is likely to work in the other 49 states. Additionally, since the 1964 Nurse Training Act, the secretary has relied on a number of other state agencies for nursing accreditation, as well as for other vocational training accreditation.

A robust state role could eliminate much of the costly, burdensome, and failed regulatory apparatus of the existing system of accreditation.

Conclusion

Nearly 50 years of outsourcing higher education quality assurance to regional accreditation agencies has

proven to be a dismal failure. Overall graduation rates are low, scandalously so at some institutions. The student loan burden in this country is growing at a dizzying pace: default rates are extremely high, and the cost to taxpayers is staggering. Many students achieve no significant learning gains in college, and employer dissatisfaction with newly hired college graduates continues to grow.

Fixing the quality assurance and accountability system of American higher education is an urgent priority. In the context of the upcoming review and reauthorization of the Higher Education Act, Congress needs to reform and modernize the process for determining college and university eligibility for receiving federal taxpayer funds.

President Obama has proposed a set of reforms to fix what is broken about American higher education.⁵⁶ His proposals to promote transparency and accountability metrics and encourage sector-wide innovation are promising and could move policy in the direction of some of the reforms proposed herein. However, the president has not yet offered any comprehensive proposals to reform college accreditation. Absent such proposals, any plan to reform higher education remains incomplete.

In this paper, I have pointed to several common-sense changes. Access to federal student aid needs to be based on clear metrics that establish an institution's fiscal integrity and disclose its student learning and student success outcomes. Colleges and universities should have a choice of authorized and approved accrediting bodies whose seal of approval would be a reflection of the standards of their peers. As soon as we leave behind the cartel approach, wherein the member institutions in a given geographical region shut out new and innovative providers, students will have the benefit of an expanded range of choices of education providers. Accreditors will have a meaningful future by returning to their heritage as associations that provide peer-evaluation, quality enhancement, and benchmarks for academic quality.

With the relatively simple changes suggested in this report, the United States can have a fully functional

system of higher education quality assurance that protects the taxpayer investment in student financial aid. Most importantly, a reformed system would help protect students and their families from the devastating consequences of uninformed investment in educational services that will have no return except years of staggering debt. The dream of American higher education—high academic standards and broad, affordable access—depends on making these prudent changes to our system of quality assurance.

Notes

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About the Author

Hank Brown is an attorney with Brownstein Hyatt Farber Schreck and heads the Accreditation Reform Initiative of the American Council of Trustees and Alumni. He is the immediate past president of the University of Colorado and also served as the 11th president of the University of Northern Colorado. Before that, he served Colorado in the US Senate and more than five consecutive terms in the US House of Representatives for Colorado's Fourth Congressional District. Brown served in the Colorado State Senate from 1972 to 1976. From 1969 to 1980, he was a vice president at Monfort of Colorado. He was in the US Navy from 1962 to 1966. He likewise volunteered for duty in Vietnam and was decorated for his combat service as a forward air controller.



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Recommendations for the National Advisory Committee on Institutional Quality and Integrity

by Kevin Carey and Ben Miller

New America Foundation

May 2014

The robust national conversation around the future role of accreditation in higher education quality assurance reflects the pressing need to help more students attain an affordable, high-quality college degree as well as the increasingly rapid development of new modes and economic models for learning. Accordingly, this memorandum contains recommendations for both improving the existing system of institutional approval and creating new regulatory structures that adapt to the possibilities of technology-driven innovation.

There are seven main changes that should occur within the existing accreditation system:

1. Increase transparency
2. Create common standards, processes, and application of penalties
3. Create tiers of eligibility for financial aid
4. Create tiers of accreditation
5. Increase the importance of some programmatic accreditation
6. Compensate accreditors more like a contractor
7. Reorient what accreditors must consider in making decisions

While these fixes to the existing accreditation system are important, there is also a need for an alternative pathway to accessing federal student aid that departs from traditional conceptions of higher education providers as institutions and allows new types of providers to operate. This would entail the following changes:



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May 30, 2014

Carol Griffiths, Executive Director
NACIQI
U.S. Department of Education
400 Maryland Avenue SW
Washington D.C. 20202

Dear Director Griffiths,

We appreciate the opportunity to submit comments to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) in the lead up to the June 18-19, 2014 meeting, specifically on the question “What issues are critical to consider in advancing quality assurance in higher education?”

The Council on Social Work Education (CSWE) is a nonprofit national association representing more than 2,500 individual members and more than 700 master’s and baccalaureate programs of professional social work education. Founded in 1952, this partnership of educational and professional institutions, social welfare agencies, and private citizens is home to the sole accrediting body for social work education in the United States. Social work education prepares students for leadership and professional interdisciplinary practice with individuals, families, groups, and communities in a wide array of service sectors, including health, mental health, adult and juvenile justice, PK-12 education, child welfare, aging, and others.

In the upcoming reauthorization of the *Higher Education Act*, CSWE believes in the following policy principles:

- CSWE believes in the importance of a balance during the accreditation process between the accreditors and federal regulations and supports policies which assure an appropriate division of responsibilities between these important parties.
- CSWE supports the elimination of regulations that undermine the strength and independence of the accreditation process and opposes the creation of new regulations that would undermine the independence of the current process.
- CSWE supports policies that recognize the importance of the academic accreditor, and opposes policies which would allow non-academic entities to act as accreditors (i.e. states).
- CSWE joins with the Council for Higher Education Accreditation (CHEA), the American Council on Education (ACE) and other higher education leadership associations in stating that outcomes are best determined by the academic accrediting community, and should not be mandated by the federal government.

- CSWE supports policies that seek to protect the role of each of the important players of “the triad” in the institutional accreditation process, including the U.S. Department of Education, the state authorizing agencies, and the regional accreditors.
- CSWE supports policies that recognize the important role of professional, specialized accreditors especially in improving programs, demonstrating outcomes and ensuring quality, and providing professional expertise.

We look forward to working with NACIQI as the Committee finalizes its recommendations to the Secretary of Education in preparation for the upcoming reauthorization of the *Higher Education Act*.

Thank you,



Darla Spence Coffey
President and Chief Executive Officer
Council on Social Work Education



Jo Ann R. Coe Regan
Director, Office of Social Work Accreditation (OSWA)
Council on Social Work Education

1. Upfront work
2. Allow programmatic accreditors to grant access to federal financial aid
3. Fund learning outcomes validators
4. Start with reimbursement-only

The recommendations below are organized on a continuum from small alterations that could occur within the context of the current system to bigger ones that would require more fundamental change.

Improving the current system of accreditation

Increase Transparency

College officials often cite the burden associated with preparing accreditation reports. But the results of that hard work are almost never visible to the public. Accreditation documents remain private, released only at the discretion of the college and accrediting body. Not only does this mean that important efforts to improve learning go unnoticed, but it also lessens public accountability for ensuring that institutions receiving taxpayer-supported federal student aid funds represent a sound investment of public resources.

While some accreditors have begun publishing parts of their work, the process needs still greater transparency. As a condition of recognition by the U.S. Department of Education and participation in Title IV financial aid programs, both accreditation agencies and institutions of higher education should be required to publicly post their accreditation reports. This should include not just the self study but any documents associated with sanctions or penalties so that the public can be made aware of problems. Relatedly, any new programs approved by accreditors should be reported to the U.S. Department of Education and published at least quarterly so that the public can see what new offerings are now becoming eligible for taxpayer funds.

Create common standards, processes, and application of penalties

The various accrediting bodies employ differing standards, policies, and practices in evaluating institutional quality. In some cases this makes sense—a health program accreditor should have a different approach than an institutional accreditor that looks at large research universities. But the language and standards across broad categories of institutions should be largely similar regardless of whether the college is overseen by Middle States, North Central, or one of the other accreditors.

The Council of Regional Accrediting Commissions, which represents seven accreditors, is already starting this process (see, for example, [this article](#) and [press release](#)). This work will result in consistent interpretations of what it means to be “on warning,” have a “show cause” order, or be subject to other penalties or sanctions. But this work only standardizes punishments, not what it takes for them to occur

or be removed. So while two colleges could face the same exact sanctions, the reasons for why they ended up facing them could be expressed in radically different terms.

What's needed instead is more consistent understanding of underlying standards and requirements and decisions around when and whether to mete out punishments and sanctions. Greater standardization will ensure that there is equitable treatment for colleges regardless of where they happen to be geographically located. It will also discourage the current practice of accreditation shopping, which some less-than-effective distance providers pursue. There is simply no sound argument to be made that various geographic regions of the United States of America differ from one another in a way that requires different terms and standards of quality assurance. There is no distinctly "Southern" conception of "show cause" or a particularly "North Central" philosophy of "on warning." These distinctions are remnants of a time when accreditation oversight was bounded by limitations of transportation and communication that simply no longer exist.

Create tiers of eligibility for financial aid

The current accreditation system operates in a largely binary fashion. Either an institution is approved—bringing with it access to federal student aid funds—or it is not approved and cannot receive government aid. While there may be intermediate stages of approval that dictate how long a college can go before needing to be reaccredited or correct problems before losing accreditation, there is still no variation in access to aid funds.

Such an "only in or out" system makes barriers to both entry and exit too high. Because accreditation approval results in access to all forms of federal aid—including loans, which are the most potentially damaging option for students—there is a strong incentive to be overly cautious about letting new actors into the system. But there is also a strong incentive to keep struggling schools in the system for as long as possible, since the only penalty option is to remove all forms of federal aid, which is likely to be an immediate death blow.

What the accreditation system needs instead is a tiered approach for both entry and exit. On the front end, this process should recognize that initial participation in the federal student aid programs needs to be built around a construction of trust. New and unproven actors should not get immediate access to the full suite of federal aid. Rather, they should start with something akin to reimbursement-only grant funding where dollars are only distributed after students succeed. From there they can build to a more traditional disbursement model of grant dollars, with access to loan funds only coming later. Gradually ramping up aid options lessens the potential taxpayer risk for letting in new actors and also protects students from taking on more damaging financial products right away.

Just as federal aid eligibility should ramp up, so too should aid gradually decline for struggling schools. Colleges where student borrowers consistently struggle with debt should be slowly moved out of the loan programs, then move to a reimbursement-only grant model before eventually leaving the program. Pursuing such a process creates more immediate protections for students at ineffective colleges while

still giving institutions an opportunity to recover. It also makes the immediate application of penalties less problematic.

Create tiers of accreditation

Beyond access to federal student aid dollars, accreditation policies and procedures should also be better tailored to the quality of the institution. Colleges that consistently produce good outcomes—including learning—should not need to undergo as in-depth or rigorous reviews as frequently, while those that struggle need greater oversight than they receive today. Creating tiers for the amount of work that a given school has to do also helps accrediting agencies with resource management, since they would not need to devote as much time to higher-performing colleges.

Accrediting agencies are in the best position to know how to lessen burden on higher-performing colleges, so this idea should be implemented by asking for proposals from the accreditors. The Department of Education would have to ask each interested accreditor to submit a proposal for how it would lessen burden on the top-performing colleges and how the resource savings from this shift would result in increased assessment of lower-performing colleges. Such a proposal would be reviewed by both Department staff and members of the NACIQI. If accepted, this tiered process would become part of that accreditor's regular NACIQI reviews.

In many ways, this process resembles what the Department did with guaranty agencies through the Voluntary Flexible Agreements. In this process, the Department requested proposals for student loan guaranty agencies to suggest ways to reorient their compensation structure more toward default prevention and serving students and away from collection on defaulted student loans. A handful of agencies submitted ideas that were accepted and thus began operating differently.

Increase the importance of some programmatic accreditation

Programmatic accreditation occupies an awkward space in the accreditation system. For some professions, attending a program that has specialized accreditation is crucial for allowing student to sit for a state-mandated licensing exam, obtain certifications desired by employers, or participate in externship opportunities. But programmatic accreditation carries no formalized link to the federal student aid programs. As a result, programs at colleges with institutional accreditation can be offered even if they lack programmatic accreditation.

The logical solution to this problem is to require programmatic accreditation as condition of receiving Title IV aid if such accreditation is necessary for licensure or certification in a given state. This would protect against the most egregious instances in which students attend programs that lack the necessary approvals to possibly be worth the cost. Tying the policy to licensure and certification prevents increases in unnecessary programmatic accreditation in fields that truly do not require it.

Implementing this requirement would present complexities, for two reasons. First, licensing rules are not necessarily consistent across states. For example, becoming a lawyer in Kansas requires completing a J.D. or LL.B. at a law school approved by the American Bar Association (ABA). But in California, a student may sit for the bar exam without graduating from an ABA-approved bar exam.¹ So if the programmatic accreditation requirement were applied based upon the location of the school, then a distance education law school in California could operate anywhere, whereas it would be more limited if the requirement were tied to the state a student lived in. The most logical way to address this issue is to tie student eligibility for federal student aid to the program having programmatic accreditation in the state in which they live or other states in the nearby metro area. While this ensures maximum protection for the student, it does require adjusting the eligibility for federal benefits available to the student depending on where he or she chooses to go to school. This is different from the current system where any student can theoretically access federal aid at an accredited college, regardless of where they live.

The second issue is that some programs may not require programmatic accreditation to sit for a licensing test, but having this type of approval is demanded by employers and carries a substantially greater earnings return. For example, there are multiple different types of certifications for medical assisting. The most in-demand certifications require attending a programmatically accredited program and then allow a student to be certified for up to five years, while students who attend a program without this approval may only be certified for a year. These types of differences exist in a less clear-cut area and may be harder to identify.

The easiest solution to this problem would be one of disclosure, whereby colleges enrolling students would have to present them with the most common certification options for students, identify which one their program qualifies them for, and basic information about each, such as how long it is good for, if it entitles the holder to work in different types of facilities, etc. Providing this information and requiring the student to provide consent that he or she read it would at least make clear what other options might be available.

A more complex solution would be to require institutional accreditors to consider the certification requirements in the field for any new programs they are going to approve and make recommendations about the need for programmatic accreditation. This makes the regional accreditors accountable for making judgments on programmatic accreditation, which expands their current role, but would at least better align the two types of oversight. That said, it would be more complex to implement and take substantially more work.

¹ Many other states will allow graduates from non-ABA approved schools to also join the bar, but often only after practicing for five or more years, which would require bar admission in another state. See https://www.ncbex.org/assets/media_files/Comp-Guide/CompGuide.pdf.

Compensate accreditors more like a contractor

Current accreditors take in funds directly from the institutions they are overseeing. While this could be characterized as a conflict of interest, the real problem is that the path to greater financial enrichment for an accreditor involves doing more business and approving more schools. Instead of collecting fees on a per-college basis, the Department should charge each institution that is accredited or is hoping to be accredited an oversight fee. This would be assessed either annually or upon initial application for accreditation or re-accreditation, whichever is easier. The Department would then choose how to allocate those dollars to accreditors, whether it would be paying accreditors a flat rate per college or some form of more performance-based budgeting that takes into account the outcomes or learning of students at colleges approved by accreditors, or some other manner. This type of financing model would also give the Department flexibility to adjust compensation structures over time as needs arise.

Reorient what accreditors must consider in making decisions

Current federal statute prevents the Department of Education from setting any policies for accreditors with respect to student learning. Such a ban means that the Department has no way to ensure accreditors actually oversee the very activities that are supposed to be at the core of higher learning. While it is not unreasonable to avoid having the Department get deeply involved in each and every aspect of classroom teaching, there is a great deal of distance between such micro-management and blanket prohibition.

Simply put, the ban on creating standards for learning outcomes and measurement needs to be repealed. The void it has created leads to endless searching for insufficient proxies and half-measures of quality that potentially increase burden and paperwork for schools with no betterment for anyone else involved. In its stead, accreditors should be required to set standards for learning outcomes assessment or measurement at major programmatic and institutional levels. The Department would not be able to state the required level of outcomes, but would get some say in ensuring that there is some degree of measurement or assessment taking place. The Department could even approach this process in a flexible manner by developing a list of acceptable options developed through discussions with learning scientists and experts.

Creating a new system of accreditation

For it to be effective, an alternative accreditation system must do more than just overcome flaws of the current system. It must also do things that even a reformed version of the current accreditation system would not be capable of accomplishing. In other words, an alternative system must be about finding ways to approve new types of providers that do not fit our current concept of an accredited college, not just fixing lower-level issues like transparency. To that end, the following reforms could be considered to establish an alternative accreditation system.

Upfront work

The first and most important step to creating an alternative system of accreditation is figuring out what level of academic activity it should accredit. Merely replicating of the current system of institutional-based accreditation would not be appropriate. Current institutions, particularly those at the four-year level, are essentially loosely affiliated fiefdoms of academic departments attached to a central administration. Educational quality can and does vary significantly amongst departments and programs. These crucial differences are lost when focusing only on the bigger organizing entity.

The most granular alternative to the current accreditation system would be to accredit providers at the course level. This has approach has advantages—approving providers that offer a single course would provide a path for the greatest Algebra II instructor in the country to scale his or her course to reach thousands more people than it currently does. But going down to this level introduces other challenges. Approving individual courses without grouping them under some larger curatorial structure—such as a program—means students could start taking one-off courses and accumulate a great deal of learning indicators that do not build into any coherent whole. It would also potentially exacerbate the confusion that already afflicts students navigating a single college’s course catalog by expanding the number of catalogs they could choose from in any given moment by orders of magnitude. Plus, the amount of work that would be required to approve of hundreds of thousands, if not millions of courses, would be significant to say the least.

Operating a new system of accreditation at the program level is the best blend of going more granular than the institution but not so low-level that the idea of a good education building toward something is lost. Accrediting programs ensures that students who take courses from new providers will be in more structured environments that can ultimately lead to some kind of recognized credential and reduce the risk of one-off course taking or significant credit accumulation that does not ultimately lead to anything recognizable in the labor market.

To be sure, this structure limits the degree of inventiveness that would be present in a course-based approval system. But this can be mitigated somewhat by setting up the approval system so that providers do not have to offer every single course in their sequence in order to be approved. In other words, a provider could be approved as essentially a curator of course content from multiple other providers. Students would still be able to take courses for credit and federal aid from a variety of other providers, but their formal relationship would be with the person who constructs these courses into a more coherent whole. This is a distinct departure from current federal aid rules, which place a limit on how much of a program sequence can be offered by providers other than the accredited institution.

Accrediting the curators also dramatically simplifies the financial elements of this system. Curators could work out compensation agreements with individual course providers to ensure they get paid for their courses without the Department of Education needing to form financial agreements with potentially hundreds of thousands of new entities.

This structure might actually spur more innovation than a course-based accreditation system. That’s because the transfer of federal dollars always involves a lot of dull logistical issues that require a fair

amount of staff time and administrative bookkeeping that are likely beyond the capabilities of someone hoping to offer a single, high-quality course. By having curators essentially subcontract with individual providers the people offering courses would not have to deal with thorny issues like how to return federal dollars when a student drops out, ensure proper audit procedures, and all the other vexing cash management issues. They could instead focus on the academic side of things and get paid like a contractor by the curator.

From the student side, accrediting new program curators also sidesteps another major issue around intentionality that would become problematic in a more decentralized system. Current federal student aid regulations require students to be seeking a degree or certificate in order to receive federal assistance. This policy is based on the idea that taxpayer support should go to students who are pursuing their education with a degree of intentionality that is designed to result in some formalized evidence of their learning. Going to a course-based accrediting system would mean abandoning this type of requirement since it would be impossible to ensure that students who are taking one-off courses actually are doing so in furtherance of a credential.

It's fair to argue that the degree and certificate seeking requirement is an unfair standard. After all, community college deans will constantly refer to students who come to take one or two reskilling courses that can immediately pay off in a way that might be just as remunerative as finishing a whole credential. But that is arguably a sign of the incorrect way we construct credentials, not the need to drop the degree or certificate seeking requirement. Clearly, if there is a construction of two courses that can produce enough learning to have a real-world value, it's worth allowing new providers to construct new credentials, likely at the certificate level, that may not look like our typical conception of a sequence that is at least 600 clock hours or some other standardized unit of measurement.

Learning measurement and quality validation also must be addressed. Theoretically, the simplest way to construct an alternative accreditation system would be to make providers eligible if they can show their students are meeting desired learning outcomes. But that would require knowing what those learning outcomes need to be. In some instances this might not be an issue—such as a profession that has upfront licensing or certification requirements or other areas where there is a strong central standard-setting body. But for most programs, especially those tied to associate or bachelor's degrees, such learning outcomes do not exist and would have to be created. This would require the establishment of some kind of independent third party to make such judgments and assessments, which would take time and upfront cost. A viable alternative might be to focus on post-completion outcomes—such as earnings or job success—but that would likely limit what could be approved under this system to strictly vocational programs.

Therefore, a new system of accreditation should be willing to approve providers of programs. These programs would not have any minimum requirement that the provider itself offer a minimum percentage of the actual coursework, allowing both those entities that want to provide all the coursework and those that want to provide a curatorial function with subgrants to individual course providers to co-exist. These programs also must have greater flexibility in their minimum lengths and sizes, allowing for sequences as short as a course to two to be approved if they can demonstrate

concrete benefits in the labor market. And the whole system must be undergirded by rigorous learning outcomes assessment or at least some evidence of labor market success.

Allow programmatic accreditors to grant access to federal financial aid

Programmatic accreditors arguably already look somewhat like the alternative accreditors described above. They consider things at the programmatic level, acknowledging that the proper unit for thinking about quality should be more granular than the institution. Because they assess specific programs they can consider individual subject matter expertise more carefully than a set of reviewers who must look at an entire college. While they are clearly not as cutting-edge as might be desired for a new system, they represent a potential bridge between the old and the new.

Connecting programmatic accreditors to an alternative system requires giving them the authority to oversee access to federal student aid. This differs from the recommendation above, which would require institutional and programmatic accreditation in order to participate in the aid programs. Rather, this would allow programs with specialized accreditation to participate in the aid programs even if they did not have institutional accreditation. This flips the current way of thinking about accreditation on its head—the ability to show learning results at the programmatic level can be a way into the aid programs even if overall institutional conditions do not merit other forms of accreditation.

Fund learning outcomes validators

Setting up third parties that could provide the learning outcomes validation necessary for a third party system would not be cheap. But it would be much less than the tens of billions of dollars that the government currently spends on federal student aid, often at institutions where student outcomes are poor. Using a small pool of funds to help seed the development of these third parties could help get this project moving more quickly. Alternatively, the Department could use its convening power to bring together logical partners to form one of these third parties. This voluntary work would be slower but would at least indicate a level of seriousness about pursuing this avenue.

Start with reimbursement-only

In the absence of learning outcomes validators, one way to start an alternative system would be through reimbursement-only experimentation. Paying providers only after they succeed with students would lessen taxpayer risk as well as reduce bookkeeping and internal controls needs. This does create timing problems for students who may be unwilling to pay upfront for something that may or may not be compensated on the back-end, while requiring degrees to be free at first might create cash flow problems for new entrants. But if the path forward for compensation is clear, then the upfront costs might still be worth it for providers to get outside capital. Many startup companies operate with a clear expectation of initial operating losses, on the theory that future growth will ultimately reward investors.

Once providers start with a reimbursement-only model they could then work their way up to an upfront compensation model. This would mirror the suggested entrance and exit process for providers under the existing accreditation system. The biggest challenge here would be to figure out whether there should be requirements for student charges—e.g., should reimbursement-based providers be allowed to charge tuition and then refund money to students or must the entire upfront offering be free?

WHAT ISSUES ARE CRITICAL TO CONSIDER IN ADVANCING QUALITY ASSURANCE IN HIGHER EDUCATION?

***Judith S. Eaton, President
Council for Higher Education Accreditation***

May 2014

OVERVIEW

Three significant issues are driving the current conversation about accreditation and quality in higher education: rigor, innovation and accountability. There are repeated calls for greater rigor that would result in more demanding educational offerings and degree requirements. Expectations about innovation in higher education – change in traditional content, organization, delivery and pricing – have grown significantly. Demands for greater public accountability, transparency and reliable evidence of institutional performance, continue to resonate.

Right now, these issues emerge through a mostly negative national narrative based on doubt that accreditation is effective in addressing these areas and a mantra that accreditation is “broken.” The federal government is engaged through continuing to expand its regulation of accrediting organizations and developing tools to address quality in higher education - independent of accreditation. For its part, accreditation is addressing the issues at its own pace and within its long-standing structure and operation, responding to changes in the higher education landscape and moving forward with improvements in practice and approach.

As these issues and responses carry into the reauthorization of the Higher Education Act, just getting underway, the likely impact will be extensive, not minor, change in the role of accreditation. Much as we may start out by tweaking law or regulation, we will wind up on a path that substantially alters the accreditation-federal government relationship with regard to educational quality. As things stand now, we can expect government to take a much more prominent role in quality review of higher education, accompanied by diminished significance of the role of accreditation. This transformation is likely to take place whether accreditation remains connected to the federal government through the gatekeeping function (accreditation as a requirement for access to federal funds) or the gatekeeping relationship ends.

This paper will (1) examine these issues and explore their potential to drive fundamental change in the accreditation-federal government relationship; (2) briefly review the National Advisory Committee on Institutional Quality and Integrity (NACIQI) positioning on these issues, based on the 2012 *Report to the U.S. Secretary of Education*; and (3) offer suggestions for NACIQI leadership to advance quality assurance or accreditation going forward. The suggestions are offered at a general level of setting direction and providing leadership for change. By design, they are not couched in the language of specific statutory or regulatory change; this step can be taken at a later time.

NACIQI is the one public sector body that is especially suited to lead a national dialogue that is essential to this emerging transformation of the relationship among government, higher education and accreditation. NACIQI is focused solely on accreditation and federal recognition. It has a diverse membership representing multiple constituents in higher education, quality assurance, students and the public. It has a wealth of experience observing and judging accreditation practice.

THE CURRENT CONVERSATION, EDUCATIONAL QUALITY AND ACCREDITATION

To listen to some members of Congress is to hear repeatedly that accreditation is an ineffectual means to assure quality, allegedly riddled with incompetence and conflict of interest and captive to the past. The credibility of accreditation is at a significant low, especially the federal government's confidence in its work. These days, conversations about accreditation with public officials invariably start with a recitation of what is considered to be inadequate about the enterprise.

Accreditation, it is claimed, does not have sufficient rigor to protect against bad actors or substandard institutions, the result of standards that are not appropriately demanding. It is a barrier to innovation, lacks transparency and thus accountability to the public. Accreditation displays indifference in the face of the big picture in higher education, with its challenges of lower-than-desired graduation rates and higher-than-desired tuition increases, as well as rising student debt and loan defaults.

Key features of accreditation that have been essential to advancing the quality of higher education for many decades are ignored. These include peer review to define educational quality, institutional autonomy that assures a mission-driven enterprise and thus the enormous diversity of higher education and academic freedom that is central to sustaining some of the finest scholarship in the world. The incredibly valuable role of accreditation in quality improvement is routinely overlooked by the federal government.

And, accreditation, particularly since the 2008 reauthorization, has made major strides with regard to the issues we are discussing. Accreditors are revising standards with an eye toward greater rigor and evidence of performance. They are addressing innovation by, e.g., giving renewed attention to competency-based education and assessment of prior learning, as more and more institutions and programs engage or re-engage these practices. Most accreditors have radically increased their attention to student achievement and have taken major steps toward additional transparency, key elements of accountability.

Nonetheless, the federal government, building on its dissatisfaction and apparently unimpressed by accreditation's growth and effectiveness, is enriching its capacity to judge quality apart from accreditation – primarily through initiatives pressed by the White House and the Congress and sometimes involving the U.S. Department of Education (USDE). And, the government persists in expanding regulation of traditional accreditation, primarily through USDE's recognition review, somehow convinced that we can regulate our way to quality and innovation.

With regard to creating federal capacity to judge quality, especially since the last reauthorization, increasing attention has been paid to developing tools for accountability for quality. These tools are free, Web-based and interactive. They provide information to students and the public about institutional admission, retention, graduation rates, financial aid and tuition and provide means to compare these key features of college attendance across all types of institutions. They are part of a major effort to better inform students and the public when it comes to making decisions about attending college.

While *College Navigator* dates back to 2007, both a *College Scorecard* and the *Financial Aid Tool Kit* were introduced in 2013. A proposed draft *College Ratings System* to examine value, affordability and quality is to be available in 2014, with the intent of tying these ratings to federal financial aid by 2018. The Congressional Research Service, in its review of accreditation at the end of 2013, urges that Congress - not colleges, universities or accreditors - should determine student learning outcomes, potentially another tool by which to judge quality. A bill was recently introduced in the Senate to create a national accountability commission that would, among other tasks, develop indicators for quality. This is all taking place within a larger discussion among federal officials about establishing a set of indicators for all colleges and universities receiving federal funds. These might include, e.g., graduation rates, successful transfer, admission to graduate school and job placement. Triggers or minimally acceptable levels of performance for institutions are discussed as well.

During the last 18 months, there have been indications of interest in establishing federal (in contrast to nongovernmental) accreditation. This began shortly after the 2013 State of the Union address with its accompanying document calling for an “alternative system of accreditation” for innovation. A bill has recently been introduced in Congress that calls for states to develop alternative accreditation. The 2012 NACIQI report discussed below contains an *Alternative to the NACIQI Draft Final Report* that discusses replacing current accreditation in part with “consumer information on key measures of quality.”

The latest wave of expansion of regulation of accreditation dates back to the 2005-2006 Secretary of Education’s Commission on the Future of Higher Education, with its very public criticism of accreditation and its call for major reform. Beginning with a 2007 negotiated rulemaking and continuing through the 2008 reauthorization of the Higher Education Act, we have seen a steady enlarging of government oversight: greater and greater numbers of regulations, establishment of sub-regulatory guidance, increasing use of negotiated rulemaking and, correspondingly, increasingly detailed and exacting USDE review of accrediting organizations.

In sum, in the quest for greater or better quality assurance in higher education through enhanced rigor, energetic innovation and expanded accountability, government efforts have focused on either creating alternatives to accreditation to judge educational quality or additionally regulating traditional accreditation. Neither is a sign of confidence or trust in accreditation. Both are signs of the heightened authority of government in relation to accreditation and higher education. At the same time, accreditation continues to improve its capacity to address these issues, with little or no acknowledgment of such efforts from the federal level. Both accreditation and the federal government are addressing rigor, innovation and accountability, but are miles apart with regard to how to proceed. These issues, which might have been seen as bringing the actors together, are dividing the partners in this long-standing relationship.

THE 2012 NACIQI REPORT

The 2012 NACIQI report was issued as this negative narrative about accreditation was just taking shape. It called for action in five areas: (1) the functioning of the Triad (the relationship among the federal government, states and accrediting organizations – the major actors in addressing higher education), (2) federal and state roles in quality assurance, (3) accreditation’s role and scope, (4) data and their role in quality assurance, and (5) the role of NACIQI. Central to the report is the committee’s affirmation that there is a federal interest not only in the quality of higher education, but also in quality assurance. It is no longer enough for government to hold

accreditation accountable for quality. Government needs to engage, guide and manage the quality review that accreditation provides.

The NACIQI report:

- Indicated its interest in encouraging some convergence or centralizing of some accreditation activity: use of consistent definitions, common definitions, common cross-state expectations in consumer protection.
- Encouraged creative thinking about change in accreditation structure and organization: sector accreditation, expedited reviews, differentiated reviews and gradations in accreditation decisions.
- Urged significant improvement in data collection and analysis: data accuracy, external auditing of data. This included providing additional information to the public such as accreditation reports.

The NACIQI report included attention to the policy role of NACIQI: the importance of its focus on the overall health of accreditation, its commitment to change in the recognition process and the significance of sustaining and enhancing NACIQI's public policy role. The *Alternative Report* addressed the gatekeeping role of accreditation and how it might be replaced, recommending an end to the current relationship between the federal government and accreditation.

NACIQI AND ADVANCING QUALITY ASSURANCE

The current conversation, the issues and the responses and its 2012 report position NACIQI to lead national efforts to advance quality assurance in higher education and to offer recommendations that provide a badly needed comprehensive framework within which to move forward. NACIQI might consider three key actions.

- *Take a "Fresh Look"*: Identify duplicative or unnecessary law and regulation that get in the way of effective accreditation and recommend action to alter or remove. It is time to replace the negative national narrative about accreditation with a conversation about a constructive agenda for change.
- *Develop Guiding Principles*: Answer the emerging fundamental question of what role the federal government wants accreditation to play and develop guiding principles to drive future law and regulation as well as address expectations of the "big picture" focus of accreditation, accompanied by recommendations for action. We need a fresh foundation for action.
- *Revisit Key Roles (The Triad)*: Acknowledge that the longstanding Triad description of the expected roles that the federal government, accreditation and the states are to play in relation to higher education no longer applies and recommend action both to frame the future roles and to affirm their place in law or regulation. We cannot remain tied to perceptions of what we do that no longer apply.

“Fresh Look”

Analogous to the call for a “fresh start” or “weed the garden” approach to current reauthorization of the Higher Education Act offered by Senators Lamar Alexander, Michael Bennet, Richard Burr and Barbara Mikulski and their Task Force on Government Regulation, we need a NACIQI-led “fresh start” solely for accreditation and the recognition process. We need leadership for the emerging transformation of accreditation. If helpful, the NACIQI effort could be coordinated with the Task Force. Absent such an effort, reauthorization will result in compounding an already incoherent regulatory regime. We are beyond small fixes.

Reading current regulation and sub-regulatory guidance on accreditation makes it clear that, at present, USDE lacks a systemic, coherent basis for review of accrediting organizations. As is typical with most regulations, these have grown episodically and erratically over time, in response to changes in the law, changes in the environment and political desires. The net result is often regulation of the inessential and the inconsequential, accompanied by redundancy and irrelevancy. It is regulation for the sake of regulation, with its initial purpose obscured. Much of the regulation is not grounded in any evidence that quality is improved and students are well-served.

Accreditors are forced to devote endless hours and resources to providing information that is essentially useless when it comes to advancing educational quality for students. What is achieved through requiring the head of an accrediting organization to place his or her biographical statement on a Website? Who actually reads the 300-500 documents that accreditors routinely say are required for a federal recognition review? When will we end the policy Catch-22 in which accreditors find themselves? Accreditors are (1) told they must have policies in certain areas, (2) they create the policies and (3) the policies have not yet been used because no circumstances have compelled their use. Yet, in the course of a recognition review, accreditors are then told that they are out of compliance because, following the regulations, they established the policies - but did not implement them.

The problems go beyond the ineffectiveness and inefficiency of the regulations. Some regulation is actually harmful. As discussed above, accreditation is called upon to achieve greater rigor, to lead innovation and to enhance public accountability. Yet, the regulations oftentimes do not allow, much less encourage, significant departure from past accreditation practice as sanctioned by USDE.

Accreditors are effectively punished for creative approaches that will robustly address rigor, innovation and accountability. With regard to rigor, accreditors issuing some form of negative sanction to an institution or program (per regulation on warning, show cause or termination) are met with vigorous political resistance from a college or university, often with support from local or state officials or a member of Congress. When it comes to innovation, the recent regulation defining the credit hour in relation to competency-based education is a case in point. The use of the credit hour definition must be enforced by accreditors. However, the rule discourages the development of competency-based approaches to teaching and learning because the credit hour definition calls for measuring by seat time. This conflicts with a core purpose of competency-based education: to be innovative through making judgments about what students can do rather than how long they can sit. With regard to accountability, accreditors are pushed for greater transparency in their operation. But, regulations, such as those that prevent accreditors from discussing any USDE investigation of an institution with that institution, get in the way.

Even going beyond these issues, a fresh look could mean, for example, examining whether law or regulation need to continue to involve the accreditation process with the courts, as is currently required, especially when it comes to negative actions and appeals. What if, instead, accreditors and their institutions and programs agreed to some form of mediation or arbitration to address differences? This would lower costs and render accreditation more efficient, while preserving appropriate due process for institutions and programs.

Turning to another example, accreditation and the public would benefit from a reconsideration of substantive change provisions in current regulation. Substantive change regulations often freeze institutions in place when these schools seek to quickly respond to student or public needs. Colleges and universities are constrained by provisions that shackle both institutions and accreditors, diminishing the needed spontaneity and creativity of institutions in responding to the rapidly changing landscape for higher education to better serve students.

A fresh look can mean so much: a useful streamlining of federal recognition review as well as creative change to law and regulation that hamper the effective functioning of both accreditation and institutions.

Guiding Principles

A fresh look needs a foundation. It is not enough to talk about eliminating or modifying current law and regulation. Recognition review needs to be grounded in some principles that capture a vision of an appropriate role for federal law and regulation in relation to accreditation. The fresh look could be built on two straightforward principles. The first principle would affirm the scope of recognition oversight: *A law or regulation must be directly related to holding accreditors accountable for educational quality.*

A second principle would address “What counts as directly related?” and would describe the expected role of accreditation: *Accreditation’s role is threefold, to:*

- *Help students to learn*
- *Improve institutional or program academic performance*
- *Promote quality innovation*

If law and regulation do not support or enhance accreditation’s role, they need to be changed or eliminated.

The guiding principles need to be clear that there are roles that accreditation should not play. Accreditation, in the law, is described as a reliable authority on educational quality. In this capacity, it is not the job of accreditation, for example, to enforce fire codes, to do USDE’s work to enforce student financial aid regulations, to decide the mission of a college or university or to make business decisions about mergers and acquisitions. The guiding principles should also encourage accreditation to focus on the big picture of higher education by further concentrating accreditation reviews on strengthening teaching and learning and providing assistance to institutions about educational quality that can lead to more rigor in degrees and improved completion.

Revisit Respective Roles (Triad Changes)

The Triad dates back to the development of the Higher Education Act and emerged as a means of identifying and coordinating the respective roles of the federal government, accreditation and the states in relation to higher education. The federal government assures fiscal and administrative integrity of institutions; states play an authorizing and consumer protection role;

accreditation assure quality. As a means of approximating the expectations of each of the actors, the Triad worked for many years. Now, however, these descriptions of respective roles are less and less applicable. The federal government is increasingly involved in consumer protection, a Triad task once primarily performed by the states. The federal government, in building capacity to judge educational quality, has moved into a sphere heretofore, in the Triad, within the province of nongovernmental accreditation. States may move in here as well, encouraged to become providers of accreditation. Accreditation is now charged with some responsibility for student financial aid oversight, according to the Triad, once the province of the federal government. It is time for leadership to restate these roles, building on what the federal government and states need from accreditation and the strengths that accreditation brings to quality assurance.

ACCREDITATION IS MUCH MORE THAN THE SUM OF FEDERAL DEMANDS

While much of the recent attention to accreditation has concentrated on its role in relation to government, it is useful to remind ourselves that accreditation is much more than a means to assure that federal funds make their way to quality and not substandard institutions, as important as this is. Accreditation, for the past 100 years, has played a huge role in affirming the academic legitimacy of colleges, universities and programs as well as providing vital leadership in quality improvement.

Accreditation plays a unique role in sustaining the core academic values and key features of higher education, briefly mentioned above. Standards and practice are based on and reinforce the vital role of institutional autonomy in sustaining academic leadership, academic freedom as essential to outstanding research and scholarship, a mission-driven enterprise central to promoting diversity of institutions and peer review as a means of maintaining and enhancing academic rigor as well as building a sense of academic community.

Accreditation has long been this country's essential indicator of academic quality. An institution must be accredited to have any credibility at all. The private sector - corporations and foundations - relies heavily on accredited status when making decisions to contribute financially to higher education and to make decisions about tuition assistance and the hiring and upgrading of employees. Around the world, governments, higher education professionals and quality assurance professionals rely on accredited status to affirm that they are working with reliable colleges and universities. Accreditation, as discussed above, also has a long history of effective quality improvement: assisting institutions in strengthening, advancing and otherwise making changes in order to better serve students and society. The commitment to quality improvement extends to the accrediting organizations themselves.

All of this means that, to advance quality assurance as discussed above, it will not be enough for only the federal government to act. Accreditation needs to take steps on its own and for itself. Independent, creative accreditation investment in rigor, innovation and accountability is essential. There is work that accreditation must do that the federal government cannot do.

For accreditation, it is time to move beyond standards that set only threshold expectations for colleges and universities and seek improvement, as valuable as these practices are. Accreditation needs standards that assure that the highest expectations of performance and effectiveness are met, based on rigorous and challenging scrutiny. Accreditation standards that call for the best of institutions and programs are essential for the future. There is no room for substandard institutions, even if they are trying to improve. Students deserve better.

Accreditation plays a vital role in current innovation in higher education through examining and encouraging change in its accredited institutions and programs. However, current innovation now includes emerging non-institutional providers that offer massive open online courses, private course offerings and badges – sometimes using competency-based approaches or assessment of prior learning. Accreditation can provide leadership here as well, advancing innovation through expanding and strengthening external quality review as needed, whether through their own organizations or working with others to make this happen.

Accreditation needs to bring even greater visibility to the significant strides that have been made in public accountability since the last reauthorization of the Higher Education Act: (1) transparency in accreditation activities and actions with regard to institutional and program performance and (2) primary emphasis on requiring evidence of student achievement as central to any determination of quality. Accreditation needs to take a more assertive role as the country seeks to improve the overall effectiveness of higher education, responding to public concerns about, e.g., graduation and completion of educational goals and the expected level of competence of students who move into the world of work, citizenship and contribution to society and culture.

SUMMARY

To advance quality assurance, NACIQI can serve as the thought leader in addressing current educational quality issues through (1) taking a fresh look at law and regulation affecting accreditation, (2) establishing a new foundation for national expectations of accreditation through articulation of guiding principles and (3) offering a new distribution of responsibilities among the major actors that play a role in the accreditation-federal government relationship. This will enable accreditation and government to move forward to more effectively address rigor, innovation and accountability.

The alternative is to continue an unproductive conversation in which future law and regulation will be built on discontent and complaints, not answers to the vital, constructive question of “What do we need from accreditation?” The result will be a reauthorization in which federal government, less equipped to judge educational quality, comes to dominate higher education decision-making, replacing the judgment of academic professionals. The country will be wasting accreditation - its most valuable resource for assuring and improving quality - whether we are talking about rigor, innovation or accountability.



2014 PUBLIC POLICY AGENDA

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2014 Public Policy Agenda

From the President

I am pleased to present the American Association of State Colleges and Universities' *2014 Public Policy Agenda*. This annual statement of policy principles and positions guides the association's advocacy efforts on current and developing issues at the federal and state levels.

With mid-term elections only months away, 2014 is already shaping up as a year of great political and policy challenges for higher education. While the fiscal affect of the financial crisis and the great recession has abated, public higher education across the nation is still reeling from the effects of the enormous cuts it endured. The *de facto* privatization of public higher education is a matter of great concern to our members and to the public that relies on the availability of affordable, accessible state institutions. AASCU has taken on the challenge of not only mitigating, but actually reversing the disturbing trend of state disinvestment in an important policy proposal we developed as part of a coalition seeking significant changes to the Higher Education Act as it comes up for reauthorization this year.

Beyond diminished public resources, state institutions face the same set of demands from the public and the policy community with regard to outcomes and accountability. AASCU supports federal efforts for improved accountability and greater transparency for colleges and universities participating in federal student assistance. As public institutions, our members respect and understand the public's right to demand good educational and economic outcomes for students after they leave their institutions. AASCU believes that effective accountability metrics can be devised in a manner that provides meaningful information to the public and respects the heterogeneity of institutional missions.

The Administration's proposed Postsecondary Institution Rating System can be a component of a broader effort to promote accountability and transparency. Devising a rating system that can equitably and effectively capture the relevant attributes of a large and diverse universe of postsecondary institutions will be

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a daunting task. The inherent difficulties of constructing a meaningful ratings system need not, however, be fatal.

The Administration has not revealed how they propose to configure the rating system and little is known about the process and the timeline for its launch. AASCU is actively engaged with the Administration and other stakeholders, and we will join the ensuing national conversation in good faith in an effort to promote a reasonable and credible accountability framework that serves all stakeholders.

The *2014 Public Policy Agenda* is intended to serve as a point of reference for AASCU members and other interested organizations, as well as federal and state policymakers. The association and its members are committed to ensuring that the public purpose of public higher education is served.



Muriel A. Howard

President

Public Colleges and Universities are Essential Partners in Meeting State Needs and Objectives

America's state colleges and universities serve a critical role as the linchpin of the nation's human capital development strategy. Not only are they the main venue for broad and affordable access to high quality higher education for some four million students, they also serve as engines of civic engagement and economic growth for their communities and the nation. Public colleges and universities are unique institutions of higher education in that they balance their primary mission, the advancement of learning, with specific service obligations to the citizens of their respective states. The pursuit of academic excellence while remaining academically and financially accessible are defining characteristics of state colleges and universities. Public institutions are gateways to educational opportunity and economic success for all Americans, and serve as proud and indispensable venues for minority access and success. The following policy recommendations represent the framework within which public institutions can successfully serve the important functions that they are assigned in a financially sustainable and publicly accountable manner. Policymakers should consider public colleges and universities integral partners on state initiatives across the public policy spectrum, including P-12 education, economic development, health care, environmental concerns and social challenges.

The State Role

Sufficient and Sustained State Funding Remains the Central Policy Priority for Public Higher Education

The top priority for American public higher education leaders today must be a relentless call for states to provide sufficient, consistent and sustained state funding in order to keep college affordable for all students, especially those from modest economic circumstances. The majority of all other higher education policy issues in recent years stem from changes in college

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affordability, among them: educational attainment, institutional productivity, cost containment, financial aid, innovation in program delivery, and student persistence and completion. While all stakeholders play a role in financing a public college education—the federal government, states, institutions and students—the primary driver of higher tuition prices over the last several decades has been the state-to-student cost shift borne out of state disinvestment in public higher education. For several decades, per-student state support for public higher education has eroded, a trend accelerated by the economic downturn of the last several years.

Policy Action:

- Advocate for increased state investment in public higher education, and promote policies that align federal and state practices in support of greater affordability and improved access.

Federal Leveraging of State Higher Education Funding Can Improve College Affordability

One strategy for incentivizing states to increase their fiscal commitment toward public higher education (collectively \$72 billion) is to better leverage the \$178 billion in federal aid provided to students and campuses through “maintenance of effort” (MOE) provisions in federal spending legislation. MOE provisions establish a threshold of state financial support required in order to receive federal funding; such provisions can provide powerful incentives for state policymakers to maintain their financial support for public colleges and universities and mitigate tuition increases. A new federal-state funding compact must leverage considerable federal monies, include a non-arbitrary state funding threshold, and contain a sound distribution formula.

Policy Action:

- Encourage and promote strategies for leveraging federal resources to incentivize state higher education funding.

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Equitable and Mission-Focused State Performance-Based Funding Systems Can Enhance Student and Institutional Outcomes

Legislation that links state higher education appropriations to select institutional outcomes, commonly known as performance-based funding (PBF), is an increasingly popular financing policy mechanism. PBF programs should be a collaborative effort among key stakeholders to build an incentive structure that respects and reinforces campus missions; encourages campuses to recruit, retain and graduate low-income and nontraditional students; and remains compatible with state higher education goals.

Policy Action:

- Support state funding systems that involve public comprehensive university leaders in system design and which recognize and reward outcomes consistent with the missions of these institutions.

State Investment in Need-Based Student Aid Programs Increases College Affordability

State student aid programs augment federal efforts to provide aid directly to students to keep college affordable. States should continually invest in these programs, but not to the detriment of the state's main responsibility of providing operating support for public colleges and universities. State student aid programs were originally designed to aid low-income students, but have shifted to emphasize academic merit over financial need. Research indicates that merit-based state student grant aid programs are a less efficient use of scarce state resources than need-based aid and end up benefitting students from wealthier backgrounds at the expense of those from lower-income households.

Policy Action:

- Promote increased state investment in need-based student aid programs.

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Funding Gimmicks Like “Pay It Forward” Are Backdoor Ways of Accelerating the Privatization of Public Higher Education

In recent months, a simplistic proposal to fund “tuition-free” public higher education through a flat tax on students’ future earnings (“Pay It Forward”) has gained visibility as a potential solution to college affordability. In reality, Pay It Forward is an actuarially unsound gimmick to shift the full cost of public higher education from one generation of students to the next, and, if adopted, would create a path of least resistance for the withdrawal of state funding at public institutions.

Policy Action:

- Discourage “Pay It Forward” legislative proposals as legitimate public higher education funding models.

States Should Maintain Oversight in the Authorization of Online Postsecondary Programs

AASCU endorses strong accountability measures for all postsecondary educational providers. We fully support the states’ obligation and right to exercise oversight of online and other distance-based courses and programs delivered to citizens within their state jurisdictions. We support the engagement of states in orchestrating the authorization of postsecondary programs, working in either consortia or compact arrangements.

Policy Action:

- Support collaborative efforts to address federal regulations involving “state authorization” of online programs.

Strong Alignment of P-16 and College Curriculum is Critical to Student Success

AASCU supports the Common Core State Standards. Students’ academic preparedness for the rigors of college-level work is fundamental to their success in higher education. A strong high school curriculum aligned with college standards is integral to student success and should be available to all students. AASCU strongly endorses the Common Core State Standards in

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mathematics and English language arts for grades P-12. We call on states to facilitate the timely implementation of the Common Core, develop sound assessment mechanisms, and ensure collaboration among stakeholders in the P-16 continuum.

Policy Action:

- Encourage strong state engagement with P-12 and higher education in the implementation and assessment of the Common Core State Standards.

Keep Authority to Establish Campus Security and Weapons Policy with College Officials and Governing Boards

AASCU remains disappointed over continued attempts by state lawmakers to strip college presidents and public university governing boards of their authority to regulate concealed weapons on campus. Nearly every higher education and law enforcement stakeholder group has steadfastly opposed legislation that allows individuals to carry concealed weapons on campus.

Policy Action:

- Oppose state legislation that seeks to strip institutional and/or system authority to regulate concealed weapons on campus.

The Federal Role

The federal government has historically played a significant, but secondary, role in higher education finance through bridging the gap between college prices and family means. Since the 1980s, as many workers' real incomes have stagnated and inflation-adjusted college costs have escalated, the gap between American families' ability to pay and college costs has widened to unprecedented levels. The shortfall between resources available to students and college costs is identified through a federally-defined need analysis that is intended to equitably divide responsibility for the total cost of attending college among students, families, states, the federal government and other stakeholders. Federal student aid, in the form of grants, loans and work-study,

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is then made available—based on federal budgetary choices—to fill the gap. Over the past three decades, despite significant funding increases on the part of the federal government, the federal aid package has shifted decisively in the direction of loans and debt-financing of higher education. This trend, in turn, has created a national educational debt crisis, with an outstanding volume that now exceeds \$1 trillion. As public concern about educational debt has grown, policymakers are attempting to devise financing alternatives. The following broad areas of federal policy would be key components of any overhaul of federal student aid programs.

Reform Federal Need Analysis

AASCU supports reforming the federal need analysis formula to better target federal funds to the neediest students. Federal financial aid eligibility is calculated through the difference between the Cost of Attendance (COA) and the Expected Family Contribution (EFC). Each institution of higher education has a different COA, but the EFC is calculated through a federal formula. EFC has changed over several decades to become a less credible measure of students' ability to pay for college. Consequently, the federal Pell Grant has lost some of its original focus on the neediest, leaving too many low-income students having to borrow for their education and dissuading many from completing college.

Policy Actions:

- Revamp need analysis to more accurately ascertain families' ability to pay for college.
- Eliminate special treatment of different classes of assets and income to ensure equitable treatment of all applicants based on their financial circumstances.

Increase Federal Grant Aid

The composition of federal student aid has shifted from grants to loans. While cost-containment has captured most of the attention as a policy remedy to stop this trend, only a re-balancing of grants and loans can truly reverse it. Properly income-targeted grant funding can and should, at least partially, level the playing field for the neediest students, most of whom would still need to work

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and borrow to fully cover the cost of their education. But public perception that student aid constitutes an unsustainable burden on the federal budget has created an echo chamber calling for cost-saving reforms that too often limit access for at-risk students. Proposals leading up to the reauthorization of the Higher Education Act (HEA) generally point in the direction of “reforming” student aid to direct its finite—and allegedly unsustainable—spending to produce better outcomes, often mechanically equated with college completion. Various plans would tie institutional eligibility for federal aid to completion rates, would limit student eligibility to a predicted likelihood of completing a postsecondary program, and would federally define academic progress. These policies, if adopted, would severely undermine access and equal opportunity for the neediest students.

Policy Actions:

- Increase grant aid and distribute it solely based on need.
- Oppose imposition of non-need based criteria as pre-conditions or limitations on grant funding for students.

Keep Student Debt Manageable

To properly address growing concerns about college affordability and the educational debt crisis, federal policy must reform student and family borrowing policies and reconsider terms and conditions associated with student debt. Universal Income Based Repayment (IBR) is the way forward, with opt-out possible for those who prefer standard amortization options. The federal government has transformed student debt from a form of subsidized assistance into a profitable federal financing activity, the net revenues from which exceeded all federal student aid spending last year.

The Department of Education lends more than \$112 billion a year in federal loan capital to students and parents for college attendance, and outstanding federal student loan debt exceeds \$700 billion. These loans are exceptionally lucrative because they carry interest rates far above what it costs the federal government to fund and administer them. In addition, student loans represent a unique and highly collectible lending activity because they are not

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dischargeable in bankruptcy and the federal government can force repayment through wage garnishment, tax refund and social security intercepts, and debt collection agents. The profitability of student loans and the ease of collecting on them have ended willful defaults, or federal losses due to interest- or credit-risk.

Policy Actions:

- Reduce student (and parental) loan interest rates to better reflect program costs and eliminate excess profits for the federal government.
- Simplify loan repayment options by consolidating duplicative and confusing choices.
- Improve loan servicing.
- Create a well-configured income-based repayment system as the main repayment path for borrowers, but allow borrowers to opt out in favor of standard amortization alternatives.
- Eliminate the statutory definition of default that is a holdover from the guaranteed student loan program, and clarify that federal student loans remain collectible until paid off, discharged, or forgiven.

Prepare Students for Gainful Employment

A large number of programs that currently participate in Title IV programs are eligible for federal dollars only if they “prepare students for gainful employment in a recognized occupation.” These include virtually all programs offered by for-profit providers, and an even larger number of non-degree certificate programs offered by public and not-for-profit providers. AASCU recognizes the need for better accountability—based on actual labor-market outcomes—for these programs, regardless of the type and control of institutions offering them. For too long, programs of questionable quality have been marketed by shoddy providers as “preparing students for successful careers.” These programs typically rely on heavy advertising and high-pressure sales tactics, and often leave their former students—drop-outs and graduates alike—with high levels of debt and little to show for it in terms of improved employment rates or wages. AASCU endorses a broad and multi-faceted analysis of outcomes associated with such programs to ensure that they meet the policy goals of the underlying statute.

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Improve and Protect Accreditation

AASCU supports the uniquely American tradition of quality assurance in higher education through non-governmental peer review, also known as accreditation. The logic behind deference to accrediting bodies in the HEA to evaluate institutional academic integrity continues to be valid and should be preserved. However, shortcomings in accreditation should be addressed by policymakers. This process is increasingly unable to assure the public that it is an effective mechanism of ensuring institutional integrity. Second, as federal demands on accreditation have become increasingly more prescriptive, it has lost the original clarity and focus it enjoyed as a purely voluntary undertaking. Finally, accreditation has become too procedural and too costly, and is perceived by many as stifling innovation.

Policy Actions:

- Work collaboratively with all stakeholders in reviewing and revisiting accreditation's role within the triad: the federal government, states and accreditation.
- Strengthen accreditation by clarifying its role in establishing institutional eligibility for Title IV.
- Preserve the American tradition of political non-interference in academic judgments about programmatic quality.

Support Accountability and College Completion

AASCU endorses and welcomes the national conversation on accountability in higher education. As public institutions, accountability for state support is an ingrained feature of AASCU institutions; the same expectation to federal dollars is not intuitively unreasonable. AASCU has already launched several important initiatives in support of greater institutional transparency and accountability, most notably the Voluntary System of Accountability (VSA), co-sponsored by the Association of Public and Land-grant Universities. AASCU is committed to engaging and collaborating with other accountability efforts, particularly the Obama administration's proposed college ratings and revised college scorecard initiatives. The administration has outlined a conceptual approach to defining outcomes and accountability that merits serious investigation and consideration, although any final verdict on its utility will depend on how administration officials resolve key details.

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While policy complexities of defining the purely financial metric of “gainful employment” have proven challenging, proper accountability definitions for academic programs, whose value has generally been viewed as transcending purely economic considerations, are even more complicated. Graduation rates, as defined under current law, are inadequate measures of institutional success because they fail to capture transfers and many part-time students. Furthermore, economic evidence strongly suggests that high-quality postsecondary education produces tremendous direct and indirect socio-economic benefits that accrue even to those who do not complete degrees. What’s more, over the long term—the entire working life of each tracked cohort of students—some of the most abstract, least vocational academic disciplines counter-intuitively outperform the most labor-market-oriented vocational offerings of colleges and universities. These two factors—that completion may not be the best measure of individual or societal return-on-investment and that narrow short-term metrics can actually mask the true economic value of higher education—should both be carefully factored into any efforts to define institutional accountability or incentivize student behavior.

Policy Actions:

- Support and assist with federal accountability initiatives.
- Collaborate with Congress and the administration on devising reasonable financial aid policies to reward institutional accountability and effectiveness.
- Promote completion and graduation, but not at the expense of reasonable access or academic quality.
- Protect students from punitive policies that unfairly limit their access to higher education.
- Promote diversity in higher education and oppose policies that have a disparate impact on minority and underserved populations.

Support Appropriate Data Reporting

AASCU believes in the appropriate use of valid and reliable data to support accountability, institutional transparency, and public disclosures for federal and state financial aid programs. In addition, the association endorses the collection, analysis and disclosure of outcomes data as a means of providing institutional transparency and ensuring public accountability for federal and state financial aid programs. The Voluntary System of Accountability (VSA) and the Student Achievement Measure (SAM) are examples of initiatives through

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which AASCU seeks to better inform all stakeholders of outcomes data. AASCU recognizes institutional costs associated with federal data collection. The association supports efforts to streamline data collection, apply cost-benefit and privacy principles to new data collection efforts, and reduce, where possible, the effect of data collection on individual privacy and institutional workloads.

Policy Actions:

- Support the collection of data needed by the federal government for purposes specifically authorized by law.
- Balance benefits to be derived from the collection of new data with institutional compliance costs and individual privacy concerns.

Promote Innovation

Innovation and continual improvement are important aspects of public colleges and universities. As the need for higher education is growing much faster than traditional means of delivery, the higher education community must point the way forward through the development of innovative models of content delivery and credentialing. AASCU supports efforts to innovate and reinvent various aspects of higher education through new policies, programs and practices.

Policy Actions:

- Support new and emerging forms of instructional and program delivery.
- Support competency-based education.
- Support prior-learning assessment.

Support Immigration Reform

An estimated 11.5 million people in the United States—individuals and families who work and contribute to the nation's economy and are quite unlikely to collectively disappear—are undocumented. Many of the undocumented were brought into the U.S. as children, and know no other homeland than this country. This latter group certainly deserves immediate access to higher education. AASCU supports the passage of state and federal DREAM Acts to

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enable such students to participate in higher education and map out a strategy for full citizenship. In addition, states should have the full authority to set tuition policy for undocumented students. Further, the number of H1-B visas and green cards should be expanded.

Policy Actions:

- Support comprehensive immigration reform.
- Support the federal DREAM Act legislation and passage of state-level DREAM Acts.
- Support expansion of H1-B Visas.

Support Higher Education in Tax Policy

The tax code has been a strategic tool for middle-income families to address costs associated with a college education. While tax policy does not reduce the college costs at the outset, it does provide assistance to students and families on a retroactive basis. As such, AASCU strongly supports reform of multiple current tax credits and tuition deductions that involve tax benefits for both students and institutions.

Policy Actions:

- Make permanent, simplify and improve the American Opportunity Tax Credit.
- Eliminate tax liability on loan forgiveness programs.
- Expand student loan tax deductions.
- Expand employer-provided educational assistance benefits.

Strengthen Teacher Preparation

AASCU institutions, many of which were originally founded as normal schools, are deeply committed to teacher education, preparing more than 50 percent of all teachers certified annually in the United States. Growing national alarm about the rigor and performance of the P-12 system certainly concerns AASCU institutions as well. Too many students come to college unprepared and in need of remediation, and the problem is worsening. The shortcomings of our P-12 system contribute to the already daunting challenges colleges and universities face with regard to cost, outcomes and accountability. AASCU is

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committed to a candid, fact-based examination of the role that its members could and should play in promoting better outcomes at the P-12 level. Teacher education programs at AASCU institutions will collaborate with other stakeholders to continually improve and strengthen their curricula, instruction and clinical practica “so that candidates develop the knowledge, skills, and professional dispositions necessary to demonstrate positive impact on all P-12 students’ learning and development” that include high-quality clinical experiences that are “are early, ongoing, and take place in a variety of school- and community-based settings.” (CAEP, 2013)

Policy Actions:

- Encourage teacher preparation programs at AASCU institutions to renew and strengthen their relationship with local P-12 schools by ensuring “that high-quality clinical practice is central to preparation so that candidates develop the knowledge, skills, and professional dispositions necessary to demonstrate positive impact on all P-12 students’ learning and development.” (CAEP, 2013)
- Encourage AASCU institutions to partner with local PK-12 schools and communities to develop strategic approaches to college readiness that are research-based, intentional, sustained and evaluated.
- Promote exemplary strategic college readiness models developed by AASCU members and their PK-12 partners and communities.

Evaluation of teacher education programs should be based on valid, reliable and objective data. Accountability measures should not politicize teacher education by assessing programs on a single attribute (such as curriculum), but rather examine the totality of the educational cycle and experience. AASCU supports calls for greater accountability and outcomes transparency for teacher preparation programs.

Policy Actions:

- Encourage state efforts to develop appropriate licensure standards on the basis of valid, reliable and objective data, and align assessment of teacher preparation programs with those standards.
- Ensure that states evaluate all teacher preparation venues using the same standards.

Improve Educational Opportunities for Veterans and Servicemembers

AASCU and its institutions have had a decades-long tradition of serving the educational needs of veterans and active-duty members of the Armed Forces. This partnership is all the more needed now, as the Armed Forces downsize

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and begin the orderly transition of servicemembers to productive and fulfilling civilian lives. AASCU is committed to working with the Departments of Defense (DoD), Education and Veterans Affairs to ensure optimal access and successful outcomes for servicemembers and veterans.

Policy Actions:

- Support the continuation and proper funding of the DoD Tuition Assistance Program.
- Support the maintenance and improvement of GI Bill educational benefits.
- Improve coordination among the agencies with regard to the unique needs of servicemembers and veterans.
- Support Executive Order 13607—Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members.

Delivering America's Promise

AASCU's membership of more than 400 public colleges and universities is found throughout the United States, Guam, Puerto Rico and the Virgin Islands. We range in size from 1,000 students to 44,000. We are found in the inner city, in suburbs, towns and cities, and in remote rural America. We include campuses with extensive offerings in law, medicine and doctoral education—as well as campuses offering associate degrees to complement baccalaureate studies. We are both residential and commuter, and offer on-line degrees as well. Yet common to virtually every member institution are three qualities that define its work and characterize our common commitments.

- We are institutions of access and opportunity. We believe that the American promise should be real for all Americans, and that belief shapes our commitment to access, affordability and educational opportunity, and in the process strengthens American democracy for all citizens.
- We are student-centered institutions. We place the student at the heart of our enterprise, enhancing the learning environment and student achievement not only through teaching and advising, but also through our research and public service activities.
- We are “stewards of place.” We engage faculty, staff and students with the communities and regions we serve—helping to advance public education, economic development and the quality of life for all with whom we live and who support our work. We affirm that America's promise extends not only to those who come to the campus but to all our neighbors.

We believe that through this stewardship and through our commitments to access and opportunity and to our students, public colleges and universities effectively and accountably deliver America's promise. In so doing we honor and fulfill the public trust.



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**Seven Challenges to Quality Assurance in U.S. Higher Education and How to Address Them:
A Working Paper for NACIQI**

Peter T. Ewell

I prepared this paper at the request of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) to inform the Committee’s deliberations in preparing for the upcoming reauthorization of the Higher Education Opportunity Act (HEOA). The paper is focused principally on the role and scope of regional accrediting organizations, although the roles of the two other members of the “Triad” for assuring higher education quality in the U.S.—states and the federal government—will be affected by some of the proposals made. While I will suggest some significant departures from current practice with respect to regional accreditation, I presume in this paper that regional accreditors will remain principal actors in the quality assurance space for U.S. higher education and that they will retain their current role as gatekeepers for federal funds.

Many of the ideas I advance in the paper build upon proposals made in the report of the American Council for Education (ACE) Task Force on Institutional Accreditation (ACE, 2012) of which I was a member, and NACIQI’s own report to the Secretary of Education on the future of the Triad (NACIQI, 2012). Others were originally advanced in my monograph prepared for the Tenth Anniversary Commission of the Council for Higher Education Accreditation (Ewell, 2008). A few are new and have not been published previously, though I believe the accomplishment of all of them is plausible with the right combination of opportunity and political will.

The substance of the paper’s argument is structured around seven challenges to regional accreditation and steps that could be taken to address these challenges. I adopt a planning horizon for these proposals of at least ten years because some of them will require changes in federal law and regulation, and virtually all of them will require changes in standards and review processes adopted voluntarily by accreditors themselves. And the latter will likely be incremental, if they occur at all.

Cutting across all seven challenges are three themes that constitute a set of desired future characteristics of any system of quality assurance. These themes are:

- A Focus on Results. Proposals here are designed to more fully focus accreditation standards and associated review processes on institutional quality and effectiveness, with a particular emphasis on student learning outcomes. Regional accrediting organizations have made major strides in this direction in recent years, but many of the institutional characteristics they examine are not directly related to performance. In part, this is because federal directives—many of them embodied in NACIQI recognition—compel accreditors to act as inspectors of relatively narrow areas of institutional practice. This is a not role that accreditors are well equipped to perform and which distracts them from the role of assuring academic quality—a role which only they are able to fulfill.
- Consistency. Proposals here are designed to render the actions taken by accreditors and the results of the accreditation process more consistent with one another both across institutional

reviews within their respective regions and, more importantly, across regional commissions. With respect to the former, the large number of institutions that need to be reviewed in some regions and the relatively unscripted nature of the peer review process that lies at the heart of regional accreditation can conspire to produce review outcomes that are of uncertain reliability. The situation with respect to the latter—consistency across accrediting organizations—is even more problematic. Different accreditors construct review standards and processes in different ways and each uses its own language to present them. One of the reasons for the emergence of the Voluntary System of Accountability (VSA) and its cousins in the wake of the Spellings Commission (USDOE, 2006) was the inability of the higher education sector to paint a consistent and comparative picture of higher education performance. The rising popularity of institutional rankings only reinforces this conclusion.

- Transparency. Proposals here are designed to render the accreditation process more understandable to its stakeholders and the broader public. This is arguably the arena in which higher education quality assurance has made the most progress in the U.S. in recent years. All of the regionals have issued more detailed guidance about what institutions should report to the public about their condition and performance, and most have developed (or are developing) mechanisms for publicly reporting the results of reviews beyond simply a statement of accredited status. But transparency is about more than just communication. It includes in addition a commitment to openness with respect to operations—often termed “integrity” in the review standards established by regional accreditors—and a commitment to focusing quality assurance processes on the right things. In this respect, reliability reinforces transparency, as does a clear focus on institutional performance.

The seven challenges are as follows:

1. Governance. This is about how accreditation is organized and who oversees and manages it.
2. Scope. This is about the number and type of institutions handled by each of the regional commissions.
3. Language. This is about the extent to which institutional accreditors use consistent terminology in their review criteria, in describing their review processes, and communicating the results of reviews.
4. Measures. This is about enhancing and standardizing a limited set of quantitative indicators of institutional condition and performance that are assembled and considered in the course of an accreditation review.
5. Peer Review. This is about how the peer review process might be usefully supplemented and disciplined to obtain greater consistency and reliability across institutional accreditation reviews.

6. Balance in Review. This is about the relative scrutiny that the institutional accreditation process places upon institutions with a good track record on the one hand and a track record of troubled condition or performance on the other. The argument is that the former need relatively little attention, while the latter need relatively more.
7. Public Reporting. This is about the extent to which the conduct of accreditation review processes and the results of these processes for specific institutions are made visible to stakeholders and the wider public.

All of these challenges have been mentioned in the many critiques of regional accreditation that have emerged over the last decade (Gillen, Bennett, and Vedder, 2010; Carey, 2010), and some of them have also been included in more balanced treatments of the accreditation process (Gaston, 2014; Astin, 2014). While they are to some extent interdependent, I believe that these challenges are sufficiently separable as arenas for action that progress can be made on each independently. More importantly, I believe that progress on each can be made without impairing accreditation's historic role of stimulating and increasing academic quality improvement—which I believe remains its most important function in quality assurance. And I believe that such progress can be made without imposing a government (federal) solution.

In the sections that follow, I will first block out the underlying problems that underlie each challenge at a moderate level of detail, pointing to references that more fully back up these assertions as needed. I will then describe one or more actions that could be taken by various actors to address the challenge—recognizing again, that these actions may involve a decade-long effort requiring coordinated decisions by multiple actors.

Governance. Institutional accreditation currently operates within a governance environment that is at best loosely-coordinated. “Mainstream” regional accreditation consists of seven independent membership-based accreditation commissions. These seven commissions attempt to work together through the Council on Regional Accrediting Commissions (C-RAC), which is a voluntary association with no permanent staff or facilities. National accrediting organizations comprise seven organizations that accredit career schools and programs and four faith-based accreditors that accredit institutions with religious missions. All of these accreditors are subject to oversight by the U.S. Department of Education (DOE) and are periodically reviewed and recognized as “gatekeepers” through NACIQI. All may also seek voluntary recognition by the Council for Higher Education Accreditation (CHEA), established in 1996, which operates a parallel recognition process. This rather Byzantine structure of governance and coordination evolved incrementally for many understandable reasons (Bloland, 2001, Ewell, 2008). But it makes it extremely difficult for those involved in quality assurance to speak with one voice in matters of policy.

Whether national or regional, all institutional accrediting organizations (and programmatic specialized accreditors, for that matter) are membership organizations. So a second governance problem centers on the difficulties inherent in relying upon a membership organization playing an accountability role

with respect to its members. As soon as accrediting organizations were accorded such a role with the Higher Education Act of 1965, critics began pointing out that such an arrangement involved an inherent conflict of interest (Newman, 1973). One result has been a recurring *leitmotif* of complaint centered on the perception that peer reviewers cannot, by definition, be hard on one another because of the familiar dynamic of “you scratch my back and I’ll scratch yours” (Ewell, 2008, p.77).

What might be done to rationalize governance arrangements for institutional accreditation? One possibility might be to create a new free-standing federally-chartered (but not federally owned) body to oversee and coordinate institutional accreditors. The form of such an organization could be something like the Federal Reserve Board, the Federal Communications Commission, or the Securities and Exchange Commission—funded, all or in part, from federal sources, but with an independent charge and board of directors. This structure also somewhat resembles that of quality assurance organizations in other countries. For example, the Quality Assurance Agency (QAA) of the United Kingdom is established as a quasi-autonomous nongovernmental agency, funded in large measure by the national government, but separately chartered and governed. Similar proposals that rely on a wholly not-for-profit structure for governance in U.S. accreditation have recently been surfaced, such as charging the National Academies (consisting of the National Academies of Science, the National Academy of Engineering, the National Institute of Medicine and the National Research Council) with such a role (Dill, 2014). Creating such an authoritative free-standing nonprofit body to coordinate and oversee regional accreditation was also one of the recommendations of the National Policy Board on Institutional Accreditation (NPB) in the wake of the 1992 amendments to the HEA (Bloland, 2001). This recommendation eventually yielded CHEA, an organization with an altogether different mission and set of activities from what was originally envisioned by the NPB. But whatever alternatives are proposed, the need for strong independent coordination of accreditation remains a central issue for quality assurance and one in which NACIQI should be vitally interested.

Scope. There are currently seven regional accrediting commissions operating in six geographic regions. The regions are not rationally organized and contain radically different numbers of institutions. The North Central region, for example, includes nineteen states, two of which border Mexico and the Western Association embraces just two states as well as a number of Pacific territories. The largest regional accreditor has review responsibility for more than 1300 institutions and the smallest fewer than 200. One only addresses two-year institutions and the rest accredit all kinds of institutions. (An eighth, recently defunct, also only addressed two year institutions.) These differences in scope evolved by happenstance over many years; as the ACE Task Force report put it, “the current regional basis of accreditation is probably not the way America would structure [quality assurance] if starting from scratch (ACE, 2012, p.18).”

This current approach to defining scope has two drawbacks, one perceptual and one practical. The perceptual problem is that this peculiar assignment of review responsibilities geographically and with respect to type of institution is one of many things that currently impede public and stakeholder understanding of what accreditors do. The less apparent practical drawback is that the widely divergent numbers of institutions that each regional accreditor is responsible for reviewing cannot help but affect the level of attention that a given accreditor is able to devote to a given institution. For example, some

regionals send members of staff on every site visit, while others only occasionally do so. And some commissions act as a committee of the whole in making accreditation decisions, while others rely on a decentralized decision making approach.

There has been no shortage of proposed actions to address this situation. Probably the most prominent is to re-constitute the scope of accrediting organizations on the basis of institutional type instead of geographic region. This idea has emerged several times since the Spellings Commission and was a central proposal of the reformed national accrediting structure advanced by the NPB in 1992-93 (Bloland, 2001). On the face of it, it has some merits. Many now argue that in a postsecondary instructional space that increasingly transcends “brick and mortar” institutions, geography has become irrelevant. And there are some types of institutions—major national research universities, community colleges, and certain special-purpose institutions—for which a persuasive argument can be made for such an approach. But as soon as accreditation by type is seriously examined in the light of today’s rapidly changing postsecondary environment, significant difficulties become apparent. Increasing numbers of two-year institutions now grant bachelor’s degrees—a fact that in the WASC region means that they must deal with two different commissions. At the other end of the scale, recent changes in membership in the Association of American Universities (AAU) demonstrate how difficult it is to maintain boundaries based on a fixed set of institutional characteristics (Lederman and Nelson, 2011). The vast majority of institutions in the U.S., moreover, lie somewhere in the middle, where boundaries between institutional types are far more difficult to establish and maintain.

In the light of these conditions, the decision of the ACE Task Force to leave the geographic basis of regional accreditation alone appears wise and, as a member of that body, I certainly supported it on practical grounds. But this does not mean that nothing can change. First, regional scopes have changed in the past for a variety of historical reasons. For example, the North Central region originally encompassed ten states in contrast to its current nineteen and Arkansas began as a state in the Southern accreditation region and passed to the North Central region in the 1920s (Ewell, 2008, p.30). So there is nothing to prevent regional accreditors from voluntarily revising their geographic scopes if persuasive public benefits for doing so are made clear. A second, more promising, avenue is to harness a developing “marketplace” for accreditation for institutions that have a choice of accreditors. For example, a large for-profit distance-education provider recently changed its accreditor from the Higher Learning Commission of the NCA to the WASC Senior Commission. Because of their long and established histories, the respective scopes of institutional accreditors will be hard to change, which is why I support adopting a long-term, incremental, and voluntary perspective. But NACIQI could play a key role in promoting incremental change by re-examining the current scopes of recognized accreditors as they come up for review to promote more rational regional boundaries and to increase competition among accreditors for institutional members.

Language. Although the seven regional accrediting commissions have evolved roughly similar review processes involving established review standards, a self-study or similar document(s) prepared by the institution, one or more site visits by peer reviewers, and an accreditation decision rendered by the commission or delegated review bodies, the language in which they communicate these central components is unique to each organization (Gaston, 2014; Ewell, 2008). For example, statements of the

fundamental expectations that accreditors have established for an institution to be accredited are usually termed “accreditation standards” but are also called “criteria,” “requirements,” or “commitments.” This reflects the fact that these organizations have a long history of independent evolution and have had no compelling imperative to develop a standard terminology. Like scope, this lack of linguistic consistency across accreditors has both perceptual and practical implications. With regard to the former, higher education’s stakeholders find this lack of comparability confusing because it is not clear whether or not different accreditors using different labels are referring to the same institutional characteristics or areas of performance, or something different. At the practical level, meanwhile, lack of a common language means that it is not clear that institutions are being held to equivalent standards of performance across accreditors. They may be, but without definitional clarity, it is hard to tell.

This challenge is particularly apparent in the critical arena of student learning outcomes. All institutional accreditors have established broad lists of proficiencies that the graduates of accredited institutions are supposed to possess. But the language and contents of these statements differs across accreditors, and they are not very precise or well specified in any case.¹ This makes it hard for higher education’s stakeholders to know what a given award actually means with respect to what its recipients actually know or can do. It also provides accreditors themselves with little guidance in what they should be looking for when they examine the quality of student learning.

Possible approaches to addressing this challenge can be pursued at multiple levels. The most basic is for accreditors to establish a common vocabulary for describing some of the most basic aspects of the institutional accreditation process. This should embrace what to call the statements of expectations against which institutions will be reviewed (e.g. “standards”), the document(s) or presentations submitted as evidence that these expectations are met (e.g. “self-study”), statements of what degree recipients should know and be able to do (e.g. “student learning outcomes”), and the actions taken as a result of a review (e.g. “warning”). It is gratifying that progress has been made on the last of these with the recent adoption of common terminology on accreditation actions on the part of C-RAC (C-RAC, 2014). Similar progress to encourage accreditors to agree on terminology on the rest of the list above could be encouraged by NACIQI through its ongoing agency recognition process and, over the long term, in changes to the language of Part H, Section 496, (a) of the HEOA.

At a deeper level, accreditors can be encouraged to voluntarily align the substance of what they examine in the course of a review, especially in the realm of student learning outcomes. Broad guidance is already provided by the HEOA’s Part H, Section 496 (a) (5) (A), which contains the appropriate caveat that institutional missions and distinctions should be taken into account in developing standards of student academic achievement. But paragraph (A) does not mention student learning at all, only such indirect indicators as state licensing examinations, course completion, and job placement. It probably should. Moreover, this is an area in which accreditors are already ahead of the law because they all have their own statements of expected learning outcomes associated with a degree. This is an area of

¹ See the paper on this topic submitted to NACIQI by Clifford Adelman. Adelman identifies wide disparities across accreditors in both the form and substance of learning outcomes statements.

some delicacy and I am emphatically *not* suggesting that a *particular* list of student graduation proficiencies be written into law. But accreditors should be encouraged to map or otherwise justify their own core expectations for institutions with respect to learning outcomes to some kind of external reference point like the Degree Qualifications Profile (DQP)² or the Liberal Education and America's Promise (LEAP) outcomes of the Association of American Colleges and Universities (AAC&U). The former has undergone a good deal of experimentation by institutions including the involvement of four of the seven regional accreditors³ and the latter are frequently voluntarily referenced and used by institutions in the course of their accreditation reviews. In both, institutions are encouraged to add or modify proficiency statements consistent with their mission and student clientele. Adoption of an aligned frame of reference of this kind with respect to student learning is very close to what the regional accreditors already have in substance, if not terminology (Nichols, 2004), and would strengthen the public transparency and credibility of institutional accreditation.

Measures. Institutional accreditors ask for many kinds of evidence in the course of a review including documents, visiting team observations, and quantitative measures of institutional condition and performance. The first two of these cannot, and should not, be prescribed because accreditors need the flexibility to develop lines of evidence based on differing institutional missions and differing issues facing each institution under review. The case for distinctiveness is less clear for quantitative measures of institutional condition and performance such as undergraduate retention/graduation rates and ratios of financial condition that many accreditors require institutions to produce as part of the annual reporting process. While all accreditors require such statistics, they are not defined consistently across accreditors, except for those statistics—like cohort graduation rates for first-time, full-time students—that are already defined by the federal government. The statistics that are included in these annual reports, moreover, are mostly descriptive and few are focused on institutional outcomes or performance.

Lack of consistency across accreditors with respect to quantitative measures has long been a source of complaint by institutions—especially when they have to recalculate commonly used measures to fit the specific definition required by different actors (e.g. accreditors and states). This discontent has resulted in at least two attempts to create a set of standard definitions for the measures used in accreditation. The first was produced in 1985 for the now defunct Council on Postsecondary Accreditation (COPA) and proposed commonly defined measures in four areas—program or institutional descriptors, resources, utilization of resources, and outcomes (Christal and Jones, 1985). The second was published in 2000 and proposed commonly defined measures in the areas of institutional and program descriptors, faculty/staff resources, facilities, equipment and information resources, fiscal resources and activities, admissions, students and enrollments, and outputs (NCHEMS, 2000). So if action were to be taken to align the quantitative measures used in accreditation, there are certainly resources on which to draw.

² Of which I confess to being one of the authors.

³ One, the Western Association of Schools and Colleges (WASC) Senior Commission has actually written the DQP into its 2013 *Handbook of Accreditation* as one way institutions can demonstrate the “Meaning, Quality, and Integrity of the Degree (WASC, 2013, pp.29-30).”

In many ways more important, some institutional accreditors are beginning to require the use of a small set of institutional performance indicators in the institutional review process. For example, the WASC Senior Commission and the Higher Learning Commission (HLC) both require consideration of institutional retention and graduation rates in their newly-adopted institutional review processes. This makes it all the more important that such measures be consistently defined. The specific proposal I am making is that a standard array (“dashboard”) of ten to twelve performance indicators be developed for common use in the accreditation process.⁴ At minimum, these should address retention/completion, graduate placement (in further study and in employment), financial condition and performance, student/faculty ratios or other productivity statistics such as credit hour generation, and investments in equipment and the maintenance of physical plant. Most SHEEOs collect such statistics for public institutions and accreditors should be encouraged to research these and/or collaborate with states in their regions in developing such measures. Several regional accreditors have also developed such indicators and this experience should be harnessed in building commonly defined measures. For example, the WASC Senior Commission has developed several alternative ways of looking at graduation productivity including cohort and ratio-based measures designed to fit the widely differing circumstances of institutions in the Western region. This kind of sensitivity to institutional missions and circumstances should be a required feature of such measures, consistent with the recommendations of both the ACE Task Force and the NACIQI reports.

Peer Review.⁵ The process of peer review is central to accreditation as it is currently practiced in the U.S. and there are many reasons why this should remain the case. The strongest case for review by peers is that they can bring to bear considerable expertise, drawn from experience, about what a “high quality” institution of higher education ought to look like. When the array of institutions under review was fairly homogeneous—as it was until the 1980s—this was a powerful argument. A related argument is that peer review provides a visible embodiment of the assumption of collective responsibility for self-governance owed by any profession that serves society. An approach based on peer review is also fairly cheap, at least with respect to direct cost. The bulk of the time invested by peer reviewers is contributed service as the regionals pay reviewers only nominal sums to undertake substantial commitments examining materials and visiting campuses. Alternative quality assurance systems based on professional reviewers, as are typical in other countries, must invest heavily in personnel costs and the costs associated with the development of a review infrastructures.

Though arguably well suited to an age when U.S. higher education was smaller and more homogeneous, at least two changes in the environment within which it must operate pose escalating challenges to accreditation’s heavy dependence on peer review. The first is technical: judging the quality of colleges and universities appropriately today requires levels of knowledge about important topics that typical peer reviewers do not possess. The second is political: in the age of heightened accountability, a process based on peer review looks like an inherent conflict of interest because those who judge performance are drawn from the community that is being judged. Together, these challenges have

⁴ For example, the Council for the Accreditation of Educator Preparation (CAEP) has established a list of eight annual report measures which play a prominent part in its newly-adopted review process (CAEP, 2013).

⁵ Much of the substance of this section is based on Ewell, 2012.

combined to yield a number of specific drawbacks of peer review that are becoming ever more apparent.

Accrediting organizations do take pains to match the characteristics of peer reviewers with those of the institutions that they will be asked to examine. But colleges and universities have become sufficiently complex organizations that it is difficult to find random members of the academic community who really understand how they function. Lack of technical background and expertise possessed by peer reviewers is even more acute in specific areas of institutional functioning like interpreting and acting on disaggregated graduation and retention data or evidence about the achievement of student learning outcomes. As these topics become ever more prominent in accreditation, accreditors are struggling to find peer reviewers in their regions with the requisite background to examine them.

Part of the reason for this condition is that peer reviewers in U.S. accreditation receive relatively little dedicated training on how to conduct a review compared to the reviewers and auditors who staff quality assurance processes in other countries. Although this is beginning to change, most visiting team members only attend a day-long (or even half a day) orientation session before being deployed for review. This contrasts with the multi-day (and occasionally as long as a week) training regimens experienced by quality auditors in Europe or Australasia.

Some observers have claimed that peer review's significant deficiencies render it unsuitable as a quality assurance tool. But I believe that dropping it would go too far because, done well, peer review has much to contribute to both the practice of accreditation and the public perceptions of professional self-regulation on which widespread trust in the academy depend. Instead, calling on institutions and accrediting organizations to take specific steps to improve the peer review process—to “discipline” it, if you will—might help alleviate its most prominent deficiencies. The first of these steps would be to increase training opportunities for peer reviewers to make them more intentionally focused on actively simulating common review techniques like directed interviewing and participant observation, as well as examining typical documents like strategic plans, committee minutes, and assessment reports. The second step would be to carefully examine what peer reviewers are good at and what they are not, with an eye toward off-loading the latter topics to expert panels (this is already done in the area of fiscal condition for some accreditors, while others are creating such panels on retention/graduation). A third step might be directed at increasing staff presence in on-site reviews to ensure that team deliberations are focused on the right issues and to provide on-site technical assistance. A fourth step might be to increase the array of tools that a review team can employ to collect evidence such as audit methodologies, mini-surveys, and fieldwork protocols based on techniques used in anthropology or sociology.

In sum, peer review as a central feature of institutional accreditation in the U.S. has vociferous supporters and critics. My own view is in between. Peer reviewers are good at some things and not very good at others. Accreditors, with advice from NACIQI, should leave such processes undisturbed in the former and look for promising “professional” alternatives in the latter.

Balance in Review. In the name of “equity,” the current institutional accreditation process treats all institutions the same. This means that sound institutions with a good track record that would undoubtedly be reaffirmed are subject to unnecessary scrutiny, while institutions that have substantial deficiencies apparent to both accreditors and the public are not given sufficient attention. The alternative is for accreditors to adopt what has been termed a “risk sensitive” approach to review (ACE, 2012). Under this approach, accreditors would determine the level of scrutiny applied in institutional reviews on the basis of the past track record of the institution to be reviewed with respect to quality issues as indicated by previous problem-free interactions with accreditors (and other quality assurance players like states and the USDOE), a history of financial stability, minimal levels of student complaints, and other relevant factors. Such a determination could be powerfully enhanced by an institution’s performance on the set of standard “dashboard” indicators of institutional condition and performance that I described earlier. Quality Assurance organizations in other jurisdictions have adopted such an approach. For example, the QAA in the UK is considering such an approach using past performance data to assign institutions to three levels of “confidence” which experience different levels of scrutiny. This was preceded by an approach in under which the QAA applied a “light touch” to elite institutions whose academic quality was already signaled through multiple external markers. The Australian Tertiary Education Quality and Standards Agency (TEQSA) adopted such an approach in 2013, although it is not yet operating.

There is much to recommend moving forward in this way. It could certainly render the accreditation process more efficient because “low risk” institutions would not have to engage in unnecessary compliance exercises which consume staff time and distract attention from the kinds of self-improvement activities from which they really can benefit. But care must be taken to ensure that high-end institutions do not use a “light touch” approach to avoid important issues that *nobody* does very well, like the assessment of student learning.

The principal drawback of adopting this course of action—of considerable relevance to NACIQI—is that it may not be allowed under current regulation. As the ACE Task Force report points out, the USDOE has detailed “Guidelines for Reviewing/Preparing Petitions and Compliance Reports” which may not allow differentiated review and, while supporting the idea of moving forward with such an approach, the Task Force recommends that legislative clarification be sought on the ability of accreditors to pursue such a course of action (ACE, 2012, p.24). NACIQI is in an excellent position to call for such a determination.

Public Reporting. Until recently, accreditors did not provide much information on the results of institutional reviews other than whether or not the institution under review maintained its accredited status (CHEA, 2005). But much of this has changed in recent years because many institutional accreditors are making the results of reviews more publicly accessible. Yet transparency remains a challenge for a variety of reasons. One is the general public perception that accreditation is a somewhat shadowy and secretive activity that only academic insiders can participate in. A second more legitimate concern is that confidentiality is important to the accreditation process because it encourages institutions to honestly report their shortcomings. Were all of the results of a review—including negative findings—disclosed to the public, institutions might be very much inclined to conceal their weaknesses.

A number of mechanisms can be used to further extend public reporting. The first is for the accreditor itself to develop a short public report that provides information about the results of each review in terms of its findings. This can be organized in terms of specific findings associated with each accreditation standard or, more preferably, in the form of a list of institutional strengths and areas of concern. Several regional accreditors have already taken this approach. The second approach is to require institutions themselves to post accreditation results on their websites. In addition, most regional accreditors are requiring institutions to disclose other information relevant to the accreditation process such as financial information, cost of attendance, retention/graduation statistics, graduate or job placement information, and learning outcomes statements, together with associated performance on student learning assessments. These developments reinforce the conclusion that this seventh and last challenge is already being attended to and that accreditors can voluntarily adopt new approaches when the need to do so is clear.

Some Broad Conclusions. I am keenly aware that the approaches I propose in this paper will be difficult to execute because they represent significant changes from current practice. Academic institutions—among them accrediting organizations—can be deeply conservative institutions and, in for many reasons, they should be so. This is why I advocate adopting a long time horizon and emphasize voluntary action on the part of accreditors themselves to move in desired directions. Substantial progress on the transparency front has occurred voluntarily in just the last couple of years and the very recent C-RAC proposal to adopt common language on accreditation actions is very encouraging. Accreditors have taken these actions because they have been persuaded that they are in their own best interest given the criticism which they may face for not taking them.

So what should NACIQI do under these circumstances? In the ultimate, NACIQI will be called upon to make recommendations for the reauthorization process. Several of the proposals I make in this paper might be considered here, the most important of which are the use of common language to describe key accreditation terms and potential changes to quality assurance governance arrangements. In the near term, NACIQI will be reviewing a number of regional accrediting organizations for recognition and can use the opportunity to gently raise questions about whether they might consider some of the changes I (and others) recommend to align practices and develop common indicators. All of these are areas in which progress is possible and accreditors and the Department can work together.

Our non-governmental, distributed system of quality assurance based on the Triad remains, in my view, the right way to proceed—and other countries would very much like to have a system that resembles it. But it needs thorough review and overhaul in the period leading up to and following the next reauthorization.

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Paper: Important considerations in advancing quality assurance in higher education and recommendations for changes to the Higher Education Act (HEA).

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The purpose of this paper is to articulate the issues that are critical to advance quality assurance in higher education through the Reauthorization of the Higher Education Act. I will focus my remarks on the important role of the programmatic accreditors in advancing quality assurance within the professions. Programmatic accreditors play a critical role in ensuring the health and safety of the public by defining standards that require students to demonstrate competence for entry to licensed or certified practice.

There is no question that this a challenging time for programmatic accreditors. The accreditation system has been subject to increased scrutiny and criticism. While most of the criticism is directed toward institutional accreditation, the programmatic accreditors have also been burdened with increased levels of federal oversight through the recognition process. At the same time, our agencies are experiencing a steady growth in programs seeking accreditation. Our accredited programs do not exhibit many of the problems that the criticism targets and continue to demonstrate high graduation, certification, and employment rates. They attract students from around the world that recognize the United States programs as the “gold standard” in their respective fields. In addition, professional organizations and educational programs in foreign countries frequently adopt our accreditation processes and seek accreditation by U.S. agencies. The strength of our system lies in a number of important principles that are supported through the current federal statutes and should be protected through the next reauthorization process.

These key principles include:

- 1.) Independence of institutions of higher education, accrediting organizations, the federal government, and state government: It is this independence and the working relationship between each of these stakeholders that is the strength of our model. Under the current law, the relationships among these entities and the responsibilities these entities have to each other and to ensuring quality education are structured to retain their independence.

- 2.) Protection in the statutes of the primacy of the accrediting agency with regard to standards setting, decisions about the accredited status of programs, and operational autonomy.
- 3.) The statutes define the relationship between accrediting agencies and the Secretary: the Secretary and any regulations promulgated must assure respect for the decisions of institutions and accreditors in academic matters, and that the Secretary's recognition process is not to be a means for regulating or otherwise intervening in these decisions. Thus, academic decisions must remain the responsibility of the academic institutions and accreditors: there must be respect for and commitment to maintaining the authority of the agencies.
- 4.) Procedural fairness in the recognition process is required for purposes of trust, consistency, and effectiveness.
- 5.) Reviews are to be conducted and judgments made according to published standards, criteria, and procedures.
- 6.) Differences in institutional purposes, missions, goals, and methods of teaching and evaluation are to be respected and valued.
- 7.) Differences in disciplines and professions inform a variety of structures and approaches to higher education and must be respected and valued through the accreditation process.
- 8.) The peer review process must acknowledge expertise in content and ensure reviews are conducted by experts in the specific discipline
- 9.) Appropriate confidentiality is essential to the effective functioning of accreditation. This allows for open and honest communication between the accrediting body and the program/institution being accredited.

Continuing to respect and fulfill the requirements of these principles is essential to the success of higher education institutions and programmatic accreditors to ensure an entry-level workforce of competent and qualified professionals. Protection of stakeholders remains the primary concern to the programmatic accreditors and for good reason. These stakeholders include our potential and current students, graduates, programs, consumers of our graduates' services, payers, and state and federal governments. Problems occur when the recognition process imposes prescriptive criteria that violate the principles cited above. It is my contention that the stakeholders can be

protected without regulations and criteria being overly prescriptive. The concept of setting standards and regulations for such important areas as “learning outcomes”, “student achievement measures” and “program quality measures” is a good example. The recognition process continues to push for regulations to establish set metrics and definitions for each of these measures to be applied consistently in all settings; this causes concern for independence and for quality.

Determination of the quality of a professional education program is more complex than what can be demonstrated by a single set of easily measurable quantitative indicators applied across all programs for all disciplines. A good example is the proposal that would require earnings of recent graduates as a measure of program quality. A program housed in an institution with a mission to prepare graduates to work in underserved inner urban communities and address critical issues such as mental health needs would have graduates with lower earnings. Meanwhile a regional program located in a western state enjoying an economic boost from the oil industry may have graduates with exceptionally high earnings. Failing to take factors such as location and mission of the program skews measures of student achievement. In addition, it could lead to changes in mission and practices in institutions currently benefiting their communities and the nation.

Even an outcome measure as simple as employment rates can be problematic if the regulation becomes prescriptive and fails to account for context of the institution. For example, a number of proponents of prescriptive regulations have argued that only graduates employed in the professional job classification of the program should be counted. In this case, a program my agency accredits could potentially fail this metric; many of their graduates in the last two years have gained employment in a different job classification within an area of need (i.e., long-term care facilities). Their associate’s degree qualified them for the position even though it is not in the job class and they are meeting a recognized need in their community, yet the program would rate lower on this measure of “student achievement” than peer institutions in other communities.

Prescriptive regulation also runs the very real risk of limiting innovation. Programmatic accreditors are embracing innovative curriculum delivery, including online courses, prior

learning assessment, and competency-based education as a way to reduce the cost of education and increase access to professional education. Any changes to the Higher Education Act must be careful to maintain the ability of the accreditor to interpret quality of the program and its methods in the context of the practice environment. Each profession recognizes that practice environments are constantly evolving and thus the competencies required for practice must keep pace with these changes. Innovative approaches to higher education delivery enable professions to meet this need. This goal is best achieved by the professions and not through Federal regulation.

In summary, I would ask the members of the Committee when preparing their report for the Secretary to support the protection of these basic principles that have served as the foundation for what is right about recognition and accreditation. I recognize that this will be a challenge. My concern is that the first response to any perceived or real “crisis” in higher education is to call for increased regulation. While the authors of these changes have the best intentions, many of these regulations may lead to unforeseen consequences that violate the basic tenets underpinning the strengths of the U.S. higher education system.



May 22, 2014

Dr. Susan D. Phillips
Chairperson
National Advisory Committee on Institutional Quality and Integrity
U.S. Department of Education
Washington, D.C.

Dear Dr. Phillips:

Thank you for providing me with the opportunity to serve as a resource to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) as you develop additional advice to the Secretary regarding accreditation policy.

As you mentioned, I appeared before the Committee in February 2011 to share the views of the National Association of Independent Colleges and Universities (NAICU) for the Committee's consideration in developing its initial recommendations to the Secretary. I noted at the time that NAICU supports a strong accreditation system—as its effective operation is essential to maintaining both the quality and the diversity of American higher education. We continue to hold that view and are committed to efforts to assure the continued success of the system.

The attached document addresses the question you posed --“What issues are critical to consider in advancing quality assurance in higher education, going forward?” As noted, quality assurance is best advanced through robust peer review. The clearest view of what works best about that process—and why—comes from college presidents and other campus officials who are directly engaged in this work. I staff the work of the NAICU Board Committee on Accountability, which routinely discusses accreditation issues at its regular meetings in April and November. If you would find it helpful to speak with members of the committee or other independent college presidents about accreditation issues, I would be happy to help facilitate that.

Again, thanks for reaching out on this vitally important topic.

Best,

A handwritten signature in black ink that reads "Susan K. Hattan". The signature is written in a cursive, flowing style.

Susan K. Hattan
Senior Consultant, NAICU

Enclosure



**Statement on Accreditation
To the
National Advisory Committee on Institutional Quality and Integrity
By
Muriel A. Howard, Ph.D.
President, American Association of State Colleges & Universities**

Thank you for the opportunity to submit my comments on accreditation. I hope they will be useful to the National Advisory Committee on Institutional Quality and Integrity as it reviews and deliberates this issue of national importance.

The historic role of accreditation

The American system of accreditation was created as a non-governmental, collaborative, peer system of accountability. It was designed to assure a minimum level of quality and to encourage institutional self-improvement. Its focus rightfully should be on accountability, transparency, and consumer protection.

American accreditation also resembles the nation's historic dispersion of political power, reflecting core ideals of federalism and individual autonomy. Accreditation serves as one part of a three-legged stool- accreditation, state government, and federal government. Accreditation determines that the institution meets minimum standards of quality, the state government sanctions its ability to operate, and the federal government determines whether the institution is eligible to receive federal funds.

While accreditation serves to ensure a level of quality education at an institution of higher education, it is not attempting to distinguish or define the quality. Accreditation serves to determine that the elements for delivering a quality education are in place at an institution. It does not distinguish whether the education at one institution, such as Southeast Missouri State University, is of better or lesser quality than the education offered at another university such as Northern Kentucky University or CSU Northridge.

I am very proud of the role that AASCU and its sister organization APLU have played in facilitating accountability, transparency, and consumer protection among our own institutions with the development of the Voluntary System of Accountability, which now involves 326 public institutions. Accreditors can and should rely on institutionally-determined and

implemented outcomes measures to evaluate quality assurance and improvement at the institution.

I believe that the system of accreditation that we have created over the years has in the main done an excellent job of assuring quality while preserving diversity and creativity. However, this series of hearings reflects the need for all of us to consider accreditation in the rapidly changing context of the 21st century.

AASCU believes:

1. The voluntary system of accreditation is substantially better than a process designed and carried out by a governmental agency.

Our belief in the need to preserve a non-governmental system doesn't grow out of a defensive, self-protective reaction but instead emerges from a careful study of accountability systems around the world. Most countries employ a government-organized system of accreditation. Most of those systems promote uniformity and adherence to a single set of standards, while repressing innovation and new models.

2. Having said that, however, the American system needs to develop some new approaches to address areas of current concern.

The historic process of accreditation has focused largely on inputs. I believe that we must focus substantially greater attention on outcomes. In particular, I believe that we must pay greater attention to learning outcomes for our students. Those outcomes must be broad, not narrow. How well are institutions preparing students for work in a global economy? How well are institutions preparing students for living in a diverse, multicultural world? How well are institutions preparing students to become informed and engaged citizens in our great democracy? How well are institutions preparing graduates to think critically and analyze thoughtfully? The accrediting community, to its credit, began to address learning outcomes, beginning in the mid- 1980s. But that focus on learning outcomes, for far too long, was toothless. The focus on learning outcomes must be accelerated and substantially improved.

A second concern is cost. The cost in both financial and human resources is enormous. Are there ways that cost could be reduced without jeopardy to the accreditation process?

A third concern involves the practice of purchasing an institution and simultaneously accreditation, even though the faculty, curriculum, and mission of the institution is substantially changed or eliminated.

A fourth concern involves developing better mechanisms to account for rapid changes in delivery systems, program design, and instructional practices. Technology continues to alter the ways that institutions carry out their basic educational purposes. We need to ensure that accreditation processes are as nimble as the rapidly-changing educational landscape it monitors. Some regional accreditors, to their credit, have created processes (Academic Quality

Improvement Project [AQIP] and Quality Enhancement Plan [QEPJ) to allow institutions to focus on new approaches but more such development is needed.

A fifth concern is that the current process allows groups of institutions to gather together for self-accreditation. There is always a tension in the self-regulatory process between high community standards and self-interest. Usually, self-interest is addressed by having the community diverse enough that any single institution's self-interest is subsumed by the community's collective interest. But if a select group of institutions, all similar in their self-interest, are allowed to become their own accreditors, the self-interest of individual institutions becomes paramount. That should not be allowed to happen.

3. The accreditation process should not be confused with the Department of Education's responsibility to determine institutional Title IV eligibility.

The federal government now invests more than \$150 billion in financial aid programs. It is appropriate that the federal government wants to have some accountability for that vast annual expenditure. And it is also appropriate that accreditation be used as one measure of eligibility for receiving federal funds. At times, the federal government has placed requirements on accreditors to ensure that taxpayer's interests are best served. Some of these requirements make sense and they are usually reviewed through a traditional accreditation process.

However, many of these requirements are legislative mandates on the Department that have been inappropriately transferred to the responsibility of the accreditors. The Department needs to move away from its reliance on accreditors as enforcers. Perhaps a model can be put in place in which accreditors merely inform the Department of their decisions, whereafter the Department engages the institution before making a decision regarding Title IV aid. The Department of Education's reliance on accreditors for enforcement has led to a diffusion of the appropriate role for institutional accreditors and has fostered an environment where the Department does not do an adequate job of enforcing its own rules.

The diversity of accreditors has diffused, rather than focused, appropriate federal concern about accreditation. There are regional, national, program and career-specific accreditors. NACIQI should focus its attention on recognition of institutional accreditors as part of the Title IV eligibility considerations and should question whether regional and national institutional accreditors should be treated differently. AASCU recommends exploration of the concept of a "tiered or developmental" approach to accreditor recognition as well as disseminating the best practices of those agencies known to be historically stable and clearly in compliance with all government recognition criteria. We think NACIQI should choose to leave program and career-specific accreditation issues to the states. .

Accreditors need to shift the focus of their accreditation reviews from process and input specific criteria to a greater concern about student and learning outcomes. They need to consider institutional reports of learning outcomes such as those to be reported as part of the Voluntary System of Accountability. Institutional accreditors, not the federal government nor the individual institutions, should establish minimum standards for student and learning outcomes and should recognize institutional achievements beyond meeting those minimum standards.

If the focus does shift from over-reliance on input standards, then Department of Education regulations also need to shift, because they too are overly process and input specific. The Department will need to relax its expectations of accreditor enforcement of its requirements and rely on its own resources for enforcement. It is appropriate for accreditors to assist the Department with the protection of the taxpayer in the vein of serving the public interest, but only on those levels that are appropriate to the quality of education and an institution's ability to offer that education.

One of the initial purposes of accreditation was to help ensure confidence in the quality of an institution's offerings; the accreditor's role for providing consumer information should be expanded to meet new and changing demands from consumers for reliable and relevant information about the quality and outcomes of the academic offerings of institutions. The quickly evolving state databases that share common elements for accountability should be considered as a source of such information that might readily be incorporated into an institution's pre-accreditation visit self-study. We also believe this means an increasing reliance upon and distribution of consumer useful data following an accreditation review.

Finally, AASCU challenges NACIQI to set a goal of having the public, states, congress, parents and students better understand the accreditation process and its necessity. The goal should be aimed at helping them know what it is and what it does for students, institutions and the public .



June 4, 2014

The Value of Collective Action for Quality Assurance

Background paper for the National Advisory Committee on Institutional Quality and Integrity

Submitted by:

Christine M Keller, PhD

Executive Director, Voluntary System of Accountability & Student Achievement Measure

Associate Vice President, Academic Affairs

Association of Public & Land-grant Universities

Over the past decade, the public demand for a postsecondary degree has risen and the federal investment in higher education has grown. A significant part of state and federal policy agendas include demands for greater institutional accountability through more comparable, straightforward, and transparent data on student outcomes. Public universities in particular are under pressure to respond to these demands given their important role in providing broad, affordable access to higher education for a large proportion of the U.S. population. Accreditors also appropriately seek data on which to base their decisions. The 2011 NACIQI Higher Education Act (HEA) recommendation characterized data as “an essential tool in quality assurance.”

While public universities have long-standing commitments to public accountability and transparency, federal and state policy agendas routinely include rigid mandates, multiple reporting definitions, or onerous data collection burdens - all of which raise understandable concerns. Of particular note is the challenge of student learning assessments. Methodologies and systems are struggling to keep pace with increasing external demands for evidence, new educational delivery methods, and shifting student and institutional characteristics.

In response, public universities banded together in collective action to develop voluntary systems with a common set of data to meet the desire for more information, but at the same time preserve the flexibility to appropriately represent the diversity of institutional missions. Such systems include mechanisms that allow for adaptation and modification based on changing information needs, data availability, or the introduction of new tools or resources. The Voluntary System of Accountability (VSA) was created and implemented in 2007 as such a community response and continues to evolve to address changes in the political landscape as well as the information requirements of stakeholders. The VSA is a joint initiative of the Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU).

However, too often accreditors do not recognize the value of these collective actions by universities during the accreditation process. On behalf of APLU and AASCU and our VSA participants, we again urge the committee to support broader recognition within the accreditation process of the contribution of

accountability systems already in place. It is right and proper to cite the high level of commitment by institutions participating in these systems to greater transparency in reporting outcomes and to improving student learning on campus. Active participation in the VSA could be a significant indicator for accreditors to implement expedited review procedures for institutions with a record of stability and successful performance. Moving toward a system of differentiated review is recommended in the 2011 NACIQI report and the 2012 ACE accreditation report, *Assuring Quality in the 21st Century: Self-Regulation in a New Era*.

As evidence of the worth of VSA participation, the remainder of this paper reviews the origins of the VSA, describes its evolution, and highlights the application and extension of its work.

THE ORIGINS OF THE VSA

The VSA was developed during the Bush administration as the Commission on the Future of Higher Education, convened by then-Secretary of Education Margaret Spellings, brought national attention to higher education with its focus on the transparent and public reporting of comparable information, including the measurement and reporting of student learning outcomes.

During that time, there was substantial concern within the higher education community that the federal government would mandate a single, rigid set of data and metrics that must be used by all institutions – regardless of institutional mission or the students served – to demonstrate institutional affordability, quality and accountability. The concern was not unfounded: the limitations of a single set of metrics to measure the broad diversity of U.S. higher education institutions are immense and often at odds with an educational system designed to provide opportunities for all citizens.

The VSA was introduced as a counterweight to the more rigid mandates recommended by the Spellings Commission. The College Portrait launched in 2007 based on the premise of offering straightforward, flexible, comparable information on the undergraduate experience, including the reporting of student learning outcomes. Eighty representatives from 70 public universities led the development of the College Portrait with input from the larger higher education community.

The VSA project was created to meet three primary goals:

- Provide a mechanism for public institutions to demonstrate transparency and accountability
- Provide a streamlined college information tool for students, families, high school counselors, and other consumers
- Support institutions in the measurement and reporting of student learning outcomes through original research and by providing a forum for collaboration and exchange

Now in its seventh year, the VSA remains an important program within the portfolio of APLU and AACSCU - with 275 participating institutions. The three original goals remain a cornerstone of the VSA project, but the project has matured and progressed under the guidance of the VSA Oversight Board. Originally created and supported with funding from the Lumina Foundation, the VSA transitioned to become financially self-sustaining through nominal participant dues in 2010. Traffic to the College Portrait website has steadily grown to over 750,000 visitors and 3 million page views annually

The VSA College Portrait has become integrated into state and system accountability efforts such as those in New York, North Carolina, Missouri, Indiana, Ohio, Pennsylvania, and California. With recent national conversations focusing more sharply on college affordability and value, the VSA has also taken several steps to be more effectively positioned to contribute to and influence national policy discussions.

The value of flexibility within systems is highlighted in examining how the VSA has changed to respond to federal and state policy agendas and the information needs of users and participating institutions. Such knowledge provides insight on the value of voluntary collective action and its effectiveness and challenges.

THE EFFICACY OF THE VSA

As a voluntary, institution-led project the VSA is more agile and able to adjust more rapidly to better meet the needs of its many users – students, families, advisors, policymakers, accreditors, and institutions – than a federally mandated system. This flexibility and willingness to adapt is highlighted in the design and implementation of a signature data element within the VSA – the common reporting of student learning outcomes.

As part of the original VSA requirements, participating institutions were given three options to directly measure and publicly report learning gains (value-added) in critical thinking and written communication by December of 2012: the ACT Collegiate Assessment of Academic Proficiency (CAAP), the Collegiate Learning Assessment (CLA), and the ETS Proficiency Profile (ETS PP).

The measurement and reporting of student learning gains at the institution level using standardized instruments is a subject of intense debate within the higher education community. Strong advocates and research support a range of positions on the appropriateness of instruments, levels, methodologies, and application of results. The creators of the VSA understood the controversial nature of their decisions, but believed the VSA could serve as a vehicle to propel campuses to engage more fully in conversations about the measurement of student learning and the importance of publishing the results in a meaningful way for external stakeholders.

The initial reporting format for student learning outcomes was intentionally designed as a four-year pilot project to allow public universities that had not previously used standard instruments to measure and report student learning gains time to explore and learn how to integrate them into their existing assessment plans. The pilot format also provided the VSA a discrete timeframe within which to judge the pilot's success and the potential to make necessary changes.

The VSA began formally gathering information from participating institutions and key stakeholders on the efficacy of the pilot project in spring 2011 in order to evaluate the next steps for student learning outcomes reporting as well as the VSA project and College Portrait overall. The National Institute for Learning Outcomes Assessment (NILOA) conducted an independent evaluation and provided recommendations. NILOA drew on a variety of data sources for its evaluation, including focus groups, interviews with leaders from the policy arena and regional accreditation agencies, institutional surveys, analyses of results from the VSA-conducted survey of participating institutions, College Portrait database statistics, and Google Analytics.

The evaluation findings indicated that VSA student learning outcomes pilot was an effective response to the challenges that emanated from the Spellings Commission. However, the findings concluded that original learning outcomes reporting options on the College Portrait were insufficient and limited the number of institutions willing to participate in the VSA project. More broadly, the evaluation revealed that using a single format to present the data on the College Portrait to meet the information needs of multiple constituency groups was falling short of its potential impact and utility for users. Despite these challenges, the overall conclusion of the NILOA evaluation was to “mend it, don’t end it” and affirmed the continuing value of the VSA and the College Portrait (Janokowski, et al, 2012).

Expansion of Student Learning Outcomes Reporting

A clear message from the NILOA evaluation and VSA participants was the need to expand the number and nature of student learning measures to more accurately portray student attainment as well as to provide more useful and meaningful information for multiple audiences. The NILOA evaluation stated this position in strong terms, positing that the original value-added administration requirement for the standardized tests of student learning, “lack credibility and acceptance within a broad sweep of the higher education community and serves to undermine institutional participation in the VSA.” (Janokowski, et al, 2012)

Incorporating the advice of a group of measurement and assessment experts, the VSA introduced an expanded set of options for measuring and reporting student learning outcomes results in January 2013. VSA institutions are in the midst of implementing the expanded set of options and reporting – with over 100 VSA institutions already publishing results on their College Portraits.

A significant addition for the VSA was the inclusion of two VALUE rubrics (critical thinking and written communication) from the Association of American Colleges and Universities (AAC&U). The VALUE rubrics were created by faculty and other academic and student affairs professionals and include broadly shared criteria for judging the quality of student work in a particular outcome. The VALUE rubrics offer participating VSA institutions a coursework embedded approach to measuring student learning and offer the potential for bridging the gap between the assessment results needed to guide program improvement on campus and the desire for a common framework for public reporting and accountability.

AAC&U approached the VSA in spring 2014 to determine whether the College Portrait reporting framework for the VALUE rubrics could potentially be used by the institutions using the VALUE rubrics as part of the Multistate Collaborative to Advance Learning Outcomes Assessment (MSC), a collaborative project among the State Higher Education Executive Officers’ association (SHEEO), state systems, and two- and four-year campuses in nine states. The goal of the project is to advance assessment and allow for cross-state comparisons of student learning.

Effective Communication with Target Audiences

The need to better customize and target information on the College Portrait for specific audiences and to educate those audiences on what data are important and why is more challenging than expanding the set of assessment options with a longer timeline to be fully developed and implemented. Nonetheless, there are both short-term and longer-term plans underway to accomplish this goal.

Two immediate changes already implemented provide more user-friendly and detailed information on cost of attendance and financial aid. Analysis of traffic patterns revealed that these web pages are the most visited section of the College Portrait, which is not surprising given concerns about rising college costs and student loan burden. In response to the increased interest, the cost and financial aid page was redesigned to include institutional net price and financial aid by family income range, average indebtedness of graduates who borrow, and an amortization calculation to show the average monthly loan payment of students who graduate with debt.

The opportunity for institutions to use the Success & Progress rate framework to create charts and tables for institutionally-defined groups of students, such as veterans, first-generation students, or Pell recipients was added in fall 2012. The Success & Progress rate reports the progress and graduation of students across multiple institutions and is a more comprehensive alternative to the federal graduation rate.

A redesigned College Portrait website will be launched later this year to provide easy and consistent access from a variety of devices and to better guide specific constituency groups (students, families, advisors, policymakers) to the parts of the College Portrait of potential interest to them. Additional refinements will continue to guide users within a particular group to popular information for that group based on analytics embedded in the site.

In the longer term, plans are underway to position the College Portrait as a more dynamic tool for institutions to use with stakeholders for evidence-based story-telling. For many audiences the full set of College Portrait data is unnecessary and, in fact, can be overwhelming. With this in mind, the College Portrait data is being organized into smaller, bite-sized pieces so users can create fully custom pages or select a pre-designed template on a particular topic or issue. The resulting tool - *College Portrait At A Glance* - will be introduced in 2015 and allow users to create unique snapshots of a College Portrait organized around a central theme or issue in an integrated, graphical format. The custom *At A Glance* pages can be saved as PDFs or links so users can link their page from a websites, email them to important decision-makers, or use them as handouts.

The *At A Glance* tool could be used by campus government relations staff describing student outcomes to a state legislator; public affairs staff offering examples about the student experiences on campus; presidents demonstrating to governing boards the progress and success of their students; and advisors explaining college costs and financial aid to students. The goal is to provide more value and flexibility for VSA participants by creating a means to tailor the right set of College Portrait data for a given audience and issue.

LESSONS FOR TRANSPARENCY AND ACCOUNTABILITY

Overall, the VSA has reinforced the importance of publicly reporting meaningful and accurate data for consumers to help make informed decisions, for policymakers in fairly evaluating institutional performance, and for institutions to support evaluation and improvement. The current federal policy conversations surrounding the Postsecondary Institution Ratings System (PIRS) proposal share many similarities with the experiences with the Spelling's Commission in 2006. Institutions again face the prospect of a federally mandated accountability effort that potentially undervalues the diversity of both the institutions and students within the U.S. higher education system. The VSA experiences have also

been leveraged and shared by APLU and AASCU within individual association advocacy efforts and as part of collaborative initiatives with other higher education associations. One example – the Student Achievement Measure– is described in the following section.

Student Achievement Measure

The Student Achievement Measure (SAM) is a voluntary, collaborative initiative launched in June 2013 to provide colleges and universities with a tool to report the progress and graduation of significantly more students than the federal graduation rate, which only includes full-time students that start and finish at their first institution. SAM is able to account for the progress and completion of transfer students, part-time students, full-time students, and the outcomes of students who enroll in multiple institutions. The data models within SAM utilize the Success & Progress rate metric from the VSA as well as the Progress and Outcomes metric from the Voluntary Framework of Accountability (VFA), a similar accountability initiative for community colleges sponsored by the American Association of Community Colleges (AACC).

Recognizing the need for broad, cross-sector collective action, SAM is a joint initiative of six presidential higher education associations: APLU, AASCU, AACC, the American Council on Education (ACE), the Association of American Universities (AAU), and the National Association of Independent Colleges and Universities (NAICU). All types of colleges and universities from all 50 states are participating in the project and the SAM website is currently tracking the progress and completion of a half million more students than the federal graduation rate. SAM's potential impact on federal policy is much more powerful as a collective, cross-sector initiative than any one sector could accomplish on its own.

CONCLUSIONS - THE VALUE OF COLLECTIVE, VOLUNTARY ACTION

The VSA College Portrait remains a model for the effectiveness of collective, voluntary action by colleges and universities in responding to demands for increased accountability and transparency from federal policymakers, accreditors, and consumers. The willingness of over 300 public universities to join the VSA and commit to the common measurement and reporting of student learning outcomes helped advance transparency and accountability objectives while staving off a federally mandated reporting requirement from the Spellings Commission.

The VSA championed the importance of measuring student outcomes (rather than inputs) and reporting those outcomes in a common and understandable way to key audiences. It provided a space for experimenting with new tools such as progress/completion metrics and standardized learning outcomes assessments across a large and diverse group of institutions. The student learning outcomes requirement served as a catalyst for campuses to more fully engage in the measurement and reporting of student learning outcomes. The cross-sector Student Achievement Measure is a direct outcome of the foundation built within the VSA to explore alternative graduation metrics through the Success & Progress rate, continuing and expanding the VSA's legacy of responsive, collective, voluntary action.

The premise of collective impact demonstrates that substantially greater progress can be made in addressing the underlying demands for greater accountability and transparency through better coordination rather than from the isolated interventions of individual institutions. The VSA is a significant example of institutions coming together with a common agenda for collective action.

When evaluating the institutional data supporting re-accreditation and the self-study process, we urge NACIQI to explicitly cite voluntary accountability and transparency systems such as the VSA and SAM as valued evidence within the accreditation process. Institutions that proactively participate in such systems provide an excellent example of how institutions can publicly disclose key data to external stakeholders. The efforts of these colleges and universities should be acknowledged and rewarded.

Resources

American Council on Education (2012). *Assuring Academic Quality in the 21st Century: Self-Regulation in a New Era*. Retrieved from <http://www.acenet.edu/news-room/Pages/Assuring-Academic-Quality-in-the-21st-Century.aspx>.

Association of American Colleges and Universities (AAC&U) VALUE rubrics
<http://www.aacu.org/VALUE/rubrics/>

Janokowski, N.A., Ikenberry, S.O., Kinzie, J., Kuh, G.D., Shenoy, G.F. and G. Baker (2012). *Transparency & Accountability: An Evaluation of the VSA College Portrait Pilot*, A Special Report from the National Institute for Learning Outcomes Assessment for the Voluntary System of Accountability. Retrieved from <http://www.learningoutcomeassessment.org/VSA.htm>

National Advisory Committee on Institutional Quality and Integrity (2012). *Higher Education Act Reauthorization Accreditation Policy Recommendations*, Report to the U.S. Secretary of Education. Retrieved from <http://www2.ed.gov/about/bdscomm/list/naciqi-dir/2012-spring/teleconference-2012/naciqi-final-report.pdf>.

National Association of State Budget Officers (Spring 2013). *Improving Postsecondary Education Through the Budget Process: Challenges & Opportunities*. Retrieved from <http://www.nasbo.org/sites/default/files/pdf/Improving%20Postsecondary%20Education%20Through%20the%20Budget%20Process-Challenges%20and%20Opportunities.pdf>

Postsecondary Institution Rating System (PIRS), website <http://www.whitehouse.gov/the-press-office/2013/08/22/fact-sheet-president-s-plan-make-college-more-affordable-better-bargain->

Student Achievement Measure, website www.studentachievementmeasure.org

U.S. Department of Education (2006). *Charting the Future of Higher Education – A Test of Leadership*, Final report from Commission on the Future of Higher Education. Retrieved from <http://www2.ed.gov/about/bdscomm/list/hiedfuture/reports/final-report.pdf>

Voluntary System of Accountability (VSA) College Portrait, website www.collegeportraits.org

What issues are critical to consider in advancing quality assurance in higher education, going forward?

- **Finding ways to maintain the accreditation focus on quality assurance:** “Mission Creep” is becoming a real issue in accreditation. There is a constantly growing list of federal legal requirements that accreditors are expected to see that institutions are meeting. Time that should be spent on quality assurance functions is instead being used to check on an institution’s compliance with federal Title IV requirements. This is a function more appropriately handled by federal officials.
- **Finding ways to maintain the mission-based focus of accreditation:** The reason that a diverse array of higher educational offerings are available in this country is due to the mission-based focus of accreditation. This diversity permits students to find their “best-fit” institutions and maintains the vitality of our system of higher education.
- **Finding ways to avoid falling into a “check-box” focus on compliance:** Accreditation is not about a granular review of institutional compliance with narrow requirements, and review of accreditors should not be either. All too often, a holistic view of an accreditor’s performance is lost in a sea of minor procedural infractions. Reviews seem to be based on the assumption that all accreditors need to score 100% on the exam in order to pass. If there is a provision of statute or regulation that demands this level of compliance, it should be modified.
- **Finding ways to protect candor in the review process:** It is NAICU’s view that general disclosures of accreditation findings will substantially change the nature of the accreditation process and undermine the frankness and candor that help make the process successful.
- **Finding ways to increase public understanding of what accreditation does and how institutions demonstrate their quality:** Accreditation is not well understood by the public or policymakers, and taking steps such as disclosing more accreditation reports is unlikely to change the situation. Accreditation can be difficult to explain, but efforts should continue to find creative ways to do so. Likewise, institutions should be encouraged to share key quantitative and qualitative information about themselves in an accessible, easy-to-use format.

Issues Critical in Advancing Quality Assurance in American Higher Education

Authors: David Longanecker, Demaree Michelau

We appreciate the invitation to share our perspective on the issues critical in advancing quality assurance in the changing environment of American higher education, with a specific focus on the federal government's interest in this subject.

We begin with an admonition. Quality assurance is not a desired goal; quality is. Quality assurance is simply a means to the end, not an end in itself. Sometimes, however, those of us who have a passion for assuring quality can get consumed in the process, forgetting that the focus should be on the desired result, and that the proof of the pudding will be whether we achieve a quality outcome, not whether we measure that outcome well.

Having said that quality is the goal, not quality assurance, we won't know whether we are providing quality education without strong quality assurance processes. And strong quality assurance requires both knowing whether we have achieved quality and, if so, at what level. This paper presents three basic principles of strong quality assurance and tests the current quality assurance system for American higher education against these three principles. The three principles are:

- 1. Quality assurance must accurately measure performance, not effort.**
- 2. The results of the quality assurance process must be transparent and actionable.**
- 3. The process for quality assurance must be affordable.**

In American higher education, particularly from the perspective of the federal government, quality assurance is provided through what is commonly known as the quality assurance triad: a combination of accreditation, state authorization, and federal oversight.

In this three way partnership, our world-renowned but often nationally maligned accreditation process has the primary responsibility for assuring that institutions of higher education provide adequate educational programs. While the accreditation process certainly reviews more than just the academic activities of the institution, academics are the heart of the accreditation process and certainly the major focus at the federal level. This process has evolved appreciably over time, but particularly over the past quarter century. Consistent with the evolution of quality assurance in many industries, the accreditation process has shifted in recent years from a process focused almost exclusively on procedural factors to a much greater focus on performance with respect to outcomes. Accreditation, however, be it regional, national, or specialized, has always been challenged by the expectation that it will serve two purposes that

may, on occasion, conflict with each other: the expectation that it is a process for internal institutional self-evaluation to guide improvement and the expectation that it is a process for providing external accountability.

States, the second partner in the quality assurance triad, have the primary responsibility for assuring consumer protection to our students. This process, too, has evolved over time. For most of the history of American higher education, states varied greatly in the extent to which they accepted this responsibility for consumer protection. Many states were quite lax in their oversight of institutions operating within their boundaries. Within these states, public institutions were perceived as needing no more oversight than their “publicness” already exacted from the state legislature, governor, and state coordinating function. Private non-profit institutions were perceived as good actors, serving the public good. For-profit institutions were less prolific in these states, were generally locally owned/operated and considered an asset, not a liability. At the other end of the continuum, a number of states took this responsibility for oversight very seriously, often developing quite rigorous quality assurance oversight processes. While these states seldom if ever provided much oversight of public institutions beyond standard legislative and executive branch oversight, they regulated the remainder of higher education in much the same fashion that they regulated consumer protection for other areas of commerce within their boundaries. In the middle, were many states that seriously accepted responsibility in overseeing this consumer protection responsibility, but were somewhat less regulatory in their oversight responsibilities than were the most rigorous states.

In recent years, however, two major changes in the delivery of higher education have led some states to become much more engaged in this consumer protection responsibility. First came the rapid increase in the share of students attending for-profit institutions, many of which were national in scope with no history of serving the interests of the “states.” Second came the advent of ubiquitous provision of online learning, which created confusion over who was responsible for protecting students; was it the home state of the institution providing the education or the home state of the student receiving the education? As a result of these two changes, almost all states have become much more serious about their regulatory responsibilities in assuring consumer protection for students, and many have begun joining together in reciprocity agreements to assure cost effective, high-quality, collaborative quality assurance.

The federal government is the third partner in this quality assurance process. One of the most unique and significant roles it plays is through its standards of assuring the financial integrity of institutions participating in federal student assistance programs. These federal financial responsibility standards seek to ensure that institutions have sufficient financial wherewithal to support adequate educational endeavors. The federal government also contributes to quality

assurance through its oversight of institutional integrity and compliance with federal program participation requirements. Finally, the federal government enhances the quality assurance process through its oversight of the accreditation community through the National Advisory Committee on Institutional Quality and Integrity (NACIQI).

So, how well does this quality assurance triad work in addressing the three principles of quality assurance laid out earlier? And how well is it equipped to respond to a changing higher education environment?

Principle One: Quality Assurance must accurately measure performance, not effort.

The efficacy of the quality assurance triad in measuring performance, not effort, is a very mixed bag.

Accreditation, which is the primary tool for measuring academic quality, continues to face issues with both content and face validity in its measurement of educational quality. With respect to content validity, accreditation faces three issues. First, it remains too focused on process (effort), rather than desired outcomes (performance) as the appropriate measure of quality. While measures of desired outcomes such as student learning have been introduced into the accreditation process, the bulk of the process remains focused on procedural factors. Virtually every corrective action recommended in accreditation deals with process factors such as governance, finances, curriculum, academic support, or student support; not with student learning or other outcomes. And, even though consideration of student learning outcomes are now required by virtually all accrediting bodies, the metrics used to measure student learning are not required to be externally validated nor are explicit achievements in student learning required of the institutions being accredited.

Second, the pass/fail nature of accreditation, with virtually all institutions “passing” provides little evidence of the relative success or lack thereof of institutions.

Third, the nature of the accreditation teams, composed almost entirely of people from within the academy and of people with relatively modest training for conducting the accreditation visits, raises issues of both the adequacy and potential conflict of interest in the reviews.

With respect to external face validity, accreditation faces two quite contradictory dilemmas. On the one hand, for some consumers of accreditation – prospective students, their families, businesses hiring college graduates, and some states – accreditation is perceived as the “gold seal of approval” and connotes a level of institutional quality that simply may not be legitimate. On the other hand, for some other consumers of accreditation – many state and federal governmental bodies, businesses looking for true measures of quality, discerning prospective students and their families, and often critics within higher education – knowledge of the issues

around content validity and the lack of transparency raise issues about the efficacy of accreditation as a legitimate form of quality assurance.

State authorization of distance education also lacks some of the tenants of strong quality assurance. By necessity, the initial approval of institutions to operate within a state is generally based solely on whether the institution has the appropriate processes in place to provide adequate educational services; this is necessary because initially there is no evidence of performance. This is not true of institutions that are expanding their educational operations from one state to another, nor is it true for institutions seeking continued authorization, and indeed an increasing number of states have begun looking at factors such as graduation rates, student loan default rates, and records of consumer complaints when evaluating institutions that have a record on which to judge performance. With more students attending for-profit institutions and more students engaged in online education in some form, there is increased pressure on higher education to strengthen quality assurance when institutions operate across state lines. As an example, the recently-created State Authorization Reciprocity Agreement, or SARA, requires evidence of reasonable performance for institutions in participating states to receive and retain approval to operate across state boundaries, at least with respect to online learning offerings. A strength of the state authorization reciprocity process is the requirement that states provide rigorous and transparent consumer complaint processes, which provides some direct evidence of whether institutions are providing quality service, at least from the perspective of the students they serve.

Federal quality assurance processes also represent a mixed bag with respect to actual measurement of performance. The financial responsibility requirements reflect the dubious presumption that institutions with sufficient resources will provide adequate services. Other federal activities, including institutional audits and reviews and the oversight of NACIQI, reflect ex-post-facto reviews of institutional quality, with NACIQI's standards reflecting some of the same limitations reflected earlier with respect to accreditation.

In sum, taken separately the three parts of the triad don't measure up particularly well in measuring quality outcomes, though when considered together they provide much better coverage of this principle than any of the three does independently.

One of the clear dilemmas with the quality assurance triad, however, is that the unit of analysis with regard to quality is universally the institution of higher education, yet innovation in American higher education is driving great reform in the delivery of higher education at the sub-institutional level – at the module, course, program, and competency level. None of the three partners in the triad capture well today any quality assurance mechanisms for these new innovative approaches to delivering higher education.

Principle Two: The results of the quality assurance process must be transparent and actionable.

In addition to the issues surrounding validity is concern about the lack of transparency in accreditation. A strong quality assurance system helps consumers understand both the assessment process and the results thereof. Both state authorization and federal oversight meet this standard pretty well. Accreditation, however, doesn't. Modern accreditation is an essentially private process, with the final determination of whether to grant accreditation made public, but none of the individual findings within the accreditation review made public unless an institution chooses to make such results public. This lack of transparency of the results of the process creates at least three dilemmas.

First, it makes suspect the efficacy of the process. In the past, there was, without doubt, much greater trust in processes like accreditation. It was generally accepted that members of the academy were both trustworthy to act with the highest integrity and were the most qualified to judge the quality of academic institutions. With the advent of a stronger focus on public accountability, particularly in public institutions (both educational and otherwise) public policy and public accountability have taken on a much more evidence-based nature, requiring more proof and less trust. The lack of transparency in higher education accreditation not only fails to provide this expected level of evidence, but erodes the traditional level of trust that existed between the public and higher education. If the current process is not made more transparent, it is quite likely that states, the federal government, or other consumers of higher education, such as business and industry, may develop new processes. Indeed, President Obama has indicated that the current process simply doesn't work well enough.

Second, the pass/fail nature of accreditation (with some variations, but not much) fails to meet the test of modern quality assurances schemes. We are all familiar with the Consumer Reports ratings system that provides consumers with an assessment of the quality of products, based on demonstrated performance. Accreditation lacks such useful consumer information. To some extent other new forms of accountability, such as the Voluntary System of Accountability (VSA) and the new Student Achievement Measure (SAM) have begun to provide evidence of "differences," but in general, American higher education has resisted such efforts, contending that our differences are one of the essential strengths of our efforts. Indeed, when the staff of Western Association of Schools and Colleges (WASC) sought to provide greater transparency and evidence, the institutional members squelched the effort.

Finally, this lack of transparency can provide cover for those institutions that are reluctant to innovate or respond to the changing context of higher education. Too easily, when faced with a challenging problem, a higher education decision maker can maintain the status quo by simply

saying that the accreditors will not allow a certain policy or practice, which can be difficult for others to refute since the process is so unclear.

Principle Three: The process for quality assurance must be affordable.

One of the potential dangers in imagining ways in which quality assurance in American higher education could be improved is that such imagining can lead to the perfect being the enemy of the good. To some extent we are seeing this today in the discussion about how best to assess student learning outcomes, with many assessment gurus suggesting measurement techniques that are either so intensive or so presumptive of an ideal version of the perfect student that they neither recognize the amount that higher education can afford for quality assurance nor the nature of the students we actually serve.

While good quality assurance costs a fair bit to provide, it can be achieved in a fashion that doesn't cost an arm and a leg. Accreditation is no exception. The current self-study approach to accreditation costs institutions quite a bit because of the substantial amount of time and effort required to conduct the self-study. The accrediting community has accommodated this substantial expense by requiring such reviews relatively rarely – generally seven to 10 years. This process not only costs institutions substantial amounts, it is also expensive for the accrediting agencies, which they defray by using volunteer services of members for the peer review teams. The result, however, is a process that relies on a cadre of well-meaning individuals, but with little professional evaluation expertise. So, the dilemma is that accreditation is potentially both too expensive and not expensive enough.

Strong state authorization requires an additional expense for the triad approach to quality assurance. It requires effort at some expense by the institution to prepare for the state approval and reapproval processes. In addition, most states charge an annual fee for institutional approval, and this fee ranges from very modest amounts, even zero in many states to quite substantial fees, as high as \$10,000 annually, in other states. The new state authorization reciprocity program also charges institutional fees ranging from \$2,000 to \$6,000, depending on the size of an institution, though this fee offsets many of the state-by-state fees required of institutions operating from states that don't participate in reciprocity. Institutions generally pay most of the costs of state oversight in this arena. Some states, however, pick up all or a portion of these costs within their general regulatory oversight function.

The federal government picks up the full direct costs of its quality assurance programs within the U.S. Department of Education's administrative budget, but the costs of preparing for federal oversight must be borne by either the institutions or accrediting agencies being reviewed.

The dilemma with respect to the current quality assurance triad, therefore, is that it is both too expensive, but perhaps not expensive enough. The costs of preparing for compliance with the three partners, added to direct fees institutions face, can amount to a substantial expense for this portion of an institution's business. This expense can be particularly onerous for small institutions with limited resources. Yet our efforts to defray these costs through the engagement of volunteer labor and long periods of time between reviews may be undercutting the effectiveness of our quality assurance activities.

Does the sum of the parts equal the desired whole?

In sum, when one examines American higher education's attention to the principles of good quality assurance, we have more of a patchwork of modest efforts rather than a quilt composed of high-quality pieces. It works reasonably well, for an affordable amount, but lacks credibility both because of its lack of sufficient focus on the relative quality levels within higher education and because of the lack of transparency in the results that are measured.

The Solution

So, what is the solution to a system that appears to be validity challenged, non-transparent, and either too expensive or not expensive enough?

The answer is certainly not to abandon what we have for either of the oft mentioned alternatives – either to let market forces prevail and forget about quality assurance (it just gets in the way of innovation, after all) or create a federal quality assurance system (because quality assurance is inherently a government responsibility). Those are silly ideas promoted by either fools or ideologues who think that the rest of us are fools.

Rather, the solution should be to reform the current quality assurance triad to provide a valid, affordable, transparent, and actionable quality assurance system for American higher education.

The states have been actively working to improve state authorization processes over the past five years, and the new state authorization reciprocity agreement addresses virtually all of the concerns that have been raised about the state's role in consumer protection, at least with respect to the delivery of online education across state lines.

The federal government has some work to do in contemporizing its financial integrity examination process and in improving its data systems to allow for evidence-based quality assurance, but both of those tasks are doable.

Clearly the biggest reform task rests with accreditation. With respect to the institutional self-improvement process, we believe it is a pretty good system as is. We are quite impressed with

the changes that the Northwest Commission has adopted, which moves this more to a continuous improvement model, rather than the 10-year plan. Effectively measuring outcomes remains one area that needs more deliberative action. This is true both for student learning and also with respect to other critical missions of the institutions, such as research. These measures need to assure greater externally-validated results, and institutions need to be held to achieving improvement toward their goals. The Western Association of Schools and Colleges has led the regional accreditors on issues around student learning outcomes, and while much more needs to be done in this arena, the accrediting agencies appear to be on the task.

With respect to the public quality assurance process, this portion of accreditation's role in quality assurance should be separated from the self-improvement process, done more frequently (no less than every three years) and be focused on fully transparent metrics that examine critical outcomes, including student learning, completion rates and numbers, and successful transition of former students to the next step in their life. Furthermore, these metrics should provide information that allows external customers of this quality assurance process to know the difference between exceptional performing institutions (in comparison to their peers), average performing institutions (in comparison to their peers), below average but acceptable performing institutions (in comparison to their peers), and abysmal performing institutions.

In sum, the dilemma with modern accreditation is that it isn't modern. The solution is not to abandon it but to change it into a contemporary approach to quality assurance. We can do this. We already do it within our community for non-core activities like athletics; surely we can do it for our core business.



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May 23, 2014

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National Advisory Committee on Institutional Quality and Integrity
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Distinguished Committee Members:

The Accrediting Commission of Career Schools and Colleges (ACCSC) appreciates the opportunity to continue to participate in the dialogue with the National Advisory Committee on Institutional Quality and Integrity (NACIQI) as the Committee continues with its agenda to advise the Secretary of Education on accreditation policy and considers making recommendations for changes to the Higher Education Act (HEA). The question put forth in your invitation is “What issues are critical to consider in advancing quality assurance in higher education, going forward?”

In considering the *Higher Education Accreditation Reauthorization Policy Recommendations* advanced by NACIQI in 2012, many of the positions taken by NACIQI align with ACCSC’s views, including:

- The accreditation system serves as a critical element in providing information about academic quality to satisfy the federal interest in assuring the appropriate use of federal funds;
- Accreditors are the most experienced source of information about academic quality and should continue to establish and assure consistency with academic quality standards in the determination of eligibility;
- There is value in sustaining the determination of quality as a non-government function; and most critically,
- Underscoring ACCSC’s alignment with NACIQI in many areas is ACCSC’s fervent belief that American higher education is best served by **retaining accreditation** in the institutional eligibility process for Title IV federal student financial aid programs.

However, ACCSC does recognize that there are areas where improvements can be made for the sake of establishing a better quality assurance network for the many constituents that accreditation serves. Thus, the following are suggestions for NACIQI to consider along these lines.

Macro Areas:

1. **Outcomes:** Outcomes measures are an important part of the assessment paradigm for higher education institutions. But, outcomes measures are not a one-size-fits-all solution and as such one-size-fits all quantitative metrics should not be mandated by Congress or the U.S. Department of Education. Accreditors, working with their accredited institutions, should be required to find and define the right set of measures and metrics to evaluate institutional and student success based upon the primary characteristics of the institutions and type of education delivered. While program-level rates of graduation and employment work well for the types of career, technical and vocational institutions accredited by ACCSC, those same measurements may not be as appropriate in other types of institutions. In some areas a “satisfaction and employability metric” as opposed to an employment

rate could be considered as an indicator of institutional and student success. That is to say, based upon survey information, do graduates and employers believe that the level of education provided by an institution was of an acceptable level of quality and prepared the graduate for the world of work?

Moreover, outcomes measures by themselves are not a panacea and alone cannot provide a sole assessment of the quality of an institution or its programs. Input standards (e.g., faculty, equipment, library, etc.) are an equally important part of the assessment paradigm and serve to illustrate why accreditation is an important part of the higher education regulatory landscape. Generally, outcomes measures should be a reflection of how an institution performs relative to standards (i.e., best practices) and should minimally require institutions to assess learning and competency attainment as well as:

- Rates of retention or graduation;
- Rates of employment and certification/licensure exam pass rates in career and professional programs, and measures related to “employability” in other program areas;
- Measures of student and graduate satisfaction; and
- Measures of employer satisfaction.

These kinds of outcomes taken together with an assessment of an institution’s adherence to input standards provide the tools necessary to assess quality and value. Thus NACIQI should consider making a recommendation to the Secretary that institutions and accreditors be required to establish and enforce the right set of metrics, to show the effectiveness of the metrics, and that the Secretary hold accreditors accountable in this regard as a primary condition of recognition.

- 2. Transparency:** Accreditors should provide useful disclosures of the accreditation actions taken by the agency that can help the general public make informed decisions about an institution or program. ACCSC also believes that enhanced requirements for notification of accreditation actions, information sharing, and disclosures of institutional performance will continue to strengthen accreditation’s partnership in the regulatory triad, and add to the benefits for the general public. At a minimum, ACCSC believes that disclosures required by the HEA should include:
 - **Accreditation Actions:** Grants of accreditation, substantive change approvals (e.g., new program offerings, new branch campuses), probation and adverse actions; and
 - **Institutional Performance:** Student Graduation and Graduate Employment rates for every program offered.
- 3. Transfer-of-Credit:** Accreditors should have and enforce standards that prevent institutions from unfairly or unjustifiably denying credit transfer, particularly when the reason for denying credit is the “source” of accreditation (e.g., national accreditation). The fact that an institution is not “regionally” accredited is often used to deny the credits earned by graduates from that institution. Federal regulations under **34 CFR §602.1- §602.38** demand that recognized accrediting agencies’ standards, whether it be regional or national, be sufficiently rigorous to assure that high standards of educational quality and institutional integrity are maintained. In this sense, there is no distinction between a regional accrediting agency and a nationally recognized accrediting agency – all agencies are held to the same rigorous process and criteria. Thus, there is no basis for making distinctions on the antiquated notions of “regional” or “national” accreditation. When the source of accreditation (national vs. regional) is the sole determinant in transfer-of-credit decisions, it typically relies upon arbitrary assumptions and does not give students or non-regionally accredited institutions an opportunity to demonstrate equivalency of coursework. The Higher Education Act should once and

for all end the unfair practice of denying credit on the sole basis of an institution's source of accreditation. If an institution wishes to participate in the Title IV Student Federal Financial Aid Program, then that institution should have an open, fair, and consistently applied practice of assessing credit for the purpose of determining transferability.

4. **Credit Hour Definition and Clock Hour Conversions:** Seat-time requirements for funding programs neither preserve academic integrity nor do they promote competency assessment and as such the federal definition of a credit hour and the complex clock-hour conversion formulas should be removed from the federal regulations. If accreditors are going to be the purveyors of educational quality assessment, then accreditors should be given the discretion necessary to define the elements that go into the assessment paradigm. By creating the federal definition of a credit hour, the U.S. Department of Education federalized a basic academic concept and developed a complex and confusing system that unintentionally serves as a barrier to innovation in educational delivery models such as a movement toward competency-based assessment that allows students to complete course work in shorter periods of time. Thus, the federal definition of a credit hour should be removed and §602.24 (f) should be modified to address "Assessment of Learning Policies" and not "Credit Hour Policies."
5. **Changing Accreditors:** "Accreditation shopping" is not a new phenomenon to higher education but currently, accreditors are limited in any ability to curtail an institution's ability to seek a "safe harbor" with another accrediting body largely due to an action taken by their current institutional accreditor to hold the institution accountable. To curtail accreditation shopping, institutions that have been subject to an accreditation sanction (e.g., Probation Order) should be prohibited, for federal financial aid eligibility purposes, from seeking a new institutional accreditor for some set period of time after the sanction has been lifted (e.g., five years). ACCSC also recommends that under **34 CFR §600.11**, the Department provide additional parameters under the current "reasonable cause" language to include a condition that the Secretary will only consider changes in accreditation for rare and extenuating circumstances (proposed language **bold and underlined**):

§600.11 (a) *Change of accrediting agencies.* For purposes of §§600.4(a)(5)(i), 600.5(a)(6), and 600.6(a)(5)(i), the Secretary does not recognize the accreditation or preaccreditation of an otherwise eligible institution if that institution is in the process of changing its accrediting agency, unless the institution provides to the Secretary—

- (1) All materials related to its prior accreditation or preaccreditation; and
- (2) Materials demonstrating reasonable cause for changing its accrediting agency.

Institutions that have been subject to a sanction (e.g. Probation Order) are prohibited, for federal financial aid purposes, to seek a new institutional accreditor for five (5) years after the sanction has been lifted unless special circumstances arise and the institution can provide documentation of reasonable cause for changing its accrediting agency.

6. **Strengthening The Regulatory Triad:** ACCSC believes that it is prudent not only to clarify and articulate common understandings about the responsibilities of each member of the triad (federal, state and accreditor), but also recognizes that by increasing communication, there is an opportunity to better understand the responsibilities and common concerns of each member of the triad. In a number of different instances, the current Criteria for Recognition of Accrediting Agencies under **34 CFR Part 602**, which are statutorily mandated under Section 496 of the Higher Education Act, reinforce these shared gate-keeping responsibilities by requiring communication and collaboration among the triad partners. Oversight of higher education as set forth in current law and regulation is a shared

responsibility and each member of the regulatory triad has an essential role to play in the oversight of institutions. Thus, a more clear set of expectations for each member of the triad in the minds of all stakeholders and policymakers is essential as we move forward. Further, increased coordination amongst the members of the triad, particularly between accreditors and states, could result in a reduction of the unnecessary duplication of effort without impacting the quality assurance mechanisms currently in place.

Micro Areas:

- 1. Appeals Process:** The last reauthorization of the Higher Education Act yielded several significant changes to the process that accreditors must enact with regard to the appeal of an adverse accreditation decision. While ACCSC believes the Congress was well intentioned, the ensuing regulations have created a far more complex and cumbersome process that has not, in our experience, yielded greater due process for institutions. ACCSC suggests NACIQI review the history of legislative intent and regulatory changes in this regard and consider reverting back to the pre-2008 requirements. Of primary concern is that by adding a requirement that the Appeals Panel must be able to reverse or amend an action of an accrediting body can in effect make an Appeals Panel a “decision-making body.” Appeals Panels are typically not elected entities and are not beholden to the same criteria as the accrediting agency. This can cause significant tension for an accrediting agency. The options available to an appeals panel should be strictly limited to either uphold the action of the accrediting agency or to remand the action of the accrediting agency back to that agency for further consideration.
- 2. Substantive Changes:** Congress and the administration should review the provision under **34 CFR §602.22** that permits accreditors to visit only a “representative sample” of additional locations via “distributive enterprise” if an institution operates more than three additional locations and allow an institution to establish additional locations without prior approval from its accreditor. In ACCSC’s experience, growth of an institution, to include the addition of geographically distant campuses, requires greater oversight, not less. In order to ensure that accredited schools maintain their capability and administrative capacity to meet and exceed accrediting standards on an ongoing basis, as well as their obligations to students, accreditors should be required to visit and evaluate fully each campus or new location that will be participating in Title IV programs. As such, the distributed enterprise provisions should be removed in their entirety from **34 CFR §602.22**.
- 3. Roles and Scope of Accreditors:** As noted by NACIQI in its *2012 Report on Higher Education Act Reauthorization*, although accreditors stand prepared to carry out their gatekeeping functions and to manage the inherent tensions, the potential for risk and legal action associated with application of rigorous standards may be greater than a single accreditor is prepared to sustain. ACCSC encourages the Department to continue to consider the NACIQI recommendation of indemnifying accreditors by reducing the legal risk and burden (not from the Federal Government) beyond the provision for initial arbitration already in statute. Specifically, ACCSC recommends that language be adopted to strengthen **34 CFR §600.6 (d)** in order to provide accreditors with the same protections afforded to other government agencies as follows (proposed language **bold and underlined**):

§600.6 (d) The Secretary does not recognize the accreditation or pre-accreditation of an institution unless the institution agrees to submit any dispute involving the final denial, withdrawal, or termination of accreditation to initial arbitration before initiating any other legal action.

(1) Any legal action brought regarding an accrediting agency's decision must be constrained to an administrative review of the record before the accrediting commission at the time the agency made the accreditation decision.

Accreditation as an education quality assessment mechanism has been the hallmark of educational success in this country for over a century and has been relied upon by the federal government for this purpose for six decades. ACCSC believes that all accrediting agencies must continually evolve and explore opportunities to improve. ACCSC looks forward to continuing the dialogue with NACIQI to ensure that accreditation continues to fulfill its role as a gatekeeper of the Title IV federal student financial aid programs and to strengthen educational quality for all students. Please note that additional background information is being provided to NACIQI in **Appendix A** of this letter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michale S. McComis". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michale S. McComis, Ed.D.
Executive Director
ACCSC



Accrediting Commission of Career Schools and Colleges

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Appendix A: Background Information

Given that ACCSC has been continuously recognized by the U.S. Department of Education as a reliable authority on quality education since 1967, it goes without saying that our Commission is committed to the important role that accreditation plays in advancing quality education for students and in fulfilling its role as a gatekeeper to help ensure the continued integrity of the Title IV federal student financial aid programs. Over the past few years, ACCSC has been afforded multiple opportunities to share its perspective as a recognized accrediting agency, not only with NACIQI, but through testimony provided to various Congressional committees. Suffice to say, ACCSC shares NACIQI's focus on accountability and stated belief that accreditors accept the responsibility of demonstrating adequate rigor in accountability to assure that all accredited institutions meet reasonable standards of educational performance. For the betterment of higher education in the United States, ACCSC believes that accreditors must be willing and able to adapt and change, and must be willing to examine and embrace innovative approaches to quality assessment.

Accreditation as we know it today has been subject to increased scrutiny and criticism by a variety of organizations and policy makers who have valid questions about whether or not accreditors are fulfilling their promise. ACCSC recognizes that the expectations of accreditors by the federal government are changing, such that accreditors are subject to far greater federal oversight than at any time in the past. ACCSC also recognizes that both Congress and the administration have a vested interest in ensuring that the strength of any accrediting agency is at an appropriate level before that agency may be recognized as a gatekeeper to Title IV funds. As such, it is ACCSC's hope that changes to the Higher Education Act will be responsible and appropriate and will not interject undue federal intrusion into the academic processes of higher education.

Since NACIQI issued its *Higher Education Accreditation Reauthorization Policy Recommendations* in 2012, there have been many examples of how accreditors such as ACCSC have embraced that challenge of demonstrating that accreditation is both reliable and dependable without a federal mandate, including:

- Many recognized accreditors, including ACCSC, have adopted transparency initiatives in order to provide information that focuses on explaining accreditation in a manner that enhances the public's understanding of what accreditation means and which promotes the sharing of information amongst regulatory partners;
- In order to address potential confusion among students and the general public regarding accreditation actions, all recognized regional accrediting bodies have adopted of a common framework and understanding of terms for key actions regarding accredited institutions which has set a pathway for other accreditors to emulate. ACCSC has proposed a revision to its accreditation action definitions to align with the language adopted by regional accrediting commissions in the hopes of ensuring a better understanding of accreditation and hopes that other recognized institutional agencies consider similar revisions.
- To bolster confidence in accreditation, and reinforce ACCSC's long standing requirement that institutions maintain "verifiable records of initial employment," ACCSC adopted a new policy requiring institutions seeking accreditation to engage an independent third-party auditor to verify the most recently reported graduate employment data.

Through these types of actions, the community of recognized accreditors are demonstrating that as an enterprise, accreditation is working earnestly toward moving the discussion from skepticism to confidence without increased federal involvement. In order to maintain the integrity of accreditation, accreditors, as the most experienced source of information on academic quality, must be given ample trust to establish and enforce the standards and practices that best align with the institutions they serve. Although accreditation has room for enhancement and improvement, ACCSC sincerely believes that accreditation can be strengthened while retaining the positive qualities and the expertise that peer-review captures without federally mandated intervention into accreditation affairs.

It is ACCSC's hope that any judgment regarding the effectiveness of accreditation not lose sight of the fact that the oversight of higher education, as set forth in current law and regulation, is a shared responsibility. Each member of the regulatory triad – state government, accreditor, and federal government – has an essential role to play in the oversight of institutions. In this regard, Congress and the administration should consider several of the recommendations made by NACIQI in its 2012 Report, including the need to clarify and to articulate common understandings about the responsibilities of each member of the triad, and foster increased communication among triad actors to achieve greater commonality across the quality assurance/eligibility enterprise. By continuing to work together in partnership with the various organizations within the regulatory triad, ACCSC believes we can strengthen the existing oversight system while retaining the positive qualities of accreditation and the expertise and nuance that peer-review represents and delivers.

Moreover, for the sake of higher education's advancement, the higher education community – including accrediting agencies – must be allowed to adapt and innovate in order to accommodate the diversity of students, student preferences, and learning styles. This supports reasons why there is not, and should not be, a one-size-fits-all system of accreditation. As higher education takes a more diverse shape, accrediting agencies and the peer review process should foster avenues for institutions to develop and deploy innovative approaches that both increase access to higher education and fundamentally change the manner in which education is delivered.

Ensuring the quality and integrity of these programs without undue regulatory burden must also remain a paramount concern. The federal definition of a credit hour, however, is an example of undue regulatory burden and intrusion into the academic process by the federal government that stunts innovation. In my experience, competency models of student assessment are superior to “seat-time” models of student fulfillment. But, by creating the federal definition of a credit hour, the U.S. Department of Education federalized a basic academic concept and developed a complex and confusing system that unintentionally serves as a barrier to innovation in educational delivery models such as a movement to competency assessment. Although the Department's position on “direct assessment” is a step in the right direction, it coexists in federal regulation with the federal definition of a credit hour, which causes uncertainty on how to move forward with more innovative models.

Sheffield, Cathy

From: Griffiths, Carol
Sent: Tuesday, May 27, 2014 9:09 AM
To: Sheffield, Cathy
Subject: FW: Invitation from the National Advisory Committee on Institutional Quality and Integrity (NACIQI)
Attachments: Lumina_Federal_Policy_Priorities-full.pdf

From: Jamie Merisotis [<mailto:jmerisotis@luminafoundation.org>]
Sent: Sunday, May 25, 2014 11:39 PM
To: Griffiths, Carol
Cc: Julie Peller; Holiday Hart McKiernan; Stefanie Krevda
Subject: RE: Invitation from the National Advisory Committee on Institutional Quality and Integrity (NACIQI)

Dear Carol:

Thank you for your note. We've been pondering your request for some time and appreciate the opportunity to share our views.

Lumina Foundation believes that, in order to reach the nation's postsecondary attainment goals, we need a 21st century higher education system that is focused on student success and high-quality learning. Last week, the Foundation released a statement of federal policy priorities (attached) that outlines a new framework for federal policy that is student-centered, encourages completion, and serves the needs of all students--including working adults, low-income students, first-generation students and students of color.

Quality assurance is essential to make certain that this system is serving all students. However, we believe that the current federal quality assurance framework does not adequately incent postsecondary education providers, including institutions of higher education, to innovate and ensure that all are delivering high-quality education. Further, as students become more diverse and the modes of postsecondary education delivery continue to evolve, we believe that students, providers, and policymakers must be better informed of the outcomes of postsecondary education.

To meet the needs of 21st century students, the federal quality-assurance system should be based on student learning, place a priority on measures of student success, be transparent, and allow for a wide array of credentials, providers, and modes of delivery. Such a system should hold providers of postsecondary education accountable for delivering credentials that represent demonstrated learning and have meaningful value in the job market.

Thank you again for the opportunity to share our views. We hope these ideas are useful for your discussions.

Sincerely,

Jamie Merisotis



21st century

higher education

pathways

clear and transparent

funds and resources

student success

quality

outcomes

attainment



FEDERAL POLICY PRIORITIES

benefits

affordable

degree

credential

students of color

investment

financial aid

postsecondary education



LuminaTM
FOUNDATION

A STATEMENT OF FEDERAL POLICY PRIORITIES

As the nation strives to meet the growing need for talent to drive today's knowledge economy and democratic society, more and more Americans agree that increasing postsecondary attainment is critical. In fact, consensus has never been stronger that higher rates of college-level learning are needed — both to ensure the nation's progress and to enhance the lives of millions of individual Americans. That's why 38 states, several regions, national higher education associations, many colleges and universities, and the president all have set goals to significantly increase higher education attainment. We at Lumina Foundation also work toward such a goal, one we call Goal 2025. By the year 2025, we want 60 percent of Americans to hold a high-quality college degree, certificate or other credential.

To reach this goal, the country needs a 21st century higher education system focused on student success and high-quality learning. Federal policy can and must help build that system — one that reflects the reality of 21st century students and fits postsecondary education's rapidly changing environment. Students need postsecondary education that helps them meet their goals for the future, including a good job and a good life. They should not have to incur so much debt that they choose not to follow public-service career paths, such as teaching, or that they indefinitely postpone buying a house, opening a business or starting a family. Students and their employers should know what degrees and other credentials mean in terms of the knowledge and skills students have attained — not just how many hours they sat in classrooms.

For the vision of a 21st century higher education system to become a reality, federal policy must change in significant ways. The federal government's role has long been invaluable in enabling access to postsecondary education. Significant acts — such as the creation of public land grant colleges, the GI bill, and the Pell grant — have made it possible for millions of students to gain access to postsecondary education. However, while it is critical to remain focused on access, those policies are no longer sufficient to meet the needs of the 21st century. More than 36 million adults have some college, but no degree;¹ the federal government, together with states and other stakeholders, must work to close that gap and ensure success for more students.

To do so, federal policy needs to look beyond access to encompass student success and:

- Provide incentives to both students and institutions to encourage program completion and genuine learning.
- Work for all students in the 21st century, including working adults, low-income students, first-generation students and students of color.
- Be far more open and transparent, so students from all backgrounds can see clear pathways into and through higher education.

- Recognize learning wherever it is obtained — not just in traditional postsecondary institutions, but also in the military, in the workplace, and in other settings.
- Assure that the necessary tools are available to build and maintain this 21st century system, including information systems and data on results and outcomes.

Enabling more students to complete a high-quality postsecondary credential is a task that requires national, not only federal, attention. To achieve success, federal and state governments, along with other key stakeholders, must collaborate with one another on a robust, shared agenda. Historically, the nation's system of postsecondary education has depended on strong involvement from both the federal and state governments. However, it seems that they are no longer working together to maximize success for students, and there is a great opportunity for enhanced collaboration and shared work toward common goals. A revised policy framework for postsecondary education must clearly define the shared responsibility among states, the federal government, and other key stakeholders.

Building the 21st century higher education system will require action on the part of many Americans, including colleges and universities (and the range of constituencies within them), communities large and small, state policymakers, business leaders and philanthropic organizations. Federal policymakers, too, must take action. This statement of federal policy priorities is intended to prompt discussion about how higher education needs to change, and what the federal government can do to help bring about those changes.*

Lumina Foundation believes the federal government can craft policies to achieve the nation's attainment goals by:

1. Supporting the creation and expansion of transparent pathways to high-quality degrees and other credentials.
2. Ensuring that postsecondary education is affordable to all who need it.
3. Assuring the quality of credentials and providers in terms of student learning.

* This document is intended to lay out a set of principles and a substantive framework for policy consideration. It does not address the capacity, collaboration or other key actions that would be necessary to implement the suggested reforms.

Priority 1: Support the creation and expansion of transparent pathways to high-quality degrees and other credentials.

Most federal policies governing postsecondary education were enacted decades ago, when the full-time, residential campus experience was the norm and most students were 18-22 years old. Those days are gone. Today, 26 percent of students are over the age of 26; 33 percent transfer at least once; 32 percent take an online course; 37 percent attend part-time; 88 percent live off-campus; only 54 percent graduate within six years; 50 percent work while in school full-time and 82 percent while enrolled part-time; and the average cumulative debt burden for bachelor's recipients is approaching \$30,000.² Postsecondary education providers, and the policies that support them, need to adapt to these massive demographic changes.

1. **Students should have access to a variety of high-quality postsecondary education providers to meet their educational needs.** In order for 21st century students to succeed, federal policies need to support a much wider range of pathways to a credential. That includes assuring that all postsecondary-level learning is recognized, regardless of where it was obtained; creating pathways of “stackable” credentials that encourage students to be lifelong learners; and challenging all stakeholders in the system to continually improve to meet changing demands for knowledge and skills.
 - a. **Recognize a wider array of postsecondary education providers.** By serving as the gatekeeper for access to federal student financial aid and grant funding, the federal government plays a significant role in defining “what counts” as a postsecondary education provider. Currently, providers are narrowly defined as either institutions of higher education or job-training programs. However, because today's economy requires people to be lifelong learners, federal policy must shift to recognize the universe of postsecondary providers and the wide variety of pathways students take to earn postsecondary credentials. This shift requires that federal policies help ensure higher standards of quality for all types of providers to protect students and taxpayer dollars.
 - b. **Encourage postsecondary education providers to collaborate with one another and forge pathways to credentials of value.** As students take multiple pathways to earn credentials, federal policies should allow and encourage providers to work closely with one another to ensure that all high-quality learning is counted and that students can easily navigate the system.
2. **Allow and support innovation in postsecondary education to improve outcomes for students.** To meet the changing needs of postsecondary students and providers, federal policy must allow for innovation while offering incentives to help providers protect students and ensure quality.
 - a. **Help existing postsecondary education providers employ new methods to deliver learning and build new educational pathways to meet students' attainment goals.** Existing postsecondary education providers must play a critical role in the postsecondary ecosystem. In order to achieve the highest quality for students, policies should help providers adapt to changing talent needs, demographics and methods of instruction.

- b. **Allow for experimentation to develop new high-quality, low-cost delivery models and credentials.** Federal policy can allow postsecondary providers to experiment by offering flexibility in awarding federal aid to students. Experimentation can advance the field and test new approaches to high-quality postsecondary delivery that increase student outcomes and lower cost to students and cost of delivery, while protecting students and the taxpayer from waste, fraud and abuse. Experimentation should lead to new approaches that can be tested at scale and, when proven effective, be used to change and adapt federal programs across the board.
 - c. **Streamline regulations to assure that high-performing postsecondary education providers are rewarded with regulatory flexibility and allow for innovation in the field.** The current regulatory scheme is burdensome and complicated, making it difficult for providers to challenge the status quo. A refreshed system of regulations should clearly define desired outcomes and require only items necessary to achieve those outcomes. This will balance the important role of protecting student and taxpayer funding while encouraging innovation in the field.
3. **Where the federal government directly funds higher education providers, demand clear evidence of high-quality outcomes for students.** Federal policy can change institutional behavior through direct investments by ensuring that programs have clear and challenging outcomes for students, and that all learning is evaluated.
- a. **Direct federal resources to providers that demonstrate continuous improvement in student attainment, especially among students from traditionally underrepresented groups.** Distributing funds based on student outcomes will ensure that providers put students' success first and align academic and student services in ways that improve outcomes. This is especially important because it can encourage providers to help close the equity gap in today's system. Fifty-six percent of top-scoring African-American and Latino high school students do not receive a college degree, while only 37 percent of top-scoring white students fail to attend and finish college.³ With these trends it is not surprising that more than three-fourths of the nation's professional degree holders are white. Federal policy and investment can help address this inequity by disaggregating data, reforming funding formulas, and holding providers accountable for outcomes for all students.
 - b. **Evaluate federal programs and providers based on success in achieving student attainment goals.** As investment is redirected to increase student success, evaluations should focus on achieving that success, taking into account the population served and the progress achieved in improving attainment for underserved students. Further, evaluations should be designed not only to judge the quality of the particular investment, but also to inform stakeholders of best practices.

Priority 2: Ensure that postsecondary education is affordable to all who need it.

The rising costs of a postsecondary education, and the growing portion of those costs being borne by students, represent a clear barrier to reaching the nation's attainment goals. Federal and state governments must work together with providers to make college more affordable for students and help ensure that they have access to programs in which they are likely to succeed. Federal policy must not only focus on students' ability to pay for postsecondary education, but should hold states and providers accountable for ensuring that the price of a postsecondary education no longer presents a barrier to access and success.

1. Federal student aid programs should both ensure access to higher education and provide incentives to complete programs.

- Historically, federal student aid programs provided financial access to postsecondary education. To meet the needs of 21st century students, however, student aid policies must not only provide access, but also encourage student success.
- a. **Structure federal student aid programs so that postsecondary education is affordable for low-income students.** Family income should not be a barrier to enrolling in or completing college. To break this barrier down, subsidies for students with financial need must be prioritized. In other words, lowest-income students should be subsidized first, ensuring their access to an affordable, high-quality education. Aid should be flexible enough to meet unique needs that may arise throughout a student's term. Further, student loans should be repayable in a reasonable period and at a reasonable rate.
 - b. **Make the costs borne by students and families more predictable and transparent.** Students and families need and deserve clear information about college costs and financing expectations that can aid their decisions about enrolling in and paying for postsecondary education. Well before enrolling, they should be informed about financial aid, their expected annual costs, and the expected total cost to earn a credential. This information should be based on the best available information and be updated throughout the course of study. Further, students and families should be able to compare the costs of various providers and programs prior to making a choice.
 - c. **Provide incentives to increase degree and credential completion, reduce price, and limit student borrowing.** Federal student aid should be used as a tool that encourages students to complete programs and helps all involved parties recognize and accept their shared responsibility for student success. Students who drop out are much more likely to default on their student loans;⁴ the federal student aid program should be structured to encourage providers as well as students to avoid that outcome.

- ### **2. Students should be able to easily access and manage postsecondary education benefits to forge a smooth path toward their goal.**
- Today's students and families often are left on their own to navigate the multiple avenues to paying for postsecondary education, a process that often requires them to piece together multiple benefits. In a student-centered system, benefits delivery and allocation would be simplified across the various federal agencies that provide student aid, including the Departments of Education, Veterans Affairs, Defense and Labor. Further, as much as possible, students should be able to use those benefits as a package to meet their education goals.

- a. **Ensure that students can easily apply for, view and monitor their use of all federal postsecondary education benefits for which they qualify.** Gaining access to the full array of federal postsecondary education benefits can be a confusing process for students. A simpler process for aid application, such as a common application, would give prospective students and families information about postsecondary benefits afforded to them across agencies, such as tuition assistance benefits from the Department of Defense and Direct Loans from the Department of Education. Knowing about multiple benefits, students may be more likely to apply to a postsecondary program and more likely to attend full time. The application should be available to students at any time of year, and it should require applicants to enter information required for multiple programs only once.⁵ Further, students should be able to easily monitor their use of benefits and to aggregate their federal resources/benefits to some extent. With a full picture of their benefits, students will better understand the financial supports available to them.
 - b. **Align minimum standards for student eligibility across federal benefits to the greatest extent possible.** Aligning the various eligibility standards would simplify the system and make the entire package of federal student aid benefits clearer to students who need aid. This approach would help ensure that students maximize their use of the aid programs for which they are eligible, reducing students' cost burden and increasing completion.
- 3. Students should be encouraged to use benefits at the provider where they are most likely to succeed.** The wide variety of providers and programs available to American students is a great strength of our system, but also a potential weakness. Appropriately, the variety allows students to identify programs that best meet their individual education and career goals. However, students often lack the right tools and information to navigate the system and make informed choices.
- a. **Permit students to use all postsecondary education benefits at a variety of providers that are held to high standards of quality.** Currently, different federal programs — including those in the Departments of Education, Labor, Veterans Affairs and Defense — have different standards of eligibility for providers and therefore offer varying levels of quality assurance. Establishing minimum standards across different federal benefits would help students know where they can use federal benefits to obtain a high-quality credential. In addition, alignment would ease confusion about which benefits can be used where and would also reduce duplicative quality-assurance processes.
 - b. **Provide students with clear, accurate and meaningful information about providers.** Along with clear information about costs and financing options, students should be able to compare information — across institutions and programs — about the success of other students who are like them (i.e., students from a similar financial background, transfer students or students in their proposed program of study). This cross-comparative information should be structured so that students are encouraged to choose a provider where they are likely to complete in a timely manner and earn a high-quality credential.

Priority 3: Assure the quality of credentials and providers in terms of student learning.

In the 21st century higher education system, quality must be defined by the results that students obtain, not by the type or characteristics of the institutions they attend. As the student population grows in size and diversity, providers, students and policymakers must be better informed of, and held accountable to, the purpose, goals and outcomes of postsecondary learning.

1. The federal quality-assurance system should be outcomes-based, place a priority on measures of student success, be transparent, and allow for a wide array of credentials, providers and modes of delivery.

Quality assurance for students must ensure that providers deliver all of the following: adequate access to education; credentials that represent demonstrated learning; supports that help students complete their programs, and the ability to gain financial stability by using what they have learned.

- a. **Hold validators accountable for measuring student outcomes, being transparent and encouraging providers to innovate toward higher-quality, lower-cost programs.** Current validators of quality — traditionally accreditors — have recently begun to move away from a system based largely on inputs to one where student learning outcomes are increasingly valued. However, there are few incentives that compel validators to make student learning central to their assessments, or to hold institutions accountable for higher-quality, lower-cost programs of study. Also, accreditors are inconsistent with regard to how they assess institutions, and limited transparency makes it difficult for students and employers to understand what accreditation means in terms of the quality of learning. Moving to a quality-assurance system based primarily on the validation of learning can provide much more useful information to students, educators, employers, policymakers and the public.
- b. **Recognize new validators, in addition to current ones, as assessors of educational quality.** Federal policy should provide incentives and support mechanisms for additional third parties to serve as arbiters of value. For example, certifications or programs approved by various industry groups are a way of linking skills taught in the classroom to skills needed in particular jobs.
- c. **Ensure protections for students and taxpayers against waste, fraud and abuse.** While promoting greater participation of students and providers in federal postsecondary programs, policies must be put in place to monitor providers and validators to ensure that students are receiving, and federal dollars are paying for, learning that amounts to a credential of value.

2. Students, policymakers and other stakeholders should have access to key indicators of quality and measurements of the return on investment for both students and taxpayers.

Quality-assurance metrics must validate that institutions provide students with: adequate access to education; credentials that represent demonstrated learning; supports that help students complete their programs, and the ability to gain

financial stability by using what they have learned. Such metrics include progression and completion data, student debt levels, and program-level labor market outcomes. Where appropriate, these metrics also should reflect the characteristics of different types of institutions.

- a. **Ensure that metrics and data are comparable across providers and states.** In an increasingly mobile society, it is critical that we be able to determine outcomes as students move through postsecondary education and among institutions, regions and states. One-third of students transfer at some point before earning a degree, and 27 percent of those who transfer do so across state lines.⁶
- b. **Be clear about the use and purpose of the metrics.** The federal government has a role in assessing metrics of quality for accountability as well as being a repository for information important to families and students who make choices about postsecondary education. The use of a particular metric should be made clear in its design, so as to best answer the question posed.
- c. **Require that data collected and shared clearly reflect all types of students.** Data collected and reported should reflect the realities of 21st century students. Current outcomes data reported by the federal government (and used for a variety of purposes such as College Navigator or the College Scorecard), includes only first-time, full-time enrollees, representing about 15 percent of today's students.⁷ This means that vast swaths of the student population, including the growing population of returning adults and part-time enrollees, are left in the dark about their statistical chances for success. Further, data and metrics must capture trends over time as students move into and through the postsecondary system and into the workforce.
- d. **As much as possible, collect similar data related to students in all federal programs connected to postsecondary education.** Currently there is no way to compare outcomes from programs at the Departments of Education, Labor, Veterans Affairs and Defense, even if these programs are serving the same or similar groups of students. Each agency develops its own indicators of quality, and each interacts rarely, if at all, with other agencies and programs that serve the same or similar groups. As education past high school becomes a prerequisite for the workforce, all federal programs must be able to comparatively evaluate their effectiveness.

3. Students, policymakers and other stakeholders should have access to clear and transparent information to assess the quality of credentials. To ensure that a student earns a credential of value, institutions, employers and consumers must know what knowledge and skills are represented by that credential. Currently the meaning of degrees, certificates and other credentials is rarely validated outside academia; this makes it difficult for any stakeholder to ascertain and compare quality across programs.

- a. **Encourage providers to use a transparent method that identifies and rewards student learning, not seat time, as the core basis for assessing student outcomes.** By clearly defining and accounting for the competencies required in a course or program, providers can clearly communicate and reward student learning rather than merely account for the amount of time a student has spent with the provider.

- b. **Encourage states, providers and organizations to develop meaningful and comparable measures of student learning, employment and other outcomes.** Time has been the universally accepted measure in postsecondary education, but this is changing. Federal policy should encourage the development and use of meaningful measures of student learning. These measures must allow for common understanding across providers, be externally validated and tested, and connect to employment and other outcomes for students.

Endnotes

- 1 U.S. Census Bureau, 2012 American Community Survey.
- 2 CLASP, "Yesterday's Non Traditional Student is Today's Traditional Student," using NPSAS 2008. National Student Clearinghouse: Research Center, Fall 2013, Snapshot Report: Degree Attainment: Age Distribution of Bachelor's Degrees: 2009, 2013; National Student Clearinghouse: Research Center, Feb. 2012, "Signature Report: Transfer & Mobility: A National View of Pre-Degree Student Movement in Postsecondary Institutions," I. Elaine Allen and Jeff Seaman, "Grade Change: Tracking Online Education in the United States," (Babson Survey Research Group, 2014); "Examining the Effect of Off-Campus College Students on Poverty Rates," (Washington, D.C.: U.S. Census Bureau, 2013); Shapiro and Dundar, "Signature Report 4: Completing College: A National View of Student Attainment Rates," (Herndon, Va.: National Student Clearinghouse, 2012). "College Enrollment and Work Activity of 2013 High School Graduates" (Washington, D.C.: Bureau of Labor Statistics, 2013). "Student Debt and the Class of 2012," (Oakland, Calif.: The Institute for College Access and Success, 2013).
- 3 Anthony Carnevale and Jeff Strohl, "Separate & Unequal: How Higher Education Reinforces the Intergenerational Reproduction of White Racial Privilege" (Washington, D.C.: Georgetown University Center on Education and the Workforce, 2013), p. 29.; Jamie Merisotis and Anthony Carnevale, "Separate and Unequal Education is Hurting America," *Roll Call*, November 13, 2013, online edition.
- 4 Mary Nguyen, "Degreeless in Debt: What Happens to Borrowers Who Drop Out" (Washington, D.C.: Education Sector, 2012).
- 5 There are 2.3 million students each year who do not file an application with the Department of Education, but would have qualified for federal financial aid. Novak and McKinney, "The Consequences of Leaving Money on the Table: Examining Persistence Among Students Who Did Not File the FASFA," *Journal of Financial Aid*, 41(3) 2011.
- 6 "Signature Report: Transfer & Mobility: A National View of Pre-Degree Student Movement in Postsecondary Institutions," (Herndon, Va.: National Student Clearinghouse, 2012).
- 7 "Digest of Education Statistics: 2012," (Washington, D.C.: National Center for Education Statistics, 2013), Tables 232 and 221.



Lumina Foundation is an independent, private foundation committed to increasing the proportion of Americans with high-quality degrees, certificates and other credentials to 60 percent by 2025. Lumina's outcomes-based approach focuses on helping to design and build an accessible, responsive and accountable higher education system while fostering a national sense of urgency for action to achieve Goal 2025.

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May 2014



ASSOCIATION OF AMERICAN UNIVERSITIES

May 22, 2014

Carol Griffiths
Executive Director
NACIQI
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Director Griffiths:

The Association of American Universities, a nonprofit association of 60 American preeminent public and private research universities, appreciates this opportunity to share its views on accreditation, as the National Advisory Committee on Institutional Quality and Integrity (NACIQI) considers recommendations to the Secretary of Education on the reauthorization of the Higher Education Act. AAU was actively involved in deliberations in 2011, providing four sets of written comments and oral testimony on ideas for accreditation reform. We look forward to a continuing dialogue as the committee prepares its second report to the Secretary.

We believe that the accreditation process performs an integral role in U.S. higher education. It reflects a fundamental responsibility for all institutions to demonstrate the ability to provide a quality education in return for federal student aid. The nature of accreditation has changed dramatically in recent years at the same time that our system of higher education has become much less local and much more diverse. With such a diverse higher education system, many have concluded that the accreditation process is not effectively meeting its core functions of assuring basic compliance for the purpose of federal student aid eligibility and effectively facilitating self-improvement through peer review.

We agree with the 2011 NACIQI Higher Education Act (HEA) recommendation to retain linkage between accreditation and eligibility for federal funds. The federal government is providing public funds to enable students to pursue an education, and accreditation, *if* properly carried out, is the government's best indicator that an institution is capable of providing a quality education consistent with its mission. The accreditation process is designed to be largely a complementary one. The federal government (Department of Education) should focus on financial integrity and stability issues (primarily non-academic compliance issues), and accreditors—as non-federal entities—should have responsibility for academic evaluation as a tool for determining quality, allowing for flexibility and informed academic judgment. Indeed, the key strength of accreditation is its reliance on peer review and candid assessments of institutional and program quality by individuals who are engaged in higher education.

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Case Western Reserve University
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New York University
Northwestern University
The Ohio State University
The Pennsylvania State University
Princeton University
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Rice University
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Stanford University
Stony Brook University –
State University of New York
Texas A&M University
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University at Buffalo –
State University of New York
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University of Oregon
University of Pennsylvania
University of Pittsburgh
University of Rochester
University of Southern California
The University of Texas at Austin
University of Toronto
University of Virginia
University of Washington
University of Wisconsin - Madison
Vanderbilt University
Washington University in St. Louis
Yale University

Our model of assuring institutional quality has made the American system of higher education the most creative and diverse in the world. But we can be even better. While our members report many positive interactions and outcomes through the accreditation process, the system faces major problems that need to be addressed to effectively curb fraud and abuse, and crack down on poor performing institutions without infringing on the academic freedom and autonomy of institutions with a proven record of success.

For the purpose of this document, we will focus on two major problems and potential solutions.

1. Cost-Benefit Disparity and Regulatory Burdens

We believe that it is very important to avoid drifting into a system in which the cost of data collection and reporting requirements for accreditation are excessive without any commensurate benefit to students. In the last decade, reviews at many AAU institutions have become increasingly onerous and time-consuming for senior administrators, faculty, institutional researchers, and information technology officials, with costs for some in excess of \$1 million¹. In some cases, in responding to regulations, guidance, or sub-guidance issued by the Department of Education, accreditors are forced to revise their procedures in a way that results in confusion and even more bureaucracy, while the ability of institutions to provide quality programs that fit their unique mission is diminished. Institutions are often subject to different interpretations and liabilities as regional staff try to decipher regulations and sub regulatory guidance. AAU provided NACIQI with these details through our written and oral testimony in 2011.

While we agree with the need for an increased focus by accreditors on schools that do not provide meaningful educational experiences for their students (or operate without integrity or basic competence), it seems that accreditors are often unable to distinguish between institutions with a long record of high performance and those without one.

2. Inappropriate Assessment Measures

A second major concern among our institutions is the pressure to apply assessment mechanisms misaligned with their mission that detract from institutionally driven means to improving learning. The *Higher Education Opportunity Act* specifically prevented the federal government from regulating on student achievement. Now, however, some accreditors are demanding and defining direct evidence of student achievement in a manner viewed by faculty as bureaucratic compliance without benefits for students, to the detriment of the assessment effort as a whole on campus.

A recent survey of AAU members showed that while efforts to assess and improve undergraduate student learning are expanding, few of our members use standardized tests because they do not match up to appropriate learning outcomes for their institutions or programs, they do not assist in improving learning, and the tests have methodological and logistical drawbacks. Most of our members find that the Collegiate Learning Assessment (CLA) and other such tests are significantly flawed and do not connect to their own learning criteria, and provide little information on how or where to improve student learning. They do, however, use a wide-

¹ AAU is working with the Task Force on Government Regulation of Higher Education, co-chaired by Chancellors Nicholas Zeppos of Vanderbilt University and William Kirwan of the University System of Maryland to address these, and other, accreditation regulatory issues.

range of methods (quantitative and qualitative) to assess and improve learning...all of which are discipline-specific, program-level assessments that are faculty driven, rather than standardized.

From our perspective, there are two potential solutions to the problems outlined above.

1. Expedited Review

To address the problem of cost-benefit disparity and over-regulation, we endorse the NACIQI HEA recommendations and the ACE accreditation report, *Assuring Quality in the 21st Century: Self-Regulation in a New Era*, urging that accreditors should have full authority, and be encouraged, to implement expedited review procedures for institutions with a record of stability and successful performance. Risk-adjusted scrutiny is a standard and indispensable regulatory practice. Risk-based assessment would allow accreditors to focus more on institutions that present the greatest potential for serious academic or financial problems, and to take quicker action against failing institutions, all while decreasing the burden and intrusiveness of the process on well-performing institutions. Most importantly, this system would serve the interests of students because the accreditors would be addressing real risks to educational quality.

In sum, we request that the Administration and Congress support an amendment to the HEA that would provide unequivocal authority and flexibility to accreditors to design and implement a system of expedited review.

We also oppose attempts by the Department of Education to require accreditors to take on additional roles. Accreditors should not be asked to serve as enforcement agents for the Department. The federal government should help ensure that the Department takes direct actions against institutions for infractions. The Department's authority to take action against a college or university is used very rarely and unevenly. When accreditors are carrying out appropriate responsibilities, we support removing obstacles, to the extent they exist, that prevent them from acting quickly against substandard institutions. If changes in the law are necessary to achieve this goal, we stand ready to get appropriate measures enacted.

2. Student Achievement

We want to be clear about our institutions' unqualified commitment to achieving student success and we strongly support a system in which all institutions, working with their institutional accreditors, are expected to provide evidence of such success. The demonstration of quality is a fundamental responsibility, but the kinds of quality and the methods used to measure it will differ depending on the mission of the institution.

AAU helped to lead an effort of the six presidential higher education associations and seven regional accreditors in July 2013 that culminated in a consensus statement, "Principles for Effective Assessment of Student Achievement" (attached).

While the exact content of these criteria and the methods for measuring them will differ, all IHEs should be expected to provide evidence of success in three areas: evidence of student learning experience (institutions should be able to describe the kinds of experiences they expect students to have inside and outside the classroom), evaluation of student academic performance, and post-graduation outcomes (e.g. completion, job placement, post-graduate work, civic participation etc.).

Importantly, institutions should be able to determine which instrument they use to measure progress in these areas. We believe that measures of all kinds work best if they are integrated into the teaching and administration of colleges, closely linked to the curriculum students are learning, and analyzed on a regular basis.

In sum, the current language prohibiting the federal government from regulating student achievement standards should be preserved. We may need to clarify that the current language requiring accreditors to have standards that assess success with respect to student achievement should not be interpreted as a requirement that institutions adopt quantitative, value-added general assessment measures.

The principles statement mentioned above is an example of how the community (institutions and accreditors) has been proactive in this arena, without the interference of the federal government. We view this as an important indicator of how we plan to continue to work together in coming months and years.

In conclusion, we believe that accreditation plays a critical role in U.S. higher education. We are committed to strengthening the current system to respond effectively to concerns about accountability and transparency, while also allowing university leaders the appropriate institutional autonomy to manage their institution according to its unique mission and academic standards.

Sincerely,

A handwritten signature in black ink that reads "Hunter R. Rawlings III". The signature is written in a cursive style with a small flourish at the end.

Hunter R. Rawlings III
President



RECOMMENDATIONS CONCERNING ACCREDITATION POLICY

Thank you for the opportunity to present Princeton University's recommendations relating to accreditation policy, which NACIQI is reviewing in developing recommendations to the Secretary of Education for changes in the Higher Education Act, and measuring student achievement.

As you know, this is a difficult, complex, and pivotal time for higher education accreditation. In the past, one might reasonably have supposed that all colleges were motivated primarily by a desire to meet the educational needs of their students, not by profit maximization. Some were newly formed, some were well-established, but all were engaged in a public service mission. That is less so today, and this increasingly complex institutional landscape has led to an increasingly complex regulatory environment, not just for colleges, but also for accreditors.

We appreciate the role that accreditation has played over many decades in assessing whether institutions meet the threshold requirements to participate in certain federal programs and in encouraging institutions to undertake programs of continual improvement. Properly construed and conducted, we believe accreditation can, should, and sometimes does continue to play those roles. But to do so effectively, accreditors must identify and redress poor performance without imposing costly and unproductive burdens on institutions that serve their students well.

Expedited Review

We believe that one of the most important steps that could be taken would be the adoption of a policy of expedited, risk-based review that required well-performing institutions to demonstrate that they meet appropriate and agreed-upon standards for effective performance and that they are engaged in continuous improvement while reducing the imposition of unproductive, burdensome and costly requirements on these institutions, thereby allowing accreditors to focus increased attention on institutions that are not operating with integrity or basic competence and do not provide meaningful educational experiences for their students.

Princeton has testified several times before NACIQI on the topic of expedited, risk-based review, and we were pleased that the Committee's recommendations to the Secretary included the following as part of its findings:

Currently, it appears that both federal and accreditor participants in the quality assurance enterprise are relatively undifferentiated in their reviews. That is, the same level of scrutiny and intensity of review is given to accreditors and institutions with longstanding

National Advisory Committee on Institutional Quality and Integrity
c/o Carol Griffiths
Executive Director
1990 K Street NW
Washington, DC 20006

Dear Madam Chairperson Phillips:

Thank you for the invitation to submit a paper sharing my thoughts on the most important considerations in advancing quality in higher education. I appreciate the opportunity to continue to participate in the dialogue with the National Advisory Committee on Institutional Quality and Integrity (NACIQI) as you consider recommendations for changes to the Higher Education Act.

My thoughts on this issue have been shaped by the various roles I have had during my career. Over the course of my career, I have participated in accreditation self-studies at a local institution. I have served as a state regulator responsible for approving postsecondary institutions and programs. For over 13 years, I served as a career civil servant with the US Department of Education in a variety of leadership roles responsible for higher education policy – including Deputy Director of the Commission on the Future of Higher Education and Acting Deputy Assistant Secretary for Higher Education Programs. Finally, in my current role as the Senior Vice President, Regulatory Affairs & Public Policy of Bridepoint Education, a higher education technology services provider that offers on-line degrees and programs to students across the country, I have seen first-hand the unintended consequences to students and institutions inherent in our nation’s current quality assurance system

In response to your question, “What issues are critical to consider in advancing quality assurance in higher education, going forward?” I will focus on key recommendations first identified almost a decade ago and recently reinforced by NACIQI with respect to the need to clarify and articulate common understanding about the responsibilities of each member of the triad (federal, state and accreditor).

This paper first reviews the key issues facing accreditation and quality assurance identified almost a decade ago; then outlines how the current external environment and pressures on institutions and quality assurance make the issues still relevant today. Finally, I propose a strategy for the creation of a national NOT federal quality assurance framework that brings the

members of the triad together in a collaborative way to better meet the needs of students, families, and key external stakeholders including government agencies.

Review of Key Issues Facing Accreditation

For more than 100 years, the accreditation system in the United States has been used as the primary vehicle for defining and assuring quality in the delivery of higher education services. In this complex public-private system, recognized accreditation organizations develop quality standards and manage the process for determining whether institutions and programs meet these standards and can be formally accredited.

The call for increased public accountability of higher education and questions regarding the role accreditation plays in assuring education quality and as a gatekeeper to Title IV funds is not a new conversation. In fact, it has been underway for well over 25 years. The lack of consistency and transparency in the accreditation system created major concerns about whether the accreditation community was able to assure consistent levels of quality and be counted on to support national and state efforts to improve performance, promote innovation, and expand credit transfer. The issue became more acute as students increasingly began earning credits at multiple higher education institutions and through many different types of delivery systems, putting additional pressure on the system to recognize and grant transfer of credit.

On October 17, 2005, Secretary Margaret Spellings announced the formation of the Commission on the Future of Higher Education. The Commission was created with the goal of launching a national dialogue on the future of higher education and called for an examination of how we can get the most out of our national investment to ensure that our higher education system continues to meet our nation's needs for an educated and competitive workforce in the 21st century. The Secretary asked the Commission to focus on four key areas in its work: accessibility, affordability, accountability, and quality.

Given the critical role of accreditation in assuring quality in higher education and providing a gateway to federal and state funding, as part of its national dialogue, the Secretary of Education's Commission on the Future of Higher Education, reviewed the system of accreditation and sought input from the accreditation community and other higher education

stakeholders to determine if accreditation should change and possible strategies to affect change.

The review and discussion centered around three major issues:

Assuring Performance. Should the accreditation system be held more accountable for assuring performance in accrediting institutions and programs? There has been a long-standing debate on the whether accreditation should be accountable for assuring performance to the government and the public that higher education institutions and programs are effective in achieving results and to report valid and reliable information on their performance to the general public. However, there was no agreement on how this proposed requirement in accreditation would be linked to existing federal and state reporting requirements including state performance accountability systems.

Open Standards and Processes. Should accreditation standards and processes be changed to be more open to and supportive of innovation and diversity in higher education, including new types of educational institutions and new approaches for providing educational services such as distance learning? The second set of issues and questions related to how accreditation standards and processes could be changed to be more open to and supportive of innovation and diversity in higher education including new types of educational institutions and new approaches for providing educational services such as distance learning.

The accreditation system in the United States was originally designed to recognize and support diversity in institutional mission and structure for traditional place-based educational service delivery. However, some believed this system had not been sufficiently updated to promote the growing diversity in types of educational institutions, especially new approaches to educational service delivery such as distance learning. They also questioned whether traditional standards and processes allow for innovations that have the potential to improve access and performance and reduce costs within both traditional and non-traditional educational institutions.

Consistency and Transparency. Should accreditation standards and processes be made more consistent to support greater transparency and greater opportunities for credit transfer between accredited institutions? The third set of issues and questions addressed

whether accreditation standards and processes should be made more consistent to support greater transparency and greater opportunities for credit transfer between accredited institutions. The accreditation system in the United States has a very decentralized structure that reflects the diversity in the types and missions of higher educational institutions and programs in the United States. This had long been considered a major strength of the current system. However, some argued that the decentralized structure of accreditation was not consistent with the growing national and international scope of operations of higher education and posed major problems in establishing standards and processes for quality assurance.

Following the release of the commission report, we continued the dialogue with hundreds of key higher education stakeholders at two national and five regional summits, numerous town hall meetings with students and families, and an accreditation roundtable and forum. A number of recommendations to address accreditation's role in quality assurance were identified by the participants.

Of those, the following two are especially relevant for the purposes of this paper:

1. Align accretitor, state and federal requirements for measuring and reporting performance and processes to increase economies of scale and efficiency while reducing redundancy; and
2. Design a process for developing a quality assurance framework.

Current Environment and Debate

It is important to frame this discussion within the broader context of the changing higher education environment and the national quality assurance system that includes the federal government, states and all accreditors. Accreditation cannot be disconnected from other public and private systems that address accountability and the protection of the public interest. Especially, as students are becoming increasingly mobile and institutions such as ours operate in a national market. This is especially true given the expansion of distance education programs operated by both public and private institutions and new entrants to the market.

As we look at the current environment, there are at least five major developments placing pressure on the current system. First, concerns over the United States' ability to compete

globally and maintain the quality of our higher education system are mounting. A robust higher education system is critical to the future economic competitiveness of the United States and provides the major pathway to economic success for students and workers. Second is the growing demand for higher education, especially from non-traditional or the new “contemporary” student who wants even greater options in the delivery of high-quality higher education.

A third development centers on reduced public funding, rising costs and pressures to find more cost-effective solutions in every aspect of higher education. Rising costs and reduced federal and state funding are pressuring higher education institutions to increase affordability and improve the value of and returns on higher education. Shrinking resources for higher education also demand that funds are used wisely and to the benefit of the public interest.

Fourth is the growing demand for increased accountability and the shift from access to success with an emphasis on education and employment outcomes. The government, consumers and the general public are calling for increased transparency and reporting of consumer-friendly information relating to the performance of higher education. While there have been significant efforts by accreditors, states, and institutions to include new accountability requirements, a tremendous disconnect still exists. This disconnect is manifest in the varying requirements between state accountability systems and among various accrediting bodies, among the different states regulators, and between the Department of Education.

Finally, there is the changing structure and delivery of higher education including new types of educational institutions and the increasing use of distance learning that allows institutions to operate on not only a national but a global scale. The traditional boundaries of geography, academic disciplines and programs, and modes of delivery are blurring. Students are now attending multiple educational institutions and utilizing different delivery systems, often simultaneously. The National Student Clearinghouse Research Center (2012) published a report that found that one-third of all students transferred at least once during their college experience. These new realities require new solutions to ease the transfer process.

While most states have now established performance-reporting systems for higher education that address one or more performance measures, it is important to note that these performance accountability systems and related state regulatory systems (e.g., program approval, proprietary

school certification, distance education authorization) represent another layer of quality assurance in higher education that is largely disconnected from and inconsistent with the quality standards and processes used in accreditation and by the federal government.

At the federal level there has been an increase in the number of regulations and disclosures required by institutions, but the information is often difficult to find, the measures use different definitions and the data are not required of all institutions, thus impeding their value in helping students make informed decisions.

In terms of the use of measures as the basis for quality assurance, having federal and state agencies and accrediting bodies establishing different measures does not result in transparency or better consumer information especially for non-traditional students. As many students compare and enroll in programs at institutions serving national markets, especially programs offered through distance education, differing data requirements and measures with varying levels of data quality on a limited set of institutions can create more confusion and can actually mislead not inform consumers.

Many accreditors have shown leadership and made significant strides in working collaboratively with institutions to define and assure quality – a role they are uniquely qualified to play. Yet over the years, additional responsibility and burden have been placed on the accreditors to enforce compliance with regulations that in some cases are not directly related to issues of institutional quality or integrity.

The April 2012 report from the NACIQI to Secretary Arnie Duncan providing advice on the reauthorization of the Higher Education Act noted that “This complex system has been admirable in many ways in addressing the needs of quality assurance in a dynamic and diverse environment. However, new challenges and the multiplicity of actors and issues pose a number of tensions, points of confusion, and areas of overlap.”

The NACIQI recommended the following to address both the overlap and gaps in responsibilities among members of the triad:

- Clarify and articulate common understandings about the responsibilities of each member of the triad.
- Coordinate/increase communication among actors to achieve greater commonality across the quality assurance/eligibility enterprise. Increased communication among the members of the triad may identify common concerns and shareable data.

- Encourage the states' engagement with consumer protection and investigation, whether within or outside the processes of accreditation.

The fact that almost 10 years later there is still a need to clarify the roles and responsibilities of members of the triad is in and of itself a reason to move forward with this recommendation. While there appears to be growing recognition and some degree of support among the various stakeholders for promoting collaboration and coordination among the three members – there is concern over who should be the convener. More specifically, there is resistance to the federal government directing the coordination and forcing consistency of any criteria or standards that are used for the purposes of quality assurance.

Recommendation for a New Quality Assurance Framework

Over the past 25 years we have explored various approaches and strategies to addressing concerns with the quality assurance system in this country. These approaches have included new grant priorities and opportunities, negotiated rulemaking, and leveraging privately funded programs and initiatives. Unfortunately, these disparate efforts have not been done at the scale necessary to achieve major impacts.

Many agree, that the federal government's role in bringing about those changes must be limited, but also that actions by individual accreditors and states -- even if more of them were to occur -- are unlikely to produce enough coordinated progress to get the job done. Lots of individual colleges, associations, states and accreditors have shown leadership in various ways, but agreement is broad that much work remains to be done. Unfortunately, there is far less agreement about how and who should take leadership for addressing the many challenges.

The emerging higher education accountability agenda proposed by the Administration and supported by NACIQI provides an opportunity to coalesce around these isolated efforts and build national capacity to promote and assure quality and accountability of higher education.

It is important to retain the relationship between accreditation and the institutional eligibility process to support and promote current efforts to improve educational quality and integrity. For this option to be viable, a collaborative approach is needed to rationalize the quality assurance system through the development of a quality assurance framework. The framework would clarify roles and responsibilities and include the data required by each member of the triad in

order to assure quality of higher education and meet the interests of all key stakeholders – students, employers, institutions, state and federal policy-makers.

This concerted, coordinated national not federal strategy to bring disparate sometime conflicting efforts together would require adherence to the following principles:

- The process must be out of arms reach from government;
- All stakeholders must have an equal voice;
- It must be an open and collaborative process; and
- It must be flexible to support innovation and improvement efforts.

One such approach for consideration is the use of the American National Standards Institute (ANSI) as the convener utilizing their established process for creating broad-based coordination and collaboration. A number of other federal agencies work with ANSI and routinely adopt voluntary standards for regulatory purposes under authority outlined in OMB Circular A119.

To help advance a coordinated approach to developing a quality assurance framework, the US Department of Education could engage ANSI to launch a Higher Education Quality Assurance Coordination Collaborative (HEQACC). The HEQACC would provide a neutral forum to promote engagement and broad-based coordination among all members of the triad and key stakeholders.

The established process that ANSI would follow in launching the HEQACC would be to first seek input from a broad set of stakeholders to assess how the collaborative could best help to support the development of a new quality assurance framework for the United States.

Based on input received at the meeting, additional stakeholder outreach, and subsequent advisory meetings, the HEQACC would then create a mission, scope, deliverables, and structure for the endeavor.

The multi-phase process typically used by ANSI would begin by assessing the current quality assurance landscape, develop a roadmap and compendium, identify gaps in existing quality standards/criteria, potential conflicts, and overlaps and barriers. The HEQACC would not develop the standards or criteria for quality assurance, nor would it assign responsibility for their development. Instead, the HEQACC would advance awareness of individual activities being advanced by the various organizations and members within the triad with the objective of moving the development of the quality assurance framework forward.

For example, the HEQACC would not displace or duplicate existing work underway by any of the members of the triad or NACIQI. Instead, it would begin by promoting more transparency in the criteria used by the stakeholders in their existing quality assurance processes and through an open, deliberative process seek to standardize the criteria and language – with all stakeholders having an equal voice in the process (e.g. criteria used describe the status of institutions).

In conclusion, the solution lies in a national not federal strategy that creates a neutral forum and provides every stakeholder an equal voice in developing a quality assurance framework that respects the role and expertise of each member of the triad with the goal of assuring educational quality and consumer protection.

Again, thank you for the opportunity to continue the dialogue with NACIQI on the role accreditation plays in the triad and to offer my suggestions on how to improve the quality assurance system in this country as part of the reauthorization of the Higher Education Act

Respectfully submitted,

/s/

Vickie L. Schray
Senior Vice President
Regulatory Affairs and Public Policy
Bridgepoint Education

Council of Regional Accrediting Commissions

May 30, 2014

Middle States
Commission
on Higher Education
MSCHE

TO: accreditationcommittees@ed.gov

New England
Association of Schools
and Colleges
Commission on
Institutions of Higher
Education
NEASCICHE

SUBJECT: **Comments to “Advancing Quality Assurance in
Higher Education”**

Higher Learning
Commission
of the North Central
Association of Colleges
and Schools
HLCNCA

On behalf of the Council of Regional Accrediting Commissions (C-RAC), I am pleased to have this opportunity to respond to the May 7, 2014 Federal Register notice inviting third-party comments on the question of “what issues are critical to consider in advancing quality assurance in higher education?”

Northwest Commission
on Colleges and
Universities
NWCCU

While this letter touches on just a small handful of issues relevant to this topic, we look forward to expanding on these comments in future discussions. In particular, we are pleased to have been invited to participate in NACIQI’s upcoming June meeting where we will have the opportunity for additional dialogue related to advancing quality assurance.

Southern Association
of Colleges and Schools
Commission on Colleges
SACSCOC

Key issues:

Accrediting Commission
for Community and
Junior Colleges,
Western Association of
Schools and Colleges
ACCJC/WASC

1. Sustaining Quality Assurance While Promoting Innovation

WASC Senior College
and University
Commission
WSCUC

Innovation has changed the landscape of higher education in dramatic ways. It has led to new opportunities for students to access higher education; improved strategies for teaching; and has driven us to rethink how “success” is measured when it comes to student learning. Accreditors have worked hard to be responsive to such innovations while assuring institutions maintain appropriate levels of quality in innovative programs.

However, this innovation is often met with federal policy that creates an ambiguous landscape for progress. For instance, while working with direct assessment/competency-based education that looks at competencies rather than structured courses, the academic community has had to balance the need to review

innovation against what is encompassed in recent regulations defining “credit hour.” The federal definition is based on a traditional class hour that, with the proliferation of distance education, has changed significantly over the years, adding confusion around efforts to expand these types of programs.

More recent regulations related to state authorization and distance education raise similar concerns regarding the impact on innovation. It is important for there to be a better understanding of how such regulations impact innovation and how the Department could work with accreditors and institutions to promote innovation in ways that do not hinder quality.

This challenge might be addressed through demonstration or pilot programs that would accommodate institutional innovations. For example, the Department could provide flexibility for accreditors for approving certain new programs for institutions interested in experimenting with alternatives to the regulations defining a credit hour. Such pilots could demonstrate how this could be accomplished in ways that benefit students by shortening the time to obtain a degree as well as reducing the cost.

2. There must be a broader conversation on the issue of “quality,” specifically around questions of “who” should define quality and “how.”

In the context of advancing “quality assurance” in higher education, it is important to highlight there is no single definition, data point, metric, or standard for what constitutes “quality.” Nor should there be, particularly at the federal level. The diversity of institutions is valuable and valued in the United States. Each institution of higher education is unique as reflected by mission, student body, and resources. In the context of quality assurance, this uniqueness is a critical factor in assessing how an institution defines and achieves its goals, particularly with respect to student learning.

Accreditation, driven through a self-assessment and peer review process, must continue to be the primary force behind recognizing quality in the context of all of these factors. Such processes not only identify instances in which an institution is not living up to expectations, but also reflect the reality that all institutions have room for improvement and must continually set higher goals for what constitutes quality.

3. There must be clarity in the roles of the actors in the Higher Education Triad so that there is no overlap of responsibilities and expectations.

As we have highlighted in prior communications with NACIQI, we continue to believe there needs to be more clarity in the roles and responsibilities of the “Triad” that is composed of the U.S. Education Department (ED), state agencies,

and accrediting agencies. We have become increasingly concerned with the drive by the ED to expand the role of accreditors from that of assuring quality and institutional improvement to that of a regulatory enforcer and compliance arm of the federal government. The latter is not an appropriate role for accreditors.

The responsibilities of the Department of Education and accreditors, as well as the role of states, particularly in the area of institutional licensure and consumer protection, are worthy of continued discussion by NACIQI in the context of reauthorization of the Higher Education Act. Regional accrediting agencies are eager and willing to be a full participant in such discussions.

4. There must be a focused and thoughtful review of current federal regulations impacting the work of accreditors and the extent to which rules and requirements detract from the ability of accreditors to advance quality assurance.

Increased regulation has been a growing issue for all accreditors. The area of substantive change is one of the most burdensome aspects of the regulations for agencies. The current expectations are unreasonable and Department of Education officials are at times, inconsistent in applying the regulations. For instance, if an institution moves an existing location to a nearby site, ED may request a letter of approval for a new location when all that is really needed is an updated address. Similarly, ED asks for copies of letters that they expect an agency to have regarding the review of institutional changes that occurred many years ago, when the changes may have occurred years ago under different regulations with no requirements for reporting/approval, or when the changes had already been reviewed as part of an institution's recent comprehensive review, and therefore no separate letter exists.

These and other examples may be viewed by some as having little to do with the question of "advancing quality assurance." However, these additional burdens placed upon accreditors do not result in a net benefit but instead represent increased costs for our agencies and institutions and act as a hindrance toward our goal of advancing quality assurance.

5. The size and complexity of higher education today demands the ability to have access to high-quality, reliable, and relevant data to make valid judgments related to quality assurance.

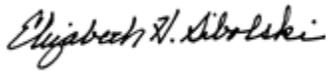
There is widespread agreement and understanding that the Integrated Postsecondary Education Data System (IPEDS) - the main source of institutional data collected at the federal level - is insufficient to reflect the current reality of higher education in the United States. For example, the graduation and completion data collected through IPEDS fail to capture large numbers of students, particularly in certain types of institutions. To make judgments about

value or quality based on such incomplete data is not in the best interest of institutions, students, or the public.

While we acknowledge current efforts of the Department to improve the collection and quality of data, we are concerned about how such data would be utilized. Specifically, the use of currently available data for the development of a national college rating system fails to acknowledge that quality assurance does not and should not rest solely on a handful of simple metrics and indicators. Instead, determining what data are collected and how they are used could best be accomplished through a continuing collaborative effort in concert with institutions and accreditors. In following a collaborative path, we may be able to identify appropriate metrics and the context (including institutional mission, student population, institutional resources, etc.) in which they could be used by students and the public to gain a better understanding of our institutions of higher learning.

Again, we thank you for this opportunity to provide input on advancing quality assurance in higher education and C-RAC looks forward to continuing to work with NACIQI on this critical issue.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth H. Sibolski".

Dr. Elizabeth H. Sibolski
Chair, Council of Regional Accrediting Commissions

competent performance on quality indicators as is given to those that might be fragile, unstable, low-performing, rapidly expanding or changing or newly-approved.

The Committee then went on to call for the “design (of) systems of expedited review.” (*Higher Education Act Reauthorization, Accreditation Policy Recommendations*, Recommendation 10, p. 6) The substance of this recommendation has been endorsed by other experts. At a hearing of the House Education and the Workforce Committee in June 2013, Kevin Carey of the New America Foundation offered a similar observation, proposing: "Accreditors should reduce the burden on institutions that succeed in serving students well while placing greater scrutiny on less-successful colleges, including plans for stronger monitoring, meaningful improvement plans, and a clear timeline for eligibility loss." A recent Task Force of the American Council on Education on Institutional Accreditation noted that “[l]ong-established institutions with a consistent record of high performance may not require the same in-depth review as those that have not demonstrated a strong record of success.”

The risk-adjusted scrutiny called for by NACIQI and others is a standard and, indeed, indispensable regulatory practice. For example, when we perform biological research, the safety standards appropriate to any given laboratory depend on the kind of research that is conducted there. The regulatory variations recognize that safety investments have to be tailored to the kinds of dangers or harms that are likely to arise.

The first step in implementing a system of expedited review is to identify criteria that can be used to demonstrate that an institution presents a low level of risk with respect to the kinds of harm against which the accreditation process should protect. If students are consistently leaving a college without degrees or jobs or graduate/professional school placements, with high default rates, and with low levels of satisfaction, there is reason to question whether that college is meeting the needs of its students. Conversely, if a college meets these and other criteria set forth in the **attached draft legislative proposal**, it ought to be able to go through an expedited process, and do so at less frequent intervals. Allowing for expedited review would reduce costs for institutions that meet the identified criteria and thus present low levels of risk, while allowing the accreditors to focus their time and resources on addressing and ameliorating real risks to educational quality.

The draft proposal seeks to ensure that accreditors develop and implement expedited review procedures for institutions with a record of stability and successful performance. We propose that the Committee endorse an amendment to the Higher Education Act that would require that each accreditor, as part of the certification or recertification process for accreditor status, demonstrate that it is implementing a system of expedited review.

We also endorse efforts to review all the statutory and regulatory provisions relating to accreditation and to apply a cost-benefit assessment that would aim to focus accreditors’ attention and limited resources on the institutions that are of greatest concern to the federal government. NACIQI’s report recommended that accreditors measure their requirements against “reasonable cost-benefit standards, in which regulatory obligations, effort and cost are consistent with the results in terms of important protections and quality control.” The report recommended “substantial modification to the existing statutory and regulatory criteria, and their application, to

make them where possible less intrusive, prescriptive, costly and granular while maintaining the essential controls of gatekeeping.” (Recommendation 12, p. 6)

We want to emphasize that Princeton University is fully committed to the highest standards of quality and to continual improvement. This should go without saying, but our encouragement of expedited review is sometimes misunderstood. The purpose of expedited review is not to allow institutions to escape scrutiny, but to allow them to demonstrate that they meet standards that attest to the effectiveness of their performance in accordance with their missions and resources. We recognize that somewhat different standards may be appropriate to institutions with different missions, which is why we have raised the question of whether a time may come when the accreditation process should be organized by sector rather than by region (a carryover from times when transportation and communication limitations argued strongly for a regional structure). At this point, however, we believe the right next step is the adoption of an expedited review process along the lines of the draft proposal that follows.

Measuring Student Achievement

We believe the Commission could make an important contribution to the current discussion on accreditation by endorsing an approach to measuring student achievement that is based on a culture of learning and engagement.

Federal law requires institutions to provide evidence of “success with respect to student achievement in relation to an institution’s mission.” Both aspects of this requirement—the insistence upon achievement and the tailoring to mission—are critically important. The provision of quality education is a fundamental responsibility of all colleges and universities, but both the achievement of that quality and the methods used to measure it will differ depending on the mission of the institution.

There is clear evidence that the variable most critical to learning is genuine faculty and student engagement (for example, faculty-student contact, faculty-guided research projects, class participation, hours spent studying, and so on). For this reason, we support a system in which institutions should be expected to provide evidence of student success in three areas. First, all institutions should demonstrate evidence of student learning. They should be able to describe and evaluate how their students are learning. Second, institutions should be able to document their students’ academic performance; they should be able to define meaningful curricular goals and should have defensible standards for evaluating whether students are achieving those goals. Additionally, consistent with their missions, institutions should be able to articulate how they prepare students for successful careers, meaningful lives and, where appropriate, further education. Institutions must be allowed flexibility with regard to the methods for measuring progress towards these goals.

This approach, which has been endorsed by all the accrediting institutions and the Association of American Universities, differs from the assessment movement that is fashionable with some who evaluate and study accreditation, including testing contractors. That movement tends to focus on an insistence on evidence that can be externally benchmarked and on creating a culture of assessment, rather than one of learning and engagement. This misguided focus on

external benchmarking and pervasive assessment leads inevitably to measures of learning that either consist of, or are similar to, standardized tests. Such measures are inconsistent with the federal statute's entirely appropriate emphasis on "student achievement in relation to the institution's mission." Standardized measures ignore the legitimate diversity among institutional missions (for example, Julliard, Caltech, and Princeton have significantly different missions), across the missions of departments and courses within universities, and across students. They create an environment that encourages "teaching to the test." And they undervalue the real outcomes most important to students and parents, such as better jobs, more fulfilling post-graduation lives and high levels of engagement while at college. Indeed, parents and students come to college with an explicit aversion to the standardized testing regimes they have endured throughout their schooling.

Thank you for the opportunity to provide these comments. We are available to assist the Commission in any other way that might be helpful.

Proposal for Expedited Review

Section 496 (c) of the Higher Education Act of 1965 is amended as follows:

At the end of paragraph (c) (9) insert the following:

“(c) (10) Demonstrates that it has in place a process for affording institutions an opportunity for expedited review. Notwithstanding any other provision of law, such process shall:

- i. Include standards relating to each of the elements set forth in paragraph (a) (5) of this section that are appropriate for a process of expedited review. With respect to the requirements of paragraph (a) (5) (A), the agency shall base its standards on high performance in each of the following categories: graduation or completion rates; post-graduation outcomes, such as job placement and graduate school/professional school acceptance rates; alumni satisfaction data; and low student default rates. The agency shall utilize the most inclusive graduation rates available, with particular attention to transfer and part time students. The agency’s process shall provide that an institution may meet the requirement for high graduation or completion rates by demonstrating significant progress in completion or graduation rates each year for a period of 10 years.
- ii. Ensure that any institution eligible for expedited review: has been accredited for at least 10 years; has not undergone a change of control, structure or organization within the last five years; has not been under sanction or related agency action within the last five years; does not have a history of extensive monitoring by the agency, including accreditation cycles shortened to seven or fewer years, multiple monitoring reports, and multiple focused visits extending across more than one accrediting cycle; has not been undergoing significant changes in enrollment or student body size or composition, or opening or closing of multiple locations or campuses or taken other actions requiring frequent substantive change approvals since the last comprehensive evaluation; and has not been the subject of significant and demonstrable concerns by the agency relating to circumstances or developments at the institution (e.g. frequent leadership turnover, extensive review by a governmental agency, patterns identified in financial and non-financial indicators).
- iii. Require that an institution prepare an in-depth self-study based on areas that the institution and agency agree constitute areas for institution improvement. Such report shall be reviewed and approved by a peer review panel selected by the agency. No further review shall be part of the process.
- iv. Provide that institutions qualifying for expedited review be reviewed every 15 years, with interim reviews occurring every seven years.”



May 20, 2014

Carol Griffiths, Executive Director
National Advisory Committee on Institutional Quality and Integrity
U.S. Department of Education, Office of Postsecondary Education
1990 K Street NW., Room 8060
Washington, DC 20006
Carol.Griffiths@ed.gov

Ms. Griffiths:

The Association of Specialized and Professional Accreditors (ASPA) is pleased to respond to the National Advisory Committee on Institutional Quality and Integrity request for position papers or other commentary from leaders in higher education accreditation addressing the question, "What issues are critical to consider in advancing quality assurance in higher education, going forward?"

ASPA is a member organization that provides a collaborative forum and a collective voice for the community of accreditors engaged in quality assurance of specialized and professional (or programmatic) higher education programs, schools and in some cases single purpose institutions. We are the largest association of accreditors, with 60 members, 34 of which are recognized by the U.S. Secretary of Education.

The attached position document - **Recommendations for the Reauthorization of the Higher Education Act** - articulates concepts that we believe are important to consider and incorporate in the development of legislation.

We appreciate the opportunity to provide input. Please contact us for any additional information or clarification.

Sincerely,

A handwritten signature in black ink that reads "Joseph Vibert" with a stylized flourish at the end.

Joseph Vibert
Executive Director



Recommendations for the Reauthorization of the Higher Education Act

Accreditation is the quality assurance process by which institutions and specialized programs within those institutions are evaluated. These processes are directed at ensuring that colleges and universities serve the interests of the public and are accountable for the expenditures of funds from governmental agencies. Accrediting organizations and the federal and state governments (the Triad) share responsibility in ensuring quality in education and accountability.

Accreditation occurs at the level of the institution (regional and national accreditors) and at the level of the program (specialized and professional accreditors). Specialized and professional accreditors closely examine and evaluate measures of learning or competence that are fundamental to a specific discipline, focused study or profession (e.g. dentistry, religious studies or engineering). Because of their integral relationship with the professions they serve, specialized accreditors play a critical role in ensuring the health and safety of the public by defining standards that require students to demonstrate competence for entry to licensed or professional practice.

In recent history, institutional and programmatic accreditation has been subject to increasing levels of federal oversight. As a result, the central purpose of accreditation - a rigorous process of quality assurance and self-improvement for institutions and programs - has been overtaken by the need to provide assurances to the U.S. Department of Education (USDE) that Title IV funds are being appropriately expended. The USDE now relies on accreditors to serve as the gatekeepers for the expenditure of these funds and, in turn, through its recognition process, prescribes much of what accreditors do. The extensive USDE regulatory guidelines are, in part, a compliance checklist, with little relation to the actual quality of the accreditor or to the programs and institutions reviewed for accreditation.

The Association of Specialized and Professional Accreditors (ASPA) believes that it is possible to balance institutional autonomy, evaluating the academic preparation of entry-level professionals, and accountability for the expenditure of public funds. The reauthorization of the Higher Education Act (HEA) is the time for clearly defining the responsibilities of each member of the Triad. Within that context, ASPA offers the following considerations for the reauthorization.

Principles

- 1. Institutions, programs and accreditors make academic decisions, set standards, and define educational quality;*
- 2. Student achievement is best determined by institutions, programs, and accreditors in partnership with communities of interest;*
- 3. Professional judgment, peer review, and contributions of communities of interest ensure quality in education;*
- 4. Public information about accreditation decisions should serve the public good and allow for quality improvement in higher education; and*
- 5. Specialized and institutional accreditors serve different purposes.*

1. Academic decisions, standards, and educational quality

Requirements for recognition should be streamlined to reduce regulatory burden and allow accreditors to focus on assuring quality and performance improvement.

Accreditors and institutions are best suited to make academic decisions that focus on quality assurance and improvement. The recognition process of the USDE and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) should focus on the review of accrediting agencies against established requirements for recognition. This committee should not extend its mandate to include developing policies on the measures of quality and competency for entry-level practice in a given profession. This is the responsibility of each profession, the specialized and professional accreditor, and the publics they serve.

Accreditors promote innovation while assuring quality - additional regulation is unnecessary. A core value of specialized and professional accreditation is to assure and promote the highest quality in educational programs that prepare competent professionals to practice in their respective professions. Each profession recognizes that practice environments are constantly evolving and thus the competencies required for practice must keep pace with these changes. Specialized and professional accreditation supports innovation while assuring that programmatic quality is maintained. Some examples of how accreditors support innovation include:

- medical education accreditors are working with the American Medical Association to accelerate improvements in medical student education;
- accreditors are embracing innovative curriculum delivery as a way to reduce the cost of education and increase access to professional education, including online courses, prior learning assessment and competency-based education; and
- teacher education accreditors offer different pathways to expand innovative practices in preparation of effective teachers. One pathway focuses on continuous improvement on a particular standard such as program impact.

Specialized and professional accreditors weigh the benefits of any educational innovation with the student outcomes achieved, thus ensuring student competency and quality education. As such, innovative practices are supported that reduce the costs of accreditation while assuring quality is maintained for the learner.

The accreditation review process can be flexible. Language in the HEA and corresponding regulations should not restrict the ability of specialized and professional accreditors to accommodate innovation that allows for flexibility in the accrediting process. Typically, no single measure allows for a determination of quality - the accreditor must ensure compliance with all standards. However, accreditors allow flexibility in the manner in which standards are met, in order to accommodate innovative and effective program delivery. Decisions about acceptable processes are made by the accreditor in consultation with the profession, with recognition of the responsibility to protect the public interest.

Specialized and professional accreditors understand the concerns regarding the increasing costs of higher education. Costs should be understood in relation to the benefits to society and to individual learners entering a profession. Specialized and professional accreditors promote value in relation to societal benefits and costs while assuring that programs maintain high quality standards. Increased regulatory requirements lead to increased costs for both accreditors and the programs they accredit.

Accreditors regularly evaluate processes and standards in relation to benefit and cost considerations, and make changes as appropriate. For example:

- the size of the team and the length of site visits are structured for efficiency and effectiveness;
- some accreditors provide accreditation pathway choices; and
- more and more accreditors are providing electronic resources for programs and allowing online submission of documents to eliminate costs associated with hard copy preparation and distribution.

2. Student achievement

Requirements for recognition should respect identification of student achievement outcomes that are meaningful to the profession as determined by the accreditor and communities of interest.

Outcome measures are specific to the profession. The goal of specialized and professional accreditation is to ensure entry-level competency of graduates for professional practice by collecting meaningful profession-appropriate outcomes measures. With input from the professional workforce and the public, specialized accreditors have the unique ability to set and assess quality measures within diverse institutions and regional environments. With advances in technology and research, accreditors revise data collection to ensure that it is meaningful in the assessments of program quality. Specialized accreditors consider a broad range of indicators consistent with the institutional mission, which may include licensure pass rates, externship evaluations, community-based projects, professional publication rates and juried performances, as appropriate.

Determination of the quality of a professional education program is more complex than what can be demonstrated by a single set of easily measurable quantitative indicators applied across all programs for all disciplines. Using only the types of measures currently under consideration by the USDE risks oversimplification and may mislead students and parents, for example:

- graduation rates must be understood within the context of the institution and program and the goals of the students;
- earning potential is not a measure of student competency or societal contribution – teachers, social workers and other professionals contribute greatly to society, but typically earn lower salaries;
- time to degree completion carries little meaning in full-time professional programs, particularly at the graduate level, as the length of programs vary, based on the profession; and
- employment rates must be considered in the context of the need for services provided by individuals in the specific professions, geography and prevailing economic conditions for the specific profession or discipline.

3. Professional judgment and peer review

Requirements for recognition should reflect the value of peer review in protecting the public interest.

Peer review is an essential component in setting and maintaining quality standards for the professions. Peer review in the accreditation process has been criticized by some – but review by experts in the field of study is fundamental in protecting the public interest. Peers in the profession – educators, practitioners and representatives from the profession – perform site visits, participate in the accreditation decision making process and contribute to the development and revision of standards. This has been a core value of accreditation practice since the early 20th century.

Peers are typically unpaid volunteers - and volunteerism is a critical professional investment to promote fundamental aspects of and best practices in the profession. Accreditors carefully vet reviewers to ensure that there not be a perception of a conflict of interest. All reviewers undergo intensive training to ensure that they consistently and carefully apply accreditation standards while bringing their own professional expertise to the process.

4. Public information

Requirements for recognition should reflect public access to information about the accreditation status of programs and student achievement that is relevant to the profession.

Students should have access to useful information. Institutions should publish, in plain language, and in an easily accessible location, the accreditations that the institution and its programs hold. Specialized and professional degree programs should similarly publish information about student success that is easily interpretable by the public and meaningful to the profession.

Useful public information varies among disciplines and should be determined by the profession in consultation with communities of interest and the public. A single definition of student achievement is not useful or meaningful to prospective students.

5. Specialized and institutional accreditation

Requirements for recognition should reflect the fundamental difference between specialized and institutional accreditation.

Specialized and institutional accreditors serve different purposes. In order to maintain the essential role of the specialized or professional accreditor and ensure protection of the public, it is important that regulatory language distinguish the separate roles of institutional and specialized and professional accreditation. There should be recognition of the reliance on institutional accreditors to make decisions regarding the overall stability and resources of an institution – and reliance on specialized accreditors to ensure that educational programs provide the public with qualified and competent practitioners who are educated to provide competent and professional service to members of the public and respond to evolution in professional practice.

About ASPA

A nonprofit association, ASPA provides a collaborative forum dedicated to assuring the quality of specialized and professional higher education programs and schools. It is the only unified, national voice that solely represents specialized and professional accrediting bodies in the United States. ASPA members set national educational standards for 100 different specialized disciplines and professions. They ensure students receive a quality higher education, consistent with standards for entry or advanced practice in a field or discipline. Through an emphasis on self-evaluation and peer review, accreditation plays an important role in continuous quality improvement in higher education.

In addition, ASPA:

- Facilitates collaboration among programs, institutions and accrediting organizations
- Promotes quality in higher education and accreditation through discussion, advocacy and educational offerings
- Encourages a focus on student learning and graduate competencies
- Advocates for the integrity, independence and autonomy of accrediting organizations and their affiliated institutions and programs

Each of ASPA's member organizations has a common commitment to uphold standards that are rigorous, comprehensive and outcome-based, with specific attention directed to the professional or special-purpose curriculum.



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