**CYoshitomi - Department of Education Regulatory Negotiations**

**Conference Agenda**

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**Topic 4:   DOE Regulatory Negotiations: Accreditation - Student Achievement**

The Department seeks advice from negotiators on how to ensure continuous improvement and rigorous outcomes, while at the same time avoiding one-size-fits-all solutions that fail to appropriately account for differences in institutional mission, occupational pathways, or the accountability that students have for their own success.

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| 1. | **Issue a Dear Colleague letter - Laura** One size fits all and bright lines have been required by the department staff in the past - those requirements were never specific in the regulations. Don't change the regulation - it remains appropriate - simply issue a letter explaining that these bright lines will no longer be required and that agencies are free to consider, as appropriate, mission, occupational pathways, etc. in their student achievement measures. Also clarify that qualitative measures are appropriate. In specialized accreditation, we focus on skill mastery, for example. This cannot always be measured quantitatively.  *Comments:*   1. I agree. Also, consider that demonstration of student achievement outcomes remains problematic for many institutions because of lack of access to data. We cannot meet brightline standards (or other standards) without additional consideration for access to data. Two that come to mind, and are government data sources, are the Student Record Data System, and wage data from the IRS. As we consider metrics for student achievement (whether existing or as we look for different metrics), I would ask that we also consider data sources and our access to them. |
| 2. | **Student Representation** It is a best practice at many universities, state university systems, and at the Department of Education to have a student(s) represented on trustee boards and committees. There are requirements to have public representatives on the board of accrediting agencies. I would like to propose for discussion that students have representatives on accrediting boards. From my understanding some accreditors do this already, but not all. Students are the primary stakeholders in higher education, and are the ones experiencing the programs and can provide consumer feedback in the process. The Department is seeking to include employer input in some cases of accrediting new programs. I would like to expand this to include student input as well.  -Joe |
| 3. | **Faculty** The core of the academy is the instructional staff (including researchers) and its influence/instruction/interaction with students. As an "industry", higher education needs to incent, provide opportunities and reward faculty who remain active in their disciplines, bifocally providing both basics and "cutting edge" information, delivery modalities, and credentials. More "job" oriented programs are currently in the ascendency, but provision must be made for the general education/liberal arts faculty whose offerings will enable students to be lifelong learners. I'm not sure what role regulation might play in this need, but encourage accreditors to work with their constituencies in this way to accomplish continuous improvement and rigorous outcomes. |
| 4. | **Student Representation Language 602.15 - Joe** Following up on my previous post, I am proposing language to 602.15 (4), adding "students" in addition to the Department's proposed language. Please let me know if there are other places in the regs that additional language would need to be added that corresponds with this inclusion. The goal is to include students, whom have first hand knowledge and recent experience with the kinds of programs being accredited, on accrediting boards in addition to the Department's proposal to add employers. Representatives of the public are already required to have seats.  602.15 (4)  Change: Educators and/or practitioners followed by a comma followed by "students"  Language: Educators and/or practitioners, students and employers on its evaluation, policy, and decision-making bodies |
| 5. | **Readings: please read http://download.hlcommission.org/initiatives/StudentSuccessDifferentiation.pdf/Gellman-Danley** HLC brought in an amazing group of national experts who subsequently wrote a brilliant paper on differentiation of types of students for student success. PLEASE take some time to read it. We are all over this; bright lines won't work. Neither does the one-size-fits-all solutions as is noted. I can imagine great changes in regional accreditation on this -- ONE THEIR OWN. |

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