

To: Department of Education

From: Laura Rasar King, representing Specialized Accrediting Agencies

Re: Proposal for 602.16(a)

§602.16 Accreditation and preaccreditation standards.

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if

offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the

quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if the following conditions are met:

(1) The agency's accreditation standards must set forth clear and effective expectations for the institutions or programs it accredits in the following areas:

(4) The agency's accreditation standards must set forth clear minimum expectations of performance that the agency must verify and enforce for the institutions or programs it accredits, including by using, where appropriate, consistent and reliable data, which may include Federal data. The accreditation standards must set forth minimum expectations in the following areas:

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs as established by the institution. Where feasible and appropriate, the agency's standards for success with respect to student achievement must—

(A) Identify minimum expectations of performance which may include, but are not limited to as established by the institution, including, as appropriate, consideration of State licensing examinations, course completion, and job placement rates. If the agency determines that setting minimum expectations of performance is not feasible or appropriate for the institutions or programs it accredits, or for any particular institution or program, or group of institutions or programs, its standards should explain why such minimum expectations are not required and clearly describe the agency's method for assessing and enforcing its standards for success with respect to student achievement;

Rationale: Minimum implies that a quantitative standard must be set. Enforcement is addressed in 602.20.

(B) Be developed and periodically reviewed and updated if necessary, using valid and reliable data, which may include data reported by the institution or program the agency accredits, Federal data that the agency determines is appropriate and applicable, or other sources determined by the agency and the institutions or programs that the agency accredits is useful in assessing student achievement; and

Rationale: It is important to recognize all potential sources of data that could be useful in assessing quality. In addition, this language should be moved to 602.21 where the regs address review of standards. This would move it away from the statutory prohibition on specifying standards related to student achievement.

(C) Include consideration and assessment of student achievement on a disaggregated basis, by categories that may include race, ethnicity, age, gender, socioeconomic status, first generation college student, and/or any other institutionally meaningful categories.

Rationale: This requirement is "specifying, defining or prescribing" standards that an agency must have. It should be deleted in its entirety.

- (ii) Curricula.
- (iii) Faculty.
- (iv) Facilities, equipment, and supplies.
- (v) Fiscal and administrative capacity as appropriate to the specified scale of operations.
- (vi) Student support services.
- (vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.
- (viii) Measures of program length and the objectives of the degrees or credentials offered.