

THE KEYS TO QUALITY:

Reforming Higher Education Accreditation Policy



Today's system of higher education isn't producing the quality and outcomes students need. Accreditation reform holds the key.

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May 2018

Surging tuition costs and questions about the value of college have left students, employers and the public wondering about the return on investment they receive from higher education. Taxpayers underwrite the nation's investment in higher education to the tune of approximately \$130 billion annually. Along with increasing questions about the value of higher education, student outcomes are uneven and sometimes unacceptable. At the crux of federal quality checks, accreditation is a complex, often misunderstood system used by the federal government to assure the quality of postsecondary education.

Modern accrediting agencies are an outgrowth of academic peer review consortia first organized in the late 19th century. The federal government has relied on accreditors asurers of institutional quality dating back to the Veterans Readjustment Act in 1952.¹ Today, institutional accreditors continue to operate as peer review consortia, but they are also the gatekeepers to billions of dollars of federal student aid. Unfortunately, federal policies ask these quality assurers to focus excessively on monotonous check-lists and compliance, instead of more meaningfully assessing the quality and pace of student learning and outcomes.

THERE ARE THREE MAJOR TYPES OF ACCREDITATION:

Regional

accredits entire colleges and universities, most of which are degree-granting and not forprofit. Each regional accreditor is responsible for IHEs in a designated region of the U.S.



National

accredits entire colleges and universities anywhere in the country, most of which have a single focus—such as career and technical education.



Specialized/Programmatic

accredits programs, departments, or schools within a college or university; generally this type of accreditation is not used to determine eligibility for federal financial aid.



¹<https://www.urban.org/sites/default/files/publication/93306/higher-education-accreditation-and-the-federal-government.pdf>



▶ THE CHALLENGE:

While accreditors are entrusted as gatekeepers to federal financial aid, current accreditation policy is not focused enough on learning and student outcomes. Accreditors do examine these issues, but their federally-mandated lens is often one of compliance and examining inputs unrelated to students—such as financial responsibility—rather than focusing on outcomes and the value of a postsecondary education. Over time, the federal government’s interest in accreditation has become almost completely conflated with compliance, meaning that any findings around outcomes and student improvement are often an afterthought. In addition, accreditors’ decisions are typically made behind closed doors without full transparency for students and other stakeholders.

▶ THE SOLUTION:

To offer all of today’s students a chance at economic success and upward mobility, American higher education needs a more transparent, agile and responsive accreditation system focused on student outcomes produced by institutions of higher education. The recommendations that follow can help achieve that goal.

PRIORITIZE STUDENT OUTCOMES OVER INSTITUTIONAL COMPLIANCE.

Accreditors are currently required to assess too many compliance checks and meet too many bureaucratic requirements. Instead, federal policy should encourage accreditors to place a greater focus on student outcomes. Students expect to receive a quality educational experience, strong outcomes and economic mobility in exchange for the high price of attending college. Accreditation must ask the hard questions, and the first step is ensuring that accrediting agencies focus their time and resources on the outcomes that matter to today’s students. Existing accretor standards on issues unrelated to student outcomes, such as financial stability, should become the responsibility of states and the U.S. Department of Education, the other two parts of the higher education “triad”.

THE HIGHER EDUCATION TRIAD

- 1** Approval, including an examination of an institution’s financial capabilities, by the U.S. Department of Education (ED)



- 2** Authorization to operate as an institution of higher education by the institution’s state



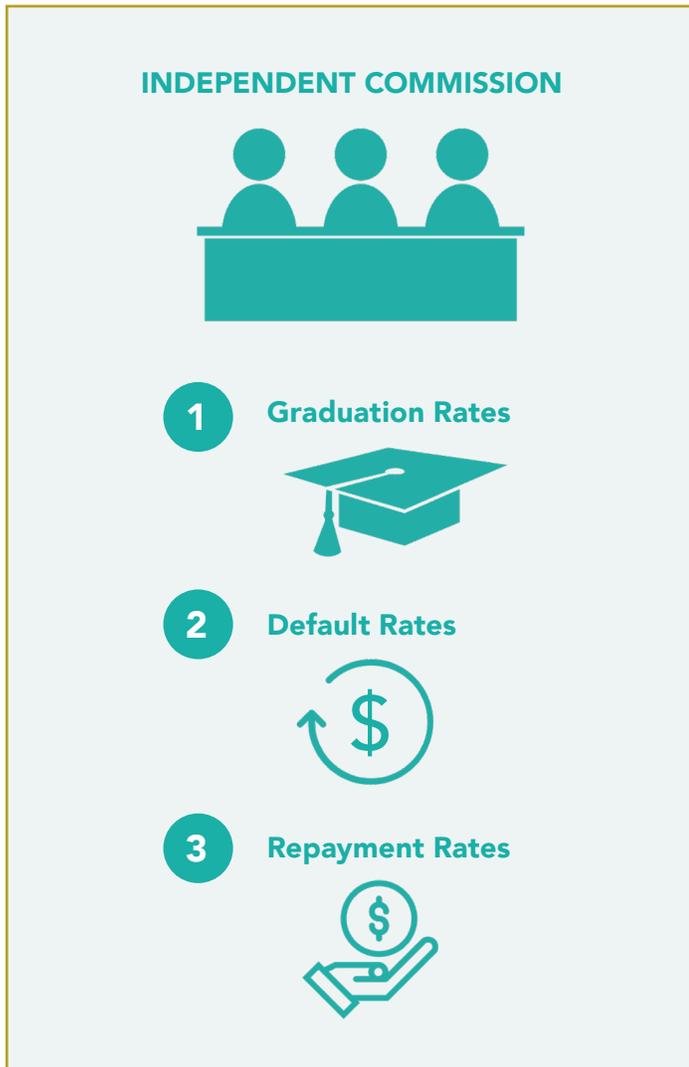
- 3** Institutional accreditation by an accretor recognized for these purposes by ED



Accrediting agencies are uniquely situated to assess specific student outcomes and currently take them into account during reviews to some extent. However, for the purposes of their federal gatekeeping role, accreditors should be required to assess institutions based on three specific student outcomes: graduation rates, default rates and loan repayment rates. These three outcomes demonstrate and lead to student success and return on investment—for students as well as taxpayers. Additionally, it is essential that accreditors continue to maintain clear standards in regard to student learning. The Higher Education Act currently prohibits the Secretary of Education from defining or evaluating student learning standards, and that prohibition should continue.

RAISE THE BAR FOR STUDENT OUTCOMES.

Currently accreditor standards and thresholds vary by accreditor, which can create confusion and inconsistency in the federal government’s oversight and assessment of institutional quality. In order to address this factor, the National Advisory Committee on Institutional Quality and Integrity (NACIQI)—an independent entity responsible for overseeing the federal accreditation recognition process—should establish an independent commission of experts to develop minimum thresholds of success for each of the student outcomes outlined above (graduation rates, default rates, and loan repayment rates). While accreditors should continue to be required to have standards around student learning, the standards and thresholds for that requirement should continue to be set by each accreditor.



As an advisory committee, NACIQI cannot directly create requirements or regulations. Instead, NACIQI should work with the commission to formally adopt the recommendations, and in turn, recommend the Secretary of Education implement the thresholds determined by the commission. The Secretary must regulate in order to have these thresholds take effect, ensuring the ability for public notice and comment. If, in the regulatory process, the Secretary initially makes changes to the recommended thresholds, the Secretary should be required to detail and justify any such changes. This process and outcome will not only ensure a minimum level of quality for today’s students, but also help to ensure that the \$130 billion annually invested by the federal government in higher education is used wisely.

Setting thresholds for a system as diverse and complex as the nation’s set of institutions of higher education will require many considerations. This committee-based approach would allow for the consideration of complex factors when setting thresholds, such as institutional missions and student demographics, while still ensuring that accreditation is focused on institutional improvement and student outcomes. Additionally, the committee could consider interim thresholds prior to removing eligibility for federal student aid, in an effort to drive institutional improvement.

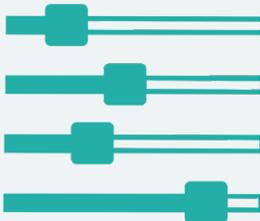
ENABLE ACCREDITORS TO USE A DIFFERENTIATED ACCREDITATION MODEL.

Accreditors must currently use roughly the same methods and models to assess and accredit all institutions equally, although certain institutions would benefit from more attention and assistance from their accreditor than others. Current policy does support the limited use of differentiated accreditation, and some accreditors have integrated the approach into their evaluation process. Differentiated reviews would enable accreditors to spend less time assessing institutions with long and demonstrated track records of high-quality outcomes and more time helping institutions with moderate or poor outcomes improve.

MAKE THE ACCREDITATION PROCESS MORE TRANSPARENT.

Accreditation actions and reviews too often occur outside of the public domain and discourse. As a result, this critical function and the opinions of accreditors are not transparent to students and policymakers. Accreditors should be required to post the following items online, via an easily-accessible site.

ACCREDITORS SHOULD MAKE TRANSPARENT:

- Standards** 
- Reports** 
- Information on student outcomes** 
- Criteria that triggers sanctions** 
- Specific sanctions taken with institutions who fail to meet those criteria.** 

While some accreditors already choose to take this step, not all of them do, thereby evading an important transparency commitment and depriving consumers of important information about quality. Accreditors should also be required to make such information public and work with institutions to notify students when there has been a change in the accreditation status of the institution students are attending.

ENABLE INSTITUTIONS TO RESPOND TO LOCAL WORKFORCE NEEDS MORE QUICKLY.

Often, colleges and universities need to move quickly to respond to or anticipate short-term workforce needs. However, the accreditation process is often so lengthy that it can interfere with institutions attempting to stand up new programs to meet the demands of a rapidly changing economy. Even creating a new program can trigger a “substantive change” review by the accreditor.

For example, if a new marine port is opening in a community, a city or county could decide to partner with an employer to offer a marine mechanics program and certificate. But it may take too long for the program to become accredited, and in order for students to take the course, they may have to rely on out-of-pocket funds. Unfortunately, this also will mean students will be participating in a non-credit bearing program. As a result, the credential they receive may not be transferable or translatable to other employers, at that institution of higher education or others, and the student will not be able to use federal student aid to pay for the program.

To address this problem, accreditors should be able to waive or expedite substantive change requirements in certain instances, when a new program is directly related to local workforce needs, an employer is involved in the program, and the program is at an institution in good standing with the accreditor. Should such a waiver or expedition be granted, a process should be established to intermittently review student outcomes at the institution.