

**DRAFT RECOMMENDATIONS TO INFORM ACCREDITATION POLICY
2014**

#1 Simplify the Process

1.1 Establish common definitions of accreditation actions and terms (both programmatic and institutional) and establish common procedures, timelines, process (i.e., electronic) among accrediting agencies include actions, due process and substantive change

The wide variance in accreditation terminology, processes, and timelines across accrediting agencies results in confusion and a lack of transparency and does not serve the public interest. The above recommendation addresses the need for more conformances in the accreditation process, such as more concise, factual self-studies and other final reports that are supported by technology, to better serve the public and provide more transparency to the accreditation process.

1.2 Require a periodic Departmental review of the criteria for recognition (regulations).

The Committee supports initiatives to evaluate and assess the impact of Departmental regulations (criteria and recognition procedures) on the accreditation process with the intent to streamline the regulations, eliminate duplication, and to minimize the regulatory burden.

TASK #2: Enhance Nuance in the Accreditation/Recognition Process

Overview: The recommendations made below are the result of a current review structure that is too rigid to adequately address the uniqueness of institutional missions. There is a need for a more differentiated process that allows for different levels of accreditation, for more transparency and openness in the accreditation and the recognition processes, and a more laser-focused emphasis on student achievement and student outcomes. Specific standards-setting authority within those mission essential areas lies expressly with the accrediting agency.

2.1. Establish that NACIQI reviews*, direct greater attention to assessing the role of an accrediting agency in ensuring the health and well-being and the quality of institutions of higher education and their affordability, rather than on technical compliance with the criteria for recognition.

(* supported by staff reports that focus on the effectiveness of the accrediting agency in performing its work, rather than technical compliance)

2.2 Toward that end, direct NACIQI to identify the essential core elements/areas of the recognition review process that accrediting agencies are required to take into account for recognition purposes, focusing of student learning and student outcomes, such as

- Grad rates of all institutions – four year and six year (understanding that this is an imperfect measurement),
- Licensure rates,
- Whether or not the schools employ nationally normed assessments and what those assessments show, and
- Number and type of institutions overseen,
- Demographics served,
- A listing of schools on any kind of sanction and reasons why.

The emphasis here is on critical elements that an accreditor is expected to assess with the expectation that accreditation will not assess on elements that are not essential to the achievement of those mission essential outcomes (student learning and student achievement) and will not infringe on the institutions' autonomy, particularly in areas such as governance or its social policies.

2.3 Establish that accrediting agencies are given greater authority to do the following:

- Develop standards tailored to institutional mission;
- Create different substantive tiers of accreditation; and
- Use different processes for different types of institutions, including expedited processes.

2.4 Establish that the recognition review process differentiate among accrediting agencies based on risk or need with some identified as requiring greater levels of attention, others lesser.

2.5 Establish that recognition recommendations/decisions include different gradations of approval of accrediting agencies and different recommendations as to the amount of time within which an agency is allowed to achieve compliance.

TASK #3: Develop the Relationship Between Quality/Quality Assurance and Access to Title IV Funds

3.1 Convert all accrediting agencies into national accreditors; eliminate the regional monopoly so that institutions and accrediting agencies may re-align themselves along sector, institution-type, or other more appropriate lines.

This will help to eliminate a two-tier system and to facilitate policies that help students such as transfer of credit.

3.2 Allow for alternative accrediting organizations

Allow for new and innovative mechanisms of quality assurance to surface. Establish a mechanism, in statute, for the Department to consider non-accrediting agencies as potential guarantors of quality.

3.3 Establish less burdensome access to Title IV funding for high-quality, low-risk institutions.

Grant high-quality low-risk institutions access to Title IV funding with fewer burdens. Implement a risk-adjusted approach to accreditation and free up accrediting agencies and the Department to have more time and resources to focus on institutions that pose the greatest quality concerns.

[As background and commentary, a pilot might work like this: Only institutions which have completed one or more full accreditation cycles, have not had such accreditation denied, withdrawn, suspended, or terminated for cause, or been placed on probation for cause, and annually meet and abide by the Department's financial requirements are eligible to participate. These eligible institutions would register directly with the Department and annually file proof of (1) learning gains and/or professional certification and licensure exams, and (2) that they measure and accurately report price, financial aid, graduation, and student learning outcomes. Independent third-party audits of this information would need to be submitted. Upon registration, the Department would expeditiously certify institutions as recognized by the Secretary for purposes of receiving Title IV funding. This direct recognition would remain in force even if the institution decides after initial registration and recognition to cease being accredited by an accrediting agency. The Department could impose stiff sanctions for false reporting of self-certification data, which could include removal of Expedited Recognition. Finally, the Secretary may deny or remove Expedited Recognition of an institution if: the institution requests a full accreditation review; after determining there is cause after a challenge for cause by the State within which the institution is located or enrolls students or by an accrediting agency recognized by the Secretary; it ceases to abide by the Department's financial risk criteria; and, the fundamental structure or mission (or both) of the institution is changed (including a sharp drop in enrollment, financial difficulties, illegal behavior, and other such criteria that the Secretary prescribes by regulation).]

3.4 Before eligibility for Title IV, require institutions to provide self-certified data on key metrics of access, cost and student success.

The intent of this requirement is for the information to be independently audited to ensure accurate information; if the information is faulty, sanctions apply. The data would be information that schools are already largely providing, but now in way that is consistent and easy for families to access.

Suggestions for the self-certified data are:

- o Dropouts, extended time-to-degree, excess credit hours,*
- o Student loan burdens,*

- o Repayment rates on loans,*
- o Job placement rates for vocationally focused programs,*
- o pass rates on licensure examinations,*
- o Results of nationally-normed assessments of student learning gains,*
- o Financial disclosures related to institutional viability.*

3.5 Recommend that accreditation not be an all-or-nothing affair. Establish a range of accreditation statuses that provides differential access to Title IV funds.

Under this differential approach, new institutions could more quickly receive partial benefit from these funds, while still providing some protection for taxpayer investment in higher education. At the same time, this will free up accrediting agencies and the department to have more time and resources to focus on institutions that pose the greatest quality concerns while lessening the burden of complying with accreditation on high-quality, low financial risk institution.

TASK #4: NACIQI's Role and Function

Overview:

The recommendations here reflect an underlying concern that, in many ways, the NACIQI currently has relatively little authority to improve the process and quality of higher education. While the HEOA mandate suggests a central role, the NACIQI is captive to the current process that leaves all decisions to the Department. NACIQI's current role is ministerial, but not significant. The Department does not utilize the expertise of its NACIQI members nor entrust it to make decisions, and as a result, NACIQI's efforts and contributions are, at best, blunted.

It is necessary to clarify and better define the role and each step regarding the NACIQI's role going forward and to ask what assessment options best ensure that an adequate level of quality education is offered by the institutions accredited by a recognized accreditor.

Facilitating the communications process will require better-defined and clearer communication opportunities between the Department and NACIQI.

4.1 Reconstitute NACIQI as an operational committee with terminal decision-making authority and a staff. This will establish NACIQI as the final decision-making authority on accrediting agency recognition.

4.2 Alternatively, establish that the staff recommendation is provided to the NACIQI for its consideration and that the NACIQI recommendation will be the singular final recommendation to the Senior Department official.

4.3 Establish that in the event of an accrediting agency's appeal of the recommendation, NACIQI, sans Department staff, will respond to the accrediting agency's appeal submittal to the Department.

4.4 Establish that NACIQI and the Education Secretary and other Department officials meet periodically for mutual briefings and discussions, including policy issues such as "gainful employment," and resulting in policy recommendations.

4.5 Establish that NACIQI, itself, timely disseminates its reports to the Department and to the appropriate Congressional committees.