Statement of
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"Accreditation as Quality Assurance: Meeting the Needs of 21st Century Learning"

Good morning, Senator Harkin, Senator Alexander and members of the Committee. Thank you for this opportunity to address the issue of accreditation as a key quality assurance process for higher education in the United States, and its ability to meet the needs of 21st Century learning.

I have worked in higher education for over 40 years, and served as president of the Senior College and University Commission of WASC, the Western Association of Schools and Colleges, for 17 years. WASC is one of the six regional accrediting associations recognized by the US Department of Education and the Council of Higher Education Accreditation (CHEA). I stepped down as president August 30, 2013 and until December 31, serve as a Senior Advisor, and thereafter will be serving as an independent consultant on higher education and accreditation issues. Thus, I am addressing you as one with extensive experience in accreditation and higher education, but I do not serve any longer as an official representative of any accrediting agency. My comments are directed primarily to the regional accrediting system, which collectively accredits over 3000 institutions.

This hearing, and the discussions that will occur as part of renewal of the Higher Education Act, come at an incredibly dynamic period for higher education. At a time when higher education is seen as critical to the future of our country, there are significant criticisms of both higher education and accreditation as a system assuring the quality and effectiveness of these institutions. Some are beginning to question whether degrees will continue to be the most valuable credential or whether students need to acquire "stackable credentials" and badges that display more about what someone can do; simultaneously, we are seeing the deinstitutionalization of learning as more and more

students attend multiple institutions and bring with them courses and learning activities from a variety of sources outside traditional institutional settings, such as credit for prior learning, courses from MOOCs, iTunes U, TED.com and other providers. Increasingly, technology is being used to create adaptive learning systems that augment, and will possibly replace, some or all of the instructional functions performed by faculty. And new entities are being formed that are challenging traditional notions of delivery and costing structures. While many of these changes are emergent, (re)defining and assuring quality at traditional and innovative institutions alike is the challenge we all face for the future. It is likely that the pace of change will only increase with many approaches that we cannot foresee today, just as we did not foresee the advent and growth of MOOCs even three years ago.

I will state at the outset that I believe that accreditation can, and should, remain a vital part of the quality assurance system for the present and future, but it is clear that accreditation, and all other parts of the higher education system, are going to need to adapt to these changes. While president of WASC I tried, with considerable success, to reframe our agency as a vibrant voice for public accountability. I believe there are lessons to be learned from the work we have done, as well as important steps underway with other accreditors to respond to these changes. Accreditation is going to need to respond to the concerns that critics have asserted, rightly or wrongly, in a responsible way, while at the same time, respond to the many innovations occurring today and in the future. This will need to include support for experimental or pilot efforts for both traditional and new institutions and entities.

I. Background and description of accreditation

Accreditation is over 100 years old, established by schools, colleges and universities to create common standards and assure quality across institutions. It has adapted repeatedly to serve the diverse array of institutional missions within the American higher education system. In the past 50 years, and especially in the past 20, the number of specialized, online and for-profit institutions has increased significantly.

All accrediting agencies use a similar process – institutions undertake reflective self-studies framed by the accrediting agency's standards, with the goal of identifying areas of strength and needed improvement, followed by a review of the institutional report and a site visit by a team of specially trained peer reviewers, senior level experts who assess the accuracy of the institution's self-study and issue a report with commendations and recommendations. The professional judgment of these volunteer peer reviewers is the cornerstone of the accrediting process and these reviewers are matched to the type of institution being reviewed to ensure an in depth review. These peers undertake their reviews with keen awareness of their responsibilities to serve the public interest.

Site visits provide an opportunity to verify information submitted by the institution and interact with faculty, students and staff in ways that no purely documentary review ever could. Site visits also enable teams to understand each institution's context in greater depth so that findings and recommendations for improvement are more authentic and realistic. The institution's self-study and the team report are then reviewed by an accrediting commission of institutional and public members who make an accrediting decision.

The standards developed and applied by each agency are periodically reviewed and revised through surveys and consultations with a wide range of constituencies, including but not limited to the institutions themselves, as well as students, business groups and policy leaders so that they represent not only effective minimum standards of accountability but also lead institutions to greater quality and effectiveness. In the most recent WASC review of standards, a series of papers were commissioned to identify areas of needed reform along with extensive surveys and meetings, leading to calls to place students more in the center of the accrediting process through an emphasis on completion and demonstrated learning outcomes.

In addition to these regular cycles of comprehensive review that range from every six to ten years depending on the region, accrediting agencies undertake close monitoring of institutions through annual reports, required prior approval of new off-campus and distance education programs, mergers and other changes in between cycles.

Additionally, progress reports and special visits are often required when needed to assure institutional follow-up to key issues.

Accreditation typically means something different for institutions at different stages of maturity. For a new institution, accreditation is largely a gatekeeping function to ensure that the institution meets all standards at least at a minimum level of compliance. For well-established institutions, accreditation is more about identifying areas of needed improvement, and questions about how to avoid rote compliance for these institutions has led to different approaches by each of the regions to address this concern. Data collected by regional accrediting associations reflect that approximately 40% of institutions initially applying for accreditation do not achieve it, and well over 50% of institutions undergoing comprehensive review are required to have additional monitoring and follow up to ensure continued attention and progress in addressing areas of needed improvement.

As institutional accreditors, the standards adopted by regional agencies are necessarily comprehensive in nature. Federal law and regulations require that accreditors have standards that address ten specified areas. (Section 602.16) There are many elements to ensuring institutional and educational effectiveness and standards adopted by accrediting agencies reflect these multiple dimensions, going beyond the areas identified in law. The standards are intended to assure, individually as well as collectively, institutional integrity, sustainability and effectiveness. Standards address such areas as sufficiency of financial resources, the sufficiency and qualifications of faculty for the range and types of programs offered, technology resources and support; the currency and quality of educational programs; student support services; decision making processes; planning for the future; institutional data collection and analysis against key institutional metrics and more. Institutional integrity is also reviewed in depth through review of institutional promotional materials, recruitment and admissions practices, and financial statements. Regional accreditation is of the whole institution, and since each course and program cannot be reviewed individually in large comprehensive universities, focus is placed on quality assurance systems, and whether institutions themselves have clear goals, educational outcomes, and analyze data on their own effectiveness.

While review of institutional resources and processes are important for assuring institutional sustainability and the creation of conditions leading to quality, increasingly accreditors are calling for demonstrating institutional effectiveness in terms of demonstrated achievement of learning outcomes for each of the institution's educational programs. This is reflected as well in federal law in Section 601.16 as well and characterized as "success with respect to student achievement." Multiple studies have shown that accreditors are the primary driver of institutions identifying and assessing student learning outcomes beyond grades. This has led to a shift in focus from teaching to learning in the accrediting process, and institutions are undertaking multiple assessments of student learning through the use of rubrics, portfolios, local and nationally normed tests, and other measures.

Institutions across the country have engaged in serious efforts to identify and measure learning outcomes in general education and in each major, and have been supported by efforts of many groups, such as the American Association of Colleges and Universities (AAC&U) essential learning outcomes projects. At WASC we even created an Assessment Leadership Academy with a 9-month certificate program top prepare experts in assessment to work within their own institutions; the Higher Learning Commission runs its on assessment institute, and SACS offers a well-attended summer institute on assessment. Thus, accrediting agencies have been leading the higher education community in not only requiring assessment of student learning outcomes but also training faculty and staff toward learning centered institutions.

II. Responding to accountability concerns – accreditation and the public interest

Over the past several years, critics have charged that accreditation has not been a strong enough force for institutional accountability and that it has failed to protect the public interest. Accreditors, in turn, discuss institutions "turned around" as a result of accreditation actions and its ongoing monitoring, and of dramatic changes resulting from the peer review process. In my view, there is much to support both the concerns about accreditation and our defense – but the two sides are not effectively communicating and

addressing each other. Along with the increased importance of higher education, and its cost, greater attention has been placed in the policy world on what have become key markers of the higher education system's effectiveness – completion rates, learning results, and institutional truthfulness and integrity in recruitment practices and representation of future job prospects, licensure, etc. Because accreditation deals with each institution individually and in relation to its distinct mission, there is little system-wide reflection on how and to what extent the accrediting process addresses the overall effectiveness of higher education in each region, let alone nationally. As well, accreditation has historically seen itself as a member-driven organization needing the consent of its membership for the adoption of new standards and new processes.

The times have changed, and increasingly accrediting agencies have redefined their purpose to serving the public interest along with that of their membership. For example, both the Higher Learning Commission and WASC have standards calling for institutions to demonstrate that they serve the public interest. The significant investment of time devoted to the accrediting process by institutions, teams, and commission members serves the public interest, but as key indicators become more central to the policy debate, it will be important for accrediting agencies to more clearly define how they are responding to these issues or lose their relevance to these important policy debates.

It is possible for accreditation to continue to play a significant role in addressing policy concerns and still maintain its mission-centered approach to institutional evaluation – but only by becoming clear and direct in making these issues more visible and central to the accrediting process. Several such issues, and needed steps, follow:

Embracing a clear role for accreditation to serve as a voice for public accountability. While accreditation is a creation of the institutions themselves, and funded through dues and fees from those institutions, the accrediting community needs to publicly embrace and define more clearly its role in assuring the accountability of the institutions each agency accredits. As described below, I believe that greater transparency is central to this charge. But equally important is for each agency to define how it is

responding, through its standards, processes and actions, to the call for greater accountability of higher education in such key areas as retention/graduation, learning results, supporting student needs and responsiveness to the changing environment in higher education. The following chart reflects that this is a new role for accreditation and one that can and should be articulated by each agency. In other words, while retaining their comprehensive approach to institutional quality and integrity, accrediting agencies can, and should, articulate and demonstrate publicly how they are addressing key issues of accountability in the accrediting review process.

ROLES OF ACCREDITATION			
Core Functions of Accreditation	**Compliance Centered**	**Improvement Centered**	**Accountability/Quality Assurance Centered**
Focus of Review	All standards applied to assure compliance	Key areas selected and approved by accreditor for improvement	Specific areas identified as part of all reviews to address common policy issues—e.g., retention/graduation rates, student learning outcomes
Demonstration of Effectiveness	Must demonstrate standards are met at least at minimum level	Simplified compliance review and primary emphasis on recommended improvements	Standards of performance set by institutions, and, where appropriate, comparative indicators used
Public Reporting and Transparency	Public announcement of grant of accreditation	Reports internally circulated for improvement; accrediting action publicly reported	Meaningful and clear public information about institutional performance and commission actions reported

Increasing Transparency. Federal regulations require that accreditors provide basic information about an institution's status with the agency, the date of its next visit, when first accredited and that a statement of reasons be issued when an institution is placed on a sanction. For accreditation to assure confidence in its actions, there needs to be far greater transparency. There are concerns that candor would be lost, but as part of the public accountability role accreditation needs to play, more information needs to be readily available to policy makers and the public on what accreditation teams do and the actions accrediting commissions take. Nearly all public institutions already are required

to make their accrediting reports publicly available. The WASC Senior College Commission took the step in June 2012 to require that all team reports and Commission decision letters be made public on our website. This was done after consultation and support from the institutions in the region, and has been accomplished with few problems. Institutions can choose whether to make their self-studies public but it is important for the public to see not only the final decision, but also the basis for actions that accreditors take. The Higher Learning Commission of North Central is moving in this direction as well and the Middle States Association has been providing more information about its actions. If accrediting teams are not focused on the right issues, or not doing an effective job, then the work products of the process should be available for review, comment and research. Confidence in accreditation is best established when all can see what we do.

Establishing benchmarks for learning results. For the past 20 years tremendous emphasis has been placed in the accrediting process on specifying and assessing learning outcomes. Studies have been conducted, however, that challenge the effectiveness of college and the learning gains of students. Employer surveys also question the preparedness of many of today's graduates for the workplace. One of the greatest values of accreditation is that is evaluates institutions in the context of each institution's mission and student body characteristics. Cal Tech and Pomona College, for example, have different missions, and student bodies, than California State University, San Bernardino or Laney Community College. A single measure of learning would not be useful or appropriate for all institutions, yet we cannot escape the question whether the learning of graduates in key areas meet appropriate standards or benchmarks. Accreditors, working with institutions, must be able to demonstrate that graduates are proficient in key areas that are foundational for their future. Assessment needs to move beyond process to an evaluation of results. This too needs to be part of a new public accountability agenda that accreditors are moving toward and need to embrace. Is the level of learning of the institution's graduates "good enough"? In the most recent revisions to the WASC (Senior) accrediting standards, we required each institution to demonstrate that core competencies in five key areas be established for all graduates -- in written and oral

communication, critical thinking, quantitative reasoning and information literacy, as well as in other areas defined by the institution as important to their mission, as well as in the discipline in which the degree is awarded. Such a requirement was contested and deeply debated throughout the region, and finally adopted by the WASC Commission with the understanding that each institution needed to define, and establish evidence for its proficiency standards for graduates, and that there could be variation within the institution as well depending on the student's major field of study. Already, institutions are hard at work defining and developing tools for assessing performance beyond the assessment efforts already underway. It will be important to recognize that no single test or instrument can fully measure the complexity of learning, and the application of skills needed for 21st Century learning. Multiple indicators are needed. Teams will also need to be trained how to determine and evaluate what are appropriate levels of learning for institutions, and with reports now being made public, these efforts will be transparent.

In addition, several accrediting agencies have piloted the application of the Degree Qualifications Profile, developed by a team supported by the Lumina Foundation, as an optional framework for evaluating degree requirements and the outcomes of learning. SACS, for example, has used the DQP for a project with HBCU's; WASC (Senior) piloted it with 28 institutions, several of which used the framework to revise their degree program.

It is understood that the visibility and impact of these efforts need to be better communicated – both by institutions displaying learning results with appropriate context, and accrediting agencies as central elements in the accrediting process, with the agency's evaluation of learning results made public, to address growing concerns about quality across the higher education system.

Addressing completion responsibly. One of the thorniest issues is the role of accreditation in improving retention and graduation responsibly given the diversity of institutions, differing student characteristics, and difficulty of getting complete and accurate data on the mobility of students. Institutions need to take greater responsibility for collecting and analyzing retention and graduation data, disaggregated by different

characteristics, and establish meaningful benchmarks for defining an effective level of completion. As part of the public accountability agenda for regional accreditation, more needs to be done to make an evaluation of retention and graduation data central to the accrediting process. This issue was a key element in the redesign of WASC (Senior) accreditation, and a review of disaggregated institutional data has become a major focus of the accrediting review process. The Higher Learning Commission, the Middle States Association and the New England Association have also made such reviews more central to their processes. The challenge is in the evaluation of the data – what is an appropriate completion rate for this particular institution? How can the institution increase completion while also improving learning results? No single number or metric works for each and every institution, yet there are clearly institutions with rates of completion that are comparatively low and those with significant completion rates, especially for underrepresented groups. Accreditation is beginning to call this out and monitor efforts to address and improve retention. Such efforts will take time and commitment on the part of institutions and accreditors as well as sensitivity to the fact that improving retention is not always easily addressed, and it takes time to determine if such efforts are successful.

As the administration develops its new rating systems, accreditors will need to consider the data elements reflected in this new system and determine how to incorporate the data into their processes. Of course, the accuracy of data will be critical, and it will be important as well to probe in depth the data in relation to each institution's mission and context.

Improving retention must be coupled with efforts to monitor and improve learning so that the two efforts are intertwined. Completion without effective learning creates a hollow statistic, while efforts to improve learning standards must take into account the impact on student retention.

Assuring the quality and integrity of highly entrepreneurial institutions (and programs). This committee has raised serious questions about the effectiveness of accreditors in reviewing the practices of publicly traded for profit institutions. While not all publicly traded institutions were found to engage in questionable practices, the

hearings clearly revealed that more needed to be done by both accreditors and the Department of Education to discover and address such practices. Since these hearings, considerable effort has been undertaken to tighten reviews of entrepreneurial institutions, for profit and nonprofit alike, through more detailed reviews and additional monitoring activities. Efforts to acquire accreditation through the acquisition of struggling institutions has become more closely monitored and infrequent, and efforts to incubate innovative new programs or institutions through affiliation agreements with accredited institutions creates a Catch-22: the new program or institution seeking to develop into an independent and separately accredited entity runs afoul of the accreditation requirement that the accredited institution must take full responsibility for all academic components offered in its name. Ironically, heightened oversight to assure quality and integrity of these arrangements is now associated with being a barrier to innovation. A middle ground must be found and some suggestions are below.

Rightsizing the cost and expectations of the accrediting process. Engaging in self-study and institutional review takes on different characteristics for a new institution seeking initial accreditation than a well-established institution that has been reviewed multiple times with no major issues or problems. If one were to view the accrediting process as a periodic academic and institutional audit comparable to (but even more comprehensive) than a financial audit, the costs of accreditation would seem quite reasonable. Furthermore, to the extent that institutions are able to use the self-study and team review process to make needed changes, as all accreditors encourage, the costs of the process are typically of internal value as well. Nonetheless, a number of institutions have called into question whether the accrediting process needs to be the same, and as labor intensive, for all institutions, especially those which have always had highly successful or positive reviews. Each regional accreditor has attempted ways to make the process relevant to the institution being reviewed, and the New Pathways process of the Higher Learning Commission is one approach. Both SACS and WASC (Senior) use a combination of offsite and onsite reviews to do as much as possible offsite through review of documents and institutional data, and to focus the onsite review to institutional improvement.

One of the barriers to radical change comes from interpretations by the Department of Education staff that all institutions must undertake a comprehensive self-study against every accreditation standard, and all evaluation teams must evaluate each institution against every one of these standards. While technology permits electronic transmissions of material, radical changes to the process needs to be explored, including reviews of publicly available information and waivers of certain standards to allow for more limited and focused self studies (or redefining these reports altogether) and using new approaches to institutional evaluation. Such efforts would need to be through collaborative efforts of accreditors, institutions and the Department of Education and should be undertaken so that the process can be more effectively tailored to each institution's history and context.

IV. Responding to innovation and the changing landscape of higher education

Over the past decade concerns over accountability took primacy when addressing the role of accreditation. In the past two years, however, the dramatic innovations in higher education have led to questioning whether accreditation can adapt quickly enough to these changes or has become a barrier to change. We are seeing hundreds of MOOC courses offered for free by Coursera, Udacity and edX, significantly lower cost courses offered with and without faculty support by Straighterline, free universities such as University of the People, lower cost programs being piloted without financial aid by Patten University/UNow, competency-based programs that do not rely directly on credit hour designations such as those developed by Southern New Hampshire University and University of Wisconsin (and others), adaptive learning software tied to courses such as those developed by the Online Learning Initiative (OLI), badges developed by the Mozilla Foundation and being used by Purdue and UC, Davis, innovative programs such as that developed by Minerva and more. More and more attention is being placed on employer needs, identifiable ways for employers to know what today's graduates know and can do, developing a wider range of certificates to acknowledge completion of competencies, packetization of learning material such as that developed by Salman Khan, creation of "stackable" credentials, and on and on. Even more change is likely to come, at

an ever increasing pace, in the future. As well, as more and more digital natives enter college, many will be bringing with them new digital skills and expectations, as well as a set of learning activities for which they will seek recognition in the form of credit and advanced placement.

What is clear is that tremendous change is occurring, and whether or not every innovation will succeed is less significant than how to determine which innovations are of sufficient quality to deserve recognition in the form of credit award or financial aid. Here is where accreditation may be able to play a role but structural issues may be a limiting factor for some innovations. Currently, all regional accrediting agencies accredit only institutions that award degrees. Thus, institutions offering courses and subdegree programs are ineligible for regional accreditation.

Regional accreditation has been far more open to innovation than its critics give it credit for. For example, online universities have been accredited for some time; so too have many institutions with highly distinctive missions or delivery processes. In response to the development of competency-based programs moving off the credit hour system, New England, Southern, the Higher Learning Commission and WASC have all developed criteria for the review of such programs and approved. These review processes are designed to protect students and assure quality.

Some critics have expressed concerns that the accrediting process takes too long for startup institutions, and the lack of accreditation, or access to financial aid, stymies their development and recognition of their activities. It is true that for new totally new institutions, the process typically takes a minimum of four to six years to move through the multiple stages to initial accreditation. Partly that is due to federal regulations that require at least one class to have graduated before institutions can be accredited. But the time to become accredited is an insurance policy that the institution has the stability and quality to sustain its operations and warrants recognition by peer institutions as well as the public.

The Department of Education has recently put forth a proposal to develop the experimental site concept to promote innovation. There may be value in considering whether to develop an experimental accrediting process for innovative programs and activities that are currently ineligible for regional accreditation, as a complement to the regional system. Rather than accrediting individual courses, such a process could carry over the principle of institutional accreditation for all courses or programs offered by the entity, based on quality principles newly developed for such activities, emphasizing outcomes and results, and using a "design-build" model of approval and ongoing monitoring.

What is clear is that trying to develop more regulations to encompass current and yet-to-be developed innovations will only stymie new creative ideas and projects. I serve on a quality assurance board assessing educational institutions operating in the free zones of Dubai, where a review system is in place as an alternative to the national system of accreditation. Here in the United States, we may want to experiment with "innovation zones" in which new models and approaches could be piloted and reviewed by a newly developed process designed through collaboration between the Department, institutions, employers, students, and accreditors.

V. Evaluating alternatives to accreditation

There are those who suggest that accreditation has outlived its usefulness and should be replaced by other systems of quality assurance. I am not convinced that alternatives that have been proposed would be more effective; in fact, I see the alternatives that have been suggested as far weaker than the current system in protecting students and the public, and assuring institutional quality and integrity. Alternatives that have been proposed include:

A public disclosure approach. There are those who suggest that disclosure of key institutional characteristics would provide sufficient information for consumer choice regarding quality and integrity. For some, this would have the federal government going beyond its current threshold reviews of institutional finances and defining indicators of

minimum performance in other areas. It is not clear from such proposals who would assure the accuracy and truthfulness of institutional statements. A free market approach would create even greater opportunity for mischief and misstatements. As mentioned above, the new administration ratings system will provide disclosure of information in relation to several key areas, but not reflect the comprehensive dimensions that accreditors review at each institution.

Greater assertion of federal oversight. Others have suggested that greater federal intervention should be exercised in place of accreditation or assuming some of the threshold compliance role of accreditation. Already, there are more than 100 regulations in place for the recognition of accrediting agencies, and many additional sub-regulatory interpretations going beyond this regulatory language. Ore regulations do not necessarily lead to greater quality or productivity, but often increase the administrative burden of the accrediting process. Given the inability of regulations to be applied contextually or adaptively, this approach would undoubtedly limit institutional reviews to minimum compliance with Departmentally defined metrics, but there would be no impetus for promoting institutional excellence or improvement, or innovation.

Creating separate processes or accrediting agencies for different categories of institutions. There are those who suggest that accreditation should be segmented by institutional type. Apart from the problem of defining what would be the types or categories of institutions that would qualify for segmental accreditation, this approach would need to define differential standards for each category. Such an approach could well create a de facto ranking system for higher education, causing those institutions that serve underrepresented populations to be seen as "lesser than" elite institutions. Today's graduates need to be able to compete an open marketplace and one of the greatest virtues of regional accreditation is that it puts all different types of institutions under a common review process.

VI. Recommendations and conclusion

I have presented a number of recommendations throughout this testimony. There is still a significant role for accreditation to play in the quality assurance system for American higher education. As much as accreditation has withstood the test of time, changes are being made to standards and processes to respond to the changing character of traditional and nontraditional institutions alike. But, as I have stated earlier, more needs to be done to position accreditation to become a more robust and visible voice for public accountability in key areas, and to assure that it is responsibly and expeditiously addressing educational innovation.

As we move into a future where change will even be more rapid and dynamic, experimentation and new approaches should be developed as complementary to existing accreditation processes. If successful, these experimental approaches thereafter could be integrated into existing accreditation structures or developed into sustainable enterprises in their own right. To do so, however, there will be need for the recognition process of the Department of Education to become more open and flexible to allow for new and more adaptive evaluation approaches that could be implemented by crediting agencies for traditional and new institutions alike.

With the dialogue continuing over the coming months as to how best to respond to the many changes and issues affecting higher education, we all need to remain open to new ideas and approaches, and be willing to collaborate for a better future for today's and tomorrow's students.