

Higher Education Accreditation: How Can The System Better Ensure Quality and Accountability?

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Testimony

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Steven D. Crow is the Executive Director of the Commission on Higher Learning of the North Central Association of Colleges and Schools. He provides leadership to the Commission and its 990 member institutions to assure the effectiveness of regional institutional accreditation and to represent the Commission nationally and internationally.

Crow earned his bachelor's degree in history from Lewis and Clark College and his Master's and Ph.D. degrees in U.S. History from the University of Wisconsin-Madison. Before joining the Commission staff in 1982, he served as an administrator and taught at Bowdoin College, Vanderbilt University, Bates College, and Kalamazoo College.

Crow has been instrumental in making regional institutional accreditation responsive to eLearning, U.S. education delivered internationally, and new collaborative and consortial arrangements created in several states. Most recently his Commission has gained significant attention through its creation of an alternative accreditation process based on quality improvement principles and practices; its adoption of new accrediting standards that focus on learning, service, and preparation for the future. Crow has spearheaded collaborative efforts with other agencies and associations to address distance education, assessment of student learning, and provision of quality assurance to trans-regional organizations.

Statement of Steven D. Crow

Executive Director

The Higher Learning Commission

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Before the
Committee on Health, Education,
Labor, and Pensions
United States Senate

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Mr. Chairman and Members of the Committee, I appreciate the opportunity to be here today to discuss Higher Education Accreditation. I head The Higher Learning Commission of the North Central Association of Colleges and Schools. Recognized by both the United States Department of Education and the Council on Higher Education Accreditation, the Commission has a membership of 985 colleges and universities located in the 19 states of the north central region. We also are proud to count in that membership 17 tribal colleges whose authority comes from sovereign nations located within those states. My Commission has accredited colleges and universities since 1913. I also serve as the co-chair of the Council of Regional Accrediting Commissions (C-RAC). The seven regional accrediting associations accredit 3,022 institutions enrolling approximately 16,619,890 students.

Each regional institutional accreditation agency was created by the colleges and universities it accredits. For the past 50 years these agencies, originally established to provide self-regulation and shared assistance in stimulating institutional and education improvement, have served a unique quasi-public role in that their accreditation decisions on institutions have been accepted by the federal government as sufficient evidence of educational quality to warrant disbursement of federal student financial aid and other federal grants to those institutions. For the past 15 years in particular, we have all been engaged in the very unique and very American effort to create an effective and trustworthy partnership through which privately held, voluntary self-regulation supports the broad public policy agenda for higher education as defined by the federal government.

As we have every five years since the passage of the first Higher Education Act, we are engaged again in very basic discussions about how accreditation generally, but regional institutional accreditation in particular, effectively serves the public interest through its gatekeeping role for federal funds. A little over a decade ago, the concern was whether accreditation could be an effective shield against fraud and abuse. The last decade, I believe, has shown that it can be. It is fair to say that most of us, although deeply concerned by the new levels of federal oversight established in 1992, have come to understand, appreciate, and support the relationship we now have with the Department of Education.

But we understand that new concerns mark this reauthorization. We welcome the indications we have received that the link between regional accreditation and Title IV

gatekeeping will be retained and strengthened. This is wise policy because:

- Accreditation has proven to be an effective partner with the federal government over the decades, responding effectively to new federal requirements adopted in 1992 and continued in 1998.
- Accreditation has proven to be responsive to changing public policies for higher education through standards that emphasize access and equity and, most recently, assessment of student learning.
- Accreditation honors and supports the multiple missions of U.S. institutions of higher education so essential to the success of higher education and to increased access for students.
- Accreditation through private, non-profit agencies provides exceptional service at no direct cost to taxpayers.
- Most institutions support the claim that accreditation contributes value to their operations and supports them as they strive to improve the quality of education they provide.
- Self-regulation of the quality of higher education through recognized accrediting agencies is an effective tool to inform the marketplace because it relies on expert judgments of higher education professionals; moreover, because of that expert judgment it carries significant credibility with the institutions under review.

Without assuming to understand all of the other significant issues that each member of this Committee might want to discuss, I will address the primary issues that my regional colleagues and I understand to figure most prominently in this reauthorization. I will list the matters and provide a brief summary of how most of us in regional accreditation understand each issue and how we would like to shape our relationship with the Department to address it. Several regional associations part of C-RAC have put forward to members of the House and Senate specific legislative proposals. The following comments summarize much of the contents of those proposals.

INSTITUTIONAL AND AGENCY ACCOUNTABILITY FOR STUDENT LEARNING

Starting with the 1988 reauthorization that explicitly mentioned the expectation that a Department-recognized accrediting agency include within its standards measures of student learning, the federal call for increased accountability for educational performance has been heard. In fact, my Commission initiated its student academic achievement initiative that year, and we have been energetically pushing our institutions to conceptualize and implement assessment programs ever since. Each of the other regional associations, as well as our national counterparts, has made evaluation of student learning a central focal point of our work. Each of the five regional associations that rewrote their standards in the past four years placed achieved student learning at the center of those new standards.

But measuring student learning for the goal of educational improvement, no matter how well it is done, does not automatically meet the current expectation that the findings of those measurements be shared with current and prospective students and the public at

large. The fact is that a surprisingly large number of our colleges and universities have lots of outcome data that they use to evaluate their own educational effectiveness. For some types of institutions the data are fairly standard and provide grounds for comparison: graduation rates, job placement rates, licensing rates, and so forth. Each institution has data that are institutionally specific, testifying to an educational mission achieved but not allowing for easy benchmarking with other colleges and universities. While concerned about any law that would summarize educational performance in a few standardized measures applied to all types of colleges and universities, we would support legislation that:

- Continues the expectation that a federally recognized accrediting agency has standards related to successful student learning. We encourage legislative interpretation of this requirement that gives discretion to the Department to interpret the law to allow for qualitative standards instead of the bright-line performance standards being called for by the recent Office of the Inspector General report (ED-OIG/A09-C0014, July 2003).
- Requires institutions receiving Title IV monies to provide public information about educational performance easily understood by prospective and current students. However, we would allow each institution to create its own report fitted to its educational objectives and drawing, as appropriate, on the variety of data it uses in determining its own effectiveness.
- Establishes for Department-recognized accrediting agencies (1) the responsibility to vouch for the effective distribution of this public information and (2) the expectation that within an accreditation visit the agency will consider the publicly-disclosed student learning data as part of the review. We highly recommend that this be stated as an expectation for agency practice, not as a requirement for specific learning outcomes standards that a recognized agency must adopt and apply.
- Establishes for Department recognition the creation and implementation by an accrediting agency of a stronger program of disclosure about accreditation processes, accreditation actions, and the finding related to those actions. At this point, the regional commissions have not agreed on a common template that we all might use, but it is one of our highest priorities. We strongly urge that the template for public disclosure not be defined in law, allowing important conversations within the accrediting community to create effective and appropriate models.

STUDENT MOBILITY AND TRANSFER OF CREDIT

Accrediting standards hold that the institution granting a degree must be accountable for the integrity of that degree. Yet we appreciate the fact that transfer of credit is a matter of public concern. Although none of the regional accrediting associations have policies that limit the variables an institution should consider in determining transfer, we have come to learn that many of our members act as though we expect them to limit transfer to credits coming from other regionally accredited institutions. In recent years we have all adopted the CHEA principles on transfer (November 2000), which mark a new consensus on good practices in transfer, and we have forwarded them to our institutions for study and implementation.

My colleagues and I caution against any wording in this reauthorization that could be interpreted as federal regulation of this key component of institutional academic integrity. Yet we would support legislation that addresses transfer of credit by:

- Requiring institutions receiving Title IV to evaluate more than the accredited status of an institution in determining transferability of credits awarded by it.
- Requiring that an institution's transfer policies and procedures state unambiguously the criteria that will be weighed in determining transfer of credit.
- Stating that a Department-recognized accrediting agency will have procedures through which it reviews transfer policies during each accreditation review to ensure that they meet federal and agency expectations. While we also caution against adding significant new record-keeping and reporting requirements on transfer, we are willing to be expected to include in our accreditation reviews any public reports on transfer that might be required by state or federal agencies.

DISTANCE EDUCATION AND ELEARNING

Each regional Commission believes that it has been doing a sound job of evaluating distance education generally and eLearning specifically. We joined together just a few years ago to adopt a set of best practices that inform our institutions as they implement eLearning and our teams as they evaluate it. While we appreciate the concerns that many legislators have about this particular modality of providing education, we draw attention to the fact that on-line courses serve large numbers of campus-based students as well as students studying at a distance. In short, legislation that classifies all eLearning as distance education and then calls for different regulation of it will inadvertently set expectations for what some institutions and their campus-based students now treat as a "scheduling option."

The concern about eLearning appears to be directly related to the call to end the 50/50 rule that now disqualifies from eligibility for student financial aid certain types of institutions heavily involved in eLearning. Very few institutions accredited by regional agencies are disqualified by the 50/50 rule, and almost all of those that are have been participating in the Department of Education's Distance Demonstration Project. We take no stand on the 50/50 rule, but we do not believe that the price for its abolition should be enhanced scrutiny of distance education (eLearning) currently provided by our member institutions. Therefore, we would recommend that this reauthorization:

- Require Department-recognized accrediting agencies to document that their existing standards provide for effective evaluation of the quality of distance education. We propose that in lieu of defining special standards for eLearning, the bill rely on the standard of comparability: namely, that student learning in eLearning programs be comparable to that in campus-based programs. All regional associations have already been recognized by the Department as providing effective quality assurance for distance education. We would propose that such recognition be honored and, therefore, that we not be asked to review again all of the distance education and eLearning to which we have already extended accreditation.

- Recognize our offer to create and implement processes that allow us to monitor when appropriate those institutions with dramatically increasing student enrollments in their eLearning programs.
- Include, if found appropriate, our offer to document that our peer reviewers are selected and/or trained to ensure their capacity to evaluate eLearning.
- Include, if found appropriate, our offer to include within our reviews of eLearning an evaluation of how the institution documents the integrity of the student in eLearning courses and programs.

Mr. Chairman, thank you very much for the opportunity to testify today. I look forward to learning from my fellow panelists and answering any questions that you and the other members of this Committee may have.