

Testimony of

Barbara Brittingham

President, Commission on Institutions of Higher Education
New England Association of Schools and Colleges

before the

Senate Committee on Health, Education, Labor and Pensions (HELP)
United States Senate

Reauthorizing the Higher Education Act:

Access and Innovation

January 25, 2018

BIOGRAPHY

Barbara Brittingham is President of the Commission on Institutions of Higher Education (CIHE), New England Association of Schools and Colleges (NEASC) where she has worked since 2000. CIHE accredits 225 colleges and universities in the six New England States and 11 institutions in six other countries. Previously she served as a member and chair of the Commission.

She was Dean of the College of Human Science and Services at the University of Rhode Island where she also served as Interim Dean of University Libraries, Director of the Curriculum Research and Development Center, and Professor of Education. She was founding dean of the College of Education at Zayed University in the United Arab Emirates and worked in Ankara, Turkey, while on a World Bank project. Currently she serves on the board of Quality and Qualifications Ireland; on the Quality Council in Iceland; and on the Committee on Recognition of the Council for Higher Education Accreditation. She served on the American Council on Education National Task Force on Institutional Accreditation. From 2014-2017 she chaired the Council of Regional Accrediting Commissions.

She has served on the boards of six national accreditation organizations and has worked with ministries and universities in over twenty-five countries, sponsored by the Fulbright Commission, the U.S. State Department, the World Bank, and local governments and universities.

Summary of Testimony to the HELP Committee: January 25, 2018

Pertinent to this hearing, regional accreditors deal with four matters related to access and innovation.

First, quality in distance education. Our Commission has found that in evaluating the quality of distance education, institutional capacity is important; institutional control over academics, admission, and support services is key; faculty preparation and professional development are key; and monitoring student progression is essential. Distance education is no longer new. It is time to give accreditors more flexibility in how distance education is evaluated, specifically by allowing accreditors to determine whether the addition of distance education should be subject to the substantive change review. My full testimony includes an example.

Second, quality in competency-based education or CBE. In 2015, regional accreditors issued a statement on Competency-Based Education; the full statement can be found at c-rac.org. Based on our Commission's experience with CBE programs, the following are key quality considerations for CBE: 1) "*Competency*" means "*competent.*" *Students should be required to reach a level of achievement that is excellent or near excellent.* CBE is a higher promise of achievement – especially as relevant to employers – than is traditional higher education. 2) *Competencies must have currency through credit-hour equivalencies.* Students need credit hours on their transcripts so they can transfer to another institution or seek a higher degree.

Third, disaggregation of the faculty roles. Recently, some CBE programs have significantly "disaggregated" the faculty role to employ, e.g., subject matter experts, coaches, assessors. The question for quality assurance is: Do the roles add up? 1) Is course content based on appropriate expertise; 2) Is course design appropriate to the learning goals, the student body, and the modality of instruction; 3) Are assessments reliable and valid; 4) Do students get appropriate help when they need it; 5) Is the academic program coherent and periodically reviewed. For Congress, this likely means clarifying in statutory language that "regular and substantive interaction" focuses on the above five functions that faculty traditionally provide.

Fourth, experiments for accreditors. The re-authorized Higher Education Act should provide a way that accreditors can experiment with assuring educational quality. The House bill does this.

One way is differentiated accreditation. Accreditors have multiple ways to follow up on institutions at risk. At issue is how accreditors can ensure that stable, successful institutions have an accreditation process where their investment is commensurate with the outcome.

Another possible experiment is to consider the accreditation of systems of public institutions. At least in New England, where states are small, it might make sense to experiment with accrediting a system that makes its case about how it meets the accreditation standards. The opportunity for trusted accreditors to experiment can promote our common goals of access, innovation, and quality higher education.

More generally, the innovations that accreditors face today were not anticipated when the Higher Education Act was last authorized in 2008. And who can reliably predict the innovations in higher education that accreditors will face over the next five to ten years? For quality assurance to be robust and relevant, accreditors must be able to innovate in ways that are flexible and robust.

Testimony to HELP Committee

January 25, 2018

Chairman Alexander, Ranking Member Senator Murray, and members of the Committee. Thank you for the opportunity to testify today. My name is Barbara Brittingham, and I am President of the Commission on Institutions of Higher Education of the New England Association of Schools and Colleges, NEASC. Our Commission accredits 225 colleges and universities in New England and eleven American-style institutions abroad. We are proud that the Senate's HELP Committee has a member from each of our six states, reflecting the historical and current commitment of our communities to high-quality higher education.

The history of American higher education is in many ways a history of innovation. Accreditation has supported these innovations and continues to do so. Earlier, accreditors embraced land-grant institutions and community colleges that broadened access and brought education closer to employment needs. Recently, accreditation has embraced distance education, competency-based education, and dual enrollment programs for high school students that further open higher education to new populations. Now, through EQUIP, accreditors are expanding to boot camps and a wider range of third-party providers.

Today I want to address four matters:

First, quality in distance education. Our Commission has found that in evaluating the quality of distance education, institutional capacity is important; institutional control over academics, admission, and support services is key; faculty preparation and professional development are key; and monitoring student progression is essential.

Distance education is no longer new. It is time to give accreditors more flexibility in how distance education is evaluated, specifically by allowing accreditors to determine whether the addition of distance education should be subject to the substantive change review. For example, by federal regulation, this past year our Commission was obliged to review a proposal from Yale University to offer its physician assistant program online, even though it had gone through the governance process at Yale and had been approved by the specialized accreditor. This, frankly, was a waste of Yale's time and of the time of our volunteers.

Second, quality in competency-based education or CBE. While CBE has been around for decades, there is greater interest today. And there is every reason to believe that for today's generation, lifelong learning will be necessary. Much of that additional learning will be focused around competencies relevant to work, often provided in short-term packages.

In 2015, the seven regional accreditors issued a statement on Competency-Based Education; the statement provides guidance on the evaluation of CBE. The full statement can be found here: https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/New_on_the_Website/C_RAC_Statement_on_CBE_June_2015.pdf

Based on our Commission's experience with CBE programs, the following are key considerations for Congress in ensuring quality competency-based programs:

1. *"Competency" means "competent." Students should be required to reach a level of achievement that is excellent or near excellent.* Think of nurses and airline pilots. CBE represents a higher level of promise from the college or university about the quality of its graduates. Employers must find the competencies and their assessment to be trustworthy. They must know what a graduate can reliably do.
2. *Competencies must have currency through credit-hour equivalencies.* Imperfect as it is, the credit hour is currently the only quantitative proxy for how much a student has learned. Six-credit courses represent more learning than do three-credit courses. Credit hours can ensure that a CBE bachelor's degree is the same "size" as a regular bachelor's degree. Further, students need credit hours on their transcripts so they can apply for a higher degree or transfer to another institution.

With growing interest in CBE, Congress could helpfully support a way for accreditors, institutions, and the Department of Education to explore together alternative measures of academic progress that are understandable to the public and can be used for Title IV disbursement purposes.

Third, disaggregation of the faculty roles. Recently, some CBE and direct assessment programs have significantly "disaggregated" the faculty role. They employ individuals in a range of distinct roles, e.g., subject matter expert, coach, assessor. This phenomenon is not entirely new. For decades, we've long had lab assistants, advisors, tutors, graders, and clinical faculty.

In 2016, our Commission completed its recent standards revision. What was our Standard on *Faculty* is now *Teaching, Learning, and Scholarship*. And the standard was re-written to recognize the importance in many settings of professionals who engage in these "disaggregated" responsibilities.

The question for quality assurance with disaggregated faculty roles is: Do the roles add up?

- 1) Is course content based on appropriate expertise;
- 2) Is course design appropriate to the learning goals, the student body, and the modality of instruction;
- 3) Are assessments reliable and valid;
- 4) Do students get appropriate help when they need it;
- 5) Is the academic program coherent and is it periodically reviewed.

For Congress, this likely means clarifying in statutory language that "regular and substantive interaction" focuses on the above five functions that faculty provide. The "regular and substantive interaction" requirement was added by Congress to prevent waste, fraud, and abuse in distance education. The premise is a sound one, but it is time for Congress to modernize it, recognizing the changing roles of faculty in some programs. Accreditors, through the peer review process, are best suited to ensure compliance.

Fourth, experiments for accreditors. Through provisions in the current Higher Education Act, the Department of Education runs “experiments” in the disbursement of federal financial aid. Accreditors welcome these experiments and we learn from them.

The re-authorized higher education act should provide a way that accreditors can experiment with assuring educational quality. The House bill does this.

One way is differentiated accreditation. Regional accreditors have a good track record of paying extra attention to institutions that cause concern, whether that be in graduation rates, loan default rates, financial stability, or more qualitative matters. At issue is how accreditors can ensure that stable, successful institutions have an accreditation process where their investment is commensurate with the outcome. Our Commission wants to make sure that no institution has a “free pass,” but we would like more flexibility to tailor the comprehensive evaluation for institutions that do not hit triggers related to financial stability, state or federal investigations, graduation rates, and/or loan repayment rates.

Another possible experiment is to consider the accreditation of systems of public institutions. At least in New England, where states are small, it might make sense to experiment with accrediting a system that makes its case about how it meets the accreditation standards.

More generally, the innovations that accreditors face today were not anticipated when the Higher Education Act was last authorized in 2008. And who can reliably predict the innovations in higher education that accreditors will face over the next five to ten years? For quality assurance to be robust and relevant, accreditors must be able to innovate in ways that are flexible and robust.

Provision in the Higher Education Act for trusted accreditors to experiment can promote our common goals of access, innovation, and quality higher education.

Thank you for this opportunity. I look forward to your questions.