

STATEMENT OF
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BEFORE THE COMMITTEE ON HEALTH, EDUCATION, LABOR & PENSIONS
U.S. SENATE

Reauthorizing the Higher Education Act:
Evaluating Accreditation's role in Ensuring Quality

June 17, 2015

Mr. Chairman, Members of the Committee, my name is George Pruitt and I serve as president of Thomas Edison State College in New Jersey, chair of the Middle States Commission on Higher Education (MSCHE) and member of the board of the Council for Higher Education Accreditation or CHEA. I also served for 19 years as a member of the National Advisory Commission on Institutional Quality and Integrity, otherwise known as NACIQI. I served in that capacity under five secretaries of education, under three presidents of both parties. I share this with you because I bring to my testimony the perspective of someone who, as a college president, is subjected to accreditation, as an accreditor, someone who does accreditation, and as the longest serving member of NACIQI, someone who has been deeply embedded in the federal oversight and regulation of accreditation.

This written testimony will focus on the role of accreditation in ensuring quality in higher education with emphasis on what's working well. My remarks will also focus on some suggestions concerning improvements that could enhance accreditation, making it more valuable to students, the public and policy makers.

What's Working in Accreditation:

As noted above, I have a relatively long history of working on accreditation for my institution and in both regional and national organizations. I believe in it and I believe that individual

institutions and American higher education benefit from the self-study, peer review and related processes. Further, I believe that accreditation is a fundamentally sound system and will offer some observations supporting this conclusion.

- As Senators, the likelihood is that you most frequently hear about accreditation from institutions that are unhappy about some aspect of recent interactions. That is only one side of the story. The common criticism of accreditation is that it takes too long, costs too much, and doesn't have enough value. However, evidence from MSCHE's accredited institutions suggests different conclusions. Unsolicited comment from MSCHE institutions engaged in the accreditation process continues to emphasize that accreditation is beneficial and valuable. In the current round of reviews, one institution wrote in its response to the evaluation team report that: "At a time when peer accreditation is the object of intense government skepticism and increased public scrutiny, our experience would argue that this process can, in fact, work effectively to hold institutions accountable for continuous improvement in serving our students, other relevant constituencies, and the larger society." Many institutions have echoed these sentiments.
- All of the regional accrediting agencies, including Middle States, continue to develop and improve accreditation. Many of the agencies have recently been engaged in revising accreditation expectations and standards. Middle States has just completed a thorough reconceptualization of its standards for accreditation to focus on the quality of the student learning experience and educational outcomes. In the process, we have reduced the number of accreditation standards from 14 to 7. Agencies are also reviewing accreditation processes to make them more streamlined and to emphasize analytical, evidence-based approaches that are driven by an institution's own stated mission.
- Peer review, a focus on institutional improvement, and attention to institutional mission are signature elements of the U.S. accreditation system that should be maintained and that promote the diversity found in American higher education.
- Peer review works. Our corps of peer evaluators and team chairs take their work very seriously, producing thoughtful insight on what works and what could be improved to foster quality in our member institutions. If ever there was a "kinder-gentler" time when institutions were simply given a pass by colleague-evaluators this is not the case now.
- Accreditation is not a "once and done" activity. MSCHE maintains continuing contact with member institutions not only through decennial self-study and peer evaluation, but through follow-up activities as may be warranted, annual reporting, requests for information, and through institutional submission of applications to have substantive changes included in the scope of the institution's accreditation. The agency comes to know its constituency well in the course of these contacts.
- Accreditors are focused on student learning, achievement, and assessment. NILOA (the National Institute for Learning Outcomes Assessment) has found that accreditors are the primary driver of assessment work.

- The Senate Committee’s white paper on *Higher Education Accreditation Concepts and Proposals* addressed the usefulness of “risk-adjusted” or differentiated reviews. MSCHE and other regional accreditors already recognize the usefulness of this approach in the way that it monitors institutions. Some institutions require special monitoring and follow-up, while others do not.
- Accreditation reviews and actions are arrayed along a continuum. We can have great colleges and universities that may not be appropriately attending to some aspects of compliance with standards and expectations, and accrediting agencies ask for follow-up and improvements in these cases. We can also have smaller, special purpose or non-traditional institutions that are found to be in excellent health regarding accreditation standards and expectations.
- The regional accreditors are working together to better align policies and processes. Two examples of this are the 2014 Council of Regional Accrediting Commissions statement: *Regional Accreditation: Warning, Probation, Withdrawal of Accreditation* and the very recent 2015 Council of Regional Accrediting Commissions *Framework for Competency-Based Education*.
- The regional structure of accrediting agencies such as MSCHE continues to be useful and should be maintained. As noted previously, the regional structure allows for continued, meaningful connections and enhanced knowledge about member institutions. In addition, the 2012 American Council on Education Task Force report addressed the issue saying that it would be better to build on the current structure and role of regional accreditors.
- We support a continued link between accreditation and participation in federal programs. This link allows higher education participants and the public to have reasonable assurance that institutions meet appropriate standards of quality and integrity.

Suggestions to Improve Accreditation:

While accreditation is fundamentally sound, it –like most things – could be improved, and the reauthorization process provides a forum for considering improvements that would increase the value of accreditation. What follows is an identification of some of the current issues in accreditation together with suggestions for addressing those issues. In order to be effective, some of the solutions might belong in the legislative language. However, many of the suggested solutions do not require that level of attention, and should be accomplished through effective partnerships within the Triad or through other non-legislative means.

Regulations and Compliance:

- One of our biggest problems is the shift in which accrediting agencies have had to devote increasing time, attention and resources to compliance with the accumulation of federal regulations. This shift has come at the expense of our original mission centered on

quality and institutional improvement. The focus should be where our expertise lies, on quality and improvement. MSCHE and some of the other regional accrediting agencies have begun to separate traditional quality assurance functions from compliance aspects that are required by Congress or the Department of Education in order to clarify the difference in these separate roles.

- There are numerous instances where accrediting agencies have been asked to take on too much responsibility for enforcing compliance with an ever increasing list of federal regulations. Substantive change provides an example. Accreditors must now devote substantial attention to all manner of large and small substantive changes. Most regional accrediting agencies are dealing with hundreds, and in one or two cases thousands of substantive change requests each year. Decisions need to be made about which substantive changes are really related to educational quality and therefore require careful review by accrediting agencies.
- There clearly does need to be a careful approval process for accrediting agencies. However, recognition of accrediting agencies through NACIQI has become a burdensome and bureaucratic process. Under the Department of Education's *Guidelines for Preparing/Reviewing Petitions and Compliance Reports*, accrediting agencies are subject to a total of approximately 100 separate requirements. We are cautiously optimistic about recent efforts to limit reviews to the most important of the requirements and hope that the changes will become permanent. We also believe that there has to be a better way to determine whether an agency is worthy of recognition – perhaps one that would emphasize self-study and improvement rather than compliance.

Accreditation and Innovation:

- Accreditation occasionally is criticized as a barrier to innovation, but the most serious impediment we face with respect to creativity and reasonable experimentation by our institutions is the rigidity of the federal regulations that do not permit us to be flexible and nimble in supporting innovation by our members.
- It should be our responsibility to accommodate innovation while assuring that appropriate levels of quality are maintained. One way to do this might be to allow accrediting agencies some form of waiver or authority from the Department to allow for experimental programs/innovation outside the Department's own experimental sites programs. This could have the benefit of speeding up the process of finding new "best practices."
- At this point, there does not seem to be anything even approaching consensus about how to deal with third-party providers of education. Institutions are increasingly turning to arrangements/partnerships with such organizations and while regional accrediting agencies do engage as necessary, further discussion among all constituencies and a search for agreed-upon approaches would be beneficial to all. We need to determine whether appropriate quality review structures are already available (e.g., regional accrediting

agencies working with institutions that accept credit offered by third-party providers, or via organizations that allow providers to have their courses evaluated for recommendation as to whether academic credit should be considered by receiving institutions), or whether new pathways to accreditation might be best.

Transparency/Disclosure:

- The issue of transparency or disclosure is a thorny one in accreditation. The prospect of full disclosure of self-study documents probably would fundamentally change the nature of those documents. Additionally, while public institutions are used to operating in conditions of greater public access to information, the issue represents a special problem for private institutions. We should focus on the purposes of disclosure – the what, how and when – before making decisions. Perhaps the right balance is that the work product of accreditation should remain protected while consideration should be given to making team reports (or summaries of those reports) public. Full disclosure of accreditation actions has been the practice at Middle States for many years and we believe this is essential.

“One size fits all” Templates, Metrics and Bright Lines:

- We must recognize that a single set of bright lines or metrics will never replace a thorough analysis by peer reviewers of quality in higher education. We need to answer questions about whether our institutions are doing a good job and how we know that they are, but these questions require thoughtful use of data rather than the application of simple metrics. We must be concerned with making decisions about data – What data, collected how and by whom? For what purposes?
- Rather than being satisfied with a number like a graduation rate, wouldn't it be better to determine why students either do or don't complete programs that they start, or to consider available/alternative data about student success? For example, for Thomas Edison State College, a graduation rate statistic is the wrong metric. Graduation rate statistics assume a standard progression through higher education programs and can be more descriptive of a traditional demographic. Alternative information such as pass rates on professional licensure is more meaningful for my institution and the non-traditional student population that it serves...and would reveal a high level of success!

The Triad:

- There should be greater collaboration among the members of the Triad. At present, there are only informal arrangements, and at some level these have not worked well. Improvement here will be essential in order to accommodate innovation.

- Many states have decreased funding for and the “footprint” of governmental agencies that authorize/license institutions of higher education. In some cases, the states have come to rely on the work of the accrediting agencies.
- Without some system or form of incentive to collaborate, the members of the Triad will continue to operate in individual silos.

The Continuum of Accreditation:

- Many see the accreditation process as binary – an institution is either accredited or not. However, there actually are a number of gradations in accreditation decisions. Actions range from accreditation through follow-up to warning, probation, show cause and then to withdrawal. In 2014, the Council on Regional Accrediting Commissions worked to provide a common understanding of sanctioning actions, and it might now be a good time to broaden this discussion.
- Most of our accredited institutions are judged to meet accreditation standards, but some are clearly out of compliance with those standards. However, there is a middle, marginal group where we need to focus our attention to encourage improvement and quality for the benefit of students and the public. Accrediting agencies need flexibility and an appropriate amount of time to work with these institutions.
- The merit of an accrediting agency should never be based on the number of instances accreditation is withdrawn. There are times when there is nothing more an accrediting agency can do and withdrawal of accreditation is necessary, but each time an agency is forced to withdraw accreditation, it represents a kind of failure.
- The revocation of accreditation is an incredibly disruptive and expensive process – for the institution and its students, and for the accrediting agency as well. In the actual event, institutions are likely to close, merge or be sold; the accreditor is likely to be sued; students are displaced; and, in the most disruptive situations, the federal government may have to forgive significant amounts in student loans. Once again, the accrediting agency should have flexibility in dealing with the situation and an appropriate amount of time to work with institutions.

Thank you for this opportunity to testify regarding Accreditation’s Role in Ensuring Quality in higher education.