REPORT TO THE U.S. SECRETARY OF EDUCATION

Higher Education Act Reauthorization

2015 Accreditation Policy Recommendations

U.S. DEPARTMENT OF EDUCATION
NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY

_____/s/_____
Susan D. Phillips Ph.D., Chair

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Introduction

Over the past year, the members of NACIQI identified the need to extend its formal policy agenda. With the **2012 NACIQI Policy Recommendations** over two years old, and with a renewed focus on concerns in higher education and the HEA reauthorization, we set out to identify the new, or renewed, areas about which we would recommend policy change.

To develop our agenda, we drew not only on the **2012 NACIQI Policy Recommendations**, but also on the expertise of a number of policy and thought leaders in higher education through invited policy papers, background readings, and panel presentations. We identified specific areas about which we thought that additional recommendations were needed at this time to simplify the accreditation and recognition process and to enhance nuance in that process, to reconsider the relationship between quality assurance processes and access to Title IV funds, and to reconsider the roles and functions of NACIQI itself. We approached these areas with issues of access, innovation, affordability, and quality in mind. We have not included consideration of what Committee, staff, Department, regulation, or statutory actions would be needed to move these recommendations to implementation.

In advancing the series of recommendations, we commend to the reader the **2012 NACIQI Policy Recommendations**[1], which provides recommendations that remain important to consider. The new set of recommendations, below, represents additional contributions to the larger policy conversation in service of enhancing our higher education system for all students. NACIQI recognizes the value of input from students and other stakeholders in the accreditation process.

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Toward simplifying and enhancing nuance in the accreditation and recognition process

To begin, we noted the wide variance that exists in accreditation terminology, processes, and timelines across accrediting agencies. This variance results in confusion and a lack of transparency and does not appear to serve the public interest well. To address this, we see a need for more conformance across the accreditation process, including 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. We recommend:

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[1] http://www2.ed.gov/about/bdscomm/list/naciqi-dir/2012-spring/teleconference-2012/naciqi-final-report.pdf

1. **Encourage accreditation agencies (both programmatic and institutional) to develop common definitions of accreditation actions and terms procedures, timelines, process (i.e., electronic) including due process and substantive change.**

We also support 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. We recommend:

2. **Require a periodic Departmental review of the criteria for recognition (regulations) with the intent to streamline the regulations, eliminate duplication, and to minimize the regulatory burden. (This recommendation is not intended to limit Departmental review to these areas.)**

We also noted that the current review structure for accreditation, and also for recognition, 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 greater emphasis on student achievement and student outcomes. Specific standards-setting authority within those mission-essential areas lies expressly with the accrediting agency. We recommend:

3. **Re-focus NACIQI reviews to direct greater attention to assessing the role of an accrediting agency in assessing the health and well-being and the quality of institutions of higher education, rather than on technical compliance with the criteria for recognition. These reviews should be supported by staff analysis that focuses on the effectiveness of the accrediting agency in performing its work, rather than technical compliance.**

4. **Direct NACIQI to identify the essential core elements and areas of the recognition review process that accrediting agencies are required to take into account for recognition purposes, focusing on student learning and student outcomes. It is expected that NACIQI would identify both the essential areas to include in the recognition process as well as those to exclude.**

5. **Grant accrediting agencies greater authority to develop standards tailored to institutional mission; to create different substantive tiers of accreditation; and to use different processes for different types of institutions, including expedited processes.**

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

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

In advancing the interest in transparency, we also repeat here a recommendation made in the 2012 NACIQI Policy Recommendations:

7. **Make accreditation reports about institutions available to the public. Further discussion is needed about what reports to include, and about how to increase information and transparency while sustaining other critical values in the accreditation process**

Toward reconsidering the relationship between quality assurance processes and access to Title IV funds

We noted that routes to accessing Title IV funds are currently restricted to existing systems and structures that may not provide sufficient flexibility for innovation and progress. We recommend:

8. **Afford institutions the widest possible array of choice of accreditor for access to Title IV funds, including all place-based accreditors. Encourage place-based accreditation agencies to expand their scope. Provide greater flexibility for institutions to re-align themselves along sector, institution-type, or other appropriate lines. Allow for alternative accrediting organizations.**

We noted the need to provide ways for new and innovative mechanisms of quality assurance to surface and to serve as potential guarantors of quality.

We see an opportunity to create a risk-adjusted approach to accreditation that would free up accrediting agencies and the Department to have more time and resources to focus on institutions that pose the greatest quality concerns. We recommend:

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

We envision that a less burdensome route to Title IV funding access would entail expedited recognition, possibly through a simplified data reporting process. To insure that data is relevant and useful, and that reporting is accurate, we recommend:

10. **Before eligibility for Title IV, require institutions to provide audited data on key metrics of access, cost and student success. These metrics would be in a consistent format across institutions, and easy for students and the public to access.**

Toward reconsidering the roles and functions of the NACIQI

Decisions on many of the recommendations above would be necessary to fully shape a more effective role for NACIQI. Pending that outcome, we think 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. We recommend:

11. **Reconstitute the NACIQI as a committee with terminal decision-making authority and a staff. This will establish NACIQI as the final decision-making authority on accrediting agency recognition. In addition, ensure that the staff recommendation is provided to the NACIQI for its consideration and that the NACIQI decision will be the singular final action communicated to the senior Department official. NACIQI would have authority similar to that of the National Committee on Foreign Medical Education and Accreditation (NCFMEA).**

Finally, we expect that facilitating an improved communications process will require better–defined and clearer communication opportunities between the Department and NACIQI and other policy bodies. We recommend:

12. **Establish that the NACIQI and the Education Secretary and other Department officials meet periodically for mutual briefings and discussions, including policy issues, and resulting in policy recommendations.**

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

<u>Acknowledgments</u>