“Required Reading” (for before the Feb Forum)

- History of recognition and accreditation, and the linkage of recognition to student aid eligibility
- Current issues in accreditation

What is working (and not working) in the current system of recognition, accreditation, and student aid eligibility?

There is a huge (~$150B) federal investment in education. How well does that investment serve us? How well does our current accreditation/ recognition system protect the interests of the taxpayer who is underwriting that investment in education? If we were starting now, would we design this system? How might a system we would design differ from what currently exists?

Our current system draws on a variety of actors, definitions, and processes, which, in turn, poses a number of tensions, points of confusion, and areas of overlap.

- There are commonalities and divergences among notions of “quality assurance,” “continuous improvement,” and “compliance.”
- There is tension between notions of gate-keeping for the availability of student aid, and notions of accreditation as a broader quality assurance and quality improvement process.
- There is confusion and incomplete overlap about compliance with regulation versus accreditation via peer review.
- There are a number of actors: federal, state, professional/trade/membership organizations, and the public—all of whom play varying roles and have varying interests.

Some of the questions that arise from the conjunction of the above, include:

- What should be the role of the federal government? Of the states? Of the trade/professional associations? Of students and families?
- What are the costs/benefits of a system in which accreditors serve as the gatekeepers to federal funds?
- What tensions arise from accreditors specifying a set of standards, and the Department requiring data that address a different set of criteria?
- To what extend does a peer review process serve the compliance/gatekeeping function (or vice versa)?
- Is it possible/desirable to distinguish between “quality assurance” determinations and “continuous improvement” recommendations? Between the minimum acceptable for gatekeeping functions, and the broader quality and/or quality-improvement determination functions.

These “crosscutting questions” also give rise to questions about the actors, definitions, and processes themselves:

RECOGNITION

- Of the current criteria for recognition, which have value/should continue, and which don’t/should not continue?
- Might there be a “tiered” and/or “developmental” approach to recognition (perhaps both an “honors” designation (and interest in disseminating the best practices of these), and a non-accrediting status that designates agencies as not re-recognized but as in process for regaining accreditation authority)?

COMPLIANCE
• Should there be common standards for learning outcomes/student achievement (should the rule of construction stand, or should there be a set “standard” for student achievement?) Who should decide those? How should they be measured?

QUALITY ASSURANCE

• What should be the metrics of quality?
• What benefits (other than access to student aid) accrue in a quality assurance process? Are those benefits worth the costs?

AID ELIGIBILITY

• Can/should the link between student aid and accreditation be severed?
• Should there be separate metrics and/or forms of recognition for compliance with regulation for the purposes of quality determination versus aid eligibility (e.g., an “ROI” model for aid eligibility)?

ACTORS

• What should be the role of accreditation associations? Of the national, regional, specialized accreditors?
• What kind of transparency/public reporting is needed?
• What is the relationship between accreditation and state authorities?
• What implications do costs have for the relationship between the institution and the accreder? For the accreditor and the recognition process?
• What is the value of accreditation/accreditation to its constituencies (consumers/clients/patrons)?
• To what extent does the current system work to the benefit of the consumer’s (student’s) decision making? Is it a useful source of information?

Last, there are questions about the process of considering possible changes:

• Are there other models (from other areas of regulated activity, other countries, other industries) that address these issues better?
• What would we gain/what would we lose by pursuing some of the proposed solutions?
• Would recommendations best be geared to changes that are systemic, comprehensive, and/or polishing?

OTHER TOPICS of interest (may also be raised in the context of the “what’s working/not” list above)

POSSIBLE NEW/ALTERED ISSUES FOR HEA LAW or REG?

• Transfer of accreditation/sale of an accredited institution
• Credit hours (how does one measure credit hours?)
• Length of recognition (Should the recognition period be shortened? (note that staff have concern about this one))
• Fiscal integrity (what standards of fiscal integrity might apply?)
• Student mobility (how can institutions assist the movement of students across institutions?)
• Institutional productivity (should there be set acceptable completion/placement rates? Might the law/regs incentivize institutions to be more productive of college graduates/employed graduates? (note Carnegie Mellon and UMD initiatives))
• Geographic limitations on accreditors and expanding/constraining institutional choice or accredditor?

ISSUES CONCERNING THE IMPLEMENTATION OF REGULATIONS

• Concerns about need for verifiable data review for compliance with Secretary regs, relative to:
  i. concerns that imposing data requests that may be intrusive in terms of academic judgment and burdensome on accreditors
  ii. concerns about a level of conformity and prescriptiveness that may not provide adequate flexibility for the diversity of institutions in US higher education
  iii. concerns about the critical and sufficient data elements that are needed to evaluate the quality assurance process.
• Concerns about the stability of interpretation of review criteria, and about the opportunity for notice and comment on changes in interpretation