

"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 extent 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 accreditor? 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 accreditor?*

ISSUES CONCERNING THE IMPLEMENTATION OF REGULATIONS

- *Concerns about need for verifiable data review for compliance with Secretary regs, relative to:*
 - concerns that imposing data requests that may be intrusive in terms of academic judgment and burdensome on accreditors*
 - concerns about a level of conformity and prescriptiveness that may not provide adequate flexibility for the diversity of institutions in US higher education*
 - 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*