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FEDERAL REGULATIONS AND NATIONAL CONVERSATIONS IMPACTING ACCREDITATION PRACTICES AND POLICIES

HIGH NOON: ACCREDITATION AND THE DEPARTMENT OF EDUCATION

A Presentation by

President Barbara A. Beno, ACCJC and
Vice President Susan B. Clifford, ACCJC

For the

California Community Colleges Chief Instructional Officers (CCCCIO)
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KEY CONTENTS

The presentation discusses key changes to Accreditation Standards and practices between the 2002 and (anticipated) 2014 versions of ACCJC Accreditation Standards.

It also reviews various national and federal pressures, expectations and demands (some misplaced or contradictory) on accreditation.



ACCJC 2002 STANDARDS ADDED:

- Greater focus on student outcomes as indicator of quality
- Increased emphasis on data and analyses, including data on student achievement and student learning outcomes
- Emphasis on culture and practice of assessment and improvement
- Increased emphasis on institutional internal quality assurance systems, integration, decision-making



SINCE 2002, NEW FEDERAL EMPHASES IN THE 2008 HEOA

- Quality and integrity of distance education and continuing education
- Integrity of the Credit Hour
- State authorization, and the role of the triad
- Financial aid integrity
- Accreditor monitoring of financial integrity and academic quality between visits
- Substantive Change reviews



SINCE 2002, DEPARTMENT OF EDUCATION EMPHASES (VARIOUS YEARS)

- Rigor of accreditor decisions
- Two year rule enforcement
- Information to the public and students
- Accreditor requirement that institutions set their own standards for student achievement, etc.
- Accreditor uses information about student achievement in making their decisions



2014 STANDARDS REVISIONS RESPOND TO

- Institutional interests in clarified, simplified Accreditation Standards, reduced redundancies
- Regional and national interests in student completion, time to degree, quality of degree, and appropriate support for student success
- Regional and national interests in “productivity” and student equity
- Congress and the U.S. Department of Education interests



Framework of Institutional Responses Needed to Move Community Colleges Ahead

Move From	Move To
A focus on student access	A focus on access and student success
Fragmented course-taking	Clear, coherent educational pathways
Low rates of student success	High rates of student success
Tolerance of achievement gaps	Commitment to eradicating achievement gaps
A culture of anecdote	A culture of evidence
Individual faculty prerogative	Collective responsibility for student success
A culture of isolation	A culture of collaboration
Emphasis on boutique programs	Effective education at scale
A focus on teaching	A focus on learning
Information infrastructure as management support	Information infrastructure as learning analytics
Funding tied to enrollment	Funding tied to enrollment, institutional performance, and student success

Reclaiming the American Dream: A Report From the 21st Century Commission on the Future of Community Colleges, American Association of Community Colleges, 2012, Page 3, Figure 3.



NEW ECOLOGY FOR HIGHER EDUCATION: CHALLENGES TO COMMUNITY COLLEGE ACCREDITATION*

- New patterns of student participation
- New kinds of providers
- Transformed and contingent faculty
- New approaches to teaching and learning
- Constrained resources, clarity of mission
- A global higher education system

*A paper by Peter Ewell for the ACCJC, available at www.accjc.org.



ACE REPORT ON ACCREDITATION*

- Increase transparency and clearly communicate results of accreditation
- Increase centrality of evidence about student success and educational quality
- Take prompt, strong action against substandard institutions

*Assuring Academic Quality in the 21st Century: Self Regulation in a New Era



ACE REPORT ON ACCREDITATION *CONTINUED*

- Adopt a more “risk sensitive” approach to regional accreditation
- Seek common terminology, promote cooperation and expand participation of college leaders
- Enhance the cost effectiveness of accreditation



NACIQI (24) RECOMMENDATIONS*

- **9** Allow accreditors to distinguish between high performing and more “at risk” institutions
- **10** Expedite accreditation reviews for the high performing institutions
- **11** Allow accreditors to use more gradations in awarding accreditation to institutions, depending on their quality
- **12** Make USDE regulatory criteria less prescriptive, intrusive and granular

*Higher Education Act Reauthorization: Accreditation Policy Recommendations, April 2012



NACIQI (24) RECOMMENDATIONS

- **13, 14** Reconsider data used for accreditation, try to use existing data and analyses
- **19** Revise IPEDS to make it more useful, timely
- **15, 16** Develop a set of metrics that could be used in all accreditation reviews, serve as minimum data for accreditation on completion, graduation, licensure or job placement, other indicators of career progress



NACIQI (24) RECOMMENDATIONS

- **17** Audit data that is central to eligibility for F.A. and to consumer decisions to assure accuracy
- **18** Consider how data on completion could be gathered in a privacy-protected manner (e.g., through a non-governmental organization such as the National Student Clearinghouse)
- **20** Make accreditation reports available to public



HE FLEXIBILITY VS. USDE REQUIREMENTS

- Competency based education, credit by exam vs. USDE focus on Credit Hour and seat time
- Innovation and new institutional configurations vs. USDE requirement of prior substantive change approval, tracking each new program implemented
- New uses of technology vs. USDE focus on quality of online learning and support services, extra scrutiny of DE
- Demand for capacity vs. USDE increase in focus on for-profit higher education quality



REAUTHORIZATION BEGINS IN 2013

- Continuing evolution of Congressional and public understanding of and beliefs about higher education, institutions and accreditors will impact HERA 2013
- Concerns with abuse and stepped up regulatory environment focused on:
 - Student readiness, truthfulness of admissions processes
 - Student financial aid and student retention, completion
 - Utility of degrees for preparing people for jobs
- An interest in new forms of education



WHAT IS AHEAD? SIX IDEAS

Six Ideas about Legislative, Regulatory Changes
And Changes to ACCJC Practices



TRANSPARENCY

- More information on accreditation outcomes for public
 - Expansion of the Public Disclosure Notice
- More information on institutional performance for public
 - More emphasis on 602.16 (a) “accreditors address success with respect to standards, as set by the institution, for **course completion, program completion, State licensing examination, and job placement rates.**” (paraphrased)
- More accreditor explanation of what distinguishes a “quality” institution from others
- Possibly a push for accreditors to describe the quality of learning that institutions provide, or compare institutions



METRICS AND MEASURE

- Definitions of inclusive “graduation” or “completion” rate
- Time to degree calculations, FT and PT
- Some common national metrics for CCs (AACC)
 - Some common metrics used by regional accreditors within or between regions
- Some pressures toward institutions reporting to the public the learning outcomes data they have



FOCUS ON STUDENT PATHWAYS

- More structure, direction of students
 - Defined pathways to completion, including pre-collegiate education
 - Incentives and limits on aid that improve time to completion
 - Focus on quality of student advising, counseling, education plans
 - Possible focus on course offerings and course sequencing
 - Possible requirement that accreditors examine how well each institution achieves each of its missions



NEW PEDAGOGIES AND ENTITIES

- Accreditation of agencies that assess and assign credit for such things as MOOCs, credit by exam
- More flexibility in transfer of credit for prior learning
- More focus on the evaluation of learning in online courses and degree programs
- Policies on contractual relationships with non-accredited entities such as test taking centers, support service providers, etc., un-bundling occurs



ADAPTIVE ACCREDITATION REVIEWS

- Lighter touch for high performing institutions
 - ❑ More variables reported between visits for low performing colleges, those without strong accreditation histories
 - ❑ Possibly a longer accreditation for high performing colleges
- Possible use of specific metrics to “define” high performing institutions – some of that emerging in evaluation of financial management/stability now
- Possibly more public information about higher performing colleges



ENHANCED GATEKEEPING

- Pressures on accreditors to improve “gatekeeping” and reduce substandard institutions’ access to \$; removal of accreditation from underperforming institutions
- Possibly additional accreditation “statuses” to distinguish high performing institutions from more “fragile” institutions
- More information about institutional deficiencies to the public



WE HAVE THREE “ASIDES” IF YOU ARE INTERESTED

- Substantive Change Requirements
- Institution-set standards for student achievement, use of same in accreditation reviews
- Annual Report Form and letter



SUBSTANTIVE CHANGE

- Some changes the Commission considers substantive
 - Offering a third year of a program
 - Change in the name or mission of the institution
 - Closure of an Institution
 - Opening an additional location (50% rule)
 - Addition of new programs, certificates, degrees
 - Change in the control of an institution



SUBSTANTIVE CHANGE *CONTINUED*

- Merging with another institution
- Contracting for delivery of course or programs
- A change from clock hours to credit hours
- Change in mode of instruction (DE/CE) (50% rule)

Certain types of substantive changes could trigger a site visit by Commission representatives.



INSTITUTION-SET STANDARDS OF STUDENT ACHIEVEMENT

34 CFR § 602.16(a)(1)(i). Accreditation Standards must address success with respect to student achievement in relation to the institution's mission... including as appropriate course completion, licensing examinations, and job placement rates.



STUDENT ACHIEVEMENT DATA REVIEW

34 CFR § 602.17(f). [Accrediting] Agency reports must assess institutional performance with respect to institution-set student achievement standards.



SETTING INSTITUTIONAL STANDARDS

- The institution must demonstrate that it:
 - Establishes standards for its own performance
 - Analyzes how well it is meeting its own standards
 - Makes results available to all constituent groups
 - Plans to improve in areas where its own performance is inadequate



INSTITUTION-SET STANDARDS OF STUDENT ACHIEVEMENT

- Institutions must set standards for satisfactory performance of student success (student achievement and student learning)
- Commission will examine the standards and assess their appropriateness



STUDENT ACHIEVEMENT DATA REVIEW

The Commission will examine the institution's analysis of performance, using student achievement data, and will note both effective performance and areas in which improvement is needed. External evaluation teams will determine whether or not the institutional-set standards are appropriate.



THANK YOU

Dr. Barbara A. Beno, ACCJC President

Dr. Susan B. Clifford, ACCJC Vice President

accjc@accjc.org

www.accjc.org