

**ACCREDITATION AS QUALITY ASSURANCE:  
MEETING THE NEEDS OF 21st CENTURY LEARNING**

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**HEARING**  
OF THE  
**COMMITTEE ON HEALTH, EDUCATION,  
LABOR, AND PENSIONS**  
**UNITED STATES SENATE**  
**ONE HUNDRED THIRTEENTH CONGRESS**  
FIRST SESSION  
ON  
EXAMINING ACCREDITATION AS QUALITY ASSURANCE, FOCUSING ON  
MEETING THE NEEDS OF 21ST CENTURY LEARNING

DECEMBER 12, 2013

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Printed for the use of the Committee on Health, Education, Labor, and Pensions



Available via the World Wide Web: <http://www.gpo.gov/fdsys/>

U.S. GOVERNMENT PUBLISHING OFFICE

22-269 PDF

WASHINGTON : 2016

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LEARNING**

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**THURSDAY, DECEMBER 12, 2013**

U.S. SENATE,  
COMMITTEE ON HEALTH, EDUCATION, LABOR, AND PENSIONS,  
*Washington, DC.*

The committee met, pursuant to notice, at 10:04 a.m. in room SD-430, Dirksen Senate Office Building, Hon. Tom Harkin, chairman of the committee, presiding.

Present: Senators Harkin, Alexander, Franken, Murphy, and Warren.

OPENING STATEMENT OF SENATOR HARKIN

The CHAIRMAN. Good morning, everyone.

The Senate Health, Education, Labor, and Pensions Committee will come to order.

First, before we get started, I am informed that we are going to have two votes starting in about 1 hour; 10:55 maybe 11 o'clock. So what we will do is continue the hearing. We will take a break. There will be two votes. What I will do is go over for the end of the first vote, the beginning of the second vote, and then come back. So we can expect a break in a little over an hour from now—maybe an hour and 10 minutes from now in the proceedings.

Today's hearing is the fourth in our series examining critical issues in postsecondary education in anticipation of reauthorization of the Higher Education Act. I said at our first hearing that we would spend time examining each player in the regulatory triad that oversees colleges. So today, we will take a close look at our accreditation system.

Accreditation's role is to help ensure an acceptable level of quality across a wide spectrum of American higher education. Under the Higher Education Act, accreditation is required for institutions to access Federal financial aid. Students are eligible for Federal student aid only if they attend an institution that is accredited by an accrediting organization recognized by the Department of Education. Consequently, accrediting agencies are considered the gatekeepers of Federal financial aid, and are tasked with helping institutions continuously improve based on their missions, while also overseeing their quality.

As we look to reauthorize the Higher Education Act, we have the opportunity to reassess the law and ensure that we have an accreditation system that meets the needs of today's students and tax-

payers. We need to examine whether the current accreditation system sufficiently guarantees the quality of education that students receive at postsecondary institutions. We also face the challenge of improving the system to ensure it can adapt to a rapidly changing 21st century higher education system.

In recent committee hearings, I have raised serious concerns about the ability and capacity of our accreditation system to effectively monitor over 7,000 institutions of higher education of various scope, mission, and size. I have also identified potential, and I think in some cases, real, actual conflicts of interest.

In recent years, we have seen too many instances of students and taxpayers shouldering the burden and consequences of poor oversight. While we heard from some accreditors in the course of the committee's hearings on for-profit colleges, today's hearing offers the first opportunity to look across all types of accreditation and at the system as a whole.

I hope we can have a robust discussion about the current status of accreditation in U.S. higher education. We will look to our panel of witnesses today to give us their views on what improvements should be made. We have a great opportunity today to examine the strengths and weaknesses of accreditation, and to clarify what we expect from it. This examination will influence our thinking as we reauthorize the law, hopefully, next year.

I look forward to working with our distinguished Ranking Member, Senator Alexander, and my other colleagues on both sides of the aisle to ensure that our higher education system remains affordable, accessible, and results-oriented, both for the students and our taxpayers.

With that, I invite Senator Alexander for his opening remarks.

#### OPENING STATEMENT OF SENATOR ALEXANDER

Senator ALEXANDER. I want to welcome our witnesses, and thank Chairman Harkin for this hearing. I especially appreciate the even-handed way he has approached all of these subjects on higher education, and I look forward with him to doing our best to try to reauthorize Higher Education next year.

I am glad we are looking at the role of accreditation in all types of the 6,000 or 7,000 higher education institutions we have. I think it is important to look back at where accreditation came from to see what its central purpose is, whether the accreditors are fulfilling that role, what is the Federal Government's role in accreditation, and has the Federal Government overstepped to the point that accreditors are not doing what they were designed to do?

It is worth it to me to go back to where accreditation started. The first accrediting agencies emerged more than 120 years ago in the late 1800s. That was a very different time. There were not many colleges; most of them were private. They had abandoned the classical curriculum and some were adopting the new elective system. There were new types of institutions. It was not even clear what the difference was between a high school and a college. And so, the accrediting agencies' first role in that phase was to help create common admission standards so you could decide what was a high school and what was a college. The first effort at that was in 1885.

At the turn of the 20th century, Mr. Chairman, when all this was going on, fewer than 13 percent of Americans were completing high school and less than 3 percent were completing college degrees, and there was not any Federal involvement at all in any of that.

Then the G.I. bill came in 1944, money for veterans, they could even spend the money at high schools. And the number of people going to college doubled, but still, it was not really very many.

Then the Korean War came, and the Korean War G.I. bill specified that institutions of higher education needed to be accredited by federally recognized accreditors in order for a veteran to spend money there. So it began to tie the Federal Government to the existing institutions. And at that time, only about 35 percent of students were graduating from high school and 6 percent were completing college; that is the time of the Korean War. So this is where this all came from.

State approval of institutions was enough, everybody thought, for all of these higher education institutions. That pretty well lasted until 1965, when the Federal student aid could only go to institutions recognized by a federally recognized accreditor; that was the 1965 Higher Education Act. That tied eligibility to receive Federal aid to Federal regulation, but the law pretty well remained silent.

This page, Mr. Chairman, is the entire amount of Federal law on accreditation in the Federal Government in 1952, at the end of the Korean War. And this is what it is today. This is not so bad compared to most higher education regulations. This is the law. This is the regulations. These are the sub-regulations, but still quite a bit. And I think one of the things we want to know is, is all of this necessary?

In our previous hearings, I have suggested that through no evil intention of everybody, we have reauthorized higher education, I think, eight times since 1965 and maybe we have done just some piling on of laws and regulations without thinking about what could be removed. And I will be interested to see what you think about whether we are adding unnecessary cost to institutions and delays to institutions by the Federal requirements.

Briefly, in 1992, and I was Education Secretary at that time, the reauthorization of the Higher Education Act and Senator Kennedy was particularly involved in this. Senator Harkin was on the committee at that time and defined the areas that accreditors needed to examine. And by then, 80 percent of Americans were completing high school and 21 percent completing college, and that language was modified and expanded in 1998 and 2008. So now we have 93 different criteria that accreditors must consider when determining institutional quality.

I think the main point to make, Mr. Chairman, and I will bring my remarks to a conclusion so that we can hear from our witnesses, the whole purpose of accreditation to begin with was an effort by autonomous institutions to regulate themselves for the sole purpose of determining quality.

The Federal Government then, understandably, because we spend a lot of money to help students said, "Well, we want to make sure they are going to proper institutions." And so, we have gotten involved in giving the accreditors more to do. I think we have to think about: have we asked the accreditors to do some things that

they should not be doing? Are the accreditors doing some things they do not need to be doing? And are they spending enough time really focused on quality?

At Vanderbilt University, they estimate its College of Arts and Science devote more than 5,000 hours to accreditation-related work every year. And that its School of Engineering devotes up to 8,000 hours of work every year on accreditation. That is probably way too much.

We are looking for advice and we are trying to work together to sort through what has been done. I appreciate the chairman giving me a little more time to talk about this, but I have watched it from various angles. From the angle of a university president, and an education secretary, and a Governor. I have gotten pretty mad at accreditors sometimes when they came in and told me what to do that I did not think needed to be done, for example, at the University of Tennessee.

I welcome your testimony. I thank the chairman for the hearing, and I look forward to the opportunity to ask questions.

The CHAIRMAN. Well, thank you very much, Senator Alexander. Now you can see why Senator Alexander is such a vital part of this committee. He does have the background, the expertise, the knowledge, the intelligence to really help us weave our way through all of this. I want the Senator to know how much I appreciate his leadership and guidance in working together on these important issues.

Senator ALEXANDER. I hope I did not take too long.

The CHAIRMAN. Oh, it was great. I enjoyed it. I thought it was great.

Thank you all very much for being here and we will start now with our panel. We have four witnesses today. I will introduce them.

Dr. Arthur Levine, is the sixth president of the Woodrow Wilson National Fellowship Foundation, previously was president and professor at the Teacher's College, Columbia University; and also served as chair of the Institute for Educational Management. A member of the American Academy of Arts and Sciences, also sits on the board of the Educational Testing Service; earned his bachelor's degree from Brandeis and Ph.D. from the State University of New York at Buffalo.

Dr. Ralph Wolff, former president of the Western Association of Schools and Colleges, joined the staff of the Western Association of Schools and Colleges senior college and university commission in 1981, and served as its president from 1996 through August 2013, currently serving as an advisor to them. That is the regional accrediting body for more than 160 colleges and universities. Over the last 30 years, Dr. Wolff has led revisions to accreditation standards and has addressed such key issues as the changing ecology of learning, retention, and graduation, student learning outcomes, the changing world of faculty in for-profit institutions. A graduate of Tufts, he received his J.D. from the National Law Center at George Washington University.

Next is Dr. Daniel Phelan, served as president of Jackson College in Jackson, MI since 2001. Previously served as president of the Southeastern Community College in West Burlington, IA and also served as executive vice president of Education and Student Serv-



ices at Western Nebraska Community College. Dr. Phelan serves on the executive committee of the American Association of Community Colleges, and serves as chair of the Committee on Public Policy and Government Relations. He holds a bachelor's degree in business administration from Mount St. Clare College in Clinton and a doctorate from Iowa State University.

Finally, I would like to introduce Ms. Laura King. Ms. King has served as the executive director of the Council on Education for Public Health since 2004. Her career spans nearly 20 years in public health, most of which has focused on quality assurance in higher education and public health-related professional fields. Among her many roles, Ms. King provides consultation to universities interested in establishing a public health degree program and pursuing accreditation. Her other professional positions have included serving as Outreach and Education director at Physicians for Social Responsibility, as well as positions focusing on clinician education at George Washington University's Medical Faculty Associates. She earned her bachelor's degree in psychology from American University, her MPH from the George Washington University School of Public Health and Health Services, and I understand you are currently pursuing a doctoral degree from Northeastern University in Boston, MA.

We have a distinguished panel. First, I thank you all for your past service to higher education and for being willing to join with us today to give us some of your thoughts and suggestions on where we should be headed when we reauthorize the Higher Education Act.

All of your statements will be made a part of the record in their entirety. I will start with you, Dr. Levine, and we will go down the panel. If you could sum up in 5 to 7 minutes, I would appreciate it, and then we can get into a discussion.

Dr. Levine, welcome and please proceed.

**STATEMENT OF ARTHUR LEVINE, Ph.D., PRESIDENT, WOODROW WILSON NATIONAL FELLOWSHIP FOUNDATION, PRINCETON, NJ**

Mr. LEVINE. Good morning. Thanks for inviting me.

Senator Alexander just offered an excellent summary of the history, the evolution, and the challenges facing accreditation in America. We have a system that consists of four different kinds of agencies. There are regional, there are national, there is religious, there are specialized accrediting associations, and they have four different purposes.

The first is to set minimum standards for institutions and programs, and provide mechanisms to enforce them. The second is to build institutional or programmed capacity for continuous improvement. The third is to establish quality assurance for third parties. The fourth is to provide consumer information.

I think the current system of accreditation overall works, but it is facing significant challenges, and I want to talk about three today.

The first is there are too many accrediting agencies. Their standards vary widely. Some are too low; that is an increasing liability in a global digital information economy with growing numbers of

postsecondary providers and technologies that span borders. Accreditation has got to be updated to meet the needs of an educational system that is facing dramatic changes in demographics, technology, economy, and globalization, and that is easier to say than to do.

The second challenge is that accrediting focuses principally on the quality floor, minimum requirements to achieve approval. We need to pay more attention to what might be called the ceiling: rankings such as “meets standards,” “exceeds standards,” and “substantially exceeds standards,” need to be added.

The third challenge is that accreditation needs to shift its focus, which is now largely on process, to a greater emphasis on outcomes: graduation and placement rates, student loan debt, student achievement.

Accreditation was created for an industrial society and it now has to adapt to an information economy that requires increased postsecondary attainment and affordability.

So what do we do? Do we repair or do we replace the current accreditation system? And I suggest repair.

Recent changes in the Council for the Accreditation of Educator Preparation, I can show what is possible. CAEP, which is what it is called, recently redesigned teacher education accreditation to meet the needs of the 21st century. They merged two existing organizations and thereby established a common floor, a common set of standards for the entire profession. They extended the pool of teacher education providers to be accredited to include universities and non-universities, to include for-profit and not for profit and thereby encompass the totality of providers to raise the floor for accreditation. Require a “B” average to enter a teacher education program and performance in the top third on standardized tests. It required more rigorous teacher education. For instance, they are asking for intensive clinical experiences in teaching.

It created a ceiling for teacher education, establishing a series of rankings including “exemplary.” It required outcomes data for accredited institution on student performance in graduate classes. What have students learned, not what a student has been taught.

It also mandated annual reporting of data such as graduation rates, placement rates, pass rates on licensure exams, and default rates, as well as surveys of employers and graduates. It is an early warning system for when institutions are off-track. At bottom, all CAEP did was modernize and raise standards.

The United States is making a transition from a national analog industrial economy to a global digital information economy. Every one of our social institutions, whether it be accreditation, or universities, or schools, or governments were created for the former and they seem broken today. They do not work as well as they once did, and they need to be refitted for a new era.

The Federal Government can encourage the kind of initiative and the kind of change that is needed in accreditation with carrots and sticks. The carrots could be i3, Investing In Innovation, type funding for accrediting associations who take the type of actions that are needed. The stick is changes in recognition requirements which could be accomplished in cooperation with the accreditors.

In short, I think we can. I think we have to repair, not replace, the current system.

Thanks for inviting me to talk to you today. I look forward to your questions.

[The prepared statement of Mr. Levine follows:]

PREPARED STATEMENT OF ARTHUR LEVINE, PH.D.

SUMMARY

As requested, this testimony addresses the structures and functions of accreditation, 21st-century changes in postsecondary education that demand changes in accreditation, areas for improvement in accreditation, and the recent success of the Council for the Accreditation of Educator Preparation in addressing those needs.

Accreditation in postsecondary education has four functions—establishing minimum quality standards, building institutional or program capacity, assuring quality for third parties, and providing consumer information. The testimony discusses challenges in each area.

This testimony describes dramatic changes in the Nation—demographic, economic, technological and global—that will produce major changes in postsecondary education and require comparable changes in accreditation.

The testimony offers six suggestions for accreditation action: (1) Expand the scope of institutions eligible for accreditation, based more on student enrollment choices than on institutional characteristics such as degree-granting status; (2) Follow student academic careers to gauge the nature of their educational progress in a system in which they may study with multiple providers; (3) Develop common standards for regional accrediting associations in order to avoid non-traditional providers shopping around for the easiest accretor, as well as to provide a common or shared set of standards for postsecondary education and greater cohesion in the current patchwork system of accreditors; (4) Develop additional categories for accreditation—meets standards, exceeds standards, substantially exceeds standards—in order to go beyond the floor accrediting currently focuses upon, to aid institutions in capacity building, and to inform consumers, with ratings in key areas such as academics, governance and finances as well as an overall assessment; (5) Place primary emphasis on the outcomes of postsecondary education rather than its process, determining key data to be collected by institutions and programs, and create a vehicle for providing more frequent updates to accreditors and reducing the burdensome paperwork, hubbub and cost associated with accreditation, and (6) Plan for an outcome- or competency-based system of postsecondary education.

The recent transformation of teacher education accreditation by the Council for the Accreditation of Educator Preparation is offered as a model for the improvements in accreditation that are both needed and possible. Suggestions are made regarding how the Federal Government can expand such initiatives.

Senators Harkin, Alexander and Colleagues: Thank you for inviting me to appear before you. Today, as requested, I will address the structures and functions of accreditation, 21st-century changes in postsecondary education that demand changes in accreditation, areas for improvement in accreditation, and the recent success of the Council for the Accreditation of Educator Preparation in addressing those needs.

THE STRUCTURE AND FUNCTIONS OF ACCREDITATION

Accreditation in postsecondary education is a system of peer-review begun in the late 19th century. It now includes six regional accrediting agencies that focus on whole institutions, largely degree-granting and not-for-profit, in their geographic area; more than 50 national accrediting agencies which have been concerned largely with vocational, technical and career institutions that may offer degrees or certificates; and a cornucopia of specialized accreditors that are field—and profession-specific. A small number of religious institution accrediting agencies exist as well.

Accreditation is designed to perform four functions—setting minimum institutional or program standards, building institutional or program capacity, assuring institutional or program quality for third-parties such as the States and Federal Government, and providing consumer information.

• **Setting minimum institutional or program standards.**—The rationale for accreditation is to enable postsecondary institutions to engage in self-regulation by establishing explicit standards for themselves and creating a mechanism to enforce them. At the moment, those standards operate as a floor, delineating the minimum

quality necessary for institutional or program acceptability. It would be desirable to create something more akin to a ceiling. This might be accomplished by shifting from the current pass-fail system of accreditation with gray areas in between to a system including varying levels of pass such as meets standards, exceeds standards, and substantially exceeds standards. Rather than giving institutions or programs a single grade of pass or fail, they could be rated in each of the key accrediting areas—students/access and graduation rates, program quality, governance, and so on—as well as receiving an overall rating. The large number of accrediting agencies also means considerable variation in the nature and quality of the floor.

- **Building institutional or program capacity.**—For all intents and purposes, this is the way that accreditation has worked to create a ceiling. However, the result is a hazy system which appears to be the equivalent of “let a thousand flowers bloom.” A more differentiated system of ratings could be a vehicle for adding rigor to capacity building if it allows for institutional diversity.

- **Establishing quality assurance for third parties.**—The most powerful form of third-party reliance is qualification for Federal financial aid. This is a mixed blessing. On the one hand, it is an acceptance of professional self-regulation in postsecondary education. On the other, it makes accreditation a high-stakes determination, which means giving the benefit of the doubt to institutions and programs and thereby lowering the floor. Providing realistic alternative routes to financial aid is the only possible ameliorative.

- **Providing consumer information.**—It has been suggested that accreditation provide the same sort of information as *U.S. News and World Report* or the popular college guides. This would be unfortunate in violating the confidentiality essential to self-regulation and peer-review. However, publicly releasing more differentiated ratings and requiring all accredited institutions and programs to release standardized data in key areas such as access and graduation rates would make an important contribution.

#### 21ST-CENTURY CHANGES IN POSTSECONDARY EDUCATION AND IMPLICATIONS FOR ACCREDITATION

Shifts in demographics, economics, technology, and globalization are likely to change who is going onto postsecondary education, the characteristics of postsecondary education, and the interaction of students and postsecondary institutions.

##### *Student Demographics*

Traditional students—18 to 22 years of age, attending college full-time and living in residence—now constitute considerably less than a third of undergraduates. The percentage is likely to decline further as the price of college rises beyond the means of most families and as continuing education mushrooms, with baby boomers retiring and work demanding more frequent updates to skills. Today’s traditional students are more consumer-oriented than their predecessors, expecting institutions to meet all of their wants—academic, counseling, room, board, support services, technology and social life. This is encouraging an expensive competition among institutions to add the newest and largest bells and whistles.

The emerging majority in higher education are part-time, working, and over 25 years of age. They are seeking institutions which offer them convenience, service, quality education, and low-cost. They are unwilling to pay for facilities, programs and services they do not use—fitness centers, elective courses, and intramural sports. They are prime candidates for stripped down versions of higher education, offered by online and non-traditional providers such as University of Phoenix and Kaplan, among others.

This demand for such education is likely to accelerate in today’s global information economy in which the half-life of knowledge is growing shorter and shorter, causing students to return to postsecondary institutions throughout their lives, seeking just-in-time rather than just-in-case instruction, tailored to their personal needs in content, calendar, and learning style.

The migration patterns of Americans will also have an effect on higher education. Americans are moving from the Northern and Eastern regions of the country to the South and West. The Sunbelt is growing quickly due to this shift and immigration, creating a mismatch between the availability of higher education and student demand, particularly in California. This is likely to bring an influx of non-traditional, for-profit, and out-of-state higher education providers to the region to meet the need, which promises to exacerbate the condition of Hispanic, Black, American Indian and Southeast Asian populations as well as the poor, who have low high-school graduation, college attendance, and college completion rates. Even those who attend college are likely to be over-represented in non-university-based postsecondary education.

*Postsecondary Providers*

The years ahead are likely to bring a dramatic expansion in the number and types of education providers. They will be for-profit and not-for-profit; brick, click, and brick and click; local, national, and international; and combinations thereof.

This will be propelled by a for-profit community that views higher education as the next health care, an industry in need of a makeover because it is high in cost, inadequate in leadership, low in productivity, and weak in technology use. Higher education is also attractive to the profit-making sector because it is a growth industry, countercyclical in enrollment, subsidized by government, dependable in cash-flow, and a long-term purchase.

The convergence of knowledge producers will further spur the growth of non-traditional education providers. Today, content and technology companies—publishers, software and hardware makers, media companies, libraries, museums, and universities—are all trying to build their market using the same technologies and creating products that look increasingly like courses.

*Students and Postsecondary Providers*

The expansion of the postsecondary sector will offer students far greater choice in where, what and how they study. One can expect more mixing and matching—that is, studying at a variety of different traditional and non-traditional institutions, which can be expected to distinguish themselves by area of specialization, length of their courses of study, choice of instructional delivery systems, and cost. This, combined with advances in brain research with regard to learning and the development of software tied to those advances, will permit students to select the course of study most consistent with their personal needs and learning styles. Instruction is likely to be available to students 24 hours a day, 7 days a week at the location of their choice—at home, at work, on the commuter train, on vacation, in the hotel room. Postsecondary education is for the most part provider-driven. In years ahead, it will become increasingly consumer-driven in the manner of media.

Today, higher education is largely time-based. The amount of time in a classroom determines the number of credits earned, which when accumulated in sufficient number results in a degree. The idea of tying education to the clock makes less sense today. We recognize that all people learn at different rates and each person learns different subjects at different rates.

The shift of America from an industrial to an information economy is speeding this realization and action upon it. Industrial economies focus on establishing common processes and the American university with its course-credit system came of age during the industrial era. In contrast, information economies are concerned with outcomes. Process and time are variables. This is profound change, shifting the focus of education from teaching to learning. All of our educational institutions, pre-k through graduate school, are being pushed reluctantly in this direction by government, which is demanding specific outcomes data and accountability. Pre-collegiate education is adopting this approach much more quickly than higher education, which ultimately will have the option of developing its own metrics or having the metrics thrust upon it by government.

Combine this with the expansion of non-traditional providers and the diversity of their educational offerings. Students, in the course of their postsecondary lives, are likely to have had an assortment of learning experiences which may vary from a few hours to several years offered by a host of different providers. This does not translate easily into credits and degrees. Moreover, postsecondary training by employers is more likely to focus on mastery than time. As a result, given society's shift from process to outcomes and the lack of common meaning associated with academic degrees beyond time served, it would not be surprising to see degrees wither in importance in favor of competencies, detailing the skills and knowledge students have mastered. Every student would have a lifelong transcript or passport in which those competencies are officially recorded.

## IMPLICATIONS FOR ACCREDITATION

The preceding observations are an attempt to read the tea leaves. They mark critical areas for change in accreditation. Several suggestions follow—some relate to the postsecondary system largely as it exists today and others to planning for more substantial changes in the future.

- Expand the scope of institutions eligible for accreditation based more on student enrollment choices than institutional characteristics such as degree-granting status.
- Follow student academic careers to gauge the nature of their educational progress in a system in which they may study with multiple providers.

- Develop common standards for regional accrediting associations in order to avoid non-traditional providers shopping for the easiest possibility, and also to provide a common or shared set of standards for postsecondary education and greater cohesion in the current patchwork system.

- Develop additional categories for accreditation—meets standards, exceeds standards, substantially exceeds standards—in order to go beyond the floor that accrediting currently establishes; to aid institutions in capacity building; and to inform consumers. Institutions should receive ratings in key areas such as academics, governance and finances as well as an overall assessment.

- Place primary emphasis on the outcomes of postsecondary education, determining what data institutions should provide to the accreditor and what information to the public. This could be a vehicle for providing more frequent updates to accreditors and reducing the paperwork, hubbub, and cost associated with accreditation, all of which are substantial today.

- Plan for an outcome- or competency-based system of postsecondary education. What would competency-based postsecondary education look like? What is the definition of a competency? How can we insure that competencies go beyond vocational skills and knowledge to include civic and personal outcomes? (The danger is that higher education will “unbundle” in the same fashion as media with the possible loss of essential activities and services.) What are the appropriate assessment and transcript recording mechanisms and actors? Should institutional accreditation be rooted in the competencies a postsecondary institution seeks to achieve? What is the meaning of traditional process concerns in outcome- or competency-based education in areas such as facilities, teaching methods, the role and kinds of faculty employed, support service such as libraries and staffing? Where does responsibility for access, completion, employment, financial aid, and so on rest in a world in which students may have educational experience with a host of providers? What role should accreditors play as these changes unfold—shaping or reacting? My preference is leading.

THE COUNCIL FOR THE ACCREDITATION OF EDUCATOR PREPARATION (CAEP):  
A MODEL FOR REFORMING ACCREDITATION FOR THE 21ST CENTURY

CAEP is a product of the merger of two specialized accrediting associations—the National Council for the Accreditation of Teacher Education and Teacher Education Accrediting Council. Based upon a major study of teacher education in America, I had been very critical of the oldest and largest of the two accrediting agencies, the National Council. My study found very low standards for accreditation; a higher proportion of less selective than highly selective institutions accredited; no significant differences in achievement between the classes of graduates of accredited and unaccredited institutions; employment of cookie-cutter process-based criteria for accreditation rather than outcomes; and expensive and heavily time-consuming accrediting requirements.

CAEP redesigned teacher education accreditation to meet the needs of the 21st century. In merging the two existing accrediting associations, it established a common set of standards for teacher preparation. It expanded the pool of teacher education providers to be considered for accreditation to include all providers. It raised the floor for accreditation, requiring, for example, that students admitted to teacher education programs have at least a B average and test scores on nationally normed exams in the top third by 2020. It required a more rigorous teacher education program, demanding, for instance, an intensive clinical experience. It created a ceiling for teacher education, establishing several rankings for accredited institutions which included exemplary programs. It required outcome data for accredited institutions on k–12 student performance in graduates’ classes. It also mandated annual reporting of key data such as graduation rates, placement rates, pass rates on licensure exams and default rates as well as surveys of employers and graduates. This offers both an early warning system of problems at accredited institutions and potential consumer information.

CAEP was able to accomplish this for a number of reasons. First and perhaps most important was leadership from the association president and board chair. Second was creating a broad coalition of stakeholders, including critics, to develop the new requirements. Third was vision, an understanding of the changes that were occurring in higher education and the impact they would have on accreditation. Fourth was developing a process and calendar for carrying out the changes. Fifth was need: Teacher education was being widely criticized and there was pressure for the field to update and raise standards.

The CAEP example shows that accrediting associations have the capacity to make the changes required for 21st century learning. The Federal Government has the

ability to accelerate such changes in accreditation. This would involve carrots and sticks. In terms of carrots, it would be useful to develop an RFP and funding for accrediting agencies to merge, modernize and create common standards. In terms of sticks, it would be useful to take the lessons learned through the RFP process and establish accreditation association recognition criteria for the 21st century.

The CHAIRMAN. Thank you very much, Dr. Levine.  
Dr. Wolff, welcome. And again, please proceed.

**STATEMENT OF RALPH WOLFF, J.D., FORMER PRESIDENT,  
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES, ALA-  
MEDA, CA**

Mr. WOLFF. Thank you. Good morning, Senator Harkin, Senator Alexander, members of the committee.

I appreciate the opportunity to be here.

As you indicated in the introduction, I served for 17 years as president of the Senior College Commission of WASC. I recently stepped down and am moving into independent consulting on educational policy.

My message today is simple and direct. Accreditation has served the country and the higher education system well, and has adapted repeatedly over the years. As we look to the future, however, the need is greater than ever for a quality assurance system that is more flexible and more responsive to both traditional and nontraditional students and institutions.

Accreditation is changing, but needs to change even more and more quickly to respond to what is an incredibly dynamic environment today in higher education. Regional accreditation focuses on the whole institution and encompasses all activities on and off campus and online. Federal law identifies 10 areas in which accreditors must have formal standards, and accrediting associations go beyond those to address comprehensively institutional and student performance.

It is an extensive process that involves self-study, review by peers, a written team report, and formal accrediting action by commissions comprised of diverse institutional and public members. The principle of peer-review was fundamental to this quality assurance process.

We cannot rest on our laurels. I think there are eight areas where I would like to propose change could occur.

No. 1, accrediting agencies need to more clearly define and articulate their role in addressing key issues of public accountability. We are a membership organization, but we serve the public interest and need to be more clear how we do so.

No. 2, accreditation needs to become more transparent. The process is opaque right now. You cannot see what most accreditors do. Since June 2012, the WASC Senior Commission has made all team reports and decision letters public on the WASC Web site for all to see. The sky has not fallen. Confidence in accreditation is best assured with full transparency.

No. 3, there is a need for clearer and more rigorous benchmarks for student learning. We need to be able to answer how effective is the learning achieved by today's graduates. WASC Senior's most recent revision to our standards require each institution to demonstrate graduates are proficient at or near the time of graduation

in at least five core competencies: written and oral communication, critical thinking, quantitative reasoning, and information literacy.

Institutions and accreditors alike need to articulate to students and to the public what a degree or a certificate means, not only in terms of what courses were taken, but what students know and can do.

No. 4, accreditation needs to address college retention and completion as a key element in the accrediting process. The challenge here is in the evaluation of the data. What is an appropriate completion rate for each institution? No single bright-line will work for every institution, but still, we must be able to say when an institution needs to improve its completion rates and then hold those institutions accountable for improvement.

No. 5, more needs to be done to demonstrate that all highly entrepreneurial institutions, nonprofit and for-profit, are subject to close review of recruitment practices and assure quality in all their programs.

No. 6, we need to right size the cost and expectations of the accrediting process to align more closely to the risk presented by each institution. To do this, however, the Department of Education will need to relax its requirements that each institution address and demonstrate compliance with every accrediting standard in each comprehensive review.

No. 7, as innovations increase, and they truly are, we must balance openness with the monitoring of new programs and institutions so as to be able to demonstrate their integrity and their quality. Innovation is needed, to be sure, but not all innovations will be effective. For accrediting agencies to develop new approaches, the Department's recognition process needs to become far more flexible and adaptive as well.

No. 8, many innovations fall outside the eligibility criteria of regional accreditation. MOOC's, for example, are course-based; they are not degree-centered. Sub-degree programs like Straighter Line and others operate independently from accredited institutions.

For these innovations and others, experimental or pilot approaches should be developed where there is a much more conscious, designed-built approach with frequent and transparent monitoring. And I believe such models can be created.

In conclusion, accreditation should continue to play a central role in the quality assurance system of American higher education. At the same time, to address the dynamic changes ahead, accreditation will need to become far more transparent, adaptive, and responsive.

Thank you.

[The prepared statement of Mr. Wolff follows:]

PREPARED STATEMENT OF RALPH A. WOLFF, J.D.

#### SUMMARY

As much as accreditation has withstood the test of time, changes within and outside higher education are calling for new approaches. Regional accreditation has, over time, adapted to many changes in its 100-year history, but the rapid pace of change and the scale of issues facing higher education today call for accreditors to do more. Changes are already being made to standards and processes to respond to this changing environment but accreditors will need to:

- establish itself more effectively as a voice for public accountability;



- increase transparency;
- establish clearer benchmarks for learning results;
- address completion responsibly;
- right-size the cost and effort involved in the accrediting process;
- assure the quality and integrity of highly entrepreneurial institutions (and programs), and
  - develop or collaborate with experimental or pilot programs for assuring the quality of new entities and activities that fall outside the scope of eligibility of regional accreditation.

Accreditors have done far more to encourage innovation than they get credit for, and have been leading institutions into areas that are part of this new accountability agenda, such as the assessment of learning outcomes. Already accreditors have worked to develop procedures for the approval of competency-based programs, for example, as well as credit for prior learning.

Accreditors will also need to determine how to address the new ratings system developed by the Administration, and work with institutions and the Administration to ensure that data used is accurate. Comprehensive institutional accreditation reviews will necessarily go beyond these indicators but need to ensure that integrity, quality and effectiveness are maintained, while being open to innovation. At the same time, accreditors need to balance assuring the quality of innovations so as to warrant public trust, while removing real and perceived barriers. Further regulation by the Department of Education will similarly need to be assessed to ensure it allows accreditors to make changes, and do not stymie either institutions or accreditors from being more responsive. Alternatives to regional accreditation that have been proposed are weaker than the current system in protecting students and the public, and assuring institutional quality and integrity.

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Good morning, Senator Harkin, Senator Alexander and members of the committee. Thank you for this opportunity to address the issue of accreditation as a key quality assurance process for higher education in the United States, and its ability to meet the needs of 21st Century learning.

I have worked in higher education for over 40 years, and served as president of the Senior College and University Commission of WASC, the Western Association of Schools and Colleges, for 17 years. WASC is one of the six regional accrediting associations recognized by the U.S. Department of Education and the Council of Higher Education Accreditation (CHEA). I stepped down as president August 30, 2013 and until December 31, served as a Senior Advisor, and thereafter will be serving as an independent consultant on higher education and accreditation issues. Thus, I am addressing you as one with extensive experience in accreditation and higher education, but I do not serve any longer as an official representative of any accrediting agency. My comments are directed primarily to the regional accrediting system, which collectively accredits over 3,000 institutions.

This hearing, and the discussions that will occur as part of renewal of the Higher Education Act, come at an incredibly dynamic period for higher education. At a time when higher education is seen as critical to the future of our country, there are significant criticisms of both higher education and accreditation as a system assuring the quality and effectiveness of these institutions. Some are beginning to question whether degrees will continue to be the most valuable credential or whether students need to acquire “stackable credentials” and badges that display more about what someone can do; simultaneously, we are seeing the deinstitutionalization of learning as more and more students attend multiple institutions and bring with them courses and learning activities from a variety of sources outside traditional institutional settings, such as credit for prior learning, courses from MOOCs, iTunes U, TED.com and other providers. Increasingly, technology is being used to create adaptive learning systems that augment, and will possibly replace, some or all of the instructional functions performed by faculty. And new entities are being formed that are challenging traditional notions of delivery and costing structures. While many of these changes are emergent, (re)defining and assuring quality at traditional and innovative institutions alike is the challenge we all face for the future. It is likely that the pace of change will only increase with many approaches that we cannot foresee today, just as we did not foresee the advent and growth of MOOCs even 3 years ago.

I will state at the outset that I believe that accreditation can, and should, remain a vital part of the quality assurance system for the present and future, but it is clear that accreditation, and all other parts of the higher education system, are going to need to adapt to these changes. While president of WASC I tried, with considerable success, to reframe our agency as a vibrant voice for public accountability.

I believe there are lessons to be learned from the work we have done, as well as important steps underway with other accreditors to respond to these changes. Accreditation is going to need to respond to the concerns that critics have asserted, rightly or wrongly, in a responsible way, while at the same time, respond to the many innovations occurring today and in the future. This will need to include support for experimental or pilot efforts for both traditional and new institutions and entities.

#### I. BACKGROUND AND DESCRIPTION OF ACCREDITATION

Accreditation is over 100 years old, established by schools, colleges and universities to create common standards and assure quality across institutions. It has adapted repeatedly to serve the diverse array of institutional missions within the American higher education system. In the past 50 years, and especially in the past 20, the number of specialized, online and for-profit institutions has increased significantly.

All accrediting agencies use a similar process—institutions undertake reflective self-studies framed by the accrediting agency's standards, with the goal of identifying areas of strength and needed improvement, followed by a review of the institutional report and a site visit by a team of specially trained peer reviewers, senior level experts who assess the accuracy of the institution's self-study and issue a report with commendations and recommendations. The professional judgment of these volunteer peer reviewers is the cornerstone of the accrediting process and these reviewers are matched to the type of institution being reviewed to ensure an in-depth review. These peers undertake their reviews with keen awareness of their responsibilities to serve the public interest.

Site visits provide an opportunity to verify information submitted by the institution and interact with faculty, students and staff in ways that no purely documentary review ever could. Site visits also enable teams to understand each institution's context in greater depth so that findings and recommendations for improvement are more authentic and realistic. The institution's self-study and the team report are then reviewed by an accrediting commission of institutional and public members who make an accrediting decision.

The standards developed and applied by each agency are periodically reviewed and revised through surveys and consultations with a wide range of constituencies, including but not limited to the institutions themselves, as well as students, business groups and policy leaders so that they represent not only effective minimum standards of accountability but also lead institutions to greater quality and effectiveness. In the most recent WASC review of standards, a series of papers were commissioned to identify areas of needed reform along with extensive surveys and meetings, leading to calls to place students more in the center of the accrediting process through an emphasis on completion and demonstrated learning outcomes.

In addition to these regular cycles of comprehensive review that range from every 6 to 10 years depending on the region, accrediting agencies undertake close monitoring of institutions through annual reports, required prior approval of new off-campus and distance education programs, mergers and other changes in between cycles.

Additionally, progress reports and special visits are often required when needed to assure institutional followup to key issues.

Accreditation typically means something different for institutions at different stages of maturity. For a new institution, accreditation is largely a gatekeeping function to ensure that the institution meet all standards at least at a minimum level of compliance. For well-established institutions, accreditation is more about identifying areas of needed improvement, and questions about how to avoid rote compliance for these institutions has led to different approaches by each of the regions to address this concern. Data collected by regional accrediting associations reflect that approximately 40 percent of institutions initially applying for accreditation do not achieve it, and well over 50 percent of institutions undergoing comprehensive review are required to have additional monitoring and followup to ensure continued attention and progress in addressing areas of needed improvement.

As institutional accreditors, the standards adopted by regional agencies are necessarily comprehensive in nature. Federal law and regulations require that accreditors have standards that address 10 specified areas. (Section 602.16) There are many elements to ensuring institutional and educational effectiveness and standards adopted by accrediting agencies reflect these multiple dimensions, going beyond the areas identified in law. The standards are intended to assure, individually as well as collectively, institutional integrity, sustainability and effectiveness. Standards address such areas as sufficiency of financial resources, the sufficiency

and qualifications of faculty for the range and types of programs offered, technology resources and support; the currency and quality of educational programs; student support services; decisionmaking processes; planning for the future; institutional data collection and analysis against key institutional metrics and more. Institutional integrity is also reviewed in depth through review of institutional promotional materials, recruitment and admissions practices, and financial statements. Regional accreditation is of the whole institution, and since each course and program cannot be reviewed individually in large comprehensive universities, focus is placed on quality assurance systems, and whether institutions themselves have clear goals, educational outcomes, and analyze data on their own effectiveness.

While review of institutional resources and processes are important for assuring institutional sustainability and the creation of conditions leading to quality, increasingly accreditors are calling for demonstrating institutional effectiveness in terms of demonstrated achievement of learning outcomes for each of the institution's educational programs. This is reflected as well in Federal law in section 601.16 as well and characterized as "success with respect to student achievement." Multiple studies have shown that accreditors are the primary driver of institutions identifying and assessing student learning outcomes beyond grades. This has led to a shift in focus from teaching to learning in the accrediting process, and institutions are undertaking multiple assessments of student learning through the use of rubrics, portfolios, local and nationally normed tests, and other measures.

Institutions across the country have engaged in serious efforts to identify and measure learning outcomes in general education and in each major, and have been supported by efforts of many groups, such as the American Association of Colleges and Universities (AAC&U) essential learning outcomes projects. At WASC we even created an Assessment Leadership Academy with a 9-month certificate program to prepare experts in assessment to work within their own institutions; the Higher Learning Commission runs its own assessment institute, and SACS offers a well-attended summer institute on assessment. Thus, accrediting agencies have been leading the higher education community in not only requiring assessment of student learning outcomes but also training faculty and staff toward learning centered institutions.

## II. RESPONDING TO ACCOUNTABILITY CONCERNS—ACCREDITATION AND THE PUBLIC INTEREST

Over the past several years, critics have charged that accreditation has not been a strong enough force for institutional accountability and that it has failed to protect the public interest. Accreditors, in turn, discuss institutions "turned around" as a result of accreditation actions and its ongoing monitoring, and of dramatic changes resulting from the peer-review process. In my view, there is much to support both the concerns about accreditation and our defense—but the two sides are not effectively communicating and addressing each other. Along with the increased importance of higher education, and its cost, greater attention has been placed in the policy world on what have become key markers of the higher education system's effectiveness—completion rates, learning results, and institutional truthfulness and integrity in recruitment practices and representation of future job prospects, licensure, etc. Because accreditation deals with each institution individually and in relation to its distinct mission, there is little systemwide reflection on how and to what extent the accrediting process addresses the overall effectiveness of higher education in each region, let alone nationally. As well, accreditation has historically seen itself as a member-driven organization needing the consent of its membership for the adoption of new standards and new processes.

The times have changed, and increasingly accrediting agencies have redefined their purpose to serving the public interest along with that of their membership. For example, both the Higher Learning Commission and WASC have standards calling for institutions to demonstrate that they serve the public interest. The significant investment of time devoted to the accrediting process by institutions, teams, and commission members serves the public interest, but as key indicators become more central to the policy debate, it will be important for accrediting agencies to more clearly define how they are responding to these issues or lose their relevance to these important policy debates.

It is possible for accreditation to continue to play a significant role in addressing policy concerns and still maintain its mission-centered approach to institutional evaluation—but only by becoming clear and direct in making these issues more visible and central to the accrediting process. Several such issues, and needed steps, follow.

**Embracing a clear role for accreditation to serve as a voice for public accountability.** While accreditation is a creation of the institutions themselves, and funded through dues and fees from those institutions, the accrediting community needs to publicly embrace and define more clearly its role in assuring the accountability of the institutions each agency accredits. As described below, I believe that greater transparency is central to this charge. But equally important is for each agency to define how it is responding, through its standards, processes and actions, to the call for greater accountability of higher education in such key areas as retention/graduation, learning results, supporting student needs and responsiveness to the changing environment in higher education. The following chart reflects that this is a new role for accreditation and one that can and should be articulated by each agency. In other words, while retaining their comprehensive approach to institutional quality and integrity, accrediting agencies can, and should, articulate and demonstrate publicly how they are addressing key issues of accountability in the accrediting review process.

ROLES OF ACCREDITATION			
Core Functions of Accreditation	Compliance Oriented	Improvement Oriented	Accountability/Quality Assurance Oriented
Focus of Review	All standards applied to assure compliance	Key areas selected and approved by accreditor for improvement	Specific areas identified as part of all reviews to address common policy issues—e.g., retention/graduation rates, student learning outcomes
Demonstration of Effectiveness	Must demonstrate standards are met at least at minimum level	Simplified compliance review and primary emphasis on recommended improvements	Standards of performance set by institutions, and, where appropriate, comparative indicators used
Public Reporting and Transparency	Public announcement of grant of accreditation	Reports internally circulated for improvement; accrediting action publicly reported	Meaningful and clear public information about institutional performance and commission actions reported

**Increasing Transparency.** Federal regulations require that accreditors provide basic information about an institution's status with the agency, the date of its next visit, when first accredited and that a statement of reasons be issued when an institution is placed on a sanction. For accreditation to assure confidence in its actions, there needs to be far greater transparency. There are concerns that candor would be lost, but as part of the public accountability role accreditation needs to play, more information needs to be readily available to policymakers and the public on what accreditation teams do and the actions accrediting commissions take. Nearly all public institutions already are required to make their accrediting reports publicly available. The WASC Senior College Commission took the step in June 2012 to require that all team reports and Commission decision letters be made public on our Web site. This was done after consultation and support from the institutions in the region, and has been accomplished with few problems. Institutions can choose whether to make their self-studies public but it is important for the public to see not only the final decision, but also the basis for actions that accreditors take. The Higher Learning Commission of North Central is moving in this direction as well and the Middle States Association has been providing more information about its actions. If accrediting teams are not focused on the right issues, or not doing an effective job, then the work products of the process should be available for review, comment and research. Confidence in accreditation is best established when all can see what we do.

**Establishing benchmarks for learning results.** For the past 20 years tremendous emphasis has been placed in the accrediting process on specifying and assessing learning outcomes. Studies have been conducted, however, that challenge the effectiveness of college and the learning gains of students. Employer surveys also question the preparedness of many of today's graduates for the workplace. One of the greatest values of accreditation is that it evaluates institutions in the context of each institution's mission and student body characteristics. Cal Tech and Pomona College, for example, have different missions, and student bodies, than California State University, San Bernardino or Laney Community College. A single measure

of learning would not be useful or appropriate for all institutions, yet we cannot escape the question whether the learning of graduates in key areas meet appropriate standards or benchmarks. Accreditors, working with institutions, must be able to demonstrate that graduates are proficient in key areas that are foundational for their future. Assessment needs to move beyond process to an evaluation of results. This too needs to be part of a new public accountability agenda that accreditors are moving toward and need to embrace. Is the level of learning of the institution's graduates "good enough"? In the most recent revisions to the WASC (Senior) accrediting standards, we required each institution to demonstrate that core competencies in five key areas be established for all graduates—in written and oral communication, critical thinking, quantitative reasoning and information literacy, as well as in other areas defined by the institution as important to their mission, as well as in the discipline in which the degree is awarded. Such a requirement was contested and deeply debated throughout the region, and finally adopted by the WASC Commission with the understanding that each institution needed to define, and establish evidence for its proficiency standards for graduates, and that there could be variation within the institution as well depending on the student's major field of study. Already, institutions are hard at work defining and developing tools for assessing performance beyond the assessment efforts already underway. It will be important to recognize that no single test or instrument can fully measure the complexity of learning, and the application of skills needed for 21st Century learning. Multiple indicators are needed. Teams will also need to be trained how to determine and evaluate what are appropriate levels of learning for institutions, and with reports now being made public, these efforts will be transparent.

In addition, several accrediting agencies have piloted the application of the Degree Qualifications Profile, developed by a team supported by the Lumina Foundation, as an optional framework for evaluating degree requirements and the outcomes of learning. SACS, for example, has used the DQP for a project with HBCU's; WASC (Senior) piloted it with 28 institutions, several of which used the framework to revise their degree program.

It is understood that the visibility and impact of these efforts need to be better communicated—both by institutions displaying learning results with appropriate context, and accrediting agencies as central elements in the accrediting process, with the agency's evaluation of learning results made public, to address growing concerns about quality across the higher education system.

**Addressing completion responsibly.** One of the thorniest issues is the role of accreditation in improving retention and graduation responsibly given the diversity of institutions, differing student characteristics, and difficulty of getting complete and accurate data on the mobility of students. Institutions need to take greater responsibility for collecting and analyzing retention and graduation data, disaggregated by different characteristics, and establish meaningful benchmarks for defining an effective level of completion. As part of the public accountability agenda for regional accreditation, more needs to be done to make an evaluation of retention and graduation data central to the accrediting process. This issue was a key element in the redesign of WASC (Senior) accreditation, and a review of disaggregated institutional data has become a major focus of the accrediting review process. The Higher Learning Commission, the Middle States Association and the New England Association have also made such reviews more central to their processes. The challenge is in the evaluation of the data—what is an appropriate completion rate for this particular institution? How can the institution increase completion while also improving learning results? No single number or metric works for each and every institution, yet there are clearly institutions with rates of completion that are comparatively low and those with significant completion rates, especially for underrepresented groups. Accreditation is beginning to call this out and monitor efforts to address and improve retention. Such efforts will take time and commitment on the part of institutions and accreditors as well as sensitivity to the fact that improving retention is not always easily addressed, and it takes time to determine if such efforts are successful.

As the administration develops its new rating systems, accreditors will need to consider the data elements reflected in this new system and determine how to incorporate the data into their processes. Of course, the accuracy of data will be critical, and it will be important as well to probe in depth the data in relation to each institution's mission and context.

Improving retention must be coupled with efforts to monitor and improve learning so that the two efforts are intertwined. Completion without effective learning creates a hollow statistic, while efforts to improve learning standards must take into account the impact on student retention.

***Assuring the quality and integrity of highly entrepreneurial institutions (and programs).*** This committee has raised serious questions about the effectiveness of accreditors in reviewing the practices of publicly traded for-profit institutions. While not all publicly traded institutions were found to engage in questionable practices, the hearings clearly revealed that more needed to be done by both accreditors and the Department of Education to discover and address such practices. Since these hearings, considerable effort has been undertaken to tighten reviews of entrepreneurial institutions, for-profit and nonprofit alike, through more detailed reviews and additional monitoring activities. Efforts to acquire accreditation through the acquisition of struggling institutions has become more closely monitored and infrequent, and efforts to incubate innovative new programs or institutions through affiliation agreements with accredited institutions creates a Catch-22: the new program or institution seeking to develop into an independent and separately accredited entity runs afoul of the accreditation requirement that the accredited institution must take full responsibility for all academic components offered in its name. Ironically, heightened oversight to assure quality and integrity of these arrangements is now associated with being a barrier to innovation. A middle ground must be found and some suggestions are below.

***Rightsizing the cost and expectations of the accrediting process.*** Engaging in self-study and institutional review takes on different characteristics for a new institution seeking initial accreditation than a well-established institution that has been reviewed multiple times with no major issues or problems. If one were to view the accrediting process as a periodic academic and institutional audit comparable to (but even more comprehensive) than a financial audit, the costs of accreditation would seem quite reasonable. Furthermore, to the extent that institutions are able to use the self-study and team review process to make needed changes, as all accreditors encourage, the costs of the process are typically of internal value as well. Nonetheless, a number of institutions have called into question whether the accrediting process needs to be the same, and as labor intensive, for all institutions, especially those which have always had highly successful or positive reviews. Each regional accreditor has attempted ways to make the process relevant to the institution being reviewed, and the New Pathways process of the Higher Learning Commission is one approach. Both SACS and WASC (Senior) use a combination of offsite and onsite reviews to do as much as possible offsite through review of documents and institutional data, and to focus the onsite review to institutional improvement.

One of the barriers to radical change comes from interpretations by the Department of Education staff that all institutions must undertake a comprehensive self-study against every accreditation standard, and all evaluation teams must evaluate each institution against every one of these standards. While technology permits electronic transmissions of material, radical changes to the process needs to be explored, including reviews of publicly available information and waivers of certain standards to allow for more limited and focused self studies (or redefining these reports altogether) and using new approaches to institutional evaluation. Such efforts would need to be through collaborative efforts of accreditors, institutions and the Department of Education and should be undertaken so that the process can be more effectively tailored to each institution's history and context.

#### IV. RESPONDING TO INNOVATION AND THE CHANGING LANDSCAPE OF HIGHER EDUCATION

Over the past decade concerns over accountability took primacy when addressing the role of accreditation. In the past 2 years, however, the dramatic innovations in higher education have led to questioning whether accreditation can adapt quickly enough to these changes or has become a barrier to change. We are seeing hundreds of MOOC courses offered for free by Coursera, Udacity and edX, significantly lower cost courses offered with and without faculty support by Straighterline, free universities such as University of the People, lower cost programs being piloted without financial aid by Patten University/UNow, competency-based programs that do not rely directly on credit-hour designations such as those developed by Southern New Hampshire University and University of Wisconsin (and others), adaptive learning software tied to courses such as those developed by the Online Learning Initiative (OLI), badges developed by the Mozilla Foundation and being used by Purdue and UC, Davis, innovative programs such as that developed by Minerva and more. More and more attention is being placed on employer needs, identifiable ways for employers to know what today's graduates know and can do, developing a wider range of certificates to acknowledge completion of competencies, packetization of learning material such as that developed by Salman Khan, creation of "stackable" credentials, and on and on. Even more change is likely to come, at an ever-increasing pace,

in the future. As well, as more and more digital natives enter college, many will be bringing with them new digital skills and expectations, as well as a set of learning activities for which they will seek recognition in the form of credit and advanced placement.

What is clear is that tremendous change is occurring, and whether or not every innovation will succeed is less significant than how to determine which innovations are of sufficient quality to deserve recognition in the form of credit award or financial aid. Here is where accreditation may be able to play a role but structural issues may be a limiting factor for some innovations. Currently, all regional accrediting agencies accredit only institutions that award degrees. Thus, institutions offering courses and subdegree programs are ineligible for regional accreditation.

Regional accreditation has been far more open to innovation than its critics give it credit for. For example, online universities have been accredited for some time; so too have many institutions with highly distinctive missions or delivery processes. In response to the development of competency-based programs moving off the credit-hour system, New England, Southern, the Higher Learning Commission and WASC have all developed criteria for the review of such programs and approved. These review processes are designed to protect students and assure quality.

Some critics have expressed concerns that the accrediting process takes too long for startup institutions, and the lack of accreditation, or access to financial aid, stymies their development and recognition of their activities. It is true that for new totally new institutions, the process typically takes a minimum of 4 to 6 years to move through the multiple stages to initial accreditation. Partly, that is due to Federal regulations that require at least one class to have graduated before institutions can be accredited. But the time to become accredited is an insurance policy that the institution has the stability and quality to sustain its operations and warrants recognition by peer institutions as well as the public.

The Department of Education has recently put forth a proposal to develop the experimental site concept to promote innovation. There may be value in considering whether to develop an experimental accrediting process for innovative programs and activities that are currently ineligible for regional accreditation, as a complement to the regional system. Rather than accrediting individual courses, such a process could carry over the principle of institutional accreditation for all courses or programs offered by the entity, based on quality principles newly developed for such activities, emphasizing outcomes and results, and using a “design-build” model of approval and ongoing monitoring.

What is clear is that trying to develop more regulations to encompass current and yet-to-be developed innovations will only stymie new creative ideas and projects. I serve on a quality assurance board assessing educational institutions operating in the free zones of Dubai, where a review system is in place as an alternative to the national system of accreditation. Here in the United States, we may want to experiment with “innovation zones” in which new models and approaches could be piloted and reviewed by a newly developed process designed through collaboration between the Department, institutions, employers, students, and accreditors.

#### V. EVALUATING ALTERNATIVES TO ACCREDITATION

There are those who suggest that accreditation has outlived its usefulness and should be replaced by other systems of quality assurance. I am not convinced that alternatives that have been proposed would be more effective; in fact, I see the alternatives that have been suggested as far weaker than the current system in protecting students and the public, and assuring institutional quality and integrity. Alternatives that have been proposed include:

- **A public disclosure approach.** There are those who suggest that disclosure of key institutional characteristics would provide sufficient information for consumer choice regarding quality and integrity. For some, this would have the Federal Government going beyond its current threshold reviews of institutional finances and defining indicators of minimum performance in other areas. It is not clear from such proposals who would assure the accuracy and truthfulness of institutional statements. A free-market approach would create even greater opportunity for mischief and misstatements. As mentioned above, the new administration ratings system will provide disclosure of information in relation to several key areas, but not reflect the comprehensive dimensions that accreditors review at each institution.

- **Greater assertion of Federal oversight.** Others have suggested that greater Federal intervention should be exercised in place of accreditation or assuming some of the threshold compliance role of accreditation. Already, there are more than 100 regulations in place for the recognition of accrediting agencies, and many additional sub-regulatory interpretations going beyond this regulatory language. More regula-

tions do not necessarily lead to greater quality or productivity, but often increase the administrative burden of the accrediting process. Given the inability of regulations to be applied contextually or adaptively, this approach would undoubtedly limit institutional reviews to minimum compliance with Departmentally defined metrics, but there would be no impetus for promoting institutional excellence or improvement, or innovation.

- ***Creating separate processes or accrediting agencies for different categories of institutions.*** There are those who suggest that accreditation should be segmented by institutional type. Apart from the problem of defining what would be the types or categories of institutions that would qualify for segmental accreditation, this approach would need to define differential standards for each category. Such an approach could well create a *de facto* ranking system for higher education, causing those institutions that serve underrepresented populations to be seen as “lesser than” elite institutions. Today’s graduates need to be able to compete an open marketplace and one of the greatest virtues of regional accreditation is that it puts all different types of institutions under a common review process.

#### VI. RECOMMENDATIONS AND CONCLUSION

I have presented a number of recommendations throughout this testimony. There is still a significant role for accreditation to play in the quality assurance system for American higher education. As much as accreditation has withstood the test of time, changes are being made to standards and processes to respond to the changing character of traditional and nontraditional institutions alike. But, as I have stated earlier, more needs to be done to position accreditation to become a more robust and visible voice for public accountability in key areas, and to assure that it is responsibly and expeditiously addressing educational innovation.

As we move into a future where change will even be more rapid and dynamic, experimentation and new approaches should be developed as complementary to existing accreditation processes. If successful, these experimental approaches thereafter could be integrated into existing accreditation structures or developed into sustainable enterprises in their own right. To do so, however, there will be need for the recognition process of the Department of Education to become more open and flexible to allow for new and more adaptive evaluation approaches that could be implemented by crediting agencies for traditional and new institutions alike.

With the dialog continuing over the coming months as to how best to respond to the many changes and issues affecting higher education, we all need to remain open to new ideas and approaches, and be willing to collaborate for a better future for today’s and tomorrow’s students.

The CHAIRMAN. Thank you, Dr. Wolff.

Now, we will turn to Dr. Phelan. Welcome, Dr. Phelan, please proceed.

#### STATEMENT OF DANIEL J. PHELAN, Ph.D., PRESIDENT, JACKSON COLLEGE, JACKSON, MI

Mr. PHELAN. Good morning, Chairman Harkin, Ranking Member Alexander, and members of the committee.

I am pleased to be here to share some insights. I come to you not only as a community college president, but also as a boots-on-the-ground person that actually serves as a consultant evaluator for the Higher Learning Commission, the largest of the regional accrediting bodies. So I bring that perspective with me today.

I concur with my colleagues that American higher education is highly successful overall and I believe that regional accreditation is, in part, responsible for that success. What sometimes is lost in the conversation is that accreditation is really a process of meeting the organizational, program, and service standards, and that those are developed by consumers; they are developed by stakeholders. They are developed by internal and impartial individuals as well, professionals, regional and national organizations giving us insight into what that should be.



Accreditation's first part indicates that there is an accredited organization that has achieved an appropriate level of organizational proficiency. That there are mechanisms in place for ensuring that there is continuous quality improvement in the work and that we are delivering service and mission, as so stated by our organization. Accreditation also acknowledges a level of organizational competence for which we are responsible. It is comparable to what other institutions are doing. It allows us to have a basis of understanding for one another. And equally important in my view, particulars present, that it identifies areas of need, areas where we need improvement. That is important.

At my institution, for example, I appreciate getting the responses from the consultant evaluators and the team reports later that talk to me about areas where I need to improve, such as assessment or that I need to improve my metrics for accountability of students. I may not always like what they say to me, but I appreciate that there is an external third party who has provided this evidence for me that I can use within my organization to help prompt change, and that is helpful.

Accreditation also means that as a college, we have numerous management controls in place that are related to accountability and efficient use of our resources. Think of it as being very similar, in lots of ways, as to an audit in your organization. You bring in external people who come in. They are adjunct from your organization providing insight about: are you living up to your mission? Are you living to the value proposition that you espouse?

I also think that accreditation does a lot of good work that is not being recognized. Regulation can, and should, focus on ensuring baseline requirements and minimums, and accreditation can, and does, push institutions beyond themselves and pushing them toward excellence. That is what I need. That is helping drive change with my board of trustees and with our faculty and staff. It is that excellence, not minimums, that we need.

For me, the Higher Learning Commission has provided those options. For example, our institution participates in an alternative approach to accreditation, built around the Baldrige Quality Awards. It is a 7-year cycle called the Academic Quality Improvement Project. It is allowing us to follow specific standards of achievement, and we report that every year to the accrediting body and then we have a team of visitors in 7 years.

I would also let you know that the peer-review process is incredibly important and I take the entire process—not only as a peer reviewer but as a president—I can tell you that our colleges, our boards take this entire process extremely carefully, and we understand it, and we embrace it as an important part of the process. It sets the gold standard by which we announce to the public, to our employees, and to our students that the work we do here is good. It is acceptable by other receiving institutions of our college credit.

I will tell you that, overall, I see for Jackson College, an extreme benefit to the peer-review process. It allows me to have a common language, a way to share and describe, and work together with my peer institutions, whether they be other community colleges or baccalaureate granting institutions.

Clearly, higher education is changing at a rate and a pace that we have never seen before. In many ways, this change is disruptive and it is affecting us, and we have seen more of it than we have in the last 50 years.

But because so much is changing rapidly in higher education, we do not want to hamper productive innovation. So from my perspective, Congress should seek to guide accreditation toward quality, but insist on flexibility, doing so, so that the regulations that derive from law do not freeze accreditors, and thus institutions, into modalities that, in 5 years, we may find dated, or irrelevant, or outmoded.

I believe that much of the ongoing criticism of higher education today is not by the system, but because of the pace of change in higher education; in some cases, the change in demographics of the students that we serve. Lots of it are being affected by the economy, which is demanding that more and more Americans access and succeed in higher education.

That said, accreditation alone does not bear the responsibility entirely here for the shortcomings of the system. It is not designed to do that. Institutional officials, trustees, legislators, Government officials, even the public, all play a significant role in this process. We are all responsible. The ones who count most are the students; they vote with their feet.

Accreditation does allow for substantial modifications within the academic structures of which we are all familiar. Many factors influence the different course and programs that we offer. In truth, State Government, sometimes the politics within our institution are the barriers themselves and obstacles to change within our organization; not so much accreditation in, and of, itself.

It is difficult for me to contemplate what would replace accreditation. So I agree with my colleague, Dr. Levine. I think some improvements would be beneficial, but I do not think we throw the system out. I think accredited institutions can generally add new forms of learning if they find it consistent with their mission and standards.

I also want to call the important attention to transfer, successful transfer of credit remains an incredibly deficient area of higher education systems. I think accreditors cannot be the primary focus of solving this problem, but we do believe that the issue needs to be raised in all quarters, and we further believe that the Federal Government needs to force the States to take a more active role in doing that. We are all accredited institutions; we should have that worked out.

In my view, excellence is always within the framework of a particular institution's mission and the tolerance for variety and mission is crucial to our Nation's ability to develop its highly diverse population. So that each person has the opportunity to be the best that he or she can be.

The ability to tolerate variety of mission while still bringing in critical judgment to bear on the mission and fulfillment of that mission is what accreditation can, and does, do. Congress should seek to strengthen accreditation, not substitute regulations or focus on a small number of quantifiable indicators. It is important to look at graduation or completion rates, for example. But what ac-

creditation adds to that is the ability to look, and show, and demonstrate how and what we are to students, and what they learn, and what they need to learn in order to graduate.

I thank you for providing me this opportunity to appear before you this morning, and look forward to questions that you might have.

[The prepared statement of Mr. Phelan follows:]

PREPARED STATEMENT OF DANIEL PHELAN, PH.D.

SUMMARY

**Accreditation's Peer Review Process is Partially Responsible for the Success of American Higher Education**

- American higher education is a huge success by any objective metric and accreditation has played a significant role in higher education's success.

**Changing Higher Education Means a Changed Context for Accreditation Policy**

- It is appropriate for policymakers to expect accreditation to evolve along with higher education and other external forces.
- The higher education system has changed dramatically over recent decades and the desired outcomes expected from the system should be viewed in that light.

**Accreditation Does Accommodate Institutional Change and Improvement**

- Accreditation has allowed higher education to develop and in reality other forces are more responsible for delays in new program offerings.

**New Accreditation Vehicles, New Program Structures, and Their Relation to the Title IV Programs**

- The Federal Government should allow new types of programs to receive title IV funding on a pilot or demonstration basis, but wholesale changes to accreditation as title IV "gatekeeper" are unwise at this time. Past instances of program abuse lend credence to this view.

- It is unclear what accreditation might be replaced with—a set of quantitative metrics as some have proposed is unsound policy.

**Accreditation and Transfer of Credit**

- The lack of acceptance of credit between institutions of higher learning remains a significant drag on the system. Accreditation should help with this process, and the Federal Government should leverage State action.

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Good morning, Chairman Harkin, Ranking Member Alexander and members of the committee. My name is Dr. Dan Phelan and I am president of Jackson College in Jackson, MI. Located about 80 miles west of Detroit, Jackson College educates more than 8,000 credit and 2,000 non-credit students annually in a tri-county service area. Jackson College is institutionally accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools, the largest of the six regional accrediting bodies. I have worked closely with the Higher Learning Commission over the years, serving as a Consultant-Evaluator for the Commission, with prior tenures on its Institutional Actions Committee and a number of other ad hoc committees. Jackson College participates in the Commission's alternative accreditation program, known as AQIP or the Academic Quality Improvement Project. AQIP is based upon the Malcom Baldrige National Quality Award criteria, which uses a 7-year review cycle coupled with annual reporting. Jackson College also has a number of supplemental program accreditations, primarily in the career areas.

I am pleased to be here today to present my own views as well as those of the American Association of Community Colleges (AACC). AACC represents the Nation's more than 1,100 community, junior and technical colleges.

Without question, higher education is undergoing remarkable and rapid change. This change is born of new developments in technology, changes in funding, global competition, and rising expectations for accountability from parents, students, employers, and government agencies. Accreditation is no exception to this changed reality. Expressions of concern about quality in higher education, confusion over the accreditation process itself, anxiety about student outcomes, and calls for increased transparency have all led to suggestions that accreditation is broken. Yet we believe

these critics are wrong. Permit me a few moments to discuss accreditation, its current context, and where it may be headed.

ACCREDITATION'S PEER REVIEW PROCESS IS PARTIALLY RESPONSIBLE FOR THE SUCCESS OF AMERICAN HIGHER EDUCATION

America's colleges and universities, including its vibrant community college sector, are among the Nation's greatest assets, reflected in a broad range of metrics. College attendance correlates strongly with higher income, better health, greater political participation, marital stability, community engagement, and many other positive outcomes. A college education is valued highly by all major segments of the American public, and college graduates show strong support for their alma maters. Higher education remains a huge net exporter, with international students flocking to America's colleges in record numbers after significant post-9/11 declines.

This great success is due in part to the system of voluntary accreditation, which predates the Higher Education Act by more than a hundred years. Accreditation has enabled institutions to gauge how they are performing institutionally and relative to their peers, helping them to benefit from their experience, knowledge, and objectivity, which they then offer, in turn, to other institutions through the peer-review process. It serves as the "gold standard" by which institutions are evaluated, giving assurances to parents and students themselves regarding quality, governance, instruction, fiscal soundness, student success, and the like. It gives assurance to peer institutions that credit hours earned merit acceptance at transfer institutions, and it permits students to receive Federal financial aid.

Campus officials, faculty, and others in the campus community take accreditation extremely seriously and are deeply invested in the process, a reality that seems to have gotten lost in the current policy debates. It should be remembered that the resources that colleges devote to accreditation were also committed in years where there was no "gate" to the title IV programs that accreditors watched. I personally view this use of staff and financial resources as a sound investment keeping Jackson College focused on the value-added nature of our work, and its continuous improvement.

I firmly believe that, at minimum, regional accreditation generally ensures that certain quality standards are met. While relatively few institutions lose accreditation, attaining accreditation initially is a significant achievement that takes substantial effort, resources, and time, and institutions often struggle to retain their accreditation when they are reviewed.

Nevertheless, accreditation alone cannot be expected to cure whatever might be said to ail higher education, and it neither can nor should foster all the institutional change that our world demands—in a word, accreditation cannot simply be equated with institutions. Educational policy and related decisions are better made by presidents/chancellors and local boards of trustees, after obtaining input from local advisory groups, faculty experts, employers, and research. The market will then determine the relevancy of these institutions in meeting local and regional demands. For their part, State and local governments must provide funding sufficient to maintain sufficient quality standards and programmatic depth.

CHANGING HIGHER EDUCATION MEANS A CHANGED CONTEXT FOR ACCREDITATION POLICY

More students are going to college than ever before, and more students of different ethnic, experiential, economic, and cultural backgrounds are enrolling. The extraordinary increase in access to college, facilitated in large part by the title IV programs, has created this starkly different student body. Currently, only 27 percent of all college students are of the traditional 18–22 age, and the percentages of low-income and minority students attending college has increased substantially. At community colleges, about 60 percent of all students are part-time.

Consequently, when evaluating the overall effectiveness of the higher education system and the specific role that accreditation plays in it, policymakers should remember that, over the last 40-plus years, the scope of higher education has expanded dramatically, particularly in the case of community colleges and for-profit institutions. Without, in any way, absolving colleges of their obligation to serve all students well, these changes in the student body mean that expectations for the system need to be rethought. For example, graduation rates that were attained during times of relatively limited student access for well-prepared, largely affluent students will inevitably be different from those when there is much expanded college access.

American higher education remains highly competitive and decentralized. The competition for students, with their differing aspirations, has sharpened the quality of colleges and their programs. While we do not support the Obama administration's

efforts to create a Federal ratings system for colleges, the motivation driving this effort is on target, in trying to ensure that prospective students receive the information they need to select the college or program that suits them best. Regrettably, the job is far from complete. We hope that the Administration and Congress will collectively ensure that reasonable, meaningful, and user-friendly consumer information about community colleges and other institutions of higher learning is provided. We do not need more information or reporting, to the contrary, we just need better information and better coordinated information. Such an outcome would also help eliminate scores of Federal and State reporting requirements that are burdensome to colleges, especially those with limited resources. We also think that institutions and others should ensure that students receive adequate counseling in order to make the best use of the data that are available. A Federal role in this area may be desirable.

There has been much discussion of the disclosure of accreditation reviews. Because the Federal Government relies upon accreditation for quality assessment, it is appropriate to seek maximum disclosure. Most public colleges disclose all materials related to accreditation findings as a matter of course. But we also need to retain a certain amount of room for institutions to engage in tough self-scrutiny, and be assessed equally rigorously by accreditors, without requiring the type of disclosure that would undermine this.

#### ACCREDITATION DOES ACCOMMODATE INSTITUTIONAL CHANGE AND IMPROVEMENT

Many negative critiques of higher education and community colleges focus on an alleged unresponsiveness to change. Accreditation is often cited as one of the factors in inhibiting change. Generally speaking, I do not believe that this is an accurate depiction.

At Jackson College, like hundreds of community colleges across the country, we are constantly adding, modifying, and discontinuing programs, while offering some in different delivery modes and in different time sequences for students. For example, we are creating new programs to meet the needs of business, as well as those needed by students in preparation to transfer. Dramatic revisions of remedial education are well underway. In Michigan, we are now adding 4-year programs on our campuses. At Jackson College we have implemented balanced scorecards to better understand effectiveness, and each month, we provide detailed reporting to our Board of Trustees regarding critical outcomes of the College's work on Board priorities.

Speaking for my campus and community colleges generally, accreditation has not unduly delayed program changes or improvements. It is important that regional accreditors be intentional, thoughtful, and consider the full implication of new requests and new approaches to instruction, rather than simply rush to approve them and then deal with developing problems later. In truth, there are other delays of greater concern in the change process for instructional programs. In most cases, State approval procedures are more of an obstacle.

The reality is that it is in our college's best interest to offer new programs, provide new instructional methodologies, and incorporate newer technology so as to remain competitive and provide for the current and emerging needs of our student and employers. Many traditional institutions of higher education have demonstrated a clear interest in trying to incorporate newer types of programs into their credit structures. A good example of the ability of accreditation to accommodate change lies in the area of distance education. Twenty years ago, online education barely existed. In a study from 2006-7, the U.S. Department of Education found that 97 percent of community college campuses already offered online education. Other examples include the incorporation of Competency-Based Education as yet another means to provide a more detailed and credentialed announcement of student outcomes.

Despite its critics, accreditation *has* changed its processes. This is perhaps most dramatically illustrated in the area of learning outcomes. All of the regional accrediting agencies now require institutions to have defined learning outcomes, and this has had a significant impact on campuses. Learning outcomes have not replaced the traditional grading system, nor should they, but they are enabling administrators to determine, better identify and compare common outputs of courses with disparate subject material. In some instances learning outcomes have been implemented at the behest of the Federal Government, which is a good example of a desirable balance between a stated Federal priority and the actions of private accrediting agencies.

NEW ACCREDITATION VEHICLES, NEW PROGRAM STRUCTURES, AND THEIR RELATION  
TO THE TITLE IV PROGRAMS

The perceived shortcomings of institutional accreditation, as currently constituted, have led to a variety of proposals to replace or augment the present structure with dramatically new forms of accreditation, or, more specifically, Federal gatekeeping. We believe that radically different models of institutional accreditation for the purposes of title IV institutional eligibility carry with them high risk, and that Congress should proceed very cautiously in this area. Any new approaches will almost certainly be comprised of quantitative frameworks that raise the question of whether such metrics could ever capture an institution's multi-faceted mission. This is particularly the case with community colleges, with their variegated education and training programs and community responsibilities. Setting that aside, though, the ability of the Federal Government to generate a system that could be equitably applied to the diverse set of 7,000 institutions participating in the title IV programs is highly doubtful. Community colleges are particularly wary of the impact that standards of this sort—as well as those that might be applied to the title IV programs directly via statutory standards—could have on broad access, which remains at the heart of our mission.

We hasten to add that community colleges do not oppose using quantitative metrics in evaluating institutional performance. Indeed, AACC and its members have launched a Voluntary Framework of Accountability (VFA) that relies upon a series of refined metrics to assess institutional performance, including workforce outcomes. AACC believes that a national postsecondary education unit record data system is necessary and that this system should be coordinated with Social Security Administration wage data. But the provision of this data is quite different from driving all of higher education, via accreditation, to meeting national numerical goals. Colleges will respond to the incentives they are given, and a set of Federal targets administered through an accreditation system could have a distorting effect on the community college mission. Please understand that most community college CEOs do not think that performance-based funding is inherently a flawed concept; in fact, many of our campus leaders are entirely comfortable with State policies of this nature. But those *State* approaches provided for a particular *public sector*—not a one-size-fits-all Federal framework.

At the same time, the emerging new forms of delivering education and education design need to be accommodated in the title IV programs. During reauthorization, Congress should look to establish pilot, demonstration, or similar programs to assess the impact of providing Federal support to programs that are not currently eligible for title IV aid. (This policy should also be applied to programs at currently participating institutions.) For example, a pilot could be created that would allow MOOCs or “badge” programs to be funded through title IV or some similar source. Such programs could be administered by the U.S. Department of Education, perhaps subcontracting with other entities. Of course, the cost to students of enrolling in these far less expensive programs will be reflected in student funding levels, and quality assessment will remain an issue. It also should be remembered that many of the evolving forms of education are individual courses or program “bits,” and that in the process of taking courses in this fashion students may not actually be enrolled at a traditional institution, creating delivery issues.

Institutions also need to be given greater opportunities to ensure that prior learning assessment and competency-based learning, which date back to the middle of the last century, can be funded through title IV. The U.S. Department of Education is making important progress in this area.

In funding new types of learning Congress needs to be ever-watchful of the long-term implications of the student support that it provides. The example of for-profit colleges is instructive. These colleges are inconceivable without title IV funding, commonly brushing up against the ceiling imposed by the 90/10 rule. Many parties believe that much more rigorous oversight is necessary; few would maintain that for-profit colleges are under-regulated. Yet advocates of replacing accreditation with some other type of title IV “gate” generally assert that more of a *laissez-faire* market for higher education, taking accreditation out of the triad, would improve the overall quality of the system, presumably by disadvantaging current title IV-eligible institutions. However, allowing for-profit colleges to act under even *less* regulation is one outcome of this approach as is the potential emergence of “fly by night” providers associated with the early years of for-profit participation in title IV.

Generally speaking, then, the next HEA reauthorization might most profitably function as one of transition, in which the Federal Government allows many new program structures to be eligible for Federal support that might ultimately lead to a modified triad, without radically changing accreditation's gatekeeping role.

## ACCREDITATION AND TRANSFER OF CREDIT

Community college students continue to suffer from the inappropriate, unnecessary denial of transfer credits to baccalaureate-granting institutions. This is costly, frustrating, unnecessary disillusioning for students, and a huge drain on the effectiveness of the higher education system. Research shows that student success is significantly enhanced when community college students can transfer all their credits. Credit rejection often occurs even between institutions accredited by the same agency, sometimes even among two colleges within the same university system.

Still, I believe that institutions must retain the prerogative to deny credit—otherwise they lose the ability to vouch for the quality and nature of the degrees they confer—but also believe that policymakers need to address the transfer of credit issue more forcefully than they have to date. The current situation is intolerable, despite the progress that has been made in some States and the extensive level of programmatic articulation that occurs between institutions. Because accreditation is an essential part of signaling academic quality between institutions, it needs to be part of the solution. In addition, AACC continues to support a more aggressive Federal role in encouraging States to act more positively in this area.

## FEDERAL REGULATION OF ACCREDITORS

In the HEA reauthorization, we urge Congress to help reduce some of the enormous bureaucratic requirements that have been placed on accreditors. Because of its critical role as part of the higher education “triad,” there is a strong need for the government to ensure that accreditation is helping maintain a minimum level of academic quality and institutional stability. But this need has been implemented in such a way as to make accreditors more focused on simple compliance than they should be. Currently, the accreditation statute is 10 pages long, and there are 28 pages of regulations and 83 pages of sub-regulatory guidance. This level of micro-management of the accreditation process serves neither the government nor institutions and their students well.

Thank you for giving me the opportunity to speak with you this morning. I would be pleased to respond to any questions that you might have.

The CHAIRMAN. Thank you very much, Dr. Phelan. Appreciate that.

And now, Ms. King. Please proceed.

**STATEMENT OF LAURA RASAR KING, MPH, MCHES, EXECUTIVE DIRECTOR, COUNCIL ON EDUCATION FOR PUBLIC HEALTH, SILVER SPRING, MD**

Ms. KING. Good morning, Mr. Chairman, Mr. Ranking Member, and members of the committee.

Thank you for the opportunity to talk to you today about the role of specialized and professional accreditation in assuring quality in higher education.

I am the executive director of the Council on Education for Public Health, which is a private, nonprofit accrediting agency recognized by the Secretary of Education to accredit schools and programs in public health. I am also a board member of the Association of Specialized and Professional Accreditors, which represents approximately 60 accreditors who set national standards for over 80 different disciplines and professions. Over half are health professions like medicine, nursing, physical therapy and many others like engineering, architecture, urban planning, focused directly on the safety and protection of the American public.

Specialized accreditors ensure that students receive a quality education consistent with standards to entry into a profession, and are critical to delivering quality assurance to the customers, clients, and taxpayers those students will eventually serve.

In specialized and professional programs, I believe that accreditors do an exceptional job of quality assurance requiring a

rigorous process of self-evaluation against standards adopted by the professions themselves, all of which include measures of student learning.

There is an intricate relationship between the academic and practice communities within each profession. Practitioners are involved in every step of the accreditation process including development of standards and student learning outcomes, and participation as members of onsite evaluation teams and accrediting bodies. This expert input and review is critical to assuring relative training and best practices in today's job market.

Accreditors monitor each program regularly and substantively throughout a period of accreditation. Examples include annual monitoring of key student outcomes, periodic substantive change notifications, interim reporting on compliance issues when they arise, and addressing complaints from students and others.

Specialized accreditation is high stakes for accreditors, students, and the public due to the nature of professional practice. An improperly trained graduate could hurt someone. My colleagues and I take quality assurance, for this reason, very seriously.

Correction, evaluation, adjustment, and re-evaluation inherent in the accreditation process take time, but it is time well spent. It improves the student experience and, ultimately, student learning. It is also a mechanism by which professional practice standards in every field continue to evolve and improve. It is one of the reasons that the United States has some of the most well-respected leaders in the world in nearly every profession. As with any system, there is always room for improvement, and I offer the following for your consideration.

Information provided to students and the public should be useful, current, and presented in a manner that is understandable and easily accessible. Often, information on college Web sites is not clear about the differentiation between institutional and programmatic accreditation, and the related impacts on the ability of students to become certified to practice.

The general public does not understand the difference between types of accreditation and what it may mean to their future career options; and we should not expect them to. This is a complicated system the way it is now. It is our responsibility as higher education institutions and accreditors to decipher this for them.

All accreditor Web sites are accurate and current. However, external Web sites and databases, even from reputable organizations and from Government agencies, add to the confusion. We recommend that any governmental Web sites simply provide links directly to accreditors' Web sites so that consumers can access the most recent and accurate information about accreditation. And more importantly, an explanation about what it means for them in their particular profession.

Programmatic accreditation should explain how it supports institutions and programs that wish to explore new and different ways to provide education. All new initiatives are verified for quality outcomes to assure that graduates are prepared to enter the field of practice with a level of competence necessary to protect the public interest.



In the absence of such evidence, innovations chosen primarily based on cost or other criteria not related to student outcomes risk long-term negative consequences to students and the public.

Finally, there should be better communication between and among institutional and specialized accreditors who work within the same institutions. Currently, there is no organized mechanism to support information sharing and it is often difficult to access some information due to confidentiality, policies, and concerns. Regular sharing of information would allow accreditors to address problems within an institution consistently and quickly.

I appreciate the opportunity to speak to you today about specialized and professional accreditation, and I look forward to assisting you, and your staff, as you work toward reauthorization. And I would be pleased to answer any questions that you may have.

[The prepared statement of Ms. King follows:]

PREPARED STATEMENT OF LAURA RASAR KING, MPH, MCHES

SUMMARY

Programmatic (specialized and professional) accreditation has protected the public interest for over 100 years in professions ranging from medicine to engineering. Accredited programs ensure students receive a high quality education and can demonstrate competence that is fundamental to entry-level practice in a field or discipline.

Programs seeking accreditation undertake a rigorous review process including self-evaluation against standards adopted by the profession, a comprehensive, onsite review and an ongoing process of continual improvement. An accreditation review examines: curriculum; teaching; application of new knowledge; ethics/integrity; evaluation and assessment of outcomes, including student learning; faculty qualifications; student support services, including academic and career guidance; information and learning resources; laboratory and training facilities; and financial resources, as they impact quality of the program. Peer review is fundamental to quality assurance, particularly in professional programs in which practitioner experts must assist in developing and evaluating standards to ensure that students are trained in the most up-to-date practice in the field.

Continuous monitoring assures quality. Many accreditors require annual reports from each program on outcomes such as graduation rates, job placement rates and monitoring of student growth. Substantive change notices are required whenever there is a change that may affect student outcomes. If a concern about non-compliance arises—interim reporting is required until the concern is mitigated.

Accreditation standards are developed to ensure that education is relevant and of appropriate content, breadth and depth for entry to the specific profession—this is quality assurance. Quality improvement is also a critical part of accreditation. Programs must identify how they meet the standards, and are also expected to address areas with potential for improvement. This is one mechanism by which professional practice standards continue to evolve and improve.

Some areas in accreditation and higher education that could be improved:

- Students should have easy access to information that is useful, current and clear. Information provided by institutions should differentiate between institutional and programmatic accreditation and the related impact on the ability of students to become licensed or certified to practice in their field of study. For accurate accreditation information on programs, consumers should be directed to accreditors' own Web sites, rather than secondary sources.

- Accreditors should explain how they promote innovation. There is more than one way to meet accreditation standards, but all new initiatives must be verified for quality as determined by the profession to ensure that graduates are prepared to enter practice with a level of competence necessary to protect the public interest.

- Communication between institutional and programmatic accreditors should be improved. This communication is important, particularly when areas of concern are identified that may affect one or the other. Currently, it is very difficult to access some of this information due to confidentiality concerns.

Mr. Chairman, Mr. Ranking Member and members of the committee, thank you for this opportunity to talk to you today about the role of specialized and professional accreditors in assuring quality in our Nation's higher education institutions. My name is Laura Rasar King and I am the executive director of the Council on Education for Public Health (CEPH), a private, non-profit and independent accrediting agency recognized by the U.S. Secretary of Education to accredit schools and programs in public health offering post-secondary education at the baccalaureate, master's and doctoral levels. These programs prepare graduates for entry into careers in public health occurring in a wide variety of settings, including Federal, State and local governments; non-profit and charitable organizations; research settings; and other industries such as hospitals, insurance companies, pharmaceutical companies, and nonhealth-related businesses and worksites. CEPH is a relatively small agency, accrediting 153 schools and programs. While the agency is 40 years old, it is rapidly growing, with the emergence of public health as a field of need and interest, particularly at the undergraduate level.

Before I provide a perspective on how well the current system of accreditation is working to deliver quality assurance to students and the public, I would like to take this opportunity to put my comments into context by addressing specialized and professional accreditation in terms of its role, purpose and scope, as well as how what it does differs from the role, purpose and scope of regional (institutional) accreditation. Throughout my testimony, I will use the terms specialized, professional and programmatic accreditation interchangeably.

#### HISTORY AND STRUCTURE OF ACCREDITATION IN POSTSECONDARY EDUCATION

Specialized and professional accreditation has been protecting the public interest for over 100 years starting with Abraham Flexner's work to increase standards in American medical education. The nonprofit Association of Specialized and Professional Accreditors, ASPA—on whose board of directors I sit—has approximately 60 accreditor members who set national educational standards for 80 different specialized disciplines and professions. Thirty-four of these agencies are recognized by the U.S. Secretary of Education and 16 of those serve as both programmatic and institutional accreditors, providing access to title IV student loan funds. Professions range from medicine to project management and physical therapy to construction. Health fields are represented by over 35 members, and several others focus directly on the safety and protection of the American public, for example, engineering, architecture, and urban planning. These programs ensure students receive a quality education, consistent with standards for entry or advanced practice in a field or discipline. Through an emphasis on standards-based self-evaluation and peer-review, accreditation plays an important role in continuous quality improvement in higher education.

#### ROLE AND SCOPE OF SPECIALIZED ACCREDITORS VS. INSTITUTIONAL ACCREDITORS

Unlike *institutional accreditation*, which applies to a college or university as a whole, wherein academic and organizational structures and systems are reviewed to determine how the parts of the institution contribute to achievement of institutional objectives, *programmatic accreditation* conducts an in-depth assessment of *specialized or professional programs* that may be available through a college, a university or an independent institution. Specialized and professional accreditation closely examines and evaluates measures of learning or competence that are fundamental to competent practice in a discipline or profession.

#### PROCESS OF SPECIALIZED ACCREDITATION

Any specialized or professional program of study seeking accreditation undertakes a rigorous review process. It starts with self-evaluation against standards adopted by the profession and includes a comprehensive, onsite review and an ongoing process of continual improvement.

An important factor in the accreditation process is peer-review by experts in the field of study. A team selected by the accrediting agency visits the institution or program to determine first-hand if the applicant meets established standards. Evaluators are typically volunteers who are a mix of practitioners and academics with expert knowledge in the specialized area. While specific guidelines and standards vary by agency, most accreditors conduct reviews and assure quality in the following areas: professional or specialized program curriculum; teaching and development and/or application of new knowledge; ethics/integrity; mission, planning, evaluation and assessment of outcomes, including student learning; faculty qualifications; student support services, including academic and career guidance; library, information and learning resources; physical, laboratory and training facilities (as they apply);

and financial resources and program organization and administration to the extent that it impacts other critical areas.

CURRENT STATUS OF SPECIALIZED ACCREDITATION AND HOW WELL IT IS ABLE TO DELIVER QUALITY ASSURANCE TO STUDENTS AND THE PUBLIC

In the vast majority of institutions and especially in specialized and professional programs, I believe that accreditors do an exceptional job of quality assurance. Because it is my area of expertise, I will focus my remarks primarily on programmatic accreditation in terms of its constant feedback loop with practitioners in the field, the peer-review process, the process of continuous monitoring, and the inherent process of quality improvement.

CONSTANT INPUT FROM THE FIELD OF PRACTICE TO ASSURE QUALITY

One of the hallmarks of specialized and professional accreditation is the intricate relationship between the academic and practice community within the profession. This is critical in ensuring that graduates of professional programs are competent in current practice. Practitioners are involved in every step of the accreditation process. Each accreditor accomplishes this involvement differently, but by way of example, one of our accreditation standards requires that each program consider input from the local practice community on appropriate and current programmatic competencies. We also require that our programs regularly collect and consider input from both alumni of the program as well as employers on how well graduates of the program are able to meet the needs of practice. While our programs do this directly, as public health is an unlicensed profession, other professions coordinate detailed job task analyses—a practice-based and scientific determination of the tasks, skills and areas of knowledge needed for a job—originating from their certifying organizations. Most States have statutes requiring completion of accredited programs in order for individuals to advance to licensure and certification for entry to a profession. Programs must prepare graduates who are competent and capable of meeting State requirements, such as passing licensure examinations. Practitioners also review and comment on any proposed changes to the accreditation standards, participate in every onsite visit as peer reviewers and serve on the agency's board of directors with equal input into accreditation decisions. Specialized accreditation is fortunate that it is so focused in nature—identification of needed professional skills and evaluation of student learning is straightforward.

PEER-REVIEW IS FUNDAMENTAL TO QUALITY ASSURANCE IN PROFESSIONAL PROGRAMS

I would also like to emphasize the strength of—and the importance of—the peer-review process which has taken some negative criticism over the past few years in relation to accreditation. For professional accreditation, peer-review is necessary to ensure that professionals are appropriately trained consistent with the best practices of the discipline or profession—hence the role of professional judgment is fundamental to the enterprise. Keep in mind that peers are not only academic peers but also practitioner peers. Imagine you are going to have a root canal, get a prescription filled or even have your dream house built—I'm sure you would much prefer that your dentist, pharmacist and builder has been trained in a system where other dentists, pharmacists and construction experts have contributed to the development and assessment of quality standards for those educational programs. The process of peer-review contains a rigorous system of checks and balances. The process ensures objectivity and avoids conflicts of interest between accreditors and the institutions and programs under review. Specifically:

- There are **formal written policies and procedures which eliminate bias** Among peer reviewers, decisionmakers, staff and academic institutions and programs.
- **Accreditation standards are developed in a collaborative and inclusive process** with input from educators, practitioners of specific disciplines, members of the public, students, employers and State regulators, among others.
- **Peer reviewers undergo extensive training** in accreditation standards and procedures, including any that are specific to their professional discipline. Briefings and advanced training are expected, especially for those conducting onsite visits.
- **Most peer reviewers are volunteers** who are dedicated to higher education or their specific field. Reviewers spend significant personal time reading and evaluating extensive documentation, visiting institutions and then collaborating to produce a report.

## CONTINUOUS MONITORING IN QUALITY ASSURANCE

As you noted in your letter of invitation, Mr. Chairman, accreditation is obligated to serve two primary communities of interest: students, and the customers, clients and taxpayers that they will one day serve. To understand how well accreditation is able to assure quality in higher education, it is important to understand how accreditors ensure that quality standards are and continue to be met. I described earlier in my testimony how standards are developed to ensure that education provided by programs is relevant and of appropriate content, breadth and depth for the specific profession. I also described the peer-review process in evaluating whether those standards are met. In most cases, this comprehensive process occurs every 5 to 10 years—in my agency it occurs every 7 years. However, accreditors are in regular contact with each accredited program throughout that period. For example, my agency requires annual reports from each program on critical outcomes such as graduation rates, job placement rates and monitoring of rapid student growth. Substantive change notices are submitted and considered whenever there is a change that may affect student outcomes. Whenever there is a concern about non-compliance—from any source—interim reporting is required until the concern is mitigated. Complaints are considered and addressed when they arise. This means that most accreditors have multiple contacts with each accredited program on an annual basis. Monitoring is regular and it is substantive. Accreditation is high stakes for institutions because of the funding link. Specialized accreditation is also high stakes for accreditors, especially in the health professions because an improperly trained graduate could hurt someone. For this reason, my colleagues and I take quality assurance very seriously. I believe that specialized accreditors assure competence for entry to practice exceptionally well.

## QUALITY IMPROVEMENT AND INNOVATION

From my perspective, assurance of entry-level standards is not the only job of an accreditor. Quality improvement is also a critical part of the process. A criticism I often hear about accreditation is that it takes “too long” to get through the process. The process can seem long. However, much of that time is spent in the self-evaluation component of the process. Accreditors expect not only that institutions and programs self-identify to what extent they meet the standards, but also to identify areas with problems or needing improvement—and they are expected to address those. This constant evaluation, adjustment and re-evaluation takes time, but, I believe it is time well spent. In addition, beyond entry-level standards set by each accreditor, most accreditors also have an expectation for programs to identify areas for special focus and improvement. This is one mechanism by which professional practice standards continue to evolve and improve. This is one of the reasons that the United States has some of the most well-respected leaders in the world in nearly every profession. This is also the space in which innovation can flourish.

Innovation is also an area in which accreditors receive criticism. We have been accused of “stifling innovation” or “rigorously enforcing standards that were current 30 years ago.” Even in my own profession, there is urban legend about what we would “never allow” and it always surprises me. We expect programs to continue to improve even if they are meeting the standards at the basic level. However, there are many ways to meet the standards—and accreditors are open to differing approaches programs may present.

In fact, CEPH has a long history of working with our programs to accommodate innovation as it relates to quality education. We accredited our first distance-based program in 1991—now 20 percent of our accredited schools and programs offer the Master of Public Health (MPH) degree in a fully online format. We accredited our first collaborative program—a joint program sponsored by more than one university in 1986—and now we accredit seven multi-university collaboratives, with more on the way. These are only some examples from my own experience. I know that my colleagues in specialized accreditation in other fields could give you other examples.

## AREAS FOR IMPROVEMENT

As in any system, there is always room for improvement. It's important to note that quality assurance and performance improvement are key principles and values of programmatic accreditors. Just as they expect these activities of the programs they accredit, they have similar expectations for themselves. ASPA members endorse a code of good practice that addresses promotion of the development of educational quality, integrity and professionalism in accreditation activities, and respect and promotion of institutional independence and academic decisionmaking. Our members contribute and look to the association to provide opportunities and edu-

cation for professional development and improvement. Several accreditors undergo “voluntary” recognition. That being said, there are several areas in accreditation and higher education that could be improved.

STUDENTS AND FAMILIES SHOULD BE EMPOWERED AS CONSUMERS IN HIGHER  
EDUCATION WITH ACCESS TO GOOD INFORMATION

Information provided to students and the public should be useful, current and thoughtfully presented in a manner that is understandable and easily accessible. Programmatic accreditors typically require programs to provide public information about their accreditation status. Often, information provided by institutions—whether intentional or not—is not clear about the differentiation between institutional and programmatic accreditation and the related impact on the ability of students to become licensed or certified to practice in their field of study. The general public does not understand the difference between the types of accreditation and what it may mean to future career options. Accreditation requirements for clarity, full disclosure and accessibility in this area would enable students to make better decisions regarding their education choices. As well, information about how former students have performed in the program should be available. Information on college Web sites should be up-to-date, provided in plain language and not buried.

The responsibility for accuracy and currency of available information lies not only with the accreditors. Identification of a quality program is more difficult than one would think because of the volume of information available. There are multiple Web sites and databases out there from even reputable organizations that do not get it right. For example, despite their best efforts, the USDE accreditation database is inaccurate, outdated and not in a format that gives the best information for the public. I fear that the newly proposed rating system will be yet another source of information which leads to confusion among prospective students. Accreditor Web sites are required to be up-to-date in order to meet recognition guidelines. We recommend that the Department abandon its effort to track accredited programs in its database and provide links directly to accreditors’ Web sites, so that consumers can access the most recent and accurate accreditation information, along with an explanation about what it means for them.

ACCREDITORS CAN DO A BETTER JOB OF EXPLAINING HOW THEY PROMOTE INNOVATION

Programmatic accreditation supports institutions and programs that wish to explore new and different ways to provide education. In my experience, because accreditation is not well understood by even those who lead in academic settings, it is often used as an excuse not to innovate. I have been called numerous times by faculty members who want to try something new at their institutions and have been told by their colleagues that it “isn’t allowed” by the accreditor. This is not true for my agency. What is true, is that all new initiatives, whether they are considered innovative or not, must be verified for quality as determined by my profession to ensure that graduates are prepared to enter the field of practice with a level of competence necessary to protect the public interest. These quality indicators may be vastly different depending on the profession, but in all cases students must achieve successful results in knowledge and skill development in a specific field. In the absence of such evidence, innovations chosen primarily based on cost or other criteria not related to the development of student competence in the field, risk long-term negative consequences for the various disciplines and professions, particularly in terms of their responsibility to serve the public.

THERE SHOULD BE BETTER COMMUNICATION BETWEEN INSTITUTIONAL AND  
SPECIALIZED ACCREDITORS WHO WORK WITHIN THE SAME INSTITUTIONS

Unless a specialized accreditor is also an institutional accreditor working with a single purpose institution, programs exist within the context of a larger institution. Specialized accreditors require that the institutions in which they work be institutionally accredited to ensure that the overall context of the program is reputable and sustainable. Often, different specialized accreditors work side by side within a university when a number of programs are housed in the same organizational units. It is important that the institutional accreditors and the specialized accreditors as well as specialized accreditors in related fields, share information, particularly when areas of concern are identified that may affect one or the other. Currently, it is very difficult to access some of this information due to confidentiality concerns. A mechanism for information sharing currently does not exist, and if it did, it could lead to the ability to more quickly address problems within an institution before they become insurmountable.

I appreciate the opportunity to speak to you today about specialized and professional accreditation and look forward to assisting you and your staff as you develop ideas for reauthorization. I would be pleased to answer any questions you may have.

The CHAIRMAN. Thank you all, very much, for very poignant, very concise statements and for your longer statements, which I had time to go over yesterday and last night, since we were in until about 2 a.m. this morning. I appreciate that very much.

We will begin a round of 5-minute questions here.

I just want to start off by sort of a general kind of approach. You have all touched on the issue of innovation. We hear a lot about that here, new innovations in schools.

I just asked my staff for data that we have heard once before, that traditional students—maybe the kind that we were at one time—18 to 22 years of age, attending college full-time and living in residence, now constitute considerably less than one-third of all undergraduates. That is amazing. That is a huge shift in just the last few years.

More and more types of innovation are coming along. We had a whole series of hearings on this committee on the for-profit schools and their tremendous growth in the last 20 years. Now, we hear about MOOC's, and iTunes U., and TED.com, and I mean who knows what else is going on out there.

There was a story in "*The New York Times*" the other day, I am sure maybe you saw it, about these new innovations. Not about their success, but about their failure, and how many are failing students.

Now I hear about new innovations where institutions, or let me put it this way, concepts of new institutions of higher learning should be able to get access to Federal student aid. Their students should be able to get access to Federal aid even though they have not been accredited because they are not even established yet.

Why should they be established for 10 years or 12 years before they get accreditation? That blocks innovation, I am told. I do not know what the answer to that is. So we are kind of caught, at least I am, betwixt and between. We do not want to stifle innovation. I do not want to be one of those that say, "The way I went to college and the way I learned was the best, and we have got to keep that no matter what." Sometimes things change. People learn differently. My kids, when they were growing up, learned a lot differently than how I learned.

We want innovation, but we want the quality assurances. We want to protect taxpayers' dollars; we do not want it wasted. We do not want it to go to just build new edifices or to do maybe things that are not geared toward student learning, or to go to profits for Wall Street firms and things like that. We have to be good stewards of taxpayers' dollars and try to make sure students get quality learning, but we do not want to stifle innovation. How do we do that dance? I am not certain, and that is why we are looking to you and accreditors to try to give us some way forward on this.

I think Senator Alexander is absolutely right. We just keep reauthorizing these bills and every time we do, we get more regulations and more paperwork, but I am not certain that is the answer either.

I have taken a long time to say that, but how do we try to balance innovation and new concepts with quality assurance and being, again, protective of taxpayers' dollars? That is just a general question, but I think it weaves through everything that you have all talked about, whether it is community colleges or whatever.

Dr. Levine, let us start with you. Just a brief response, my time is almost running out.

Mr. LEVINE. It is the toughest question there is right now.

When the United States moved from an agrarian to an industrial society, our existing colleges did not work anymore. Connecticut looked to Yale and said, "Your program is irrelevant. We are not going to give you any more money." So we reinvented higher education.

We created universities which were radical institutions. These guys were going to prepare people for professions, do specialized study, advanced study. We created technical institutes like MIT to prepare people for an industrial society. We created land grant colleges that would straddle both worlds. And we created junior colleges so we could move this stuff locally.

We are in the same place right now, which is to say that the current system of higher education was built for an industrial era, we are moving into an information economy, and we are going to reinvent higher education. We are going to see kinds of institutions that are universal access, that are low cost, that are digital, and that focus on outcomes rather than hold degrees, and perhaps focus on competencies.

So the real question for us now is: what do we do immediately given that it is going to be influx and it is not going to sort itself out for decades? And I think we can do it, pick some of the early trends and say, "Yes, we are going to focus on those now."

We know we are moving from process to outcomes, so let us start to focus on outcomes in a very serious kind of way. We have some of that data now. We can get some of that data in the future. We know we are going to do digital, which is going to cross boundaries from regional accrediting associations. Let us focus on that one right now.

We know we are going to see new providers. Let us start looking at those new providers in ways we have not looked at them before as candidates for accreditation.

The CHAIRMAN. I have a lot of followup questions. Anybody else? Yes, doctor. Go ahead, Dr. Wolff wanted to respond. I am sorry to take so much time.

Mr. WOLFF. Thank you. Well, I would agree. It is a major question. I have tried to address it in my longer written testimony.

But first I want to say that I think we need to acknowledge that existing accreditation is trying to respond to innovation. Having worked with Western Governors University and its establishment, and more recently with Minerva which has received a lot of publicity, and University Now and others, and being in Silicon Valley, I talk a lot with the providers of MOOC's.

First we need data about what is working and what is not. Second, we need to acknowledge it takes a very long time to become accredited. Federal law requires that we cannot accredit until there is at least one class of graduates. Is that appropriate? One could

argue it is; one could also say we need a quicker design build process. Here, I believe, transparency is important, experimental approaches are important, and outcomes-based approaches are really important.

Competency-based education is something very new where direct assessment is being involved. It is not so much new, but the idea going off the credit-hour. We need to monitor these and accreditors have been responding to them, but working with people in Silicon Valley, I can tell you that they view that accreditation takes too long. It is too costly and puts them in a catch-22. They can operate without accreditation, even without financial aid, but recognition of the credit. Or, if they have to wait 4 to 6 years, they may not survive.

So we do need some processes and this is where I propose that we try some experimental or pilot processes either within existing accreditors or as a separate one using experimental sites authority to experiment with what a new approach would be or several new approaches.

The CHAIRMAN. Dr. Phelan.

Mr. PHELAN. Mr. Chairman, I guess I first would say that I think it is unfair to saddle accreditors with being the barriers to innovation. I do not think that is true. In fact, I would say at my own institution some of our very policies, some of the procedures and history, the culture of our organization can be a barrier as much as the State Department of Education, for example.

I have not experienced a blockade to innovation on my campus. Indeed, we are flipping our classroom from an instructional point of view, putting more burden on the students and collaborative responsibility of our faculty, for example.

We have implemented quality standards around the Malcolm Baldrige National Quality Award principles in support by our local accrediting body. We have added housing.

Are there some areas they can improve upon? Certainly. When we added another campus on the north side of town, we had to get the accreditors involved. Did that make sense to me? Not so much. But I think we also need to find some kind of common ground in the middle there where we can say, "We need to have a thoughtful and deliberative approach to what the new innovation is."

Imagine where we would be right now if we went willy nilly out and approved MOOC's for accreditation, that these were accredited programs. It takes thoughtful and deliberative time for us to evaluate the quality and the efficacy. We have that responsibility for the students and for the taxpayers, and I think we need to retain it.

Can we find some common ground? Yes. And I think my right honorable colleague here is exactly right. We can start with some pilots like Southern New Hampshire has been and Western Governors with competency-based education, for example.

I think there is some common ground, but I do not think it is fair to burden the accreditors entirely with this innovation limitation.

The CHAIRMAN. Ms. King.

Ms. KING. Yes, I agree with my colleagues.

I would also go back, even in my own experience as an accreditor, there is a lot of urban legend out there about what ac-



creditation will not allow you to do. I get those phone calls frequently from universities if some faculty member has a great idea for a way to innovate, and they are told by other faculty members, "Oh, the accreditor would never allow that." Well, they never checked in. We are happy to work with them on new and different approaches and ways to handle things that they want to try. We do not call them official pilot programs, but we certainly work through them. We work with the universities.

Our main concern is about the outcome. Will students be able to learn and be competent at the end of the program?

The CHAIRMAN. But you are talking about just a certain course of study, are you not now?

Ms. KING. Yes, that is correct.

The CHAIRMAN. Right. Thank you all very much. Dr. Wolff, I am sorry.

Mr. WOLFF. If I may, just one brief comment. Let me try to categorize.

There are a lot of changes occurring. Some are within institutions, regional accreditors and other accreditors deal with those. Others are new providers through affiliation agreements. These are controlled by Federal regulations, substantive change, and the like; Minerva working with KGI, Embanet and 2U, and with USC and Northeastern, and the like.

We need to be able to look at what are those innovations? How do we promote those kinds? And third are whole new institutions with lots of new ideas. I think we need to break down where is innovation occurring, and where does the systems do good work, and where there is a lot of new work occurring often is outside of existing traditional institutions. We need to figure out a process to deal with them.

The CHAIRMAN. Thank you all very much. I really went over my time.

Senator Alexander.

Senator ALEXANDER. Thanks, Mr. Chairman.

I am sitting here and I have come to think how remarkable it is how our higher education system has emerged. I mean, basically, we have a self-regulated marketplace of 6,000 or 7,000 different reasonably autonomous institutions into which the Federal Government pours about \$135 billion a year and what we as trustees of all that money—I mean, it does not have to be that way.

We could operate colleges and universities the way China operates its education system or the way we operate our public schools, which is the same. We could tell everybody where to go to college, and we could tell the colleges what to teach, and we could regulate them from Washington. That is what we could have done. But really because of the accident of the G.I. bill and the accident, really, of when somebody thought, "Well, we are spending a lot of money. We have got to make sure it is going to appropriate institutions." Instead of setting up an agency in the Department of Education in Washington to do that, we said, "We will rely on you. We will rely on the accreditors to do that."

That is something, I think, we need to keep. And I think you are more likely to be able to respond to the innovation than Members

of the Senate, or Members of the House, or a group people in the Department of Education in Washington.

However, help us sort out what accreditors are supposed to do. What the Federal Government is supposed to do. And what accreditors are doing now, that you do not need to be doing.

For example, the way my staff counts it up, there are about 93 different boxes that we require a regional accrediting agency to check as it goes through. Things like, "Have you written plans to maintain and upgrade facilities, equipment, and supplies?" Whether the budget allocates resources appropriately, whether the facilities meet safety and fire codes, and whether they have adequate administrative staff.

When I was president of the University of Tennessee, they came and made me build a new law building, when I had rather spent the money somewhere else. Or when I was Education Secretary, the middle States' accrediting agency was telling some church college it had to put more women on its board of directors, diversity was its big issue.

I mean, are there not some things that the Federal Government requires accreditors to do that do not really have anything to do with quality? And that if you could focus more on quality and less on these extraneous things that you might be able to do a better job? And then, how do you draw the line between how we, in the Federal Government, make sure that the money we spend, that the institutions are in compliance with the financial stuff? Keep that over here and let you focus, if you are an accreditor, on quality. Not just on how to get the quality, but more and more on outcomes, whether there is quality.

Help us draw those lines.

Mr. WOLFF. Let me identify three areas that would be helpful to be released from obligations.

First, is to look at the 10 areas in which standards are mandated, and whether all of those continue to be relevant.

Second, the substantive change procedures require even those institutions that have well established themselves to go through laborious processes of prior review and approval. And there is not a way, I could go into greater detail, and even if you give them a blanket approval, then you have to go visit other sites at the back-bend.

But this is where risk-based accreditation should be adapted so that when an institution has established itself, the requirement that every standard be reviewed and compliance be established is, for many institutions, not useful. We really need to focus, put the emphasis on different syllables, which are really: what is good learning? And how do we engage faculty in that? How do we improve retention and graduation? This is where we need to be freed up where institutions that are well-established have addressed themselves.

Third, the law requires anytime there is a change in modality that we need to go through an approval process. Well, online education—

Senator ALEXANDER. What do you mean? What does that mean?

Mr. WOLFF. That is a good question. That is what the law says. The way we have interpreted it is online education. If you move

from classroom to online, it requires prior review. We do not require a lecture at a seminar. But again, some institutions have well-established their ability to move into new modalities, and on-line education is not so new.

Senator ALEXANDER. You mean, if Duke University decides to teach environmental management online partly rather than just in a classroom, that would require a different accreditation?

Mr. WOLFF. It would require, my understanding, I cannot speak for SACS, but I would believe that SACS would require Duke to go through a substantive change process and have that program reviewed before it is shifted to an online environment.

So the recognition process itself—I have said this to the NACIQI, the National Advisory Committee on Institutional Quality and Integrity—as a leader of an organization that tried to shift our focus to learning and to outcomes, the whole recognition process was on policy, paper, and process. Not a word was ever expressed, not anything was filed with respect to what we were doing with retention or outcomes.

The whole process, in my view, there ought to at least be an alternative process where you could go forward and focus on outcomes rather than inputs.

Senator ALEXANDER. Mr. Chairman, my time is up, but I wonder if I could ask each of the witnesses—it would be helpful to me and I imagine to all of us, and you have done some of it in your statement—if after the hearing, you could answer the question I just asked by specifically identifying the things that we require accreditors to do that are not as useful today and that we could drop so that you could focus more attention on quality.

[The information referred to was not available at time of press.]

The CHAIRMAN. As you can hear, the bells, we are now into the second part of the first vote. There are two votes. So that means we have 5 minutes left, is that right, on this first vote? So I think we are going to have to go pretty soon, but this is so important.

We are coming back. We will go over and do this vote. I ask people to vote early on the next vote, and we will come right back, because I intend to continue this at least until 12:30, maybe 12:45 if there are other Senators that might show up.

I ask you all then. We will take a break now, and we will be back, hopefully, in about 20 minutes. Thank you.

[Recess.]

The CHAIRMAN. The committee will resume its hearing.

I thank you all for your indulgence and for waiting here as we did these votes.

Now, I am pleased to recognize Senator Franken.

#### STATEMENT OF SENATOR FRANKEN

Senator FRANKEN. Thank you, Mr. Chairman.

I read in one of your testimonies last night that universities and colleges put a lot of effort into getting accreditation, but that it is sort of hard to get unaccredited.

How many colleges lost their accreditation, say, 2010–11? Anybody on the panel.

Mr. WOLFF. I really do not know the number. What I would say is that this is why I am such an advocate of transparency.

I think that the framing of the question is the way accreditors look at it: how many institutions have we turned around through sanctions through ongoing monitoring? We have very rigorous annual and more periodic financial monitoring.

So I would say that one way of looking at the question is probably about 5 to 10 percent of institutions are on some form of sanction. Over 50 percent are monitored outside of the comprehensive review process.

In my tenure at WASC, over 30 years in which I have worked at WASC, probably about five institutions, five or six, lost their accreditation. But I would say it is about 5 times that or maybe 10 times that they were placed on probation or show cause where they actually had to make dramatic change.

Senator FRANKEN. OK. Do you all not know this because of lack of transparency?

Mr. WOLFF. No. I just do not know for all the other regions how many, at least, speaking for regional accreditation or national accreditation, how many over a particular timeframe were terminated.

Senator FRANKEN. OK.

Mr. LEVINE. I would add to that point to say you can probably count the number on both hands. And the reason for not knowing it or not being able to give it is exactly what was described.

There are probably hundreds of accrediting associations in this country. Given that, one does not know what each one is doing.

Senator FRANKEN. I was just wondering because we have heard testimony on some schools and you were talking about the entrepreneurial school. I would assume that you mean, by that, the for-profit schools.

We have heard testimony in this committee of some pretty egregious situations where someone will take a course in something, some technical thing, for example, I think reading sonograms, and then they cannot get hired anywhere because no one recognizes their course. We were wondering why have they not lost their accreditation, this institution?

I just think it is interesting that none of the four witnesses could answer that question, how many colleges have lost their accreditation in the last couple of years.

The CHAIRMAN. If the Senator would yield, then, I will give him more time.

Senator FRANKEN. Yes.

The CHAIRMAN. I asked my staff. CRS has the answer on regional accrediting agencies. Was this just last year? In 2010 and 2011, 4 lost. Now here are the other ones, national faith-related, 3; national accrediting agencies, 13 nationwide.

Senator FRANKEN. OK.

The CHAIRMAN. 2010–11. So from the regional, only four.

Senator FRANKEN. I see. OK. Well, I will move on because I want to get this. Dr. Phelan.

Mr. PHELAN. I think there is a distinction that needs to be drawn between institutional accreditation by the regionals and program accreditation.

Senator FRANKEN. Yes, OK. I understand that.

Speaking of programs, I will try to transition here. Dr. Phelan, I see that you are president of a community and technical college.  
Mr. PHELAN. I am.

Senator FRANKEN. Yes. One thing that I have noticed in my State, and this is true all around the country, is we have this thing called the skills gap. The skills gap is about one-third to one-half of manufacturers in my State have jobs that are available to people, that they cannot fill. This is in a time of continued high unemployment. If these people were skilled up, they could get jobs. We could fill these jobs. That would help the manufacturers, in many cases manufacturers, in some cases in healthcare, in some cases it is in IT. And I know you are president of a community technical college.

I have seen a lot of productive partnerships between businesses and the community and technical colleges where they offer maybe a design course by the businesses, say, a precision machine tooling or something, CNC work. It is great. It works terrifically.

I was wondering, what is the process by which those programs get accredited and are there any barriers to that, that I need to look at? Because I have a bill called the Community College to Career Fund Act to incentivize those partnerships between businesses and the community and technical colleges to train people up for these jobs.

Mr. PHELAN. Thank you for the question, Senator.

What I would say is that there are those kinds of partnerships taking place right now. For example, Jackson College is providing leadership with the State Government to implement a program called the liaison program that allows us from the community college to go to the high schools and help these young men and women understand what these middle careers look like. They are not their mom and dad's old program. These are highly technical positions, highly compensated in the middle skills' area.

So part of the challenge we face is getting young men and women to understand that these are different jobs fundamentally and require a higher level of education in getting the work out.

Senator FRANKEN. Yes.

Mr. PHELAN. In deference to your second question you asked, you are talking about specific program accreditation.

At Jackson College, for example, we are working with NLNAC, the National League for Nursing Accrediting Commission, for supplemental accreditation, program accreditation for our nursing program. We are accredited as an institution from the Higher Learning Commission, institutional accreditation. We have gone after NLNAC for nursing. That takes a period of time.

Some of that information they have asked for is duplicative of that which we provide to the regional commission, but it takes a fair amount of time for us to demonstrate the competence, the skills, the resources that we have available, and deployed for that supplemental accreditation. It has taken us a couple of years to move through that process. We hope to finish it up here by next spring.

Senator FRANKEN. I think that is all well and proper. It is just that we have, really, a crisis in this country. I think there are about 3 million jobs out there that could be filled this instant if

people had the skills, and I just want to make sure that there are not unnecessary barriers to doing those kinds of partnerships.

Mr. LEVINE. There are actually ways to speed it up, I think. If these were done as non-degree programs, simply scaled programs being offered through continuing education, the only real cost would be hiring faculty and getting the equipment that is the latest, up-to-date equipment used in that industry.

Senator FRANKEN. OK. Thank you. I may pursue that with you further out of the hearing setting.

Thank you, Mr. Chairman.

The CHAIRMAN. Thank you, Senator.

Senator Murphy.

#### STATEMENT OF SENATOR MURPHY

Senator MURPHY. Thank you very much, Mr. Chairman. Thank you all for being here.

I think this is a fascinating time to be in your line of work, just as interesting to be on this committee as the industry and the practice of higher education transforms before our eyes.

We had a panel on innovation maybe about a month back and equally stunning to hear about all of the different innovations that are happening. You all have addressed how accreditation keeps up with innovation today.

But I was really struck by the fact that on that panel, as proud as all of the administrators and policymakers were about innovations, on the entirety of the opening remarks on that panel, there was no talk about how those innovations were going to directly relate to affordability. Nobody talked about how the innovation was going to have an immediate impact on the price of college. And it also strikes me that we have not talked yet, really, about the issue of affordability here.

I want to go back to a question that Senator Alexander raised. He asks the best questions. But one that he asked that did not get addressed by the panel was how you separate out the roles and responsibilities of accreditors versus the roles and responsibilities of the Federal Government and State regulators.

It strikes me that there is not anybody today that is really forcing college administrators to wake up every single day and think about affordability. You talk about measuring outcomes, well, outcomes can be graduation rates, they can be loan default rates, they can be job placement rates. But all of those connect back in some way to the price that students are paying for their degree. They need a certificate that gets them a job, but they also need to get through at a price at which that job and that salary allows them to repay the money that they may have taken out.

So I guess I want to reframe Senator Alexander's question through the lens of affordability. What role does accreditation play today in paying attention to the price that students pay for the degree? Should they, as we take a look at new methods of accreditation, place a greater emphasis on affordability? Or, is that just something that the Federal Government through the allocation of title IV dollars or State Governments through their regulatory processes should be paying attention to and it should not be really a question that accreditors are focused on?

Mr. Wolff.

Mr. WOLFF. Let me try to take a stab at that.

First, we do not view ourselves as being able to set or to comment on whether a tuition is too high or too low. And for public institutions, it has often been a response to State budget cuts, and we have no control over that.

There have been times where I will say that our Commission, and I believe other commissions, have expressed concern that cuts have gone too deep, and have really had an impact on quality.

That being said, there are three areas in which I think I could, at least, speak. One is there are new institutions that are trying to address the cost and affordability issue by lower tuition or no tuition at all—University of the People and others—that are seeking accreditation and we have to be open to very different models that they will use to address or to come. University Now, for example, has actually gone off the title IV grid and is trying to bring the cost down to a very affordable level. We need to be open to those experiments within institutions.

Second, competency-based education has the potential of really moving. So a student only needs to take what he or she needs. And we have developed procedures to do that, and the Department has offered experimental sites looking into that. I think that is a potential.

The third issue, and I have thought a lot about this is: are the recommendations we make going to add to costs or are they going to add effectiveness? There is a difference, you can require. I think we need to be, again, more sensitive of where our recommendations have a consequentiality around improved effectiveness, not just increased costs that do not lead to improved student completion or student learning outcomes.

Mr. PHELAN. Senator, I could let you know that I do wake up every morning thinking about affordability, particularly for the kind of unwritten mandate for community colleges where the national tuition average for us is about \$3,200. I am mindful of that.

I am mindful about the fact that it has an impact on our students. I am mindful of that in terms of the default rate of how students are handling this back at their own homes, and the impact upon our institution.

I do think that we have to find ways, however, to find those programs and services that matter, that lead to the outcomes and figure out a way how we can scale those up.

I am mindful as a community college that we have more people coming to us with a greater level of diversity with higher expectations for outcomes and wanting that at a much lower cost. I am mindful of that every day and trying to figure out how I thread that needle is incredibly difficult for us to do.

Senator MURPHY. Dr. Levine.

Mr. LEVINE. Cost is one of those issues in which there are no heroes.

What I would say here is that, yes, part of it is increasing regulation. Part of it is reduced support for higher education at the State level. However, higher education is also responsible for the rises.

It is one of the only industries I know in which competition actually increases cost. It is also an industry in which we engage in

cost-plus pricing. It is also an industry in which we grow by addition not by substitution, so we keep what we have and we keep adding to it. All of those are cost drivers.

Who should do what? It seems to me in talking to both legislators and Governors that people are becoming increasingly disenchanted with the cost of higher education. And if institutions do not act, it is quite likely we will see regulation occur in Washington and other places.

I think it behooves accreditation to take on a larger role in this area as a self-policing responsibility rather than letting it occur outside.

Senator MURPHY. Thank you, Mr. Chairman.

The CHAIRMAN. Senator Warren.

#### STATEMENT OF SENATOR WARREN

Senator WARREN. Thank you, Mr. Chairman, Ranking Member Alexander. I apologize for my late arrival. We are trying to cover two hearings.

I had some questions I wanted to ask about accreditation. Accreditors serve an incredibly important role in the higher education system, and they are the primary gatekeeper for Federal aid. At a time when student debt is \$1.2 trillion and Federal funding is scarce, it is essential to ensure that our taxpayer dollars are going to schools that are good stewards of this investment.

There seem to be some conflicts of interest that are inherent in the accreditation system, and I think it is important to talk about how those conflicts affect outcomes of the accreditors' evaluations.

Accrediting agencies get paid by member colleges. To be federally approved accrediting agencies, the accreditors must demonstrate wide acceptance of the policies and procedures in the higher education community.

So my question is: Does that mean if an accreditor is tough on its colleges that the colleges can seek to unseat an accreditor just by claiming that the practices are not widely accepted? Anyone?

Dr. Wolff.

Mr. WOLFF. It is a very good question. And I know that we, in the accrediting community, are challenged by the fact that it is a peer-review process and our financial support does come from our institutions. We are quite aware of that fact. I will say as one who has worked with accreditation, I have never seen my Commission, or really in observing other commissions, shirk their responsibility to serve the public interest.

In my view, this is where transparency plays a really important role. You need to see what we do. You need to see our team reports so that you would have confidence and in the actions of our Commission that a perceived conflict of interest, or potential one, is not real.

Senator WARREN. I appreciate the point, but it seems to me that if accreditors are doing the main thing we need them to do, which is to crackdown on poor performing schools, that there is a problem here because then you have at least some schools who are going to complain bitterly about the accreditation process. And so I raise it because it worries me.



The conflicts of interest we saw with the credit rating agencies in the financial services industry created some real problems for us: unreliable assessments of financial products made those conflict-ridden credit agencies a key factor in bringing down our whole economic system. And in higher education, unreliable assessments of quality put both students and taxpayers at-risk particularly if they encourage students to go into debt or to go to colleges that are not providing a meaningful education.

I think we have to take a very close look at the role the Federal Government plays in exacerbating the conflict problem with the accrediting agencies.

I want to ask another question about accreditation. I see that the process is very complex, that accreditors look at a number of factors and weigh them against one or another to make an overall determination about institutional quality.

I can imagine from the inside assessing quality seems pretty complicated. But I have to say from the outside, it does not look like it should be quite so hard. And I say that because the goal of accreditation, as I understand it, is not to distinguish the fiftieth best college from the tenth best college. The goal is to identify the schools that are of really low quality. And it seems to me that with just a few pieces of data—high student loan default rates, extremely low graduation rates, poor retention of students with Pell grants—that it is possible to identify a school that is providing a poor quality education or that is wasting the Government's resources.

I realize that may not tell us everything about what is going on at a college, but it gives the key information that this is a very risky place for a student to try to get an education.

So what I want to understand is why accreditors are not drawing a line in the sand so that it becomes immediately clear when a college is not serving its students well.

Ms. KING. Thank you for the question, Senator. That is also a concern for me as well.

I come from the specialized realm, so our programs are the programs that are accrediting the folks that become your doctors and your physical therapists, your engineers, people who could actually hurt someone if they are not doing their job appropriately and their education is not appropriate.

We do draw a line in the sand. We can identify poor performing programs. And, in fact, those programs never, in my experience, make it through our process to the point of accreditation.

Senator WARREN. So if the Chairman will bear with me for just another minute on this, if I can push this. Let me ask the question specifically about undergraduate education.

Should there be a bright-line beyond which we say a school should not be accredited? If there is a graduation rate that is so low that that should mean, bright-line, the school is not a school that should be accredited. If you do not have a graduation rate of 50 percent, or 25 percent, or 10 percent, or 5 percent, should there be a bright-line on this?

Dr. Levine, what do you think?

Mr. LEVINE. Bright-lines are tough.

The one thing I want to say is of this panel, I am the only one that does not have a dog in this hunt so that I am not from an accrediting agency. I am no longer a college president. What I am is somebody who studies higher education, and what I would say about it is if we have a 50 percent as a bright-line, we have just closed every community college in the United States, I think, or pretty close.

Part of what we are really looking at is: why is this attrition happening? Some people do not go there for degrees.

Senator WARREN. Fair enough and there may be ways you have to step some of this in, but is there no number, 25 percent, 5 percent?

Mr. LEVINE. There are lots of numbers.

Senator WARREN. One percent? If you are not graduating somebody, why is this called a degree-granting institution?

Mr. Phelan.

Mr. PHELAN. Senator, just a few comments. I think what you are speaking to is an expectation of increasing transparency, and I fully support that.

However, to your bright-line question, the question begs another, and that is: what are the unique circumstances in which this institution exists? Are you going to have the same bright-line for a community college in inner city Chicago over rural Kansas, for example?

It strikes me that as we come to some metric of what these should be, there has to be some understanding of the demographic, the SES, the social economic condition of that environment, and then make some judgments.

Even more importantly, I think, which is embedded in your question is we need accreditation to do a better job of being transparent, and in ways that the average person can understand, not depths, and piles, and reports but clear, understandable text about the quality of this institution. Let the parent and the student then decide, and they will vote by their feet. And ultimately, that school will close or lose its accreditation because they do not have students.

Senator WARREN. Well, I will stop here because the Chair has been very patient in letting me go over time, but I will say on this, the focus, the important focus at the low quality schools. We have got to give the information to our students and to the Federal Government so that we are not pouring more resources into a place that is not providing a top quality education because those are resources that could have gone to schools that are willing to provide that education.

We should not be loading our students down with debt that they are going to be obligated to deal with for a lifetime when they did not get an education in return for that. Thank you.

Thank you, Mr. Chairman.

The CHAIRMAN. Thank you, Senator Warren, for your contribution. I appreciate that.

Going back to Senator Franken's question about accreditation—I had my staff look it up. Regional accrediting agencies terminated or removed 4. National removed or terminated 13. Programmatic accrediting removed or terminated 74. So I look at the 4 and the

13, and that is out of over 7,000 institutions. Well, that either means 6,996 are doing a great job or maybe our standards are too low. I do not know. Which is it? I ask that question rhetorically.

Then that begs another question. The more I have gotten into accreditation and how it is done, we rely on peer reviewers to do the site visits. And as I have learned, these peer reviewers get paid for doing that. They go from one college to another. They do not get paid for doing that?

Mr. LEVINE. No, it is like jury duty.

The CHAIRMAN. I saw some that did.

Mr. WOLFF. No, they are not paid. The Higher Learning Commission does give a small stipend to the SAC's. The Higher Learning Commission is \$150 a day, well below. All of ours are volunteers; most are all volunteer with only expenses covered.

The CHAIRMAN. OK.

Ms. KING. Yes, and I am also unaware of any paid, other than travel expenses, obviously.

The CHAIRMAN. I think that is probably it.

But my larger point is that many of these peer reviewers go from the college that they are teaching in and they go to review another college. As someone described to me, it is kind of an incestuous relationship. These professors all know one another,

“You scratch my back, I will scratch yours. I am not going to give you a bad report, and when you come around, you do not give me a bad report.”

Now people will say, “Well, that does not happen. That does not happen in higher education.” Well, I am not so certain. If it does not happen overtly; it happens just, well, you know, “We will take care of that.” Now, there is training for peer reviewers. I am not certain what kind of training that is. We will get into that, perhaps.

But what I wanted to get into more than anything is what the accreditors, the regional accreditors are doing in terms of sending a message out to the institutions that they are accrediting? The Higher Learning Commission of North Central Association, the Nation's largest regional accreditor, updated its required criteria to merit or reaffirm accreditation this year and includes the following statement,

“The institution's educational responsibilities take primacy over other purposes such as generating financial returns for investors, contributing to a related or parent organization, or supporting external interests.”

Sylvia Manning, who testified before this committee, who is the president of the Higher Learning Commission, stated they felt it was important to make a statement that education is a public good.

I guess I might direct this question more to Dr. Wolff, but then, we will go onto others, giving your previous work at the Western Association of Schools and Colleges, and your knowledge of the accreditation system.

Do you think that other regional accreditors should adopt a similar type of criteria?

Mr. WOLFF. Yes, Senator, I can tell you that in the WASC standards, we exactly say the same thing. We have added contribution

to the public interest as our standard, into our standard on mission. We saw that that statement was in the Higher Learning Commission.

I do know that all of the other regional associations do look at the issue, whether they are as explicit as HLC has been. This is an issue that we are educational accreditors. We are not there to protect shareholders or the like, and all of us operate with the principle that the primary purpose for our accreditation is to assure that the educational program is dominant or is the primary focus of the institution.

In a specific case, for example, I can tell you, we will not or do not say that a profit level is excessive or a surplus level for a non-profit institution. But we do focus on: are adequate resources being placed on the educational program? And we have had no hesitation in saying to either a nonprofit or a for-profit institution, "inadequate support," particularly to address retention and learning outcomes assessment in two key areas.

The CHAIRMAN. Dr. Levine.

Mr. LEVINE. I think there is enormous variation among the regionals.

I think it is not uncommon to see nontraditional institutions shop around for the best possible deal, the easiest accreditation. I think that low-end is sometimes too low. Institutions get the benefit of the doubt because they become so high stakes. If their accreditation is taken away, they have just lost Federal financial aid so that they are more likely to be given double secret probation than they are to lose their accreditation.

At the high-end, the most selective institutions in the country, it is an expensive, time-consuming, cookie-cutter approach that tends to provide very little information because you know you are going to get accredited. You just have to go through this procedure.

The CHAIRMAN. I do not know if the other two wanted to comment on that. My point is what Sylvia Manning has said that the institutions' educational responsibilities take primacy over other purposes such as generating financial returns, contributing to related or parent organizations, or supporting external interests.

Is that a good focus even for community colleges?

Mr. PHELAN. Absolutely, I agree, Senator. Being in the Higher Learning Commission regional area, I am fully supportive of that.

In fact, as an AQIP institution, the first criterion for me under AQIP is helping students learn; that is our primary focus. Everything else is a distraction. To the degree we do that or do that poorly determines our fate.

So to the degree that we engage in this process of peers with a professional ethic to do a good, quality job regardless of the institution that they visit, and provide a substantial report that the president, the chief academic officer of the board of trustees use to define direction for that institution, vis-à-vis our strategic plan, is how we use this information. We take it very seriously and it helps to advance our institution.

Can we improve some of that effort? Could we provide additional training for the consultant evaluators? Sure. Would that help? Could we create a certification process around some particular standard so that we make sure that every consultant evaluator

showing up is bringing their best A-game to the table. Sure, that would address the question that you raised earlier.

So we can make some improvements, but I would say, make no mistake at least for my perspective being in the Higher Learning Commission and as a president, I and my faculty and board of trustees take it very seriously, and we take those as actionable items.

Coming back, the consultant evaluators really have two roles. One is to ensure compliance and focus on mission and achievement of the criterion. But the second is they are also consultants. They offer advice and counsel, "Have you heard about this? Have you seen this? We did this at our institution. You might want to think about it." And we benefit from that just as much in advancing the institution as well as ensuring compliance of what we are doing.

Ms. KING. And very quickly, Mr. Chairman, I know you want to move on, but from the specialized perspective, peer-review means something slightly different than it may mean in institutional, and that is not my area of expertise.

But our peers are not only educator peers, but on every site visit team and on our decisionmaking bodies, we have practitioners. So if it is dentistry, they have practicing dentists or in public health, we have practicing people in public health and they are also peer reviewers. They are not scratching anybody's back except for the primacy of what we take into account as protection of the health and safety of the public, protection of the public interest and that is primary in every council discussion that I have ever been a part of. And I would guess that my colleagues in specialized accrediting would tell you the same thing.

The CHAIRMAN. Thank you all very much.

Senator Alexander.

Senator ALEXANDER. Ms. King, do you think it would be appropriate for a specialized accrediting agency to come around and say, "Your building is old. We think you need to spend \$40 million building a new building or we are not going to accredit you?"

Ms. KING. That is a great question.

Senator ALEXANDER. I know it is. Why do you not give me an answer?

Ms. KING. I am not exactly sure.

Senator ALEXANDER. What does that have to do—

Ms. KING. I do not know, actually. Let me—

Senator ALEXANDER. Yes. Well, that is what happened at the University of Tennessee. I was president, and the legal accreditors came around and said, "If you do not build a new law school building, we will not accredit you." I about threw them out of the office.

Ms. KING. I do not—

Senator ALEXANDER. But we had to do it.

Ms. KING [continuing]. Blame you.

Senator ALEXANDER. What?

Ms. KING. I do not blame you.

Senator ALEXANDER. Well, is that not an example?

The point I am trying to get to, it seems to me that accreditation is not a perfect fit for what the Federal Government needs done. I mean, what the Federal Government needs done is to know whether we are throwing our money away, right? Then what ac-

creditation is supposed to do is, if I am right and please correct me, it is really a self-regulating device. If you are at Jackson, Dr. Phelan, what you want your peer reviewers to tell you is how can I be better, right?

Now what we want them to tell us is, are you a fraudulent institution and we should not be allowing students to spend taxpayers' money at your place. And those are not necessarily the same inquiries. Is that not right?

Mr. PHELAN. I would say so. I think there are two parts to your question. The first, I would say, I do think your experience in Tennessee was an overreach, from my perspective.

Senator ALEXANDER. Yes.

Mr. PHELAN. I think those decisions are best made by your local board of trustees by evaluating your financial situation.

Senator ALEXANDER. Yes.

Mr. PHELAN. The realm of the accreditor, in your particular case, is understanding the quality of the learning environment. Is the place too noisy? Is it too hot?

Senator ALEXANDER. Do your accreditors come in and tell you, examine the size of your administrative staff?

Mr. PHELAN. Yes.

Senator ALEXANDER. Whether your buildings are new or old, do they look at that?

Mr. PHELAN. Yes, they do, but that would be an overreach—

Senator ALEXANDER. Do you think they should?

Mr. PHELAN. That would be an overreach for them to proscribe what that needs to be. What their focus is, is what is the quality of education taking place in your institution? Is there a formative procedure by which that education is developed, curriculum, outcomes, those are developed and making sure that is in place. Saying you have too many provosts or vice provosts should not be their domain.

Senator ALEXANDER. Yes.

Mr. PHELAN. So to the point there, I think it is important to say that there is a role and responsibility for accreditors to have some say in understanding what is the quality of the learning environment? What is the academic approval process?

Ultimately, they also need to be on the hook to be able to say, "You are not meeting these minimal standards in order to have the outcomes that your students should have."

Senator ALEXANDER. Let me be a little blunt about it. I do not want to put words into Senator Harkin's mouth, but we have a lot of institutions. There is a good deal of concern on the committee that some of the nontraditional institutions are institutions where taxpayers' money is being wasted. And so Senator Harkin had a whole series of hearings a couple of years ago on for-profit institutions. He was concerned about those. My own preference is to look at all of the institutions, 6,000 or 7,000 and treat them the same way.

I think it is a fair point to say is there a way accrediting agencies can help assure the Federal Government that there is at least some minimum below which—there is a group of institutions that should not be accredited where students with taxpayers' dollars should not go? I mean, that is much less of an examination, it would seem to

me than this larger examination of: how do we improve all of the departments at Yale University? Which as, you say Dr. Levine, is going to get accredited.

The whole purpose of it is to help the university itself improve itself, right? It is not to find out whether it is a waste of taxpayers' money for someone with a Pell grant to go there.

How do we separate those two things or is it possible to do?

Mr. LEVINE. Sure, it is possible to do.

By the way, you brought back some horrible memories. I was a college president for 12 years' of visits. I knew specialized accrediting was sort of like bringing in the lobby. The question was how many new positions they were going to ask for. The question was how many new fellowships they were going to ask for. It was just a question of how much this visit was going to cost me in terms of add-ons to what I was doing, so I never loved specialized accrediting visits.

In terms of your question, the reality is, yes. Accrediting does much more than what the Federal Government is looking for and there are three alternatives here. One is turn to somebody else, create something else. The other one is, you have a choice of which organizations you recognize, and there are some that you may not want to recognize that are currently recognized now.

Senator ALEXANDER. You mean that the Secretary should recognize.

Mr. LEVINE. Yes.

Senator ALEXANDER. I was pretty far along in my time as Secretary before I realized that I could basically accredit the accreditors.

Mr. LEVINE. That is it and there is probably some stuff that ought to be done there. And finally, I think it is useful at this point. Everything is in flux in terms of where higher education is going. These are wonderful times to sit down with the accrediting associations and figure out what constitutes the appropriate floor for now. What should it look like? And it sure should not look like what it used to.

Senator ALEXANDER. The floor? What do you mean?

Mr. LEVINE. Yes. The basic, "Does this institution pass muster? Is it adequate?"

Senator ALEXANDER. So it is not unreasonable to say there should be at least a basic level.

Mr. LEVINE. Absolutely.

Senator ALEXANDER. And then above that, it is all about shooting for the stars for that institution.

Mr. LEVINE. Yes, sure. And you are buying a piece of the package.

Senator ALEXANDER. Yes. And my instinct is, I think I hear Dr. Wolff saying this especially, maybe all of you, that as far as innovation goes my instinct—and tell me if I am wrong—is that one way that we could allow accreditors to have more time to spend on figuring out what to do about all this innovation that we hope is going to be happening, is to relieve them from requirements of doing things that are less useful. Is that correct?

Mr. WOLFF. Senator, first, very good question, and as a former law professor having taught in a building that was new as a result of a recommendation of the agency, I can appreciate the concern.

Senator ALEXANDER. You might have been on that visiting accreditation committee or that peer-review committee, yes.

[Laughter.]

Mr. WOLFF. I do mean to say that speaking for regional accreditation, there has been, I think, a very significant and substantive shift from inputs and resources that you describe, to outcomes and a focus on outcomes that the president has described.

An example is we used to pay attention to how many volumes staff in a library. We do not even look at that anymore. We want to look at how are students accessing information, online or other ways, and information literacy? This is a shift that is quite dramatic, and it is one that is a culture shift as much as a reframing of standards. It is underway and needs to be moved farther along.

Second, I would also say that I share the concerns that you all are expressing, and I think my colleagues do, about how do we describe what floor is, given the diversity of institutions? We do need to, and this is why I have talked about, on the one hand, more attention to public accountability and more risk-based accreditation to deal with both the top and the bottom within a system.

I also believe there ought to be triggers that call for more monitoring, but not immediate action or not a specific action. Let me cite an example.

My commission, 2 years ago, adopted a requirement that all institutions would report on retention and graduation for all students, transfer students, non-full-time freshmen, the data that is beyond IPEDS, do a 3-year trend analysis, disaggregate the data, and find at least three benchmark institutions that would be, one of which at least, would be stretched.

We have now run that in a pilot, where they are discovering the challenge of, No. 1, getting good data; No. 2, defining what is an appropriate level; and No. 3, getting good comparative data. But we are staying on the course and trying to work this out in a responsible way.

But I do think we need to be more transparent and more focused on issues like debt, completion, demonstration of clarity of the outcomes, and the quality of the representations that institutions are making, what I would call part of that public accountability agenda, while we are also looking at more holistic aspects like governance and other things.

I do believe that we are much more attentive to the floor. We are sanctioning more. Our standards are being higher, if you will. We are paying a lot more attention to entrepreneurial institutions and the front door issues of recruitment, financial aid, and the like.

I think transparency, a lot of it is not public, it is not known, so I would urge that we have the conversation that Dr. Levine is talking about: what more can we do? How can we do it?

I am not sure more regulation is the answer. Actually, I would say more regulation is not the answer, but more collaboration with the Department where it is seeing problems because it has investigatory authority. It is collecting data more holistically. It is doing the calculated financial ratio indicators, and we do work with them



when they notify us of that, but I would hope we could improve the collaboration between us.

Senator ALEXANDER. I would just say to Chairman Harkin, my experience is that the peer-review system is a pretty good way to do it. Academic people are independent, let us say, and when they arrive on your campus to examine you, they are not necessarily going to give you a pass. They are skeptics by profession, really, I mean most of them are skeptics by profession and they examine things that way, and most of them do not get paid very much. I mean, they get their expenses paid generally, is that not right, for their visits.

It is sort of a professional duty, from my experience, and they come in with a pretty aggressive way usually, and take some delight in catching somebody on another campus not doing something quite as well as they do on their own campus. So it is more likely, actually, to be more adversarial than it is too congenial. Now, that is awfully anecdotal.

But, I do not know what the alternative is. The only other thing to do is just hire a bunch of regulators, and put them in the Department of Education, and travel around and see 7,000 institutions, and that would be a disaster. They would not have a clue about what they were seeing.

What you have to do is you have people who, at least, are familiar with all these various facets of higher education so they can contest and examine each other. So it would be kind of like the University of Tennessee coming to examine Iowa State. We would probably think we were doing it better than you did, and you would know that would be wrong because you have the best land grant university in the United States. There would be a lot of competition about that.

The CHAIRMAN. I just do not know. I have not really studied how peer reviewers get to be peer reviewers, and how long do—I assume there is some kind of training that goes on? And are they trained well? And if you become a peer reviewer, do you stay there and do that year after year after year after year for a long period of time? I do not know the answers to those questions.

Mr. Phelan.

Mr. PHELAN. I can speak to that, Senator. As a consultant evaluator myself, there is a responsibility that you have before you can consider that, in fact, you have been involved in accreditation process, that you have been attending regularly the annual meetings of accreditation. There are specific training programs. The associations also look to make sure you are getting continuing professional development.

I would also let you know that at the conclusion of the site visit, there is an inter-rater kind of reliability test that goes on. So the chair of the committee evaluates each to the members of the team. The team, in turn, rates back the chair about the quality of their work. The president of the institution also has the right and responsibility to lead back to the higher education accrediting body and say, "We had a good experience. We had a bad experience. The individuals were not prepared. They were prepared." So there is a system of accountability and checks and balances on that.

Can it be improved? I think so. I think that maybe the certification process, as I mentioned previously, could help define that a little more tightly, but there are current systems in place that preclude difficulty in that area.

The CHAIRMAN. Well, since we are talking about the internal operations of these agencies. Dr. Levine, the testimony you provided and I read, on the end of it, you talked about, "The work recently done to reform teacher education," and you mentioned that in your comments also, "accreditation by the Council for the Accreditation of Educator Preparation," and you used that as an example of how they reform themselves from within.

First, what was the impetus for that change? And could regional accreditors also kind of engage in that kind of self-reflection and self-improvement?

Mr. LEVINE. There is no reason why they could not.

I must say one other thing, and using them as an example. I have been really, really critical of teacher education accreditation before they made the changes. And one of the reasons they did make the changes was everybody was really critical of teacher education accreditation. And when the two agencies merged, the idea was this was pretty much their last chance to get it right or they were risking being replaced by other kinds of organizations. So the incredible pressure really did cause them to make major changes that were very desirable. Strong leadership was also very important in making this happen.

Could other associations do this? Absolutely. They absolutely could.

The CHAIRMAN. Oh, yes. Dr. Wolff.

Mr. WOLFF. Just very quickly. When we undertook our last review, we actually had nine people prepare papers including Dr. Levine, Kevin Carey, a whole range of people about where accreditation needed to go to the future.

We also did another series of papers on how accreditation needs to change to respond to innovation, nine papers. They are all on our Web site. And we took a lot of those ideas, worked with the commission, did surveys.

Every accrediting region is required both, by their own practice and by law, to update their standards periodically. But I think that we are at a time, as I am trying to indicate, we are at time where we need to have multiple approaches. We need to be able to demonstrate much more flexibility and much more sensitivity to the issues that you are raising.

I think that we are up to the task and are prepared to engage in that kind of dialog with you.

The CHAIRMAN. I just want to be fair about one thing, going back to Senator Franken's comment, and I mentioned that there were 4 schools that were terminated in regional accreditation and 13 schools in national, but that is sort of the extreme.

There are a lot of other instances. There is "accreditation continued following comprehensive review which required followups", "notices or warnings", "probation"; "show cause", I do not know what that means, and "other", 365 instances of "other" for regional accreditation, 257 for national accreditation.

When you total up out of that, then there is a lot more that is going on other than just termination or removal, and I am not certain I know exactly what all those are and what those entail. So my previous question was sort of, "Well, is the floor too low?" Well, I do not know. I guess it would be, "Is the floor too low for termination or removal, but how about these other stages? Do they have appropriate floors?" For example, for whatever it means here when there is a notice or a warning. I do not know what that means, but there are substantially more of those than obviously termination of accreditation.

In your own estimation, should there be other things, other than the list I have here, which I think is an exhaustive list from the CRS, Congressional Research Service. Are there other things that should be looked at or should be, what am I trying to think of, a stick, as someone said earlier, rather than just these? Are there other things that are not being looked at that should be looked at?

Mr. WOLFF. First, let me say the things that you cite are what we would call sanctions, and all sanctions are public. So the first thing is to say that they are public on our Web site. They are not necessarily, unless it is show cause or something, extremely serious. Are the institutions required to identify their status with respect to regional accreditation?

Second, Federal law limits the period of time in which an institution can demonstrate its compliance when it is out of compliance with a standard to 2 years. We all adhere to that 2-year rule and though it is not staged warning probation show cause over a decade, it is now very serious and taken very seriously by institutions.

And whether it is a warning, probation, or show of cause, which are designed to communicate levels of seriousness, in our experience, that followup monitoring leads to dramatic institutional change, change in leadership, dramatic efforts, which is why I think we could cite dozens of turnaround stories where there has been success as a result of all of those categories.

The CHAIRMAN. One thing that leaps out at me, I do not mean to go on too long here, but "show cause", which I do not even know what that means, under the regional agencies there were 6 instances, but under the national agencies there were 580. All the rest of them are sort of aligned, but that one seems to be way out of whack. Why the difference in those two?

Mr. WOLFF. The one thing I would say is that terms do not mean the same things even across these six or seven regional accrediting commissions.

So WASC uses show cause to mean, "You are going to lose your accreditation in 1 year or less." There is another agency that uses show cause to say, "You have to show cause why you were not put on probation."

So the first response is with respect to the regional community, there is a conversation going on about how do we make our labels consistent so that they do not confuse?

With respect to the nationals, I cannot answer. I do not know how show cause is used in their context.

Ms. KING. And there is a similar effort at the specialized level because all of those items that you mentioned do mean different things for different agencies, although they are all part of sanc-

tioned status of some sort. And so there are among specialized accreditors, an effort to try to make those more consistent, to be more transparent to the public.

The CHAIRMAN. Should they be standardized, these terminologies, across accrediting agencies?

Mr. PHELAN. From my perspective, I think that would be helpful particularly as we are in a time where students are matriculating all around the use of the technology, Internet courses, taking classes from different institutions.

As parents and students themselves are looking for the transparency documentation about how this institution has performed, having a common set of definitions and a common set of meaning would be very, very helpful to parents and students themselves in understanding the viability of that particular institution.

So I would say yes, Senator. I would support that.

The CHAIRMAN. Could the agencies themselves sort of collaborate without us?

Mr. PHELAN. Yes, and I think you heard from my colleague here to the right that, in fact, they are having those conversations now.

The CHAIRMAN. OK. Yes.

Mr. LEVINE. Senator, I think the process that we are talking about could be accelerated and there are probably three steps that might be taken.

One is we could spur innovation among accrediting organizations if we used established programs like i3 to Investing In Innovation, to provide some competition to spur modernization on the part of accreditors, raise standards on the part of accreditors, and encourage mergers on the part of accreditors to create common standards.

The second piece would be, I think pressure works very effectively.

The CHAIRMAN. Excuse me. I am sorry.

Mr. LEVINE. No, it is perfectly fine.

The CHAIRMAN. I have one last question I wanted to ask. I recently attended one of the national hearing sessions by the Department of Education on this so-called ratings system that the Administration has proposed. Boy, did I get an earful regarding things that I had not thought about before.

One student, I felt, was exceptionally good. I know Under Secretary Kanter was doing these sessions and it was at the University of Northern Iowa. One student described how these rating systems could actually lead to a death spiral. In other words, if you get a low rating, then you are cutback on your Pell grants and you are cutback on your student loans. That means they really cannot improve themselves. So the next time around, they are down a rung lower. That means they get cut even more. And so everything just keeps going down into a death spiral.

That really impacted my thinking on this. And then a lot of other things on how these ratings systems—so you rate a school, a college, but how about within that college there is one, let us say, professional or one program that is really good and maybe the only one in the area. And students cannot afford to go to another State to go to that program, but that part of that school is really good, but the overall school gets a low rating. And so the kids that want to go to public health school at this university, they get their Pell

grants cut or their student loans curtailed even though that school might be the only place they can go.

I got an earful on that and I am really looking at it. Just speaking for myself, I am really looking at this whole proposed rating system. I hope I did not prejudice your thinking on this, but I am just wondering, have you looked at this proposed type of rating system and how it would be connected with Federal financial aid?

Have you looked at these? Do you have any views on this? Sort of aside from what we are here about, but I am just curious. You are all involved in ratings and accreditation. I just wondered if you have any thoughts on this?

Mr. LEVINE. I have heard two presentations so far on the rating system, and at the moment, it is inchoate.

What I think is really needed is, we need consumer information for students, not a ranking system. Will it be terribly desirable? Tell me about the attrition rate. What are my chances of graduating if I enroll in this institution? Tell me what my student loans are going to look like when I graduate from this institution. Tell me about my placement rates when I graduate from this institution. That would be terribly, terribly helpful consumer information that might do the same job.

The CHAIRMAN. Anybody else have any thoughts?

Mr. Phelan.

Mr. PHELAN. I agree with Dr. Levine. I would also say that I agree with your analysis of the implications for the institutions relative to Federal financial aid.

Senator, the distance between rating and ranking is about that wide. And I am concerned from community colleges that we are actually opposed to that because there is a uniqueness and a diversity of our institutions which are not captured in simply numerical ratings. And we have to consider the changing dynamic of students.

For example, am I going to be held more accountable because I am an institution where 80 percent of my incoming students fail to prepare for a college level class, so they have to take developmental education? As opposed to another institution which is in a very vibrant, suburban, well-heeled financial area? So we have to be very, very careful.

We are in opposition to that for the reasons I have stated.

The CHAIRMAN. Yes, Dr. Wolff. This will be the last round and then we have got to go. But Dr. Wolff, your thoughts.

Mr. WOLFF. I would just concur and add much work needs to be done on it and including accuracy of data.

One of the things we have learned is how difficult it is to get accurate data and the high stakes consequentiality of calling it "ratings," is serious and then performance funding, if you will, with respect to that.

I think what is critically important is that we move toward a more personalized form of education that technology provides. It is not just, "How well will I do with this institution or what are my chances?" It is, "With respect to which program given my GPA and my preparation?" And over-generalization can be misleading in any direction possible for students. It is not just the availability of information; it is being able to contextualize and make that information meaningful.

I think we all need to be more accountable, to be more helpful with respect to this, and including accreditors. I think we all have a role to play. But higher education is far too important, and frankly, it is not for everyone at age 18. And many students only will be able to go in their home communities, and that is where most students go.

The CHAIRMAN. Right.

Mr. WOLFF. We do not want to damage that, but what we want to do is to make it better and more appropriate for those students.

So I would just say the concern is real. We all have a role to play to address it, but we want to do no harm.

The CHAIRMAN. Thank you. Ms. King, did you have one last thought?

Ms. KING. Yes. I agree with my colleagues. I am very concerned about the proposed ranking system and for many of the reasons that Dr. Wolff talked about.

In the programmatic area, it is true that many of our students in my profession go back to school as adults. They do stick with their local communities and, frankly, the difference between a program at a large, private research institution might prepare an exceptional graduate to do those kinds of things related to their mission in public health, but also somebody who goes to a very small, State, locally focused university would do an amazing, wonderful job in the local community, and that is just as important in public health. I would hate to see that kind of system unfairly penalize those students who do that.

The other thing that concerns me is the accuracy of data. The Department of Education currently has a database, and I included this in my written testimony, but currently has a database just to identify accredited or not accredited programs. It is consistently inaccurate, out of date. It does not capture the variety of what we do. It is not a good resource for students. We have talked to them about this multiple times and said, "Please, link to the accurate information. It exists on our Web site."

I am very concerned if they cannot even get accredited status accurate for the public, how is it going to be with the kinds of really high stakes data that we are talking about for a rating system? That is my concern.

The CHAIRMAN. Thank you all very much.

Senator ALEXANDER. You did not ask my opinion, but I agree with them.

[Laughter.]

See, I think that would be a big miss. That kind of reminds me of all these groups around town that rank whether you are a good Republican or not. They pick the 20 votes they like and then they give you a 51, and boy, another group will give you a 95.

Some useful points have been made, though. I think Dr. Levine's point, I think he is right. Probably the Department ought to sit down with the accreditors and say, "What are the questions that a student should ask if they want to go to this type of institution?" And then, "Where in the Web world is that accurate information available so we can link them onto it?" rather than the Department itself doing it.

The Department does not have the capacity to do stuff like that. I mean, they are well-meaning people, but they just cannot do that. So, that would be a good thing to do. The other thing we should do is go through all the things that the universities are already required to report and get rid of all the stuff that is not what we just said because they already have a mountain of things that they have to report.

My impression is that it just goes into the Department of Education and disappears into an inadequate data collection system that is of very little value and there is no one really to see it.

So let us get rid of all of that. Ask the accrediting agencies what should be asked, let the Department link to that, and then the Department could have a pretty good sort of national report card that students and parents could go to and find out the 10 best questions they ought to ask if they want to go to this school of nursing, or this law school, or to this community college. That could be a help. But the idea of the Federal Department of Education ranking colleges and universities would be way beyond the capacity of any sort of national school board, in my view.

The CHAIRMAN. With that we call the hearing to a close.

I want to thank all our witnesses for sharing your expertise and views. Again, improving the structure of accreditation and ensuring academic integrity is a key priority for this committee as we reauthorize the Higher Education Act.

I thank all my colleagues. I especially want to thank Senator Alexander for his partnership on this hearing on the committee's efforts to examine issues critical to this reauthorization.

I request the record remain open until January 2, 2014 for members to submit statements and additional questions for the record.

I hope I can also ask all of our witnesses that we can reach out to you one way or the other, on our staff level or member level, as we move ahead in the next year's reauthorization. I would appreciate that very much. Thank you all for being here today.

The committee will stand adjourned.

[Additional material follows.]

## ADDITIONAL MATERIAL

### TALKING POINTS FROM SENATOR ALEXANDER

- Mr. Chairman, thank you for agreeing to hold this hearing on the important topic of accreditation.
- Accreditation has been a topic of growing concern on both sides of the aisle.
- In most countries in the world, the function of accreditation, or quality assurance, is carried out by a government agency, such as a ministry of education; however, here in the United States, we rely on independent, non-profit organizations to determine quality.
- We should bear in mind that this approach has helped produce a higher education system that has not just some of the best colleges and universities in the world, but almost all of them.
- As we look forward to the reauthorization of the Higher Education Act, it is instructive to look backward to the origins of accreditation, which has evolved in phases.

#### PHASE I

- The first accrediting agencies emerged more than 120 years ago, in the last decades of the 19th Century.
- Much like today, higher education at that time was in a state of flux.
  - Some colleges had abandoned the classical curriculum and were adopting something known as the elective system.
  - New types of institutions were emerging, including normal schools to prepare teachers, technical schools, and junior colleges.
  - Enrollment in both high school and college was increasing rapidly, often with no clear distinction between the two.
- With no commonly accepted standards for getting admitted to a college or for completing a college degree, people started to ask: “What is a college?”
- So, in 1885, a group of colleges and high schools in New England formed a voluntary association to answer that question by agreeing on common admissions criteria and standards of academic quality.
  - Within 10 years, three more regional accrediting associations emerged covering most of the United States (except the Pacific Coast and a few mountain States).
  - It made sense that these new accreditors were organized regionally, since very few students attended schools far from where they grew up and travel costs made nationwide collaboration difficult.
  - At the turn of the 20th century, fewer than 13 percent of Americans were completing high school and less than 3 percent were completing with college degrees.
  - In the following decades, accreditors worked to promote higher and more specific standards for both admissions and academic quality.
  - Colleges and universities participated on a voluntary basis, subjecting themselves to critical review by their peers as a means of quality improvement.
  - There was no Federal involvement in or oversight of accreditation whatsoever.
  - In 1944, Congress passed the G.I. bill, which included Federal financial assistance to help any veteran who served at least 90 days between December 1941 and 1946 pay for college or vocational training programs at the public or private institution of their choice. This included even high schools.
  - The only limitation on choice of institution was that it had to be approved by the appropriate State educational agency or by the Administrator of the Veterans Administration.
  - The number of Americans enrolled in college more than doubled in just 6 years between 1943 and 1949.
- According to the U.S. Department of Education:
  - In 1943, nearly 1.2 million were enrolled in college (6.8 percent of 18–24 year-old population)
  - By 1949, more than 2.4 million were enrolled in college (15.2 percent of 18–24 year-old population)

#### PHASE II

- Federal involvement in accreditation changed in 1952, when the Korean G.I. bill specified that institutions of higher education needed to be accredited by a federally recognized accreditor in order for a veteran student to use their benefits.
- By this time, roughly 35 percent of students were graduating from high school and 6 percent were completing college.



- This step was understandable, as the 1944 G.I. bill had led to some fraud and abuse, suggesting that relying on State approval of a higher education institution to operate was at that time not enough to ensure that Federal funds would be used at quality institutions.
- Most accreditors welcomed the change, as it gave them official standing and recognition they had previously lacked.
- This was reinforced in the 1965 Higher Education Act, by requiring that students receiving any Federal student aid could only use those funds at institutions accredited by a federally recognized accreditor.
- Tying eligibility to receive Federal aid to accreditation opened the accreditation process up to Federal regulation—the government had to decide what should constitute a federally recognized accreditor.
- Regulation of accreditation increased gradually, especially after the 1965 Higher Education Act, but the law remained silent on what accreditors needed to focus on in determining quality.
- Between 1952 and 1965, college enrollment increased from more than 2.1 million to nearly 6 million (almost 30 percent of the 18–24-year-old population).

## PHASE III

- In the 1992 reauthorization of the Higher Education Act, Congress took a big step by, for the first time, defining in law the areas accreditors needed to examine when determining institutional quality in order to maintain Federal approval.
- By then, about 80 percent of Americans completed high school and about 21 percent completed college.
- This language was modified and expanded in both the 1998 and 2008 reauthorizations.
- In 1952, only one reference in law and 1 page of sub-regulatory guidance was sufficient to define what an accreditor needed to do to gain Federal recognition.
- Today, accreditors are burdened with:
  - 10 pages of law;
  - 28 pages of regulation; and
  - 88 pages of sub-regulatory guidance.
- There are now 93 different criteria that accreditors must consider when determining institutional quality.
- It seems to me that the Federal Government has become too intrusive through the law and regulation, distorting the true focus of accreditation—quality and quality improvement.
- Are we asking accreditors to review quality when we ask them to determine:
  - Whether they have written plans to maintain and upgrade facilities, equipment, and supplies?
  - Whether their budget allocate resources for facilities, equipment and supplies?
  - Whether their facilities and equipment meet State and local safety and fire codes?
  - Whether they have adequate administrative staff?
- We even ask them to determine if an institution is in compliance with Title IV, which should be the Federal Government's role.
- Accreditation has become too complicated, leading to costly and lengthy reviews, and delving into areas in which accreditors have no expertise.
- In 2007, I fought against attempts by the Department of Education to further federalize the accreditation process by implementing recommendations from the Spellings Commission that would have told accreditors exactly how to measure student learning.
- I argued that the Department's approach would "restrict autonomy, choice, and competition"—the very forces that have helped produce the best higher education system in the world.
- No Child Left Behind has resulted in what amounts to a national school board for our elementary and high schools—the last thing we need is to take the same approach in higher education.
- We in Congress have a duty to make certain that the billions we give to students to attend the colleges or universities of their choice are spent wisely.
- But, we need to do so in a way that preserves the autonomy that has made our colleges and universities the envy of the world.
- Mr. Chairman, it seems to me that this is a perfect opportunity to step back and start from scratch.

- When we hear concerns raised about accreditation, we need to ask whether we in Washington are part of the problem.
- Vanderbilt University estimates that its College of Arts and Sciences devotes more than 5,000 hours to accreditation-related work every year and that its School of Engineering devotes up to 8,000 hours of work every year on accreditation.
- The University of Michigan reports spending over \$1 million in accreditation-related costs.
- I look forward to today's hearing as an opportunity to further discuss the role of accreditation.
- In doing so, I think we need to ask a few simple questions:
  - What is the central purpose of accreditation?
    - Is it to ensure quality?
    - Are accreditors fulfilling that role?
  - What is the Federal Government's role in accreditation, if any?
  - Has the Federal Government overstepped to the point that accreditors are not doing what they were designed to do?

[Whereupon, at 12:45 p.m., the hearing was adjourned.]

