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Putting Students and Taxpayers First

An Outcomes-Driven Portfolio Approach to Accreditation

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Introduction

At a time when bipartisan agreements are exceedingly rare, accreditation stands out as an exception: across the political spectrum there's widespread consensus that the accreditation system should shift its focus on student outcomes. As the gatekeeper to over \$150 billion annually in federal student aid,¹ accreditation plays a critical role in protecting students and taxpayers by assuring the quality of our postsecondary educational system. But the past 15 years have been marked by a growing, bipartisan concern about quality assurance, and questions about accreditors' role in a shifting landscape.² Calls for reform from policymakers, researchers and advocates have been mounting, fueled by persistent challenges facing our higher education system, such as low graduation rates and inadequate quality of student learning, as well as high-profile events, such as the abrupt collapse of national for-profit college chains Corinthian Colleges and ITT Technical Institute.

Despite the consensus diagnosis that accreditors can improve their performance in meeting their key responsibility to prevent underperforming and predatory colleges from tapping federal funds, and the need for them to focus more on how students fare at the colleges they oversee, agreement on the policy remedy remains elusive. This paper provides an overview of the current landscape and recent developments, and recommends policy changes for achieving the shared goal of improving the effectiveness of accreditation by putting student interests at the center of reform. We believe that an outcomes-focused, performance-driven and results-based portfolio approach to strengthening quality assurance will enhance accountability in higher education and help restore public confidence in the accreditation system.

How We Got Here – A Brief Historical Overview

Although the first accrediting agency was formed in 1895,³ it was not until 1952 that accreditation took on a gatekeeping role for the federal government. Following rampant fraud and abuse of the original GI Bill by low-quality and “fly-by-night” colleges taking advantage of veterans,⁴ the 1952

Korean GI Bill included accreditation as an institutional eligibility requirement and required the Commissioner of Education to publish a list “of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution.”⁵ Then, in 1965 the first major direct federal investments in expanding postsecondary opportunity for all Americans – the Higher Education Act and the National Vocational Student Loan Insurance Act – similarly limited access to federal funds solely to accredited institutions.⁶

Prompted by “a dramatic increase in loan defaults, and reports of waste, fraud and abuse” in the 1980s, a bipartisan Senate Subcommittee investigation of the federal student loan program began in 1989 and ultimately found that accreditors had “failed to assure that proprietary schools provide the ‘quality of education’ requisite” for participation and concluded that the regulatory triad “provides little or no assurance that schools are educating students efficiently and effectively.”⁷ Among its several recommendations, the subcommittee’s 1991 final report called for the Department of Education “to develop minimum uniform quality assurance standards, with which all recognized accrediting bodies that accredit proprietary schools must comply” and to require accreditors to “develop and make public uniform performance-based consumer protection standards, including, but not limited to, criteria on enrollments, withdrawal rates, completion rates, placement rates, and default rates.”⁸

But the 1991 Senate did more than simply make suggestions to the Department. In addition, the report called on Congress to make “major, and in some areas, drastic reform” of the student aid programs.⁹ Heeding this advice, in the 1992 reauthorization of the Higher Education Act, Congress adopted several improvements to revamp accreditation and strengthen its gatekeeping function, including a new focus on student outcomes. The bipartisan legislation authorized the Department to establish standards for approving accreditors, including, among other things, “an appropriate measure or measures of student achievement,” required accreditors to have standards that assess an institution’s “success

with respect to student achievement in relation to its mission, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates,” as well as default rates and student complaints.¹⁰ By creating the first ever set of federal standards for the review of accreditors by the Department and the review of institutions by accreditors, Congress signaled an important shift in accreditation; however, it proved to be temporary.

By 1998, the deregulation agenda that followed the 1994 elections was in full swing and higher education was no exception. The next HEA reauthorization reversed many of the 1992 changes and the recognition and accreditation standards were amended with respect to default rates. Signaling an overall retreat¹¹, the reauthorization eliminated the requirements for accreditors to assess institutional tuition and fees in relation to subject matter and program objectives, to review program length, and to conduct unannounced site visits to schools providing vocational education and training, and by weakening of the requirement for accreditors to monitor default rates.¹²

The next major push for accreditation reform was spearheaded by a Republican Secretary of Education, Margaret Spellings, a self-described “accountability hawk” who sought to shake up higher education, much like she had done for K-12 education as one of the major architects of the bipartisan 2001 No Child Left Behind Act.¹³ Soon after taking office in 2005, she launched the Commission on the Future of Higher Education, which became known as the Spellings Commission. The Commission’s final and controversial report, published in 2006, focused heavily on the “evidence that the quality of student learning at U.S. colleges and universities is inadequate and, in some cases, declining” and the “remarkable absence of accountability mechanisms to ensure that colleges succeed in educating students,” identified “significant shortcomings” in accreditation and provided recommendations for its “transformation.”¹⁴ Among its highlights, the report argued that accreditors “should make performance outcomes, including completion rates and student learning, the core of their assessment as a priority over inputs or processes” and called for “a framework that aligns and expands existing accreditation standards...to allow comparisons among institutions regarding learning outcomes and other performance measures.” Following the report, Secretary Spellings tried to shift accreditation’s focus on

student learning and other outcomes through regulations, but was fiercely opposed by higher education institutions, which effectively lobbied Congress to stop her efforts.¹⁵

The industry’s pushback efforts bore fruit in the reauthorization of 2008. Capitalizing on the major backlash from the Spellings Commission’s report and the momentum from thwarting new regulations, the higher education lobby successfully pushed for changes to further loosen requirements on accreditors and tie the hands of future administrations. As a result, current law allows accreditors to vary student achievement standards by institutional mission, as well as to vary by institution or program as established by institutions themselves. The law also bars the Secretary from establishing any accreditor recognition criteria related to student achievements standards or regulating on such standards.¹⁶ In other words, the 2008 reauthorization built a firewall between the Department, which is responsible for assessing whether accreditors are reliable authorities as to the quality of the education, and accreditors, with respect to their standards for assessing institutional success regarding student achievement.

Growing (and Bipartisan) Calls for Outcomes-Based Reform – Recent Developments

History has a habit of repeating itself. Just as the skyrocketing student loan defaults and reports of widespread fraud, waste, and abuse during the 1980s led to a Senate investigation in the early 1990s, a growing student debt default rate and mounting reports of unscrupulous colleges after the Great Recession of 2008 led to a Senate investigation and renewed calls for accreditation reform in the early 2010s.

Scathing exposés in the media portrayed accreditation as “a gaping hole in America’s system of consumer protection”¹⁷ and accreditors as the “watchdogs that rarely bite”¹⁸ and documented how “colleges with some of the worst graduation and loan default rates in the U.S. have received glowing reviews.” These stories, coupled with the student loan debt crisis and calls from both sides of the political spectrum to improve quality in postsecondary education, captured Congress’ attention, which held a number of hearings in the following years.

Surprisingly, a consensus on both sides of the aisle seemed to emerge during this period around the need for accreditation to focus less on inputs and more on outputs, and in particular on student outcomes. For example, in 2013 the American Enterprise Institute argued that “evidence of limited student learning, grade inflation, low graduation rates, high dropout rates, and high default rates all point to a failure to ensure quality” and called for performance metrics and accountability thresholds, among other things.¹⁹ In 2014, the Government Accountability Office (GAO) released a report that showed that poor student outcomes did not lead to an increased rate of accreditor sanctions. GAO also raised significant questions about “whether existing accreditor standards are sufficient to ensure the quality of schools, whether Education is effectively determining if these standards ensure educational quality, and whether federal student aid funds are appropriately safeguarded.”²⁰

In 2015, the Chairman of the Senate Committee on Health, Education, Labor, and Pensions, Senator Lamar Alexander (R-TN), himself a former U.S. Secretary of Education, issued a reauthorization white paper on accreditation that laid out improving student success as a key goal of accreditation, questioned whether accreditation focuses enough on outcomes, and suggested reforming and refocusing accreditation to “more critical criteria such as student learning and achievement” to provide accountability.²¹ Similarly, in 2015 the National Advisory Committee on Institutional Quality and Integrity (NACIQI) recommended “a greater emphasis on student achievement and student outcomes.”²² That same year, the Obama Administration announced a set of executive actions to increase transparency and rigor in accreditation with a focus on student outcomes and called for Congress to repeal the 2008 ban on student achievement criteria and to enable the outcome-based differentiated recognition of accreditors based on student outcomes and other risk factors.²³ Legislation introduced in the Senate in 2016 proposed to require the Department to establish standards that accreditors must use when assessing colleges, including student success metrics (retention rate, graduation and payment rate, transfer rate, student earnings after graduation, and job placement rates) and minimum baseline thresholds, among other things.²⁴ Numerous reports and statements since then have all made the same case: accreditation must focus on student outcomes and achievement.

Moreover, in June 2018, the U.S. Department of Education’s Office of the Inspector General released a scathing audit report on the accreditor recognition process, finding that the “process did not provide reasonable assurance that the Department recognized only agencies meeting “Federal recognition criteria” and “identified several weaknesses” in the review process.²⁵ Among other things, the report stated that the Department’s “post-recognition oversight is not adequate to ensure agencies consistently and effectively carry out their responsibilities” and it “does not regularly perform reviews of high-risk agencies during the recognition period.” The report recommended the adoption of a risk-based approach in its recognition and oversight of accreditors, in order to strength the rigor of its processes and mitigate potential harm to students and taxpayers.

Some accreditors themselves are moving toward greater use of outcomes, despite some reticence just a few years ago.²⁶ In 2016, for example, the Council of Regional Accrediting Commissions announced an initiative to review colleges and universities with low graduation rates and pay more attention to loan default and repayment rates.²⁷ However, it is important to note that accreditors have pushed back against what they view as narrow definitions of student success and “inadequate measures of student achievement,” especially when applied across all types of programs, which focus less on learning.²⁸ According to this perspective, accreditors should focus on what, and whether, students learn, not only on whether they graduate, get a job, pay back their loans, or other output-based metrics.

The learning assessment landscape in higher education does not allow for a pragmatic and consistent approach that relies on the wide range of tools and measures of student learning used by institutions. Without common assessments (and thus comparable data), such as a higher education equivalent to those used by states in K-12 education or the National Assessment of Educational Progress, to measure what students learn (instead of whether they graduate, for example, which incidentally is also used in K-12 education), such “broader” measures cannot reliably and readily supplant available outcomes data. Glimpses of student learning in higher education, such as those offered in the 2010 book *Academically Adrift*, are not encouraging.²⁹ For example, the Association of American Colleges & Universities’ 2016 *Trends in Learning Outcomes Assessment* report, found “that many college

graduates are weak on exactly these skills—critical thinking, problem-solving, communication, integrative learning, and the like” and describes “the chronic problem of weak student performance on these essential learning outcomes.”³⁰ Moreover, only about one-third of institutions make their assessment data public.³¹ A recent report also identified serious misalignment between assessment at the program level and institution goals, as well as a very disappointing lack of focus on quantitative reasoning, which has consistently been a key skill employers find lacking in college graduates.³² Finally, a sobering 2014 analysis found that only 18 out of 47 sets of standards for accreditation of undergraduate degrees and programs by 37 accreditors (regional, national and specialized) “made any attempt to deal directly with student learning outcome standards.”³³

Until this landscape improves dramatically, a viable alternative to focus on student learning in order to fulfill accreditation’s integral consumer protection responsibility as a gatekeeper to federal dollars will remain elusive.

A Shift to Student Outcomes – A Portfolio Approach

How can accreditors be more ambitious and rigorous in the effective use of data? If student success should be at the center of quality assurance, then how do we shift to outcomes?

We suggest that accreditors consider a performance-based portfolio approach to institutional accreditation. Drawing from similar management approaches to monitoring performance and assessing risk in other sectors, including K-12 education,³⁴ accreditors should consider employing an outcomes-focused framework in reviewing, monitoring and identifying poor performance and potential trouble spots in their institutional portfolio. Relatedly, the Department of Education should consider such portfolio performance in its review and recognition of accreditors to identify insufficient oversight. Such an approach would focus on results and facilitate continuous improvement in helping students succeed by utilizing existing outcomes data.

Most importantly, it would allow for differentiation across accreditors and promote efficiency and effectiveness in

both the accreditation and recognition processes. Already endorsed by numerous higher education stakeholders, including NACIQI,³⁵ the American Council on Education,³⁶ the Association of American Universities,³⁷ and the Association of Public and Land-grant Universities,³⁸ differentiated or risk-based reviews would target increased scrutiny and resources more frequently on low-performing institutions, while applying less oversight on high-performing institutions. Similarly, the Department could review more intensely and regularly accreditors with low-performing institutional portfolios, and their student achievement standards, while taking a less meticulous approach for accreditors with high-performing portfolios, in its recognition process.

As has been pointed out, most accreditors already collect a significant amount of outcomes data, to varying degrees, although the data are not well connected to specific standards.³⁹ Notably, some national accreditors require program-level data and have performance benchmarks. Moreover, several analyses have established how readily available and easily accessible datasets can be employed to identify poor-performing programs and institutions across a number of student outcomes.⁴⁰ As the Government Accountability Office (GAO) has repeatedly suggested, the Department could and should use its own data on student outcomes to ensure accreditors are doing their job of ensuring that colleges and universities provide a quality education. While the Department has agreed with GAO, it has failed to comply.⁴¹

A good first step in using outcome data to assess accreditors’ portfolio performance has already been taken. Initially as part of the 2015 transparency and rigor initiative, over the past four years the Department has annually published accreditors dashboards, in which it has provided a portrait of respective performance by releasing data on key indicators and outcomes for each accreditor.⁴² Similarly, the 2014 GAO study used a selected set of student outcome characteristics to identify low-performing institutions and then assess whether accreditor sanction was likelier. Both efforts yielded significant insights and demonstrated the plethora of outcome data that could and should be used (see Appendix A for full list of metrics used in the GAO and NACIQI Dashboard). The below table summarizes the outcomes employed in these two efforts:⁴³

| MEASURE | NACIQI DASHBOARD | GAO MODEL |
|------------------------------|------------------|-----------|
| Cohort Default Rate | X | X |
| Forbearance Rate | | X |
| Graduation Rate | | X |
| Dropout Rate | | X |
| Completion + Transfer Rate | X | |
| Retention Rate | | X |
| Median Earnings | X | |
| Median Debt of Completers | X | |
| Federal Student Aid | X | X |
| Program Review Findings | | X |
| Heightened Cash Monitoring 2 | X | |
| Net Price | X | |
| Percent Pell | X | |
| Percent Borrowing | X | |

However, the consensus on shifting to outcomes seems to unravel when it comes to choosing which outcome data to use. A review of the literature points to some metrics that enjoy broad support, are readily available, enjoy a high degree of accuracy and reliability, and help answer key questions regarding student success that both policymakers and the public are asking:

| QUESTION | DATA |
|---|-------------------------------|
| Do students drop out of their studies? | Retention/Persistence Rate |
| Do students complete their studies? | Graduation/Completion Rate |
| Do students repay their student loan debt? | Cohort Default/Loan Repayment |
| Does the labor market reward students' credentials? | Median Earnings |

Dropping out of college is a key risk factor for failing to complete a credential and defaulting. Similarly, dropping out is an indicator of poor academic quality and/or the recruitment and admission of students an institution is unable to educate successfully. The graduation/completion metric is arguably the most basic and common-sense indicator of

student achievement, and even regional accreditors have now endorsed it as a major risk factor that warrants their attention. The student debt metric is the only universal federal accountability requirement in the law (cohort default rate) and reflects both Congressional interest and intent, as well as serves a reasonable proxy for relative value (cost vs. outcomes), while repayment becomes increasingly more accurate due to the expansion of income-based repayment and institutional manipulation and distortion of default rates. Finally, the earnings metric captures the economic benefits of a credential, captures job placement, and is the only widely available proxy for measuring whether the demand side of the labor market (employers) values the credentials awarded by an institution.

These four core metrics – retention, graduation, student debt repayment and earnings – provide a basic set of outcomes data that should be universally applied across all institutions and accreditors, but are by no means the only data that should be used. Using multiple measures helps prevent gaming of standards and provides multiple perspectives on performance. We recommend that all accreditors establish key thresholds to guide institutional monitoring and identification of low performers, regardless of mission and that the Department assess such thresholds and overall portfolio performance on these metrics in its recognition process.

The regional accreditors' 2016 announcement that they will focus on 4-year institutions with graduation rates below 25% and 2-year institutions below 15% is a welcome development, albeit it filled with caveats.⁴⁴ The fact that 4 out of 10 students who enroll in *any* college do not graduate within 6 years,⁴⁵ more than 2 out 10 borrowers default on their student loans within four years after leaving school,⁴⁶ and 6 out of 10 non-completers fail to pay down at least one dollar of their loan principal after five years,⁴⁷ indicates widespread quality control challenges.

For example, let's take a look at a troubled national accreditor, the Accrediting Council of Independent Colleges and Schools (ACICS) that fully accredited the now-defunct for-profit giants Corinthian Colleges and ITT Technical Institute, which collapsed after defrauding students and taxpayers, leaving hundreds of thousands of students stranded with debt and no degrees. ACICS lost its recognition in 2016 after the Obama administration found 21 violations of recognition criteria, but in the fall of 2018, Secretary DeVos

fully reinstated it.⁴⁸ A recent analysis found that 70 percent of students from 100 ACICS-accredited institutions earn no more than a high school graduate, almost 80 percent have either defaulted or cannot repay their student loan debt, and overall students experience worse outcomes compared to both ACICS students in 2016 and current students attending similar institutions. In other words, there are red flags everywhere. Under our proposed approach, such a portfolio performance of results would lead to immediate review and drastic intervention, both for the accredited institutions by ACICS and for ACICS by the Department.⁴⁹

However, in order to capture a fuller picture of institutional performance, accreditors should also utilize several other risk metrics, focused on student success/quality and on financial risk, that will help them develop richer and more nuanced assessments of their portfolio performance, including:

| Student Success/Quality | Financial Risk |
|--|--|
| Retention/Dropout Rate | Federal Student Aid Volume Shifts |
| Forbearance Rate | ED Program Review Findings |
| Median Debt of Completers | ED Sanctions ⁵⁰ |
| Earnings > Median High School Graduate | Heightened Cash Monitoring (1+2) |
| Net Tuition Revenue vs. Instructional Expenditures (per FTE) | Financial Responsibility Composite Score |
| | 90/10 Revenue Percentage |

National and specialized accreditors should also use additional outcomes data they already collect, including job placement and licensure pass rates. All of the above data are publicly available for accreditors to analyze regularly to identify problems, track trends, monitor improvement, and guide quality assurance efforts. Moreover, much of this outcomes data already is, or can be easily, disaggregated by income, race and gender, and thus can unmask student achievement gaps and institutional inequity, which accreditors and the Department should be particularly concerned about if higher education institutions are to truly serve as engines of social mobility rather than as engines of inequality.

Another critically important outcomes data source for public institutions, which educate 3 out of 4 college students, can be found in the massive datasets they already report and which states use to hold them accountable. As of last year, 41 states were involved in outcome- or performance-based funding: 30 states had such policies, 6 states had created policies but not yet implemented them, and 5 states were designing such policies.⁵¹ These systems generate enormous and rich outcomes data, including graduation and retention rates, degrees awarded, labor market outcomes, and a wide variety of information that accreditors can use to improve their quality assurance activities. In summary, a results-focused portfolio approach to accreditation and recognition can help identify lagging performance, better target differentiated interventions, and overall drive the continuous improvement accreditation aspires to and students and taxpayers demand and deserve.

Looking Forward - Policy Recommendations

The previous discussion begs the question: if the shift to outcomes is recognized as key for improving accreditation effectiveness and outcomes data are available, then what policies are needed to make this happen? In this section we provide a menu of recommendations, with and without legislative changes, to advance a results-focused portfolio approach.

Absent legislative changes, we recommend that:

- ▶ Accreditors should examine and consider outcomes data, including the NACIQI Dashboard, in identifying poor-performing institutions and conduct risk-based and differentiated monitoring and accreditation reviews, using the existing flexibility provided under law and regulations.⁵²
- ▶ The creation of a permanent task force for coordinating the flow of information about institutional performance, sanctions, and legal action, among accreditors, state authorizers and federal agencies, including the Department of Veterans Affairs and State Attorneys General, among others.
- ▶ The Department of Education should adopt the GAO recommendation it agreed with in principle and begin

using outcomes data systematically and extensively in its reviews of accreditors, including through comparisons with accreditor sanctions data to identify ineffective accreditors and inform its recognition process.

- ▶ Accreditors that fail to take corrective action against low-performing schools and scrutinize whether they consistently apply and enforce their standards should be held accountable by the Department.
- ▶ The Department should systematically and consistently analyze outcomes and sanctions data to prioritize program reviews, as well as oversight and enforcement actions more broadly. The Department should also explore the types of accreditation documentation, beyond probation letters, that can help inform and prioritize efforts to safeguard student and taxpayer dollars and take action accordingly.

Legislative changes should include the following:

- ▶ Repeal the statutory prohibition on the Department's ability to set and enforce expectations regarding student achievement standards in accreditor recognition criteria.
- ▶ Require differentiated accreditation and recognition that replaces the current "all or nothing" approach (accredited

or not, recognized or not) with a system that is driven by student outcomes and other risk factors and distinguishes accreditation levels among institutions and recognition levels among accreditors.

- ▶ Set minimum thresholds or "bright lines" for the core metrics — retention, graduation, loan repayment and earnings — that will trigger automatic reviews by accreditors, require a plan of corrective action and evidence-driven interventions, and entail a set of progressively severe sanctions under specific timelines. Similarly, establish portfolio performance thresholds that will trigger accreditor reviews by the Department.
- ▶ Allow accreditors and the Department to "reward" high-performing institutions and accreditors, respectively, with fast-track reviews, while requiring more rigorous and frequent reviews processes for low-performing institutions and accreditors.
- ▶ Empower accreditors and the Department to take swift, emergency action against institutions and accreditors, respectively, with persistent low performance that pose an immediate and high level of risk to both students and taxpayers through expedited reviews.

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