The Association of American Universities appreciates the opportunity to provide additional input to NACIQI today.

As stated in AAU’s written comments submitted in February, the system of regional accreditation has played a critical role for more than a century, providing a basic quality assurance to students and their families, the government, and the broader public. It reflects a fundamental responsibility for ALL institutions to demonstrate the ability to provide a quality education in return for federal student aid. While this largely non-governmental process of peer review has historically been controlled and managed by institutions, as the federal student aid budget has grown, so has federal involvement in the process. With such a diverse higher education system, many have concluded that the accreditation process is not effectively meeting its core functions of assuring basic compliance for the purposes of federal student aid eligibility and effectively facilitating quality improvements through accreditation’s peer review evaluation process.

For the purposes of today’s panel, I will focus my comments on Issue #1, regulatory burden and data needs, recognizing that all of the issues on the agenda for this meeting are interrelated and must be addressed if we are to improve our overall system of accreditation. In particular, it will be critical to clarify the role of the federal government and NACIQI in establishing institutional accountability for the use of federal funds and, in contrast, the role of accreditors in carrying out
the necessary judgments about academic quality, a complimentary but quite distinct role to that of NACIQI.

My comments are designed to provide the committee with a snapshot of the concerns that AAU is hearing from its members, as well as begin to outline steps that NACIQI might take to address these concerns.

Regulatory Burden and Data Needs

As higher education institutions are operating in a highly regulated economy, we (the higher education community—and the Administration) have placed a high priority on reducing regulatory burden, across the board. But make no mistake, the burdens associated with the accreditation process are real and are not just a by-product of this over-regulated environment.

Our informal survey of institutions shows that accreditation reviews have led to many positive developments. But in the last decade these reviews have also become increasingly onerous, time-consuming for senior administrators and faculty, and expensive—with on average—costs for major research universities beginning at $1 million for the first year of a three- to six-year process, at a time when institutional resources are either flat or declining. It is our understanding that several individual institutions have provided you with specific details on direct costs in dollars and faculty time.

AAU believes it is very important to avoid drifting into a system in which the cost of data collection and reporting requirements outstrip their benefits. As a result of the increased regulatory and data burdens, we now see an increasing cost-benefit disparity that calls into question whether the current accreditation system is sustainable, much less effective.

Regional accreditors are clearly caught in the middle. They are forced to constantly revise their procedures to handle the new demands from the Department in the form of regulations and guidance, often translating into more bureaucratic layers of reporting and prescriptive demands for specific outcome measures. As a casualty of these demands, many institutions report that faculty participation on a site-visit team has become unappealing. This trend is very troubling. To work effectively, the system must rely on a site-visit team comprising the necessary balance
of qualified faculty and administrators from peer institutions. But an increasing number of institutions are reporting that this, in fact, is not the case.

NACIQI should take a comprehensive look at what is currently being asked of accrediting agencies and the institutions (of all sectors) they accredit, with the goal of developing models of evaluation and accreditation review that simultaneously decrease the burden imposed on institutions while meeting accountability goals. Is there a more nuanced approach (a tiered approach) to re-accreditation review, that would meet the external demands of accreditors and reduce demands on institutions—particularly those that have demonstrated success?

Related to regulatory burden is the assessment of student learning outcomes—and the definition of institutional “continuous improvement” in meeting set student learning outcomes. It is increasingly clear that there has been a shift from the assessment of inputs to the evaluation of outputs, which can be a step in the right direction of strengthening the culture of learning assessment. But while the federal government is prohibited from regulating on student achievement standards, in practice many institutions are being required to conform to a common set of standards or encouraged to use general, value-added assessment instruments, such as the Collegiate Learning Assessment. The CLA is a relatively new instrument though and needs more refinement to effectively demonstrate its reliability and validity. Even then, these instruments do not necessarily work for all institutions and in their current formulation will not necessarily advance the goal of improving student outcomes. In general, establishing a baseline set of data for all institutions is unlikely to be workable or effective, and we should be careful not to make qualitative judgments based on quantitative information alone.

NACIQI should explore ways in which the federal government can achieve greater accountability not through prescriptive, government-established learning outcome measures, but basing eligibility on other capacity and financial considerations. These measures should—if properly designed and implemented—curb fraud and abuse and crack down on degree mills. At the same time, regional accreditors should work with institutions to develop meaningful assessment tools that evaluate student achievement according to their own mission and student
body, perhaps developing standards that are relevant to sectors of institutions, rather than applying standards across very different institutions.

Many institutions are, in fact, open and interested in thinking through a range of new measures to gauge student achievement, such as higher graduation rates, alumni surveys of greater satisfaction, among others. [Please be clear that AAU is NOT recommending a new set of standards, but asserting that institutions are open to a discussion about what standards make the most sense to them and their sector.]

As we wrestle with identifying the most appropriate set of data, we need to remind ourselves that the U.S. higher education system is based on diverse institutions being able to manage their own academic programs, while also maintaining credibility with their funders and the public. The system SHOULD allow for different treatments of institutions with different missions and varying levels of quality—effectively weeding out those that do not meet basic fiscal and operational thresholds and work with others to improve their academic programs.

In conclusion, it is increasingly clear that applying a one-size-fits-all set of standards, data requirements, and review procedures regardless of type, size, and mission of an institution is not an effective model for accreditation. We must work to reduce regulatory burden and reassess the call for the adoption of metrics that purport to quantify student learning outcomes in ways that are not meaningful or may be inconsistent with the educational mission of a college or university. Again, AAU appreciates the opportunity to provide input and looks forward to ongoing discussions with NACIQI.