

Northwest Commission on Colleges and Universities
8060 165th Avenue NE
Suite 100
Redmond, WA 98052

November 27, 2018

Re: 2018-19 Standards and Eligibility Requirements Revision

Dear Members of the Bylaws, Standards, and Policies Committee of the Northwest Commission on Colleges and Universities,

Thank you for the opportunity to contribute to Northwestern Commission on Colleges and Universities' (NWCCU's) review of its Standards of Accreditation, Policies, and Eligibility Requirements. This comment is submitted on behalf of the undersigned four organizations.

Accreditation is an important quality control providing a safeguard for the nation's students and taxpayers. As a regional accreditor serving as a gatekeeper to almost \$6 billion in Title IV aid each year and overseeing institutions that serve over 850,000 undergraduate students, strong NWCCU standards are essential in ensuring quality in higher education. We commend NWCCU's efforts to solicit broad input from its stakeholders and the public, and thoughtful questions for consideration to guide the review process.

In the interest of ensuring a high-quality postsecondary education for students, we would like to submit the following recommendations on how NWCCU's standards could be further improved for your consideration.

Student Achievement and Success

As gatekeepers to federal aid dollars, accrediting agencies must ensure that colleges are providing a quality education and that America's higher education system is truly a generator of social and economic mobility by focusing on how students fare.

While NWCCU's work with the Council of Regional Accrediting Commissions (C-RAC) and pilot study with the National Student Clearinghouse are good first steps and should be applauded, there is still much work to be done. Much like the other regional accrediting agencies, NWCCU, through this process, has the opportunity to prioritize student outcomes within its accreditation standards, such as retention, graduation, and student loan default and repayment rates.

For example, a report reviewing accreditor standards earlier this year from the Center for American Progress found that, unlike most other regional agencies, NWCCU standards fail to require a specific focus on student outcomes within its reviews of institutions of higher education, do not require institutional performance goal-setting or the use of quantitative outcomes data to make tangible improvements in serving students, and do not have standards

that focus on equity in student outcomes.¹ Instead, NWCCU standards leave student outcomes entirely up to the discretion of institutions, a methodology that fails to ensure basic outcomes at all institutions and, potentially, puts students and taxpayers at greater risk.

Fortunately, the U.S. Department of Education (Department) makes these data regularly available to accreditation agencies through the accreditor dashboards, and performance data by accreditor produced before NACIQI meetings and through the College Scorecard.² Additionally, NWCCU already collects some data on student outcomes itself, which could be used to adopt a more results-based approach in its annual reporting requirements, which includes data on enrollment, completion, default, and retention. In order to be more effective in ensuring student success, data on student outcomes should be better connected to NWCCU standards. The following recommendations would help NWCCU strengthen its standards and ensure a basic level of success at the institutions it oversees.

Recommendations

- **Establish minimum thresholds for student outcomes, such as graduation, completion, retention, loan default, and loan repayment rates.**

NWCCU should establish minimum thresholds for student outcomes to ensure that all institutions are meeting a basic level of success. There are several ways that NWCCU can consider the incorporation of minimum thresholds within its revised standards.

One option would be to set a minimum threshold for individual student outcome measures. For example, if an institution has below a certain percentage of students completing an award or degree, it would be subject to a more thorough review by NWCCU or issued a shortened accreditation cycle. This is the same approach undertaken by C-RAC in its graduation rate review. In contrast to NWCCU's current standards, this approach would codify the agency's expectations for the institutions it oversees. It would measure and track student outcomes annually in order to guarantee an expected level of performance, while emphasizing improvement over time. This may be accomplished using measures that differ based on institution type or mission, such as community colleges and four-year institutions. Such measures should be rigorously benchmarked against both the current performance of NWCCU institutions and the performance of all regionally accredited institutions.

A second option would be to conduct further scrutiny or implement a shortened accreditation cycle for institutions that fall below a threshold on at least two student outcome measures. For example, if an institution demonstrated a low graduation rate and a low loan repayment rate, it would trigger the actions from NWCCU listed above. This option may encourage a more holistic

¹ Antoinette Flores, "How College Accreditors Miss the Mark on Student Outcomes," Washington: Center for American Progress, 2018, available at <https://www.americanprogress.org/issues/education-postsecondary/reports/2018/04/25/449937/college-accreditors-miss-mark-student-outcomes/>.

² National Advisory Committee on Institutional Quality and Integrity, "Accreditor Data File," and "Accreditor Dashboards," available at <https://sites.ed.gov/naciqi/archive-of-meetings/>; U.S. Department of Education, "College Scorecard Data," available at <https://collegescorecard.ed.gov/data/>.

approach to institutional success, yet may also fail to address specific problem areas at an institution that demonstrates poor outcomes on any one individual metric.

When determining which student outcomes to use, NWCCU may want to consider some of the data made available by the Department, to reduce burden and ensure that the information they use is verifiable. Some outcomes that NWCCU can consider might include:

- **Outcome Measures Completion Rate:** This measures the percentage of students who have earned an award or degree within eight years of entering an institution. Unlike previous graduation rates, it also includes completion outcomes for part-time students and students who transferred into an institution.
- **Percentage of Students Earning Above a High School Graduate:** This measures the proportion of students who received federal financial aid and earn above a typical high school graduate (\$28,000) within six years of entering an institution. This helps demonstrate that there is at least some financial gain for most students who attend an institution of postsecondary education.
- **Loan Default Rates:** This measures the percentage of students who have defaulted on their federal loans within three years of leaving the institution and entering repayment.
- **Loan Repayment Rates:** This measures the percentage of students who are able to pay down at least \$1 on their loan principal or have not defaulted within three years of leaving an institution and entering repayment.³

While the second option to trigger action if an institution falls short on at least two measures may be more comprehensive, it also may cause more complexity, as some institutions may not have data on all outcomes.

- **Require goal setting to foster improvement in student outcomes.**

Just because an institution falls above a minimum threshold does not mean its performance is adequate, so standards should also be strengthened to improve performance overall. There are several methods NWCCU could use to foster continuous improvement. For example, NWCCU could require institutions in the bottom half of performance on student outcome metrics to complete a thorough analysis of its student achievement measures during the self-study and undergo further review during the site visit. Institutions would be required to set ambitious but achievable goals and design comprehensive plans for improvement; be subject to heightened reporting requirements, including an annual report describing actions taken, data, and evaluation on its progress goals; and/or that they commit to greater transparency by publishing improvement plans and annual progress reports. Continuous quality improvement is a core tenet of accreditation and NWCCU should foster improvement among its institutions in a measurable way.

- **Consider equity in data collection and standards for student achievement**

NWCCU should require that data collected through institutional annual reporting requirements are disaggregated by student demographics including race, income, and gender. NWCCU should

³ Data measures come from the U.S. Department of Education's College Scorecard available at <https://collegescorecard.ed.gov/assets/FullDataDocumentation.pdf>.

also have standards requiring institutions to address gaps in performance by demographics. Today, only two regional agencies—WSCUC and ACCJC—have standards on equity.⁴ These standards are important because they require that institutions go beyond overall performance indicators to ensure that they are serving all students well.

Risk-Based Accreditation and Alternative Pathways

If NWCCU does more to implement strong standards and reviews focused on its student outcomes, it could then use its results to differentiate reviews. Pursuing risk-based accreditation and alternative pathways is a welcome advancement to introducing flexibility in the accreditation process instead of a one-size fits all approach.

Recommendation

- **Implement a risk-based pathway based on student outcomes**

NWCCU should provide a path for high-performing institutions to face streamlined reviews if an institution can demonstrate a high bar for student outcomes.⁵ Several accreditors are pursuing differentiated paths for institutional reviews. For example, WSCUC announced its Thematic Pathway for Reaffirmation that lessens the burden of reporting and reviews. Eligibility for the thematic pathway is limited only to institutions that demonstrate strong retention and graduation rates, including rates disaggregated by demographics; healthy finances, including an institution's composite financial index from the Department and cohort default rate; stable enrollment; and history of accreditation.⁶ NWCCU could adopt a similar approach, and take it a step further by also creating a high-touch accreditation review cycle for the lowest performers. For example, institutions that do not meet minimum thresholds of performance, demonstrate low student outcomes, are financially unstable, or present other risks — such as complex substantive changes — should undergo more frequent and high-touch reviews that include plans for improvement and heightened reporting requirements.

Transparency

As gatekeepers, accrediting agencies play a critical role in ensuring the quality of postsecondary institutions. Many things go into effective oversight, but consistency and transparency are an integral part of it. Consistency ensures that all institutions are being held to a high standard of performance and accountability. Accrediting agencies, including NWCCU, should be more transparent about accrediting decisions and the reasons why actions are taken. Students and the public should not be kept in the dark when a college or program is not performing up to standard.⁷

⁴ Flores, Miss the Mark.

⁵ Ben Miller, Written Testimony, “strengthening Accreditation to Better Protect Students and Taxpayers,” before U.S. House of Representatives Education and the Workforce Committee, April 27, 2017, https://edworkforce.house.gov/uploadedfiles/miller_written_testimony.pdf.

⁶ WASC Senior College and University Commission, “Thematic Pathway for Reaffirmation,” available at <https://wascsenior.app.box.com/s/kf1vgf9261y8qs6n7j92kt7z7i5iqkuy>.

⁷ Antoinette Flores, “Watching the Watchdogs: A Look at What Happens When Accreditors Sanction Colleges,” Washington: Center for American Progress, 2016, available at <https://cdn.americanprogress.org/wp-content/uploads/2016/06/16111301/AccreditorActions-report.pdf>.

NWCCU has an opportunity to improve its standards and policies. For example, NWCCU recently placed the University of Providence on probation, but information on NWCCU's website provides very little information about *why* the agency took action. This is in stark contrast to other agencies that provide detailed information in an accessible way on its website.⁸ Unlike most other agencies, NWCCU allows an institution to appeal a serious sanction before it is ever made public.⁹

Recommendation

- **Inform the public and students of sanctions**

Students and the public need to be better informed of accrediting sanctions. NWCCU should provide detailed information about why an action is taken, including reporting when a sanction is removed, providing the final decision letter on the accrediting sanction on its website as soon as it becomes available, and detailing the reason for the action in that letter and in other communications to the public and the Department. It should also eliminate the option for an institution to appeal a sanction before the action is made public and require institutions to inform current and prospective students with reasons why the action was taken.

Thank you again for the ability to offer public comment.

Sincerely,
Center for American Progress
Higher Learning Advocates
New America
Third Way

If you have questions please contact:

Antoinette Flores
Associate Director, Postsecondary Education
Center for American Progress
aflores@americanprogress.org

Clare McCann
Deputy Director for Federal Policy
New America Higher Education Initiative
mccann@newamerica.org

Emily Bouck West
Director of Policy and Advocacy
Higher Learning Advocates
ebouckwest@higherlearningadvocates.org

Michael Itzkowitz
Senior Fellow
Third Way
mitzkowitz@thirdway.org

⁸ Higher Learning Commission, "Public Disclosure Notices and Public Statements," available at <https://www.hlcommission.org/Student-Resources/public-disclosure-notices.html>; Middle States Commission on Higher Education, "Non-compliance and Adverse Actions," available at <https://www.msche.org/non-compliance-and-adverse-actions/>.

⁹ Rick Seltzer, "Due Process or Delayed Announcements," *Inside Higher Ed*, September 18, 2018, available at <https://www.insidehighered.com/news/2018/09/18/summer-probations-raise-question-when-accreditor-should-disclose-colleges-status>.