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How Common Definitions for Student Achievement Can Strengthen College Accreditation



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The accreditation process is the gateway between colleges and federal financial aid—schools must be accredited by an agency approved by the Department of Education (Department) to participate in taxpayer-funded grant and loan programs. As part of their quality assurance role, accreditors are charged with holding the schools in their portfolios to rigorous standards, including laying out clear policies for how schools should demonstrate that they can achieve positive student outcomes.

Despite accreditors' crucial responsibility as the watchdogs of higher education, many fail to ensure that the institutions they accredit provide quality education and outcomes. For example, some accreditors give seals of approval to undergraduate institutions that fail at making sure their graduates go on to make more than a high schooler in their state.¹ Others accredit schools with graduation rates as low as 19%.² Making matters worse, some agencies make it virtually impossible for students' concerns about institutions to be considered through their complaint-filing processes.³ This is just a short list of the issues that are plaguing higher education accreditation. If these problems are not addressed, accreditors will continue to reinforce a system that fails to protect students and gambles with taxpayer dollars.

While the issues within the accreditation system are vast, there is one issue that the Department can address now: common definitions for student achievement. Unfortunately, there is little consistency in how accreditors currently

assess and hold schools accountable for meeting student achievement standards. With dozens of approved accreditors and limited guidance from the Department about how student achievement should be defined, expectations and outcomes are all over the map. This confusion and lack of accountability around student achievement is a disservice to students, who trust that accreditation from any Department-sanctioned agency is a bona fide seal of quality. It is also detrimental to taxpayers, who entrust these agencies with stewarding billions of dollars across the higher education system yearly.

The Department's next negotiated rulemaking table creates an opportunity to provide a set of common definitions for student achievement measures and encourage accreditors to align their review standards with those definitions.⁴ Common definitions would increase consistency for students and prioritize strong outcomes across all programs and all institutions receiving federal aid. Below, we unpack how accreditors currently approach achievement measures and how the Department can support them in prioritizing successful outcomes for students and graduates.

What Does “Student Achievement” Mean?

Department policy already states that assessing student achievement should be a priority that each accreditation agency sets for their respective institutions. The Accreditation Handbook cites the federal regulation governing accreditation, under which accrediting agencies must fulfill several requirements to receive Department recognition.

34 CFR § 602.16 Accreditation and preaccreditation standards.

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if the following conditions are met:

(1) The agency's accreditation standards must set forth clear expectations for the institutions or programs it accredits in the following areas:

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of State licensing examinations, course completion, and job placement rates.

(ii) Curricula.

(iii) Faculty.

(iv) Facilities, equipment, and supplies.

(v) Fiscal and administrative capacity as appropriate to the specified scale of operations.

(vi) Student support services.

(vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.

(viii) Measures of program length and the objectives of the degrees or credentials offered.

(ix) Record of student complaints received by, or available to, the agency.

(x) Record of compliance with the institution's program responsibilities under title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency

Source: 34 CFR § 602.16 – Accreditation and preaccreditation standards, <https://www.law.cornell.edu/cfr/text/34/602.16>. Emphasis added.

This regulatory language around an accreditor’s role in assessing student achievement is far from prescriptive, presenting only a baseline mandate for accreditors to establish standards for how they expect their institutions to measure student achievement. The regulation gives accreditors significant leeway in establishing benchmarks to measure institutions’ student achievement. Yet some accreditors do not identify any student outcomes on which they base their review of an institution. And while some accreditors set disclosure requirements and numeric baselines for their institutions’ student achievement results—for example, a licensure pass rate of at least 70%—others only require that the institutions they approve show a “commitment” to students’ educational outcomes and have processes in place to evaluate and improve achievement in some way.

This vague regulatory language opens the door for accreditors to make their own rules about assessing student achievement and for schools to be held to vastly different standards depending on their accreditor (or worse, no standards for student outcomes at all). Students are left to assume that the status of being accredited conveys a baseline level of educational quality and student success, which is not always the case. The inconsistencies in measuring student achievement across accreditors create a confusing web of descriptors and standards for the Department, and they make it difficult to determine how effectively each accreditor assures successful student outcomes and whether they are a responsible steward of taxpayer dollars.

How Accreditors Consider Student Achievement

In 2017, the Department collected and published the student achievement standards of 50 recognized accrediting agencies, including regional, national, and programmatic accreditors.⁵ We analyzed this report (the latest public document of its kind) to explore how student achievement data were assessed. Our analysis focuses on the three areas explicitly named in the regulation: course completion, state licensing exams, and job placement rates.

Course and Program Completion

The majority—64%—of accreditors considered course or program completion as part of their student achievement standards, but there are glaring differences in how they looked at “completion.” Accreditors used different terminology to define specific outcomes, such as graduation rates, attrition rates, and retention rates. For some accreditors, minimum completion rates differed based on the field of study.

Explanations of how course completion reporting was collected and used to assess institution compliance varied across accreditors. Some accreditors included a general reference to course completion in their policies, leaving significant room for schools to interpret how they could demonstrate that standard using quantitative or qualitative data. Other accreditors laid out detailed target course completion rates that they expect institutions to attain (and which could lead to accreditor reviews if not met). Specific completion benchmarks varied from 40% to 80% by accreditors and their respective schools and programs.

State Licensure Examinations

Consideration of state licensure exam metrics varied widely across accreditor types. Requirements for state licensure are set by the state rather than an accreditor, and most programmatic accreditors (but almost no national or regional accreditors) considered licensure-related metrics in their student achievement standards. Licensure is required for fields like nursing, law, and counseling, where passing an examination or certification is a prerequisite to obtaining

employment. Therefore, licensing exams are more prevalent among accreditors that accredit career programs within licensed professions.

Programmatic accreditors define their acceptable program standards for state licensure examinations in their policies and handbooks using terms like praxis exam, certification, and licensure pass rates. Licensure exams, certification benchmarks, and pass rate descriptions vary based on the type of program. For example, a future lawyer would take the state bar exam while a future nurse would have to pass the NCLEX, necessitating differences in how accreditors name and assess achievement. For programmatic accreditors that require some form of examination, our analysis reveals that accreditors are looking for pass rates between 70% and 80% for institutions to demonstrate acceptable achievement outcomes.

Job Placement Rates

Our review found that 54% of accreditors had a standard for job placement rates as part of their assessment of student achievement. Like course completion and licensure metrics, accreditors also used multiple terms and metrics to consider job placement and employment outcomes in their policies. Terms included job placement rates, career placement rates, and final placement rates (typically measured 12 months after completion); placement in residencies, particularly for medical fields; placement into graduate programs; and measures of job performance, such as employer satisfaction and employer evaluations of program graduates.

Some accreditors specified job placement benchmarks that their institutions were expected to meet, which ranged from 50% to 90%. Within those benchmarks, however, job placement rates lacked consistency about what type of job students obtain after completion and within what period, whether the employment must be in their field, or how some accreditors define employment. Job placement metrics, like course completion and state licensure, vary widely across accreditors.

Pursuing Common Definitions for Student Achievement

This analysis underscores a critical challenge in the accreditation process: the need for common definitions to provide shared context and understanding of student achievement measures. When accreditors are assessing student achievement to evaluate their institutions' progress, they should be using the same language. The Department should take the opportunity of its next negotiated rulemaking table to establish universal standards for accreditors so there is a common understanding of how student achievement should be evaluated and how accreditors should collect and report those data. To define these measures, we recommend that the Department use existing accreditor student achievement standards to provide a term bank of common language that accreditors can adopt as part of their policies —so that when they are talking about student outcomes, those assessments are apples to apples.

As evidenced in our analysis of the Department's 2017 report on accreditors' student achievement standards, there are already some consistencies in how agencies report course and program completion, state licensure pass rates, and job placement rates. The Department can build on these trends to establish newer, clearer student achievement definitions for accreditors. Providing a consistent term bank would allow accreditors to retain massive flexibility while establishing more consistent reporting and data collection efforts and giving policymakers a better understanding of how (or whether) those agencies are sufficiently prioritizing student success. As part of this effort, the Department should also publicly update its student achievement standards report, as the most recent is over half a decade old.

The Department should compile and share its list of common definitions, paired with recommended data collection practices, to ensure consistency across accreditors. The list should include the definitions for completion, licensure attainment, job placement rates, and other frequently used student success measures, along with information about the median benchmarks accreditors are using to assess an institution's performance on those measures.

Some variance in accreditation standards is expected, particularly among programmatic accreditors who oversee programs preparing students for specialized technical and vocational work. However, this flexibility need not prevent the Department from taking commonsense steps to review and analyze overall trends in how approved accreditors define student achievement and establish shared definitions grounded in current practice. In this way, the Department can help establish greater consistency and quality assurance for student achievement across accrediting agencies and begin to address one of the big failures of our current accreditation system.

Conclusion

Ensuring appropriate oversight and standards for how institutions of higher education deliver for their students is a critical responsibility entrusted to recognized accrediting agencies. The lack of common definitions for measures of student achievement presents a fixable flaw in the current accreditation system. By setting common language around student success, the Department can ensure greater consistency across accreditors' student achievement standards, instilling a greater focus by these agencies on whether their approved institutions to deliver positive outcomes for students who enroll in an accredited school or program.

TOPICS

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ENDNOTES

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