

House Education and Workforce Committee Hearing  
“Strengthening Accreditation to Better Protect Students and Taxpayers”  
April 27, 2017

Testimony of Dr. Mary Ellen Petrisko  
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Chairwoman Foxx, Ranking Member Scott, and members of the committee: Thank you for the opportunity to testify today. My name is Mary Ellen Petrisko, and I am president of the WASC Senior College and University Commission, an accrediting body serving public and private higher education institutions throughout California, Hawaii, and the Pacific, as well as a limited number of institutions outside the U.S.

The first accreditor of colleges and universities was founded in this country in 1885—when there were just 36 states in the union. Just as our country has grown and developed over the past 130 years, so too has accreditation changed to become what it is today: an outcomes-focused system of quality assurance that relies on voluntary peer review.

The work of accreditation is grounded in standards aligned with those dictated by U.S. Statute and Regulations. Since 1952, related to the GI Bill, accreditors have been recognized as quality assurance agencies that protect the federal government’s investment in higher education. Accreditation has traditionally existed as part of a quality assurance triad, in collaboration with state and federal government. The traditional role of the state has been that of consumer protection; that of the federal government has been that of responsibility for the considerable federal expenditure on student aid. In recent years, both the state and federal government’s responsibilities as part of this triad have increasingly been seen as the work of the accreditor.

Colleges and universities in the United States have an international reputation for exceptional quality, as does our system of accreditation. Indeed, many institutions around the world aspire to be accredited by a U.S. accreditor. But the fact that our accreditation system is a strong and much-admired system does not mean that it and our larger quality assurance triad are perfect.

Today’s hearing is focused on opportunities to improve accreditation. While I believe accreditors largely do a good job in protecting students, I also believe steps could be taken in the reauthorization of the *Higher Education Act* to create a stronger accountability system and therefore better serve students. But first, I’d like to tell you about some things that we are doing to support student success and protect the public’s investment in higher education.

At WSCUC, we define student success as student learning AND retention and completion. With regard to the latter, let me begin by noting that federal IPEDS data only measure completion for first-time full-time students at an institution. In the WSCUC region, IPEDS covers only about 360,000 of our 900,000 undergraduate students – making more than 500,000 students invisible.

To address the insufficiency of these data, WSCUC has developed the Graduation Rate Dashboard, a tool that enables us to see how many students graduate from an institution – no matter their enrollment status or time to degree.<sup>i</sup> Given that the majority of our students fall outside the IPEDS measure, this is an important development. The Dashboard can provide institutions with more complete and inclusive

information regarding student success; shine a light on enrollment, retention and graduation patterns; and allow WSCUC and institutions to better identify and address issues that affect student success.

The Dashboard can be seen as a sort of balance sheet that tracks how many credits are given out by an institution; how many are “cashed in” for a degree; and how many are left on the table. WSCUC collects six data points from institutions via our annual report, the baseline data tracked for all accredited, candidate and eligible institutions and referenced by WSCUC staff, peer evaluators and the commission during every accreditation review. On the basis of those data points, two completion measures are calculated: the “unit redemption rate” – i.e., the proportion of units granted by an institution that are eventually “redeemed” for a degree from that institution—and the “absolute graduation rate”—i.e., the proportion of students entering an institution who eventually graduate from that institution. The difference between the IPEDS graduation rate and the Dashboard rate can be significant: in the case of California State University Dominguez Hills, for example, the difference between a 30 percent IPEDS rate and a 60 percent Dashboard rate.

WSCUC has also contracted with the National Student Clearinghouse to receive data on both regional and national completion rates. The Clearinghouse includes in its completion data both transfer students and students enrolled after the six-year period that IPEDS uses as the cutoff for measuring institutional cohorts’ graduation rates. One of the benefits of the Clearinghouse data is that they, like IPEDS data, can be disaggregated by gender and ethnicity, as well as by institution type, which can be very beneficial in evaluating institutional effectiveness in supporting student success.

As student completion is important to all accreditors, the Council of Regional Accreditors, or C-RAC, recently launched a nationwide effort to place increased emphasis on graduation rates as part of our ongoing review of colleges and universities. Each accrediting body will use, at a minimum, a 15 percent IPEDS graduation rate for two-year institutions and a 25 percent rate for four-year institutions—about ½ the national average-- as triggers to closely examine institutional student success and plans for improvement.

Let me conclude by making three recommendations for the strengthening of our system of accountability, related to innovation, transparency, and appropriate levels of regulation.

First and foremost, I believe it is critical that the HEA reauthorization support the innovation necessary to serve current and especially future students, and that it allow accreditors the flexibility to review and approve innovations in a safe zone, as is allowed by current experimental sites. As our regional undergraduate population demonstrates, the majority of students today do not go to one institution full-time and finish within four years. I hope that the reauthorization will keep these changing student demographics in mind.

Secondly, whatever steps are taken to provide greater transparency should ensure that students can access accurate and relevant information on our institutions. Currently available data from the College Navigator and College Scorecard are sometimes inaccurate, sometimes in conflict with one another, and are limited due to their reliance on IPEDS data. Better information can help students make better choices and promote enhanced accountability across higher education. Understanding this, we at WSCUC have published all of our team reports and Commission action letters on our website since July 2012.

Finally, I hope that excessive regulations, such as those related to substantive change and defining the credit hour, will be addressed and moderated. Such regulations inhibit innovation and add costs and burdens to institutions without adding value.

Chairwoman Foxx and Ranking Member Scott, thank you again for allowing me to testify. I look forward to answering your questions and furthering the discussion around accreditation and higher education reform.

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More Information is available on the WSCUC website: <https://www.wscuc.org/resources/about-the-graduation-rate-dashboard>