

Testimony of Dr. Michale S. McComis, Executive Director,
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Before the

House Subcommittee on Higher Education & Workforce Training
On
“Keeping College in Reach: Discussing Program Quality Through Accreditation”

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Madame Chair and members of the Subcommittee, my name is Dr. Michale McComis and I am the Executive Director of the Accrediting Commission of Career Schools and Colleges (ACCSC), a private, non-profit independent national accrediting agency recognized by the United States Secretary of Education. ACCSC accredits over 730 postsecondary, career- and vocational education-oriented institutions that serve 225,000 students throughout the United States. I am honored to appear before the Committee this morning to discuss accreditation and the contributions that it makes to the quality of education in this country.

Accreditation as an education quality assessment mechanism has been the hallmark of educational success in this country for over a century and relied upon by the federal government for this purpose for six decades. Although accreditation has come under increased scrutiny by policy makers, accreditation can and should continue to serve in its gate-keeping capacity, albeit in an enhanced form which I will describe later in my testimony. Accreditation employs an earnest and collaborative approach within a peer-review network that identifies best practices and assesses how well an institution meets those best practice standards. It is not, nor can it be, a one-size-fits-all system with rudimentary metrics that do not take into account subjective and qualitative elements of an institution’s operations.

Accreditation has four essential pillars that are built upon a foundation of peer review. Those pillars are: 1) standards or best practices, 2) self-evaluation and assessment, 3) on-going institutional assessment and improvement, and 4) accountability.

1. **Standards:** Through peer review, best practices are established and mandated;
2. **Self-evaluation:** Institutions are evaluated internally and externally and assessed as to how well they meet standards and can demonstrate success through student outcomes;
3. **On-going Institutional Assessment and Improvement:** Expectations of significant and on-going institutional assessment and improvement are established; and
4. **Accountability:** Institutions are held accountable for compliance with standards and outcomes – to include the loss of accreditation –when expectations are not met.

Accreditation also takes different forms and serves many different kinds of institutions. National accreditors, such as the agency I represent, primarily accredit institutions that offer an array of career- and vocationally-oriented programs that are mainly non-degree and sub-baccalaureate degree with some baccalaureate, master's and doctoral degree programs. Regional accreditors, on the other hand, primarily accredit community colleges, 2 and 4 year colleges, and universities that offer degree programs in in an array of liberal arts and professional fields as well as some non-degree and degree programs in vocational fields. Given the wide variety of accredited institutions, it follows that institutions will be accredited by different types of accrediting agencies with different standards and different expectations of learning and outcomes. This is both appropriate and necessary. However, the differences among accreditors and the types of institutions they accredited do not make one type of accreditation “better” than another – the success of any accreditation agency is not based on the type of institution accredited but upon the

strength of each of the fundamental pillars in the agency's system and the strength of the peer review foundation. All accreditors, regional or national, and regardless of the types of institutions accredited, should enforce an accountability-based model that combines rigorous input standards with performance outcomes in categories such as student learning, student assessment, and student achievement.

I recognize that the expectations of accreditors by the federal government are changing, such that accreditors are subject to far greater federal oversight than at any time in the past. Congress has a vested interest in ensuring that the strength of any accrediting agency is at an appropriate level before that agency may be recognized as a gatekeeper to Title IV funds. As such, the Congress should seek to enact changes to the Higher Education Act that will responsibly and appropriately provide such assurance; however, this should be done without injecting undue and inappropriate federal intrusion into the academic processes of higher education.

The President has stated that he will call on Congress to "consider value, affordability, and student outcomes in making determinations about which colleges and universities receive access to federal student aid, either by incorporating measures of value and affordability into the existing accreditation system; or by establishing a new, alternative system of accreditation that would provide pathways for higher education models and colleges to receive federal student aid based on performance and results." From my vantage point, measures relating to performance and results are present in the existing accreditation system, although in a variety of forms and not always in easily packaged up or down metrics. However, it is the variety of these measures that contribute positively and materially to the strength of our decentralized oversight of education in

this country. Given the President's statement, however, accreditors must do better at defining student achievement outcomes with greater transparency to show how these measures are applied so that the public and policy makers can rely on the results of their evaluation processes. Accreditation, as the sector with the principle responsibility for quality assurance in higher education, needs to work earnestly toward moving the discussion of quality through accreditation from skepticism to confidence.

My sincere hope is that any judgment regarding the effectiveness of accreditation not lose sight of the fact that the oversight of higher education, as set forth in current law and regulation, is a shared responsibility. Each member of the regulatory triad – state government, accreditor, and federal government – has an essential role to play in the oversight of institutions. In this regard, the Subcommittee should consider several of the recommendations made by the National Advisory Committee for Institutional Quality and Integrity (NACIQI) in its April 2012 Report, including the need to clarify and to articulate common understandings about the responsibilities of each member of the triad, and foster increased communication among triad actors to achieve greater commonality across the quality assurance/eligibility enterprise. By continuing to work together in partnership with the various organizations within the regulatory triad, I believe we can strengthen the existing oversight system while retaining the positive qualities of accreditation and the expertise and nuance that peer-review represents and delivers.

Moreover, for the sake of higher education's advancement, the higher education community – including accrediting agencies – must be allowed to adapt and innovate in order to accommodate the diversity of students, student preferences, and learning. This supports reasons why there is not, and should not be, a one-size-fits-all system of accreditation. As higher

education takes a more diverse shape, accrediting agencies and the peer review process should foster avenues for institutions to develop and deploy innovative approaches that both increase access to higher education and fundamentally change the manner in which education is delivered. Ensuring the quality and integrity of these programs without undue regulatory burden must also remain a paramount concern. The federal definition of a credit hour, however, is an example of undue regulatory burden and intrusion into the academic process by the federal government that stunts innovation. In my experience, competency models of student assessment are superior to “seat-time” models of student fulfillment. But, by creating the federal definition of a credit hour, the U.S. Department of Education federalized a basic academic concept and developed a complex and confusing system that unintentionally serves as a barrier to innovation in educational delivery models such as a movement to competency assessment. Although the Department’s position on “direct assessment” is a step in the right direction, it coexists in federal regulation with the federal definition of a credit hour, which causes uncertainty on how to move forward with more innovative models.

So then, how can accreditation be enhanced through the Higher Education Act? The following are some suggestions for the Subcommittee to consider:

Macro Areas:

1. Outcomes: Outcomes measures are an important part of the assessment paradigm for higher education institutions. But, outcomes measures are not a one-size-fits-all solution and should not be mandated by Congress or the U.S. Department of Education. Accreditors, working with their accredited institutions, must find and define the right set of measures and metrics to evaluate institutional and student success. While program-level rates of graduation and employment work well for the types of institutions accredited by my agency, those same measurements may not be as appropriate in other types of institutions. Moreover, outcomes measures by themselves are not a panacea and alone cannot provide a sole assessment of the quality of an institution or its programs. Input standards are an equally important part of the assessment paradigm and serve to illustrate why accreditation is an important part of the higher education regulatory landscape. Outcomes measurements work best when complimented with rigorous input standards (e.g., standards pertaining to management and educational administration; curriculum design, development, and evaluation; faculty qualifications; learning resources; facilities; student services; student learning; student assessment; and other areas that contribute to quality education programs).

Generally, outcomes measures should be a reflection of how an institution performs relative to standards (i.e., best practices) and should minimally require institutions to assess learning and competency attainment as well as:

- Rates of retention or graduation;

- Rates of employment and certification/licensure exam pass rates in career and professional programs and measures related to “employability”¹ in other program areas; and
- Measures of student and graduate satisfaction.

These kinds of outcomes taken together with an assessment of an institution’s adherence to input standards provide the tools necessary to assess quality and value.

- 2. Accreditation Area of Focus:** It may be useful to require accreditors to focus narrowly the types of institutions accredited to ensure a strong peer-review foundation. This is known as the “bucket” approach whereby types of institutions are grouped into buckets with an accreditor that is focused on that specific type of institution e.g., career- and vocationally-oriented institutions, community colleges, liberal arts colleges and universities, research universities, etc. This approach may allow for better peer-to-peer evaluation and bring about better measures related to outcomes and accountability.
- 3. Transparency:** Accreditors should provide useful disclosures of the accreditation actions taken by the agency that can help the general public make informed decisions about an institution or program.
- 4. Transfer-of-Credit:** Accreditors should have and enforce standards that prevent institutions from unfairly or unjustifiably denying credit transfer.
- 5. Credit Hour Definition and Clock Hour Conversions:** Seat-time requirements for funding programs do not preserve academic integrity nor promote competency assessment and as such the federal definition of a credit hour and the complex clock-hour

¹ By “employability” I mean assessments made by graduates and employers about how well the graduate was prepared to enter the workforce based on the education received. This could serve as an appropriate outcomes measure for student pursuing education in many liberal arts fields.

conversion formulas should be removed from the federal regulations. If accreditors are going to be the purveyors of educational quality assessment, then accreditors should be given the discretion necessary to define the elements that go into the assessment paradigm.

- 6. Changing Accreditors:** Institutions that have been subject to a monitoring, Show Cause Order, or Probation Order from one accreditor should not be allowed, for federal financial aid purposes, to seek a new accreditor for some set period of time after the sanction has been lifted (e.g., three years).

Micro Areas:

- 1. Appeals Process:** The last reauthorization of the Higher Education Act yielded several significant changes to the process that accreditors most enact with regard to the appeal of an adverse accreditation decision. While I believe the Congress was well intentioned, the ensuing regulations have created a far more complex and cumbersome process that has not, in my experience, yielded greater due process for institutions. I suggest the Subcommittee review the history of legislative intent and regulatory changes in this regard and consider reverting back to the pre-2008 requirements.
- 2. Substantive Changes:** The Subcommittee should review the provisions that permit accreditors to visit only a “representative sample” of additional locations if an institution operates more than three additional locations and that allow an institution to establish additional locations without prior approval from its accreditor. In my experience, growth of an institution, to include the addition of geographically distant campuses, should require greater oversight, not less. Accreditors should be required to visit and evaluate

fully each campus or location where federal Title IV financial aid dollars may be spent by students.

It is my hope that the Subcommittee finds these suggestions to be a useful addition to the discussion regarding accreditation's continued role as a gatekeeper to federal financial aid programs and I will be happy to provide additional information as may be requested.

As the executive director of a national accrediting agency, I can attest that my organization is keenly aware of the important role that accreditation plays as a gate-keeping entity in the triad and understands the impact that role has on ensuring the reliability of our nation's current higher education oversight system. I am also cognizant that questions remain from policy members, regulators, and the general public regarding whether accrediting agencies have been living up to our collective responsibilities, and whether or not accreditation has the appropriate level of rigor and outcomes assessments. To that end, I look forward to continuing the dialogue on ways to strengthen accreditation as means to ensure that accreditation continues to fulfill its role as a gatekeeper to the Title IV federal student financial aid programs.

Thank you again for the opportunity to testify before the Subcommittee and I stand ready to answer any questions you may have.