

Testimony of Dr. Michale S. McComis, Executive Director,
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Before the
House Committee on Education & Labor
On “The Department of Education Inspector General’s
Review of Standards for Program Length in Higher Education”
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Thank you for the opportunity to testify. My name is Michale McComis and I am the Executive Director of the Accrediting Commission of Career Schools and Colleges (ACCSC). I am honored to appear before the Committee this morning to discuss the important issue of program length in higher education. I hope to provide the Committee information about ACCSC’s standards and accreditation process in this area, but also to provide you our perspective on the role of accreditation in higher education more generally.

ACCSC is a private, non-profit independent accrediting agency recognized by the Secretary of Education continually since 1967. It is a national agency in scope that currently accredits 789 institutions with over 250,000 students throughout the country. These institutions are predominantly private sector, career-oriented institutions, offering programs at the non-degree, Associates Degree, Bachelors Degree, and Masters Degree levels. They prepare students for trade and technical careers in many areas including allied health, nursing, information technology, automotive technology, commercial art, and unique areas such as horology, luthiery, and yacht building and restoration.

ACCSC’s primary mission is to serve as a reliable authority on educational quality and to promote enhanced opportunities for students. To meet its mission, the Commission has a values-based framework for accrediting focused on integrity, accountability, continuous improvement, open communication and teamwork. My tenure with ACCSC began in 1994,

becoming its Executive Director in 2008. I have recently served on two of the Department of Education's negotiated rulemaking panels – the 2009 Accreditation Panel and the 2010 Program Integrity Panel – to help establish regulations pursuant to the legislative provisions of the Higher Education Act (HEA).

Summary of Testimony:

My testimony is divided into two primary parts. First, I will spend a few minutes placing the issue of program length in the broader context of our higher education system and regulatory structure. It is important to provide a bit of background regarding the need for continued reliance on the regulatory “triad” that provides the student funding and quality-assurance mechanisms for our institutions of higher education. I will speak briefly on how the flexibility of this regulatory structure has helped to support and encourage innovation and diversity in our institutions and their programs and teaching methods. In the context of program length specifically, I will discuss the relationship between the importance of determining the appropriate length of a program, the value of credits provided, and the assessment of student achievement.

The second and most important part of my testimony will provide the Committee with a summary of ACCSC's standards on program length and its process for reviewing institutions generally, and with regard to program length in particular. ACCSC takes pride in the manner by which it has adapted its standards and process to account for the types of institutions and programs that it accredits. I also would like to discuss with the Committee how our standards on program length and credit hour directly relate to our assessments of student achievement at our institutions.

The Broader Context of Higher Education Policy, Accreditation and the Evaluation of Program Length:

It is important to take a minute to put the narrow issue of accreditation standards on program length into the broader context of today's higher education system. Today, the number of "non-traditional" students seeking higher education is steadily on the rise, the majority of whom are working adults. While a traditional liberal arts education at an on-ground institution continues to be an important goal for many students graduating from high school, many other non-traditional students are enrolling in career-oriented programs. Moreover, students are increasingly enrolling on a part-time basis or online to accommodate their work schedules or other family commitments.

Given the growing demographic of career-focused, adult learners, the higher education community must continue to adapt and innovate in order to accommodate the diversity represented in its student body. The higher education community itself is also diverse and is defined by a broad selection of institutions and programs that range from short-term, non-degree programs to four-year liberal arts programs, to graduate level programs in hundreds of different academic areas, taught at institutions both on-ground and on-line. With this rich variety, there is not, and should not be, a one-size, fits all means by which to define or analyze program length or the credits provided by an institution; however, evaluating the continued value provided by an institution's programs remains extremely important.

As higher education takes a more diverse shape, ensuring the quality and integrity of these institutions and their programs continues to be a paramount concern and historically the primary responsibility of accrediting agencies and the schools they accredit. Unlike federal and state governments, accrediting agencies are private, independent entities, focused on establishing

standards and assessing their member institutions in relation to those standards on a peer-review basis and as such are the best resource for making determinations related to educational quality.

Despite the independent, private nature of accreditation, accrediting agencies have been linked to the federal government since the Congress established the Higher Education Act 45 years ago. In this regard, accreditation has played an essential role in institutional and programmatic quality assurance and has served as an essential component of the regulatory “triad” in partnership with federal and state governments for the regulatory oversight of higher education institutions. Institutions eligible for Title IV funds must be accredited by an accrediting agency recognized by the U.S. Secretary of Education and the Higher Education Act created a structure for this recognition process. Included in the Act and regulations are criteria which all accrediting agencies must include in their accreditation standards. One of these criteria requires standards that assess an institution’s measures of program length and the objectives of the degrees or credentials offered.

The Act is written in a manner that respects an accrediting agency’s independence and the need for flexibility to shape standards and processes in a manner that accounts for the types of schools and programs that it accredits. Concordantly, it is important that the Act’s accompanying regulations continue to also provide this flexibility. With regard to the issue of program length in particular, the above overview of the diversity of the higher education community demonstrates the importance of avoiding prescriptive federal regulations that might prevent institutions from meeting the increasing demand for innovation and diversity in the academic programs offered. Moreover, as I pointed out during the Program Integrity Negotiated Rulemaking session, the need for flexibility in regulatory language regarding the definition of a credit hour is important because regulatory definitions, particularly narrow definitions, have the

tendency to become entrenched rules such that creative yet equally effective approaches or even more rigorous approaches are not considered or are seen as suspect. As I demonstrate in the next section of my testimony, the current flexibility in the Higher Education Act has enabled my agency, ACCSC, to write standards and create processes that measure program length and credit hours, and that seek to define program objectives in a manner that makes the best sense for the types of programs and institutions that the agency accredits. The current NPRM regarding the definition of a credit hour would relegate our rather rigorous requirements to an “other” category in the regulations potentially exacerbating the difficulty that students attending our schools already have in the area of transfer of credit.

ACCSC’s Standards and Processes to Evaluate Program Length and Credit Hour

The ACCSC *Standards of Accreditation* and accreditation process emphasize educational quality by focusing on outcomes. What actually happens as a consequence of the teaching-learning processes in a school and what is the evidence of these results? Given the stated purposes of the school and its documented outcomes, can the school be judged as meeting standards of quality compared with similar institutions? Does the accreditation process help the school to evaluate and improve its student achievement outcomes and hence its quality? Such questions are the primary focus of ACCSC as the Commission conducts its work.

Our Standards:

In addition to having standards and processes to examine institutional inputs, ACCSC has outcomes-based standards, including graduation and employment rates, which the agency uses in its assessment process. In short, the Commission is concerned about institutional operations and

how those contribute to student achievement outcomes related to the attainment and application in the workplace of skills, knowledge, and competencies.

Our standards on program length are necessarily linked to our standards on student achievement; none of our standards is utilized in isolation. ACCSC strives for a “whole school” assessment process whereby the appropriateness of an institution’s operational and education inputs can be evaluated in the context of student achievement outcomes. Each component of the school (e.g., admissions requirement and recruiting, program design and curriculum, student services, the quality of the administration and faculty, the inclusion of the employment community in curriculum development and assessment, etc.) has a role to play and an impact on the overall success of an institution and the success of students. In the area of program length and objectives, ACCSC has more than 20 standards that address these areas directly (see Appendices I and II) and several more that do so tangentially.

Our primary standards in this area require our institutions to demonstrate that the length of each of their programs enable students to achieve their learning objectives. In the event a school has programs that vary from comparable programs, our standards require an institution to justify that variant length. As a standard measure for program length, ACCSC uses a straight clock hour to credit our conversion shown below:

Semester Credit Hours:

- One semester credit hour for at least 15 hours of classroom contact; or
- One semester credit hour for at least 30 hours of supervised laboratory/shop instruction; or
- One semester credit hour for at least 30 hours of documented independent study activities; or
- One semester credit hour for not fewer than 45 hours of externship/internship or work-related experience.

- Quarter Credit Hours:
- One quarter credit hour for at least ten hours of classroom contact; or
- One quarter credit hour for at least 20 hours of supervised laboratory/shop instruction; or
- One quarter credit hour for at least 20 hours of documented independent study activities; or
- One quarter credit hour for not fewer than 30 hours of externship/internship or work-related experience.

Outside preparation is not considered in the conversion of clock hours to credit hours. In addition to ACCSC's formula for conversion, institutions are required to comply with applicable state and federal regulations related to clock-to-credit hour conversions.

In addition to these standards, additional standards on program length require:

- Institutions to have an independent program advisory committee review and comment on program length;
- Minimum and maximum credit hour length for degree programs;
- Comparability of distance education to residential programs; and
- A justification and validation for any deviation from established clock-to-credit hour conversions in distance education programs.

Our Processes:

Our standards are only as good as the process by which we measure our institutions against them. We, therefore, have a multistep process by which we look at an institution's program length. To prepare for the re-accreditation process, institutions are required to prepare a Self-Evaluation Report (SER). ACCSC's SER instructions requires institutions to demonstrate how their programs meet our standards, i.e., we require an explanation of how the school has determined that the length of each program offered is appropriate to enable students to achieve the program objectives. Institutions that do not meet our standards, i.e., their program length is not comparable to similar programs, are required to justify their program's length.

Even before our evaluators visit an institution for re-accreditation, ACCSC staff will review the institution's SER and evaluate program lengths against our standards, such as the clock to credit hour conversion formula. When our evaluators visit an institution, they review the institution's response to the SER and make assessments regarding a school's compliance with those standards. Each on-site evaluation team is comprised of an education specialist and occupation specialist who work together to make assessments regarding the appropriateness of a program taking into account the institution's assertions, the review by an independent Program Advisory Committee, student feedback, and student achievement outcomes. If there is an issue presented on program length or on other outcomes measures, such as graduation or employment rates, for example, ACCSC might require the institution to prepare a Program Validation Study, which would require an institution to show that the program is appropriately designed (e.g., program length) to meet the needs of the employment market. If an institution is not able to make this showing, ACCSC has several institutional and programmatic actions available to remediate or correct poor performance.

For institutions seeking initial accreditation, we likewise require them to complete a detailed SER, provide a demonstration of compliance with our program length standards, and undergo an on-site evaluation. If a school is unable to demonstrate programmatic success via student achievement outcomes, the Commission will likely defer granting initial accrediting until a showing of compliance is made or if the institution is unable to demonstrate compliance after given an sufficient opportunity to do so, the Commission will deny the school's application.

Between accreditation cycles, ACCSC has a robust program approval process. Every program offered by an institution must be approved by the Commission before the program can be offered. The program applications require an institution to justify the implementation of a new

program, show that the curriculum and length has been reviewed by an external employment community Program Advisory Committee, and show that the program meets ACCSC's clock hour to credit hour conversions.

Connection to Student Achievement:

As I have stated, we believe that the evaluation of program length is linked to our evaluation of student learning and outcomes at an institutions. We therefore tightly align our student achievement standards to the program objective standards, including program length, at our institutions. We view our graduation rate and employment rate benchmarks as tools to identify issues, such as inappropriate program length or objectives, and to then develop institutional improvement objectives as a means to enhance institutional and student success. I include Appendix II for further detail of our student learning and achievement outcomes standards.

In the area of student learning and achievement outcomes, ACCSC requires that:

- Student learning outcomes for each program are consistent with the program objectives and meet any relevant academic, occupational, or regulatory requirements;
- Student learning outcomes for each program are aligned with the program's objectives, the occupational area of study, and with the level of education intended (e.g., non-degree, degree, degree level);
- Student learning outcomes for each program reflect the necessary occupational and academic knowledge, skills, and competencies as applicable;
- The school has a developed and structured process to assess and evaluate the defined student learning outcomes;
- The school must demonstrate successful student achievement by documenting through its assessment practices that students are acquiring the knowledge, skills, and competencies intended by the program objectives; and

- The school must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education.

Conclusion:

ACCSC believes that its standards represent exemplary practices in the areas of program length, program objectives, and student achievement measures for the kinds of institutions it accredits. ACCSC does not intend to suggest that its standards could or should be applied to every institution of higher education, but instead to show that rigorous standards can be and have been developed in the areas being addressed by this hearing. ACCSC's standards work because they have been developed in a peer review environment that is committed to institutional and student success. Accreditors can and should continue to be relied upon to establish these standards in conjunction with their institutions keeping in mind the best interest of students. Thus, federal law and regulation should also continue its historical reliance on professional accreditors to make the appropriate assessments with its institutions and to refrain from overly prescriptive requirements that may, albeit unintentionally, stifle flexibility and innovation.

APPENDIX I

ACCSC PROGRAM LENGTH AND OBJECTIVES STANDARDS

The length of each program offered by the school is appropriate to enable students to achieve the program objectives and to acquire the knowledge, skills, and competencies necessary for initial employment in the field for which training is provided. Schools that have or apply for programs that appear to be significantly shorter or longer in clock or credit hours than comparable programs (i.e., within the same field of study) will be required to justify the appropriateness of the program length (Section II (A)(2)(a), Substantive Standards, Standards of Accreditation).

For every program, there are detailed and organized instructional outlines and course syllabi showing a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies. Programs include the appropriate number of lecture hours and, as applicable, the appropriate number of laboratory/shop and/or externship hours necessary to achieve the program objectives (Section II (A)(2)(b), Substantive Standards, Standards of Accreditation).

Each school must have an independent Program Advisory Committee for each program area, and the committee reviews and comments at least annually on the established curriculum of the program and comments as to the appropriateness and adequacy of the program objectives, program length, curriculum content, learning resources, and the adequacy of facilities and equipment (Section II (A)(5)(e)(i), Substantive Standards, Standards of Accreditation).

Degree programs are measured in semester credit hours or the equivalent quarter hours (refer to the Profile of Clock Hour to Credit Hour Conversion form), include the appropriate number of lecture hours and, as applicable, the appropriate number of laboratory and/or externship hours necessary to achieve the program objectives. Degree programs must be comprised of courses with content that is appropriate to the level and type of degree awarded (Section II (B)(1)(b), Substantive Standards, Standards of Accreditation).

An associate degree program must be a minimum of 60 semester hours or 90 quarter hours and a minimum of two academic years. Associate degree programs may not exceed by more than 50% the minimum number of credit hours required to confer the degree by the appropriate regulatory agency in the state(s) in which the school operates. If such minimums have not been established, then generally accepted practices in higher education shall apply. (Section II (B)(2)(b), Substantive Standards, Standards of Accreditation).

A baccalaureate degree program must be designed and offered in a way that appropriately balances distinct types of education and training (i.e., technical and occupationally related courses and general education courses) and distinct levels of education and training (i.e., lower level and upper level courses), and must include a comprehensive curriculum with appropriate coursework to achieve the program objectives. (Section II (B)(3)(a), Substantive Standards, Standards of Accreditation).

A baccalaureate degree program must be a minimum of 120 semester hours or 180 quarter hours and a minimum of four academic years. Baccalaureate degree programs may not exceed by more than 50% the minimum number of credit hours required to confer the degree by the appropriate regulatory agency in the state(s) in which the school operates. If such minimums have not been established, then generally accepted practices in higher education shall apply (Section II (B)(3)(b), Substantive Standards, Standards of Accreditation).

The length of a master's degree must be appropriate to enable students to achieve the required competencies and skills for employment or advancement in the field for which training is provided (Section II (B)(4)(b)(i), Substantive Standards, Standards of Accreditation).

A master's degree program must be designed and offered in a way that provides for a distinct level of education and fosters independent learning and an understanding of research methods appropriate to the academic discipline. Graduate level courses must be based on appropriate pre-requisites and learning outcomes and expectations must be clearly stated to students (Section II (B)(4)(b)(ii), Substantive Standards, Standards of Accreditation).

Master's degree programs must include a minimum of 30 semester hours or 45 quarter hours. At least 24 semester hours or 36 quarter hours must be in the technical field for which the degree is awarded (Section II (B)(4)(b)(iii), Substantive Standards, Standards of Accreditation).

ESL program length must be between 600 and 900 clock hours or the equivalent credit hours (Section II (C)(2)(f), Substantive Standards, Standards of Accreditation).

The length of the distance education programs and courses of study must meet all necessary requirements outlined in Section II (A)(1), Substantive Standards, Standards of Accreditation (Section IX (C)(1), Substantive Standards, Standards of Accreditation).

The school must demonstrate that the content and length of a distance education program or course of study are comparable to residential programs. The school must justify and provide validation for any deviation from established clock-to-credit hour conversions, if applicable (Section IX (C)(2), Substantive Standards, Standards of Accreditation).

APPENDIX II

ACCSC STUDENT LEARNING AND ACHIEVEMENT STANDARDS

Student learning outcomes for each program are consistent with the program objectives defined by the institution's program design and development process and meet any relevant academic, occupational, or regulatory requirements (Section VII (A)(1)(a), Substantive Standards, Standards of Accreditation).

Student learning outcomes for each program are aligned with the program's objectives, the occupational area of study, and with the level of education intended (e.g., non-degree, degree, degree level) (Section VII (A)(1)(b), Substantive Standards, Standards of Accreditation).

Student learning outcomes for each program reflect the necessary occupational and academic knowledge, skills, and competencies as applicable (Section VII (A)(1)(c), Substantive Standards, Standards of Accreditation).

The school has a developed and structured process to assess and evaluate the defined student learning outcomes of the education and training and established competencies (e.g., the application of knowledge and skills to the standard of performance articulated in the program objectives and as expected in the workplace). This process may include a variety and combination of methods such as grading, portfolio assessment, and criterion referenced testing based on developed and appropriate rubrics (Section VII (A)(2)(a), Substantive Standards, Standards of Accreditation).

The school demonstrates successful student achievement by documenting through its assessment practices that students are acquiring the knowledge, skills, and competencies intended by the program objectives (Section VII (B)(1)(a), Substantive Standards, Standards of Accreditation).

The school demonstrates successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education. The school supports these rates through student transcripts, the school's verifiable records of initial employment of its graduates, or other verifiable documentation (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation).

ACCSC STUDENT ACHIEVEMENT BENCHMARKS

ESTABLISHED BENCHMARK GRADUATION RATES			
Program Length in Months	Average Rates of Graduation Demonstrates Acceptable Student Achievement	Standard Deviation	Established Benchmark Graduation Rates*
1-3	92%	8%	84%
4-6	82%	13%	69%
7-9	69%	14%	55%
10-12	69%	15%	54%
13-15	61%	16%	45%
16-18	59%	17%	42%
19-24	56%	20%	36%
25-35	55%	22%	33%
36+	47%	15%	32%

*If a school reports a lower graduation rate for a program, that program will be subject to additional monitoring or reporting as deemed appropriate.

ESTABLISHED BENCHMARK EMPLOYMENT RATE			
	Average Rate of Employment Demonstrates Acceptable Student Achievement	Standard Deviation	Established Benchmark Employment Rate*
All Programs	82%	12%	70%

*If a school reports a lower employment rate for a program, that program will be subject to additional monitoring or reporting as deemed appropriate.