

**STATEMENT OF  
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SUBCOMMITTEE ON HIGHER EDUCATION  
AND WORKFORCE TRAINING  
COMMITTEE ON EDUCATION AND THE WORKFORCE  
U.S. HOUSE OF REPRESENTATIVES**

Keeping College Within Reach:  
Discussing Program Quality through Accreditation

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Good morning Mrs. Chairwoman, Mr. Ranking Member and Members of the Subcommittee. Thank you for this opportunity to testify today on the important role regional accreditors play in ensuring quality in our nation's system of higher education.

For the past four years, I have served as the President of the Middle States Commission on Higher Education, where I spent the prior nine years in a variety of other positions. I am also the current Chair of the Council of Regional Accrediting Commissions, which coordinates and advocates on behalf of regional accrediting commissions.

Reflecting my own experience and background with MSCHE as well as the broader perspective of regional accreditors collectively, I will focus my testimony today on four key areas. Specifically, the structure of regional accreditation; the process used by accreditors in recognizing institutions; recent ways in which regional accreditation has responded to the changing landscape of higher education; and finally, an overview of some of the key challenges facing regional accreditors.

I would like to begin by explaining the value of accreditation. Simply put, accreditation is the way in which colleges and universities give the public confidence that they provide a quality education. It is for this reason accreditation is used by the federal government as a key requirement for participation in federal student aid programs; employers use accreditation for evaluating the education credentials of prospective employees and for decisions regarding tuition reimbursement programs; and colleges and universities use accreditation as a means for determining the quality of other institutions for purposes of determining transfer-of-credit policies.

Just as important is the fact that accreditation is a critical tool used by colleges, universities, and other institutions of higher education to sustain and strengthen their quality as part of a process of continuous improvement. Institutional improvement has been a core aspect of regional accreditation since its founding a century ago.

**Structure:**

The Middle States Commission on Higher Education (MSCHE), as with each regional accreditor, is a private, voluntary, non-governmental, membership association that defines, maintains, and promotes educational excellence and improvement. Regional accreditors accredit entire institutions, not individual programs, units, or locations. Regional accreditors also require that undergraduate programs (if the institution offers any) include a significant general education or liberal studies component.

MSCHE is one of seven Commissions across six regions. The Western Association of Schools and Colleges is unique in that it maintains separate commissions for senior and junior colleges.

A professional staff oversees each Commission while over 3,500 volunteers carry out the work of accreditation by serving on visiting teams and on commissions. These volunteers include college and university presidents, academic officers, faculty, and campus experts in finance, student services and library/technology. At least one of every seven

Commissioners is required to be a public member, although some Commissions have a higher ratio of public members and find they provide valuable insight into ensuring that accreditation is relevant.

Collectively the seven Regional Commissions accredit over 3,000 institutions, which include public, private non-profit, and private for-profit entities. The range of institutions in each region includes, but is not limited to, community colleges, liberal arts colleges, special-purpose institutions such as seminaries and medical schools, research universities, and institutions with on-line programs serving every state of the nation. These institutions have diverse missions, student populations, and resources and enroll over 17 million students in programs ranging from associates through doctoral degrees

Each regional accreditor must be recognized by the U.S. Secretary of Education as a reliable authority on the quality of education and training provided by the institutions of higher education that it accredits. Acquiring this recognition involves each agency undergoing a review by U.S. Department of Education staff, which provides recommendations to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) – a committee with Members appointed by Congress and the U.S. Secretary of Education. Accreditors must also appear before NACIQI, which in turn advises the Secretary regarding recognition.

Recognition is based upon criteria set forth under the Higher Education Act (HEA) and through significant regulations. In fact, under the USDOE's *Guidelines for Preparing/Reviewing Petitions and Compliance Reports*, we are subject to roughly 100 separate requirements as part of the recognition process. Among these criteria is the requirement that accreditors maintain certain standards that must be used in quality reviews. In particular, accreditors must ensure they have standards that assess an institution's success with respect to student achievement in relation to the institution's mission, curricula, faculty, facility, equipment and supplies, fiscal and administrative capacity, student support services, recruiting and admission practices, measure of program length, and record of student complaints, as well as record of compliance with

its program responsibility under Title IV of HEA. All institutions – public, private not-for-profit, private for-profit – are evaluated using standards that are generally the same.

For an institution, accreditation by an agency recognized by the Secretary provides an assurance of education quality and is necessary in order to participate in federal student financial aid programs. However, the Department of Education and individual states also have distinct roles in ensuring quality in higher education. Under this “Triad” as it is referred to, states ensure a process for addressing consumer complaints and the federal government oversees financial responsibility and administrative capability of institutions.

**Process:**

Within this overall structure, each regional accreditor uses a similar process for accrediting institutions. The MSCHE’s process includes several distinct steps, which can take several years to fully complete, reflecting the need for regional accreditors to hold true to their obligation to serve as a reliable authority of quality. These steps toward initial accreditation include:

***Deciding whether to apply and whether to make institutional changes:***

This is an initial period of inquiry during which the institution has an opportunity to learn about and judge its position relative to MSCHE requirements and expectations.

***Submitting an application that demonstrates eligibility for accreditation:***

Demonstration of eligibility for accreditation involves the presentation of documentation and analysis showing the institution's current or potential compliance with accreditation standards. At this stage, MSCHE staff conduct an initial review and determination of the institution's capacity to demonstrate sustained compliance.

***Commission staff visit:***

The Commission staff visit provides an opportunity to confirm the institution's readiness to continue the accreditation process successfully and to discuss, with the institution's constituencies, the next steps in that process.

***Applicant assessment team visit***

The applicant assessment team visit allows for a validation of the information that has been submitted to MSCHE and a determination via peer review as to whether the institution is ready to be granted candidate-for-accreditation status by the Commission.

***Updated accreditation readiness reports and candidate progress visits***

These reports and candidate progress visits are employed if the Commission does not immediately invite the institution to initiate self-study when it grants candidacy. This interim period allows the institution time to focus on issues where work may be required to ensure sustainable compliance with standards for accreditation.

***Self-study and the evaluation team visit***

The self-study and evaluation team visit are the final steps in candidacy wherein the institution prepares its first self-study and hosts a full evaluation team visit.

***Becoming accredited***

This is the action taken by the Commission following a successful self-study and peer-evaluation process.

Once accredited, institutions are monitored by the Commission to ensure on-going compliance and within the context of reaffirmation of accreditation. While there is variation among regional processes, MSCHE works within a decennial time frame that includes two main accreditation events that result in accreditation decisions in the first year and in the fifth year.

MSCHE uses a three-stage decision-making process both for initial accreditation and for reaffirmation of accreditation. In the first stage, peer reviewers consider reports and evidence presented by the institution and develop an action recommendation. A second-stage review happens in one of the Commission's standing committees. This review allows for a look across a number of similar reviews and gives us a mechanism for considering consistency and fairness in the decisions that have been made. Adjustments are possible as the committee then makes its action recommendations to the full Commission. The final stage of review rests with the full Commission, which can make further adjustments in reaching a final accreditation action.

In addition to these two main accreditation events, MSHCE also reviews institutions through annual data submission via an Institutional Profile. Through this process, the Commission may identify instances where additional follow-up may be necessary.

In addition, we maintain ongoing contact with our institutions in a variety of other ways. This includes receiving from them follow-up reports from reviews and substantive change requests related to such issues as the addition of new branch campuses or additional teaching locations.

Increasingly, we find the need to work with institutions upon learning about significant developments such as new financial issues or other matters that have drawn serious attention by media or in cases where we learn of complaints or third-party comments about the institution.

It is especially important to emphasize that, in cases where an institution is not meeting our standards or is in danger of non-compliance, as identified as part of a scheduled review or on-going monitoring, the Commission takes action requiring the institution to report back to us.

If warranted, a special visit by an evaluation team at the institution will be scheduled. The team will report back to the Commission, which will then take action as may be

warranted. The range of actions may include steps toward termination of accreditation if necessary. To give you a sense of how often we must take such steps, in 2012, 18 percent of our institutions were placed on warning following a self-study; 10 percent were placed on warning after a periodic review; after follow up, 4 percent of warnings were continued and 1 percent were placed on probation.

Clearly, terminating accreditation is a last resort and has serious implications for institutions and students alike. For this reason we devote substantial time and energy in working with institutions from the very beginning to help prevent terminations and to identify and respond to issues through monitoring and oversight before they result in serious problems.

The accreditation status of an institution – particularly in cases where there has been a sanction – is critical information for the public and especially students to know and be aware of. For this reason, accreditors are also responsible for disclosing the accreditation status of reviewed institutions. This responsibility includes providing such information as current status, including sanctions imposed and reasons for the sanctions and requested monitoring reports. In addition to the status being posted on our own websites, this information is also provided to the U.S. Secretary of Education and posted on the U.S. Department of Education’s website.

## **Accreditation 2.0**

Higher education today is far different than when our Commission first began its work nearly 100 years ago. Indeed, the landscape has changed dramatically in just the last 10 years, with the explosive growth of new modes of delivering education; increased numbers of institutions providing services, especially in the for-profit sector; and a comparatively large amount of spending on higher education – both by the federal government and through family financing.

This evolution in higher education shows no sign of slowing, as evidenced by the advent

of Massive Open Online Courses (MOOCs), which are driving new pathways and partnerships to a degree I have never seen in all of my years in higher education.

Just as all of higher education is changing, so too is regional accreditation. Today, our practices and policies are vastly different from what they were a decade or even five years ago. These changes have been critical for many reasons, including enabling us to keep up with the changing nature of the delivery of education; to maintaining proper oversight of increasingly complex fiscal management systems; and to meeting a growing demand by policymakers and the public for increased transparency and for a focus on outcomes in higher education.

Below are just a few examples of what regional accreditors are doing to meet the new demands in our changing landscape:

***Promoting Innovation in Educational Programs:***

Regional accreditors are working with institutions to enable them to deliver degrees in ways that increase access and affordability while ensuring and improving outcomes. For example:

- At MSCHE, we are in discussion with several institutions that are eager to explore approval for competency-based/direct assessment programs.
- Meanwhile, this past year, the New England Association of Schools and Colleges (NEASC) approved what is widely viewed as a landmark program at Southern New Hampshire University which will provide access to federal financial aid for a degree program offered without credits or semester terms – a so-called “direct assessment” program -- making these programs more accessible, affordable and focused on outcomes. That program has now been approved by the U.S. Department of Education for participation in federal financial aid programs.



- NEASC is also focusing on the role of accreditation in considering “credits from elsewhere” – credits that students bring with them or credits that institutions recognize or validate for non-collegiate study. This will lead to a discussion of the institution’s responsibility to assure the quality of anything for which it awards, recognizes or accepts credits (e.g., Straighter Line, MOOCs, competencies, prior learning assessments).
- The Higher Learning Commission (HLC), which accredits institutions throughout the Midwest and as far west as Arizona, has moved forward with a pilot program to enable institutions to authorize the offering of competency-based programs as a means of reducing the time required to complete a degree and the cost.
- The Southern Association of Colleges and Schools (SACS) recently received its first proposal for a competency-based program, and will be convening a task force to examine the relevant issues in more detail.

***Streamlining the Accreditation Process:***

As accreditors, we recognize that certain aspects of the accreditation process have historically been viewed as over-burdensome and costly – both financially and in terms of staff time and effort. While the level of burden is in part due to federal laws and regulations, more is being done to streamline the accreditation process and improve the benefits to institutions:

- At MSCHE, we are renewing our accreditation process, including looking at ways to change aspects of our 5<sup>th</sup> year reporting in order to streamline that activity.
- The Higher Learning Commission (HLC) is in the process of transitioning one of its current programs for maintaining accreditation into two new Pathways--the Standard Pathway and the Open Pathway--both of which would reduce the reporting burden on institutions by collecting as much information and data as possible from existing institutional processes and in electronic form as they

naturally occur over time.

- The Northwest Commission on Colleges and Universities (NWCCU) has shortened its accreditation cycle from ten years to seven years. The foci and requirements of the Commission's new accreditation reports streamline the process without compromising the rigor or value to institutions and the Commission. The process is more strategic, analytical, and outcomes-based and is driven by an institution's own stated mission, core themes, and objectives.

***Increasing the Transparency of the Accreditation Process:***

We believe it is critical for students to understand the accreditation status of the institution they attend or are considering attending. However, there has been a growing demand for more information going beyond just the current accreditation status of an institution, and the regional accreditors have reacted by developing new ways in which to increase transparency.

- For example, MSCHE posts a significant amount of information on our website about the specific areas where individual institutions have required follow-up.
- The Accrediting Commission for Community and Junior Colleges (WASC/ACCJC) now requires all member institutions to post their self-evaluation report, the evaluation team report, and any Commission action letters online.
- The Western Association Schools and Colleges Accrediting Commission for Senior Colleges and Universities ("WASC Senior") has, since last year, posted all team reports and Commission action letters on its website, and the postings also include a link to any institutional response.
- Beginning this month, SACS will initiate a process of posting a form of disclosure for all institutions following their reaffirmation actions which will include areas

of continued monitoring if applicable.

***Enhancing Focus on Student Outcomes:***

Assessing student outcomes is central to the work of accreditors. In addition, we also recognize the growing demand on the part of policymakers, students, and the public for more information about the extent to which individual institutions are successful in such areas as retention and graduation. In just the last few years, regional accreditors have devoted a significant amount of time and effort to this issue, including:

- At MSCHE, I have seen an increased demand on the part of our institutions for assistance with more sophisticated ways to improve student learning outcomes assessments, and we have met this demand through an extensive schedule of workshops.
- NWCCU has developed a new accreditation model that is outcomes-based and emphasizes outcomes in the Year One, Year Three and Year Seven Reports and evaluations.
- Since 2011, NEASC has required institutions to discuss “what students have gained as a result of their education” as part of their fifth-year interim report. In addition, institutions must report (in both the comprehensive evaluation and the fifth-year interim report) retention and graduation rates, licensure passage rates, and the rates at which students go on to higher degrees.
- For the past five years, many NEASC institutions have agreed to display retention and graduation rates for part-time students, transfers and on-line students. This goes beyond the information on first-time, full-time students currently collected by the Integrated Postsecondary Education Data System (IPEDS). This month NEASC is convening a meeting to develop consensus on what retention and graduation rates are most useful for non-first-time-full-time students.

- WASC/ACCJC is now asking institutions to report annually on institution-level student achievement data and student learning outcomes data, and is monitoring this information, which comes from the institutions' annual reports.
- WASC Senior has undertaken several initiatives focused on outcomes and quality. Included among these initiatives is a new process to evaluate retention and graduation data, going beyond the first-time, full-time data. WASC is also requiring all institutions to address the meaning, quality, and integrity of their degrees so as to ensure that they are coherent and are supported by effective quality assurance processes. In addition, institutions awarding undergraduate degrees will be expected to demonstrate, using their own approaches, graduation proficiencies in the major and in at least five key areas: written communication, oral communication, critical thinking, quantitative reasoning, and information literacy.

***Improving On-going Monitoring of Institutions:***

While ongoing monitoring has always been a component of accreditation, as I have outlined above, the increased complexity of higher education – particularly related to financial information -- has demanded we do more.

- Our Commission has expanded its fiscal monitoring of all member institutions. Each year, financial data and audited financial statements are collected and analyzed using ratios, some of which were developed by KPMG. In cases where the analysis reveals a concern, the Commission reaches out to the institution for additional information that may subsequently, depending on the situation, be considered by the Commission or one of its committees.
- WASC Senior has begun using specially trained finance teams who review audits and financial ratios every three years to identify financial issues, in addition to conducting annual reviews of institutional audits.

The examples I have just outlined point out the significant work regional accreditors are doing to respond to the changing landscape of higher education. However, these examples also point out the value of the “regions” being able to test new approaches and to build upon the best practices developed elsewhere.

### **Challenges:**

While MSCHE and other regional accreditors have been working hard to improve accreditation, it is worth noting a few key areas that are illustrative of the challenges we face.

#### ***Explaining Accreditation as it Exists Today:***

Higher education accreditation is a complex undertaking that has evolved significantly, especially during the past decade. This testimony has included descriptions of some of the ways that regional accreditors have embraced change. We don’t often have an opportunity to discuss this aspect of our work, and it is difficult to summarize in a few words or phrases. Continuing to spread the word about what accreditation is and what it does best represents a serious challenge. If there is a single message in this regard that I would leave you with today, it is that academic communities – through the vehicle of non-governmental, voluntary peer/membership-based accrediting agencies - continue to provide the most effective way to evaluate quality and effectiveness in higher education.

#### ***Addressing Dilemmas in Accreditation:***

Regional accrediting agencies face numerous dilemmas in the current environment. How can we expedite accreditation activity while remaining thorough and careful in what we do? How can we move to quickly sanction a substandard institution while still providing appropriate due-process protections? How should we balance the competing needs for thorough review and review that is cost-effective? How should we best promote the use of data and evidence in self-study and review without relying on the wrong metrics, becoming too prescriptive, or stifling creativity and diversity? MSCHE and the other regional commissions are well aware of issues like these. Addressing them appropriately represents a continuing challenge.

***Safe Space for Innovation within Accreditation:***

This country's higher education community stands at a crossroads where such issues as cost, value, and access must be and are being addressed in a variety of ways. Innovations in technology and delivery are changing the face of higher education, yet it is often difficult for accreditors to allow innovative practices and at the same time remain within the boundaries of federal regulations. This challenge might be addressed by explicitly allowing accreditors to develop demonstration or pilot programs that would not put recognition of the agency in jeopardy.

***Regulations:***

While a certain level of regulation of accreditors is understandable given our role as "Title IV gatekeepers," we have become increasingly concerned with the steady flow of increased regulations that often seems to approach constant regulatory change. New regulations, such as those focusing on defining "credit hour" and involving new rules on "state authorization," have created significant burdens and challenges for institutions and accreditors alike while at the same time providing questionable real benefits for students and the public at large.

***Effective Collaboration:***

The Department, regional and specialized accrediting agencies, and state governments all have roles in reviewing and recognizing institutions of higher learning. Understanding separate roles and finding appropriate pathways for communicating and sharing information are especially important in this time of transition. However, sustaining collaborative relationships is a challenge and does not always happen.

**Conclusion**

I have spent most of this testimony explaining what accreditation is, how it works, and the many ways in which we are striving to improve. However, accreditation is far from perfect, and there is always room for improvement. As this Subcommittee moves

forward with efforts to reauthorize the Higher Education Act, we welcome the opportunity to work with you on ways not only to improve accreditation but to ensure that our system of higher education in this nation remains second to none.