



# A Seal We Can Trust

## How to Improve the College Accreditation System to Guarantee Quality for Students and Taxpayers

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### Introduction and summary

What makes a college a college? These days, anyone with a decent computer can design a fancy seal with a phrase like “Ever to Excel” or “The Way, the Truth, the Light” on it in Greek or Latin and start printing diplomas. And with the advent of online education, a college can flourish without an ivy-covered campus—or any campus at all. If the traditional marks of legitimacy—a campus, a library, dozens of students wandering around in “University of” sweatshirts—are not reliable, students need another symbol of whether an institution is providing a quality educational experience. And the federal government needs a way to distinguish between universities that will be good stewards of financial aid dollars and those that will not.

In the past, students, policymakers, and institutions relied on accreditation to distinguish good colleges from bad ones. Accrediting agencies devise standards for colleges and employ a system of self-study and peer review to determine whether educational institutions are worthy of their seal of approval. The tradition of accreditation was so established as a measure of quality that Congress adopted accreditation as a precondition for institutions seeking to participate in federal student aid programs.

Today, however, accreditation is not so revered. Since the 1992 amendments to the Higher Education Act there have been rumblings in the policy world that accreditors are not the custodians of college quality they were thought to be. And the recent attention to accredited for-profit colleges brings the weight of evidence to that assertion, with figures like a 9 percent graduation rate for bachelor’s degree programs at University of Phoenix and a 69 percent withdrawal rate at Kaplan colleges.<sup>1</sup>

If the accreditation system is not broken then how can such institutions still be operating with accredited status and the access to federal dollars that accompanies it?

Accreditation is a hugely important issue in federal higher education policy. First, it is a gateway to federal financial assistance. But it fails to protect the federal investment through both overinclusiveness and underinclusiveness. Accreditors allow institutions with alarmingly low graduation rates or high student loan default rates to persist in accessing financial aid yet they act as a barrier to innovative education providers who do not fit the standard model of “what a college should look like.”

And second, accreditation is one of the primary measures of consumer protection in higher education. Yet when accreditors give their seal to colleges that provide little value, students are unprotected, and they are led to believe that these underperforming institutions are of equal quality to other colleges and universities.

Many organizations weighed in on the accreditation problem in the past several years. In fact, the U.S. Department of Education’s National Advisory Committee on Institutional Quality and Integrity, or NACIQI—a group charged with approving accrediting agencies and suggesting changes to the federal requirements placed upon them—convened a group of experts in February and another in June to discuss the future of accreditation and the role of the federal government. The experts offered some suggestions that will greatly improve accreditation. But there are some additional steps that should be taken to sufficiently assess college quality and to ensure that accreditors meet the government’s needs.

This brief describes what accreditation is and the flaws inherent in the system. It argues that the best accreditation system is one that recognizes and meets the federal government’s needs for both quality assurance and continuous quality improvement. It is also one that borrows from service quality theory by considering how students interact with colleges—the processes, their expectations, and their perceptions of quality—when evaluating the overall quality of an institution.

In the last reauthorization of the Higher Education Act, Congress responded to concerns about the quality of higher education by charging the Department of Education’s NACIQI committee with making recommendations on how to change the accreditation system. We recommend that NACIQI suggest the following changes to Congress’s requirements for accrediting agencies to promote better institutional quality for students and protect taxpayers’ investments in higher education:

- Congress should require that accreditors clarify the standards they employ for continuous quality improvement. It should also require that these standards include measures to increase colleges’ productivity and decrease the price of education to maximize its value.
- Congress should also require that accreditors identify benchmarks for quality improvement and measure their progress at helping colleges improve based upon these benchmarks.

- Congress should require that accreditors create more stringent standards for quality assurance by setting standards for student learning outcomes with clear cutoffs below which colleges lose their accredited status.
- Congress should require that accreditors incorporate measures of service quality that evaluate how students respond to the services offered by colleges, including measures of student satisfaction.
- Congress should require greater transparency from accreditors in the following ways:
  - Accreditors should make the reports from their site visits available to the public so that policymakers can assess whether other changes are necessary in the accreditation process and so that interested consumers can take a deeper look at how colleges measure up.
  - Accreditors should make available to the public the metrics they use to evaluate colleges, including student learning measures, employment rates, and student satisfaction rates. These should be available separate from accreditor's reports, and the Department of Education should ensure that the information is available in a consumer-friendly format.

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## Determinations of quality matter

Determinations of quality can be enormously helpful to consumers, especially when they come from a professional familiar with a product or service. Consumers rely on these determinations when they do not have the expertise or the access necessary to judge quality for themselves.

For instance, many rely on the American Dental Association's seal of approval when buying a tube of toothpaste. Toothpaste companies proudly display this seal and feature it in their advertisements. Consumers do not really know what it takes to be approved. All that matters is that ADA approval signals a quality dental product, and by relying on the seal, consumers can rest assured that they are choosing a toothpaste or toothbrush that will help and not harm them. They are then free to make choices among a variety of options based on preferences like flavor, whitening power, and dispenser style.

Now imagine there are many different seals of approval the next time you buy toothpaste. In addition to the ADA, there's a CDA, the Council of American Dentists; an NDA, the National Dentists Association; and even a CED, the Committee for Excellent Dentistry. As a consumer, you probably just want to buy a tube of toothpaste relatively quickly and feel good that a professional approves of it.

But do these organizations all adhere to the same standards as the ADA? Or do some use higher or lower standards? And should you really be expected to know the difference?

Let's say you relied on the NDA seal only to find your teeth riddled with cavities. But the NDA claims it's not to blame because it's not really interested in certifying good toothpastes but in helping the companies it works with become better toothpaste providers.

Now, it may *slightly* mitigate the circumstances if the NDA, CED, and ADA all let consumers see the technical reports they write up when evaluating each brand (assuming you had the time to read them). But what if they won't even do that?

Well, then they'd be exactly like higher education accrediting agencies.

At least 10 different bodies accredit higher education institutions, and each uses a different set of standards to do so. Though the accreditors give each institution their "seal of approval," they claim to be mostly in the business of continuous quality improvement rather than rubber-stamping institutions based upon their quality at any given point in time. And accreditors conduct largely confidential reviews of organizations that focus on the resources the institutions possess rather than the learning its students achieve.<sup>2</sup> Resources can give some indication of quality, but they do not tell the whole story.

If the above example sounded like a silly system for approving toothpastes, it's even sillier for higher education because consumers rely on that system, and the federal government uses it to determine which colleges are deserving of its student aid. With so much riding on accreditation, policymakers are wondering whether the system can be fixed so that it works better for students and taxpayers.

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### What is accreditation, anyway?

Accreditation is a process of evaluating postsecondary institutions based upon defined standards. Postsecondary accreditation's purposes are quality assurance and quality improvement.

Of course, there are many different ways to define quality. According to the Council for Higher Education Accreditation, accrediting agencies base their judgments of quality on the institution's mission. For instance, the New England Association of Schools and Colleges' Commission on Institutions of Higher Education states that successful institutions have clearly defined purposes, the resources to achieve those purposes, and are in fact achieving their stated purposes.<sup>3</sup>

There are technically two distinct types of accreditation: program accreditation and institutional accreditation. Institutional accreditation is a general seal of approval for the entire institution, while program-level accreditation is a more thorough review of the quality of a particular educational program (e.g., nursing).

A committee affiliated with the leading professional organization in a particular field typically performs program-level accreditation. Most colleges pursue institutional accreditation and only seek program-level accreditation when students in that program must attend an accredited program as a prerequisite to practice within a field. For instance, most law schools pursue accreditation by the American Bar Association's Accreditation Committee because attendance at an accredited school is necessary for admission to the bar in many states.

Institutional accreditation is the precursor for participation in federal student loan and grant programs (more detail on this below). This paper focuses on institutional accreditation since it is primarily concerned with the federal policy implications of accreditation.

### How it works

Institutional accrediting organizations generally have both a permanent staff and a commission or other decision-making board that consists of persons elected by member institutions. The decision-making bodies are comprised primarily of academics and administrators from member institutions, along with a few public representatives. The organizations set their own standards for accreditation and evaluate institutions according to these standards.

Each institution must undergo an initial evaluation and subsequent follow-ups over the years (typically every 10 years). Evaluations consist of a self-study in which an institution examines how its programs and operations measure up to the accreditor's standards and a team visit in which a group of faculty members and administrators designated by the accrediting agency performs its own evaluation of the institution through interviews and document review.

### Why do institutions pursue accreditation?

Accreditation is a voluntary process. So why do colleges and universities volunteer for such scrutiny? There are a few possible reasons.

The accreditation process certifies the quality of institutions or academic programs and provides guidance to them on continuous quality improvement, according to the Council on Higher Education Accreditation, an organization that promotes the use of voluntary accreditation in the United States. Some institutions may get accredited to receive technical assistance in their pursuit of quality. But it's likely that most colleges and universities pursue accreditation for the accreditor's seal of approval.

That's because this rubber stamp of quality helps institutions attract students and signals the legitimacy of an academic degree to potential employers. A student's attendance at an accredited institution also often serves as a precursor to further graduate education or entry into certain professionalized fields. In addition, accreditation encourages the transfer of credit from one institution to another. In fact, the original purpose of accreditation was to help colleges determine the quality of the education received by students who migrated from other colleges or schools.

Finally, accreditation's most tangible benefit is likely the access it provides to federal funding. Accreditors that are recognized by the U.S. Department of Education serve as gatekeepers to federal financial aid programs. Colleges and universities who seek to offer federal student loans, Pell Grants, or other aid programs to their students must be approved as quality institutions by an accrediting agency.

### Standards of accreditation

There are many similarities among the standards employed for accreditation even though each accrediting agency may determine its own. As mentioned earlier, accreditors base their quality decisions on the institution's mission. To be recognized by the Department of Education, however, accrediting agencies must also maintain standards pertaining to the following aspects of postsecondary institutions:

- Success with student achievement
- Curricula
- Faculty
- Facilities and equipment
- Fiscal and administrative capacity
- Student support services
- Recruitment and admissions practices, academic calendars, catalogs, publications, grading, and advertising
- Measures of program length and objectives of the degrees or credentials offered
- Record of student complaints
- Record of compliance with Title IV responsibilities<sup>4</sup>

Accrediting agencies comply with the federal requirements but stay true to the centrality of the institutional mission by evaluating each of these areas based upon how well the institution's progress in that area comports with its mission.

For instance, the New England Association of Schools and Colleges' standards for higher education accreditation include requirements for organization and governance that begin with: "The institution has a system of governance that facilitates the accomplishment of its mission and purposes and supports institutional effectiveness and integrity."

And the Western Association of Schools and Colleges' standard on achieving educational objectives starts with: "The institution achieves its institutional purposes and attains its educational objectives through the core functions of teaching and learning, scholarship and creative activity, and support for student learning and success."<sup>5</sup>

Two observations about the standards accreditors use are relevant to this paper. First, though the agencies' standards for accreditation do not dictate any particular form for a college—aside from the idea that it should have a faculty and a curriculum—they leave much to the discretion of the site visitors and the accreditation commission or board.

The wide discretion means that accrediting agencies can have inconsistent results. Some colleges find accreditation to be an excellent experience that pushes them toward improvement while others recount stories like NACIQI committee member Wilfred McClay's experience in which an accreditor inexplicably required his institution to change its mission statement because it was too old.<sup>6</sup> And colleges that offer unique or innovative educational programs that do not look like what we generally think of as "college"—for example, institutions that offer courses based upon competencies, not credit hours, or those that do not have a physical campus—have difficulties with the accreditation process, possibly because accreditors are more suspicious of educational delivery forms that look so different from the norm.

The second observation is that the standards accreditors use do not lend themselves to bright-line cutoffs or a yes/no choice on whether to accredit a college.

The method accreditors use for determining quality of an institution, or whether that institution merits the gold seal of accredited status, is more like the way professors grade papers than it is the way a car manufacturer determines whether an automobile is safe to drive. Professors have criteria for judging term papers, but students often don't have any indication of what separates a D from an F. And they may even get the sneaking suspicion that factors like randomness or favoritism influence the outcome. In automobile quality control, however, there are specific standards a car must meet, and failure on a given standard amounts to an overall failure of quality. In other words, there are bright-line standards of what is acceptable and what is not.

With accreditors, we don't have such bright lines even when it comes to student outcomes such as graduation rates or student learning measures. So, for example, accrediting standards on student learning say things such as "The organization provides evidence of student learning... that demonstrates it is fulfilling its educational mission" not "the organization ensures that at least 60 percent of its students achieve proficiency on a widely recognized instrument that measures learning."

It's worth elaborating further on the connection between accrediting agencies and the federal government because it provides insight into how that connection might need to change. When the federal government began using public money to help low-income students gain access to college, it made the decision to allow students to choose where they would use this money. Since students would be deciding how federal dollars were spent, the government needed a mechanism for ensuring that these taxpayer dollars were being handled properly and that the institutions to which students brought the money were of sufficient quality.<sup>7</sup>

Rather than engaging in its own quality review—an arduous, expensive process that would put the government in a position of commenting on curricula—the federal government turned to accrediting agencies. Accredited status became a precondition to participating in the financial aid programs contained in Title IV of the Higher Education Act, including the Pell Grant program and the federal student loan program.<sup>8</sup>

Congress was able to co-opt this quality assurance system essentially for free since the accreditation process existed before the federal role in higher education. Colleges pay accreditors an initial fee to become accredited as well as an annual membership fee based on institutional size and often pay intermittent fees for services such as special site visits.<sup>9</sup> The federal government's role in this financing scheme, arguably, is to ensure a continual stream of customers for the accrediting agencies.

This might sound like a win-win arrangement. But there are a few flaws. First, since the government does not contract directly with the accreditors it does not have a clear mechanism for controlling what accreditors do. Instead, Congress instituted a process in which accreditors must be approved by the Department of Education in order to serve as gatekeepers to student aid.

And to make matters more complicated, it incorporated a committee that advises the department on recognition of accrediting agencies: the National Advisory Committee on Institutional Quality and Integrity. Most members of the NACIQI committee are senior administrators at colleges or state higher education systems. So the mechanism of control over quality is asking a group of higher education leaders to monitor how other groups of higher education leaders monitor the behavior of their peers' institutions.

Another problem with using accreditors to ensure the integrity of the federal financial aid program is that the incentives that guide accreditors' actions do not align with having black-and-white, high standards for quality. There are 17 accrediting agencies recognized by the Department of Education to accredit institutions.<sup>10</sup> Since colleges have their choice among agencies—as well as the choice to form a new agency—there is little incentive to be the accreditor with the most stringent standards. And accrediting agencies have their own ideas about what they should be doing since they predate their adoption as federal quality insurers.

As the federal investment in financial aid for higher education grew, however, so did the federal government's concern that the accreditation process did not guarantee quality. It began to place more requirements on accreditors to ensure that they fulfilled the quality assurance role that Congress imposed on them.

For instance, the Department of Education requires recognized accrediting agencies to have a certain number of public representatives on their boards and to submit copies of their annual reports to the department. Congress and the Department of Education also began pursuing measures to promote quality in higher education outside of accreditation, including grant programs to boost college performance and innovation, as well as more direct regulation like the new gainful employment measure that promotes better results at career education programs.

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### Is accreditation broken?

It is very common these days to point to accreditation as the source of—and solution to—the failings of the higher education system.<sup>11</sup> Kevin Carey, policy director at Education Sector, points out that the Senate's recent investigation into fraud and abuse at for-profit colleges amounts to an implicit critique of the accreditation system. And many problems that arise in higher education can be seen as a failure of quality assurance.

The low graduation rates at many community colleges and for-profit colleges, as well as some four-year institutions, are a signal that the quality of the services offered at those institutions may not be up to par. Likewise, the rising student loan default rate at many for-profit institutions may be a sign that students are not getting a sufficient education to pay their debt upon graduation. And Richard Arum and Josipa Roksa's book *Academically Adrift* that analyzes the results of the Collegiate Learning Assessment suggests that students are not learning very much at many of our nation's four-year colleges.<sup>12</sup>

Aside from these indicators, there are other reasons to question the integrity of the accrediting process. In recent years, it became common for for-profit companies to circumvent the long process of acquiring accreditation and qualifying for federal financial aid by buying colleges that already have accreditation. Accreditors allowed this process to go on relatively unchecked, with companies buying colleges and increasing their enrollment from 2,000 to 30,000 in a matter of years.<sup>13</sup> And some accrediting agencies have been allowing colleges to award credit that is inconsistent with the amount of time students spent on learning, resulting in a federal crackdown on how colleges can define college credit.<sup>14</sup>

It's difficult for outsiders to pinpoint where the flaws lie in the accreditation process because it occurs largely in secrecy. Agencies believe that the confidentiality of accreditation is essential because it encourages colleges to share information about their quality that they would not otherwise divulge. As a result, colleges may make their self-study and

peer review reports available to the public, but they need not do so. Most publish their self-study reports but do not divulge the peer review site visit reports completed by the accrediting bodies, likely because the peer reports are more critical of the institutions.

The standards accreditors apply when reviewing institutions are available even though their reports are not public. And these standards reveal two key flaws that policymakers and academics increasingly point out. First, the standards of accreditation are almost entirely based on inputs, not outcomes. That is, accreditation emphasizes the resources a college maintains for educating its students with a lesser focus on whether students actually learn anything.

One other flaw in accreditation is very clear: Accreditors do not employ minimum quality standards. There are no cutoffs in terms of university performance below which an institution may not access federal financial assistance. Many have argued that to meet the quality assurance that the federal government requires, accreditors must determine minimum performance standards that a college or university must meet. These performance measures should be standard across all institutions in a given sector.

The final problem with accreditation—at least from the federal perspective—is its dual mission of quality assurance and continuous quality improvement. To secure the investment in federal financial aid, the government needs accreditors to make absolute decisions about quality and cut off accredited status when an institution falls below minimum levels. But because accreditors favor the quality improvement function, they tend to allow institutions to maintain their accredited status while trying to improve.

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### Can it be fixed?

If the last NACIQI meeting is any indication, the general sentiment in the higher education community these days is not whether accreditation can be fixed, but how.<sup>15</sup> Rather than arguing for a total overhaul of federal quality assurance, the speakers suggested that changes could be made to the accreditation system to help it better serve federal purposes.<sup>16</sup> The major proposals on the table mirror the flaws identified in the previous section.

First, many argue that accreditors must impose outcome-based standards with cutoffs that result in rescinding accredited status.

Next, they assert that transparency is key to improving accreditation. If accreditors make their judgments available to the public, then both policymakers and students will gain a better understanding of college quality.

Finally, some higher education leaders argue that accreditors need to separate out the quality assurance function from the continuous quality improvement function. It is not really clear how this would work. But the sentiment behind it seems to be that creating a clear division between the two functions would help ensure that accreditors actually perform the quality assurance that the federal government requires of them.

Each of these suggestions has the potential to improve the accreditation system. But they require elaboration. In particular, any suggestions to fix accreditation should take into account what the federal government wants out of accreditation and what it takes to evaluate the quality of a service.

The following sections consider these recommendations and build upon them based on the government's need for a balance between quality assurance and quality improvement, and proven methods of service quality evaluation that can enhance the accreditation process.

### Protecting the federal investment requires both quality assurance and quality improvement

It is increasingly important to ensure that federal dollars for higher education are well spent with more than \$30 billion invested in the Pell Grant program and over \$100 billion in new federal student lending in 2010.<sup>17</sup> Protecting the federal investment includes directing the money toward colleges and universities that provide at least a minimum level of quality. And the argument that accreditors need to emphasize their role as assurers of minimum quality is taking hold.

One might assume that there is no need to worry about how the accreditors fare at quality improvement, as accreditors seem so confident in their established role in this space. But the federal investment is best protected if accreditors are good at both quality assurance and quality improvement.

The thing is, setting minimum cutoffs for student outcomes will help with quality assurance, but it will not bring about greater productivity or better value in higher education. In fact, if accreditors rescind accreditation abruptly—even with some phase-out program—based upon failure to meet outcomes standards, those colleges will lose access to federal financial aid—a virtual death sentence for many institutions that rely on aid programs to make college affordable for their students. And since the federal government is trying to get more people through college, not fewer, closing colleges is the very opposite of productivity.

Instead, the government needs accreditors to maintain minimum standards but also ensure that colleges do not fall below them. In other words, they should balance quality assurance with continuous quality improvement.

Accreditors state that quality improvement is a fundamental part of their business model today. But the state of American higher education indicates otherwise. If accreditors were continuously improving the quality of colleges and universities then those institutions that have existed for more than a few years would be of very good quality—and many of them are not.<sup>18</sup>

So while the accreditation process should continue to emphasize quality improvement, that function needs to be better defined and measured.

The NACIQI committee should require that accreditors set standards and goals for continuous quality improvement that emphasize increased productivity and value. They should require that accreditors set benchmarks for productivity and value such as retention rates, graduation rates, and cost per degree and develop a plan for helping colleges meet them. The mechanism for quality improvement should be more than ad hoc judgments by an accrediting committee. Rather, accreditors should identify promising practices at colleges who measure up to its benchmarks and advise other institutions as to how these practices might be adapted.

Better information for the public can also be seen as a measure of continuous quality improvement. By providing public information about how colleges measure up on student learning outcomes, cost, student satisfaction, and employment outcomes, accreditors can contribute to a higher education market where colleges compete on real attributes of the services they offer rather than on reputation alone.

To that end, NACIQI should suggest that Congress require accreditors to make such measures available to the public on the Department of Education's website.

### Service quality is more than output measures

The suggestion that accreditors begin focusing more on output measures is a good step in moving away from viewing higher education as a good to be produced and toward thinking of it as a service.

In manufacturing goods, the resources and processes that go into production can be a good indication of the quality of the final product. But in service industries, the service providers' inputs cannot be the primary measure of quality. Services are co-constructed by the provider and the customer. That is, the customer's input into the process also determines the overall quality of the output. The customer's (student's) inputs include his or her capabilities and motivations as well as his or her expectations for what the final result of the service will be.

Measuring the quality of services has always been a tricky business. But there are some general principles. Since both the customer and the service provider co-create the service, both of their expectations and perceptions of the experience are relevant when measuring service quality. Self-study by the institutions helps accreditors understand the college's expectations and its evaluation of how it measures up. But there is no similar expression of how students perceive the quality of a college. Accreditors can make more circumspect judgments about the quality of the services the college provides by incorporating both the students' and the colleges' perceptions into the accreditation evaluation.

Incorporating concepts from the measurement of service quality into the accreditation process recognizes the fact that the production and consumption of a service are inseparable. One cannot evaluate the services colleges provide without considering the contact between the college and the student.

Harvard, for example, is only a high-quality educational institution because the services it offers work well for the majority of the students it admits. If the student body of the local community college suddenly supplanted the student body at Harvard we might have very different judgments about its quality because the services it offers would not work well for its new student body.

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## Conclusion and recommendations

This paper identifies some fundamental flaws in using the accrediting process as a gatekeeper to federal financial aid, including the lack of transparency, the focus on inputs but not outcomes, and the emphasis on continuous quality improvement rather than quality assurance.

The simple fixes for these problems are to increase transparency, focus on outcomes, and emphasize quality assurance. But simply doing so would not meet the federal government's fundamental need to assure that it is investing its financial aid dollars in quality educational programs while also producing an increasing number of postsecondary completers at relatively low cost.

Instead, the paper argues that accreditation should be fixed by finding a balance between quality improvement and quality assurance and by incorporating concepts of service quality into the assessment of college quality.

Congress tasked the Department of Education's NACIQI committee with making recommendations on how to improve the higher education accreditation process. We suggest that NACIQI recommend the following based on our analysis in this brief:

- Congress should require that accreditors clarify the standards they employ for continuous quality improvement. It should also require that these standards include measures to increase colleges' productivity and decrease the price of education to maximize its value.
- Congress should also require that accreditors identify benchmarks for quality improvement and measure their progress at helping colleges improve based upon these benchmarks.
- Congress should require that accreditors create more stringent standards for quality assurance by setting standards for student learning outcomes with clear cutoffs below which colleges lose their accredited status.
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