

Mr. Herman Bounds
Director, Accreditation Group
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave. SW, Room 6C116
Washington, DC 20202

Re: Request for Comments on Review of Accrediting Agencies, **MSCHE Commission on Higher Education (MSCHE)**

March 12, 2017

Dear Members of the Accreditation Group and National Advisory Committee on Institutional Quality and Integrity,

Thank you for the opportunity to submit public comments for the upcoming June, 2017 NACIQI meeting regarding the renewal of the Middle States Commission on Higher Education (MSCHE). This comment is submitted on behalf of the Center for American Progress' postsecondary education team. We would like to submit a concern around the measurement of student outcomes for the public record.

Introduction

Accreditation is an important quality control for the nation's students and taxpayers. That is no exception for Middle States, the third largest accrediting agency, serving almost 2.3 million students and receiving \$20 billion each year in federal student aid dollars.ⁱ

While we commend Middle States for its new standards that have a greater focus on student outcomes, we do not think these standards go far enough meeting the requirements under 34 CFR 602.19.ⁱⁱ Unlike other regional agencies, Middle States does not consistently identify, collect, or analyze key data indicators on measures of student achievement.

As NACIQI and the Department of Education consider Middle States application for renewal, we hope that its review examines the agency's standards on student outcomes to ensure that the agency follows its responsibility under federal regulation.

Analysis of Key Data on Student Achievement Lacking

Under the criteria for federal recognition of an accrediting agency, 34 CFR 602.19(b) requires that an accrediting agency:

“demonstrate it has, and effectively applies, a set of monitoring and evaluation approaches that enables the agency to identify problems with an institution's or program's continued compliance with agency standards and that takes into account institutional or program strengths and stability. These approaches must include periodic reports, **and collection and analysis of key data and indicators, identified by the agency, including, but not limited to, fiscal information and measures of student achievement**, consistent with the provisions of §602.16(f).” (Emphasis added)ⁱⁱⁱ

MSCHE recently revised its standards to include a stronger focus on student outcomes. However, these new revisions leave it up to institutions to decide what they should submit to show success.

Under the new standards, use of assessment for improvement can include anything from assisting students in improving learning; improving curriculum, planning and budgeting for the provision of academic programs and services; reviewing and revising academic programs and support services; or improving key indicators of student success, such as retention, graduation, transfer and placement rates, among others.^{iv}

While this gives institutions the freedom to define their own success, it means that there does not appear to be consistency for how MSCHE evaluates colleges. It also means that institutions can potentially choose to show one flattering measure of success and conveniently ignore areas where they are not performing well. Second, the new standards require the full disclosure of information on assessments, graduation, retention, certification and licensure or licensing board pass rates.^v However, the emphasis here is on disclosure of information, not on using key data indicators to evaluate the college and improve student outcomes. Lastly, these new standards will be implemented in the 2017-18 school year, so MSCHE has not yet conducted evaluations using these new requirements, which makes it difficult to analyze how successful the agency will be in its implementation of these standards.

MSCHE standards do not measure up to the leading regional accrediting agencies in the area of student achievement. Most agencies collect and analyze, or require institutions to collect and analyze, specific measures identified by the agency on student achievement for each of their institutions. For example, the Higher Learning Commission (HLC) requires all institutions to measure retention, persistence, and completion rates.^{vi} WASC Senior College and University Commission (WASC), requires all institutions to report graduation and retention rates annually and conducts its own analysis.^{vii}

Examples of key data indicators required by regional accreditors are included below:

Accrediting Agency	Specific Measures of Student Achievement
Higher Learning Commission (HLC) ^{viii}	4.C. The institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates

	<ul style="list-style-type: none"> · The institution has defined goals for student retention, persistence, and completion that are ambitious but attainable · The institution collects and analyzes information on student retention, persistence, and completion · The institution uses information on student retention, persistence, and completion of programs to make improvements
<p>The New England Association of Schools and Colleges (NEASC)^{ix}</p>	<ul style="list-style-type: none"> · The institution’s goals for retention and graduation reflect institutional purposes, and the results are used to inform recruitment and the review of programs and services. · The institution defines measures of student success. These measures include rates of progression, retention, transfer, and graduation; default and loan repayment rates; licensure passage rates; and employment.
<p>WASC Senior College and University Commission^x</p>	<ul style="list-style-type: none"> · The institution demonstrates that students make timely progress toward the completion of their degrees and that an acceptable proportion of students complete · WSCUC’s Graduation Rate Dashboard (GRD) uses six data points to estimate the institution’s absolute graduation rate over time and accounts for all graduates · Collects retention and graduation rate data annually
<p>Accrediting Commission for Community and Junior Colleges^{xi}</p>	<ul style="list-style-type: none"> · All instructional programs culminate in student attainment of identified student learning outcomes, and achievement of degrees, certificates, employment, or transfer to other higher education programs. · The institution uses assessment data and organizes its institutional processes to support student learning and student achievement. · The institution disaggregates and analyzes learning outcomes and achievement for subpopulations of students.

The lack of a focus on key data indicators is concerning for two reasons. First, it means that MSCHE does not appear to have a consistent way to measure outcomes across institutions. For example, if one college submits information for student learning, while another institution submits data on graduation and retention, it makes it difficult to compare where colleges stand on performance relative to one another. Second, it is difficult to help institutions improve without an established baseline of performance on key indicators for comparative purposes.

Conclusion

As NACIQI and the Department review MSCHE's application for renewal, we hope this information is taken into consideration. At a minimum, MSCHE should answer how it defines success. It cannot ensure that students are well served or help institutions improve if it does not measure institutions in a way that is rigorous, consistent, and fair.

Antoinette Flores
Senior Policy Analyst
Center for American Progress

ⁱ U.S. Department of Education, "Program Outcomes by Accreditor," available at www.ed.gov/accreditation

ⁱⁱ 34 CFR 602.19(b) (2011), available at <https://www.gpo.gov/fdsys/pkg/CFR-2011-title34-vol3/xml/CFR-2011-title34-vol3-sec602-16.xml>

ⁱⁱⁱ Ibid.

^{iv} Middle States Commission on Higher Education, "Standards for Accreditation and Requirements of Affiliation, Thirteenth Edition" available at <http://www.msche.org/documents/RevisedStandardsFINAL.pdf>

^v Ibid.

^{vi} The Higher Learning Commission, "The Criteria for Accreditation and Core Components," available at <https://www.hlcommission.org/Criteria-Eligibility-and-Candidacy/criteria-and-core-components.html>

^{vii} WASC Senior College and University Commission, "About the Graduation Rate Dashboard," available at <https://www.wscuc.org/search/site/Graduation%20rate%20dashboard>

^{viii} The Higher Learning Commission, "The Criteria for Accreditation and Core Components."

^{ix} New England Association of Schools and Colleges, "Standards," available at https://cihe.neasc.org/standards-policies/standards-accreditation/standards-effective-july-1-2016#standard_five

^x WASC Senior College and University Commission, "Handbook of Accreditation 2013 Revised," available at <https://www.wscuc.org/content/2013-handbook-accreditation>

^{xi} Accrediting Commission for Community and Junior Colleges, "Accreditation Standards," available at http://www.accjc.org/wp-content/uploads/2014/07/Accreditation_Standards_Adopted_June_2014.pdf