



Watching the Watchdogs

A Look at What Happens When Accreditors Sanction Colleges

By Antoinette Flores

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Center for American Progress



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Introduction and summary

Mountain State University and Infotech Career College both faced serious sanctions in June 2011. Infotech, a small for-profit institution based in Southern California, was placed on probation by its accreditor, an agency that evaluates institutions' quality and therefore their eligibility to receive federal financial aid.¹ Mountain State University, a private nonprofit institution in West Virginia, faced a similar challenge.² It had to prove to its accrediting agency that it still deserved access to federal financial aid programs. Access to federal aid is critical to a school's survival both as a source of revenue and for students' ability to pay the cost of attendance.

While both colleges potentially faced the same ramifications from the sanctions—losing access to federal aid—their punishments were substantially different. Infotech was placed on “probation,” while Mountain State was issued “show cause.” What happened after the sanctions also varied significantly. Infotech's probation ended after three months, leaving it in the clear.³ Mountain State lost access to the federal financial aid programs a year later and closed shortly thereafter.⁴

Part of the disparate treatment might be due to problems specific to each school. The general inconsistencies, however, speak to a larger problem in the accreditation process. This process tasks private, nonprofit agencies with reviewing institutions of higher education and determining if they are qualified to participate in federal financial aid programs.

Mountain State and Infotech had different accreditation agencies. As a result, the schools faced different names for severe sanctions, as well as different punishments, even though both were punished for serious noncompliance with performance standards. The schools also faced scrutiny for different lengths of time.⁵ This does not mean that one school got an inherently unfair review. It simply means that the way they were judged and sanctioned varied significantly, raising concerns about the accreditation system's consistency, transparency, and effectiveness.

As a new analysis from the Center for American Progress shows, these concerns are an issue across the entire postsecondary accreditation system. To investigate accreditor consistency and transparency, CAP conducted a detailed review from 2010 through 2015 of key actions taken by 10 of the 12 major institutional accrediting agencies. The analysis included accreditors that only approve schools in a limited geographic region, as well as those who operate across the country.

In particular, we analyzed sanctions imposed by accreditors when they found problems at a school: We tracked the number of times each accreditor placed an institution in a serious sanction status, how long each school remained in that status, and what happened to the institution over time.

Our findings show a highly uneven system of sanctions. The actions taken by these 10 accreditors during our review, how frequently they applied negative statuses, and how long a college stayed in a given status varied significantly by accreditor. Of the 10 in our study, the national accreditors were more likely to place schools on negative sanction and withdraw accreditation than the regional accreditors. But regional accreditors were more likely to keep schools on a negative status for a much longer period of time.

This unevenness is exacerbated by basic inconsistencies, including the nomenclature for sanctions. Each accreditor has its own list of sanctions, and the terms and definitions vary. For example, when accreditors have a serious concern about a school's noncompliance with agency standards, some place a school on show cause while others put them on probation, and some do both.

Even how accreditors view the use of sanctions varies. Some treat a negative action as a short-term opportunity for the institution to prove it is in compliance and should remain accredited. Others see it as the beginning of a longer-term process meant to improve performance.

These systemic inconsistencies allow accreditors to treat schools differently, leaving students either protected or exposed. But variations in each accreditor's approach make it difficult to tell the difference. Such unpredictability also weakens the effectiveness of oversight, as well as public confidence in the system. Finally, these inconsistencies prevent clear guidance for colleges about expectations and what each must do to improve.

CAP recently submitted a public comment to the department on our findings and recommendations.⁶ To improve the effectiveness of the accreditation process, we recommend that the U.S. Department of Education and accrediting agencies work together to introduce greater consistency and transparency into the system. Accreditors must use standard language and apply consistent enforcement practices. The department and accreditors must find a way to increase transparency to ensure public confidence that actions against poor-performing institutions are taken when warranted. Together, these changes would increase overall confidence and trust in the accreditation system and its ability to ensure a high-quality education for students.

Background

Accrediting agencies are voluntary, independent membership associations that serve as the gatekeepers to federal student aid dollars. Today, 37 different accrediting agencies are recognized by the Department of Education, a status that allows them to approve colleges to participate in the federal financial aid programs.⁷

The vast majority of colleges get access to the federal financial aid programs through one of two types of institutional accreditors. The largest group are regional accreditors. These seven agencies oversee schools based on their geographic location. For example, colleges located in the South are accredited by the Southern Association of Colleges and Schools, or SACS. Regional accreditors approve the majority of public and private nonprofit colleges in their area, though they also accredit some private for-profit institutions. National accreditors, the second-largest group, are not geographically limited and instead tend to accredit schools that have a career focus, such as ITT Technical Institute. Most of the schools with national accreditation are private for-profit institutions. The remaining accreditors are programmatic and approve individual programs instead of entire schools. Programmatic accreditation, in most cases, does not serve as a gatekeeper to federal financial aid, so accreditation from an institutional accreditor is necessary.

Regardless of whether an agency is a regional or national accreditor, it is legally required to review the same elements of a college. These include facilities, faculty, finances, teaching practices, and student outcomes.⁸ Accreditors review these elements by conducting on-campus visits and requiring regular reports from institutions to assess quality and performance.

Although accreditors are all required to consider the same things, the manner in which each agency conducts oversight varies in standards, policies, and procedures.⁹ This is particularly evident in how accreditors assess student achievement. For example, the Council on Occupational Education, or COE, requires its colleges to maintain a 60 percent completion rate.¹⁰ The Accrediting Commission of Career Schools and Colleges, or ACCSC, meanwhile, requires a graduation rate that ranges from 36 percent to 84 percent based upon the lengths of an institution's programs.¹¹

Each accreditor reviews schools with a different frequency. For example, the Northwest Commission on Colleges and Universities, or NWCCU, has a seven-year accreditation cycle, while the Accrediting Council for Continuing Education & Training, or ACCET, has a fluctuating accreditation cycle of five years or fewer depending on the institution.¹²

This inconsistency also appears in sanctions used when an accreditor finds that an institution is not performing up to the agency's standards. In instances of serious noncompliance, COE uses the action "show cause" as its final step before an institution loses accreditation, while ACCSC uses probation.

Some agencies have attempted to bring more standardization to accreditor action terms and definitions. In 2014, the Council of Regional Accrediting Commissions, or C-RAC, which consists of the heads of the seven regional accreditors, adopted a common framework for accreditor actions.¹³ These created standard terms and meanings for "warning," "probation," "show cause," and "withdrawal of accreditation." Under the framework, a warning is given for a low level of concern, probation shows a high level of concern about a school's non-compliance, and show cause is the final step before a school loses accreditation. When placed on show cause, an institution must prove why its accreditation should not be withdrawn. Withdrawal is the final action and results in a school losing access to federal grants and loans. Some national agencies have since also signed onto the C-RAC framework.¹⁴

Even though all regional accreditors agreed to the framework, published policies of regional accreditors do not all reflect the standardized terms. For example, SACS and the Western Association of Schools and Colleges, Senior College and University Commission, or WASC—both regional accreditors—do not list the show cause action on their websites.¹⁵ The C-RAC framework also does not affect national accreditors that have not voluntarily chosen to adopt the terminology.

Given such wide variation, we needed a way to compare results across accreditors more accurately. The "Methodology" text box below explains how we addressed that challenge.

Methodology

This analysis includes six of the seven regional accreditors and four of the five national accreditors that approve institutions. One regional accreditor, NWCCU, and one national accreditor, the National Accrediting Commission of Career Arts & Sciences, were not included in the final analysis because their reporting history and methods varied too much from the other accreditors. For a complete list of accreditors discussed in this report, refer to the table below.

Accreditors have numerous actions available, ranging from a low level of concern—including “warning,” “notice,” and “monitoring”—to a high level of concern, including “show cause” and “probation.” The most serious action available is removing accreditation, in effect cutting an institution’s access to federal student grants and loans. Terminology for this action includes “withdraw,” “deny,” “revoke,” or “suspend.”

Because terminology varies so much, CAP created its own system for classifying accreditor actions. In particular, we grouped accreditor sanctions into two stages: Tier I and Tier II. Actions that signaled a low level of concern, including warning, notice, and monitoring, were grouped as Tier I sanctions. We categorized any actions that signal a serious red flag as Tier II sanctions. Table 1 summarizes which actions each accreditor uses by Tier I and Tier II status.

TABLE 1
Accrediting agencies, abbreviations, and sanctions by accreditor

Accreditor	Abbreviation used in report	Accreditor type	Tier I sanction	Tier II sanction
Accrediting Council for Independent Colleges and Schools	ACICS	National	Warning	Show cause Probation
Accrediting Commission of Career Schools and Colleges	ACCSC	National	Warning	Probation
Council on Occupational Education	COE	National	Warning	Probation Show cause
Accrediting Council for Continuing Education & Training	ACCET	National	N/A	Show cause
Higher Learning Commission	HLC	Regional	Notice	Probation Show cause
Southern Association of Colleges and Schools Commission on Colleges	SACS	Regional	Warning	Probation
Middle States Commission on Higher Education	Middle States	Regional	Warning	Probation Show cause
New England Association of Schools and Colleges Commission on Institutions of Education	NEASC	Regional	N/A	Show cause Probation
Western Association of Schools and Colleges Senior College and University Commission	WASC	Regional	Warning	Probation Show cause
Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges	ACCJC	Regional	Warning	Probation Show cause

Sources: Accrediting Council for Continuing Education & Training, “Policies and Practices of the Accrediting Commission” (2015), p. 8, available at <http://s3.amazonaws.com/docs.accet.org/downloads/docs/Dec%202015%20Updated%20Final%20Docs/doc.11.2015.final.pdf>; Accrediting Council for Independent Colleges and Schools, “Accreditation Criteria (PDF),” available at <http://www.acics.org/accreditation/content.aspx?id=2028> (last accessed May 2016); Council on Occupational Education, “Handbook of Accreditation: 2015 Edition” (2015), pp. 18–19, available at <http://www8.spinenet.net/council-org/files/downloads/2015/07/2015-Handbook-FINAL-3-5-2015-w-Covers.pdf>; WASC Senior College and University Commission, “Handbook of Accreditation 2013 Revised” (2015), p. 38, available at <https://www.wascenior.org/content/2013-handbook-accreditation>; Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges, “Accreditation Reference Handbook” (2015), available at http://www.accjc.org/wp-content/uploads/2015/07/Accreditation_Reference_Handbook_July_2015.pdf; Southern Association of Colleges and Schools Commission on Colleges, “Sanctions, Denial of Reaffirmation, and Removal from Membership” (2015), available at <http://www.sacscoc.org/pdf/081705/SanctionPolicy.pdf>; Higher Learning Commission, “Chapter E: Sanctions, Adverse Actions, and Appeals,” available at <http://policy.hlcommission.org/Policies/sanctions-adverse-actions-and-appeals.html> (last accessed May 2016); New England Association of Schools and Colleges Commission on Institutions of Higher Education, “Range and Meaning of Commission Actions Affecting Institutional Status” (2014), pp. 4–5, available at https://cihe.neasc.org/downloads/POLICIES/Pp58_Range_and_Meaning_of_Commission_Actions.pdf; Middle States Commission on Higher Education, “Accreditation Actions” (2016), pp. 4–5, available at <http://www.msche.org/documents/P2.3-AccreditationActions.pdf>; Accrediting Commission of Career Schools and Colleges, “Standards of Accreditation” (2015), pp. 58–61, available at <http://www.accsc.org/UploadedDocuments/July%202015/ACCSC%20Standards%20of%20Accreditation%20and%20Bylaws%20-%20070115.pdf>.

All accreditors treat both probation and show cause as a serious sanction, and an institution under sanction is at risk of losing accreditation. Based on the similar weightiness of the actions, CAP decided to treat probation and show cause interchangeably as a Tier II sanction signifying a serious level of concern.

Even though show cause and probation are treated the same in this analysis, it's important to keep in mind that the terminology and definitions are not always clear cut in meaning, strength, or use. Of those that use both, show cause precedes probation for some and follows probation for others. For example, the Accrediting Council for Independent Colleges and Schools, or ACICS, uses probation after placing an institution on show cause.¹⁶ The New England Association of Schools and Colleges, or NEASC, on the other hand, uses show cause before probation. On strength and seriousness of the action, ACICS uses show cause to give the institution an opportunity to justify why further action should not be taken.¹⁷ The way COE defines show cause is much stricter and gives the institution 30 days to show why it should not lose accreditation. That 30-day period is much shorter than the one used by the Higher Learning Commission, or HLC, which provides institutions up to one year to show why accreditation should not be removed.¹⁸ For a complete layout of actions, definitions, and use by accreditor, refer to the Appendix.

After creating our classification system, we compiled all Tier II sanctions from 2010 through 2015 based upon public notices on agency

websites.¹⁹ Because some accreditors only include the most recent history of actions, we also used archived internet pages to find missing files.²⁰ In addition, CAP contacted each accreditor that did not have a full history available to request a full record of action over the five years.²¹ Despite these requests, we were unable to obtain a complete history for ACCSC, so the data used here only measure from 2012 through 2015.²²

This database formed the basis for the rest of our analysis. We tallied actions to compare how many institutions were placed on a Tier II sanction, when an institution left a Tier II status, and how many of those on sanction eventually lost accreditation.

A few other caveats merit mentioning. The analysis that counts the overall number of institutions on sanction includes some institutions that were placed in a status before 2010 and remained under sanction during our review period. The analysis that looks at number of institutions withdrawn and how long an institution remains on sanction includes only those with known outcomes and time histories. This excludes institutions that were placed in a status prior to 2010, institutions that were placed in a status with less than a year of time to judge the outcome, and institutions that were placed in a status with no indication of when they were removed. ACCSC did not report when schools were removed from a Tier II sanction, so it is not included in the analysis that looks at length of time on sanction.

Findings

Overall, our review found large variation and unevenness in actions between regional and national accreditors. National accrediting agencies we studied, for example, were more likely to take action than regional agencies. When regionals did act, however, they kept schools on sanction for longer periods of time. While this variation might be partially influenced by the type of schools each accreditor oversees, the larger trends raise questions about how such variability undermines the strength of the college oversight system.

National accreditors are more likely than regionals to issue sanctions

Based on a compilation of Tier II accreditor actions, national accreditors are much more likely to sanction institutions that they oversee. Table 2 shows the number of institutions each school accredits, how many schools were put on a serious sanction over the five-year review period, and the percentage of accredited institutions that were sanctioned. As shown, the sanction rate for national accreditors is significantly higher than the sanction rate for regional accreditors. As a whole, national accreditors sanctioned 287 institutions, or 14 percent of the schools they accredit. Regionals, on the other hand, sanctioned 125 institutions, or 4 percent of schools. The lower sanction rate is noteworthy because regionals are the largest accrediting group and oversee the most schools.

Sanction rates also vary within the regional and national accreditors and do not appear to be connected to the overall size of the accreditor. For example, the Accrediting Council for Independent Colleges and Schools, the largest national accreditor, sanctioned 16 percent of schools, while the Accrediting Council for Continuing Education & Training, the smallest, sanctioned 50 percent of the schools it oversees. Similarly, among regionals, the Higher Learning Commission, the largest accreditor, sanctioned only 2 percent of schools, while the Accrediting Commission for Community and Junior Colleges, the smallest accreditor, sanctioned 18 percent of schools.

TABLE 2

Percentage of accredited institutions placed on a Tier II sanction by accreditor and accreditor type, 2010–2015

Accreditor	Number of institutions accredited	Institutions placed on Tier II status	Percentage sanctioned
National			
ACICS	725	114	16%
ACCSC	674	38	6%
COE	538	77	14%
ACCET	115	58	50%
Total	2,052	287	14%
Regional			
HLC	1,245	21	2%
SACS	874	35	4%
Middle States	672	30	4%
NEASC	242	5	2%
WASC	205	7	3%
ACCJC	153	27	18%
Total	3,391	125	4%

Source: CAP analysis of actions by accrediting agency. See Methodology text box for more information.

The higher sanction rate among nationals may be due to the differences in the schools they accredit. As a whole, many of the schools approved by national accreditors are for-profit institutions that are smaller, less prestigious, and not as financially strong as their public peers. In contrast, regional accreditors oversee large public colleges and elite nonprofits that are well-established and also face accountability from states or large boards. The higher sanction rate at nationals vs. regionals thus may reflect the fact that these agencies oversee colleges that are already more likely to run into trouble.

Regionals more likely to issue Tier I sanctions

Lower-level sanctions are an important tool for accreditors. They provide a way to raise concerns without threatening a college's accreditation status. But our review found that some accreditors were far more likely to use these Tier I sanctions than others. Across the 10 accreditation agencies investigated, half issued a large number of Tier I sanctions, while the other five issued very few. Among the agencies

that issued a high number of Tier I sanctions, four were regional accreditors and all issued Tier I sanctions at a much higher rate than Tier II sanctions. From 2010 through 2015, for example, the Southern Association of Colleges and Schools only issued 35 Tier II sanctions vs. 82 Tier I sanctions. Similarly, the Middle States Commission on Higher Education, or Middle States, only issued 30 Tier II sanctions vs. 73 Tier I sanctions. In total, the four regional agencies issued twice as many Tier I sanctions as Tier II sanctions.

TABLE 3
Number of Tier I and Tier II sanctions issued from 2010 to 2015, by accreditor

	Tier I sanctions	Tier II sanctions	Number of sanctions that escalated from Tier I to Tier II
Nationals			
ACICS	3	114	0
ACCSC*	30	38	4
COE	2	77	0
ACCET	N/A**	58	N/A
Regionals			
HLC	27	21	0
SACS	82	35	14
Middle States	73	30	2
NEASC	N/A**	5	N/A
WASC	7	7	0
ACCJC	53	27	2

* ACCSC data were only available from 2012 to 2015, so the number of sanctions is likely higher.

** These institutions do not use a Tier I sanction.

Source: CAP analysis of actions by accrediting agency. See Methodology text box for more information.

On the other hand, some agencies showed relatively few instances of using a Tier I sanction. While ACICS issued 114 Tier II sanctions, it only issued 3 Tier I sanctions. Similarly, the Council for Opportunity in Education issued 77 Tier II sanctions but only 2 Tier I sanctions. We unfortunately cannot tell whether these low numbers of Tier I sanctions are due to their rarity or accreditors simply not reporting them.

Interestingly, accreditors infrequently moved the institutions placed on Tier I sanctions to Tier II. Of the 73 Tier I sanctions issued by Middle States, only 2 institutions escalated to a Tier II sanction. This could mean that agencies use the lower-level sanctions to address a different set of problems than those captured by Tier II. It could also mean that agencies have concerns about a high number of institutions that never escalate to further action.

Part of the difference in usage of Tier I vs. Tier II might be explained by the definitions behind these terms. Among the eight agencies that use Tier I sanctions, seven of them issued a Tier I sanction when an institution failed to comply with agency standards. HLC, on the other hand, issued Tier I sanctions when an institution was at risk of failing to comply with standards.

The relative severity and meaning behind Tier I sanctions also varies. For example, Middle States issues a Tier I sanction instead of a Tier II sanction when it thinks an institution can improve in a reasonable amount of time. SACS issues Tier I sanctions when an institution is in noncompliance with core requirements or significant noncompliance with comprehensive standards.

The fact that many agencies rely on Tier I sanctions suggests that there needs to be greater transparency around use. While Tier I sanctions signal a lower level of concern, their use suggests that problems at institutions are important enough to sanction. Focusing only on Tier II sanctions thus misses a number of important actions.

National agencies are more likely to withdraw accreditation for institutions on sanction

Withdrawing a school's accreditation—and thus its ability to receive federal financial aid—is the most serious action available to accreditors, since access to this aid is critical to a school's survival. For this reason, many accreditors are often hesitant to terminate a college's accreditation until they are absolutely positive it cannot improve enough to meet required standards.

Table 4 shows the number of schools that ultimately lost accreditation after being placed on a Tier II sanction. As a group, national accreditors withdrew 34 institutions, or 18 percent of the schools on sanction. In contrast, regional accreditors appear unwilling to take the last and final step of stripping institutions of their accredited status. Regionals only withdrew a total of seven schools.

Breaking down the results by accrediting agency shows significant variation within categories. Small national accreditors COE and ACCET appear most willing to cut ties with institutions.

TABLE 4
Percentage of institutions placed on a Tier II sanction that lost accreditation, by accreditor and accreditor type, 2010–2015

	Institutions on probation*	Withdrawn	Withdrawal rate
National			
ACICS	72	4	6%
ACCSC	31	4	13%
COE	55	15	27%
ACCET	30	11	37%
Total	188	34	18%
Regional			
HLC	13	2	15%
SACS	28	3	11%
Middle States	27	1	4%
NEASC	2	0	0%
WASC	4	0	0%
ACCJC	25	1	4%
Total	99	7	7%

* Only includes institutions with known outcomes

Source: CAP analysis of actions by accrediting agency. See Methodology text box for more information.

Again, we do not definitively know why nationals appear to withdraw accreditation for more colleges. This may be a function of the schools they accredit. A 2014 report by the Government Accountability Office found that both sanctioning and withdrawal were most commonly taken against schools with weak finances rather than schools with poor student outcomes.²³ Many of the schools that national accreditors oversee are small privately run businesses and depend almost entirely on enrollment and student aid for revenue. Therefore, they may be less financially stable than public colleges and private nonprofits, which have various revenue sources, including state and local funding support. However, without more detail on why each institution that we studied was sanctioned, we cannot determine if the variability observed is due to institutional type or differences in accreditor standards and rationale for sanctioning colleges.

It should be noted here that the total number of institutions on probation in Table 4 is smaller than the totals in Table 3 because Table 3 only reflects schools with known outcomes. When compiling the history of actions, some institutions were placed on a Tier II sanction, but no further record was found of the outcome. Additionally, some schools were placed on a sanction either before our 2010 recording or toward the end of 2015. These schools were removed from the count used in Table 4 because the monitoring period was outside the scope of the timeline of 2010 through 2015.

Regionals keep institutions on sanction for a longer period of time

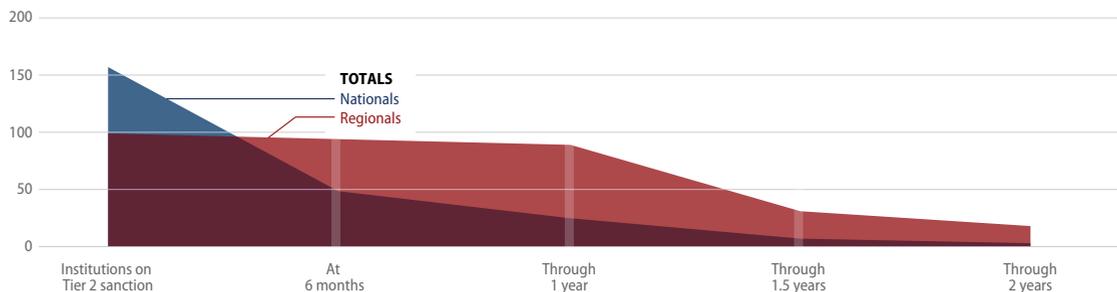
Although regionals are less likely to withdraw accreditation, they do keep sanctioned institutions under scrutiny longer than nationals. Figure 1 tracks how long accreditors keep institutions on sanctions over time. Of the 99 regionally accredited institutions on sanction, 94 percent were still on sanction or worse after six months, and 92 percent were still on sanction or worse after one year. In contrast, only 31 percent of the 157 schools sanctioned by national accreditors were still on sanction or worse at six months, and 24 percent were still on sanction or worse after one year. ACCET is an exception among nationals and keeps at least a majority of institutions on sanction for six months. On the other hand, ACICS had the shortest sanction time. Of the 72 institutions sanctioned, only seven of them were still under scrutiny or withdrawn six months later. From the outside, it would appear that the other 65 institutions are performing up to standard. As noted in the Methodology, the Accrediting Commission of Career Schools and Colleges is not recorded here because it does not provide public notice when an institution is removed from sanction.

In conversations about gatekeeping and accountability, accreditors frequently maintain that the primary role of accreditation is to improve quality.²⁴ Longer periods of sanctioning thus could suggest that accreditors use warnings, show cause, and probation as a way to monitor underperforming schools and track their progress.

The differences in sanction length also appear to reflect a fundamental difference and potential flaw in how these actions are used. National agencies appear to treat Tier II sanctions as short-term punitive actions. For example, when ACCET issues show cause, it gives an institution 30 days to prove it should remain accredited. ACICS, on the other hand, issues show cause to invite an institution to explain why further action should not be taken. In practice, further action almost never happens. Instead, the sanction is removed in fewer than six months.

FIGURE 1
Number of institutions placed on a Tier 2 sanction status
and length of time on status by accreditor, 2010–2015

Number of institutions still on Tier 2 sanction or withdrawn overtime					
Institutions on Tier 2 sanction		At 6 months	Through 1 year	Through 1.5 years	Through 2 years
National					
ACICS	72	10%	6%	0%	0%
COE	55	33%	16%	4%	2%
ACCET	30	77%	40%	17%	7%
Regional					
SACS	28	86%	82%	21%	18%
Middle States	27	96%	85%	22%	0%
ACCJC	25	100%	100%	20%	16%
HLC	13	100%	92%	62%	23%
WASC	4	100%	100%	100%	100%
NEASC	2	100%	100%	100%	100%



Source: CAP analysis of actions by accrediting agency. See Methodology text box for more information.

Fast sanction removal may be particularly concerning depending on why an institution ended up in trouble in the first place. If an institution is placed on a sanction that shows a serious level of concern about its performance or viability, it is unlikely that it will have improved drastically in fewer than six months. Yet if the accreditor removes the sanction and signals an all clear, the federal government remains blind to the institution’s problems, and students and taxpayers remain at risk.

Recommendations

Accrediting agencies serve a critical function in quality assurance. Sanctions are an important tool to communicate to institutions, the public, and students that there is a serious problem. But the current system does not do enough to serve that role. Our findings show an inconsistent system where some accreditors are more likely than others to sanction colleges and remove access to federal dollars. Some accreditors use sanctions as long-term monitoring and improvement tools, while others use sanctions on a much shorter timeline. Fixing the system and restoring faith requires a serious look at the actions accreditors can and do take and how those processes can be improved going forward.

Standardize accreditor sanction terminology

Clear terms and definitions can help the public and the federal government understand the seriousness and implications of the actions taken. As shown here, inconsistencies in terminology make it difficult to compare actions across accrediting agencies.

To address public concerns, the Department of Education released a transparency agenda in November 2015 announcing several executive actions and recommendations for Congress to increase focus on student outcomes and provide transparency.²⁵ As part of the transparency agenda, in April 2016, the department provided guidance to accrediting agencies proposing new standardization in terminology and requirements for reporting punitive actions to the department.²⁶ The letter asks that agencies group actions by three categories, similar to the way we have done in our analysis. This grouping includes actions that show an institution is at risk of noncompliance—CAP’s Tier I—actions when an institution is in serious noncompliance, probation, or its equivalent, including show cause—CAP’s Tier II—and actions that remove an institution’s accreditation.

While grouping and reporting actions by level of severity can help, agencies still use different terms with varying definitions and timelines. As the Council of Regional Accrediting Commissions framework showed, even though regional accreditors agreed to standard terms and definitions, not all agencies updated their policies accordingly. The department acknowledged in its guidance that grouping and reporting are only intermediate steps. Congress must require a single federal vocabulary for all major actions and terms, including sanctions and key outcomes, to fix the current inconsistencies.

Standardize application of accreditor sanctions

Standard sanction definitions will only go so far if the way they are applied still varies. If standardized terms are used differently in practice, it undermines the sanction's meaning and purpose. Our analysis found that different accreditors use the same type of sanction as both short- and long-term punitive actions. Accreditors that use actions over longer periods have the opportunity to monitor improvement, ensure that the institution is in compliance, and ensure that the public is adequately informed. As short-term actions, sanctions lose their strength. When a school is in serious noncompliance and the sanction is removed a short time later, it raises questions about whether the school fixed all of the issues at stake.

For starters, Tier II sanctions should be applied for similar time frames across agencies. A standard timeline needs to account for how long it should reasonably take an institution to improve. Accrediting agencies should have flexibility to go beyond the standard, but there needs to be a minimum to help ensure that schools are properly monitored and performing up to expectations. When issuing a Tier II sanction, for example, institutions probably should be monitored for at least one year before removing the sanction. Some agencies might decide that an institution needs a longer monitoring and sanctioning period and choose to extend the timeline as necessary—or decide that a college should lose accreditation faster. But no institution can be given an all clear before the one-year sanction period ends. Ideally, this would be a voluntary process where accrediting agencies come together and agree on a standard. Alternatively, Congress could implement standards through legislation.

Require reporting and reasons for all sanctions

Various approaches to public reporting create imbalance in transparency efforts. To improve the oversight system, accreditors should be required to inform the Department of Education and the public when they issue a sanction, including both Tier I and Tier II actions. In addition, they should provide an explanation of why the sanction was issued. Some agencies, such as the Higher Learning Commission and the Middle States Commission on Higher Education, already report all sanctions and provide thorough information on why sanctions are issued. Making this reporting a requirement will improve the department's understanding of sanctions. In addition, it will add balance in transparency for all students, regardless of which agency oversees the school they attend.

Require reporting when sanctions are removed

Federal regulation requires accreditors to tell the Department of Education when they place an institution on sanction or when and why they withdraw an institution's accreditation. Regulation does not require accreditors to explain when and why they removed a sanction. As a result, accreditors can place dozens of institutions on sanction and remove them mere months later with no understanding of why or under what grounds the decision was made. Accreditors should be required to inform the Department of Education and the public when sanctions are removed and provide an explanation of why. This change would give assurance that accrediting decisions are sound and provide the department with a greater ability to judge oversight.

Inform the public and consumers of sanctions

Students and the public need to be better informed of accrediting sanctions. Under federal regulation, accreditors are required to tell the Department of Education when they institute probation or its equivalent or when they withdraw an institution's accreditation. As part of its transparency agenda, the Department of Education announced that it would publicly post decisions online. But in order for the decisions to be transparent to the public and consumers, they have to first know that the website exists and what to look for. This undermines transparency goals.

Two changes should be made to fix this. First, accrediting agencies should require that institutions on sanction inform current and prospective students and provide an explanation of the problem. At least two of the accreditors in our analysis, HLC and the Accrediting Commission of Career Schools and Colleges, already require these disclosures when a school goes on probation.²⁷ Second, the Department of Education should include warning flags on its College Scorecard website to tell students when a school faces problems with its accreditation.²⁸ Today, warning flags appear for schools that are on Heightened Cash Monitoring 2 because of serious concerns about financial or regulatory compliance issues.²⁹ In both cases, the accrediting agency should provide an explanation of why the sanction was issued and the next steps in the process.

Create a searchable database of accrediting decisions

Accrediting decisions and a history of decisions are difficult to find, if they are available at all. The Department of Education is headed in the direction of shining light on sanctions and decisions. As part of its transparency agenda, the department said it would publish all final decision letters when an institution is placed on probation. More can be done.

In order to better inform the department and the public of accrediting decisions and histories, the department should publish all accrediting decisions in a searchable database that includes reasons for sanctions. The database should categorize sanctions by reason. At a minimum, this should include reasons such as weak finances or poor student outcomes. Several accreditors already are providing a history by institution. For example, in its institution database, HLC flags all institutions on sanction and provides a public disclosure that explains why the institution is on sanction, what it means for the institution, and the next steps the agency will take.³⁰ The Western Association of Schools and Colleges Senior College and University Commission takes a similar approach and includes flags for institutions on sanction and details on why. Middle States takes it a step further. In its institution database, each college has a statement of accreditation status that includes a multiyear history of accrediting decisions.³¹

Conclusion

As gatekeepers, accrediting agencies play a critical role in ensuring the quality of postsecondary institutions. Many things go into effective oversight, but consistency and transparency are an integral part of it. Consistency ensures that all institutions are being held to a high standard of performance and accountability. Transparency removes the veil of secrecy, allowing greater insight into and understanding of the accreditation process. Together, these two goals work to ensure that students are protected as consumers and that taxpayer funds are safe.

Unfortunately, CAP's review shows that the system still has a long way to go to reach needed consistency and transparency. There is too much variation in accreditation status, terminology, and use. The findings in this report also raise concerns about the meaning and adequacy of actions that accreditors can take when schools are not in compliance with standards. One school put on sanction and monitored under one agency could completely escape the radar of another agency.

Fixing the inconsistency requires changes in both standardization across accreditors and transparency of decisions. To be clear, this does not mean that the federal government should decide what the standards should be or that it should set them. Instead, it should encourage agencies to come together and set standards, either through gentle prodding or legislation. The federal government also should work with accreditors to strengthen transparency by reporting more information on accrediting decisions and making it widely available. Solving these problems will bring greater accountability and performance to the oversight system.

About the author

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Appendix

This Appendix contains a complete list of sanction terms and their definitions by accrediting agency. These details were used as the basis for categorizing sanctions by Tier I and Tier II status. Sanction language is taken directly from the accreditor sources cited below.

Middle States Commission on Higher Education³²

Warning: The Commission warns an institution that its accreditation may be in jeopardy when the institution is not in compliance with one or more accreditation standards and requirements of affiliation. A monitoring report and a small team visit are required to demonstrate that the institution has made appropriate improvements to bring itself into compliance. Warning indicates that the Commission believes that, although the institution is out of compliance, the institution has the capacity to make appropriate improvements within a reasonable period of time and the institution has the capacity to sustain itself in the long term.

Issue or continue probation: The Commission places an institution on probation when, in the Commission's judgment, the institution is not in compliance with one or more accreditation standards and requirements of affiliation and the non-compliance is sufficiently serious, extensive, or substantial that it raises concern about one or more of the following: 1. the adequacy of the education provided by the institution; 2. the institution's capacity to make appropriate improvements in a timely fashion; or 3. the institution's capacity to sustain itself in the long term. Probation is often, but need not always be, preceded by an action of warning. The Commission may place the institution on probation at any time if it determines that the institution has failed to address satisfactorily the Commission's concerns regarding non-compliance with accreditation standards and requirements of affiliation in a prior action. This action is accompanied by a request for a monitoring report and a visit. Probation may, but need not always, precede an action of show cause.

Issue show cause: Show Cause is a non-compliance action requiring an institution to demonstrate why its accreditation should not be withdrawn. The Commission may require an institution to show cause at any time if the Commission determines that the institution no longer meets one or more of the accreditation standards and requirements of affiliation. A show cause action requires an institution to present its case to the Commission for continued accreditation by means of a show cause report and an on-site visit/evaluation. The institution is required to submit a teach-out plan with the show cause report.

Withdrawal of accreditation: An institution's accredited status is withdrawn. If the institution appeals this action, its accreditation remains in effect until the appeal is completed or until the effective date of the withdrawal of accreditation. The institution must wait two years to reapply.

New England Association of Schools and Colleges Commission on Institutions of Higher Education³³

Probation status: When the Commission finds that an institution fails to meet one or more Standards for Accreditation and/or other policies, the Commission will withdraw accreditation (see below) or place the institution on probation. In such situations, the Commission will place an institution on probation if it determines that the failure to meet one or more Standards represents a condition that can be remedied by the institution within the time period allowed. Prior to placing an institution on probation, having determined that there is reason to believe that the institution may not meet one or more of the Standards for Accreditation, the Commission will provide an opportunity for the institution to show cause why the action should not be taken.

Withdrawal of accreditation: The Commission will withdraw the accreditation of an institution on probation if at the end of the specified time period, but not to exceed two years, the institution has not come into compliance with the Commission's Standards unless extended for good cause. The Commission may also withdraw the accreditation of an institution not on probation if it finds that the institution is not meeting one or more Standards for Accreditation and that this noncompliance is fundamental to the institution's integrity or its ability to come into compliance within the two-year period. For institutions not on probation, if the Commission has reason to believe that the institution may fail to meet one or more Standards for Accreditation prior to taking the action to withdraw accreditation, the Commission will provide an opportunity for the institution to show cause why the decision to withdraw accreditation should not be made.

Notice: Notice is a public sanction that attaches to an institution's accreditation status. This status indicates that an institution is at risk of being out of compliance with one or more Criteria for Accreditation, or Federal Compliance Requirements or out of conformity with the Assumed Practices but nevertheless is currently in compliance with these requirements. An action to impose Notice is a final action not subject to appeal. The Board of Trustees may impose Notice at the end of Probation or Show-Cause if the institution has demonstrated compliance with the areas previously identified as non-compliant but remains at risk related to those areas of non-compliance or other deficiencies. If, at the end of the Notice period, the Board finds that the deficiencies leading to the Notice action have not been ameliorated, the Board may place the institution on Probation or may withdraw its accreditation following Commission policy.

Probation: Probation is a public sanction that attaches to an institution's accreditation status. This status indicates that an accredited institution is no longer in compliance with one or more of the Commission's Criteria for Accreditation or Federal Compliance Requirements or is out of conformity with the Assumed Practices. The institution remains accredited while it is on Probation. An action to impose Probation is a final action not subject to appeal. The Board is not required to have placed an institution on Notice prior to the imposition of Probation nor is the Board required to provide a period of Probation prior to withdrawing accreditation.

Show cause: The Board of Trustees may require an accredited institution to show cause, within a limited period of time not to exceed one (1) year, as to why its accreditation should not be removed. The basis for the issuance of a Show-Cause Order will be the Board's determination that there is probable cause that the institution does not meet the Criteria for Accreditation or the Federal Compliance Requirements or is out of conformity with the Assumed Practices. The Show-Cause Order is public. The institution remains accredited while it is on Show-Cause. An order to show cause is a final action not subject to appeal.

Withdraw: The grounds for withdrawal of accreditation shall be that the institution does not meet one or more of the Criteria for Accreditation or Federal Compliance Requirements or fails to demonstrate conformity with the Assumed Practices or has not demonstrated a pattern of meeting the Obligations of Affiliation during the accreditation period.

Warning: The less serious of the two sanctions, Warning is usually, but not necessarily, levied in the earlier stages of institutional review and often, but not necessarily, precedes Probation. It cannot, however, succeed Probation. An institution may be placed on Warning or Probation for noncompliance with any of the Core Requirements or significant noncompliance with the Comprehensive Standards. Additionally, an institution may be placed on Warning for failure to make timely and significant progress toward correcting the deficiencies that led to the finding of noncompliance with any of the Principles of Accreditation.

Probation: Failure to correct deficiencies or failure to make satisfactory progress toward compliance with the Principles of Accreditation, whether or not the institution is already on Warning, may result in the institution being placed on Probation. An institution may be placed on Probation for the same reasons as discussed above regarding Warning if the Commission's Board of Trustees deems noncompliance with the Principles to be serious enough to merit invoking Probation whether or not the institution is or has been on Warning. Probation is a more serious sanction than Warning and is usually, but not necessarily, invoked as the last step before an institution is removed from membership.

Denied reaffirmation + warning or probation: The institution's accreditation will not be reaffirmed while it is on Warning or Probation, but its accreditation will be continued.

Withdrawal: An institution may be removed from SACSCOC membership at any time, depending on the Board of Trustees's (sic) judgment of the seriousness of noncompliance with the Principles of Accreditation or with the Commission's policies and procedures. Removal from membership, however, usually occurs after persistent or significant noncompliance during a monitoring period or any time an institution is being followed for Good Cause. A serious instance of noncompliance or repeated instances of noncompliance may result in removal of membership without a monitoring period.

Warning: An institution has been determined by the Commission not to meet one or more standards, and Reaffirmation for One Year is not warranted. When the Commission finds that an institution is out of compliance with the Commission's Standards to an extent that gives concern to the Commission, it may issue Warning to the institution to correct its deficiencies, refrain from certain activities, or initiate certain activities, and meet the standards. The Commission may also issue Warning if the institution has acknowledged within its Institutional Self Evaluation Report or Special Report the deficiencies leading to serious noncompliance, and has demonstrated affirmative steps and plans to fully resolve the deficiencies within twelve months.

Probation: An institution has been determined by the Commission not to meet one or more standards, and there is a serious concern on the part of the Commission regarding the level and/or scope of the noncompliance issues. When an institution deviates significantly from the Commission's Standards, but not to such an extent as to warrant a Show Cause mandate or the termination of accreditation, the Commission will impose Probation. The Commission may also impose Probation when the institution fails to respond to conditions placed upon it by the Commission, including a Warning.

Show cause: When the Commission finds an institution to be in substantial noncompliance with the Commission's Standards, it will mandate Show Cause. The Commission may also mandate Show Cause when the institution has not responded to the previous conditions imposed by the Commission. Under Show Cause, the institution is required to demonstrate why its accreditation should not be withdrawn at the end of a stated period by providing evidence that it has corrected the deficiencies noted by the Commission and is in compliance with the Commission's Standards.

Withdrawal: If, in the judgment of the Commission, an institution has not satisfactorily explained or corrected deficiencies of which it has been given notice, or has taken an action that has placed it significantly out of compliance with the Eligibility Requirements, Accreditation Standards, and Commission policies (together Commission's Standards), its accreditation may be withdrawn.

Western Association of Schools and Colleges Senior College and University Commission³⁷

Warning: A Warning reflects the Commission's finding that an institution fails to meet one or more of the Standards of Accreditation.

Probation: Probation reflects the Commission's finding that the institution has serious issues of noncompliance with one or more of the Standards of Accreditation.

Show cause: An Order to Show Cause is a decision by the Commission to terminate the accreditation of the institution within a maximum period of one year from the date of the Order, unless the institution can show cause as to why such action should not be taken. Such an Order may be issued when an institution is found to be in substantial noncompliance with one or more Commission Standards or, having been placed on Warning or Probation for at least one year, has not been found to have made sufficient progress to come into compliance with the Standards.

Withdraw: A decision to withdraw candidacy or accreditation is made by the Commission when an institution has been found to be seriously out of compliance with one or more Standards. Although not required, a decision to withdraw accreditation may be made after an Order to Show Cause or another sanction has been imposed and the institution has failed to come into compliance.

Accrediting Commission of Career Schools and Colleges³⁸

Warning: In cases where the Commission has reason to believe that a school is not in compliance with one or more accreditation standards or other requirements, the Commission may at its discretion, issue a Warning to the school.

Probation: In cases where the Commission has significant concerns regarding a school's compliance with one or more accrediting standards or other requirements or has made a determination that a school is out of compliance with one or more standards, the Commission may, at its discretion, place a school on Probation. As part of the Probation Order, the Commission may, at its discretion, direct the school to show cause as to why the school's accreditation should not be withdrawn.

Withdrawal: Following the due process required by these Rules, the Commission may withdraw the accreditation of a school any time a school fails to demonstrate compliance with one or more accreditation standards or other requirements and for any of the reasons, or combination thereof, described below. The Commission may, at its discretion, withdraw a school's accreditation and remove the school from the list of ACCSC-accredited schools without first issuing a Warning or Probation Order.

Accrediting Council for Continuing Education & Training³⁹

Show cause: The Commission may issue a show cause directive if it has substantive questions and concerns regarding the institution's compliance with ACCET standards, policies, and procedures. A show cause is not an adverse action but rather a statement of such serious concern that the institution must provide sufficient evidence to demonstrate that it does, in fact, comply with the ACCET standards, policies, and procedures such that its accreditation should not be withdrawn.

Deny: The Commission may deny reaccreditation if the institution fails to meet one or more of the standards. The Commission will inform the institution, in writing, of the reasons for the denial. An institution that has been denied reaccreditation has the right to appeal the Commission's action.

Withdraw: The Commission may withdraw the current grant of accreditation to an institution at any time prior to the official expiration date if the Commission finds that the institution has not demonstrated its compliance with ACCET standard(s), policies, and procedures.

Accrediting Council for Independent Colleges and Schools⁴⁰

Warning: When the Council determines that an institution is not in compliance with the Accreditation Criteria, the Council will issue a compliance warning. A show-cause directive or a denial action/suspension order may be issued by ACICS as the result of this review as described in Section 2-3-230 or 2-3-402.

Show cause: When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, with the Accreditation Criteria, the institution will be provided in writing with the areas of noncompliance and will be invited to "show cause" why its accreditation should not be suspended or otherwise conditioned.

Probation: Probation is a status that the Council may impose on an institution if the institution is unable to demonstrate that it consistently operates in accordance with the Accreditation Criteria. Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action.

Deny: Denial of an accredited status is characterized by the Council as a “withholding” action and is differentiated from suspension of accreditation, which is a “withdrawal” action. There are two levels of denial. One totally withholds accreditation of the institution or a branch; the other denies approval of a requested substantive change. Denial at either level constitutes a negative action and is challengeable by the institution.

Withdraw: “Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration.

Suspend: Suspension of accreditation may occur when, in the judgment of ACICS, an institution no longer complies with the criteria.

Council on Occupational Education⁴¹

Notification of apparent deficiency: Notification of Apparent Deficiency is a status which signifies that the institution is apparently deficient with respect to a requirement of the Commission.

Heightened monitoring: Heightened Monitoring is a status that signifies that the Commission has determined a need to more closely monitor an institution. The types and the requirements for reporting will be established by the Commission and may include but are not limited to reports on financial stability, administrative capability, and program outcomes.

Warning: Warning is a status imposed on an institution for a period of time from 30 days up to one year by the Commission if it determines that an institution is possibly in violation of one or more of the standards, criteria, and/or conditions of the Council.

Probation: This status is imposed when, in the judgment of the Commission, there is a violation of standards, criteria, and/or conditions of the Council that must be corrected or the institution will suffer loss of candidate status or accreditation.

Show cause: This status is assigned by the Commission giving an institution 30 days to show cause why the institution should not be dropped because of one or more serious violations of the standards, criteria, and/or conditions of the Council.

Endnotes

- 1 History of actions received through personal communication from Council on Occupational Education, March 8, 2016.
- 2 Dave Boucher, "Mountain State University loses accreditation," *Charleston Gazette-Mail*, July 11, 2012, available at <http://www.wvgazette.com/news/201207100067>.
- 3 Ibid.
- 4 Boucher, "Mountain State University loses accreditation."
- 5 History of actions received through personal communication from Council on Occupational Education.
- 6 Letter from Center for American Progress to Kate Mullen, "Re: Agency Information Collection Activities; Comment Request; Accrediting Agencies Reporting Activities for Institutions and Programs Docket ID ED-2016-ICCD-0035," June 6, 2016, available at <https://www.regulations.gov/#documentDetail;D=ED-2016-ICCD-0035-0016>.
- 7 U.S. Department of Education, "Accreditation in the United States: Regional and National Institutional Accrediting Agencies," available at http://www2.ed.gov/admins/finaid/accred/accreditation_pg6.html (last accessed May 2016).
- 8 U.S. Department of Education, "Accreditation in the United States," available at <http://www2.ed.gov/admins/finaid/accred/index.html?exp=2> (last accessed May 2016).
- 9 Ibid.
- 10 U.S. Department of Education, *National and Programmatic Accreditors Summary of Student Achievement Standards* (2015), available at <http://www.ed.gov/accreditation>.
- 11 Accrediting Commission of Career Schools and Colleges, "School Characteristics and Student Achievement Outcomes Report" (2014), available at <http://www.acsc.org/UploadedDocuments/July%202014%20IRDO%20Forms/august%202014/2013%20Annual%20Report%20Review.pdf>.
- 12 U.S. Department of Education, *National and Programmatic Accreditors Summary of Student Achievement Standards*.
- 13 Doug Lederman, "Getting Their Act(ion)s Together," Inside Higher Ed, April 20, 2014, available at <https://www.insidehighered.com/news/2014/04/10/regional-accreditors-align-their-actions-and-procedures-they-use-impose-them>.
- 14 Letter from Michale S. McComis to ACCSC-Accredited Institutions and Other Interested Parties, "Call for Comment," May 29, 2014, available at <http://www.acsc.org/UploadedDocuments/Call%20for%20Comment%20052914.pdf>.
- 15 WASC Senior College and University Commission, "Handbook of Accreditation 2013 Revised" (2013), available at <https://www.wascenior.org/content/2013-handbook-accreditation>; Southern Association of Colleges and Schools Commission on Colleges, "Sanctions, Denial of Reaffirmation, and Removal from Membership" (2015), available at <http://www.sacscoc.org/pdf/081705/SanctionPolicy.pdf>.
- 16 Accrediting Council for Independent Colleges and Schools, "Council Decisions," available at <http://www.acics.org/accreditation/content.aspx?id=2028> (last accessed May 2016).
- 17 New England Association of Schools and Colleges Commission on Institutions of Higher Education, "Range and Meaning of Commission Actions Affecting Institutional Status" (2014), available at https://cihe.neasc.org/downloads/POLICIES/Pp58_Range_and_Meaning_of_Commission_Actions.pdf.
- 18 Higher Learning Commission, "Chapter E: Sanctions, Adverse Actions, and Appeals," available at <http://policy.hlcommission.org/Policies/sanctions-adverse-actions-and-appeals.html> (last accessed May 2016).
- 19 Accrediting Council for Independent Colleges and Schools, "Council Actions," available at <http://www.acics.org/commission%20actions/content.aspx?id=1472> (last accessed May 2016); Accrediting Commission of Career Schools and Colleges, "Public Notice of Commission Actions," available at <http://www.acsc.org/Commission-Actions/Public-Notice.aspx> (last accessed May 2016); Council on Occupational Education, "Commission Actions," available at <http://www.council.org/commission-actions/> (last accessed May 2016); Accrediting Council for Continuing Education & Training, "Commission Reports," available at <http://accet.org/commission/commission-reports> (last accessed May 2016); Higher Learning Commission, "HLC Actions," available at <http://www.hlcommission.org/HLC-Institutions/recent-actions.html> (last accessed May 2016); Southern Association of Colleges and Schools Commission on Colleges, "Accreditation Actions & Disclosure Statements," available at <http://www.sacscoc.org/accreditationDisclosure.asp> (last accessed May 2016); Middle States Commission on Higher Education, "Recent Commission Actions," available http://www.msche.org/institutions_recentactions.asp (last accessed May 2016); New England Association of Schools and Colleges, "Recent Commission Actions," available at <https://cihe.neasc.org/about-our-institutions/recent-commission-actions> (last accessed May 2016); WASC Senior College and University Commission, "Commission Actions," available at <https://www.wascenior.org/commission-actions> (last accessed May 2016); Accrediting Commission for Community and Junior Colleges, "Actions on Institutions," available at <http://www.acccj.org/actions-on-institutions> (last accessed May 2016).
- 20 Digital archives of webpages store data that can be accessed after a webpage is updated and revised. Web archiving sites allow users to access website content at various points in time. The web archiving site Wayback Machine was used for this analysis in order to obtain older files from the websites listed in endnote 21 that are no longer available to visitors. See Wayback Machine, "Homepage," available at <https://archive.org/web/> (last accessed May 2016).
- 21 Personal communication from Accrediting Commission of Career Schools and Colleges, Council on Occupational Education, Accrediting Commission for Career and Junior Colleges, and New England Association of Schools and Colleges, March 2016.
- 22
- 23 Government Accountability Office, "Education Should Strengthen Oversight of Schools and Accreditors," GAO-15-59, Report to the Ranking Member, Committee on Education and Workforce, House of Representatives, December 2014, available at <http://www.gao.gov/>

assets/670/667690.pdf.

- 24 Antoinette Flores, "Hooked on Accreditation: A Historical Perspective" (Washington: Center for American Progress, 2015), available at <https://www.americanprogress.org/issues/higher-education/report/2015/12/14/127200/hooked-on-accreditation-a-historical-perspective/>.
- 25 U.S. Department of Education, *Fact Sheet - Department of Education Advances Transparency Agenda for Accreditation*, available at <http://www.ed.gov/accreditation> (last accessed May 2016).
- 26 Inside Higher Ed, "Education Department Drafts Standards for Accreditors," April 6, 2016, available at <https://www.insidehighered.com/quicktakes/2016/04/06/education-department-drafts-standards-accreditors>.
- 27 Higher Learning Commission, "Chapter E: Sanctions, Adverse Actions, and Appeals"; The Accrediting Commission of Career Schools and Colleges, "Standards of Accreditation" (2015), pp. 58–61, available at <http://www.accsc.org/UploadedDocuments/July%202015/ACCSC%20Standards%20of%20Accreditation%20and%20Bylaws%20-%20070115.pdf>.
- 28 U.S. Department of Education, "College Scorecard," available at <https://collegescorecard.ed.gov/> (last accessed May 2016).
- 29 Michael Itzkowitz, "Know Before You Go: Updated College Data for Students and Families," Homeroom, available at <http://blog.ed.gov/2016/03/know-before-you-go-updated-college-data-for-students-and-families/> (last accessed May 2016).
- 30 Higher Learning Commission, "Statement of Accreditation Status," available at <https://www.hlcommission.org/component/directory/?Action=ShowBasic&Itemid=&instid=1987&lang=en> (last accessed May 2016).
- 31 Middle States Commission on Higher Education, "Institution Directory," available at https://www.msche.org/institutions_directory.asp (last accessed May 2016).
- 32 Middle States Commission on Higher Education, "Accreditation Actions," pp. 4–5, available at <http://www.msche.org/documents/P2.3-AccreditationActions.pdf> (last accessed May 2016).
- 33 New England Association of Schools and Colleges Commission on Institutions of Higher Education, "Range and Meaning of Commission Actions Affecting Institutional Status," pp. 4–5.
- 34 Higher Learning Commission, "Chapter E: Sanctions, Adverse Actions, and Appeals."
- 35 Southern Association of Colleges and Schools Commission on Colleges, "Sanctions, Denial of Reaffirmation, and Removal from Membership."
- 36 Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges, "Accreditation Reference Handbook" (2015), available at http://www.accj.org/wp-content/uploads/2015/07/Accreditation_Reference_Handbook_July_2015.pdf.
- 37 WASC Senior College and University Commission, "Handbook of Accreditation 2013 Revised," p. 38.
- 38 The Accrediting Commission of Career Schools and Colleges, "Standards of Accreditation," pp. 58–61.
- 39 Accrediting Council for Continuing Education & Training, "Policies and Practices of the Accrediting Commission" (2015), p. 8, available at <http://s3.amazonaws.com/docs.accet.org/downloads/docs/Dec%202015%20Updated%20Final%20Docs/doc.11.2015.final.pdf>.
- 40 Accrediting Council for Independent Colleges and Schools, "Accreditation Criteria (PDF)," available at <http://www.acics.org/accreditation/content.aspx?id=2028> (last accessed May 2016).
- 41 Council on Occupational Education, "Handbook of Accreditation: 2015 Edition," pp. 18–19, available at <http://www8.spinen.net/council-org/files/downloads/2015/07/2015-Handbook-FINAL-3-5-2015-w-Covers.pdf> (last accessed May 2016).

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