



Informing Improvement:

*Recommendations for Enhancing Accreditor
Data-Use to Promote Student Success and
Equity*

Kim Dancy, Research Associate

Institution for Higher Education Policy

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Report: *Informing Improvement*

Recommendations for Enhancing Accreditor Data-Use

- Accreditors oversee institutional quality and continuous improvement efforts at their member institutions
- Some institutions already successfully use data to drive improvement, and accreditors could leverage their influence to spur data-driven improvement on a larger scale
- The goal of our report was to better understand how accreditors currently use data, and identify ways their data-use practices could be improved

What we did:

- Interviews with policy experts in accreditation space
- Reviews of accreditor documents including standards, annual guidance and reporting requirements, and institutional self-studies
- Interviews with leaders of accrediting agencies—direct accreditor quotes included through out the report, partially anonymized
- In person convening of agency leaders to provide feedback on initial findings

Barbara Brittingham, President, New England Commission of Higher

Barbara Gellman-Danley, President, and **Patricia O'Brien**, Senior Vice President, Higher Learning Commission

Leah Matthews, Executive Director, Distance Education Accrediting Commission

Michale McComis, Executive Director and CEO, Accrediting Commission of Career Schools and Colleges

Michael Milligan, Executive Director and CEO, ABET

Marlene Moore, Former President, and **Sonny Ramaswamy**, President and CEO, Northwest Commission on Colleges and Universities

Marsal Stoll, CEO, Accreditation Commission for Education in Nursing

Jamienne Studley, President and CEO, and **Henry Hernandez**, Former CIO, WASC Senior College and University Commission

Belle Wheelan, President, and **Alexei Matveev**, Director of Training and Research, Southern Association of Colleges and Schools Commission on Colleges

Richard Winn, President, Accrediting Commission for Community and Junior Colleges

Definitions

Accreditor:

- Institutional accreditation, which includes accreditation agencies that are either national or regional in scope, reviews educational institutions, and is required for institutions to access federal financial aid programs.
- Programmatic accreditation focuses on specific programs within institutions, such as business, engineering, law, or nursing.

Student outcomes:

- Student outcomes refer to quantitative metrics of student success, including but not limited to student retention, graduation rates, transfer rates, and post-college employment outcomes.



Findings

January 23, 2020

Findings:

1. Accreditors recognize the value of improving federal postsecondary data collections.

- Increasing the quality and comprehensiveness of federal data collections is key
 - On graduation rates for part-time and transfer students through Outcome Measures surveys: “We’re very pleased that they’re [ED] doing that [OM]. I think everyone is quite happy about that.”

Findings:

1. Accreditors recognize the value of improving federal postsecondary data collections.

- Common definitions of metrics and terms
 - “I’d just love to come up with a standard definition of graduation. What is ‘graduated’?...but everybody wants to exclude every student from the...calculation.”
 - Other measures, likes transfer rates or employment outcomes also need to be standardized.

Findings:

1. Accreditors recognize the value of improving federal postsecondary data collections.

- Ensuring accuracy and timeliness
 - Federal data are relatively consistent over time and contains more reliable information, available free of charge.
 - State data is often insufficient since you only see a partial window.
 - Closing the gaps in federally available data has big implications for accreditors: “If there were data in which we felt sufficiently confident, we might have a bright line minimum number...problem is, we don’t have them.”

Findings:

2. Accreditors collect several institution-level measures of student access and success.

- All accreditors in our study require at least some data from their member institutions
 - “There is an increasing emphasis on using data and an increasing attention to academic quality and academic success, student success.”

Findings:

2. Accreditors collect several institution-level measures of student access and success.

- The metrics collected vary considerably, with very few accreditors disaggregating data by race or income

Table 1: Overview of accreditor data collection

Summarized below is an examination of whether the accreditors reviewed in this report collect various quantitative outcome metrics, and whether those metrics are disaggregated on the basis of race, Pell Grant status, or both. We have selected the most critical metrics articulated in IHEP’s “Toward Convergence” metrics framework, and based our initial research into these metrics on the analysis in the Center on American Progress (CAP) report on accreditor data collection and use. This analysis evaluates the collection of these data based on publicly available accreditor information, primarily annual information collections, supplemented in some cases by a sample of institutional self-study documents. Prior to publication of the final version of this report, the accreditors listed were given an opportunity to review and voice comments and concerns, if any.

STUDENT OUTCOME INDICATOR	ABET	ACCJC	ACCSC	ACEN	DEAC	HLC	NECHE	NWCCU ¹	SACSCOC	WSCUC
Total enrollment	•	•	• ²	•	•	•	•	•	•	•
Number of completers	•	•	•	•	•	•	•		•	
Completion rate			•	•	•		• ³	•	• ⁴	•
Cohort default rate			•		•	•	•	•	•	•
Retention/withdrawal rate			•		•		•	•	•	
Licensure/certification passage rate		•	•	•	•		•			
Transfer-out rate		•	•				•	•	•	
Loan repayment rate							•		•	
Employment rate (for career programs)		•	•	•			•			
Median earnings			•						•	
Credit completion										
Credit accumulation										
Gateway course completion										

■ Elements disaggregated by race and Pell status

■ Elements disaggregated by race only

■ Elements disaggregated by Pell status only

Findings:

2. Accreditors collect several institution-level measures of student access and success.

- There are financial incentives to more robust data use
 - “So, institutions that want good enrollment statistics have every incentive to work on this. So, it’s not just an educational motivation or moral motivation or any of that. It’s also really a financial motivation.”

Findings:

3. There is little evidence of accreditors integrating data into the review process or basing consequences on data.

- “We’re probably using less data than you might have imagined.”
 - Some evidence that national and programmatic accreditors are farther along than regional accreditors in their data-use practices. It may be easier for national accreditors which tend to be predominantly career-focused, memberships are more homogenous

Findings:

3. There is little evidence of accreditors integrating data into the review process or basing consequences on data.

- Very little evidence of linking improvement and consequences
 - In cases where data was being used, many talked about monitoring, rather than providing technical assistance or other more proactive responses
 - ACCSC does use benchmarks for its programs, noting “don’t get the impression that if a program dips below the benchmark it’s automatically done. It’s the beginning of an analysis, and sort of beginning of the conversation around...what’s going on with this program?”

Findings:

4. Accreditors rarely disaggregate data for purposes of promoting equity.

- Despite severe disparities in access and success for low-income students and students of color, little disaggregation exists
 - Enrollment is the most commonly disaggregated data element, and at least one accreditor each also disaggregated graduation rates, number of completers and loan repayment status
 - No accreditors looked at disaggregated data on so-called “leading indicators” like course persistence or first-year retention, which is troubling since these indicators allow for action while students are still enrolled

Findings:

4. Accreditors rarely disaggregate data for purposes of promoting equity.

- One accreditor: “This [improving results for historically underserved students] is not the focus of accreditation...The agenda for accreditation agencies is improving educational quality for all and to be a reliable source for judging educational quality. That is our charge by the federal government and this must be our focus...Accreditation isn’t here to solve social issues.”
- Other accreditors were concerned about the data being misused as a way to penalize or shame schools or accreditors, or in ways that are harmful to underrepresented students. Almost all accreditors expressed concerns about capacity.

Findings:

5. Accreditors face real but surmountable barriers to improving data collection and use.

- Diversity of institutions
- First-time, full-time graduation rates
- Lagging outcome metrics
 - “Sometimes retention data for us is more important because it’s something that’s happening this year.”
- Lack of institutional and accreditor resources
 - “The wealthier institutions have greater capacity to collect and use data...so, there is kind of a rich-get-richer phenomenon here.”
- Lack of common taxonomies, definitions, and processes
- Fear of reductive, punishing data-use practices



Case Studies

January 23, 2020

Southern Association of Colleges and Schools Commission on Colleges

Measures progress against baseline completion metrics

- In 2017-18 the regional accreditor asked member institutions to choose from four different measures of completion (the IPEDS graduation rate, the SACSCOC graduation rate, IPEDS outcome measures, or the National Student Clearinghouse completion rate)
- Each school's performance on their selected metric was then used to create a baseline, and subsequent performance is now evaluated against these measures

Accrediting Commission of Career Schools and Colleges

Defines completion and employment metrics and thresholds

- ACCSC calculates cohort graduation rates and employment outcomes for each program and institution
- Based on program length, graduation rates and employment outcomes are evaluated relative to ACCSC's published graduation and employment benchmarks—set one standard deviation below the average for programs of similar length
- Programs that are near or below the benchmark will be marked for more in-depth reviews, improvement plans, and may eventually lose accreditation

Accreditation Commission for Education in Nursing

Benchmarks program performance on completion, job placement, and licensure pass rates

- ACEN requires institutions and programs to set their own benchmarks of program completion and job placement using measurable, realistic, and reasonable expected levels of achievement and to justify these expectations, as well as to compare their actual performance with their expectations
- ACEN also requires licensure exam pass rates of at least 80 percent, the institution and program must report this information to ACEN

WASC Senior College and University Commission

Created a graduation rate dashboard (GRD) and uses key indicators in review materials

- Created the GRD in 2014 to address limitations in IPEDS graduation rates—this estimates both the proportion of credits associated with a particular school and the proportion of entering students who are expected to graduate regardless of the amount of time it takes
- WSCUC also presents key indicators to institutional review teams, decision-makers and other staff, to provide context ahead of the site review for things to look for and important conversations to have



Recommendations

January 23, 2020

Recommendations:

1. Accreditors should embed data use into routine practice.

- Collect, monitor, and act on multiple measures
 - Accreditors should identify data elements that are most critical for their institutions and regularly review these indicators, relying on federal data where possible, and collecting other measures as necessary.
 - It may be appropriate for different accreditors to emphasize different metrics based on mission, or even to emphasize different metrics for different types of institutions if the accreditor oversees a heterogeneous pool.
 - Wherever possible, accreditors should rely on federal data sources, such as IPEDS, the College Scorecard, and the Federal Student Aid Data Center.

Recommendations:

1. Accreditors should embed data use into routine practice.

- Disaggregate by at least race/ethnicity and income/Pell status
 - Collect outcome metrics disaggregated by income and race to determine how institutions are serving low-income students and students of color
 - Act upon these results to promote a more equitable higher education system.
 - Accreditors will likely need to look to state systems, the institutions themselves, or other resources to acquire this information

Recommendations:

1. Accreditors should embed data use into routine practice.

- Prioritize accretor resources on the basis of outcome data using a risk-informed framework for institutional reviews. Specifically:
 - Proactively identify institutions or programs that present risks to students and taxpayers
 - Prioritize staff and resources to the institution in the need of the most support
 - Identify institutions that have improved over time, or serve disadvantaged students particularly well to facilitate the sharing of lessons across institutions

Recommendations:

2. Emphasize equity.

- Data requirements send a message about accreditor priorities and allow accreditors to better discern trends than relying on topline results
- Failing to collect disaggregated data can obscure performance issues for specific subgroups—identifying these gaps is the first step for institutions and accreditors to begin to influence change
- Disaggregation by itself is not sufficient to address systemic disparities in higher education, but it is a necessary prerequisite to understanding where and to what extent such disparities occur

Recommendations:

3. Increase transparency about data-use practices.

- Accreditors should collaborate to better understand quantitative performance measures and how they might be used
 - For example, the Council of Regional Accrediting Commissions (C-RAC) released a report in 2018 highlighting how graduation rates can be used by different accreditors to identify low performing institutions and help them improve
 - Similar studies, including national and programmatic accreditors, and looking at more data elements and data disaggregated by race/ethnicity and income are extremely valuable

Recommendations:

3. Increase transparency about data-use practices.

- Build trust and understanding by explaining what data is collected, how it is used, and how the data informs the decision-making processes
 - Disconnect between policy community and accreditor's work



Questions?

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