

NACIQI Dashboard Subcommittee Report

February, 2024

The membership of the subcommittee is Wallace E. Boston (Chair), David Eubanks, Molly Hall-Martin, and Kathleen Sullivan-Alioto.

The subcommittee continued the foci of the original pilot project on data.

1. General performance and outcomes of the institutions the agency accredits
2. Decision activities of and data gathered by the agency
3. Standards and practices with regard to student achievement
4. Agency activities in improving program/institutional quality

In October and November, 2023, the subcommittee considered these items from the perspectives of accrediting agencies by interviewing leadership from four former regional accreditors, a national accreditor, and a specialized accreditor. The conversations explored the use of data summaries in monitoring the performance of US higher education institutions and programs, with a focus on job placement outcomes, student intent, retention, and completion rates. The subcommittee asked questions about the data dashboard that exists now, other sources of student achievement data, and the application of these statistics in assessing student achievement. The interviews were also listening sessions, to understand the perspectives of accrediting agencies.

General Impressions

The accreditor dashboard is seen as useful, and some agencies depend on it for information, but its usefulness for NACIQI's advisory role is limited by several factors.

- Important data elements are not found in the report, e.g. graduation rates for graduate programs or transfer-in students,
- The dashboards for specialty accreditors are still in progress and not useful for comparing student loan debt and earnings of graduates from the programs that they accredit.
- Other data summaries may not be representative due to sampling that, e.g. omits small programs,
- Even when data summaries are appropriate to an institution, there is not a direct way to assess "how good is good enough," relative to an institution's mission,
- Accrediting agencies do not have clear direction from NACIQI that would help them prepare for questions about the dashboard.

There does seem to be agreement on a general goal, that students should benefit from educational experiences, and that institutions should be able to account for this benefit.

Findings

The summary below outlines the findings in more detail.

1. Data Collection

There are data gaps in the existing NACIQI dashboard, including

- difficulty in obtaining reliable job placement rates,
- difficulty in estimating retention and graduation rates for students who are not first-time full time freshmen,
- difficulty in estimating retention and graduation rates for graduate-level programs,
- concerns about the accuracy and relevance of current financial indicators on the dashboard.
- Difficulty in assigning debt and earnings to specialty accreditors.

2. Interpretation of Metrics

- There is a need for more rigorous analysis, for example so that contributory causes can be associated with effects. *Why are graduation rates the way they are?*
- It is important to consider student intent when assessing outcomes. Intent may often include economic outcomes, but personal growth is a valid outcome as well.
- There is a diversity of institutional types that should be accommodated by evaluating student achievement with respect to institutional mission. In particular,
 - providing access to education should be considered, and
 - costs and benefits to students vary by institutional type, and should be considered together when analyzing student achievement.
- In some cases, absolute judgments (e.g. licensing test minimum pass rates) are appropriate, but in other cases, relative measures are typical. For example, institutions may benchmark themselves versus similar institutions, even though they all have low student achievement rates in absolute terms. There should be additional justification besides just peer benchmarking, for example a comparison of costs and risks to average outcomes.
- The importance of peer review and variation by sector or agency type was noted.

Taken together, these considerations suggest a model of student achievement (see schematic) that includes student intent, net price, and academic qualifications as inputs, and outcomes that include intermediate success (e.g. first year retention), completion, and post-graduation outcomes. The outcomes are relative to the inputs. For example, do intended or advertised

outcomes match student expectations and needs? Lower graduation rates are more reasonable if students don't intend to graduate and the program is low cost.

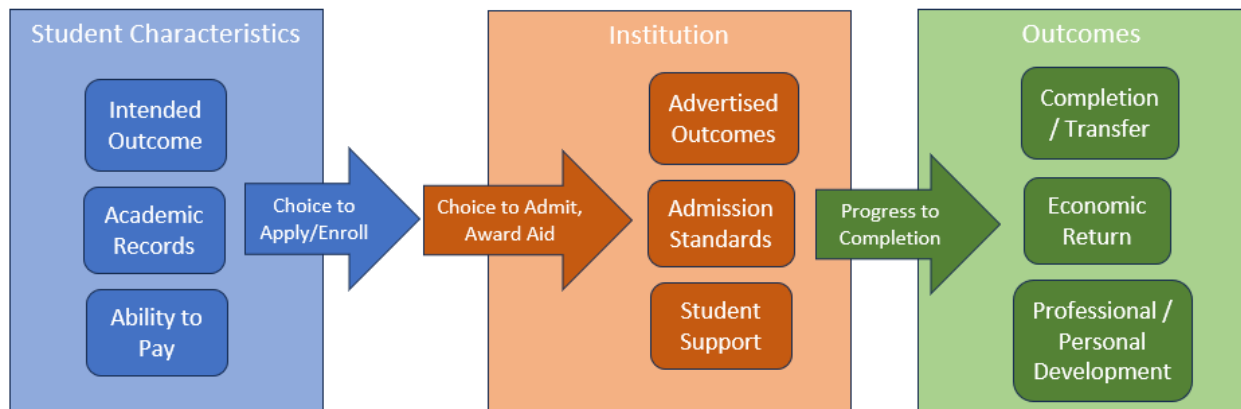


Figure 1. A simplified schematic of student and institutional characteristics leading to outcomes.

Only the Outcomes box in Figure 1 is accessible (in part) from the NACIQI dashboard and primarily from institutional accreditors. This observation suggests that it is unrealistic to assess agency's oversight of institutions or programs solely from the summary metrics. Because of the importance of institutional mission and diversity of student types, it seems that data about student characteristics (including intentions) and institutional data are necessary to make informed judgements about an agency's status as an authority on institutional quality.

It is now common practice to review return on investment (ROI) for the cost of a degree (most do not consider the students' time investment), but this may more generally be seen as educational benefits in comparison to risks taken on by students (time spent and debt incurred, for example). Since the risks are jointly decided by students and institutions, better summaries of these via accrediting requirements could make the dashboard outcome measures more meaningful. This type of analysis can lead to granular institutional improvements, for example in modifying admissions or financial aid policies to improve success rates for students who are assuming the most risk. Such an approach seems to align with the continuous improvement philosophy endorsed by most agencies.

Recommendations

- NACIQI should consider including guidelines in the Register notice for agencies to use the dashboard. See the Appendix for an example of how this was done in the past.
- The Department should see if some of the gaps in success measures can be filled in, most importantly the retention and graduation rates for non-first-time-full-time students. For example, could some of that information come from the National Student Clearinghouse?
- The Department should work with its outside vendor to build the dashboard for specialty accreditors that the sub-committee has requested.

- It may be useful for NACIQI to provide advice on H.R.2957, the [College Transparency Act](#), since it overlaps with these recommendations.
- NACIQI should continue to meet with accrediting agencies outside of Department meetings to further develop the usefulness of the NACIQI dashboard by (1) seeking agreement on uses of the current dashboard, (2) prioritizing improvements to the dashboard, and (3) develop the idea of integrating institutional data to assess student risks as context for rewards.

Application for Renewal of Recognition—State Agency for the Approval of Public Postsecondary Vocational Education

Puerto Rico State Agency for the Approval of Public Postsecondary Vocational, Technical Institutions and Programs.

Reducing Regulatory Burden in Accreditation

Update from the U.S. Department of Education on efforts to reduce regulatory burden and improve efficiencies in the accreditation program.

Oversight of For-Profit Institutions' Conversions to Non-Profit Entities

NACIQI received a letter from U.S. Senators Warren, Brown, Murray, Durbin, and Blumenthal, regarding their concerns of for-profit institutions converting to, or attempting to convert to, non-profit entities in order to avoid regulatory scrutiny. This letter is available at: <https://sites.ed.gov/naciqi/files/2018/03/2018.01.11-Letter-to-NACIQI-re-sectorial-conversions.pdf>. NACIQI will discuss this letter and the issues it raises at the meeting.

Presentation on Outcome Measures (OM) Component of the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) for Inclusion in the Accreditor Dashboards

Presentation by the Western Association of Schools and Colleges, Senior Colleges and University Commission (WSCUC)

WSCUC will present on its Graduation Rate Dashboard tool (GRD), and how the agency uses outcome measures, such as the GRD, as part of its accreditation process. This presentation is responsive to NACIQI's line of inquiry into how accrediting agencies use data to inform the accreditation process.

Subcommittee on Data

The subcommittee on data will report out on its activities since the last NACIQI meeting.

Meeting Discussion

In addition to following the HEA, the FACA, implementing regulations, and the NACIQI charter, as well as its customary procedural protocols, NACIQI inquiries will include the questions and topics listed in the pilot plan it adopted at its December 2015 meeting. A document entitled "June 2016 Pilot Plan" and available at: <http://sites.ed.gov/naciqi/files/naciqi-dir/2016-spring/pilot-project-march-2016.pdf>,

provides further explanation and context framing NACIQI's work. As noted in this document, NACIQI's reviews of accrediting agencies will include consideration of data and information available on the accreditation data dashboards, <https://sites.ed.gov/naciqi/files/2017/09/Institutional-Performance-by-Accreditor-June-2017-Corrected.pdf>. Accrediting agencies that will be reviewed for renewal of recognition will not be on the consent agenda and are advised to come prepared to answer questions related to the following:

- Decision activities of and data gathered by the agency.
 - NACIQI will inquire about the range of accreditation activities of the agency since its prior review for recognition, including discussion about the various favorable, monitoring, and adverse actions taken. Information about the primary standards cited for the monitoring and adverse actions that have been taken will be sought.
 - NACIQI will also inquire about what data the agency routinely gathers about the activities of the institutions it accredits and about how that data is used in their evaluative processes.
- Standards and practices with regard to student achievement.
 - How does your agency address "success with respect to student achievement" in the institutions it accredits?
 - Why was this strategy chosen? How is this appropriate in your context?
 - What are the student achievement challenges in the institutions accredited by your agency?
 - What has changed/is likely to change in the standards about student achievement for the institutions accredited by your agency?
 - In what ways have student achievement results been used for monitoring or adverse actions?
 - Agency activities in improving program/institutional quality.
 - How does this agency define "at risk?"
 - What tools does this agency use to evaluate "at risk" status?
 - What tools does this agency have to help "at risk" institutions improve?
 - What can the agency tell us about how well these tools for improvement have worked?

To the extent NACIQI's questions go to improvement of institutions and programs that are not at risk of falling into noncompliance with agency requirements, the responses will be used to inform NACIQI's general policy recommendations to the Department rather than its recommendations

regarding recognition of any individual agency.

The discussions and issues described above are in addition to, rather than substituting for, exploration by Committee members of any topic relevant to recognition.

Submission of Requests To Make an Oral Comment Regarding a Specific Accrediting Agency or State Approval Agency Under Review, or To Make an Oral Comment or Written Statement Regarding Other Issues Within the Scope of NACIQI's Authority

Opportunity to submit a written comment regarding a specific accrediting agency or state approval agency under review was solicited by a previous **Federal Register** notice published on January 24, 2018 (Vol. 83, No. 16). The comment period for submission of such comments closed on February 16, 2018. A second notice was published on February 22, 2018 (Vol. 83, No. 36) extending the written comment period until March 1, 2018 for the Accrediting Council for Independent Colleges and Schools and the American Bar Association, Council of the Section of Legal Education and Admissions to the Bar. Subsequently, a corrected notice was published on February 28, 2018 (Vol. 83, No. 40) clarifying the scope of written comments that could be submitted regarding the Accrediting Council for Independent Colleges and Schools and the American Bar Association, Council of the Section of Legal Education and Admissions to the Bar. Because all deadlines have passed, no further written comments regarding a specific agency or state approval agency under review will be accepted at this time. Members of the public may submit written statements regarding other issues within the scope of NACIQI's authority for consideration by the Committee in the manner described below. No individual in attendance or making oral presentations may distribute written materials at the meeting. Oral comments may not exceed three minutes.

Written statements and oral comments concerning NACIQI's work outside of a specific accrediting agency under review must be limited to the scope of NACIQI's authority as outlined under section 114 of the HEA.

There are two methods the public may use to request to make a third-party oral comment of three minutes or less at the May 22–24, 2018 meeting. To submit a written statement to NACIQI concerning its work outside a specific accrediting agency under review, please follow Method One.