Over the past year, the members of NACIQI identified the need to extend its formal policy agenda. With the 2012 NACIQI Policy Recommendations over two years old, and with a renewed focus on concerns in higher education and the HEA reauthorization, we set out to identify the new, or renewed, areas about which we would recommend policy change.

To develop our agenda, we drew not only on the 2012 NACIQI Policy Recommendations, but also on the expertise of a number of policy and thought leaders in higher education through invited policy papers, background readings, and panel presentations. We identified specific areas about which we thought that additional recommendations were needed at this time to simplify the accreditation and recognition process and to enhance nuance in that process, to reconsider the relationship between quality assurance processes and access to Title IV funds, and to reconsider the roles and functions of NACIQI itself. We approached these areas with issues of access, innovation, affordability, and quality in mind. We have not included consideration of what Committee, staff, Department, regulation, or statutory actions would be needed to move these recommendations to implementation.

In advancing the series of recommendations, we commend to the reader the 2012 NACIQI Policy Recommendations, which provides recommendations that remain important to consider. The new set of recommendations, below, represents additional contributions to the larger policy conversation in service of enhancing our higher education system for all students.

We advance this set of draft recommendations for public comment and input, and look forward to learning from the perspectives of the many stakeholders in the accreditation and recognition process.

Toward simplifying and enhancing nuance in the accreditation and recognition process

To begin, we noted the wide variance that exists in accreditation terminology, processes, and timelines across accrediting agencies. This variance results in confusion and a lack of transparency and does not appear to serve the public interest well. To address this, we see a
need for more conformance across the accreditation process, including more concise, factual
self-studies and other final reports that are supported by technology, to better serve the public
and provide more transparency to the accreditation process. We recommend:

1. Ask accreditation agencies (both programmatic and institutional) to develop common
definitions of accreditation actions and terms procedures, timelines, process (i.e.,
electronic) including due process and substantive change.

We also support initiatives to evaluate and assess the impact of Departmental regulations
(criteria and recognition procedures) on the accreditation process with the intent to streamline
the regulations, eliminate duplication, and to minimize the regulatory burden. We recommend:

2. Require a periodic Departmental review of the criteria for recognition (regulations).

We also noted that the current review structure for accreditation, and also for recognition, is
too rigid to adequately address the uniqueness of institutional missions. There is a need for a
more differentiated process that allows for different levels of accreditation, for more
transparency and openness in the accreditation and the recognition processes, and a greater
emphasis on student achievement and student outcomes. Specific standards-setting authority
within those mission-essential areas lies expressly with the accrediting agency. We
recommend:

3. Re-focus NACIQI reviews to direct greater attention to assessing the role of an
accrediting agency in ensuring the health and well-being and the quality of institutions
of higher education and their affordability, rather than on technical compliance with
the criteria for recognition. These reviews should be supported by staff analysis that
focuses on the effectiveness of the accrediting agency in performing its work, rather
than technical compliance.

4. Direct NACIQI to identify the essential core elements and areas of the recognition
review process that accrediting agencies are required to take into account for
recognition purposes, focusing of student learning and student outcomes. It is
expected that NACIQI would identify both the essential areas to include in the
recognition process as well as those to exclude.

5. Grant accrediting agencies greater authority to develop standards tailored to
institutional mission; to create different substantive tiers of accreditation; and to use
different processes for different types of institutions, including expedited processes.
6. Establish that the recognition review process differentiate among accrediting agencies based on risk or need with some identified as requiring greater levels of attention, and others lesser.

7. Establish that recognition recommendations and decisions include different gradations of approval of accrediting agencies and different recommendations as to the amount of time within which an agency is allowed to achieve compliance.

In advancing the interest in transparency, we also repeat here a recommendation made in the 2012 NACIQI Policy Recommendations:

8. Make accreditation reports about institutions available to the public. Further discussion is needed about what reports to include, and about how to increase information and transparency while sustaining other critical values in the accreditation process

Toward reconsidering the relationship between quality assurance processes and access to Title IV funds

We noted that routes to accessing Title IV funds are currently restricted to existing systems and structures that may not provide sufficient flexibility for innovation and progress. We recommend:

9. Afford institutions the widest possible array of choice of accreditor for access to Title IV funds. Encourage place-based accreditation agencies to expand their scope. Provide greater flexibility for institutions to re-align themselves along sector, institution-type, or other appropriate lines.

We noted the need to provide ways for new and innovative mechanisms of quality assurance to surface and to serve as potential guarantors of quality. We recommend:

10. Allow for alternative accrediting organizations.

We see an opportunity to create a risk-adjusted approach to accreditation that would free up accrediting agencies and the Department to have more time and resources to focus on institutions that pose the greatest quality concerns. We recommend:

11. Establish less burdensome access to Title IV funding for high-quality, low-risk institutions.
We envision that a less burdensome route to Title IV funding access would entail expedited recognition, possibly through a simplified data reporting process. To insure that data is relevant and useful, and that reporting is accurate, we recommend:

12. Before eligibility for Title IV, require institutions to provide audited data on key metrics of access, cost and student success. These metrics would be in a consistent format across institutions, and easy for students and the public to access.

We see a need for a differentiated approach to access to Title IV funds, such that new institutions could more quickly receive partial benefit from these funds, while still providing some protection for taxpayer investment in higher education. Institutions that pose the greatest quality concerns would receive more attention in the review process, while the burden of complying with accreditation would be lesser for high-quality, low financial risk institutions.

13. Establish a range of accreditation statuses that provides differential access to Title IV funds.

Toward reconsidering the roles and functions of the NACIQI

We have noted a growing concern that, in many ways, the NACIQI currently has relatively little authority to improve the process and quality of higher education. While the HEOA mandate suggests a central role, the NACIQI is captive to the current process that leaves all decisions to the Department. NACIQI’s current role is ministerial, but not significant. The Department does not utilize the expertise of its NACIQI members nor entrust it to make decisions, and as a result, NACIQI’s efforts and contributions are, at best, blunted.

We recognize that decisions on many of the recommendations above would be necessary to fully shape a more effective role for NACIQI. Pending that outcome, we think it is necessary to clarify and better define the role and each step regarding the NACIQI’s role going forward and to ask what assessment options best ensure that an adequate level of quality education is offered by the institutions accredited by a recognized accreditor. We recommend:

14. Reconstitute the NACIQI as a committee with terminal decision-making authority and a staff. This will establish NACIQI as the final decision-making authority on accrediting agency recognition. In addition, ensure that the staff recommendation is provided to the NACIQI for its consideration and that the NACIQI decision will be the singular final action communicated to the Senior Department official.
15. Establish that in the event of an accrediting agency’s appeal of the recommendation, NACIQI, sans Department staff, will respond to the accrediting agency’s appeal submittal to the Department.

We also suggest that the work of the NACIQI could be enhanced with the perspectives of members who are outside of the various parts of the education community.

Finally, we expect that facilitating an improved communications process will require better-defined and clearer communication opportunities between the Department and NACIQI and other policy bodies. We recommend:

16. Establish that the NACIQI and the Education Secretary and other Department officials meet periodically for mutual briefings and discussions, including policy issues such as “gainful employment,” and resulting in policy recommendations.

17. Establish that the NACIQI, itself, timely disseminates its reports to the Department and to the appropriate Congressional committees.