

Commission on Institutions of Higher Education Standards Revision Discussion Paper: 2015

Background Information

As specified by its policy and in light of the important changes in higher education and public expectations for accreditation, the Commission has undertaken a comprehensive process that will lead to a revision of the *Standards for Accreditation*. The Commission's current Standards were adopted in 2005; in 2011 they underwent modest revisions, based on feedback from member institutions and the Commission's experience.

What follows includes a summary of the preliminary activities laying the groundwork for this revision, along with the articulation and discussion of a number of thematic issues that the Commission has identified for further exploration. Many comments and suggestions have already been offered for the Standards revision and more are invited and welcomed. In addition to a general overview of the Commission's approach to revising the standards, the principal focus of this paper is on the larger issues, each of which may cut across two or more of the existing (and perhaps revised) Standards.

To clarify these issues and further determine how they will be addressed in the revised Standards, the Commission seeks participation and ideas from member institutions and other communities of interest, including members of the public. The Commission will initiate the consideration of the issues in this paper through a variety of activities. The paper is also freely and publicly available, and the Commission welcomes reactions and comments from others, as indicated at the end of this paper. The Commission's website (<http://cihe.neasc.org>) provides further information on the process and updates on the progress. This website also includes information about the Commission and provides access to the current Standards. When revised Standards are drafted, they will be posted to this website, with an invitation for comments and suggestions.

Commission Mission: The Commission is the higher education accreditation body of the New England Association of Schools and Colleges (NEASC). The stated mission of the Commission is:

The Commission develops, makes public and applies criteria for the assessment of educational effectiveness among institutions of higher education leading to actions on their institutional accreditation. By this means, the Commission assures the education community, the public and interested agencies that accredited institutions have clearly defined objectives which meet with criteria published by the Commission; that they have the organization, staffing and resources to accomplish, are accomplishing and can continue to accomplish these objectives. In addition, through its process of assessment, the Commission encourages and assists in the improvement, effectiveness and excellence of affiliated educational institutions.

This statement reflects the historical dual purposes of regional accreditation: to provide quality assurance through a program of periodic institutional evaluation, and to promote institutional improvement.

Because NEASC is a membership organization, the Standards are responsive to the expressed ideas of the Commission's accredited and candidate institutions. And because regional accreditation is a means of self-regulation that works in the public interest, the Standards may also be said to represent the articulation by the New England higher education community of the characteristics and behavior of those institutions of higher education that deserve the public trust.

Because the Commission is recognized by the U.S. Department of Education as a "reliable authority on the quality of education," the Commission's *Standards for Accreditation* must reflect the regulatory requirements that accompany its status as a gatekeeper for federal financial aid for students at accredited and candidate institutions.

The Commission is undertaking this process at a time of great change in American higher education and striving to articulate *Standards for Accreditation* for the next decade, with a mid-course revision. Hence, the Commission will pay particular attention to changes in technology, finance, demographics, and public expectations for higher education, as well as ensuring that the Standards appropriately address institutional capacity and enterprise risk management.

Preliminary Work. The articulation of the issues identified in this paper follows prior work of the Commission in the Standards revision process. At its June 2014 retreat, the Commission heard from a panel of experts on the external atmospherics for higher education and the changing public expectations for higher education. Commission members reviewed a series of documents, including Reflective Essays on what students have gained as a result of their education, a proposal for a direct assessment competency-based degree program, and the standards and processes used by the other regional accrediting bodies.

The Commission then articulated some broad outlines for the revision:

- The Standards should: 1. continue to be mission-centric. 2. emphasize outcomes increasingly, much more than inputs, especially student learning. 3. leave plenty of room for innovation (which should be mission-compatible). 4. increase the expectation for accountability. 5. increase the expectation for transparency.
- The Commission should: 6. consider having fewer standards – by combining and revising current standards. 7. keep a simple, clear process so that institutions focus on the content and not the process. 8. consider whether to separate compliance from improvement. 9. ensure the standards allow for a differentiated process with institutions. 10. reflect expectations for quality in competency-based education.

These commitments clarify that the Commission is responsive to the increasing expectation that accreditation serve the public interest through a greater focus on student

learning and that it ensures a system of accountability and transparency. At the same time, the Commission seeks to ensure that accreditation serves each institution through mission-centric Standards, and a process that promotes institutional improvement as well as assuring quality.

The Commission has also made a commitment that the revised Standards will not be longer than the current Standards.

The Commission also affirms that:

- The Standards represent aspirational goals that should be met at least minimally. Thus, while every institution can identify areas in the Standards on which it seeks to improve, every institution must meet each Standard at least at a minimal level.
- The approach to accreditation, being mission-centric, supports institutional autonomy. The Commission will continue to honor and support institutional diversity and the requisite autonomy for institutions to meet the Standards in light of their mission.
- The Standards are written as declarative sentences. They contain no “must” or “should” statement; rather, the Standards describe the functioning of an institution worthy of accreditation.
- The Standards apply to the entirety of the institution’s academic program: all students, all faculty, all locations, all modalities.
- The Standards are largely qualitative and will remain so. Words such as “appropriate” indicate that institutions are expected to meet the Standards in ways consonant with their mission.
- The Commission continues to value innovation supported by evidence of effectiveness. The ability to innovate and change, done responsibly, is a treasured hallmark of American higher education.
- Because the accreditation decision is prospective and because the goal is to develop Standards that will be in effect for a decade, the Standards should reflect, insofar as is possible, those expectations that are likely to be important not just now but also for the next several years.

In October and November 2014, representatives of member institutions were invited to a series of eight meetings around the region and one in London for international institutions to review the current standards and the context for standards revision. Many useful comments were submitted regarding the current Standards (what works well, what doesn’t) and the membership’s desires for the revised Standards (what should be included and what should not be). The discussion and written feedback from individuals and groups, along with the experience of the Commission with changes in higher education were key to identifying the issues below for further consideration before any draft of a revised set of *Standards for Accreditation* is prepared.

Institutions and accreditation must work systematically to retain the public trust. The Commission understands the importance for the New England higher education community and our international members of ensuring that the *Standards for Accreditation*, and the way they are applied, are deserving of public trust and confidence.

Thematic Areas for Consideration

The titles given to these thematic areas are suggestive of the underlying issues, each of which cuts across organizational boundaries of institutions and arguably, at least, is related to two or more of the current *Standards*. One purpose of this paper is to begin to frame the issues. Through participation of member institutions and interested others, the issues will be further elaborated in the process of *Standards* revision, and indeed this participation will be crucial in identifying those aspects of each issue which are important to reflect in the revised *Standards for Accreditation*.

1. Student Achievement and Success: The 2007 mid-course review of the Standards resulted in the addition of this part of the standard on Planning and Evaluation: “Based on verifiable information, the institution understands what its students have gained as a result of their education and has useful evidence about the success of its recent graduates. This information is used for planning and resource allocation and to inform the public about the institution.” (2.7) Beginning in 2011, institutions completing their fifth year interim report were asked to include a Reflective Essay of 15-20 pages addressing one or more of the following:

1. What students gain as a result of their education: “Based on verifiable information, the institution understands what its students have gained as a result of their education and has useful evidence about the success of its recent graduates.” (*Planning and Evaluation*, 2.7)
2. Assessment of student learning: “What and how students are learning” (*The Academic Program*, 4.48-4.54)
3. Measures of student success, including retention and graduation (*Students*, 6.5-6.9)

In general, the Commission has found that the Reflective Essays represent a stronger way for institutions to use the accreditation process to focus on their understanding of achievement and success for their students. Because institutional missions and the compositions of the student bodies vary greatly among the membership, the particular findings in the Essays also vary greatly. Because the Commission is committed to increased attention to student learning, accountability, and transparency in the revised Standards, it will be useful to draw upon recent experience of institutions with the Reflective Essay – and self-studies – to consider how these topics should be represented in the revised *Standards for Accreditation*.

Questions to consider include:

- Are the three topics outlined above – what students gain, assessment of student learning, and measures of student success including retention and graduation – the appropriate way to group an increased emphasis on student achievement?
- What have institutions that have completed a Reflective Essay learned in the process that can be helpful in the revision of the Standards?
- The Standards are designed to apply to all students, all locations, all modalities of instruction (including competency-based education). How should that be clarified in the Standards?

- The Standards frame “assessment” as essentially a private activity for institutional improvement, and the Commission is more interested in the thoroughness and validity of the process and the extent to which institutions have developed systems that lead to changes in curriculum, instruction, or services for students than in the specific findings of the assessments. Is this the right approach? Do the Standards and processes convey this expectation clearly?
- IPEDS retention and graduation rates are very useful for some institutions – those with primarily first-time full-time students – and close to useless for others. The National Student Clearinghouse now makes available information that can help all institutions track the educational paths of their students more completely. What implications does this resource have for the Commission’s Standards? Are there other data that should be included to provide a clearer picture of an institution’s students and their path(s) to success?
- How should retention and graduation rates be considered for graduate students? Students in competency-based programs? Part-time students? Students in online programs?
- What are reasonable expectations – and aspirational expectations – that institutions know about their recent graduates?
- How should institutions be expected to make information on student success available to the public?
- What other ideas or principles in this area should be included in the revised Standards?

2. Faculty: Roles and Composition. In the classical model of a college or university, faculty are full-time, tenured or on the tenure track. They work together in organized structures such as departments and curriculum committees as part of shared governance to construct and oversee the curriculum. They develop and teach the courses, assess student learning, and stay in touch with many of their graduates long after they leave the institution. These full-time faculty members are responsible to evaluate and improve the curriculum and instruction. Their interactions are formal (e.g., through committees) and informal (e.g., hallway conversations). Together they constitute a group that has all of the experience needed to oversee the curriculum and evaluate its effectiveness with respect to student achievement. An external perspective – consultants, specialized accreditation, academic and professional societies, the identification of peer institutions and benchmarks – supports these faculty members in overseeing and ensuring quality.

In New England, some institutions continue to operate this way. Some never have, relying from the first on part-time faculty. Others once relied on the classical model, but for reasons primarily financial do so less and less as the proportion of part-time and adjunct faculty increase. Still other institutions have, at least in part, deconstructed the faculty roles so that different individuals are responsible for curriculum development, course development, instruction, coaching, advising, and assessment.

Questions to consider include:

- Is the Commission’s current standard on *Faculty* sufficiently open to multiple models of faculty appointment?

- In institutions with large proportions of part-time or adjunct faculty, what responsibility, if any, does the accredited institution have for faculty development and evaluation for these appointments? For including part-time or adjunct faculty in governance?
- Where there are large numbers of part-time or adjunct faculty, how should the Commission articulate its expectation for faculty ownership of and responsibility for the quality of the curriculum, as improved through feedback from an effective system to assess student learning outcomes?
- When faculty roles are de-constructed, what should the Commission's expectation be for feedback loops connecting those who construct the curriculum with those who teach/mentor/coach students and those who assess student learning?
- Are these expectations different for competency-based education than for the traditional model?
- Should this Standard address "instructional staff" and academic support personnel as well as faculty?
- What else is important to consider here?

3. Partnerships: with institutions, for-profit entities, and others. In the classical model, colleges and universities operate as stand-alone entities. They develop and offer an academic program, relying on outside entities for a prescribed set of functions that might include the production of textbooks and library resources and possibly off-campus locations for internships and service-learning opportunities. While some institutions – or parts of institutions – still operate in this mode, others are more cooperative – some would say entangled – with other entities: sister institutions in a system, parents (and perhaps siblings) in a corporation, higher education partners for dual or joint degree programs. A few have contractual relationships with non-accredited entities involving courses and degrees, though the Commission has been quite cautious in approving such arrangements. The development of on-line learning saw the rise of commercial operations eager to share the wealth of new enrollments by offering services that ranged from generating student leads to virtually (pun intended) offering the curriculum. Another example of a partnership involves organizations that recruit international students and then partner with accredited institutions on ensuring those students are fully prepared for the academic work that counts for a degree.

Because accreditation ultimately places responsibility for the academic program with the accredited institution, with respect to partnerships, the Commission has drawn the line so that the accredited entity must be responsible for the content of advertising and promotion; the admission of students; the oversight of the curriculum; the hiring, supervision and retention of instructors; and the assessment of student learning. The clearest explication of the Commission's expectations is here:

The institution demonstrates its clear and ongoing authority and administrative oversight for the academic elements of all courses for which it awards institutional credit or credentials. These responsibilities include course content and the delivery of the instructional program; selection, approval, professional development, and evaluation of faculty; admission, registration, and retention of students; evaluation of prior learning; and evaluation of student progress, including the awarding and

recording of credit. The institution retains, even with contractual or other arrangements, responsibility for the design, content, and delivery of courses for which academic credit or degrees are awarded. The institution awarding a joint, dual, or concurrent degree demonstrates that the program is consistent with Commission policy, and that the student learning outcomes meet the institution's own standards and those of the Commission. (4.32)

Questions to consider include:

- Are the Commission's Standards and expectations clear with respect to institutional partnerships?
- Are there consortial arrangements that should also be acknowledged in the Standards?
- Are there other types of partnerships now or on the horizon that should be addressed by the Standards?
- Should the standard on *Organization and Governance* be clearer about partnerships? The standard on *Public Disclosure? Integrity? Financial Resources?*
- Here and in the Standards and Commission policy, the term partnership is used to address any formal arrangement (e.g., with an MOU, MOA, or contract) between the accredited institution and a non-regionally accredited entity. Is that distinction appropriate and clear? How would it apply to public institutions in a system or institutions that are part of a corporation?
- Should the self-study or the interim report ask institutions specifically to address the academic quality of any partnership arrangements?

4. Competency-Based Education, Prior Learning Assessment, and “Credits from Elsewhere” In the traditional model, students enter college as first-time full-time students and earn all of their credits from the institution awarding their degree. Many colleges – and many students – still follow this model. Broadened enrollment to ‘non-traditional’ students and ways for students to enter college with credits in hand that complicated the model – for example, AP and CLEP exams – have been around for decades. As the adult proportion of the student body has increased and the national expectation arose that more Americans have a college certificate or degree, there has been more interest in recognizing learning and achievement that happens beyond the campus. Recently interest has grown in developing programs that let students earn a degree through demonstrating competencies, in some cases in programs untethered to semesters or credits (i.e., programs offered through direct assessment). Also, there exist ways for students to earn credits or have learning turned into credit recommendations through commercial enterprises (e.g., StraighterLine), higher education consortia offering MOOCS (e.g., edX), and credit recommendations from the American Council on Education (i.e., CREDIT) for experiences gained through military service or employment. CAEL, which oversees prior learning assessment, claims research shows that students who earn credits through PLA are more likely to graduate than students who do not.

Questions to consider include:

- How should these paths be represented in the Commission’s standards, and where should they be located?
- The Commission expects that student achievement for someone who earns a degree through a competency-based program is equivalent to that of a student who earns a degree through a conventional credit-based program. How should institutions be expected to validate the quality of their competency-based degree in regards to this assumption?
- When institutions accept a large number of credits from a non-accredited entity, what should be the Commission’s expectation for validating that the decision was a good one educationally? Does this expectation differ in any way from credits accepted through transfer agreements? Dual enrollment programs? What are the best practices now and what should they be going forward?
- What data should the institution be expected to present on the number of credits accepted or awarded from outside entities, and how should those data be presented and analyzed?
- What aspects of the Commission’s Policy on Dual Enrollment should find their way into the *Standards for Accreditation*?
- In part because a master’s degree can be earned through as few as 30 credits, the Commission’s standards currently do not accept credit for prior learning at the graduate level. Some fields – e.g., business and social work – have developed dual tracks in a graduate program, one for students with prior study or significant work experience and a longer one for newcomers to the field. What should the Commission’s standards expect in this regard?

5. Technology, including the library and distance education. The Fall 2014 regional meetings to discuss the Standards revision revealed that large numbers of institutions feel that the current Standards are arguably most in need of updating when it comes to matters related to the library and technology, often expressed as a concern over how Standards 7 *Library and Other Information Resources* and 8 *Physical and Technological Resources* work together. Or don’t. Also mentioned frequently was the observation that the language used to address programs offered online seems outdated. Technology now undergirds so much of what an institution does that it is a fundamental resource, in its importance not unlike the buildings, classrooms, and laboratories. Data security has become a major concern of institutions. Some institutions no longer have libraries – they have a Learning Commons or some other arrangement to offer learning resources to students. And despite a shift in the standards to encourage a greater emphasis on students gaining skills of information literacy, many self-studies still concentrate on the input side of the ledger when it comes to information resources. Questions to consider include:

- Should there continue to be a separate standard on the Library? If not, what should be kept from the current standard and where should it go?
- Should matters related to technology be included in a revised Standard 8 or should they be disbursed to other standards, and if so, which ones? Should the technology for teaching and learning be addressed within a Standard separate from administrative technology?

- Would it be helpful to have one standard on financial, physical, and technological resources? Should human resources be included? Or is that too much? Are financial resources so key to the well-being of institutions that the area should continue to have its own standard?
- Cyber-security is a big issue on campuses today. How big a deal should it be in the *Standards for Accreditation*?
- What should be said in 2015 about online education in the *Standards for Accreditation*? Should online education matters be woven into the Standards or addressed together in one section?
- How should the standards reflect that many institutions have two or more distinct student bodies (e.g., those on campus and those studying at a distance)? How should the programs and services for these student bodies be addressed in the self-study, and how can the *Standards for Accreditation* be articulated in a way that supports the institution looking at all students, all locations, all modalities?

Further Steps in the Process

The Commission looks forward to the participation of member institutions and interested others in the process of Standards revision. Full and frank discussion will result in further strengthening of regional accreditation in New England. Following feedback from this paper and any other pertinent matters, the Commission will develop a draft of the revised Standards, and involve the membership and interested others in providing feedback on the draft. (A copy of the Commission’s current Standards for Accreditation may be found on its website: <http://cihe.neasc.org>.)

Institutions and interested others are invited to submit their comments about the issues outlined in this paper or other matters pertinent to the Standards and their revision. Please send comments in writing—by mail, written comments delivered at a meeting, or e-mail – with identification of the individual or institution submitting comments.

The Commission’s address is: CIHE of NEASC, 3 Burlington Woods Drive #100, Burlington, MA 01803.

E-mail comments may be sent to cihe@neasc.org. Please put “Standards Revision” in the subject line, and include your identification information.

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