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Before the U.S. Senate Committee on Health, Education, Labor and Pensions (HELP)

June 17, 2015

On behalf of the Board of ACICS, our more than 900 colleges and schools throughout the U.S. and internationally, and the more than 800,000 students enrolled, my appreciation for the opportunity to contribute to the Senate's sincere efforts to strengthen the system of post-secondary education in the U.S. through the reauthorization of the Higher Education Act in general, and through the thoughtful reform of the system of accreditation in particular. As the nation's community of learners and employers has evolved, so have the methods for delivering effective post-secondary education; so too must the discipline of quality assurance evolve and reform.

Founded in 1912, ACICS is the largest national accrediting organization of degree granting institutions. ACICS is authorized to accredit professional, technical and occupational programs through the master's degree level by the U.S. Department of Education and Council of Higher Education Accreditation (CHEA). ACICS has been continuously recognized by the U.S. Government since 1956 as a reliable authority on institutional quality and integrity.

As a recognized national accreditor, ACICS is not constrained by geographic boundaries or territories. Currently we assure the quality of colleges and schools in 47 states and more than a dozen international locations. ACICS has developed standards and the capacity to review new and emerging education delivery modes, including on-line instruction, international education and competency-based education. As the colleges and schools adapt new modes of serving a dynamic student population, ACICS is poised to respond with flexibility and innovation in the quality assurance discipline.

Today I offer three considerations to inform the legislative task of reauthorizing the Higher Education Act and strengthening the system of voluntary quality assurance known as accreditation:

1. **Know the students**, understand their unique needs and circumstances, and use that knowledge to shape higher education policy, as ACICS uses that knowledge to shape requirements and expectations for assuring quality and institutional effectiveness.

**2. Inventory the depth of rigor and review** that is applied through the quality assurance process and build policy that empowers and strengthens the value of that process.

**3. Encourage the accreditation community** to play a broader role in defining the measures of value incorporated in the price/value proposition. This role is uniquely the obligation of accreditation, and when it is played effectively, the relationship between price and value is kept in balance.

**Regarding the consideration of knowing the students:** The more than 800,000 students served by the more than 900 private, independent colleges and schools accredited by ACICS represent an important and growing subset of the overall population of learners who enroll in post-secondary education across the U.S. They are typically working adults, financially independent from their parents, with one or more dependent children at home, and many are first in their families to have attempted a post-secondary education. More than half of them live, work and attend institutions located in secondary and tertiary markets: communities of population less than 500,000, and in many cases less than 150,000. (2015 ACICS Eligibility Application to CHEA).

Compared with students enrolled in traditional higher education, students enrolled at ACICS colleges and schools tend to have lower income levels and come from more modest means. They typically are looking for enrollment opportunities that are compatible with their lifestyles: campuses in close proximity offering classes at night or weekends taught by instructors with practical as well as academic experience in the field. They also require a level of student services – help with transportation, day care, social services and educational support – that may not be commonly available at other institutions. Many will suspend their post-secondary education due to changes in their life circumstances, such as the demands of their family or their workplace.

Typically students enrolled at ACICS accredited colleges and schools are seeking terminal credentials; that is, their goal is to complete the requirements for a diploma, certificate or degree in a timely manner, then convert the credential into employment. Due to aspirations for higher credentials by many students, ACICS works closely with other institutions and accreditation agencies to maximize the opportunities for the transfer of academic credit. The CHEA “Framework for Transfer of Credit Responsibilities and the “Joint Statement on the Transfer and Award of Credit” are important declarations which provide guidance to the accreditation community and to all accredited colleges and universities.

Students attending ACICS colleges and schools rely heavily on relationships and first-hand knowledge to make decisions about their lives and opportunities. Word of mouth is typically the most important method by which they gain information for making

enrollment decisions: that is, they ask their friends or relatives or other trusted sources to recommend a post-secondary school. ("Bridges Out of Poverty: Strategies for Professionals and Communities," Ruby K. Payne, Philip E. DeVol, aha! Process, Inc. 2006)

Of the cadre of more than 1,100 peer evaluators deployed by ACICS to perform on-site reviews, more than 130 have extensive expertise in the field of student services. They are diligent in applying the requirements that express the Council's expectations for serving students appropriately, regardless of their background or circumstance ("ACICS Accreditation Criteria," Sections 3-1-410 thru 414; 3-1-441, 442). At their disposal are more than 30 discrete items of inquiry that produce information the Council can utilize in reviewing the sufficiency of student services.

The accrediting council reviews information on a recurring basis derived from team reports, student complaints and adverse information from third parties to analyze the sufficiency of its standards and requirements regarding student services. When an analysis indicates patterns of deficiency, Council clarifies or strengthens its written standards and enforces the expectations through the accreditation review process.

Recently, the Council reinforced its focus on the experience of students, including those derived from student services. The Council's published value statement declares:

"ACICS is committed to the importance of a quality educational experience for all students."

The Council declaration deliberately focuses on the experience of students, as well as the quality of the academic content; it reinforces an emphasis on students who are currently enrolled, including the support they receive from the institution. This emphasis reflects a strong awareness of the type of students enrolled at member institutions and the unique circumstances and challenges they confront in completing a post-secondary education.

**Regarding the strength of the ACICS accreditation program:** As is true for all accrediting entities recognized by the U.S. Department of Education through the statutory authority of the Higher Education Act, ACICS stands for review every five years. The agency must demonstrate that it has standards and a program of applying those standards that comply with the ten categories of Section 602.16 (a) of the Department's regulations. Those regulations are comprised of 19 discrete sections and more than 90 individual requirements.

In addition, ACICS is recognized by the Council for Higher Education Accreditation (CHEA), which applies its expectations through twelve explicit standards and requirements. CHEA recognizes most of the regional accrediting bodies and more than

50 programmatic and specialized accrediting entities. ACICS has voluntarily stood for recognition and review by the Texas Higher Education Coordinating Board (2009); the National League for Nursing Accrediting Commission (now the Accrediting Commission for Education in Nursing, 2009); and the American Registry of Radiologic Technologists (ARRT, 2015). In all cases the independent reviews produced formal recognition of ACICS's ability to effectively assure the quality of institutions and professions of interest to those entities.

At the core of the ACICS program of accreditation are strong, explicit standards; a diverse and experienced cadre of peer evaluators; and an independent, professional Council whose composition reflects close ties to various community interests.

The 125-page ACICS standards, evolved over more than 102 years, tend to be more explicit and prescriptive rather than general or aspirational. Among other characteristics, the ACICS standards emphasize student-focused outcomes, including standards for retention, placement, and licensure exam pass rates. Institutions also are required to demonstrate how they engage the local community in developing and shaping their education programs; the satisfaction of employers with the graduates they hire; the satisfaction of graduates with the educational experience; and other indicators of student learning, such as cumulative grade point average, graded externships, portfolios and other capstone projects. On average, the typical ACICS colleges will be subject to a full team review every three to five years; the maximum grant length is six years, reserved for only those institutions that demonstrate strong compliance with all standards and requirements. In addition, institutions are required to file every year a report on student achievement factors and financial stability.

ACICS evaluators on average have nearly six years' experience serving as a peer evaluator; more than a third are drawn from colleges and schools unaffiliated with ACICS, including many that are accredited by regional entities. Indeed, many perform accreditation reviews for regional accreditors as well as ACICS. The primary tools they use to review colleges and schools on-site are the published standards and more than 425 discrete questions that are answered through interviews, direct observation and review of documentation.

Finally, the ACICS Council is composed of 15 individuals with substantial experience in post-secondary education. Four of the fifteen have no affiliation with any ACICS college or school; four have experience primarily in faculty roles; many have served on accreditation review teams for other accrediting bodies. All have a strong commitment to quality assurance that enhances the experience of students currently enrolled; the Council understands that students who have a strong experience today or this week or this semester stand a greater chance of completing the program and converting their financial, intellectual and emotional investment into economic opportunity.

**ACICS acknowledges the focus on the price/value proposition** of post-secondary education in various policy arenas, and respects the initiative behind reducing student indebtedness and the costs of attendance. While the Council collects and analyzes information regarding the average tuition and fees of programs at member institutions, ACICS has not developed standards regarding affordability or pricing levels. The numerator of the price/value proposition is outside of our purview, our area of expertise, and the authority granted by the U.S. Department of Education.

However, the denominator of the ratio – the value of the education received – is of intense interest to ACICS and the broader accreditation community. The program of quality review carried out by ACICS represents prominence and activism regarding the value of education delivered at member institutions. The discipline of peer review not only ensures that the college or school is meeting minimum standards of eligibility for participation in Federal Student aid programs; when it operates at its optimum, accreditation pushes institutions to pursue and attain excellence. Accreditation collects, scrutinizes and shares the best practices of high-performing institutions with other institutions, empowering the education enterprise to deliver greater value and quality, irrespective of prices charged.

ACICS's accreditation program places great emphasis on the discipline and practice of institutional effectiveness planning and management. The scope and robustness of the plans are subject to review by evaluators with administrative and institutional data expertise during the recurring accreditation cycle. Data regarding retention, placement and licensure exam pass rates are reported and reviewed on an annual basis by the Council to ensure institutional effectiveness is maintained or enhanced in between accreditation reviews. The aggregate data is disclosed through the ACICS website and published in the annual compendium of key operating statistics, so that the public, policy makers and students may review effectiveness on their own terms.

The outcomes of the ACICS accreditation review are not provided in comparative terms; the institution is either granted accreditation or it is denied. The value of the review for the student is knowledge that the quality for their investment has been assured by an independent, third-party organization with the expertise and authority to ascertain deficiencies and prescribe potent, immediate remedies. Enhancing the ability of accreditation to play that role is worthy of the Higher Education Act during Congressional reauthorization.

**In summary**, the reforms to accreditation accomplished through the reauthorization of the Higher Education Act should be based in part on a strong awareness of the students served by private, independent colleges and schools. The reforms must reflect an understanding of the existing strengths of the accreditation program as it is applied today to those institutions. And finally, the accreditation community is capable of playing

a broader role in defining and disclosing measures of value that are to be applied to the price/value proposition. The persistent, prominent presence of accreditation on college campuses, when coupled with the quality review process, represents a unique opportunity to advance and strengthen the balance between price and value.

ACICS acknowledges the daunting but important task Congress faces in strengthening accreditation through the reauthorization of the Higher Education Act. To the degree the effort emphasizes the quest for academic quality, reduction in regulatory complexity and avoidance of overreach by the federal government into matters that are primarily academic in nature, it will advance the cause of students currently enrolled, and those who enroll in coming semesters.

Thank You.