

**Testimony of Barbara Brittingham, President
New England Commission of Higher Education
to the House Committee on Education and Labor
Subcommittee on Higher Education and Workforce Investment**

**Strengthening Accountability in Higher Education to
Better Serve Students and Taxpayers
April 3, 2019
Washington D.C.**

Chairwoman Davis, Ranking Member Smucker, Members of the Committee, thank you for the opportunity to testify this morning on issues related to accreditation in our nation's higher education system.

I speak this morning from the perspective of serving as President of New England Commission of Higher Education (NECHE) for the past 11 years. NECHE is one of seven regional accreditation agencies in the nation. Our region covers six states and our Commission accredits over 200 institutions, which award nearly \$7 billion of federal financial aid every year. Because New England was settled early in our country's history and before any significant development of public higher education, compared with other regions we have more independent colleges and universities and fewer – currently only three – for-profit institutions. Our Commission is keenly aware of its responsibility to the public: to ensure taxpayer dollars are going to support students at institutions that provide them with a solid education and degrees that have value.

Taken together, regional accreditors serve as gatekeepers for federal financial aid to approximately 3,000 public, independent, and for-profit colleges and universities. These diverse institutions include research universities, state colleges, liberal arts colleges, faith-based institutions, medical schools, and institutions oriented toward business, arts, law, and health. Other institutional accreditors are known as National Accreditors, which combined, accredit roughly 1,200 institutions, about 500 faith-based and 4,300 career-related institutions, most of which are for-profit. In addition, the U.S. Department of Education (Department) recognizes 40 programmatic accreditors in areas such as medicine, nursing, law, and dance. All of the accreditors recognized by the Department serve as gatekeepers to federal financial aid for students or other federal funding.

For institutions to be eligible to participate in federal student aid programs they must be authorized by the States in which they operate. States ensure compliance with their own requirements particularly with respect to consumer protections. Institutions must also be approved by the Department, which focuses primarily on compliance with federal rules and regulations related to student aid. Finally, they must be accredited by an agency recognized by the Secretary of Education. As an accreditor, our role is to oversee and ensure the quality of education at each of the institutions we accredit. This framework is often referred to as the "triad."

Although we each have separate roles, we work with the federal government and individual states on a nearly daily basis. In addition, twice a year, we convene a meeting of state officials known as SHEEO's – State Higher Education Executive Officers – from across the region to increase broader communication and coordination. We also work with federal financial aid staff regarding institutional closure, program confirmation, and currently with respect to a request to accredit a state system of higher education. The Higher Learning Commission, the largest regional accreditor, is working with states on Coordinated Visits and Large-Scale Teach-Outs.

Before any institution becomes accredited, it must first be found eligible. The next step is to apply for candidacy, which involves a self-study showing how and how well the institution meets each of our nine standards which include those required under the Higher Education Act, including success with respect to student achievement, curricula, faculty, fiscal and administrative capacity among others.

The self-study is validated by a team of peer evaluators selected from a pool of roughly 1,800 volunteers and trained by our agency.

Within five years, the institution must repeat that process to become accredited. Overall, it takes new institutions six to seven years to become accredited, though, per the Higher Education Act, if they are non-profit, they can participate in federal financial aid when they become candidates. In New England, given the demographic decline of 18-year-olds, we have more institutions merging and closing than we have new institutions. We currently have two candidates, one offering a Master of Fine Arts degree in media arts, the other offering a bachelor's degree to students not otherwise well served, including individuals in and recently out of prison. Over the past few years, five institutions in New England have talked to us about becoming accredited but have decided either that it was not a good fit or that they were not yet ready.

Decisions regarding eligibility, candidacy, and accreditation are made by our Commission, a group of 27 individuals including institutional members (e.g., presidents, academic officers, finance officers, experts in distance education, trustees) and members of the public. By regulation, at least one of every 7 members must be from the public; we have had employers, lawyers, foundation heads, and finance experts as public members. The Commission also is responsible for the decisions about monitoring institutions and for the adoption of the standards which are regularly updated, taking into account input from member institutions, states, and interested others.

Our relationship with each institution does not end once they are accredited. Every institution has a comprehensive evaluation every ten years and a significant interim report at the mid-point. To monitor institutions between these points, the Commission has a variety of special reports and visits it employs to both assure the quality of the institution and assist in institutional improvement. We also have a process for public complaints and public comments about institutions.

Further, each year, we require every institution to submit a report which includes information on enrollment, finances, and student debt. Information from the report can help determine whether the institution requires additional monitoring on those topics or is planning a change that will

require Commission review and approval. Last year, for example, approximately 15 institutions were identified for additional monitoring through the annual report.

When the Commission has reason to believe that an institution is no longer meeting one of our nine standards (which are consistent with those standards required under HEA), it will ask the institution to show cause why it should not be placed on probation or have its accreditation withdrawn. If the institution is indeed found not to be in compliance with one or more standards, it will be placed on probation for no longer than two years if it has realistic plans to come into compliance. Absent those plans, the Commission will act to withdraw accreditation. These decisions can be appealed on procedural grounds. During that process, there is also a provision for new evidence, which, if found to be material and significant, can lead the Commission to reconsider its decision.

In times of economic and demographic stability, the show cause action for probation or withdrawal of accreditation may happen once or twice a year. This year, as touched by this process, four institutions are closing and one remains on probation.

While the Commission does when appropriate withdraw accreditation – and thus ending the institution’s ability to participate in student federal aid programs – our job is not to shut down every institution that encounters a problem. Our role is to monitor and assist institutions, ensure they are making any necessary changes in a timely fashion, which at the same time being prepared to withdraw accreditation if the institution can no longer provide a solid education to its students.

When an institution has its accreditation withdrawn or decides on its own to close, we work with them to make sure that they have signed teach-out agreements with other institutions so that students can continue their education with minimal disruption. The teach-out institutions agree to admit the students as transfer students, to provide a smooth path with respect to transfer credits, and in many cases to ensure that students pay no more at the teach-out institution as they did at their original institution. We also confirm that there will be permanent storage of student records. While never an ideal situation, I’m pleased that we have been largely very successful in helping with these transitions and I’m happy to speak at more length about specific examples where these teach-outs have occurred.

In every region, accreditation focuses on student outcomes. Our eighth standard is *Educational Effectiveness*. Here, institutions, teams, and the Commission look at retention and graduation rates, loan default and repayment rates, and whether students are achieving the learning goals of their programs. Licensure passage rates, going on to the higher degree, and employment rates are also important. Institutions also look at particular outcomes central to their mission. Public institutions often look at the percent of graduates who are employed in their state. An arts institution reports what percent of students make their living from their art. A research university looks at how many students are awarded national and international fellowships. A faith-based institution looks at the percent of its graduates who report attending church regularly. Our standard on *Integrity, Transparency, and Public Disclosure* includes the requirement for institutions to make available information that will help prospective students and their families decide if the institution is a good fit for the student’s aspirations.

As with K-12 education, there is no single measure of success, there is no bright line that can assure quality. In higher education, accreditation provides a process to identify, collect, and analyze a rich array of quantitative and qualitative data and put it into the framework of mission, student body, and local context. Our Commission uses a set of Data First forms that both require consistent information from all institutions and make provision for institution-specific metrics related to mission. WSCUC, WASC Senior College and University Commission, the regional accreditor for four-year institutions in California and Hawaii, has produced a Graduation Rate Dashboard, a measure of absolute creation rate and credit redemption to complement IPEDS; it incorporates trend and comparison information to help institutions understand outcomes in the context of their own past performance and of other institutions' results. ACCJC, the Accrediting Commission for Community and Junior Colleges, the regional accreditor for two-year institutions in California and Hawaii, asks institutions to report annual three-year trends in areas such as certificates and degrees awarded, transfer rates to four-year institutions, licensure passage rates, and employment rates for career/technical graduates. Institutions are asked to compare their aspirational goals with actual numbers and comment on significant findings.

With respect to the reauthorization of HEA, I, along with my regional colleagues, have been closely following Congressional efforts, including reviewing the separate proposals put forth by Democrats and Republicans last year.

In both of these bills, the PROSPER Act and the AIM Higher Act, there are provisions in both we find appropriate. In particular, we appreciate the provisions to maintain the centrality of peer review. The 30,000 volunteers who participate in accreditation each year provide a level of expertise and a reasonable cost structure that could not be duplicated in any other system.

We hope that under a re-authorized Higher Education Act, regional accreditation can continue to fulfill its dual responsibilities of quality assurance for the public and quality improvement for institutions.

We believe in allowing for more flexibility and innovation in the HEA so that institutions can focus on outcomes that matter most to their students, workforce partners, and communities. These are challenging times in higher education, and we hope that the re-authorization includes provision for accreditors to innovate and experiment to ensure it remains a robust and responsive member of the triad, dealing with issues and challenges that may not yet be before us.