New Approaches to Judging Quality in Higher Education

Profiles of Emerging Methods
Apart From Traditional Accreditation

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CHEA/CIQG Publication Series

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CHEA International Quality Group
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ABOUT CHEA

A national advocate and institutional voice for academic quality through accreditation, the Council for Higher Education Association (CHEA) is an association of 3,000 degree-granting colleges and universities and recognizes approximately 60 institutional and programmatic accrediting organizations in the United States. The CHEA International Quality Group (CIQG) serves as a U.S.-based international forum for quality assurance and accreditation.

ABOUT NORC

NORC at the University of Chicago is an objective, non-partisan research institution that delivers reliable data and rigorous analysis to guide critical programmatic, business, and policy decisions. Since 1941, NORC has conducted groundbreaking studies, created and applied innovative methods and tools, and advanced principles of scientific integrity and collaboration. NORC conducts research in five main areas: Economics, Markets, and the Workforce; Education, Training, and Learning; Global Development; Health and Well-Being; and Society, Media, and Public Affairs.

INTRODUCTION

The purpose of this report is to profile a selection of emerging approaches to judging quality in higher education that represent a range of stakeholder interests and perspectives. This report includes three sections:

Part 1. Quality Assurance at a Crossroads highlights perceived challenges for the U.S. accreditation system in a shifting higher education landscape and why this topic is of critical importance.

Part 2. New Models for Judging Quality in Higher Education features new approaches that have emerged as potential complements to or replacements for the existing system of accreditation. First we describe models that are currently in practice or that include detailed proposals for implementation, and then we summarize other noteworthy proposals under development.

Part 3. Comparative Data Sets and National Rankings as Forms of Quality Review addresses the potential for comparative data sets to serve as a form of quality review.

PART 1. QUALITY ASSURANCE AT A CROSSROADS

For at least the last 60 years, accrediting organizations were considered *the* reliable authorities for assuring quality in U.S. colleges and universities (Eaton, 2015; Harcleroad, 2011). Supporters of the current system consider the flexibility of the U.S. system of accreditation that allows institutions to set their own mission-driven goals and measures appropriately responsive to the diversity of institutions and programs that comprise it (Brown, Kurzweil, & Pritchett, 2017). Furthermore, supporters laud the nongovernmental structure of traditional accreditation and consider necessary the peer review processes that leverage relevant faculty and administrator expertise for assessing educational quality and fostering institutional improvement (Eaton, 2015; Government Accountability Office [GAO], 2018). However, some observers perceive these same characteristics as key limitations of a system built for a bygone era.

As U.S. higher education transforms from an elite to a mass system—expanding

opportunity to new types of students, delivering content in new ways, and matching the pace of rapidly changing labor markets with new programs—some question the relevance and nimbleness of traditional quality review approaches. Are the foundational values and beliefs of U.S. accreditation such as institutional autonomy, academic freedom, and decentralization compatible with demands for uniform standards and public accountability that come with increasing investments in higher education? Can a system built for traditional institutions and programs and carried out by academics and administrators from the same be expected to assure the quality of an increasing array of non-traditional education and training providers? Exhibit 1 summarizes other selected[1] higher education changes underway, a number of which traditional accreditation was not originally intended to address.

Exhibit 1. Major Changes Underway in Higher Education

Increasing diversity of learners	*New providers*	*New credentials*	*Retention and completion challenges*	*Increasing costs and debt*
Waning public trust	*Changing workforce demands*	*Inequitable outcomes*	*Concerns about value and return on investment*	*Proliferation of data*
New approaches (e.g., competency-based education)	*New finance models*	*Increasing scrutiny of accreditation decisions*	*Increasing concern for consumer protection*	*Potential conflicts of interest in traditional peer review*

Considering today's fast-evolving higher education context, experts note several specific aspects of accreditation that may be out of sync with these changes, including: (a) lack of attention to alternative providers; (b) conflicting roles and responsibilities for accreditors; (c) scope, definitions and measures of quality; and (d) lack of attention to public accountability and transparency (Ewell, 2015; GAO, 2018; Miller, Bergeron, & Martin, 2016). Each of these perceived challenges for accreditation is summarized briefly in the next section.

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[1] More extensive discussions of the many groundbreaking changes underway in higher education are available elsewhere. See, for example, American Council on Education (2012), Ewell (2015), and Horn and Kelly (2015).

Accreditation Challenge #1: Alternative Providers of Higher Education

Spurred by the multiyear economic slowdown of the last decade combined with rapid advances in technology, new and innovative education and career training models have emerged outside of traditional colleges and universities. These models, which range from intensive place-based programs like coding bootcamps to nanodegrees developed by leading massive open online courses (MOOCs) providers, have seen tremendous growth in recent years (Council for Higher Education Accreditation [CHEA], 2014; Horn & Kelly, 2015). For example, Class Central—a search engine and reviews site for MOOCs—reports that, as of 2017, an estimated 81 million students worldwide have enrolled in at least one of the more than 9,400 available MOOCs, as depicted in Exhibit 2 (Shah, 2017). Because many of these programs fall outside of the traditional system of accreditation, U.S. students wanting to access these programs face two key barriers: (a) unaccredited educational providers are ineligible to participate in federal financial aid programs, and (b) no formal external reviews of quality are currently required of them (U.S. Department of Education [USDE], 2016).

Exhibit 2. Major Changes Underway in Higher Education
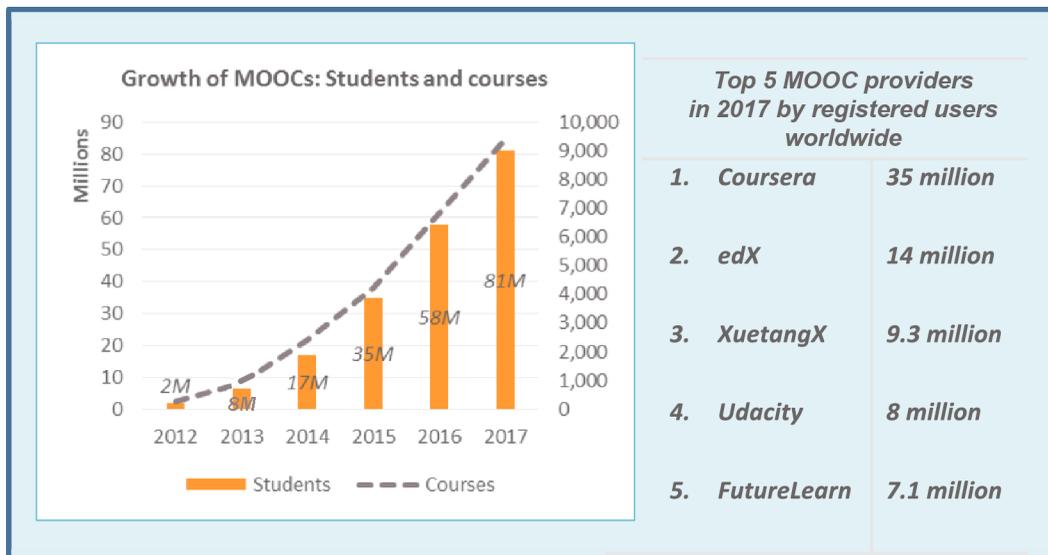
Note. Adapted from Shah (2013, 2014, 2016, 2016, 2017).

Accreditation Challenge #2: Conflicting Roles and Responsibilities for Accreditors

Several reports address the inherent tensions in the current roles and responsibilities of accreditors that may limit the effectiveness of their efforts to oversee quality in higher education (Cooper, 2016; GAO, 2018; Miller et al., 2016). Some researchers argue that the financial aid gatekeeping function that has come to define present-day conceptions of accreditation is in conflict with the self-regulation or quality improvement functions that originally characterized accreditation (Cooper, 2016; Ewell, 2008). Others criticize the accreditation "business model" for creating potential financial conflicts of interest because accreditors' main sources of revenue are dues and fees from the very institutions they oversee (GAO, 2018).

Accreditation Challenge #3: Scope, Definitions and Measures of Quality

Critics of accreditation argue that current quality review processes are too broad in scope and too focused on input criteria, such as facilities, faculty qualifications, and student support services, and not focused enough on critical outcomes like student learning, completion, and job placement (ACE, 2012; Kelly, James, & Columbus, 2015; Miller et al., 2016). Moreover, because U.S. accreditors are a diverse collection of independent organizations rather than a unified system of regulators, the existing structure is not designed to develop or promote "consensus standards" typical in other sectors. The resulting absence of common definitions and measures of quality is also the subject of growing criticism (GAO, 2018).

Accreditation Challenge #4: Public Accountability and Transparency

The U.S. accreditation system is increasingly called on to shift its central focus from quality improvement to public accountability, particularly given mounting costs of—and massive public and private investments in—higher education. However, the accreditation system was not originally created to directly serve the public interest and therefore may not be sufficiently transparent or helpful to students and other members of the public seeking practical information about academic quality (Eaton, 2011; Ewell, 2008; GAO, 2018). As noted in the previous section, this issue is further complicated by definitional and measurement differences across accrediting organizations.

These critical challenges place immense pressure on the current system of accreditation to reform or make room for new entrants who will provide new approaches

tailored to meet these challenges. The next section presents some of the emerging approaches to judging quality in higher education that are seeking to fill this void.

PART 2. NEW MODELS FOR JUDGING QUALITY IN HIGHER EDUCATION

In recent years, numerous task forces, forums, expert panels, think tanks, policy-makers, and higher education providers have attempted to address the perceived limitations of traditional accreditation by proposing ideas, introducing legislation and piloting new models for judging quality in higher education. This section of the report presents selected profiles of new approaches to quality review that reflect a diversity of perspectives and interests. First, we describe the key features of models that have been piloted in the field or that offer detailed proposals for implementation. Second, we review other proposals that are less well developed but still noteworthy.

Piloted Models and Detailed Proposals

For each of the following approaches, we begin by outlining the perceived challenge(s) for traditional accreditation that the approach aims to address, and then describe the approach in terms of five key features:

1. *Educational context* refers to the context(s) for which the quality assurance approach is proposed or currently carried out.

2. *Quality definitions* focuses on the particular definition(s) or measure(s) of quality the approach advocates.

3. *Who defines quality* describes the actors responsible for setting the standards by which quality is or should be assessed.

4. *Who assesses quality* describes the actors responsible for determining compliance with the standards.

5. *Role of money* addresses whether and how money factors into the approach.

EQUIP Quality Assurance Entities (QAEs)

Introduced in 2015, the U.S. Department of Education's (USDE) Educational Quality through Innovative Partnerships (EQUIP) experiment is intended to encourage increased innovation in higher education through partnerships between Title IV-eligible colleges and universities and Title IV-ineligible nontraditional education and training providers. EQUIP tests new ways of promoting access to innovative education and training opportunities that fall outside the current financial aid system. This program allows institutions to award federal financial aid to eligible students enrolled in selected programs for which 50 percent or more of the content and instruction is provided by nontraditional providers (USDE, 2016). EQUIP aims to advance quality assurance processes that focus on student learning and other outcomes through the use of independent Quality Assurance Entities (QAEs) (USDE 2015). The third-party QAEs establish and carry out rigorous quality assurance processes—establishing standards and reviewing, monitoring and reporting on programs and providers according to USDE's guidance. Exhibit 3 details the key features of the EQUIP QAEs. Exhibit 4 summarizes the eight original EQUIP pilot partnerships selected in 2016 and their current status. Of note, only five partnerships remain in the pilot as of 2018 (McKenzie, 2018).

Exhibit 3. Key Features of EQUIP Quality Assurance Entities*

Quality Assurance Entities (USDE)

Accreditation Challenges Explicitly Addressed

✓ Alternative Providers of Higher Education
✓ Conflicting Roles and Responsibilities for Accreditors

✓ Scope, Definitions and Measures of Quality

Educational Context — EQUIP partnerships pair Institutions of Higher Education and alternative education providers.

- EQUIP is focused on low-cost, short-term programs and low-income students.
- Nontraditional partners include coding bootcamps, online course providers and employer organizations.

Quality Definitions — Definitions and measures focus on outcomes.

- Outcomes relate to the USDE guiding questions and address (a) claims for learning, (b) assessment and student work, (c) outputs and (d) program management.

Who Defines Quality — QAEs set quality standards specific to their EQUIP partnership.

- QAE-defined standards must be consistent with the USDE guiding questions.
- QAEs also establish quality assurance processes for reviewing their programs and providers.

Who Assesses Quality — QAEs carry out quality reviews and monitor programs and providers.

- QAEs monitor programs at regular intervals reflecting their program's student enrollment trajectories.
- QAEs report findings to institutions, accreditors and USDE every six months or when a concern arises.

Role of Money — Students access federal student aid to enroll in approved programs.

- Accredited colleges and universities receive waivers from USDE that allow them to award federal financial aid to students enrolled in programs primarily offered through the unaccredited partner provider.

*USDE=U.S. Department of Education, EQUIP=Educational Quality through Innovative Partnerships, IHE=Institution of Higher Education, QAE=Quality Assurance Entity.

Exhibit 4. Selected EQUIP Sites and 2018 Status*

Institution: Colorado State University Global Campus (Greenwood Village, CO)

Nontraditional provider: Guild Education

QAE: Tyton Partners

Status: Withdrawn/On Hold

Institution: Marylhurst University (Marylhurst, OR)

Nontraditional provider: Epicodus

QAE: Climb

Status: Pending Approval

Institution: SUNY Empire State College (Saratoga Springs, NY)

Nontraditional provider: The Flatiron School

QAE: American National Standards Institute

Status: Pending Approval

Institution: University of Texas-Austin (Austin, TX)

Nontraditional provider: MakerSquare

QAE: Entangled Solutions and Moody, Famiglietti & Andronico, LLP

Status: Withdrawn/On Hold

Institution: Dallas Community College System (Dallas, TX)

Nontraditional provider: StraighterLine

QAE: CHEA Quality Platform

Status: Approved

Institution: Northeastern University (Boston, MA)

Nontraditional provider: General Electric

QAE: American Council on Education

Status: Pending Approval

Institution: Thomas Edison State University (Trenton, NJ)

Nontraditional provider: Study.com

QAE: Quality Matters

Status: Pending Approval

Institution: Wilmington University (New Castle, DE)

Nontraditional provider: Zip Code Wilmington

QAE: HackerRank

Status: Withdrawn/On Hold

*CHEA = Council for Higher Education Accreditation, EQUIP = Educational Quality through Innovative Partnerships, QAE = Quality Assurance Entity. Adapted from U.S. Department of Education (2016) and McKenzie (2018).

CHEA Quality Platform

The Council for Higher Education Accreditation's (CHEA) Quality Platform is intended to address the growth of alternative providers of higher education. The Quality Platform establishes outcomes-based standards for conducting voluntary external quality reviews of alternative providers with a core focus on student achievement. Quality Platform standards are suitable for use in the United States and internationally and reviews can be carried out by a range of entities, including existing accreditation or quality assurance bodies, higher education associations and other organizations created expressly to conduct such a review. CHEA piloted the Quality Platform with the DeTao Masters Academy Advanced Classes, a private company in China offering nontraditional education programs. In addition, CHEA currently employs the approach in its role as a QAE for an EQUIP partnership between the Dallas County Community College District and StraighterLine, a U.S. company that offers low-cost, online higher education courses (CHEA, 2016). Of the original eight pilot projects selected to participate in the EQUIP program, this partnership is the first to receive final approval from the Department of Education (McKenzie, 2018). Exhibit 5 details the key features of the CHEA Quality Platform.

Exhibit 5. Key Features of the CHEA Quality Platform

The Quality Platform (CHEA)

Accreditation Challenges Explicitly Addressed

- ✓ Alternative Providers of Higher Education
- ✓ Scope, Definitions, and Measures of Quality
- ✓ Public Accountability and Transparency

Educational Context	This approach is tailored to alternative providers of higher education.

- This approach is intended for a range of program types, including short-term courses, certificate- and badge-granting experiences, noncredit online career develpment modules, etc.

Quality Definitions	Definitions and measures focus on outcomes.

- The primary focus is student achievement (i.e., what students learn and can do).
- A secondary focus in defining quality is providers' capacity and resources, especially technology.

Who Defines Quality	Providers define quality within the Quality Platform outcomes framework.

- The Quality Platform also relies on research and analysis, pilot testing, and consultation with the quality assurance, higher education, and employer communities in administering its approach.

Who Assesses Quality	This approach includes self-review and external review.

- Quality assurance bodies, higher education associations, and other third parties carry out voluntary external reviews roughly every three years. These reviews include a transparency requirement.

Role of Money	Providers pay a fee for the Quality Platform review.

- Successful reviews result in the designation "Quality Platform Provider." Review findings provide students and the public with reliable information about provider performance that can inform their investment decisions.

Center for American Progress Alternative Gatekeeping System

The Center for American Progress's (CAP's) detailed proposal for an Alternative Gatekeeping System for granting access to federal financial aid is intended to foster innovation while protecting higher education consumers (Miller et al., 2016). CAP recommends its Alternative Gatekeeping System as a "complementary competitor" to the existing system of accreditation that addresses limitations related to conflicting roles and responsibilities, alternative providers, and scope and measures (Miller et al., 2016, p.1). Similar to other new approaches to judging

quality, the Alternative Gatekeeping System proposes using private third parties (including existing accrediting organizations and new actors such as professional and academic membership organizations) to set outcomes-based quality standards and measures, with a specific focus on student outcomes and provider financial health. Third parties would also set minimum thresholds for their proposed outcome measures that may vary based on provider or program type. Under this model, the federal government would select and review third-party standard-setters, collect and verify provider data, and enforce penalties in case of noncompliance with standards (Miller et al, 2016). Exhibit 6 details the key features of the Alternative Gatekeeping System proposal.

Exhibit 6. Key Features of the Alternative Gatekeeping System Proposal*

Alternative Gatekeeping System (CAP)

Accreditation Challenges Explicitly Addressed

- ✓ Alternative Providers of Higher Education
- ✓ Conflicting Roles and Responsibilities
- ✓ Scope, Definitions and Measures of Quality
- ✓ Public Accountability and Transparency

Educational Context — The system is suitable for any provider or program but has not been piloted.

- The system is designed for educational providers and programs that want to participate in U.S. federal student financial aid programs.

Quality Definitions — Definitions and measures would focus on outcomes.

- Student outcomes include completion, job placement, earnings of graduates and federal loan repayment.
- Outcomes also address provider financial stability (e.g., ratios of assets to liabilities and debts to assets.

Who Defines Quality — Private third parties would set quality standards, measures and thresholds.

- USDE would select and review standard-setters and approve and monitor the effectiveness of standards.
- New actors other than traditional institutional accreditors could be standard-setters.

Who Assesses Quality — USDE would assess providers' performance against quality standards.

- USDE would collect and verify relevant performance data directly from providers.
- USDE would enforce standards and determine providers' financial aid eligibility.

Role of Money — Students in approved programs could access federal student financial aid.

- USDE would publicly release all decisions and related justifications for approval or termination of a provider's participation in federal financial aid program.

* CAP = Center for American Progress, USDE = U.S. Department of Education.

Entangled Solutions Quality Assurance (QA) Standards

Entangled Solutions, a company that focuses on innovation in higher education, is one of the QAEs selected to monitor student outcomes in an EQUIP partnership—though this partnership is currently on hold as shown previously in Exhibit 4. Entangled Solutions recently released its Quality Assurance (QA) Standards with a goal of creating unified standards for audited outcomes reporting. The QA Standards were developed with the help of a 25-member task force representing traditional academic institutions, coding bootcamps, professional services and investment firms, and policymakers. Entangled Solutions emphasizes transparency and accountability and recommends its approach as an alternative to traditional accreditation that is suitable for traditional and alternative providers of higher education (Entangled Solutions, 2018). Exhibit 7 details the key features of Entangled Solutions' Quality Assurance Standards.

Exhibit 7. Key Features of Entangles Solutions' Quality Assurance Standards

Quality Assurance Standards (Entangled Solutions)

Accreditation Challenges Explicitly Addressed

- ✓ Alternative Providers of Higher Education
- ✓ Conflicting Roles and Responsibilities
- ✓ Scope Definitions and Measures of Quality
- ✓ Public Accountability and Transparency

Educational Context — The approach is suitable for traditional and alternative providers.

- Entangled Solutions originally designed the Quality Assurance (QA) Standards for alternative providers, like coding bootcamps and online course providers, but now promotes the approach for any provider type.

Quality Definitions — Definitions and measures focus on outcomes.

- QA Standards relate to learning, completion, satisfaction, job placement and earnings.
- Measures selected must support a provider's claims about its program outcomes and student success.

Who Defines Quality — Entangled Solutions and 25-member task force set initial standards.

- Entangled Solutions will set up a nonprofit organization to maintain the QA Standards and support the auditing process.

Who Assesses Quality — Third-party auditors carry out external quality review.

- Independent auditors monitor compliance with QA Standards, but students, employers and funders make final judgements of quality based on publicly available audit findings.

Role of Money — The approach is designed to help students determine where to invest.

- The third-party auditor will have no financial relationship to the provider being reviewed.

QA Commons Essential Employability Qualities Certification (EEQ CERT)

The Quality Assurance Commons for Higher and Postsecondary Education (QA Commons) is a project of the National Center for Higher Education Management Systems funded by a grant from Lumina Foundation. The mission of the QA Commons is to develop and test alternative approaches to quality assurance that are responsive to the changing higher education landscape (QA Commons, 2018a). The core focus of the QA Commons is assuring students, families and employers that higher education programs prepare students for employment and success. The Essential Employability Qualities Certification (EEQ CERT) is QA Commons' program-level approach to certifying baccalaureate and sub-baccalaureate programs through an employer-recognized quality review process (QA Commons, 2018b). Although many of the essential employability qualities that make up the EEQ CERT build on existing learning and outcomes frameworks (including Lumina Foundation's Degree Qualifications Profile and the Association of American Colleges & Universities' Essential Learning Outcomes), the main emphasis of the EEQ CERT is employment-related outcomes. Twenty-seven higher education programs at 14 institutions are currently participating in a pilot to field test the approach's proposed criteria (QA Commons, 2018c). Exhibit 8 details the key features of the EEQ CERT.

Exhibit 8. Key Features of the EEQ CERT*

EEQ CERT (QA Commons)

Accreditation Challenges Explicitly Addressed

✓ Scope, Definitions, and Measures of Quality   ✓ Public Accountability and Transparency

Educational Context   The approach currently focuses on traditional providers of higher education.

- The current pilot includes 27 baccalaureate and sub-baccalaureate programs in a variety of disciplines within a variety of institution types. In all, 14 institutions are participating in the pilot.

Quality Definitions   Criteria for EEQ certification focus on workforce readiness outcomes.

- Program certification is based on students' knowledge, skills, abilities and experiences for employability.
- Outcomes also focus on soft skills (e.g., communication, problem-solving, collaboration adaptability, etc.)

Who Defines Quality   Academic experts in partnership with students and employers define criteria.

- Pilot programs serve as "co-designers" of the EEQ CERT approach.
- Employer representatives play a central role through two QA Commons advisory bodies.

Who Assesses Quality   Academic experts, students and employers play a role in quality review.

- EEQ certification will be awarded based on outcomes-based verifiable evidence.
- The EEQ pilot will determine the best way to validate and evaluate data provided by programs.

Role of Money   To be determined.

- The EEQ pilot seeks to determine how to align the EEQ certification approach with other quality assurance processes.

*EEQ CERT=Essential Employability Qualities Certification, QA Commons=Quality Assurance Commons for Higher and Postsecondary Education

Council on Integrity in Results Reporting (CIRR) Standards

Coding schools or coding bootcamps are an important example of alternative providers of higher education that have gained attention in recent years. Although these short-term intensive training programs are promoted as pathways to high-paying programming jobs in the digital economy, recent closings and growing complaints in the coding bootcamp industry have led to calls for uniform quality assurance standards and processes for these providers (Lohr, 2017; McBride, 2016). The Council for Integrity in Results Reporting (CIRR) is a nonprofit code school membership organization that began as a project of Skills Fund, an organization that offers financing to code school students. CIRR defines and maintains quality standards, requires members to annually assess and publicly release student outcomes reports; and requires members to obtain annual, third-party verification of their documentation and reporting (CIRR, 2018). Twenty members currently employ CIRR standards, with many schools producing CIRR reports for multiple sites (CIRR, 2018). Exhibit 9 charts the growth of coding bootcamps in the United States and Canada since 2013 as well as CIRR member locations. Exhibit 10 details the key features of the CIRR approach.

Exhibit 9. Growth of U.S. and Canadian Coding Bootcamps and CIRR Members*
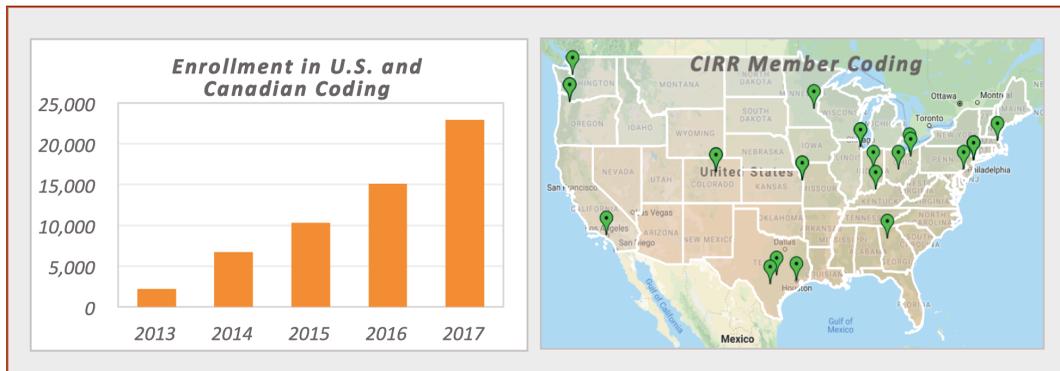
*Adapted from Course Report (2017) and CIRR (2018).

Exhibit 10. Key Features of the Council on Integrity in Results Reporting

Council on Integrity in Results Reporting (CIRR) Standards

Accreditation Challenges Explicitly Addressed

✓ Alternative Providers of Higher Education
✓ Scope, Definitions, and Measures of Quality

✓ Public Accountability and Transparency

Educational Context	The approach is designed for alternative providers of higher education.

- The approch is specifically targeted at code schools and/or coding bootcamps and is currently used by 20 schools, many of which have multiple sites.

Quality Definitions	Definitions and measures focus on outcomes.

- Definitions, measures, and reporting primarily focus on graduation and job placement outcomes (e.g., on-time graduation, full-time and part-time job placement, in- and out-of-field job placement, and salary).

Who Decides Quality	CIRR members set standards.

- Standards are intended to be transparent, easy to understand, and "student-first," reflecting what prospective students want to know about the coding schools' outcomes before deciding to enroll.

Who Assesses Quality	Students and other stakeholders ultimately judge quality.

- Member institutions generate their own CIRR standard report and obtain annual third-party verfication.
- Verified reports must be publicly available for students and others to use to make quality judgments.

Role of Money	The approach aims to provide information to influence investment decisions.

- Skills Fund, an alternative financing platform for students in coding bootcamps, uses CIRR standards to evaluate schools they work with.

Other Noteworthy Proposals Addressing Quality Review

This section provides brief descriptions of noteworthy proposals for alternative quality review approaches that are under development. These approaches include the U.S. Chamber of Commerce Foundation's employer-led approach and several legislative proposals.

U.S. Chamber of Commerce Foundation Employer-Led Quality Review

The U.S. Chamber of Commerce Foundation (2016) proposed two approaches for incorporating employers into processes for assuring quality in higher education intended to address the skills gaps of recent college graduates entering America's businesses. The first approach calls for strengthening the employer voice in current accreditation structures to improve institutional responsiveness to employer needs (U.S. Chamber of Commerce Foundation, 2016). The second approach calls for an employer-led quality review system based on leading practices from supply chain management. This approach may allow institutions to become recognized as preferred human capital suppliers for employers.

Higher Education Innovation Act (S.615, 2017)

This bill was first introduced by Senators Michael Bennet (D-CO) and Marco Rubio (R-FL) in 2015 and seeks to amend Title IV of the Higher Education Act of 1965 to create an alternative outcomes-based process for allowing students to use federal financial aid to access high-quality, innovative and effective programs offered by colleges, universities and alternative higher education providers. The bill calls for the development of a five-year pilot program in which providers would be required to produce data demonstrating successful student outcomes. The bill also calls for "innovation authorizers," designated by USDE, to define appropriate outcomes and measures and to authorize eligible entities to provide instruction and Title IV funds to students (S.615, 2017, p.2).

Higher Education Reform and Opportunity Act (S.2228, 2017)

This bill was introduced by Senator Mike Lee (R-UT) in 2017 and would allow states to create an alternative accreditation process for designating colleges, universities, nonprofit organizations, for-profit organizations or businesses and postsecondary apprenticeship programs as eligible for Title IV funding. It also allows states to administer federal financial aid for institutions and requires increased transparency about financial aid, alumni employment and federal loan default rates (S.2228, 2017).

Accreditation Reform and Enhanced Accountability Act (S.3380, 2016)

This bill was introduced by Senators Elizabeth Warren (D-MA), Brian Schatz (D-HI)

and Dick Durbin (D-IL) and calls for the U.S. Secretary of Education to establish criteria for accrediting agencies and associations to use for judging quality, including student achievement measures and federal loan repayment and default rates. This proposal would ban administrative officers and others with a financial interest in an institution from serving on the board or commission of that institution's accreditor (S.3380, 2016). It would also provide for differentiated accreditation status such as "accredited with distinction" or "with risk." This legislation creates penalties for accrediting agencies that fail to appropriately vet institutions found to have harmed students or engaged in abusive or deceptive practices.

PART 3. COMPARATIVE DATA SETS AND NATIONAL RANKINGS AS FORMS OF QUALITY REVIEW

The previous section presented a diverse selection of approaches to quality review. Some approaches wrestled with quality assurance challenges for alternative providers of higher education, others aimed to improve transparency and public accountability in the quality review process, and nearly all approaches stressed the use of standardized definitions and measures of quality, as well as the use of student outcomes rather than institutional and program-level inputs. Nearly all profiled approaches involved a third party to provide oversight or verification, or to carry out the quality review process. This last section features another potential type of quality review: comparative data. While the resources featured in this section were created as tools for reviewing institutional data and comparing colleges and universities across the United States and not as quality review tools, there is some debate if they also can potentially be used as a form of quality review.

The College Scorecard

The College Scorecard (2015) provides students, families, guidance counselors, nonprofits and other key stakeholders with institutional data through an online tool that has been accessed by over 2.5 million users (Kreighbaum, 2017). Users can easily find the average annual cost of an institution, its graduation rate, the typical salary post-graduation, and information on student debt levels.

This tool has some key strengths including data transparency and the ability to compare institutions, but it also has several key limitations that would need to be addressed in order to maximize its use as a quality review tool.

- The tool currently lacks data on student learning and preparing students to be active and engaged citizens.

- Graduation rate data are included, but graduation rate data for part-time and transfer students (first released in 2017) are not included.

- Median earnings data are included but are not disaggregated by major or adjusted to account for the cost of living where graduates live, and only covers federal financial aid recipients, which in some cases is a small subset of an institution's overall student population (Council of Economic Advisers, 2017; Williams, 2018).

Despite these limitations, the College Scorecard may be of some use in quality reviews, specifically for determining the average annual cost of an institution, its graduation rate, the typical salary post-graduation, and information on student debt levels.

Accreditor Dashboards

Building off the College Scorecard, which sought to increase transparency, enhance accountability and promote increased understanding of student outcomes of institutions that are approved by accrediting agencies, the Obama administration released the Accreditor Dashboards in 2016. The dashboards use data from the College Scorecard and are intended to help inform the National Advisory Committee on Institutional Quality and Integrity (NACIQI), which "provides recommendations regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes" (USDE, 2018, p.1). The dashboards include data visualizations that demonstrate the performance of the schools associated with the different accrediting agencies (USDE, 2018). The different dashboards are separated by accreditor and display data on "institutional characteristics, cost and debt levels, and completion rates and post-college outcomes—including typical earnings and repayment outcomes—of all the colleges and universities they accredit" (USDE, 2018, p.1).

The Accreditor Dashboards contain data in four key areas:

1. The performance and outcomes of the institutions the agency accredits

2. The evidence and data used in decision-making by the accrediting agency

3. The accrediting agency's standards and practices for assessing student achievement

4. The accrediting agency's activities aimed at improving program or institutional quality

In order to inform NACIQI's review process and to promote data transparency, ED created the accreditor dashboards. The data collected through this partnership are also data that could inform the arbiters of quality.

Ranking Systems

Collegiate ranking guides predate the College Scorecard and the Accreditor Dashboards, and are an influential, multimillion dollar industry (McDonough, Antonio, Walpole, & Pérez, 1998). Institutional administrators pay close attention to popular ranking guides, including those from the *U.S. News and World Report (USNWR)* and the *Princeton Review*, because fluctuation in these rankings affects enrollment, alumni giving, student and faculty morale, and campus resources (Meredith, 2004). Despite the popularity of rankings like *USNWR* or the *Princeton Review*, though, the majority of incoming freshmen do not use them (McDonough et al., 1998). Students using these guides account for 40 percent of incoming freshman and tend to have a higher socioeconomic status (McDonough et al., 1998). The Education Trust (2010), found even more staggering figures: Dependent students from families making less than $30,000 per year only account for 20 percent of college students using these guides (only 13 percent at "public research extensive universities") (p. 2). It is believed that the majority are not using these ranking guides because the information being ranked is not particularly useful to the rest of the college-going population (McDonough et al., 1998). While ranking systems garner lots of excitement among the popular press and are used by many individuals exploring colleges and universities, more transparent tools for making institutional comparisons have emerged over the years (e.g., College Scorecard, Accreditor Dashboards) to potentially provide a more complete review of available data.

CONCLUSIONS

The rapidly changing landscape of higher education is challenging the fundamental role, structure and scope of traditional, accreditation-based approaches to judging quality in higher education. The emerging approaches to quality assurance and review presented in this report offer new ways of defining and measuring quality, providing public accountability and transparency, addressing alternative providers of higher education, and identifying a mix-match in expectations of the roles and responsibilities of accreditors. Ultimately, students and the public need reliable ways of comparing and contrasting providers so they can choose high-quality programs that are appropriate to their academic and occupational goals. The piloted and proposed approaches reviewed in this report take on this challenge in different ways.

The models reviewed in this report focus on a wide array of quality outcomes, including student achievement, persistence, earnings, job placement, loan repayment, satisfaction, employability skills, and abilities. Many of the new definitions of quality represent a shift away from process evaluation and towards a focus on outcomes, diminishing much of the improvement function of traditional accreditation. These approaches are offered as complements, competitors, and in some cases replacements for the current array of national, regional and programmatic accrediting bodies and processes. The approaches also introduce new standard-setting and compliance roles for the federal government, the public, new third parties and state governments. The expanded roles for state and federal governments in some of these proposals may provide new opportunities for comparison across sectors normally accredited by different bodies, although government funding for these expanded roles may be a challenge.

The deference and autonomy once granted to accrediting organizations to decide the value and fate of providers of higher education are waning in the face of the challenges posed by the needs of new types of students and innovative business and content delivery models. The existing system of accreditation will remain under pressure to reform and adapt to the evolving needs of students and providers. And adaptability will ensure accreditation continues to play its critical role in helping the public and students identify and invest in quality institutions and programs, as well as maintain a healthy and effective system of higher education in the United States. While alternative approaches to quality review like those detailed here can provide insights and avenues for supporting our evolving system and its stakeholders, we need to know more about how their implementation supports the quality and transparency goals of quality assurance in the current higher education landscape.

Learning from these innovations can create a postsecondary education system with new models of delivery and types of providers while still providing high-quality outcomes, transparency, and accountability to students, parents, policymakers, employers, the general public and other key stakeholders.❖

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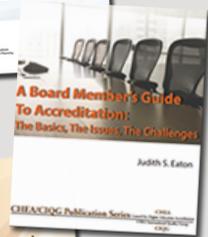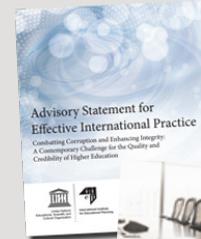
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