
Council of

Regional Accrediting Commissions

March 28, 2024

Dear Negotiators,

This note follows the recent round of negotiated rulemaking in which institutional accreditors appreciated the opportunity to work alongside you. C-RAC, the Council of Regional Accrediting Commissions, writes now to reinforce key points made there, especially about student achievement.

Let us be crystal clear: Today's institutional accreditors value and actively rely on student achievement outcome metrics in evaluating whether institutions meet their standards for effectiveness. Our agencies and our institutions use outcome data and monitor student achievement performance systematically and with consequences.

C-RAC agencies track disaggregated outcomes -- annually and through each review cycle -- to identify results that require follow up or even sanction. For example, ACCJC, NWCCU, and WSCUC produce public dashboards that track student achievement and trends on multiple measures against peer institutions. ACCJC also requires institutions to set stretch goals for student achievement. MSCHE's annual review of institutional data in 2023 has resulted in 81 reports required from schools that fell below established indicators and metrics for student achievement. SACSCOC requires benchmarking and monitoring on graduation rates and instructed half its institutions to provide additional information or take corrective action to improve.

And agencies are doing more as models become more sophisticated and data is more accurate and complete. SACSCOC is developing a ten-factor post-matriculation financial outcomes report with comparisons to peer institutions, while WSCUC recently added student postgraduate debt-to-earnings and return on investment data to its dashboard. HLC added a multi-phase focus on outcomes to its existing data collection for institutional reviews, as well as a new risk-management dimension including additional metrics for sustainability and success.

Accreditors expressed, along with the Department of Education and other negotiators, their shared commitment to the central goals of advancing student success, underscoring the value of student achievement measures in accreditation decisions, promoting student consumer protections, and assuring institutional and accreditor accountability. Institutional negotiators confirmed that student outcomes are a significant and increasingly demanding part of their evaluations. Recent NACIQI reviews of agency compliance with federal recognition criteria, as well as the NACIQI Dashboard Subcommittee Report, make clear that student outcomes are regularly included by agencies in determining whether institutions meet their standards.

In that spirit, C-RAC agencies support the revisions proposed by ED to the key sections on student achievement measures and monitoring of results. The proposals reflect respect for agency judgment and institutional mission in determinations about the nature and feasibility of measures, data quality, and monitoring decisions.


No single metric standing alone can tell whether a school is good or effective or meets a solid quality standard. Accreditors use multiple measures, evaluate trends over time, and leverage peer comparisons. This approach serves student achievement well because it can account for varied considerations that matter to students – graduation, affordability, career returns, transferability, and so on - and diminishes the risk of distortion from over-reliance on an isolated measure.

The interchange during regulatory negotiation reflected sincere concerns that led to improved student achievement language in the Department’s revisions at the last moment. Unfortunately, negotiators simply did not have time to process all the changes when the buzzer sounded. Unlike basketball, however, that’s not the end, as formulation of future rules continues. While the student achievement and enforcement sections deserve fine tuning, institutional accreditors voted against the last ED revisions primarily on two other issues – limitations on an agency’s board membership, and an overbroad and unexplained expansion of required visits to additional and branch locations that would increase costs for institutions without a return on investment and could negatively affect healthy innovation.

Accreditors have been collaborating with ED to identify the kind of data that promotes analysis and benchmarking contemplated by these regulatory proposals. Improving the scope and timeliness of data on student outcomes remains critical. We remain eager to work with ED toward data that is more comprehensive, available faster, and goes beyond graduation rates to incorporate other elements of student success.

Aligned with the expectations of ED and the public at large, C-RAC members are committed to promoting student success at our member institutions by using data-informed approaches to ensure educational quality, accountability, and outcomes.

Sincerely,



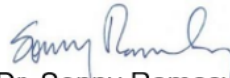
Jamienne S. Studley
C-RAC Chair
President, WASC Senior College and
University Commission (WSCUC)



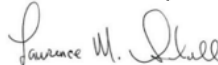
Dr. Heather Perfetti
C-RAC Vice Chair
President, Middle States Commission on
Higher Education (MSCHE)



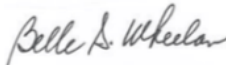
Dr. Barbara Gellman-Danley, President
Higher Learning Commission (HLC)



Dr. Sonny Ramaswamy, President
Northwest Commission on Colleges and
Universities (NWCCU)



Dr. Lawrence M. Schall, President
New England Commission of Higher Education
(NECHE)



Dr. Belle Wheelan, President
Southern Association of Colleges and Schools
Commission on Colleges (SACSCOC)



Dr. Mac Powell, President
Accrediting Commission for Community and
Junior Colleges (ACCJC)