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Improving How Accreditors Measure Student Achievement in Negotiated Rulemaking

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Accreditation is meant to provide students and taxpayers with a level of quality assurance for higher education—signaling that a college provides a valuable education to students and that schools can be trusted to use taxpayer dollars responsibly. In reality, accreditors often fail to hold institutions accountable for poor student outcomes, and weak regulations enable institutions that consistently fail their students to remain accredited and receive federal funding. To improve how student achievement is measured in accreditation, the Department of Education (Department) should prioritize establishing common definitions for student achievement and requiring accreditors to use responsible data practices in its upcoming negotiated rulemaking.

Establish Common Definitions for Student Achievement

There is little consistency in how accreditors assess an institution’s student achievement, in part because there are no established definitions for what constitutes a measure of student success. Accrediting agencies have complete leeway in how they define student outcome metrics like graduation rates—and whether they set benchmarks for those metrics at all. Some even give their seal of approval to schools that graduate fewer than 5% of the students they enroll.¹ So while accreditors should be holding institutions accountable for a level of quality, including good student outcomes, they are often not defining those outcomes in a consistent way or setting a clear baseline. The lack of common definitions also makes it impossible to compare student outcomes across accrediting agencies because they are not measuring the same metrics for the schools in their portfolios. Without established definitions for achievement that are applied consistently across accreditors, agencies will continue to pass schools that fail most of their students.

Through negotiated rulemaking, the Department should propose the establishment of common definitions for student success metrics. Common definitions would be a step toward greater higher education accountability by promoting consistent student outcomes reporting across accreditors, clarifying for institutions what is considered a successful outcome, and reducing the risk of accreditors approving consistently underperforming institutions. The Department is well-positioned to make these changes because it already knows how each accreditor currently defines student achievement as recorded in the Department’s 2017 report on accreditors’ student achievement standards.

Improve Data Quality and Usage Practices

Common definitions for student achievement would also open the door for the Department to improve required data collection from accreditors. There are currently no regulations or guidance for how accreditors collect and use student outcomes data reported by

institutions. In its updated regulations, the Department should require that accreditors adhere to three practices to improve student achievement data: use reliable data, establish baseline standards for student success, and disaggregate data whenever possible. By specifying that accreditors should follow these practices, the Department can ensure that agencies assess and report outcomes responsibly.

First, accreditors should be required to use reliable data from federal, public sources like the College Scorecard and the Integrated Postsecondary Education Data System (IPEDS) to measure student success. Currently, institutions can self-report data and use unreliable sources like opt-in student surveys to measure student success, which are vulnerable to response and reporting biases. Second, the Department should require that agencies work with the institutions that they accredit to craft self-determined target levels for student outcomes. Accreditors can then hold institutions accountable to meeting their targets as part of their mandate to maintain access to federal funds. Third, accreditors should require institutions to disaggregate their student outcomes data wherever possible. Separating data by student demographics—including characteristics like family income, race and ethnicity, and age—will enable accreditors to hold institutions accountable for supporting the success of all students.

Together, these data practices would better equip the Department with trustworthy data to hold accreditors and institutions accountable for a basic level of quality assurance and student success. Once the Department establishes common definitions for achievement, accreditors and institutions can be required to report data tailored to those definitions. This means data used in the accreditation process will tell a better picture of student success at each institution, rather than relying on biased, self-reported metrics that lack a basic bottom line to protect students and taxpayers from being left worse off. And because all accreditors would be responsible for utilizing these practices, there would be greater consistency in data collection and assessment across agencies. The Department would then be able to effectively compare student success data across institutions and accreditors, identifying those that are falling below target or failing to meet the baseline levels of quality we should be able to expect from a taxpayer-funded institution.

Together, common definitions and responsible data use practices for student achievement metrics can help accreditation deliver on its goal—ensuring that institutions serve their students well and are good stewards of taxpayer dollars. The current lack of guidance around student achievement definitions and student outcomes data lets underperforming institutions slip through the cracks and still gain an accreditor's seal of approval. The Department can act to boost higher education accountability in the upcoming negotiated rulemaking table by proposing common definitions for achievement measures and improving data use practices for accreditors. These recommendations could spur

accreditors to hold schools accountable for student success metrics and help the Department ensure that accreditors uphold common-sense standards of quality. That would be a win for students and taxpayers alike.

ENDNOTES



1. National Advisory Committee on Institutional Quality and Integrity. “Institutional AccredData.” US Department of Education, Aug. 2023, <https://sites.ed.gov/naciqi/>. Accessed 21 Nov. 2023.