

**Remarks to the Open Meeting of the
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At the beginning of the 2nd decade of the new millennium, ACICS would like to offer to the Committee some genuine considerations for enhancing the decades-long relationship between the Department of Education and the Accrediting Council for Independent Colleges and Schools (ACICS). These are considerations that serve the interests of regulators, legislators, taxpayers and most importantly, students seeking to advance themselves through post-secondary education. They deserve serious and thoughtful consideration by this distinguished panel as it reviews and develops recommendations for the Secretary regarding the structure, strength and appropriateness of the U.S. system of voluntary, peer accreditation commensurate with the reauthorization of the Higher Education Act.

The considerations are offered in the context of one specific type of accreditation for a specific category of institutions: that of career colleges, loosely defined as institutions whose mission is to provide education and training for specific professional, occupational and technical fields. Over the last few decades, the participation by Americans in this type of education has grown substantially, by some estimates as much as 225% (according to the National Conference on State Legislators) between 1990 and 2010. That rate of enrollment growth, which far exceeds that of traditional liberal arts and research-focused higher education, is driven by a number of forces, including demographic and economic shifts, changes in the modes of delivering education, and changes in institutional quality and accessibility. The forces are largely organic and involuntary, reflecting the changing nature of our nation, our economy and the generations that attend colleges and universities. They are also generally benign and constitute factors which policy makers need to attend, harness and direct, not resist or deny.

Specifically, the population of students attending post-secondary colleges and schools has changed substantially since the baby-boom generation began graduating from high school in the mid-1960s and immediately began pursuing certificates, diplomas and degrees. Today's college population includes a substantial percentages of students who have deferred post-secondary education in order to first serve the nation's security needs in the armed services, or to support a family through immediate employment, or to start and raise a family. In all of these cases, students need access to education that complements their lifestyle and time resources. For many of them, traditional higher education requiring full-time attendance Monday – through Friday during normal business hours conflicts with their employment and domestic obligations. They need access to educational delivery modes nights and weekends, in-

person and on-line, at an intensity level that fits with the other demands on their time and energy.

The student services infrastructure at career colleges and schools play a vital role in making the alignment of lifestyle and attendance mode happen effectively. ACICS develops, revises, and applies standards for student services that reflect the integral role of these considerations in ensuring students persist in their studies and successfully graduate. ACICS recruits and deploys experienced, professional student relations experts to review and evaluate the effectiveness of student financial aid, admissions and enrollment operations.

The character of the U.S. economy has changed substantially in recent decades as well. Access to middle-class economic status through employment in heavy industries or manufacturing has substantially diminished, leaving high school graduates with fewer employment options for applying their high school credentials. Instead, many of the entry-level careers that once required only a high school diploma have been professionalized as more technical and specialized skill sets are demanded by employers. Available workforce training and education resources must align with employment fields that are experiencing growth, and the educational experience must prepare the students to contribute to the workplace effectively.

As an accreditor of career-oriented institutions, ACICS places heavy emphasis on the ability of graduating students to put their education to use in their chosen field. Evaluating that outcome is a key part of the evaluation and accreditation process. ACICS has years of experience closely analyzing student retention and graduation rates, job placement data, academic quality, student learning potential, and student and employer satisfaction. The emphasis is on ensuring the most positive, productive and effective educational experience at each college and school holding a grant of accreditation from ACICS, so that their graduates may compete effectively for opportunity in the workplace. Student relations evaluators with expertise in career services apply strong scrutiny to the job placement operations at member institutions as a normal part of the accreditation process. Effective accreditation evaluates the quality and integrity of institutions in placing student in the workplace, and rewards schools with high degrees of student satisfaction, retention, graduation and job-placement.

The modes for delivering education have changed significantly as well. Electronic technology and its broad mastery by the college-age population enable education to be accessed in many ways other than exclusively in-person, on-site. On-line synchronous and asynchronous education affords students with full-time jobs and young families the opportunity to blend modes of access to classroom instruction. In many ways, it enhances their ability to deepen and broaden their interaction with faculty and students in their cohort. ACICS deploys distance learning experts to evaluate the effectiveness and best practices of on-line programming at member institutions.

Last but not least among the forces driving more enrollments toward career colleges and schools are the changes in institutional quality and integrity that come from heightened scrutiny by the public and policy makers, increased competition for students, and enhanced vigilance by the self-governed system of accreditation. Stronger expectations and commercial competition have forced career colleges and schools to innovate, adapt and streamline. Many

have adopted business models and organizational structures that spread common cost over a broader base, minimize extraneous costs, and focus the bulk of institutional resources on delivering educational services. Those adaptations constitute some of the primary innovations and transformations that keep the U.S. higher education the envy of the world, and a key resource for maintaining and expanding the nation's economic viability.

ACICS develops, applies and adjusts its methods and standards of accreditation to fit with the innovative structures and operations of member colleges and schools. Reflecting that the single campus is no longer the only appropriate unit of measurement and evaluation, ACICS has developed and is testing a system of accreditation unique to multi-campus systems. ACICS recognizes that in the contemporary world of career colleges and schools, no two campuses may be alike in terms of locus administrative support, locus of academic control, locus of budget control and authority, access to student support services and library resources, and in many cases, proximity to the faculty.

Accreditation needs to adapt and adjust in order to remain ahead of how quality and integrity is defined at these innovative colleges and schools, and how it is measured, evaluated and tracked. These are salient issues for college students and taxpayers; the intimacy and currency of knowledge and proximity to the institutional operations makes ACICS uniquely qualified and competent to review the various and dynamic aspects of institutional quality, with a strong emphasis on optimizing educational outcomes for students who invest their time, energy and financial resources.

It is important that accreditation reform considered by the committee avoid adopting single or specific standards to which all career colleges and universities would be held. ACICS supports elements of current accreditation policy that enable accreditors to establish appropriate standards for student learning and achievement on an institution by institution basis, reflecting the unique missions, student population and economic circumstances of each college or school.

ACICS also would advise the Committee against reforms that might have unintended consequences of undermining the innovation, responsiveness and flexibility of career education institutions to meet the needs of employers and the workforce. Instead, ACICS endorses full disclosure of a robust, empirical set of indicators of institutional quality to prospective students so they can make informed decisions

Finally, ACICS considers states to have an important role to play in consumer protection. While it is true that the roles of state licensing and regulatory entities frequently overlap with that of accreditors and the Department, in general that duplication is healthy and has value. It is only when the overlap creates protracted, persistent conflicts of direction to the institutions that it becomes counter-productive and distracting.

ACICS would endorse reforms that enhance the consistency of regulation and expectations across states boundaries. For those institutions that control campuses in multiple states and for those that operate on-line programs, the conflicting and varying standards of compliance deflect resources from serving students.

ACICS has a unique and important perspective from which to offer these observations and considerations. Our standing in the discussion about the reformation of accreditation is established by our long institutional standing in the post-secondary education community. Founded in 1912 as a voluntary quality assurance for an association of business schools, ACICS has grown to become the largest accreditor of private post-secondary institutions offering degree programs in the U.S. ACICS accredits more than 820 institutions in 46 states and nine foreign countries, serving a combined enrollment of more than 700,000 students. ACICS was first recognized as a reliable authority on institutional quality and integrity in 1956 by the federal government, and has been continuously recognized every five years ever since. Furthermore, ACICS was recognized by the Commission on Higher Education Accreditation (CHEA) in 2001, and retains good standing with CHEA.

Of the litany of state, federal, and independent entities that scrutinize and review institutional performance regarding student retention, academic process, student learning, student and employer satisfaction, and job placement in the field, none have more direct and recurring access to the data necessary to evaluate these factors than national accreditors. ACICS serves as effective eyes and ears on the ground at each of the career colleges and universities to which we have granted accreditation.

ACICS is an important resource for ensuring that college graduates to hit the ground running, make a positive contribution to the economy, and become resources to their communities and families. ACICS' accreditation authority is recognized for all 50 states, from the diploma and certificate level all the way through master's degrees. That broad, comprehensive scope allows ACICS to effectively accredit large national and international institutions of higher education. Furthermore, ACICS conducts rigorous review of institutional finances to ensure stability for students, regardless of growth rate or corporate and organizational structure.

In summary, ACICS serves as a model for the accreditation of career education institutions. ACICS stands prepared to serve the Committee as an information and professional resource regarding reforms to the framework of private post-secondary educational quality assurance we have proudly help to build during the last 100 years.