

Assuring the Quality and Integrity of Postsecondary Education

Does Oversight Need Overhaul?

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Introduction

With student loan debt in the U.S. exceeding \$1 trillion, many Americans, funding sources and policy makers are asking exactly what they are receiving for the investment. The answer is complicated. Some postsecondary education may be excellent but aimed primarily at intellectual inquiry, not skills development and job placement. Or an institution may be successful at preparing students for work in fields where demand is temporarily weak or non-existent. Or the institution's educational mission has little or nothing to do with the job market at all.

Students attend college for many reasons. While a handsome return to the U.S. economy—in terms of a higher skilled workforce, more tax revenue and more vibrant communities—is desirable, answering the question comes down to assessing educational quality. Regardless of the type of institution the student elects to attend, is that college or university achieving its mission and, as a result, providing a quality education in return for the investment? In short, is a postsecondary education worth paying for? And who decides, using which standards? These questions have confronted students and educators long before the federal government offered grants and subsidized student loans.

This essay examines how postsecondary education quality should be assessed and its integrity safeguarded. For decades, the role has been shared by a triad of partners: the federal government sets eligibility policy for participation in its loan and grant programs, which are essentially voucher programs where funding follows the student, rather than flowing directly to the

Institution; state higher education commissions control the licensure of institutions and uphold consumer protection laws; and accreditation agencies, working with college and university members, conduct a multifaceted process of internal self-assessment and independent review. For a variety of reasons, the effectiveness of the triad to provide oversight is under intense scrutiny.

Should the quality assurance of America's colleges and universities be dramatically reformed or comprehensively overhauled? Should the federal government play a larger role? Should accrediting agencies be scaled back or should their power to determine eligibility of an institution to participate in federal student aid programs be removed? Is the current oversight system broken? At the end of the day, is the American taxpayer subsidizing the delivery of quality postsecondary education or is the tripartite process of marginal value in answering these vital questions?

The Accrediting Council of Independent Colleges and Schools (ACICS), the accrediting agency for more than 960 postsecondary institutions, believes the oversight system should be reformed but not reformatted or replaced. While the oversight system is tripartite, much of the critical inquiry is focused on accreditation. Ironically, the system of independent, voluntary, self-governed accreditation in the U.S. has worked well for more than a hundred years, contributing substantially to the development of the world's greatest postsecondary education system.

It wasn't always that way. Accreditation began in the late 19th century primarily to help high schools prepare students while attempting to cope with disparate and conflicting college admissions requirements. Regional associations formed to focus on the issue of admissions standards. Philanthropists like John D. Rockefeller and Andrew Carnegie helped energize the impetus for accreditation, insisting on the adoption of standards before bestowing their largesse on the more fortunate postsecondary institutions.

Accrediting agencies evolved to become not just educational standards developers but the guardians of educational quality. The Korean GI Bill helped. Burned by fraudulent, fly-by-night education providers following World War II, Congress wrote a new bill limiting GI educational benefits to only those students attending accredited institutions recognized by the U.S. Commissioner of Education. In effect, the federal government deferred to the judgment of accrediting agencies regarding institutional and program quality, and thereby the protection of public resources.

Sixty years later, accrediting agencies continue to act as the gatekeeper for federal financial aid programs. In "outsourcing" the aid eligibility determination to recognized accreditors, the government accepted the validity of a process composed of self-assessment, peer review, continuous improvement and, if necessary, sanctions. At present there are six regional accrediting agencies and several national institutional accrediting agencies, including ACICS, who perform this gatekeeper function on behalf of the federal government.

Primary Modes of Inquiry

Regardless of accreditor, every postsecondary accreditation evaluation combines elements of internal and external review. The process is involved, demanding and time-consuming by design. A rushed or superficial examination would ill-serve the purposes of objective inquiry, fact-based judgment or assurance of educational quality and institutional integrity.

Setting a high bar means only those ready to meet the standard see the process all the way through. Every year, for instance, dozens of institutions contact ACICS to express interest in becoming accredited. About 25 percent of the schools are simply not ready to proceed. For those who do make a formal application, only 17.5 percent receive accreditation on their first attempt. The ACICS accreditation process on average takes about 18 months.

Once ACICS determines that an application is full and complete, it conducts a resource visit during which ACICS evaluators determine whether the institution is ready to begin the self-study, a multifaceted process involving the candidate school's administration, faculty and staff. Self-study is at the heart of accreditation. The process is comprehensive and documents to the accreditor the institution's operating mission, purpose, business plan, finances and other information regarding instruction and education. The self-study also establishes a strong, empirical point of reference for the ACICS site visit team.

Through observation, interviews and file review, a multidisciplinary team of independent subject matter experts works to verify, authenticate and understand the representations made in the self-study. Site visits generally last at least three days. Reviewers participate in a variety of activities, including sitting in on classes, monitoring financial aid discussions with students, and monitoring the work of admissions representatives as they interact with their prospective students. Staff and faculty are interviewed to assure that the institution is operating in accordance with standards. A typical site visit with up to six or eight reviewers includes checks on thousands of pages of documentation, including faculty credentials, student transcripts and financial records.

The evaluation team produces a report of its findings that is shared with the school. Both the team report and the response from the institution are submitted to the Accreditation Council for review and a decision. Upon receiving a grant of accreditation, institutions are required to disclose and receive approval of material changes to ownership, new programs, new campuses or changes in location. In addition, every institution must submit annual audited financial reports and indicators of student achievement. An initial grant of accreditation is typically for a period of three years. Once accredited, schools are required to reapply for accreditation at least every six years.

In addition to what institutions report about themselves and what the accrediting agency gleans through scheduled site visits, accreditors use numerous other channels to make or modify an accreditation decision. For instance, ACICS accepts and investigates complaints about institutions from students, faculty, staff, members of the public, government agencies and other stakeholders.

Full and complete information transparency is critical to a successful scholastic experience. ACICS believes that students have the right to know the licensing and accreditation status of their

institutions, faculty credentials and facilities completeness, program costs, the availability of aid and how it is disbursed, how the institution determines satisfactory academic progress, due dates for tuition and fees, refund policies, grievance policies, and transfer of credit policies.

In resolving grievances that arise from these and other issues, ACICS expects the parties to seek satisfactory resolution through the institution's internal grievance process. ACICS acts on complaints that have not been resolved through the school's internal grievance process which demonstrate a well-documented potential violation of its Accreditation Criteria. Institutions found in violation of the Criteria may be deemed out of compliance and face sanctions up to and including withdrawal of accreditation.

Other third-party information can influence accreditation status, including information generated by the news media, state approval authorities and the U.S. Department of Education. Once the information is verified, ACICS may launch an adverse inquiry, giving the institution the opportunity to explain the situation in writing. Such inquiries may result in no action, provoke a show cause directive or, if the facts are egregious and indefensible, a decision to withdraw accreditation.

ACICS will add a new check on the integrity of information schools report. Starting with a pilot in 2014, ACICS will launch a new program of independent job placement auditing. This major undertaking will involve the accrediting agency conducting an on-going series of telephone calls to graduates in order to verify employment in a relevant career field. The random survey will be used as an independent check on an institution's self-reported placement rates. Schools misrepresenting their placement rates will be required to undertake remedial actions or face sanctions. ACICS expects the program will involve up to 30,000 employment verification calls a year.

In addition to an affirmative decision to grant accreditation to new applicants, ACICS may:

- Defer a decision until the applicant supplies sufficient information or takes the corrective actions necessary to come into compliance with Accreditation Criteria;
- Deny accreditation to an entire institution or to a campus of that institution;
- Remove accreditation from a school where a current grant exists.

While not perfect, the process of independent, third-party accreditation has helped make U.S. higher education pre-eminent around the world. Peer review, a critical component of accreditation, brings subject matter experts to the table in numbers and at levels of professional accomplishment that would simply be difficult if not impossible via alternate approaches. At the same time, the independent nature of the process safeguards academia from undue influence by powerful constituencies, whether governmental, religious, political or others.

Balancing Educational Access and Quality

One approach to raising the quality of a postsecondary education would be to raise admissions standards to the point where only the most academically qualified students could gain entry; to hire only pre-eminent scholars as faculty members; and to teach and test against the most rigorous curriculum.

With more than 21 million students enrolled in postsecondary education in the U.S., assuring quality through elitism is not feasible. College award attainment is a widely shared national priority. The rewards of earning a college degree over a high school diploma are well documented. A Pew Research study, for instance, finds the typical high school graduate earns roughly \$770,000 over 40 years, while a typical worker with an associate's degree earns about \$1 million and a typical worker with an undergraduate degree earns \$1.4 million in the same timeframe.²⁷ Congress has recognized the value of a college educated workforce by enacting the Guaranteed Student Loan program, the Pell Grant program, and other financial aid programs that make postsecondary education more accessible to a larger segment of America.

The college going population is vast and highly diverse, ranging from college ready students pursuing a postsecondary education directly from high school to high school dropouts seeking a postsecondary credential after years spent in low wage jobs. While traditional notions of a higher education may conjure up images of young people spending four years in residence on an academic campus, the reality is quite different:

- More than a third of all students attending college do so on a part-time basis;
- Approximately 45 percent of college students are minorities;
- Over one-thirds of students attend two-year institutions;²⁸
- Thirty-eight percent of college students are age 25 or older;
- More than a third of students transfer within five years;²⁹
- Average family adjusted gross income for students at very selective colleges is almost twice that of students attending open admissions colleges such as community colleges and many career colleges and schools (\$84,500 versus \$47,600).³⁰

In the face of this pluralism, postsecondary education in the U.S. must be as diverse in formats and access points as the student population it seeks to serve.

Congress has acted to safeguard the nation's economic future by investing in higher education and a comprehensively skilled workforce to meet the challenges of a global marketplace. The

²⁷ <http://www.pewsocialtrends.org/2011/05/15/is-college-worth-it/6/#chapter-5-the-monetary-value-of-a-college-education>

²⁸ <http://www.insidehighered.com/news/2012/10/10/enrollments-fall-first-time-15-years>

²⁹ http://www.studentclearinghouse.org/about/media_center/press_releases/files/release_2012-04-19.pdf

³⁰ <http://www.forbes.com/sites/janetnovack/2013/09/06/how-obamas-college-reform-plan-could-hurt-low-income-students/>

determination of lawmakers to protect the taxpayers' investment by seeking to assure the quality and integrity of education is laudable. But balancing the demands of broad access with reasonable quality is complicated, sophisticated, nuanced, and hands-on; it resists gross abstractions or one-size-fits all aggregations.

Federal Role in Quality Assurance and Proxy Measures

Gross abstractions and proxy measures are some of the measures in place to serve as an additional quality check on taxpayer investment in higher education, especially career education offered by for-profit companies. Such measures are the Cohort Default Rate (CDR), the 90/10 provision, and new proposed Gainful Employment standards.

Enacted as part of the Higher Education Act of 1965, CDR is a measure of the percentage of student borrowers who fail to repay their student loans in a specified period of time. Institutions with a CDR of more than 40 percent in one year or more than 25 percent in three consecutive years lose eligibility to participate in federal student aid programs. Implicit in this sanction is the notion that recipients of a valuable postsecondary education should be able to secure reasonable employment and repay their student loans.

The idea of CDR as proxy of quality fails to consider important facts, such as that the socioeconomic circumstances of the student, not the quality of the institution, have the greatest power to explain a borrower's performance in repaying his or her student loans. Economically disadvantaged students attend college to improve themselves. That said, such individuals still lack the financial cushion and social networks that so often ease the transition from school to meaningful employment for their more upscale counterparts. For less affluent students, budgets are far tighter and the impacts of an unexpected occurrence—a broken automobile transmission, a burst water pipe or a sick relative—can be devastating.

Career colleges, educating a substantially higher percentage of at-risk students, are likely to have much higher cohort default rates than other types of institutions. When looking across institutions of any type, those with more than 60 percent Pell grant recipients all have high cohort default rates. As a proxy of quality, the CDR simply reveals the obvious: if loan repayment performance is the criteria, institutions educating the wealthy are likely to deliver a "quality" education; institutions educating economically disadvantaged are less likely to do so. In point of fact, rather than providing insight regarding educational quality, the CDR simply perpetuates problems with access because it incentivizes risk-averse institutions to limit the admission of less affluent students.³¹

These factors notwithstanding, ACICS recognizes that robust financial aid counseling is an important facet of institutional responsibility, performance and conduct toward all students. ACICS

³¹ Cohort Default Rates in Context: Key Factors Driving the Differences in Student Defaults in Institutions of Higher Education, APSCU, February 2011

monitors the cohort default rates of its accredited member institutions and requires improvement plans from those schools approaching the federal limits.

The 90/10 rule disqualifies from Title IV participation those institutions receiving more than 90 percent of their revenue from guaranteed student loans and Pell grants. This provision of the Higher Education Act applies only to for-profit institutions. The rule assumes that schools of reasonable academic quality should be able to generate 10 percent or more of revenue from students drawing from private sources or sources other than the federal student financial aid.

Like CDR, 90/10 rule is much more likely to reflect the economic circumstances of the population served than the quality of education offered. Unlike CDR, the 90/10 rule does not apply to institutions regardless of type. If it did, a majority of public colleges would fail this test, including 80 percent of community colleges.³²

Originally enacted in 1992 as the 85/15 rule, 90/10 seeks to stem abuses of federal student financial aid programs. With the advent of the Internet, rating sites, chat rooms and social media, the opportunity for diploma mills and other bad actors to operate in the shadows, prey on unsuspecting students and feast on taxpayer dollars has diminished.

90/10 has become a blunt instrument more likely to limit the access of low income students to worthy vocational programs than to punish disreputable schools. Of 2057 schools audited in the 2011 and 2012 academic year, 29 schools received more than 90 percent of their revenue from Title IV sources. Of this total, 28 schools had a 90/10 ratio of less than 90 percent in the preceding year, thereby remaining eligible to participate in federal student aid programs.^{33, 34}

By contrast, ACICS has acted more than 1,100 times in the last five years to defer, deny or remove accreditation to schools or to investigate compliance issues at greater length. These totals suggest that accreditation is a more effective enforcer of quality and integrity.

Yet the government's quest for proxy measures continues. The U.S. Department of Education's proposed gainful employment rule is the most recent example. The proposed rule seeks to indirectly determine the quality of programs at career colleges and other institutions with vocational programs. The rule would require student records to be linked to social security records to determine whether graduates' earnings meet or exceed a pre-specified debt-to-income ratio. A second test would determine if the ratio of a borrower's student loan debt to discretionary income meets a specified threshold. Schools failing the ratios in multiple years would lose Title IV program eligibility.

The original gainful employment rule stalled when a federal judge blocked its imposition. The Department of Education issued a revised draft in September 2013.³⁵

³² <http://www.career.org/news-and-media/sector-news/upload/9010highlights.pdf>

³³ <http://studentaid.ed.gov/sites/default/files/fsawg/datacenter/library/9010LetterKline2013.pdf>

³⁴ <http://studentaid.ed.gov/about/data-center/school/proprietary>

³⁵ Paul Fain, "Now What?", Inside Higher Ed, March 21, 2013

While the attempt to assay the value of a higher education has merit, the gainful employment rule would be more credible if applied to all colleges and universities, not just mostly for-profit career colleges.

Education for education's sake may have once been an American ideal, but today a larger percentage of adults believe higher education is about workforce preparation. A 2011 survey by Pew Research shows that 47 percent of respondents say the mission of college is to teach work-related skills; 39 percent say the main purpose is personal and intellectual growth.³⁶ The proposed gainful employment rule ignores the fact that most postsecondary institutions educate, develop skills and prepare traditional and non-traditional students for careers and upward mobility. By targeting only institutions serving lower income at-risk students, the gainful employment rule acquires all of the inherent biases of CDR and 90/10; it is likely to produce little significant insight regarding relative institutional quality.

Other Oversight Shortfalls

The shortcomings of federal regulation do not imply that accreditation is perfect or foolproof. On the contrary, criticisms of the accreditation process as being both costly and time-consuming are as old as the process itself. For example, in 1939, John J. Tigert, a former U.S. Commissioner of Education and president of the University of Florida, called accrediting agencies too numerous, too intrusive, too nitpicking, too willing and able to impose uniformity on schools, and, all in all, just too much trouble. By 1949, many colleges and universities had formed the National Commission on Accrediting with the stated purpose of dealing with a multitude of accreditors.

"We felt that the only possible way to bring some kind of order out of chaos from our point of view was to get the educational institutions united in some kind of stand," said Reuben G. Gustavson, chancellor of the University of Nebraska. However, when the Commission, intended to be a check on fractious accreditors, tried to tell its member schools how to deal with accrediting agencies, some schools balked. They resented the outside interference.³⁷

A particularly stinging modern day critique of accreditation comes from the Center for College Affordability and Productivity:

If the nation were starting afresh on accreditation, we predict it would devise a radically different system than the one it has become over the past century. Would we have multiple regional accrediting agencies? We doubt it. Would the accreditors be private entities largely controlled by individuals themselves affiliated with the institutions that they certify? We doubt it. Would accreditation largely be "an-all-or nothing" proposition, where institutions are simply "accredited" or "non-accredited" with few distinctions in between? We doubt it. Would an accrediting mechanism be

³⁶ <http://www.pewsocialtrends.org/2011/05/15/is-college-worth-it/>

³⁷ William K. Selden, Accreditation, a Struggle Over Standards in Higher Education, Harper & Brothers, 1960

permitted where key elements of the assessment are not available for public review? We doubt it. Would accrediting that sometimes emphasizes inputs rather than outcomes be permitted? Again, we doubt it. In short, there are numerous characteristics of today's system of accreditation that are subject to questioning and criticism.³⁸

Like any published standard, accreditation criteria are ultimately rules that can be closely studied, strategized against and, if the institution is so inclined, circumvented. Some of this activity is subtle, some more blatant. Sample practices include:

- Compiling Office of Postsecondary Education ID (OPEID) numbers. Nationally accredited schools must meet certain outcome metrics in areas like program completion and job placement to earn and retain their accreditation. Unlike regional accreditation which applies to an entire university system, national accreditation is granted on a campus by campus basis. Multi-campus schools may vary in their outcomes performance. To protect the accreditation of weaker campuses, the institution may report with a single, aggregated OPEID number. One number for the entire system allows the school to report a system-wide average rather than numbers for each individual campus.
- Accreditation shopping. While there are many valid reasons to change accrediting agencies, institutions sometimes choose this course when standards are perceived to be less stringent or when a grant of accreditation seems more likely to be gained.³⁹ The move from one agency to another may also be an attempt to cut costs, eliminate troublesome requirements or to gain marketplace advantage. The shift from national to regional accreditation is a case in point. One obvious difference is the mandate of nationally accredited institutions to track and report outcomes and to meet certain performance thresholds in order to be accredited. Regionally accredited institutions do not report on outcomes as a requirement of accreditation. While some for-profit, career focused institutions see regional accreditation as a step along the way to being recognized as a full university, others may simply switch to shed a troublesome rule or to leverage regional accreditation in pursuit of a national or international online presence.
- Manipulating the cohort default rate calculation by encouraging students into deferment or forbearance. Rather than provide financial aid counseling that includes extended loan repayments or income-based repayments, schools may aggressively promote deferring payments. While this may appeal to students in the short term, deferment allows interest on loans to build and adds to the financial burden students will ultimately face.

³⁸ <http://www.centerforcollegeaffordability.org/uploads/Accreditation.pdf>

³⁹ <http://scholarship.law.duke.edu/cgi/viewcontent.cgi?article=4256&context=lcp>

College ranking systems published by U.S. News and other magazines have long been considered an indicator of institutional prestige (if not quality). Most recently, the White House has proposed having the federal government enter this sphere, albeit with a twist. Rather than rank schools, the federal government would rate institutions based on criteria such as student body diversity, completion rates, costs, average student loan debt and average graduate earnings. The proposal moves away from the “beauty contest” nature of college rankings and better aligns the evaluation of institutions with their specific mission and purpose. However, other aspects of the proposal are problematic, including the linkage of federal student aid award amounts to college ratings. Such an approach would do little to improve opportunities for postsecondary access, while in all likelihood it would undercut the ability of poorly rated schools to adapt and adjust.

Reacting to the proposal, American Council on Education President Molly Corbett Broad said, "This is extraordinarily complicated stuff, and it's not clear we have the complete data or accurate data."⁴⁰

Complicated or not, the proposal is based on self-reporting, requires no independent auditing or verification, suggests no penalties for misreporting and ignores the willingness of even leading institutions to game ranking systems in order to improve their standing.⁴¹ Examples include outright misrepresentations about graduation rates, test scores, student retention rates, full-time faculty counts and related matters.

Other practices aimed at manipulating the system are more subtle. For instance, student admissions for the under-performing have been staggered to improve the average SAT scores of fall enrollments. More callous still, unqualified students have been encouraged to apply for college admission by some colleges and universities in order to increase rejection rates, thereby bolstering the perception of selectivity.⁴² So-called Fast Apps are used to artificially inflate the number of admissions applications a college receives and thereby create a bogus impression of demand.⁴³ One prestigious institution increased its average SAT scores by reporting on those of students admitted rather than enrolled and misrepresented the class rank of its enrollees.⁴⁴ Sadly, a survey by *Inside Higher Ed* reveals that more than 90 percent of admissions directors believe that their counterparts at other institutions submit false data to ranking systems such as *U.S. News & World Report*.⁴⁵

This type of prestige-driven oversight is hardly a worthy candidate to replace substantive, standards-based third party oversight and peer review.

⁴⁰ http://www.huffingtonpost.com/2013/08/22/obama-bus-tour_n_3794114.html

⁴¹ <http://www.wiredacademic.com/2013/03/subterfuge-skull-dudgery-in-the-college-rankings-game/>

⁴² <http://www.nytimes.com/2012/02/01/education/gaming-the-college-rankings.html?pagewanted=all>

⁴³ <http://www.propublica.org/article/the-admission-arms-race-six-ways-colleges-can-game-their-numbers>

⁴⁴ <http://blogs.ajc.com/get-schooled-blog/2012/08/17/rattled-by-rankings-emory-inflated-student-test-and-grade-data/>

⁴⁵ <http://www.insidehighered.com/news/survey/feeling-heat-2013-survey-college-and-university-admissions-directors>

Enhancing Current Accreditation Processes

Accreditation promotes continuous process improvement for institutions. By the same token, the “institution” of accreditation must be similarly open to the opportunity for process improvement and, to remain relevant, the inevitability of change. Enhancements to the current accreditation process worthy of further consideration include:

- Using a federal database of student unit records as a significant input to considerations of quality for institutions of all types, not just career focused institutions. Converting to student unit records would help clarify the linkages between primary, secondary and postsecondary education; between the classroom and the workplace; and between skills and careers. Across the board utilization of student unit records would reduce if not eliminate unfair comparisons of schools. This approach would help assure “apples to apples” quality assessments based on institutions with substantially similar educational missions, admissions policies, tuition costs and other factors (<http://www.acics.org/news/content.aspx?id=5758>);
- Allow accrediting agencies reasonable access to a federal student unit record database. Accreditors could use such records to look across schools and tighten accreditation criteria based on group performance. Student unit record measures could be used to supplement self-assessment and on-site evaluation and document review. The metrics could foster continuous process improvement and measure performance in new focus areas;
- As noted, accreditation is often criticized for being too time consuming and labor intensive. To the maximum extent possible, utilize student records in standard formats that support self-assessment, peer review and new focus area metrics. At the same time, set standard thresholds for data tracking and reporting across Department of Education recognized accreditation agencies so that accreditation shopping becomes less attractive;
- Accrediting agencies collect and share school best practices as a method of facilitating continuous process improvement among their members. The best practices of accrediting agencies themselves could also be gathered, analyzed, summarized and shared to foster improvement of the accreditation process itself.

Conclusions

Many Americans are frustrated by the rising cost of college tuition and, oftentimes, the failure of a high-priced college education to translate immediately into well paid and directly relevant professional careers. While the nation’s conventional wisdom holds that the path to upward mobility leads through college or university matriculation, the widespread borrowing needed to pursue this course has triggered an intense interest in reassessment.

A weak economic recovery following a prolonged recession no doubt has contributed to the public's frustration, but policymakers, parents, students and other stakeholders are looking for alternative ways to assess the quality and integrity of the postsecondary investment.

In seeking new modes of scrutiny, critics of independent, sector-based accreditation should not overlook its substantial benefits. Not the least of these are the nurturing and safeguarding of a system of postsecondary education unsurpassed anywhere in the world. While other nation's struggle to establish a tradition of academic freedom, colleges and universities in the U.S. operate in a manner that bolsters independent inquiry and research, intellectual debate, pedagogical advancement, dissent from popular opinion, protection from retaliation and similar virtues.

Accreditation can, no doubt, benefit from reform. Changes should be carefully considered, inclusive of all stakeholder points of view, and add to an already valuable system of oversight and review. Value-added reforms could, for instance, identify new metrics produced from student unit record data and use these to supplement and extend current oversight practices. Regardless of the approach, reform should apply to all accreditors equally, not just those accrediting career colleges and vocational programs. Proxy measures of institutional quality and integrity should never be substituted for actual measures.

ACICS welcomes engagement on these topics and the opportunity to work with informed parties on initiatives that would enhance educational quality for students, improve the performance of institutions and yield a better return on investment for all funding sources. Any overhaul of the current system of oversight must be guided by a loyalty and respect for these principles and considerations.