

TESTIMONY  
OF  
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ON

“ACCREDITATION AS QUALITY ASSURANCE: MEETING THE NEEDS  
OF 21<sup>ST</sup> CENTURY LEARNING”

U.S. SENATE  
COMMITTEE ON HEALTH, EDUCATION, LABOR AND PENSIONS

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Good morning, Chairman Harkin, Ranking Member Alexander and Members of the Committee. My name is Dr. Dan Phelan and I am president of Jackson College in Jackson, Michigan. Located about 80 miles west of Detroit, Jackson College educates more than 8,000 credit and 2,000 non-credit students annually in a tri-county service area. Jackson College is institutionally accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools, the largest of the six regional accrediting bodies. I have worked closely with the Higher Learning Commission over the years, serving as a Consultant-Evaluator for the Commission, with prior tenures on its Institutional Actions Committee and a number of other ad hoc committees. Jackson College participates in the Commission's alternative accreditation program, known as AQIP or the Academic Quality Improvement Project. AQIP is based upon the Malcom Baldrige National Quality Award criteria, which uses a 7-year review cycle coupled with annual reporting. Jackson College also has a number of supplemental program accreditations, primarily in the career areas.

I am pleased to be here today to present my own views as well as those of the American Association of Community Colleges (AACC). AACC represents the nation's more than 1,100 community, junior and technical colleges.

Without question, higher education is undergoing remarkable and rapid change. This change is born of new developments in technology, changes in funding, global competition, and rising expectations for accountability from parents, students, employers, and government agencies. Accreditation is no exception to this changed reality. Expressions of concern about quality in higher education, confusion over the accreditation process itself, anxiety about student outcomes, and calls for increased transparency have all led to suggestions that accreditation is broken. Yet we believe these critics are wrong. Permit me a few moments to discuss accreditation, its current context, and where it may be headed.

## **Accreditation's Peer Review Process is Partially Responsible for the Success of American Higher Education**

America's colleges and universities, including its vibrant community college sector, are among the nation's greatest assets, reflected in a broad range of metrics. College attendance correlates strongly with higher income, better health, greater political participation, marital stability, community engagement, and many other positive outcomes. A college education is valued highly by all major segments of the American public, and college graduates show strong support for their alma maters. Higher education remains a huge net exporter, with international students flocking to America's colleges in record numbers after significant post-9/11 declines.

This great success is due in part to the system of voluntary accreditation, which predates the Higher Education Act by more than a hundred years. Accreditation has enabled institutions to gauge how they are performing institutionally and relative to their peers, helping them to benefit from their experience, knowledge, and objectivity, which they then offer, in turn, to other institutions through the peer-review process. It serves as the 'gold standard' by which institutions are evaluated, giving assurances to parents and students themselves regarding quality, governance, instruction, fiscal soundness, student success, and the like. It gives assurance to peer institutions that credit hours earned merit acceptance at transfer institutions, and it permits students to receive federal financial aid.

Campus officials, faculty, and others in the campus community take accreditation extremely seriously and are deeply invested in the process, a reality that seems to have gotten lost in the current policy debates. It should be remembered that the resources that colleges devote to accreditation were also committed in years where there was no "gate" to the Title IV programs that accreditors watched. I personally view this use of staff and financial resources as a sound investment keeping Jackson College focused on the value-added nature of our work, and its continuous improvement.

I firmly believe that, at minimum, regional accreditation generally ensures that certain quality standards are met. While relatively few institutions lose accreditation, attaining

accreditation initially is a significant achievement that takes substantial effort, resources, and time, and institutions often struggle to retain their accreditation when they are reviewed.

Nevertheless, accreditation alone cannot be expected to cure whatever might be said to ail higher education, and it neither can nor should foster all the institutional change that our world demands—in a word, accreditation cannot simply be equated with institutions. Educational policy and related decisions are better made by presidents/chancellors and local boards of trustees, after obtaining input from local advisory groups, faculty experts, employers, and research. The market will then determine the relevancy of these institutions in meeting local and regional demands. For their part, state and local governments must provide funding sufficient to maintain sufficient quality standards and programmatic depth.

### **Changing Higher Education Means a Changed Context for Accreditation Policy**

More students are going to college than ever before, and more students of different ethnic, experiential, economic, and cultural backgrounds are enrolling. The extraordinary increase in access to college, facilitated in large part by the Title IV programs, has created this starkly different student body. Currently, only 27% of all college students are of the traditional 18-22 age, and the percentages of low-income and minority students attending college has increased substantially. At community colleges, about 60% of all students are part-time.

Consequently, when evaluating the overall effectiveness of the higher education system and the specific role that accreditation plays in it, policymakers should remember that, over the last forty plus years, the scope of higher education has expanded dramatically, particularly in the case of community colleges and for-profit institutions. Without in any way absolving colleges of their obligation to serve all students well, these changes in the student body mean that expectations for the system need to be rethought. For example, graduation rates that were attained during times of relatively limited student access for well-prepared, largely affluent students will inevitably be different from those when there is much expanded college access.

American higher education remains highly competitive and decentralized. The competition for students, with their differing aspirations, has sharpened the quality of colleges and their programs. While we do not support the Obama Administration's efforts to create a federal ratings system for colleges, the motivation driving this effort is on target, in trying to ensure that prospective students receive the information they need to select the college or program that suits them best. Regrettably, the job is far from complete. We hope that the Administration and Congress will collectively ensure that reasonable, meaningful, and user-friendly consumer information about community colleges and other institutions of higher learning is provided. We do not need more information or reporting, to the contrary, we just need better and better coordinated information. Such an outcome would also help eliminate scores of federal and state reporting requirements that are burdensome to colleges, especially those with limited resources. We also think that institutions and others should ensure that students receive adequate counseling in order to make the best use of the data that are available. A federal role in this area may be desirable.

There has been much discussion of the disclosure of accreditation reviews. Because the federal government relies upon accreditation for quality assessment, it is appropriate to seek maximum disclosure. Most public colleges disclose all materials related to accreditation findings as a matter of course. But we also need to retain a certain amount of room for institutions to engage in tough self-scrutiny, and be assessed equally rigorously by accreditors, without requiring the type of disclosure that would undermine this.

### **Accreditation Does Accommodate Institutional Change and Improvement**

Many negative critiques of higher education and community colleges focus on an alleged unresponsiveness to change. Accreditation is often cited as one of the factors in inhibiting change. Generally speaking, I do not believe that this is an accurate depiction.

At Jackson College, like hundreds of community colleges across the country, we are constantly adding, modifying, and discontinuing programs, while offering some in

different delivery modes and in different time sequences for students. For example, we are creating new programs to meet the needs of business, as well as those needed by students in preparation to transfer. Dramatic revisions of remedial education are well-underway. In Michigan, we are now adding four-year programs on our campuses. At Jackson College we have implemented balanced scorecards to better understand effectiveness, and each month, we provide detailed reporting to our Board of Trustees regarding critical outcomes of the College's work on Board priorities.

Speaking for my campus and community colleges generally, accreditation has not unduly delayed program changes or improvements. It is important that regional accreditors be intentional, thoughtful, and consider the full implication of new requests and new approaches to instruction, rather than simply rush to approve them and then deal with developing problems later. In truth, there are other delays of greater concern in the change process for instructional programs. In most cases, state approval procedures are more of an obstacle.

The reality is that it is in our college's best interest to offer new programs, provide new instructional methodologies, and incorporate newer technology so as to remain competitive and provide for the current and emerging needs of our student and employers. Many traditional institutions of higher education have demonstrated a clear interest in trying to incorporate newer types of programs into their credit structures. A good example of the ability of accreditation to accommodate change lies in the area of distance education. Twenty years ago, online education barely existed. In a study from 2006-7, the U.S. Department of Education found that 97% of community college campuses already offered online education. Other examples include the incorporation of Competency-Based Education as yet another means to provide a more detailed and credentialed announcement of student outcomes.

Despite its critics, accreditation *has* changed its processes. This is perhaps most dramatically illustrated in the area of learning outcomes. All of the regional accrediting agencies now require institutions to have defined learning outcomes, and this has had a significant impact on campuses. Learning outcomes have not replaced the traditional grading system, nor should they, but they are enabling administrators to determine,

better identify and compare common outputs of courses with disparate subject material. In some instances learning outcomes have been implemented at the behest of the federal government, which is a good example of a desirable balance between a stated federal priority and the actions of private accrediting agencies.

### **New Accreditation Vehicles, New Program Structures, and Their Relation to the Title IV Programs**

The perceived shortcomings of institutional accreditation, as currently constituted, have led to a variety of proposals to replace or augment the present structure with dramatically new forms of accreditation, or, more specifically, federal gatekeeping. We believe that radically different models of institutional accreditation for the purposes of Title IV institutional eligibility carry with them high risk, and that Congress should proceed very cautiously in this area. Any new approaches will almost certainly be comprised of quantitative frameworks that raise the question of whether such metrics could ever capture an institution's multi-faceted mission. This is particularly the case with community colleges, with their variegated education and training programs and community responsibilities. Setting that aside, though, the ability of the federal government to generate a system that could be equitably applied to the diverse set of 7,000 institutions participating in the Title IV programs is highly doubtful. Community colleges are particularly wary of the impact that standards of this sort – as well as those that might be applied to the Title IV programs directly via statutory standards – could have on broad access, which remains at the heart of our mission.

We hasten to add that community colleges do not oppose using quantitative metrics in evaluating institutional performance. Indeed, AACC and its members have launched a Voluntary Framework of Accountability (VFA) that relies upon a series of refined metrics to assess institutional performance, including workforce outcomes. AACC believes that a national postsecondary education unit record data system is necessary and that this system should be coordinated with Social Security Administration wage data. But the provision of this data is quite different from driving all of higher education, via accreditation, to meeting national numerical goals. Colleges will respond to the incentives they are given, and a set of federal targets administered through an

accreditation system could have a distorting effect on the community college mission. Please understand that most community college CEOs do not think that performance-based funding is inherently a flawed concept; in fact, many of our campus leaders are entirely comfortable with state policies of this nature. But those *state* approaches provided for a particular *public sector*—not a one-size fits all federal framework.

At the same time, the emerging new forms of delivering education and education design need to be accommodated in the Title IV programs. During reauthorization, Congress should look to establish pilot, demonstration, or similar programs to assess the impact of providing federal support to programs that are not currently eligible for Title IV aid. (This policy should also be applied to programs at currently participating institutions.) For example, a pilot could be created that would allow MOOCs or “badge” programs to be funded through Title IV or some similar source. Such programs could be administered by the U.S. Department of Education, perhaps subcontracting with other entities. Of course, the cost to students of enrolling in these far less expensive programs will be reflected in student funding levels, and quality assessment will remain an issue. It also should be remembered that many of the evolving forms of education are individual courses or program “bits,” and that in the process of taking courses in this fashion students may not actually be enrolled at a traditional institution, creating delivery issues.

Institutions also need to be given greater opportunities to ensure that prior learning assessment and competency-based learning, which date back to the middle of the last century, can be funded through Title IV. The U.S. Department of Education is making important progress in this area.

In funding new types of learning Congress needs to be ever-watchful of the long-term implications of the student support that it provides. The example of for-profit colleges is instructive. These colleges are inconceivable without Title IV funding, commonly brushing up against the ceiling imposed by the 90/10 rule. Many parties believe that much more rigorous oversight is necessary; few would maintain that for-profit colleges are under-regulated. Yet advocates of replacing accreditation with some other type of Title IV “gate” generally assert that more of a *laissez-faire* market for higher education,



taking accreditation out of the triad, would improve the overall quality of the system, presumably by disadvantaging current Title IV-eligible institutions. However, allowing for-profit colleges to act under even *less* regulation is one outcome of this approach as is the potential emergence of “fly by night” providers associated with the early years of for-profit participation in Title IV.

Generally speaking, then, the next HEA reauthorization might most profitably function as one of transition, in which the federal government allows many new program structures to be eligible for federal support that might ultimately lead to a modified triad, without radically changing accreditation’s gatekeeping role.

### **Accreditation and Transfer of Credit**

Community college students continue to suffer from the inappropriate, unnecessary denial of transfer credits to baccalaureate-granting institutions. This is costly, frustrating, unnecessary disillusioning for students, and a huge drain on the effectiveness of the higher education system. Research shows that student success is significantly enhanced when community college students can transfer all their credits. Credit rejection often occurs even between institutions accredited by the same agency, sometimes even among two colleges within the same university system.

Still, I believe that institutions must retain the prerogative to deny credit – otherwise they lose the ability to vouch for the quality and nature of the degrees they confer – but also believe that policymakers need to address the transfer of credit issue more forcefully than they have to date. The current situation is intolerable, despite the progress that has been made in some states and the extensive level of programmatic articulation that occurs between institutions. Because accreditation is an essential part of signaling academic quality between institutions, it needs to be part of the solution. In addition, AACC continues to support a more aggressive federal role in encouraging states to act more positively in this area.

### **Federal Regulation of Accreditors**

In the HEA reauthorization, we urge Congress to help reduce some of the enormous bureaucratic requirements that have been placed on accreditors. Because of its critical role as part of the higher education “triad,” there is a strong need for the government to ensure that accreditation is helping maintain a minimum level of academic quality and institutional stability. But this need has been implemented in such a way as to make accreditors more focused on simple compliance than they should be. Currently, the accreditation statute is ten pages long, and there are 28 pages of regulations and 83 pages of sub-regulatory guidance. This level of micromanagement of the accreditation process serves neither the government nor institutions and their students well.

Thank you for giving me the opportunity to speak with you this morning. I would be pleased to respond to any questions that you might have.