



Recommendations for the Reauthorization of the Higher Education Act

Accreditation is the quality assurance process by which institutions and specialized programs within those institutions are evaluated. These processes are directed at ensuring that colleges and universities serve the interests of the public and are accountable for the expenditures of funds from governmental agencies. Accrediting organizations and the federal and state governments (the Triad) share responsibility in ensuring quality in education and accountability.

Accreditation occurs at the level of the institution (regional and national accreditors) and at the level of the program (specialized and professional accreditors). Specialized and professional accreditors closely examine and evaluate measures of learning or competence that are fundamental to a specific discipline, focused study or profession (e.g. dentistry, religious studies or engineering). Because of their integral relationship with the professions they serve, specialized accreditors play a critical role in ensuring the health and safety of the public by defining standards that require students to demonstrate competence for entry to licensed or professional practice.

In recent history, institutional and programmatic accreditation has been subject to increasing levels of federal oversight. As a result, the central purpose of accreditation - a rigorous process of quality assurance and self-improvement for institutions and programs - has been overtaken by the need to provide assurances to the U.S. Department of Education (USDE) that Title IV funds are being appropriately expended. The USDE now relies on accreditors to serve as the gatekeepers for the expenditure of these funds and, in turn, through its recognition process, prescribes much of what accreditors do. The extensive USDE regulatory guidelines are, in part, a compliance checklist, with little relation to the actual quality of the accreditor or to the programs and institutions reviewed for accreditation.

The Association of Specialized and Professional Accreditors (ASPA) believes that it is possible to balance institutional autonomy, evaluating the academic preparation of entry-level professionals, and accountability for the expenditure of public funds. The reauthorization of the Higher Education Act (HEA) is the time for clearly defining the responsibilities of each member of the Triad. Within that context, ASPA offers the following considerations for the reauthorization.

Principles

- 1. Institutions, programs and accreditors make academic decisions, set standards, and define educational quality;*
- 2. Student achievement is best determined by institutions, programs, and accreditors in partnership with communities of interest;*
- 3. Professional judgment, peer review, and contributions of communities of interest ensure quality in education;*
- 4. Public information about accreditation decisions should serve the public good and allow for quality improvement in higher education; and*
- 5. Specialized and institutional accreditors serve different purposes.*

1. Academic decisions, standards, and educational quality

Requirements for recognition should be streamlined to reduce regulatory burden and allow accreditors to focus on assuring quality and performance improvement.

Accreditors and institutions are best suited to make academic decisions that focus on quality assurance and improvement. The recognition process of the USDE and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) should focus on the review of accrediting agencies against established requirements for recognition. This committee should not extend its mandate to include developing policies on the measures of quality and competency for entry-level practice in a given profession. This is the responsibility of each profession, the specialized and professional accreditor, and the publics they serve.

Accreditors promote innovation while assuring quality - additional regulation is unnecessary. A core value of specialized and professional accreditation is to assure and promote the highest quality in educational programs that prepare competent professionals to practice in their respective professions. Each profession recognizes that practice environments are constantly evolving and thus the competencies required for practice must keep pace with these changes. Specialized and professional accreditation supports innovation while assuring that programmatic quality is maintained. Some examples of how accreditors support innovation include:

- medical education accreditors are working with the American Medical Association to accelerate improvements in medical student education;
- accreditors are embracing innovative curriculum delivery as a way to reduce the cost of education and increase access to professional education, including online courses, prior learning assessment and competency-based education; and
- teacher education accreditors offer different pathways to expand innovative practices in preparation of effective teachers. One pathway focuses on continuous improvement on a particular standard such as program impact.

Specialized and professional accreditors weigh the benefits of any educational innovation with the student outcomes achieved, thus ensuring student competency and quality education. As such, innovative practices are supported that reduce the costs of accreditation while assuring quality is maintained for the learner.

The accreditation review process can be flexible. Language in the HEA and corresponding regulations should not restrict the ability of specialized and professional accreditors to accommodate innovation that allows for flexibility in the accrediting process. Typically, no single measure allows for a determination of quality - the accreditor must ensure compliance with all standards. However, accreditors allow flexibility in the manner in which standards are met, in order to accommodate innovative and effective program delivery. Decisions about acceptable processes are made by the accreditor in consultation with the profession, with recognition of the responsibility to protect the public interest.

Specialized and professional accreditors understand the concerns regarding the increasing costs of higher education. Costs should be understood in relation to the benefits to society and to individual learners entering a profession. Specialized and professional accreditors promote value in relation to societal benefits and costs while assuring that programs maintain high quality standards. Increased regulatory requirements lead to increased costs for both accreditors and the programs they accredit.

Accreditors regularly evaluate processes and standards in relation to benefit and cost considerations, and make changes as appropriate. For example:

- the size of the team and the length of site visits are structured for efficiency and effectiveness;
- some accreditors provide accreditation pathway choices; and
- more and more accreditors are providing electronic resources for programs and allowing online submission of documents to eliminate costs associated with hard copy preparation and distribution.

2. Student achievement

Requirements for recognition should respect identification of student achievement outcomes that are meaningful to the profession as determined by the accreditor and communities of interest.

Outcome measures are specific to the profession. The goal of specialized and professional accreditation is to ensure entry-level competency of graduates for professional practice by collecting meaningful profession-appropriate outcomes measures. With input from the professional workforce and the public, specialized accreditors have the unique ability to set and assess quality measures within diverse institutions and regional environments. With advances in technology and research, accreditors revise data collection to ensure that it is meaningful in the assessments of program quality. Specialized accreditors consider a broad range of indicators consistent with the institutional mission, which may include licensure pass rates, externship evaluations, community-based projects, professional publication rates and juried performances, as appropriate.

Determination of the quality of a professional education program is more complex than what can be demonstrated by a single set of easily measurable quantitative indicators applied across all programs for all disciplines. Using only the types of measures currently under consideration by the USDE risks oversimplification and may mislead students and parents, for example:

- graduation rates must be understood within the context of the institution and program and the goals of the students;
- earning potential is not a measure of student competency or societal contribution – teachers, social workers and other professionals contribute greatly to society, but typically earn lower salaries;
- time to degree completion carries little meaning in full-time professional programs, particularly at the graduate level, as the length of programs vary, based on the profession; and
- employment rates must be considered in the context of the need for services provided by individuals in the specific professions, geography and prevailing economic conditions for the specific profession or discipline.

3. Professional judgment and peer review

Requirements for recognition should reflect the value of peer review in protecting the public interest.

Peer review is an essential component in setting and maintaining quality standards for the professions. Peer review in the accreditation process has been criticized by some – but review by experts in the field of study is fundamental in protecting the public interest. Peers in the profession – educators, practitioners and representatives from the profession – perform site visits, participate in the accreditation decision making process and contribute to the development and revision of standards. This has been a core value of accreditation practice since the early 20th century.

Peers are typically unpaid volunteers - and volunteerism is a critical professional investment to promote fundamental aspects of and best practices in the profession. Accreditors carefully vet reviewers to ensure that there not be a perception of a conflict of interest. All reviewers undergo intensive training to ensure that they consistently and carefully apply accreditation standards while bringing their own professional expertise to the process.

4. Public information

Requirements for recognition should reflect public access to information about the accreditation status of programs and student achievement that is relevant to the profession.

Students should have access to useful information. Institutions should publish, in plain language, and in an easily accessible location, the accreditations that the institution and its programs hold. Specialized and professional degree programs should similarly publish information about student success that is easily interpretable by the public and meaningful to the profession.

Useful public information varies among disciplines and should be determined by the profession in consultation with communities of interest and the public. A single definition of student achievement is not useful or meaningful to prospective students.

5. Specialized and institutional accreditation

Requirements for recognition should reflect the fundamental difference between specialized and institutional accreditation.

Specialized and institutional accreditors serve different purposes. In order to maintain the essential role of the specialized or professional accreditor and ensure protection of the public, it is important that regulatory language distinguish the separate roles of institutional and specialized and professional accreditation. There should be recognition of the reliance on institutional accreditors to make decisions regarding the overall stability and resources of an institution – and reliance on specialized accreditors to ensure that educational programs provide the public with qualified and competent practitioners who are educated to provide competent and professional service to members of the public and respond to evolution in professional practice.

About ASPA

A nonprofit association, ASPA provides a collaborative forum dedicated to assuring the quality of specialized and professional higher education programs and schools. It is the only unified, national voice that solely represents specialized and professional accrediting bodies in the United States. ASPA members set national educational standards for 100 different specialized disciplines and professions. They ensure students receive a quality higher education, consistent with standards for entry or advanced practice in a field or discipline. Through an emphasis on self-evaluation and peer review, accreditation plays an important role in continuous quality improvement in higher education.

In addition, ASPA:

- Facilitates collaboration among programs, institutions and accrediting organizations
- Promotes quality in higher education and accreditation through discussion, advocacy and educational offerings
- Encourages a focus on student learning and graduate competencies
- Advocates for the integrity, independence and autonomy of accrediting organizations and their affiliated institutions and programs

Each of ASPA's member organizations has a common commitment to uphold standards that are rigorous, comprehensive and outcome-based, with specific attention directed to the professional or special-purpose curriculum.



**Association of Specialized
and Professional Accreditors**
3304 North Broadway Street, #214
Chicago, IL 60657
Phone 773-857-7900

**For more information on ASPA
and our member organizations,
contact us at 773-857-7900 or
aspa@aspa-usa.org.**