

Partners for Transformation: Subcommittee on Relationship to the Triad and Beyond

May 24, 2018 – Conference Call

Focusing the Work

A core issue is the relevance of regional accreditation. Regional accreditation has three primary pillars, namely, compliance, quality assurance and quality improvement. Forces in the marketplace are increasingly driving higher education and its delivery. The market wants flexibility and speed of change that regional accreditation is challenged to provide procedurally and philosophically. In the past the marketplace valued what higher education does, but this is less and less true as alternative pathways to postsecondary education emerge.

While there may indeed be changes in the future for regional accreditation, the subcommittee is looking at the current relationships among regional accreditors, the U.S. Department of Education, state governments, and other accreditors. The subcommittee's work is to describe current relationships, identify barriers, determine indicators of successful partnerships, and develop recommendations for these relationships. What do we want/need the relationships to be in the future as post-secondary education evolves? What are the barriers to developing stronger relationships?

After meeting with several individuals during HLC's Annual Conference, Robert Stein developed the agenda for the meeting.

Relationship with U.S. Department of Education

While there is no representative of the U.S. Department of Education on the subcommittee, President Gellman-Danley shared that she had a wonderful discussion with the U.S. Department of Education individual who spoke to NACIQI. The individual shared that accreditation may be left alone during the next reauthorization of the Higher Education Act and that perhaps regional accreditors should be responsible for quality and the U.S. Department of Education for compliance. A future subcommittee discussion with the individual to explore these ideas may be possible.

Relationship with State Higher Education Governance Agencies

All state higher education agencies tend to be interested in defining program length (number of credit hours required for a degree), monitoring the financial health of the institutions they oversee, and, in many cases, limiting competition/redundancies among state institutions such as preventing two neighboring state institutions from offering the same programs (something HLC and U.S. Department of Education do not monitor).

While there are similarities among the interests of state higher education agencies, there are also many differences as evidenced in the varied state regulations and governance structures. This variance calls into question the limits of the term "Triad." Whereas two legs of this three-legged stool are consistent for all institutions within the HLC region, there really isn't just one more leg. There are 19 more legs, all of which are quite different, not only from the U.S. Department of Education leg and the HLC leg, but from each other as well. That makes it more difficult to describe what HLC's relationship with the states is and what it could be. At the present time, it's really not one relationship; it's more like 19 different relationships.

HLC has developed relationships with many of the state higher education governance agencies within the region, but that is not a standard process across all the regional agencies. A possible reason for the variance in the relationships is the high turnover of personnel in the state agencies but it may also be due to the responsibilities assigned to each state agency. Some states are very engaged with their institutions and others require minimal interaction. HLC asks institutions annually to disclose any adverse findings from the state or specialized accreditors but finds it difficult to get this information directly from the state agencies in a regularized process. This raises a communication question among the triad.

To develop better relationships with state agencies, perhaps there could be materials to orient new state agency staff to HLC. This might foster discussions between state and HLC personnel regarding the differences in expectations. For example, a state might approve of an institution offering a degree with 72 credits that does not include any general education, while HLC does not. It seems states are basically interested in the number of credit hours required for degrees. In other words, the interests of states and HLC differ.

During the call it was indicated that if institutions want to innovate, they feel comfortable contacting their state agency because they know who to call. They are also comfortable calling HLC about potential innovation because they know their liaison. Institutions are least comfortable contacting the U.S. Department of Education regarding their desire to experiment.

HLC uses the National Center for Higher Education Management Systems (NCHEMS) to determine states' governance authority for higher education (<http://nchems.org/projects/postsecondary-search/>). To provide more detailed information on each state's governance of higher education, perhaps SHEEOs could create a document describing the governance in each state.

Relationships with Specialized Accreditors

The possibility of developing a pilot project with a specialized accreditor was advanced.

Current HLC Policies and Practices

Key Policy Concepts

- Based on federal regulation and good practice, HLC uses information from other recognized accrediting agencies and from state agencies to improve its understanding of an institution it accredits or is considering for accreditation.
- HLC has reporting requirements related to actions other accrediting agencies and state higher education agencies take, and in some cases must provide information about its actions to the U.S. Department of Education.
- State authorization is a key prerequisite for accreditation; Eligibility Requirement 2 anticipates institutions will maintain appropriate state authorization (Policy CRRT.A.10.010).
- HLC also follows up on information from licensing and other disciplinary, state-based credentialing agencies.

Process – Narrative Overview

HLC receives information about actions that other accrediting agencies and state higher education agencies take from several sources, including institutions, the agencies themselves, and the media. When HLC learns that a recognized accrediting agency or a state higher education agency has taken a probationary, adverse, show-cause, withdrawal, termination, revocation, denial, or

suspension action, HLC follows up with the institution to learn more about the action and the issues that led to the action. Based on materials from the agency and from the institution, HLC considers whether these issues appear related to the Criteria for Accreditation or whether the action may affect the institution's compliance with the Criteria for Accreditation. If so, appropriate monitoring or other follow-up is scheduled. In addition, HLC provides these materials to teams who are considering whether to award or reaffirm accreditation or candidacy. In cases where an agency has taken this type of action and HLC does award or reaffirm accreditation or candidacy, HLC must write to the U.S. Secretary of Education within 30 days of action to explain in writing why the action is appropriate.

Next Steps

Social Work (Robert has a contact) and community college-level nursing education were suggested as possible areas for a pilot project. Another possibility is contacting the executive director of the Association of Specialized and Professional Accreditors (ASPA) for discussions and for pilot project ideas.

After the conference call, Stephanie shared the following thoughts.

The subcommittee was encouraged to focus on two to four issues. For those issues, a) take stock of the current problems/issues/complexities; b) envision where we would like to go; c) identify barriers, if any, to getting to that better place; and d) make recommendations on next steps. The next steps might be things that we could do immediately, or they might be things that would need to be done in a second phase of work.

Some things that immediately resonated with me:

- Better understanding of similarities and differences between the states that can be used as a tool by peer reviewers from regional accreditors and specialized accreditors. I look forward to seeing the NCHEM's information from Zach.
- More consistent communication between states, regional accreditors, the federal government and specialized accreditors regarding actions or concerns we have with institutions (as William points out, different things may or may not bother different legs of the stool, but more data points are powerful, and we can "ignore" things that don't necessarily apply to our environment).
- More coordination between regional accreditors, specialized accreditors, states, and the U.S. Department of Education to allow institutions to "experiment" in safe spaces and not worry about running afoul of one or another of us. I think there is a great deal of trepidation on campuses when it comes to what is allowed and what is not because sometimes the messages from the different entities are not coordinated.
- More coordination of approvals (new programs, new sites, new delivery modes) so that institutions aren't spending time preparing 3 different requests and preparing for 3 different reviews, when we (HLC, state, professional accreditors) are often asking for similar information. This can go from a range of 1) we share materials and do joint visits but maintain complete autonomy in decision making to 2) we trust each other to make judgments and then accept those judgments as our own.

Also, after the conference call, Robert Stein reported on his contact with a member of the Council on Social Work Education Commission.

I am writing to provide you with a summary of my call with Francis Origanti from Avila University in Kansas City. His wealth of experience as a peer reviewer for HLC, a member of the Council on Social Work Education, and as Chair of Social Sciences at Avila were a perfect combination for us to explore ways to increase efficiencies in the work of accrediting agencies from the perspective of institutions without jeopardizing an individual accreditor's responsibilities and authority. The conversation we had was both informative and exciting.

As a result of our conversation we generated the following list of areas to explore that would shed further light on potential collaboration between regional and specialized accreditors.

- Overall similarities and differences between processes, criteria, and standards used for accreditation
- Processes and standards used for actions related to substantive change requests
- Overlap in public advocacy agendas
- Perceptions about the accuracy and appropriateness of generalizations about an institution made from reports based on sample data about programs and student performance
- State-level information valuable to all accreditors, e.g., policies on faculty load and assignment, faculty qualifications to teach dual credit courses, assessment of general education and in the discipline, transfer policies

Francis is doing follow up communication with full-time personnel at the Council on Social Work Education, who have expressed interest in continuing discussions on the topic of potential collaborative initiatives. To make sure there is full understanding about the nature and limitation of our work as members of HLC's Partners in Transformation group, I made it clear we are in a very preliminary stage of exploring what enhanced partnerships in the Triad and Beyond might look like as we develop a draft thought paper for HLC review. Bottom line is I am confident that there is an understanding on the part of Francis and his colleagues at the Council on Social Work Education that these conversations are extremely valuable in generating ideas about opportunities for collaborative work.

Questions?

Please contact luminaproject@hlcommission.org.

Participants

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