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# Accreditation and Student Learning Outcomes: Perspectives from Accrediting Organizations

CHEA/CIQG Publication Series

**CHEA** Council for  
Higher Education  
Accreditation  
CHEA International Quality Group **CIQG**

## **ABOUT CHEA**

The Council for Higher Education Accreditation (CHEA) serves its member institutions through its advocacy for the value and independence of accreditation, its rigorous and demanding standards for the effectiveness of U.S. accrediting organizations, its service as an authority and repository of actionable research shaping the future of accreditation and quality assurance and its leadership and commitment to quality in higher education nationally and internationally.

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NORC at the University of Chicago is an independent research organization that delivers reliable data and rigorous analysis to guide critical programmatic, business, and policy decisions. Since 1941, NORC has conducted groundbreaking studies, created and applied innovative methods and tools, and advanced principles of scientific integrity and collaboration. NORC conducts research in five main areas: Economics, Markets, and the Workforce; Education, Training, and Learning; Global Development; Health and Well-Being; and Society, Media, and Public Affairs.

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# Foreword from CHEA

This research describes self-reported perspectives of recognized institutional and programmatic accrediting organizations in the United States on student learning outcomes, an issue central to their future credibility and effectiveness. Conducted for the Council for Higher Education Accreditation (CHEA) by NORC at the University of Chicago in 2018, the survey is a continuation of CHEA's longstanding commitment to support, encourage and lead greater capacity-building in developing and using evidence of student learning as it plays a larger role in judging academic quality.

Several key points emerge. Accrediting organizations report that they have invested considerable time in addressing student learning outcomes through accreditation standards, policies, accreditation visits and training. They have focused many of these efforts on accreditation processes: creating, applying and revising standards and policies, expanding formal guidance to address student learning outcomes and obtaining feedback from institutions and programs. Accreditors also identify student learning outcomes as playing a significant role in their formal actions (e.g., award or deny accreditation), although this role is not always determinative. Accreditors also believe that the majority of their programs and institutions are providing adequate evidence of student achievement and that the quality of this evidence has improved. Accreditors indicate some concern that the external review of the quality and effectiveness of their organizations, through CHEA or the U.S. Department of Education (USDE), may move them away from their preferred approaches to assessing student learning outcomes.

The national conversation about accreditation during the past several years includes strong signals that accreditors need to take significant additional steps to make evidence of student learning central to judgments about academic quality and accredited status. There is a growing body of evidence that a considerable percentage of the public, government and media may not find

accredited status to be a credible indicator that institutions and programs are serving and protecting students well. Additionally, leaders in both political parties, in an effort to safeguard students and the federal student aid investment, have asserted a need for greater federal regulation and oversight.

To continue to respond to these challenges, accreditors can take additional steps beyond the impressive work described here to provide additional evidence and transparency about student learning outcomes: what students learn, student success with regard to achieving stated educational goals, completion of degrees and other credentials, successful transfer of credit, successful job acquisition, longer-term advancement and earnings. The future credibility and effectiveness of accreditation is likely dependent on such action, preferably led by the accreditation and academic communities:

## **Evidence of Student Learning**

Further emphasize and make public what accreditors consider as robust and reliable evidence of student learning outcomes.

## **Acceptable Levels of Student Success**

Identify and make public explicit levels of success with regard to student learning outcomes for institutions and programs, contingent on mission and student population, as a central requirement to obtain and maintain accredited status.

## **Expeditious Action to Counter Substandard Performance**

Develop and apply means to identify and act expeditiously on institutions and programs with substandard performance in relation to student achievement, as defined by the accreditor and its institutions and programs.

## **Timely Action to Improve Performance**

For institutions and programs that need to improve their performance but are not considered substandard with regard to student learning outcomes, assure that improvement takes place in a timely way in order that students are not harmed.

# Introduction

This report presents findings from a 2018 survey, CHEA Survey of Accrediting Organizations, administered by NORC at the University of Chicago (NORC), an independent research organization, on behalf of the Council for Higher Education Accreditation (CHEA). The purpose was to gather insights from accrediting organizations about their recent experiences in two areas: 1) student learning outcomes and 2) innovation in accreditation. The findings from the survey are being distributed via this research report focused on accreditor practices associated with student learning outcomes and via a companion report on innovation in accreditation.

## **This paper examines accreditor perspectives on four broad topics related to student learning outcomes:**

1. How are accreditors currently addressing student learning outcomes?
2. What has been the impact of accreditation standards and policies on the evidence of student achievement?
3. Is the evidence of student achievement affecting the accreditation status of institutions and programs?
4. What is working, needs improvement and provides concern among accreditors about student achievement?

## **Operational Definitions Related to the Research**

For the purpose of this research, the survey instructed respondents to consider the terms “student learning outcomes” and “student achievement,” used interchangeably throughout, to refer to the knowledge, skills and abilities that a student has attained as a result of engagement in a particular set of higher education experiences.

- U.S. recognized institutional and programmatic accrediting organizations report that they have made a considerable investment and have produced impressive results in addressing student learning outcomes in higher education institutions and programs.
- Accreditors tell us that the primary focus of their attention to student learning outcomes has been centered on their processes, standards, training and communication with their member institutions and programs.
- Accreditors indicate a strong interest in further work on student learning outcomes —seeking to continue to address this vital issue to serve students and society.
- CHEA is focused on further assisting all recognized accrediting organizations through efforts to establish additional evidence to the public of what counts as student learning, to further articulate acceptable levels of student success to achieve accredited status, to further examine and act to counter substandard performance if found in accredited institutions and programs and to take even more timely action to improve performance in all accredited institutions and programs.

# Background on Accreditation and Student Learning Outcomes

Attention to student achievement in higher education accreditation has intensified in recent years, but is not a new phenomenon. In 1989, the USDE began requiring accrediting organizations to address student learning outcomes as a condition for recognition, and by 1989, half of all states required public institutions to assess and publicly report on student learning. By the mid-1990s, most accrediting organizations were examining student achievement in the institutions and programs they authorized, though their approaches, levels of engagement and terminology varied widely.<sup>1</sup>

CHEA, which was formed in 1996, began focusing on the role of accreditation in addressing student achievement with the publication of the 2001 report, *Accreditation and Student Learning Outcomes: A Proposed Point of Departure*. In 2006, CHEA introduced its *Award for Outstanding Institutional Progress in Student Learning Outcomes*,<sup>2</sup> which annually recognized outstanding practices in developing and applying evidence of student learning outcomes as part of the ongoing accountability and improvement of college and university programs of study. CHEA continues its focus on student learning outcomes through research and policy analysis, convening meetings and other national and international efforts to identify solutions and build consensus around advancing student achievement.

In commissioning this research, CHEA wanted to reach out directly to recognized accreditors in both the programmatic and institutional domains to gather insights from those who have been involved in the ever-evolving efforts to demonstrate and document evidence of student achievement in accreditation. The candid and unattributed survey responses provide insights into how

student achievement is currently fitting into the quality assurance system across U.S. higher education.

## Research Methods

NORC at the University of Chicago invited the combined pool of 86 CHEA- and USDE-recognized accrediting organizations to participate in a self-administered web survey between July 10 and August 13, 2018.

- Sixty-four out of 86 accreditors responded to the survey for an overall response rate of 74 percent.
- Thirteen out of 19 institutional accreditors responded (68 percent). Institutional accreditors included five regional, five national career-related and three national faith-related accrediting organizations.
- Fifty-one out of 67 programmatic or specialized accreditors responded (76 percent).
- Data on accrediting organizations published in the *CHEA Almanac Online*<sup>3</sup> indicate that accreditors who responded to the survey represent more than 6,000 institutions and more than 22,000 specialized programs.
- To ensure participant confidentiality, NORC was responsible for sending all survey invitations and follow-up emails. Communications emphasized NORC's nonbiased role in collecting and analyzing the data on behalf of CHEA. The link between the survey URL and the participant list was maintained on NORC's secure servers and was not disclosed to CHEA staff.

# Findings

## Part 1: How Are Accreditors Currently Addressing Student Learning Outcomes?

The survey probed accreditors on their current standards and policies that address student learning outcomes and achievement. The responses offered important insights about accreditor approaches, encompassing standards, official policies and other guidance as well as changes undertaken in recent years.

### Accreditation Approaches Are Informed by Many Factors

Institutional and programmatic accreditors cited a number of factors as important to informing their approaches to examining student learning and achievement (Exhibit 1). Every institutional accreditor reported that feedback from the institutions they serve is a very or extremely important factor in their approach to examining student achievement; 92 percent indicated that recognition requirements, federal policy and students and their families are also very or extremely

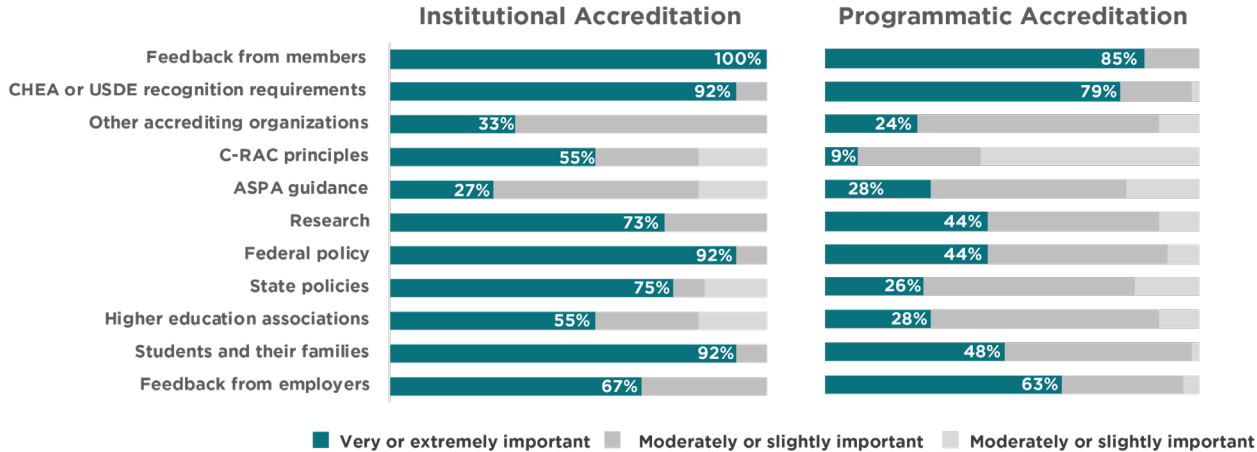
important factors. Programmatic accreditors cited feedback from member programs (85 percent), recognition requirements (79 percent) and feedback from employers (63 percent) most frequently as being extremely or very important factors for informing their organization’s approach.

### Emphasis on Student Achievement Varies in Accreditation Standards, Policies and Guidance

Eighty-two percent of institutional accreditors reported that accreditation standards explicitly addressing student learning outcomes or student achievement account for roughly a quarter or less of their accreditation standards. In contrast, standards addressing student achievement generally make up a larger share of programmatic accreditation requirements, with 43 percent of programmatic accreditors indicating they represent a quarter or less and 57 percent indicating that they represent more than a quarter of all accreditation standards (Exhibit 2). Each accreditor determined the proportion of its standards that address student achievement.

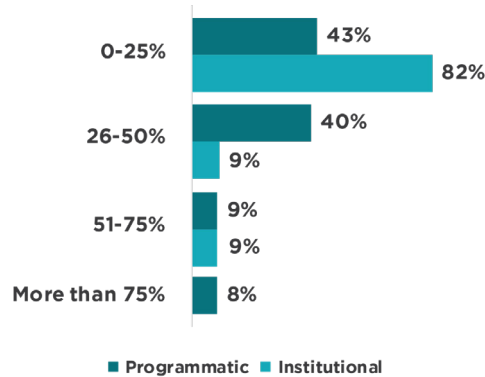
In addition to accreditation standards, a substantial majority of accreditors – 83 percent of institutional accreditors and 71 percent of programmatic accreditors – also hold their institutions and programs

**Exhibit 1. Rate the following in terms of importance for informing your organization’s approach to student learning outcomes or student achievement and accreditation**



accountable for policies or other guidance related to student learning outcomes or student achievement.

**Exhibit 2. Roughly what share of your organization’s accreditation standards explicitly address student learning outcomes or student achievement?**

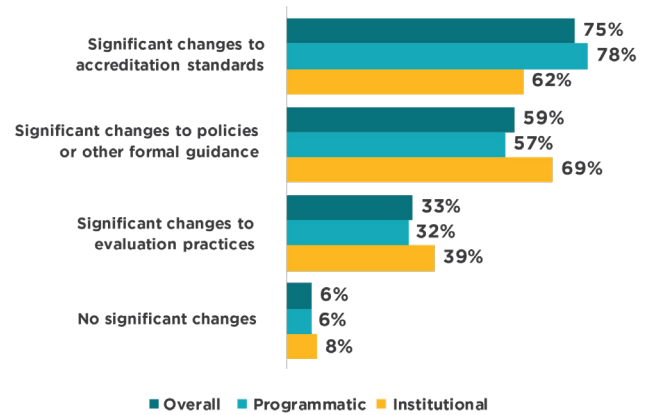


### Accreditors Continue to Refine Approaches to Finding Evidence of Student Achievement

Most accrediting organizations reported making significant changes in their approaches to examining student achievement in the last five years. Seventy-five percent of accreditors made significant changes to standards, 59 percent changed policies or other official guidance and 33 percent changed their evaluation practices (Exhibit 3). Each accretion determined what counts as a “significant change” in this context.

Most institutional accreditors made significant changes to standards in order to clarify their intent (88 percent) or to respond to feedback from institutions (63 percent). Institutional accreditors also changed their policies and guidance on student achievement mainly to clarify their intent (89 percent), to improve the rigor of their institution’s approaches (78 percent), to simplify or consolidate policies (67 percent) and to respond to USDE or CHEA recognition requirements (67 percent). Programmatic accreditors reported making significant changes to standards largely to clarify intent (75 percent), improve rigor (65 percent), simplify (65 percent) and foster transparency (60 percent).

**Exhibit 3. Has your organization made significant changes to standards, policies, other formal guidance or evaluation practices related to student learning outcomes or student achievement in the last five years?**

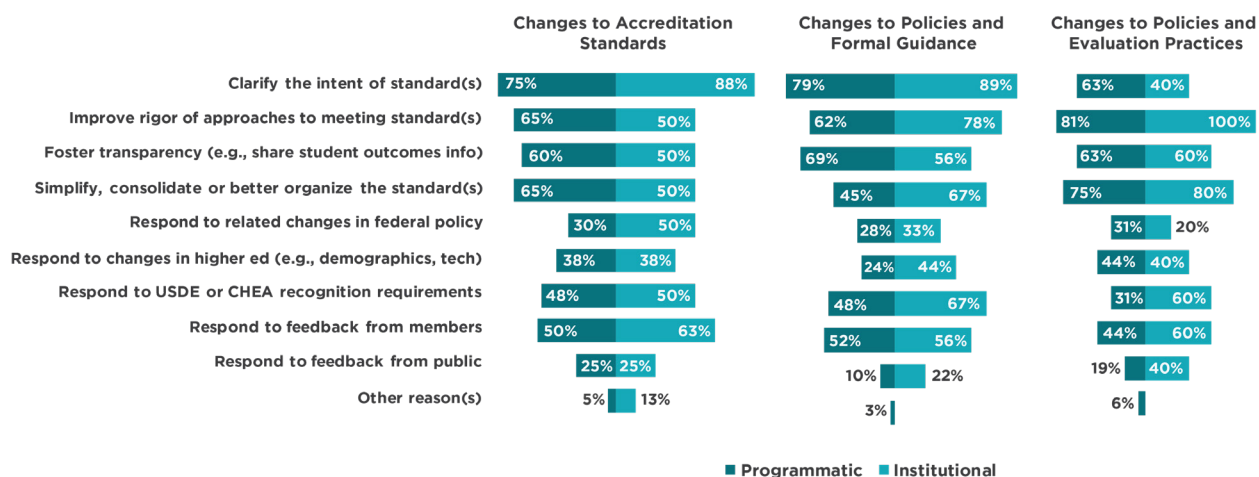


Programmatic accreditors also made significant policy changes to clarify intent (79 percent), foster transparency (69 percent) and improve the rigor of their programs’ approaches (62 percent).

Both institutional and programmatic accreditors made significant changes to their evaluation practices to improve the rigor with which institutions and programs provide evidence of student achievement, as well as to simplify, consolidate or better organize their student achievement approaches (Exhibit 4).



**Exhibit 4. For what reasons did your organization make significant recent changes to accreditation standards, policies, other formal guidance or evaluation practices related to student learning outcomes or student achievement in the last five years? (Applies only to accreditors that reported making significant changes, as depicted in Exhibit 3)**



## Part 2: What Has Been the Impact of Accreditation Standards and Policies on the Evidence of Student Achievement?

The survey asked accreditors about the extent to which institutions and programs are providing evidence of student learning as required in the accreditation process. Questions addressed common sources of evidence of student achievement and sources that are encouraged or discouraged by the accretor, perceived quality of the evidence,

whether accreditors prescribe thresholds established either by the accretor or institution/program for any of their indicators of student achievement and public availability of evidence of student learning outcomes and achievement provided by institutions and programs.

### Institutions Use Multiple Sources of Evidence of Student Learning

The survey asked accreditors to rank the sources most often used by their institutions or programs as evidence of student learning and achievement. Exhibit 5 shows a summary of top-ranked sources: Programmatic

**Exhibit 5. What sources do your institutions or programs most often cite as evidence of student learning outcomes and achievement? (Chart shows the absolute number of accreditors that ranked each source 1st or 2nd from a list of choices)**

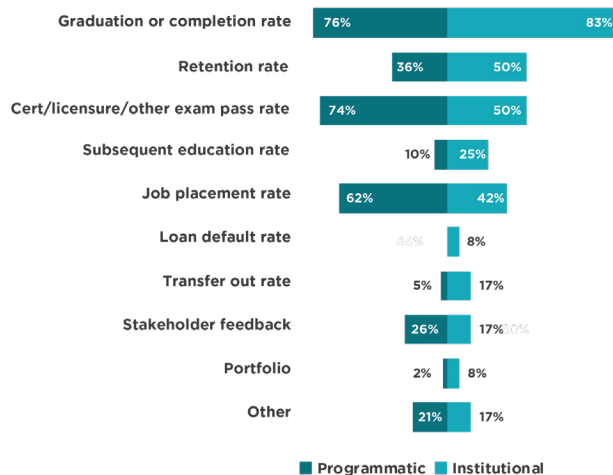
	Programmatic	Institutional
National student surveys (e.g., NSSE, CIRP, CCSSE, etc.)	3	5
Standardized exams, including certification and licensure exams (e.g., ETS Major Field Tests, Collegiate Learning Assessment+, Praxis, etc.)	28	2
Internally developed student surveys	10	2
Internally developed exams	10	0
Graduation or retention rates	19	7
Job and graduate school placement rates	16	4
Student portfolios	9	2
Course grades	4	1

accreditors largely ranked standardized exams, graduation or retention rates and job/further education placement rates among the top sources of evidence, while institutional accreditors ranked graduation rates, national student surveys (e.g., National Survey of Student Engagement) and job/further education placement rates as the sources of evidence most often cited by their institutions.

### Most Accreditors Encourage Specific Indicators as Evidence of Student Learning Outcomes and Achievement

In addition, 92 percent of institutional and 89 percent of programmatic accreditors responding to the survey indicated they require or encourage specific indicators as evidence of student learning or achievement. Exhibit 6 shows that the most common indicators they encourage or require from their institutions and programs are graduation/completion rates, certification/licensure or other standardized exam passing rates and job placement rates.

**Exhibit 6. Please list the indicators that your institutions or programs are required or encouraged to use as evidence of student learning or achievement.**



Furthermore, 15 percent of institutional and 23 percent of programmatic accreditors reported that they explicitly discourage or prohibit particular sources of evidence as part of the accreditation review process. Course grades and indirect measures like

student satisfaction were the most commonly cited sources of discouraged or prohibited evidence.

### Nearly Half of Accreditors Use Performance Thresholds

The survey asked accrediting organizations whether they require institutions and programs to meet bright-line student learning outcomes in the context of quantitative performance thresholds for particular indicators related to accreditation. Most programmatic accreditors require programs to meet thresholds either set by the accreditors (54 percent) or set by programs themselves (23 percent). These thresholds are often associated with indicators such as certification or licensure exam passing rates and graduation or completion rates. This finding is consistent with a 2016 report<sup>4</sup> by the Association of Specialized and Professional Accreditors (ASPA) that found 52 percent of ASPA members had bright-line outcomes requirements.

In comparison, 46 percent of institutional accreditors reported setting bright line performance requirements, while eight percent require institutions to set their own threshold requirements. This likely is a reflection of the USDE requirement for for-profit institutions, accredited by career-related national accreditors, to meet gainful employment standards based on the student debt-to-earnings ratio.

### Accreditors Report Majority of Institutions Provide Adequate Evidence of Student Learning and that Quality of Evidence Has Improved

Accreditors were asked to estimate the percentage of their institutions and programs that provide “adequate evidence of student learning outcomes and achievement” in the accreditation review process, consistent with accretor standards, policies and guidance. According to the accrediting organizations surveyed, the vast majority of institutions and programs currently provide

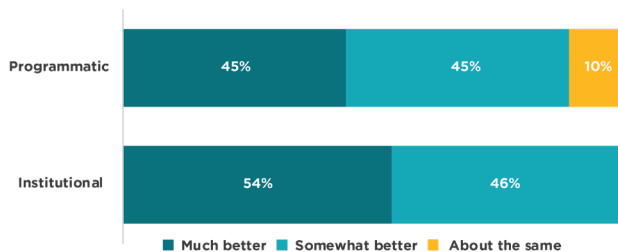
**Exhibit 7. Roughly what share of your members provide adequate evidence of student learning outcomes and achievement in the accreditation review process?**

Approximate percentage of members providing adequate evidence	Accreditors responding	
	Programmatic	Institutional
76 - 100%	74%	54%
51 - 75%	24%	46%
26 - 50%	2%	0%
0 - 25%	0%	0%

adequate evidence of student learning outcomes (Exhibit 7). Nearly three-quarters of programmatic accreditors and a little more than half of institutional accreditors indicated 76 percent to 100 percent of their programs and institutions provide adequate evidence. However, a quarter of programmatic accreditors and nearly half of institutional accreditors reported that just 51 percent to 75 percent of their programs and institutions provide adequate evidence of student learning, indicating there is room for further development.

Accreditors were also asked their perception about whether the overall quality of student outcomes evidence was better or worse than compared to five years ago. Exhibit 8 shows that 90 percent of programmatic accreditors and all of institutional accreditors reported that the quality of evidence has gotten much or somewhat better over the past five years, and none reported that the quality of evidence has become worse. Each accreditor determined what counts as “overall quality.”

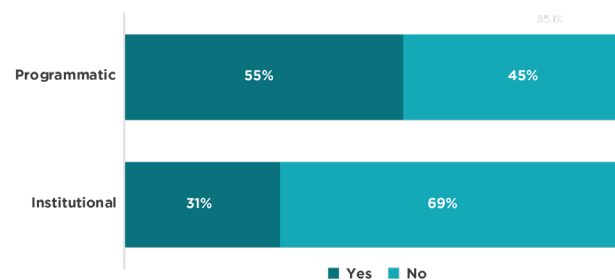
**Exhibit 8. To what extent has the overall quality of evidence of learning and achievement that your institutions or programs provide through the accreditation process changed over the past five years?**



**Institutions, Programs and Accreditors Are Making Evidence of Student Learning Outcomes Available to the Public**

Evidence of student learning and achievement that institutions and programs provide for accreditation is often shared with the public through websites, press releases and other publications. Nearly 80 percent of programmatic accreditors and two-thirds of institutional accreditors reported that 76 percent to 100 percent of their programs or institutions publish student learning and achievement outcomes (Exhibit 10). Moreover, the majority (55 percent) of programmatic and nearly a third of institutional accrediting organizations themselves publish evidence of student achievement provided by their programs and institutions (Exhibit 9).

**Exhibit 9. Does your accrediting organization make evidence of student learning or achievement from your member institutions or programs publicly available (e.g., on your website, in publications or in press releases)?**



**Exhibit 10. Roughly what share of your institutions or programs make evidence of student learning or achievement publicly available (e.g., on the institution's or program's website, in publications or in press releases)?**

Approximate percentage of members publishing evidence	Accreditors responding	
	Programmatic	Institutional
76 - 100%	78%	67%
51 - 75%	4%	17%
26 - 50%	7%	17%
1 - 25%	9%	0%
0%	2%	0%

### Accreditors Offer Support to Institutions and Programs Through Training and Resources Related to Evidence of Student Achievement

Most of the accrediting organizations that responded to the survey offer resources to assist their members in addressing accreditation requirements related to student learning outcomes and achievement. While 29 percent of programmatic accreditors indicated that they do not offer formal training, 100 percent of institutional accreditors and the remaining 71 percent of programmatic accreditors offer training specifically related to student learning outcomes and achievement at least once per year, with some offering training several times per year. In fact, accreditors offer a selection of resources related to student achievement, as illustrated in Exhibit 11. Institutional accreditors primarily offer in-person workshops and special sessions both during (92 percent) and outside of (77 percent) annual meetings, as well as supplementary informational materials (77 percent) and

informal guidance as needed (77 percent). Programmatic accreditors primarily offer informal guidance as needed (85 percent), supplementary materials (69 percent) and workshops at annual meetings (65 percent).

### Part 3: Is the Evidence of Student Achievement Affecting the Accreditation Status of Institutions and Programs?

The survey examined what happens when accreditors determine that evidence of student achievement provided by institutions and programs does not satisfy requirements, including accretor perspectives about the extent to which student learning outcomes are considered in accreditation actions.

As part of their reviews of institutions and programs for academic quality, accrediting organizations take formal actions to grant, reaffirm, defer, deny or withdraw

**Exhibit 11. Which of the following resources do you offer member institutions or programs to assist them in addressing accreditation requirements related to student learning outcomes and achievement?**



accreditation. They also issue show cause or probation orders. Accrediting organizations' definitions of these terms may vary; nevertheless, CHEA annually compiles data on these actions from information published on individual accreditor websites in the *CHEA Almanac Online*.<sup>5</sup> Exhibit 12 provides CHEA's definitions of formal accreditation actions. Exhibit 13 presents 2017 *Almanac Online* data, applying CHEA's definitions of formal actions

to information obtained from the websites of accrediting organizations. These data illustrate that a substantial majority of formal accreditation actions reaffirm or grant accreditation status, with relatively few sanctions issued in a given year. For example, 1,059 out of 1,751 (60 percent) institutional and 3,098 out of 3,627 (84 percent) programmatic accreditation actions reaffirmed or granted

**Exhibit 12. CHEA definitions of formal actions taken by accrediting organizations based on whether institutions and programs demonstrate that accreditation requirements are met.**

<b>Grant Accreditation</b>	A decision to award an initial accreditation status when an institution or program demonstrates that accreditation requirements are met.
<b>Defer Accreditation</b>	A decision to postpone action on a program or institution until receipt of additional information that shows accreditation requirements are met as specified by the accreditor.
<b>Reaffirm Accreditation</b>	A decision to continue accreditation when an institution or program demonstrates that accreditation requirements are met.
<b>Notice/Warning</b>	A determination that although one or more accreditation requirements have not been met, the institution has the capacity to make appropriate improvements within a reasonable period of time and fully meet the accreditation standards for the long term.
<b>Show Cause</b>	A determination that accreditation requirements have not been met and the accreditor mandates corrective action to resolve one or more deficiencies within a specified period of time. Show Cause actions may be made public by the accreditor.
<b>Probation</b>	A determination that accreditation requirements have not been met and the accreditor mandates corrective action to resolve one or more deficiencies within a specified period of time. Probation actions may be made public by the accreditor.
<b>Deny Accreditation</b>	A determination that an institution or program does not demonstrate it can meet accreditation requirements and is denied a grant of initial accreditation. Accreditors permit the appeal of this decision.
<b>Withdraw Accreditation</b>	A determination that an institution or program is unable to demonstrate it can meet specified accreditation requirements and is removed from accredited status by the accreditor. Accreditors permit the appeal of this decision.

**Exhibit 13. Summary of formal accreditation actions in 2017, by organization type.**

Accreditation Action	Institutional			Programmatic	Totals
	Regional	National faith-related	National career-related		
Grant accreditation	10	16	117	1,079	1,222
Reaffirm accreditation	339	38	539	2,019	2,935
Deny accreditation	0	0	27	4	31
Withdraw accreditation	0	2	187	144	333
Defer accreditation	0	1	88	204	293
Notice/warning	34	1	160	59	254
Show cause	4	2	99	4	109
Probation	22	3	62	114	201
Appeals	0	0	0	0	0
<b>Totals</b>	<b>409</b>	<b>63</b>	<b>1,279</b>	<b>3,627</b>	<b>5,378</b>

NOTES: Data compiled from individual accreditor websites. The terms used to describe formal actions are based on CHEA’s definitions (Exhibit 12).

Source: CHEA Almanac Online

initial accreditation status in 2017 (Exhibit 13). Critics of accreditation have interpreted statistics like these (i.e., low sanction rates) to suggest that accreditors are “watchdogs that rarely bite”<sup>6</sup> or that they “need higher standards”<sup>7</sup> for overseeing low-performing institutions and programs. A 2015 report of the U.S. Government Accountability Office (GAO) found that accreditors most frequently issued sanctions for failure to meet standards related to financial capability rather than student achievement and that schools with stronger student outcomes were as likely to be sanctioned by accreditors as schools with weaker student outcomes.<sup>8</sup> In 2016, the National Advisory Committee on Institutional Quality and Integrity, which advises USDE on accreditation issues, piloted “accreditor dashboards” for more systematic, outcomes-focused reviews of accreditors based on their institutions’ student outcomes data, such as graduation rates, earnings and loan default rates.<sup>9</sup>

providing effective oversight of academically struggling institutions.<sup>10</sup>

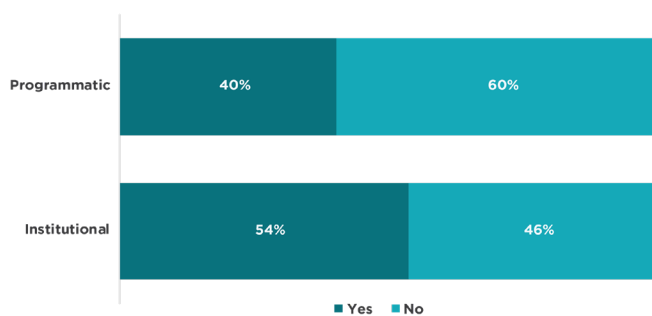
As attention to student outcomes and accreditation actions has increased in recent years, most of the focus has been on the formal actions in Exhibit 13. However, accrediting organizations also provide oversight of institutions and programs that fall short of student achievement requirements in ways that do not involve formal sanctions. Other accreditor actions might include requiring monitoring reports on student learning outcomes, interim reports or site visits addressing certain standards or reaffirming accreditation for a shorter amount of time. And unlike the accreditation actions listed in Exhibit 13, these actions are not considered sanctions and are not typically disclosed to the public. It is difficult to determine the scope and frequency of such actions or to compare them across accrediting organizations.

Accreditors responded with efforts like the Council of Regional Accrediting Commission’s Graduation Rate Information Project, which explored strategies for identifying and

## Accreditation Actions Consider Failure to Provide Adequate Evidence of Student Learning Outcomes and Achievement

Nineteen percent of programmatic and 23 percent of institutional accreditors reported that more than half of their informal and formal accreditation actions in 2017 were in part due to inadequate evidence of student achievement. Thirty-eight percent of programmatic and 54 percent of institutional accreditors indicated that a quarter or fewer of their informal and formal accreditation actions were partly due to problems with demonstrating evidence of student achievement, suggesting that the plurality of actions are still based at least in part on factors other than student achievement. Focusing specifically on removal or denial of accreditation status over a longer period of time, 40 percent of programmatic and 54 percent of institutional accreditors responded that they had taken such an action in the last five years due in part to problems associated with evidence of student achievement (Exhibit 14).

**Exhibit 14. In the past five years, have any of your institutions or programs lost or been denied accreditation due, at least partially, to problems with evidence of student learning or achievement?**



## Part 4: What Is Working, Needs Improvement and Causes Concern Among Accreditors About Student Achievement?

The survey asked accreditors to reflect on student outcomes and accreditation along three specific dimensions – what is working, what needs improvement and what most concerns accreditors about the future.

### What Is Working?

In describing what they felt was working well, both institutional and programmatic accreditors highlighted training, coaching and workshops they provide as well as the detailed guidance and clear expectations they provide. Institutional accreditors repeatedly noted that their review processes and evaluation strategies are also working well, while programmatic accreditors emphasized that flexibility in defining student outcomes and publishing student achievement metrics on accretor and/or program websites are working well. Exhibit 15 shares illustrative comments from respondents.

### What Needs Improvement?

In describing what needs improvement with respect to how accreditors incorporate student achievement into the accreditation process, both institutional and programmatic accreditors frequently mentioned the need to improve the quality of measures used to demonstrate evidence of student learning and achievement. Respondents underscored the challenges of institutional and program diversity and recognition requirements from CHEA and the USDE. Some pointed to perceived tensions between the use of qualitative “student learning” and quantitative “student achievement.” Institutional accreditors also noted the need for clearer expectations, more detailed guidance, strategies for sharing best practices and more training, both internally and for constituent

**Exhibit 15: What is Working, What Needs Improvement, What Concerns Accreditors About the Future: Illustrative comments from Institutional and Programmatic Accreditors**

Institutional Accreditors	Programmatic Accreditors
<b>What is working?</b>	
<p>Increased attention to Student Learning Outcomes (SLOs), including at the program, degree and institutional levels. Training of institutional assessment leaders to expand and integrate effective use of outcome data into review and improvement across campuses.</p> <p>Institution-Set Standards (ISS) are an aspect of each comprehensive review. Teams evaluate the process used to set these standards and the data sets by which their achievement is determined. This has prompted many beneficial conversations that have kept a focus on student achievement.</p>	<p>Validating student achievement metrics and posting them on our website and then requiring programs to have a link on their website to the outcomes we publish.</p> <p>Standardizing the request of data so upon receipt of the program's information, we can compare apples to apples—which ultimately will provide us with a baseline for setting specific benchmarks that the commission deems reasonable and relevant.</p>
<b>What needs improvement?</b>	
<p>We found it essential to distinguish between SLOs—based on qualitative measures, assigned by faculty, unique to programs and institutions, thus not comparable among members; and Student Achievement (graduation, retention, transfer, persistence)—thus quantitative, captured by the Institutional Research (IR) Department. This was essential in terms of expectations for using disaggregated data to watch for gaps in demographic student populations.</p> <p>Our current strategic plan has a large component on Student Success and we are updating our criteria. We have a big national think tank of higher education innovators also looking at these issues.</p>	<p>Would be extremely helpful if CHEA and ASPA specified the data they feel most impactful so that...we can all compare apples to apples. Now, every accreditor “assumes” what they believe to be relevant. However, what we think is relevant, may not be to someone else.</p> <p>Trying to balance the requirements for tracking and reporting numerical outcomes (such as certification exam pass rates) with more descriptive outcomes (such as impact of the program and graduates on the community) is difficult. Our process for reviewing programs that do not meet benchmarks is new and still a little clunky.</p>
<b>What concerns you the most about the future?</b>	
<p>Greatest concern is that student achievement will be established without regard for the student population served and the level of collegiate preparation held when enrolling. Also, that the drive to raise graduation rates will actually exclude First-generation college students and those socio-economic groups who are under prepared and under-served by higher education.</p> <p>That the focus will be primarily on outcomes that do not relate directly to student learning. For example, federal policy has pushed hard in the last few years almost exclusively on retention rates, graduation rates, student debt amounts, loan default rates and placement in positions with significant salaries. None of those measures directly address student learning, and most are focused more on economic or financial benefits, which is not a priority for the theological schools that our agency accredits.</p>	<p>Standardization. That programs will end up coming out of “cookie cutters” to meet some standardized performance that does not factor in the unique character and needs of the communities. That this will quench what has been our profession’s strongest suit—education innovation.</p> <p>Forcing accreditors to release more information or forcing accreditors to require institutions to release more information will not serve students better or help protect the public. The USDE or CHEA becoming more prescriptive on this matter is a significant concern. Already there has been significant variability and inconsistency in the ways in which the USDE and CHEA have reviewed and cited...accrediting agencies on matters such as student achievement and transparency. Not once has a prospective student called our offices because they weren’t sure whether to enroll in an institution because of the completion rate, the employment rate or the pass rates.</p>



institutions. Programmatic accreditors also cited training and information sharing needs as well as more consistency and better review processes. Many programmatic accreditors mentioned that they are currently monitoring or evaluating their approaches to student outcomes and accreditation to identify potential areas for improvement.

## What Concerns Accreditors Most?

In expressing what concerns them most about the future of student learning outcomes and accreditation, institutional and programmatic accreditors were nearly unanimous in their concern about the trend toward standardized “cookie cutter” definitions and approaches as well as the use of “blunt” measures without regard for the rich heterogeneity of the missions, cultures and student populations of institutions and programs. Several institutional accreditors expressed concerns that such a shift will reduce access and stifle innovation in higher education. Programmatic accreditors also raised concerns that overemphasis on rigid or prescriptive student achievement requirements, which may not actually reflect learning, will ultimately diminish attention to other meaningful aspects of students’ education experiences. Both accreditor types mentioned concerns about external pressures from USDE and CHEA, data collection and management and keeping pace with rapid changes in higher education, such as education delivery modalities.

## Conclusions and Implications

The 64 recognized accrediting organizations that participated in this survey offered important perspectives about how they are addressing student learning outcomes. The self-reported insights suggest that there has been significant evolution in the role that accreditors play in encouraging the use and improvement of evidence of student achievement and learning outcomes through the accreditation process in recent years.

### Key takeaways on how accreditors reported they are currently addressing student learning outcomes included:

- Accrediting organizations address student achievement through standards, policies and formal guidance.
- Programmatic accreditors reported that student achievement-related standards represent a larger percentage of their overall standards, on average, than institutional accreditors reported.
- Institutional accreditors’ approaches to student achievement are largely informed by feedback from institutions, recognition requirements, federal policy and students and families. Programmatic accreditors largely consider feedback from programs, recognition requirements and feedback from employers.
- Nearly all accreditors reported making significant changes in recent years to standards, policies and guidance and evaluation practices related to student achievement. Many of these changes were made to clarify intent, improve the rigor of institution and program approaches, foster transparency, simplify requirements and respond to feedback from institutions and programs.

A majority of the respondents reported a two-way communication with institutions and programs to incorporate and refine the sources of evidence of student achievement and how they are integrated into the accreditation process. Additionally, accreditors expressed that the voluntary, peer-led and mission-driven—rather than prescriptive—nature of accreditation generally yields adequate evidence of student achievement from institutions and programs.

### Key takeaways on what accreditors reported with respect to the impact of accreditation standards and policies on the evidence of student achievement included:

- Most accreditors encourage or require specific indicators of achievement such as graduation and completion rates; passing rates for certification,

licensure, or other standardized exams; and job placement rates. These are also the sources of evidence most cited by institutions and programs. A smaller share of accreditors prohibit or discourage particular sources of outcomes evidence, such as grades and indirect measures like student satisfaction.

- Roughly half of accreditors (54 percent of programmatic, 46 percent of institutional) set bright-line quantitative threshold requirements for at least one student outcomes indicator. Twenty-three percent of programmatic and eight percent of institutional accreditors require members to set their own threshold requirements.
- The majority of accreditors feel like their institutions and programs currently provide adequate evidence of student achievement for accreditation purposes and that the quality of evidence has improved in the last five years.
- Most accreditors provide formal training along with a selection of other resources to assist members in examining student learning and achievement.
- A large share of both programmatic and institutional respondents reported that they have revoked or denied accreditation due at least in part to problems with evidence of student achievement. Additional research to clarify whether the gap is in actual achievement or in a lack of adequate data would be helpful so that appropriate supports could be developed.

**Key takeaways on how accreditors perceive the evidence of student achievement affecting the accreditation status of institutions and programs included:**

- Forty percent of programmatic and 46 percent of institutional accreditors reported that more than a quarter of their actions in 2017 were in part related to problems with demonstrating evidence of student achievement.
- Forty percent of programmatic and 54 percent of institutional accreditors

reported that programs and institutions lost or were denied initial accreditation status in the last five years due in part to problems with demonstrating evidence of student achievement.

The increased capacity, engagement and alignment of accreditors on the issue of student achievement should not be minimized. At the same time, there is room for further rigor in how accreditors work with institutions and programs to ensure meaningful information and insights about actual student learning and success.

**Key takeaways from accreditors on what is working, needs improvement and causes concern among accreditors about student achievement included:**

- Accreditors reported that training, coaching and workshops along with detailed guidance and clear expectations are working well. Institutional accreditors also emphasized their review processes and evaluation strategies, while programmatic accreditors emphasized flexibility in defining student outcomes and publishing student achievement metrics as working well.
- Institutional and programmatic accreditors cited the need to improve the quality of measures used to demonstrate evidence of student learning and achievement—underscoring the challenge of balancing quantitative and qualitative measures, institutional/program diversity and recognition requirements from CHEA and USDE, and perceived tensions between “student learning” and “student achievement.”
- Accreditors expressed near unanimous concern about the trend toward standardized “cookie cutter” definitions and approaches as well as the use of “blunt” measures without regard for the rich heterogeneity of the missions, cultures and student populations of institutions and programs.

The results from this survey speak largely to the processes accreditors employ rather

than to whether these processes are yielding meaningful information and insights about actual student learning and success. Accreditors need to continue to determine and make public what constitutes robust evidence of student achievement in different settings and develop publicly shared means for identifying and improving—or sanctioning—substandard performance in relation to student achievement.

## Research and Future Steps

With a commitment to advancing evidence and transparency about student learning outcomes, CHEA is positioned to work with constituents to further strengthen the role of accreditation in appropriately capturing and improving student learning outcomes as an integral component of educational quality. CHEA will do so through further research and convening that complements its work in the recognition of accrediting organizations, with the USDE and in advocacy that balances accountability and transparency with heterogeneity of mission and academic independence.

More concretely, CHEA's research efforts will align with key standards in its 2019 *Recognition Policy and Procedures* that it holds accreditors to for recognition: 1) promotes academic quality and advances student achievement and 2) demonstrates public accountability for performance and transparency. CHEA's research will be intentional and focused on supporting the ongoing areas of challenge and opportunity for accreditors, including demonstrating positive impact on student achievement.

Below are examples of the types of questions CHEA may examine or encourage via roundtables, quantitative inquiries, interviews and case studies.

### Evidence of Student Learning

Accreditors report improved clarity as well as rigor of standards and evidence provided by programs and institutions. What can we deduce about how these changes have

affected actual student learning outcomes, comparing today's student outcomes data to historical data?

### Acceptable Levels of Student Success

There is concern among accreditors about over-standardization of measures of student learning outcomes, yet the public demands greater transparency. How can accreditors develop student learning expectations that identify acceptable levels of success in different circumstances—without setting one-size-fits-all bright lines—that can serve as a foundation upon which institutions and programs can layer mission-specific evidence of student achievement?

### Expedient Action to Counter Substandard Performance

Accreditors and peer review are uniquely situated to drive continual improvement across diverse institutions of higher education. What tools and practices can the community develop to foster greater transparency, clarity and timeliness around actions to assist institutions and programs with substandard student achievement?

### Timely Action to Improve Performance

One underlying expectation of transparency is that it will promote efforts to improve student outcomes. With greater sharing, what models can be replicated for institutions and programs that are not deemed substandard, but are seeking to improve their performance? How can accreditors ensure any changes do not have unintended harmful impacts?

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