**Dr. Belle Wheelan, President of Southern Association of Colleges and Schools Commission on Colleges**

**U.S. Senate Committee on Health, Education, Labor and Pensions**

**Questions for the Record**

**April 25, 2019**

**Senator Doug Jones’ Questions:**

1. There are 101 accredited Historically Black Colleges and Universities (HBCUs) in our country who have historically been accredited by the Southern Association of Colleges and Schools Commission on Colleges. Unfortunately, if you speak with the Presidents of these institutions, they will tell you stories of perceived additional barriers to maintain accreditation compared to their higher-resourced, non-HBCU peers. For instances, you might hear one of the following:
* The peer review process allows too many personal biases to enter the process and have negative impacts, especially for small, low-resourced institutions.
* True “peers” that reflect an institution’s size, locale, sector, resources and outcomes generally do not comprise the majority of a campus review team, compromising the accuracy and integrity of the review team’s findings.
* Standards are applied without consideration of institutional size, scope, programmatic offerings, resources, endowments, etc. requiring institutions with minimal resources to be evaluated using the same criteria as some of the best endowed institutions in the country. Weighting of standards should be employed to provide equity for lower-resourced institutions.
* Accreditors tend to shift what is required of institutions on sanction, much like what happened to Bennett College, leading to a belief that when institutions reach a state of extreme difficulty in meeting the standards, the accreditor would rather remove them from membership instead of providing them with any additional opportunity to rectify their problems.
* The degrees of progress are not taken into account when an institution has been on sanction for two years. For example, an institution can go from 10 sanctions to one in two years, demonstrating substantial progress, yet that one lone sanction can be enough to remove them from membership and rescind their ability to award federal financial aid without another accreditor in place.

Given this information, can you please share your views of SACSCOC relationship with HBCUs and how the agency considers the under-resourced nature of these institutions when making accrediting decision? Does SACSCOC apply the exact same standard to all institutions accredited by the organizations and approach every institution the same or does it take various approaches depending on institutional size and endowment levels?

**RESPONSE:**

 SACSCOC has one set of *Principles of Accreditation* or standards that are approved by the membership and used to evaluate quality at all of its 794- member institutions; however, each institution is evaluated according to its mission and purpose irrespective of institutional size or level of endowment. When an institution has been non-compliant with standards and enters a monitoring period, they must then become compliant within two years. Many times, this monitoring is accompanied by a sanction for being out of compliance with certain standards, many of them financial. Once an institution’s monitoring period has expired, federal laws require that we must drop them from membership. Every institution we have dropped has had at least three years notice that it is in danger of being dropped from SACSCOC membership. Each correspondence to the institution includes an explanation of the possible ramifications of continued non-compliance. Not one of them were caught off guard about this possibility.

 Since I became President of SACSCOC almost 15 years ago, we have instituted training and education sessions for small and private institutions and all HBCUs. Prior to my arrival, very few of the HBCU presidents or their staff members were involved in the peer review process or as members of the SACSCOC Board, so they were not familiar with the interpretation of the standards by peer reviewers. Nor were they familiar with ways in which to demonstrate compliance. Since my arrival, however, we have assisted many of our institutions, including HBCUs, from losing membership, helped them reduce the amount of time they were on sanction, and increased the number of Board members from HBCUs on our governing board.

 In the case of Bennett College, they were dropped from membership because they could not demonstrate financial stability and, even after raising $10 million dollars did not demonstrate how they were going to be able to meet their financial obligations past the current fiscal year. Additionally, this was not the first time they had been in this situation with us.

 HBCUs, particularly private ones, have several challenges that impact their finances; (1) they have an extremely high tuition discount rate which leaves them extremely dependent on student enrollment and Pell grant revenue; (2) the number of African American students between 18 and 21 years of age is dwindling, making their enrollments decline; (3) they have small or no endowments on which to cushion financial setbacks; and (4) they are resistant to ‘right-sizing’ their institutions by laying off staff and culling academic programs. You can’t continue to do business the same today as you did previously when you had a captured market, and yet, many are still trying to do so.

 We have no standard that dictates how much money or how many programs an institution must maintain. We do expect them to live within their means; whatever that means for their particular institution. When they can’t or won’t do that, they are likely to lose their accreditation.

Accrediting agencies work hard and are quite successful at balancing the need to apply standards and policies equitably to all institutions, as well as the need to care for and protect students while also caring for a given institution’s mission, identity, context and future. These are sometimes competing goals; however, peer evaluators, staff and Commissioners work carefully to accomplish all three. While there is subjectivity and discernment in all evaluation work, our evaluators and Commissioners do an excellent job of attempting to maintain appropriate objectivity while attending to mission, identity and context.

 It is simply untrue that our preference would be to remove a challenged institution from membership than to work with them for quality improvement. Frankly, it has been Congress, DOE and NACIQI that has pressured accreditors to have more bite and to impose more severe sanctions on struggling institutions. This has been done in an attempt to design a “one-size-fits-all” set of regulations to address issues in other areas of higher education.

**Senator Bernard Sanders’ Questions:**

1. As you know, Secretary DeVos has delayed implementation of the Obama Administration’s accountability regulations to provide additional transparency, protect student borrowers and taxpayers and establish a more robust system to measure the success of students attending institutions of higher education. Specifically, the “gainful employment” rule was supposed to ensure that for-profit colleges and universities provide students with the education skills required to be successful in the workplace. In the meantime, students continue to spend money and time on education/training programs that do not lead to “gainful employment” or a valuable degree or certificate. Based on your experience as an accreditor and in the field of higher education, what else can Congress do to help you better regulate the practices of for-profit institutions to protect students from predatory tactics?

**RESPONSE**

* + We believe we have very rigorous processes by which to evaluate all of our institutions and our for-profit institutions have been able to demonstrate compliance with our standards.
	+ You and other members have also pushed for expanding the current “90-10” rule so that these institutions would be required to demonstrate that an even higher amount of funds are coming from non-federal sources and that such sources also begin to include those derived from Veterans GI education benefits. Such approaches are worthy of consideration.
1. Inequities continue to exist in nearly every aspect of our nation’s higher education system. More often than not, students who are least likely to complete a college program after enrolling are often given the least amount of support and resources. What else can Congress do to help you create a better accountability system that extends beyond standardized performance-based funding and one that also considers racial and ethnic diversity, income stratification, family history and varying institutional missions? More specifically, how can we recraft federal accountability policies to ensure that schools are dedicating federal resources and funds to students (and schools) who require the most assistance?

**RESPONSE**

* + Some ideas that come to mind include: Increasing the amount of Pell grants so that fewer loans would be needed and continue to allow them to be used year round; and tweak federal work-study so more on-campus programs can be funded at institutions that serve high risk students and in the students’ program of study.

**Senator Tim Scott’s Questions:**

1. When we talk about accountability in higher education, I think it’s important to say, from the outset, that we all recognize and agree that there are certain bad actors in every sector—and that some institutions, regardless of mission or tax status—are not serving their students well. At the same time, when I look at South Carolina, I also see incredible institutions across sectors—institutions that are constantly innovating and doing all that they can to meet the needs of students from all walks of life. And I think my skepticism of a top-down, one-size-fits-all accountability framework comes partially from the fact that any time Washington tries to impose rigid metrics and attaches penalties to them, the “solution” tends to be worse than the problem. And in this case, the students who suffer are more than likely to be folks from underserved backgrounds, and people of color, and people looking for a second chance.
	1. From my perspective, we should be expanding access and options—not limiting them. And I don’t think we, as Congress, are particularly equipped to define what a valuable program is, and what isn’t. Rather than penalizing institutions for—frankly—enrolling a disproportionate share of lower-income students, we need to do more on the front-end to help these students access high-quality opportunities. That’s why I joined Sen. Cassidy and two of our Democratic colleagues in leading the College Transparency Act—a bill that will make students and families more informed and empowered consumers, who can better identify which educational opportunities are the best fit for them. Along those lines, for the whole panel, where do you see the biggest gaps in data and information on student outcomes and program quality right now—and what steps could Congress take to best fill those gaps?

**RESPONSE:**

Without question, the biggest gap on data is graduation rates, for reasons with which you are well aware. Your legislation, if enacted, would help address this issue by ensuring data on the College Scorecard and other federal websites paint a far more accurate picture of this critical measure, especially taking into account the mobility of students from one institution to another.

1. Now, let’s say that we do develop and publish better data—how do we make sure this information gets in the hands of the students and families who need it—and in a meaningful way?

**RESPONSE:**

 Many prospective students are already accessing federal data on the College Scorecard, as well as through third-party college and career software programs used in many schools. In addition, if you look up an institution on Google (where most 18-year olds are most likely to get their information!) three data points show up: cost, graduation rate, and acceptance rate—all data from the U.S. Department of Education, and at least with respect to graduation rates, data that all too often paints an inaccurate picture of an institution’s quality.

 I believe getting data into the hands of students is less of a challenge than ensuring students know how to use the data and are able to interpret the data in order to make sensible choices as to which institution or program they should enroll. While many proposed changes to the Higher Education Act have addressed the importance of students receiving sufficient counseling related to their student loans, there has been very little discussion around the counseling students need to interpret data to make the types of decisions that will actually help them pay off their loans.

 More work needs to be done to bring in high schools and groups representing secondary education, such as chief state school officers, superintendents, principals, counselor groups as well as parents and teacher groups, all of which have a role to play in making sure that prospective students know how to leverage this data to make smart and informed decisions.

**Senator Elizabeth Warren’s Questions:**

1. What are the weaknesses in America's system of higher education accreditation?

**RESPONSE:**

 No system is perfect, and our nation’s system of accreditation is no exception. However, I believe that there are far more perceived weaknesses in accreditation than actual weaknesses. For example, some perceive our peer review process as the “fox watching the hen house,” while in fact, peers are best suited for recognizing when an institution is not meeting quality standards and are diligent in holding their peers accountable.

 Our system is not perfect in part because of the realities inherent in our complex system of high education which often forces us to continually balance issues such as allowing for innovation while not allowing institutions to expose undo risk to students, or the trade-off of stepping in at the right time to prevent a fragile institution from collapsing versus protecting students.

 If there is a better way to eliminate these challenges as part of an alternative system of accreditation, I have yet to hear about it. While not perfect, I do believe our current accreditation system is best suited to handle the many trade-offs that are inherent in our nation’s postsecondary education system.

1. Is higher education accreditation serving students and taxpayers? If yes, how so? If no, what could be done better?

**RESPONSE:**

 Higher education accreditation does serve students and taxpayers as, in the words of the Higher Education Act, a reliable authority as to the quality of education. The United States arguably has the most robust, mission-sensitive quality assurance system in the world. Mission sensitivity, along with understanding the student body of the institution is essential, given that the U.S. also has the most diverse, trustworthy set of institutions in the world.

1. You testified that you do not believe accreditors should be compelled to implement "bright line" outcomes metrics to maintain accreditation because the data on metrics like graduation rate are flawed.
	* Do you support the College Transparency Act, which would remedy the flawed data you mentioned in your testimony?

**RESPONSE:**

 I do support the College Transparency Act, though I am concerned about the privacy of students’ information.

* + Assuming Congress passed legislation (like the College Transparency Act) to fully remedy the data issues you cited in your testimony, why would "bright line" outcomes metrics based on those data not then be appropriate to impose on colleges and universities seeking to maintain accreditation?

**RESPONSE:**

 Having data that better reflects the true outcomes of institutions and ideally, programs, is essential but not enough to justify ‘bright lines.’ There are simply too many factors that play into this data being able to paint a full picture of the overall quality of an institution. But this data can and must be used to send a strong signal to institutions.

1. In your view, is there a graduation rate that is too low to maintain accreditation (assuming the rate is accurate)? If so, what is that rate?

**RESPONSE:**

 This is a fair question and an issue which SACSCOC and the other regional accreditors have spent a great deal of time examining. In particular, last year, we released a report in which we examined all of the institutions within our respective regions which had an IPEDS graduation rate of less than half the national average in order to learn more about these institutions including whom they were serving and how the data reflected their overall quality.

 What we found is that in fact, a single data point such as a graduation rate is never sufficient to determine the overall quality of an institution. Some institutions which are facing serious issues may actually have a graduation rate that, on the surface, is fine, while other high performing institutions may have a graduation rate that is extremely low, but upon future examination, such rate fails to include a vast majority of the institution’s student population because they are not first-time, full-time students and, therefore, not included in IPEDS data. There are also institutions where a high percentage of students transfer into other institutions and, therefore, show up as a failure in terms of graduate rates to the institution from which they transferred.

 Accreditors are and must be more nuanced in how they look at institutions; however, that is not to say that we shouldn’t look at an institution that has a low graduation rate, or for that matter, any institution that is experiencing a sudden growth or decline in enrollment, or other factors that can trigger a need for us to take a closer look at the institution.

1. In a 2015 WSJ article, when asked if a college with a 10% graduation rate can do a good job, you said: “It can be a good school for those 10% who graduate.” Do you still believe this is true? Should a school with a 10% graduation rate maintain accreditation and access to Title IV funding, retaining the ability to put students into debt?

**RESPONSE:**

 As noted above, it is possible that a school with a very low graduation rate has a very high transfer rate or a rate that fails to reflect a vast majority of the students it serves. So, yes, it is possible that an institution with a 10% graduation rate can do a good job based upon other factors.

1. Should the Department of Education publish aggregate outcomes data, such as graduation rates or cohort default rates, by accreditor?

**RESPONSE:**

 Under the prior administration, NACIQI developed a ‘dash board’ report for each accreditor which included aggregated outcome data (See <https://www.ed.gov/accreditation> ). In large part, particularly with respect to regional accreditors, the data reflected the types of institution accredited as opposed to the relative quality of institutions. For example, ACCJC, which accredits two-year institutions, has a vastly different set of outcomes than WSCUC which accredits four-year institutions.

 It is worth noting that the Department publishes annual data, broken down by accreditor, on dozens of factors ranging from graduation rate to percentage of student receiving Pell grants. These data may be found at <https://www.ed.gov/accreditation> .

1. In light of accreditation's failures to hold predatory institutions accountable, why should Congress continue to allow accrediting agencies to be gatekeepers to federal student aid dollars?

**RESPONSE:**

 Accreditors play an invaluable role in serving as gatekeepers to federal student aid and should continue to serve in this function. Predatory institutions should not be eligible to participate in federal student aid programs period; however, Congress is best suited to define what constitutes such institutions along the lines of the current definition of ‘diploma mill’ under the Higher Education Act.

1. In your view, what is the difference between institutions that can't improve without additional resources and institutions that won't improve?

**RESPONSE:**

 I believe the peer review system of accreditation is one of the only ways to really make this distinction on a case-by-case basis and to recognize when there is an institution that simply will not improve. These are the types of institutions most likely to face sanctions and ultimately, have their accreditation withdrawn.

 I also believe there are very few institutions which don’t try each and every day to improve the educational outcomes for their students; however, it is clear that some institutions face far more barriers, such as old facilities, outdated programs, and boards and alumni groups that don’t want to change, and are unlikely to improve dramatically without additional resources.

 Oftentimes, these institutions serve students who are already struggling to keep up with the cost of attending college, so increasing tuition is rarely an option to meet these resource needs. These institutions often rely on the limited funds available from the State or programs under the Higher Education Act which are aimed at strengthening institutions. Any reauthorization of HEA should look at the extent to which these programs are meeting the needs of all institutions they are intended to serve.