Summary of Testimony before the
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For nearly 15 years, I have served as President of the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), one of seven recognized regional accrediting agencies in the nation.

I will provide an overview on how SACSCOC functions as a gatekeeper to federal funds and how our accredited institutions are held accountable for academic quality which in turn protects the investments of students, parents and taxpayers. SACSCOC's role in the "triad" is to oversee and ensure the quality of education at each of the institutions we accredit. Process in short: Once eligible for consideration to be accredited, an institution must apply for candidacy, which involves demonstrating through a compliance certification to the Commission they meet each of our standards. If an institution makes it through this stage and becomes accredited, they continue to be held accountable – for e.g. if the Commission has reason to believe an institution is no longer meeting standards (consistent with those required under HEA), the institution is asked to demonstrate how it plans to come into compliance through a monitoring report. If after two such reports compliance is not demonstrated, they are placed on either Warning or Probation, or have its accreditation withdrawn (more in full remarks).

It has been proposed by some that as part of the next reauthorization of the Higher Education Act, the Federal government, either directly or through accreditors, should impose "bright lines" for institutional outcomes. Unfortunately, it is not that simple. Last year, The Council of Regional Accrediting Commission (C-RAC), in which SACSCOC is a member, issued a one- year review of the Graduation Rate project which had been initiated the prior year. A key finding was that 75 percent of these "low-grad" institutions had at least a majority of their students not reflected in the federal data given they did not enter the institutions as first-term, full-time students. The point here is not just that federal graduation rates are often incomplete (an issue Congress is working to tackle), but also the fact that "bright line" graduation rates would invariably not capture the many ways graduation rates can be approached.

Although I oppose the concept of federal bright lines for accountability, I strongly believe accreditors can and must hold institutions accountable for outcomes, such as graduation rates. In fact, that is exactly the direction all regional accreditors, including SACSCOC, are headed:

- SACSCOC takes a close look at institutional outcome metrics including – enrollment, completion rates, cohort default rates, retention/withdrawal rates, transfer-out rates, loan repayment rates, as well as median earnings.
- Under SACSCOC's newly adopted standards, we require every institution to identify a key student completion indicator from the following completion metrics to serve as their "baseline performance level": (1) "Traditional" IPEDS overall graduation rate (within 150% time); (2) "New" IPEDS Outcome Measure (8-year award rate), or (3) National Student Clearinghouse "total" completion rate (6 years).
- SACSCOC asks each of our institutions to select institutions they considered to be their peers and provide them with outcomes data from these peers, so they are able to better evaluate their performance against similarly situated institutions.
- SACSCOC requires every institution to develop a Quality Enhancement Plan (QEP) and SACSCOC standards also hold institutions accountable for collecting and using evaluation data to inform planning and improvement efforts.