

ACTA
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Demystifying Accreditation with Third Way

Christine: You're listening to Higher Ed Now, ACTA's podcast on issues in higher education. I'm your host, Christine Ravold. The last time Congress reauthorized the Higher Education Act, or HEA, was in 2008. In 2015, the Senate Health, Education, Labor and Pensions Committee, otherwise known as HELP, conducted hearings as they considered reauthorizing this important piece of legislation. Essential concern in the last attempt to reauthorize the HEA was quality assurance as politicians and experts had accreditations role in higher education landscape. But in late December, the House Committee on Education and the Workforce released a long awaited new bill, the Promoting Real Opportunity, Success and Prosperity Through Education Reform, or PROSPER Act. This was important first step but it didn't quite address accreditation as fully as some may of hoped. We'll drill down into this important, if often overlooked, issue.

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This week, we welcome Michael Itzkowitz, Senior Higher Education Policy Advisor of Third Way, a centrist tank based in Washington, D.C. Michael, welcome.

Michael Itzkowitz: Thank you so much.

Christine: And ACTA President, Michael Poliakoff, is also here to join in our discussion today.

Michael Poliakoff: I love my job but one of the things that I really love is being on Higher Ed Now.

Christine: Well, we're glad to have you back, Michael. So for those you who might be less interested or familiar with Higher Education policy, could one of you two take the wheel and explain what accreditation is and why it is so important.

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Michael Itzkowitz: Sure. Accreditation started about fifty years ago as a lot of folks were coming back from the war and GI Bill funds were steadily flowing to institutions to help our veterans who were coming home obtain education. Now at the same time with this massive influx of folks coming home in federal dollars going towards institutions, some producing very poor results, the federal government thought that this was an opportunity to step in and provide quality assurance to make sure that our students are getting the education that they need, that they deserve and that our federal tax dollars are being used well. So they looked to the accreditation system as a system that was already in place, a voluntary system, who would come in and help provide a level of assurance to folks who were entering higher education to provide a seal of approval, essentially a stamp of approval, so that when students look at these different institutions, they could be assured of some minimal level of quality assurance in addition to the continuous improvement that accreditors had provided for years and years before that.

So sixty-five years later, we still have the accreditation system in place in addition to a couple of other quality assurance metrics, and it also serves as a gatekeeper role. In order to, for an institution, to be able to receive federal Title IV-A dollars, these are dollars that come in the form of grants and loans, they need to be an accredited institution. For students, it's a stamp of approval and, for taxpayers, it also serves as a gatekeeping function to make sure that our dollars are going to institutions that are serving students well.

Michael Poliakoff: Michael has really indicated the two polarities, one might say, of the accreditation system as we have it. One is a much older system of peer improvement, peer advice that helps move institutions forward, a time-honored tradition within higher education. And then a relatively new phenomenon, which

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is that of being the gatekeeper for the flow of the enormous amount of federal funding that flows in through the Higher Education Act.

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Christine: You've given us your understanding of it. I have here how the Department of Education describes Accreditation In Brief. It's an important signal to students, families and the Department about whether a school offers a quality education. What is your reaction to that?

Michael Itzkowitz: When I look at this statement, I often start thinking about student outcomes. Part of my job for the past couple of years was working as the Director of the College Scorecard at the Department of Education. We put together a tremendous amount of data on the graduation rates, how students are doing in school and also after they attend school, post-enrollment earnings. We also like to look at the percentage of students who earn more than the average high school graduate as one possible metric as well as loan repayment rates, which means the percentage of students that are able to pay down at least one dollar on their loan principle after they attend an institution and take out loans. What we can see is that there are hundreds and hundreds of institutions that continue to have very poor performance on these three metrics in addition to other metrics, yet they also remain fully accredited often. While there are also fantastic institutions that remain accredited, there remain this other tier of institutions that have gone through the system and we continue to accredit them even though their outcomes suggest that they aren't serving students and in being a steward of taxpayer dollars in the way that we would like them to be.

Michael Poliakoff: The idea that any accredited institution is a institution of educational quality is indeed highly problematic, as Michael just said. It is indeed misleading to think of accreditation as necessarily a good housekeeping seal of approval. It's wrong to trace all of the problems of American higher education to

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accreditation, but it is a major issue for consumers, to say nothing of taxpayers, not to know in much more detail what we're getting for the enormous amount of money that this nation pours in to higher education, both public and private money. If we look at the OECD charts, we're at just about the very top for expenditure per pupil in higher education. It's the one place where we can really say, "We are number one."

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On the other hand, when the OECD, that's the Organization of Economic Cooperation and Development, compare the outcomes, the level of collegiate skills that graduates have, we're a little bit below the average. In our own survey instruments in this country, we see that in the most frightening terms. That's to say the two iterations of the National Assessment of Adult Literacy showed that most four-year college graduates—I stress that most—are not at the proficient level in verbal and quantitative skills. What is proficient, according to the National Assessment of Adult Literacy, the ability to compare and contrast two newspaper editorials or to compute the total cost of food when the price is given in "price per ounce." These are basic skills. Let's be real about this. This is, in fact, something that could reasonably be called sub-collegiate. But for the purpose of that survey, these were counted as proficiencies and most four-year college graduates were not reaching that level.

So as you were saying, Michael, we really do have a quality control problem, and if accreditation is our quality control system, we've got to do better. I'm not blaming accreditation for where we are. I am, however, concerned that we have a false sense of assurance from the accreditation system that we've got to be able to get past, get beyond. And I could add other things like Richard Arum and Josipa Roksa's *Academically Adrift*, the 2011 study, that showed that 36-percent of four-year college graduates had not shown significant learning gains, cognitive gains over those four expensive years. We have a real issue. How are we going to address it?

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Christine: Michael, I'm hearing two different things. As a function of consumer transparency, that it's not functioning that way. I visited an accreditor's website recently and all they have is a list of schools. So that's one problem I see. But we're also talking about assessment of proficiency in measures. What are they measuring then? Maybe one of the two Mikes knows.

Michael Itzkowitz: Michael was rightly talking about a lot of the core competencies that we want students to obtain within their different institutions that they attend, whether that be a four-year institution, a two-year institution, or a certificate training institution. I was approaching this from a little bit of a different angle looking at outcomes that are very much related to core competencies and having the correct level of preparedness after someone attends a college which, from wearing my taxpayer hat or from a consumer angle, we're thinking about "Are you graduating? Are you able to get a job that provides you with a modest living? And are you able to repay your loans?" Right now, the way that accreditation is set up through statute, it requires accreditors to go through a checklist of things. The way that they do define student achievement basically says that the creditors need to measure student achievement however we're not telling them what to measure and we're not telling them how to measure it. So as long as a school as a measurement process in place, that is often enough to remain a fully accredited institution. That being said, there are accreditors that are looking at job placement rates. There are accreditors that are looking at learning outcomes. There are accreditors that are looking at "are students moving to and move through school and getting good jobs afterwards?" But oftentimes, there are many that don't look at those things as well.

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Michael Poliakoff: I think we do need to give some credit to WASC, the Western Association that now does post all of its findings on its website.

Christine: It's a new development...

Michael Poliakoff: ...relatively new development and an important step towards transparency. I think we're seeing some movement within the accreditation community that is very positive. Is it enough? That's a key question that we need to dig into. I think as everyone knows, ACTA has been a firm proponent of nationally normed assessments of growth in core collegiate skills, instruments like the Collegiate Learning Assessment plus the Proficiency Profile, things that give both the public and the institution a clear measure of the Delta. How well are their students moving forward in core collegiate skills: writing, quantitative reasoning, critical thinking, analytical reading? There are instruments out there that give a very clear picture of whether the institution is doing its job, whether it really is serving as a generator of cognitive growth, a place where students acquire deeper skills. We need to use those instruments.

Michael Izkowitz: Yes, Christine. You mentioned a lot of accreditors aren't posting this information on their websites and that's another question of, you know, we have a lot of this information. What does the information tell us? Where should it be? And another question is: How accountable should accreditors be held for institutional outcomes in general? That's an ongoing conversation that we're all continuing to have and think about.

Christine You were talking a little bit about the financial measures because it's one of the few numeric ways that you can track how students are doing, is if they're paying on their loans, or if they're hitting a minimum threshold in life style. What about – there are going to be some majors and some students who do

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better than others, depending on what they study. Is there a control for these fluctuations?

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Michael Itzkowitz: I think there definitely can be and I think that there's also value in looking at hard statistics and thinking about how these institutions compare to other peer-like institutions that serve similar student populations. Ultimately, it doesn't matter if you're super low-income or high-income. If you got out of school and you can't get a job and you can't repay your loans, in general we could say that that's a poor outcome. Specifically, for a lot of the lower-income students that often attend these lower performing schools, they can actually end up in a situation where they're worse than actually before they entered the institution. So these are the things that are deeply troubling to me and that I think that we need to continue to keep an eye on. But we've done a lot of work in the college quality space over the past year and we've really been looking at statistics across the board just to say, "Where are we doing well? And where is there significant room for improvement?"

So looking at four-year institutions as one example, we know that roughly only one out of two students attend an institution where most of their students graduate. So the person sitting to my left, it's either me or him that are going to be the one who are going to be graduating from your typical four-year institution. Looking at two-year institutions, only about sixty percent of them actually have most of their students earning more than the typical high school graduate six years after they enroll, and we calculate that to be about twenty-five thousand dollars at the Department of Education. This is totally understanding that a lot of these are open access institutions. A lot of these students have other obstacles in their way, but this is a hard statistic that we can look at to say, "We may want to dig deeper into some of these institutions where less than a quarter of students are earning that much."

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Christine: Are those including remediation in the two years?

Michael Itzkowitz: It's six years after they enrolled in an institution. The other way, looking at certificate granting institutions, these are usually shorter programs, six- or nine-month programs where people go with the intent of getting a job and they often have to take out loans to be able to do that. But we can see at seventy-seven percent of them, the majority of students are unable to start even paying down one dollar on their loan principle within three years, and some of these institutions have less than ten or twenty-five percent of those students able to begin paying down their loans. So there's definitely room to understand what types of students these institutions are serving but there's also a space to think about a hard line to say, "Are we ultimately giving these students more opportunities after they attend an institution or not?"

Michael Poliakoff: I think it might be time to introduce another tool into this toolbox of things we can do to improve American higher education. Michael, I'm sure you're going to have some ideas about that, which is to set some bright lines coming from the federal government, which is, of course, the source through Title IV for the funding that students draw upon either as outright grants or as loans. We've saddled accreditors with this function and it doesn't sit well with their traditional, their birthright, function which is peer advice, peer review, the kind of interaction between institutions that provides them with ideas about best practices and can actually give a rating system independent of the very binary function: Is a school going to continue to have Title IV access or not? In other words, we need to be able to say to schools in a much more efficient way, "You're not fulfilling the function that taxpayers expect of you. And you may even be misleading students by making them think that by enrolling, by paying money, they're going to come out at the end in a much stronger position for a job. And

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also I would like to introduce into the conversation for informed engaged citizenship.”

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So we may need to envision a whole different structure of quality assurance, one in which accreditors, and there will undoubtedly be more that will come into the landscape, who can provide a voluntary certification much as used to be done in the past and perhaps even in tiers: excellent, good, very good, fair. But that that crucial decision of whether a school can continue to receive federal funding would rest with the federal government, which would set up some bright lines. Is that an idea that you could envision?

Michael Itzkowitz: Yes. That’s definitely something that’s been on the table and that we’ve been thinking about as well. Just to put this into a little bit of a bigger perspective as well, over the past year there’s been a tremendous amount of focus on accreditation. I think why there’s been such a big focus is because it’s come to even more light, and we’ve had even more clarity around a lot of our lack of using outcomes within higher ed accountability in general. So there are actually very little outcomes based policies that help control the flow of federal money to institutions of higher education. One of these examples is the cohort default rate. We’ve put this in place after the recession in the 1980s where a lot of students decided to go back to school to gain the skills that they needed to be prepared for the new economy when more jobs were able to open up. Just this year and last year, only ten schools failed the cohort default rate test. Out of those ten schools, for both years combined I think, I believe that they serve less than two-thousand students of our sixteen-million students nationwide. This is regardless of the outcomes that we just mentioned, some of them quite terrifying, across all of our institutions of higher education.

One of our other pieces of higher education accountability where they gained full employment regulations that were finalized in 2014. This is the first year that

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we've had data and, for those who aren't total higher ed wonks, the gainful employment regulations give a basic debt to earnings ratio that help ensure that students are earning a reasonable amount of money to adequately pay down their debt at a reasonable rate and get on with their lives afterwards. Now this year, eight-hundred and sixty-three schools' programs failed across the United States, however, the current administration is in the process of revisiting those schools and in all likelihood rolling back a lot of that accountability. So we really have other measures in place that are quite frankly ineffective or in the process of being rolled back, which is why we've been paying so much attention to accreditation lately as one of the remaining levers that we can use to make sure that they are giving a quality seal of approval.

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Now going back to your point, Michael, about bright lines, there's been some bills and talk recently that were introduced. Elizabeth Warren. Senator Durbin and Senator Schatz released an Accountability Bill—I think it was late 2016?

Michael Poliakoff: I think that's right but we'll have to check that date.

Michael Itzkowitz: Right. I think it was last year. One of the things that they did propose was to have the federal government and the Secretary help draw these lines. Now this could be the federal government drawing a minimum threshold that would limit institutions ability to collect Title IV aid if they didn't score above that certain threshold. It would probably give more space and room for accreditors to not focus on those institutions as much while also doing some differentiated accountability to other institutions within the space itself. So that sort of tackled both of those things. That being said, I think that there's a lot of room to help move that bill or a bill like that forward.

Michael Poliakoff: Another approach that I think has to be part of this equation is the transparency to consumers. Students who come from families that know the

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higher education world know what questions to ask. Their families know what questions to ask. They're going to look at graduation rates. They're going to ask about employment and average earnings. They may even dig, as ACTA would recommend, to issues of what's in the core curriculum. "Will my child graduate from this institution with the kinds of skills that will allow her or him to move in a very unforgiving dynamic job market?" Now that's not going to be true for many students. Many are going to come without a whole lot of understanding of this landscape of providers, good and not so good. One of the things that we have been considering is an alternate route to Title IV funding for an institution, which depends on the institution's audited notarized disclosure of key measures of quality and outcome. That, and of course, a clear demonstration of financial stability. And here's the really crucial thing. Clear audited demonstration of student learning gains using a variety of instruments being able to say, "If you come to my institution, we have an established witnessed demonstrated record of being able to move you from Point A to Point *whatever*."

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It is not hard to do this. The instruments are there. It's a question of will. I do like the idea of consumers being told very clearly in advance, for example, "First time, full time graduation rates are twenty-percent." Do the math. "If you're planning to graduate from this institution in four, five, or six years, you will be one out of five." Now perhaps there's a high transfer rate. Perhaps there are other mitigating circumstances, but get those out there in a clear form, no obfuscation, so that the public can make decisions of that nature. That is not going to exclude other tools in this toolbox. An accreditation from an accreditor that has a record of being very rigorous, that's also persuasive. We like to compare it to the Leads system. Leads has no financial hook to it but buildings do compete to have a platinum or gold Leads rating. I really would like to see institutions competing with accreditors who have differentiated standards for those kinds of recognition while, again, making sure that nobody's going to get essentially befuzzled by thinking that

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because an institution bears accreditation that it's necessarily one that help students learn, helps them get good careers.

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Christine: I hear you talking about changing the incentives for institutions with accreditation. One of the criticisms that we have levied in the past is that there are a lot of perverse incentives because the gatekeeping function and the peer review function mean that schools will eventually be reviewing other schools and trading off reviewers and that creates a little bit of conflict of interest. Would just decoupling the gatekeeping function affect that?

Michael Poliakoff: It would certainly be a very strong motivator of schools to look not so much at whether or not they're going to continue to have the Title IV funds, which for most institutions are a crucial part of their budget. But at whether they are, in the eyes of their peers, responsible providers of high quality education. It would free the accreditors to do what accreditors ought to be doing. Obviously, you're quite right in asking that question. It would be contrary to human nature for people on an accreditation team to wheel the ax and essentially pass a financial death sentence against an institution without thinking, "Mm, am I next?" So I'd rather see that function, which is not a function of quality improvement, but really an accountability function, go someplace out.

Michael Itzkowitz: Another conflict that has always raised some concern for me are just the way that the structures are set up in terms of accreditors are membership-based organizations. Therefore, if you are to not renew institutions of accreditations, ultimately you do lose dues. I've been assured that these are not the way that certain decisions are made and accreditors—this is not the way that they're going to factor in whether or not the school will get its accreditation renews or not, but it does have that sense of incentives that we think about,

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which is a larger conversation that we need to think if this is working or if there's another structure that we can put in place to better the system ultimately.

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Christine: We always advise trustees to avoid even the appearance of conflict of interests, so maybe it would just put everyone else more at ease.

Michael Poliakoff: Michael's raised a very, very important point about a membership organization compared to an independent organization. I will share an experience I had years ago and I won't say which regional accreditor it was.

Christine: Well, it was only one of six. [*Laughter.*]

Michael Poliakoff: I was pushing very hard for a requirement in the standards that all institutions as a prerequisite for accreditation among other things, that they insist upon students mastering written English. That every graduate leave with the ability to write accurately and fluently. We argued for a bit and finally the representative said, "Not all of my members would agree to that." I believe that we would all agree that it is a terrible malfeasance to take money from students for four or five or six years, or even in a two-year institution, without ensuring that they will leave with the ability to write an accurate and affective application letter, that they will embarrass themselves by writing in a way that would embarrass their employer. And yet this regional accreditor said, "No, we can't put that into the standards because not all of our members would agree." That is, indeed, a problem. I hope that this is being remedied across the board. But let's be very clear about this. When the Conference Board in 2006 surveyed almost 500 employers, twenty-six percent of them said that they found the writing skills of newly hired four-year college graduates "deficient." Something is very broken about the system. I would venture to say that virtually all of those graduates came out of accredited institutions. We need a better system of quality control.

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Christine: Michael, you were talking about how we have very few ways to evaluate outcomes but accreditors are doing a lot of evaluation of the financial health of institutions. During the Illinois budget crisis, accreditors emerged as an unlikely antagonist. They started putting schools on notice, not for their academic performance, but for their unstable financial health. During the budget crisis, many public institutions were struggling to make ends meet financially without their state funds. The irony is that many of these schools had been reporting single digit graduation rates for years but it wasn't until they were in financial trouble that accreditors stepped in.

Michael Itzkowitz: So there's been some discussion of what accreditors role should be in terms of judging the financial health of institutions. There are places within the Department of Education that help do this through FSA and there's also been some pushback from accreditors, I think, saying that this shouldn't be a primary responsibility and we do want to focus more on outcomes rather than some of these other things, including financials and inputs. I think that that's been a positive discussion where folks are heading, with some accreditors occluded to think about, "How can we get rid of some of these other things that we're required to focus on but don't necessarily have a direct correlation with student outcomes?" Get rid of some of these things while putting in statute and/or regulation, making it a requirement for accreditors to spend more of their time and resources on student outcomes and looking at improvement and continue peer review, but continuing to think about using outcomes as one of their main focuses. Ultimately right now, the statute doesn't require that so this is something that we would need to go through and change with a new HEA Reauthorization to give them more time and space to be able to do that.

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Michael Poliakoff: This is again one of the reasons why ACTA is so interested in an alternate route to Title IV. Accreditation visits can be as infrequent as every ten years. A lot changes in ten years. If annually schools had to audit and post their key outcomes, and audit possibly even under the threat of some penalty for willful misrepresentation, this would serve the public in a way that it's not being served. If the first time/full time rate is three-percent, and there are schools that have that—at least for a four-year graduation rate—if they cannot show that because of transfers and other complexities of the graduation rates that in fact the outcomes are better, the public need to know this and it needs to know it fast. If their employment rates are not good, if they've changed, if they've plummeted, the public needs to know that as well. Thus, the system of transparent audited disclosure, especially with a focus on student learning gains, could be a very powerful tool for moving quality assurance forward.

Christine: But what your suggesting sounds a lot more frequent and a lot cheaper than filling an entire room full of binders that cost a million dollars, at least according to Stanford University one year. Is this going to at least decrease compliance costs for universities?

Michael Poliakoff: Vastly. I do think we do think we need to be clear about this, that Stanford might be able to cough up a million dollars at five-year or ten-year integrals, although Lord knows I'd rather see that go into scholarship money for deserving students. But Stanford might be able to do that without it being much of a catastrophe for their budget. For a liberal arts college with fifteen-hundred students and an operating budget that could easily be in the thirty-forty-million-dollar range, coughing up a million dollars between the cost of pulling all the materials together, financing the visits, compliance with the suggestions, re demands, of the accreditor, this is a very significant part of the budget. This is a serious investment.

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And here's the other kicker about costs. Now we're going to move away from the regional accreditors who accredit most of the undergraduate technical schools around the country to the specialized accreditor, in this case the ABA, the American Bar Association, which has control over so many law schools. They insist on a certain percentage of tenured professors. They limit the amount of online learning, and they compel a minimum number of hours of seat time. This is micromanaging and it raises the cost of law school enormously, especially at a time when law school is so outrageously expensive and, to be sure, the job prospects are not as robust as they once were. This is a case in which the accreditor is really standing as quite an obstacle to students' success. So, yes. Cost is a real issue. This is not imagination.

Michael Itzkowitz: This goes to the question of costs and resources and time. If a school continues to perform very highly year after year, should it be a requirement that an accreditor does a site visit with them at the same interval that a school that continues to do very poorly year after year? Or should they visit that school, as Michael suggested, more often because we have these indicators to dig deeper? We have a first time/full time graduation right now and we may find out that that school, like University of Maryland, University College, actually only has three-percent of the student population that's first time/full time, and they actually graduate a much higher percentage of their transfer-in students. But if we have these indicators across the board and multiple warning flags, essentially, accreditors can use this to help differentiate their intervals for site reviews. And if they're able to do that now, and the Department has offered that guidance, but this is something that continue to be solidified within statute and regulations moving forward as well.

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Michael Poliakoff: Let me share a totally radical suggestion. Maybe site visits aren't all that necessary. If an institution can provide audited under, perhaps, even legal penalty, audited measures of the key performance issues, why does the school need to put together an entire roomful of records? I have been on accreditation visits, on a host of visiting team, what's going on there? Isn't there a better way of doing this? I'm talking here of schools that have a proven track record, a solid financial base. Why do we necessarily need a system this cumbersome? Now stepping back, if a school wants to have the benefit of a group of experts come in, just as many of them do for programmatic review, that's great. That's all part of professional development. That's part of institutional development. But why should this be the binary determinant of whether that school is fit to receive federal funding? I think it's time that we think more broadly of different ways that we can get at not necessarily accreditation, but get at the larger target of quality assurance.

Michael Itzkowitz: Yes. I think that this also goes back to thinking about: How do we reduce burden and costs? So this is a big part of the conversation and I think it should be very attractive for institutions, for accreditors and for our policy-makers right now, understanding that there are ways to reduce costs, burden and time while focusing on outcomes that are proven.

Michael Poliakoff: Nicely said, Michael.

Christine: Michael, isn't there another problem with accreditation as it applies to federalism?

Michael Poliakoff: Part of the problem of our less-than-orderly system of quality control is that accreditors have, in a number of high profile instances, moved into areas that have not direct relationship to educational outcomes. For example, I

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can't say in this State. We're in the District right now. But in my home state of Virginia, the Board of Visitors decided to terminate the President.

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Christine: At University of Virginia.

Michael Poliakoff: University of Virginia. Yes. They were exercising their statutory authority that comes right from the General Assembly. Now I'm not saying whether it was a good decision or a bad decision or well done or not well done. But the accreditor in this case, the Southern Association of Colleges and Schools, had no right to put that school on warning – in other words, saying that they would turn the spigot off of Title IV funds because they felt that the Board had acted improperly in its governance procedures. If they could have said, "University of Virginia has poor outcomes," which it doesn't, then the accreditor would be doing its job as a body that ensures quality education. In this case, they were intervening in a governance issue in which they had no legitimate authority. That is not a unique situation and it stems from the problem of not having the mission sufficiently clarified.

Christine: I want to talk a little bit about either non-traditional students or first-generation students and what they need from either accreditors or from quality assurance as a blanket that they're not currently getting.

Michael Itzkowitz: I think that we have a lot of students returning to school, going part time often, that are really there for financial reasons. A cited study is the UCLA Study, I think it comes out every year, that suggests that the number one reason that students are attending schools nowadays is financial and it's to get a job. So, ultimately, they need to understand what kind of supports are there for them. Is it an institution that can fit its schedule? What are their likelihood of graduating on time or within a reasonable amount of time? How much does it

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cost? How much debt will they have to take on? And will they be able to find a job within their field after they attend? It's very similar questions that all types of students that attend institutions are asking nowadays. That being said, what we do know is that only forty-seven percent of students nowadays are first time/full time students, so there's been a recent revelation in higher education. I think everyone's starting to understand that and that's becoming clear. I say that to say that we need to continue to improve our data collection. We need to continue to understand how part time students are doing at different institutions. And we also need to recognize those that are serving institutions really well so that we can share best practices and that they can work with other institutions that serve similar students.

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Michael Poliakoff: Yes, indeed. We always have to remind ourselves, when we look at data, that behind the data are the faces of students, of real people with real lives and real demands.

Christine: Real student loan burdens.

Michael Poliakoff: Yes, indeed. And be really aggressive about the transparency, the disclosure and the quality control. I go back to the chilling conversation I had some years back with a Provost who simply said, "Well, you know, our graduation rates are not so high but not everybody's cut out to be at this school," begging the question: Why did you admit students that you could pretty clearly predict were not going to make it? One can even put an algorithm together and figure out how much money comes to a school from students whose predictors indicated that they were highly at risk. If a school, God bless it, wants to take at-risk students, it better have a system whereby it can ensure a reasonable level of success. I cannot, it should not, be allowed to take students simply because, for

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the first semester or two, they will be there and there will be a revenue stream. That is part of the requirement of any quality control system.

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Michael Itzkowitz: Yes. And I think for all students in general, one of the most important statistics is we know that the students most likely to default on our loans, which is the worse case scenario, are the students that don't graduate. So for incoming students, for part time students, for transfer students, that's something that we should all keep in mind as one of the most important indicators.

Christine: That is so important and hopefully the House's new version of the Higher Education Act will do something to address these things. We're not really sure if the Bill is going far enough but it is demonstrating some sort of instinct in the right direction and we'll be watching closer for further analysis. Both Michaels, Michael Itzkowitz and Michael Poliakoff, thank you so much for joining us today.

Michael Poliakoff: Let me give a special thanks to Third Way. We're really honored to have you with us today and to work with you. Thanks so much for being here.

Michael Itzkowitz: Thank you so much for having us.

Christine: Our pleasure. To learn more about accreditation, please visit www.goacta.org or visit Third Way and see what they have to say. If you have questions or comments about this podcast, please send them to info@goacta.org. Until next time, I'm Christine Ravold and this is Higher Ed Now.

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