Research Corner

Following are links to recent articles and papers addressing the issue of Massive Open Online Courses, or MOOCs, and their impact on higher education.


- "Mission, MOOCs, and Money," by Kenneth C. Green, Founding Director, the Campus Computing Project. From the January-February 2013 issue of Trusteeship magazine, published by the Association of Governing Boards of Universities and Colleges.


- "Globalizing MOOCs," by Kris Olds, Professor and Chair, Department of Geography, University of Wisconsin – Madison. Published in the March 17, 2013 issue of Inside Higher Ed.
CIQG Advisory Council

- Nidaa Battrawy, President, Arab Network for Quality Assurance in Higher Education (PNQA)
- Barbara Buntingham, President, Commission on Institutions of Higher Education, New England Association of Schools and Colleges (USA)
- Su-John Daniel, Education Master, Beijing DeTao Masters Academy (China)
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- Michael Milligan, Executive Director, ABET (USA)
- Judy C. Miner, President, Football College (USA)
- Deane Neubauer, Senior Fellow, Globalization Research Center, University of Hawaii at Manoa (USA)
- Michal Neumann, Deputy Director General for Quality Assessment, Council for Higher Education (CHEL) (Israel)
- Peter Okechukwu, President, Global University Network for Innovation & Africa (Nigeria)
- Ved Prakash, Vice Chairman, University Grants Commission, New Delhi (India)
- Jamil Salmi, Consultant, Global, Tertiary Education Emergency Global View on Tertiary Education (USA)
- Craig Swenson, Chancellor, Augsburg University (USA)
- Lesley Wilson, Secretary General, European University Association (Belgium)
- Richard Yelland, Head of Division, Organisation for Economic Cooperation and Development (France)
- Jianxin Zhang, Director, Research Institute of Higher Education, Yunnan University (China)

Ex-Officio Members
- David G. Carter, Chair, Council for Higher Education Accreditation (CHEA) Board of Directors
- Judith Eaton, CHEA President
- Stanena Uvalic-Trumbic, CHEA Senior Advisor on International Affairs

Launched in September, 2012, the CHEA International Quality Group (CIQG) serves as a U.S.-based international forum for quality assurance and accreditation. The CIQG provides services to CIQG members intended to advance understanding of international quality assurance, assist institutions and accreditation/quality assurance organizations in their expanding international engagement and further enhance capacity for academic quality in international higher education.
PRESIDENT’S FY 2014 BUDGET PROPOSAL CONTAINS FUNDING FOR INITIATIVE TO ENCOURAGE NEW QUALITY VALIDATION SYSTEMS

On April 10, 2013, President Barack Obama released his Fiscal Year 2014 budget proposal. The proposal calls for $71 billion in discretionary funding for the U.S. Department of Education (USDE), an increase of 4.5 percent over the FY 2013 pre-sequester level.

The proposal includes funding for a First in the World initiative “to encourage institutions and other higher education stakeholders to come up with innovative solutions to address the completion challenge and improve higher education productivity” and to examine “new quality validation systems that can identify appropriate competencies, assessments, and curricula.”

In its budget summary, USDE noted that examining new validation systems would address the President’s call - in the documents supporting his 2013 State of the Union Address - for Congress to consider either incorporating value and affordability measures into the current accreditation system or setting up “an alternative to accreditation” that would provide a path for new providers to gain access to student financial aid based on performance and results (see Federal Update #29).

BILLS AFFECTING ACCREDITATION INTRODUCED IN U.S. SENATE AND HOUSE

CHEA is following several bills recently introduced in the U.S. Senate and House of Representatives:

- "The Students First Act of 2013" (S.405), introduced by Senator Frank Lautenberg (D-New Jersey) and cosponsored by Senators Richard Durbin (D-Illinois), Tom Harkin (D-Iowa) and John D. Rockefeller IV (D-West Virginia), would require mandatory reviews be conducted annually by USDE for institutions with issues that include being placed on probation or show cause by their accrediting organization. The bill also requires that USDE establish a central database of information on the accreditation, eligibility and certification of institutions of higher education.

- "The STEM Jobs Act of 2013" (S.303), introduced by Senator David Vitter (R-Louisiana), would make up to 55,000 visas available annually for immigrants who either have a doctorate in a field of science, technology, engineering or mathematics from a U.S. doctoral institution or have taken all doctoral courses while residing in the United States. For a doctoral degree or coursework to qualify, the institution must be accredited by an accrediting organization recognized either by USDE or the Council for Higher Education Accreditation (CHEA). A similar bill - "The STEM Visa Act of 2013" (H.R. 459) - has been introduced by Representative Darrell Issa (R-California) and also specifies that institutions must be accredited by a USDE- or CHEA-recognized accrediting organization.

GROWTH OF INTERNATIONAL ACCREDITATION ACTIVITY BY U.S. ACCREDITING ORGANIZATIONS NOTED

A comprehensive article in Inside Higher Ed highlighted the growth of international accreditation activity by recognized U.S. accrediting organizations that review and accredit non-U.S. institutions and programs. The article cited data from the CHEA Almanac Online that, during 2009-2011, U.S. accrediting organizations accredited 857 non-U.S. institutions and programs in 70 countries.
The article noted that while foreign accrediting activities are outside USDE's scope of review, CHEA has standards in its recognition criteria that address the accreditation of non-U.S. institutions and programs by U.S. accrediting organizations. The article also pointed to the recent launch of the CHEA International Quality Group and quoted CHEA President Judith Eaton saying "We really do have an international quality assurance community and the more we can work together internationally, the more we can address common issues."

**FLORIDA BILL COULD REQUIRE PUBLIC COLLEGES AND UNIVERSITIES TO GRANT CREDIT FOR ONLINE COURSES APPROVED BY FLORIDA**

A bill is moving forward in the Florida State Senate that could require public colleges and universities to grant credit for online courses not affiliated with their school and, in some cases, not accredited by recognized accrediting organizations. Senate Bill No. 904 was introduced by State Senator Jeff Brandes (R-District 22).

The bill's language states that "any individual, institution, entity or organization" could seek "Florida-accredited" status for courses offered online. The Florida Commissioner of Education and the Chancellor of the State University System would approve each Florida-accredited course and its assessment.

**CALIFORNIA LEGISLATION WOULD ENCOURAGE PUBLIC INSTITUTIONS TO GRANT CREDIT FOR MOOC COURSES**

Legislation has been introduced in the California State Senate to encourage the state's public higher education institutions to grant credit for approved online courses, including Massive Open Online Courses (MOOCs). The legislation - Senate Bill No. 520 - was introduced by Darrell Steinberg, President Pro Tempore of the California State Senate.

The bill would establish a California Online Student Access Platform for the purpose of creating a pool of approved and transferable online courses for credit. The bill describes the platform as a "faculty-led process that places the highest priority on educational quality through which online courses can be subjected to high-quality standards and review." It is unclear whether the provisions in the bill calling for public institutions to accept credits from online course providers would be binding.

**"OPEN SUNY" SEEKS TO EXPAND ONLINE EDUCATION**

The State University of New York (SUNY) has outlined a plan to implement "Open SUNY," bringing online courses offered at each of the systems 64 campuses onto a shared platform to increase access and expand online educational options for students. Open SUNY's final proposal calls for creating options for time-shortened degree completion, expanded use of prior-learning assessment, ensuring affordability, exploring options to grant credit for MOOC courses and other Open Educational Resources and developing a mechanism for assessing student learning and quality of instruction.

A statement issued by the SUNY Board of Trustees noted that more than 86,000 SUNY students registered for at least one online course in 2012. SUNY estimates that Open SUNY will add 100,000 degree-seeking students to the online enrollment total within three years.

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The Federal Update informs CHEA members and interested parties on federal policy developments related to self-regulation and peer review. Please direct any inquiries or comments to Jan Friis, CHEA Vice President for Government Affairs, at friis@chea.org or at (202) 955-6126.

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U.S. DEPARTMENT OF EDUCATION ANNOUNCES NEGOTIATED RULEMAKINGS

On April 15, 2013, the U.S. Department of Education (USDE) published a notice in the Federal Register that USDE will hold negotiated rulemakings over the next several years "to address more directly access to, and the affordability of, higher education and possible steps to improve the quality of higher education in the United States and to better encourage students to complete their education." "Negotiated rulemaking" is a process by which the federal government consults with key constituents as part of drafting or revising regulations.

USDE will establish a negotiated rulemaking committee later in 2013 to draft regulations intended to prevent fraud related to federal student aid program funds. The negotiated rulemaking will address issues that include cash management of federal financial aid funds, state authorization for programs offered through distance education, state authorization for foreign locations of institutions located in a state, clock-to-credit hour conversion, gainful employment, changes made by the Violence Against Women Reauthorization Act of 2013 to the campus safety and security reporting requirements in the Higher Education Act (HEA) and the definition of "adverse credit" for borrowers in the Federal Direct PLUS Loan Program. State authorization and gainful employment regulations have been the subject of litigation during the past two years, with several legal rulings blocking implementation by USDE.

USDE will hold three public hearings in May 2013 on the proposed topics for the negotiated rulemaking and will seek suggestions for additional topics. The hearings will be held in Washington, DC on May 21, in Minneapolis, Minnesota on May 23 and in San Francisco, California on May 30. More information on the hearings, including how members of the public may register to make presentations, may be found in the Federal Register notice. The negotiated rulemaking committee will begin meeting in September 2013 in the Washington, DC area. Committee members will be chosen following the public hearings.

Articles on USDE's announcement appeared in Inside Higher Ed and The Chronicle of Higher Education.

U.S. SENATE AND HOUSE OF REPRESENTATIVES HOLD HEARINGS ON COLLEGE AFFORDABILITY

The U.S. Senate Committee on Health, Education, Labor and Pensions (HELP) and the House Subcommittee on Higher Education and Workforce Training both held hearings on college affordability on April 16, 2013. The hearings were described as preparing for the process of reauthorizing the HEA, expected to begin later in 2013 or early in 2014.

The Senate hearing, "The Challenge of College Affordability: The Student Lens," featured testimony addressing the cost of higher education, The House hearing, "Keeping College Within Reach: The Role of Federal Student Aid Programs," included witnesses addressing student aid and its impact on college affordability. Copies of testimony and archived webcasts of the hearings are available on the committees' Websites.

The House Subcommittee on Higher Education and the Workforce will hold an additional hearing, "Keeping College Within Reach: Enhancing Transparency for Student, Families and Taxpayers," on April 24, 2013.

IMMIGRATION REFORM LEGISLATION INTRODUCED IN U.S. SENATE INCLUDES PROVISION ON ACCREDITATION

Tab 19 - Doc 2. p.3
A bill to provide for comprehensive immigration reform was introduced in the U.S. Senate on April 17, 2013 by eight Senate Democrats and Republicans. The legislation (S. 744) contains language similar to that in visa bills introduced recently in the Senate and House (see Federal Update #31) regarding accrediting organizations' recognition by USDE or the Council for Higher Education Accreditation.

The language in the Senate immigration reform legislation stipulates that, in order for immigrants with advanced degrees in a field of science, technology, engineering or mathematics from a U.S. institution or program to receive a visa, the institution that awarded the degree must be "accredited by an accrediting body that is itself accredited by either the Department of Education or the Council for Higher Education Accreditation."

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The Federal Update informs CHEA members and interested parties on federal policy developments related to self-regulation and peer review. Please direct any inquiries or comments to Jan Friis, CHEA Vice President for Government Affairs, at friis@chea.org or at (202) 955-6126.

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ACCREDITATION AND THE NEXT
REAUTHORIZATION OF THE HIGHER EDUCATION ACT

Judith S. Eaton

With the U.S. House of Representatives initiating hearings in April 2013 and seeking comment on the Higher Education Act (HEA) by August 2013, we know that reauthorization is here. We are on a road to change, however long this may take. The accrediting community is entering this road with some concern and apprehension that the federal government has already established a strong role in academic decision-making, challenging peer review and diminishing self-regulation. Congress and the U.S. Department of Education (USDE) enter this highway with clear expectations of the role they want accreditation to play, equipped with significantly expanded tools for direct oversight of the accreditation process as well as colleges and universities.

What will this reauthorization mean for traditional accreditation and its 60-year partnership with the federal government? Will this relationship, once characterized by deference to academic expertise in judging academic performance and public confidence in self-regulation and peer review, be coming to a close? Or will the reauthorization be an opportunity to reframe the accreditation-federal government relationship such that the ideals and value of accreditation can be sustained?

The major features of the government’s current expectations of accreditation and quality have been before us for some time. Quality is defined as compliance with federal law and regulation in relation to employment, graduation, consumer protection, transparency and affordability. Needed innovation in higher education requires government direction and assistance, including federal review of institutions even after accreditation review.

For quality in colleges and universities, the government is relying on tools such as Web-based interactive data sets, College Navigator and College Scorecard, that enable students and the public to compare admission requirements, tuition, available student aid, retention and graduation rates as well as employment after graduation. For the operation of accrediting organizations, USDE is relying not only on more expansive law and regulation, but also a Guide for Preparing/Reviewing Petitions and Compliance Reports. The 82-page Guide, initially developed in 2010, has come to function as a detailed checklist required of all accreditors, emphasizing compliance with federal regulation — rather than peer-based review—as needed to judge quality.

How We Got Here

2006: Futures Commission Report
2008: Higher Education Opportunity Act
2009: New Administration

The federal government has not always approached quality and accreditation in this fashion. The current perspective is grounded in a 2006 U.S. Secretary of Education's Commission on the Future of Higher Education report that was strongly critical of colleges, universities and nongovernmental
Accreditation. Accreditation was called upon to provide more robust public accountability, to strengthen the rigor and thoroughness of its reviews, take responsibility for what were characterized as higher education's limitations in serving students and serve as a catalyst, not a barrier (as alleged in the report) to educational innovation.

Some of the commission's criticism became part of the foundation for the 2008 reauthorization of HEA. In the name of perceived inadequacies in accreditation, additions to the law included expanded federal oversight of academic areas such as transfer of credit, enrollment growth and distance learning, penetrating the arena of academic activity that had traditionally been the province of academic faculty.

Efforts to expand federal influence over accreditation accelerated as a new administration took office in 2009. Crucially, the 2009-2010 negotiated rulemaking (government consultation with constituents as part of establishing new or revised regulation) resulted in a federal definition of "credit hour," the fundamental building block of curricula, to be enforced by accreditors. This meant that faculty no longer have full responsibility for determining the credits associated with courses and programs. This action positioned the federal government to influence college and university curricula throughout higher education.

A 2012 report from the National Advisory Committee on Institutional Quality and Integrity (NACIQI), the group of academic, policy and public leaders assisting the U.S. Secretary of Education in making judgments about the federal recognition of accreditors, advanced two vital recommendations for action that further expanded the government's role. First, the report deemed quality assurance - not only quality - to be a federal interest. Second, the report viewed it as desirable at least to explore common standards across all accrediting organizations, especially for regional accreditation. The first action justifies the USDE role in directing the operation of accrediting organizations. The second action can establish a foundation for government judgment about academic quality based on the same national expectations for all colleges and universities.

With the convening of a new Congress and the annual State of the Union in 2013 came an unusual and notable mention of accreditation. The document accompanying the State of the Union was explicit, that if traditional accreditation could not meet expectations, then "a new, alternative system of accreditation" could be developed, presumably by the federal government. In April, the administration's proposed 2014 budget reinforced this view by calling for "quality validation systems run by independent parties" focused on college completion or "third-party validation systems that identify competencies, assessments and curricula for specific fields."

The last seven years, then, have left us with accrediting organizations subject to greater oversight and regulation, greater government engagement of academic issues, data sets that provide the opportunity for government judgment about quality and talk about alternative accreditation systems. We enter reauthorization with government now playing a more decisive role in making judgments and setting expectations of academic quality than at any time in the past.

**Reauthorization Options**

As of now, the most likely result of the next reauthorization is continued expansion of legislation and regulation that sustains government control. This means more direct government authority over the operation of accrediting organizations - their standards, policies and processes. It means the continued growth of federal review of individual institutions, in addition to accreditation. It means the federal government expanding its influence in the defining and judging of academic quality.

For institutions and accreditors troubled by this development, we need to make a compelling case for an alternative scenario: a streamlining of the current federal review of accrediting organizations, perhaps using the current federal interest in reducing regulation overall. This would include diminishing the extent and detail of oversight of accreditation and rethinking the distribution of responsibilities between accreditation and USDE such as oversight of student aid. This response would be an effort to re-establish the practice of "holding higher education and accreditation accountable for quality" that used to prevail between the federal government and accreditation and ending the prescriptiveness and granularity of current federal practice when it comes to accreditation and the quality of colleges and universities.

Beyond reacting to what is before us, institutions and accreditors also need to energetically make a powerful public case for the many accomplishments of the accreditation and academic communities in providing sustained, robust leadership for quality and appropriate accountability. The evidence is there but not adequately marshaled or deployed.
The academic and accreditation communities place enormous emphasis on student achievement, have focused intently on a completion agenda, are embracing innovation and have made huge strides in transparency and student protection. But we would not know this from reading opinion leaders in the education and general press. We would not know this listening to Congress and USDE. Perhaps this is because, at the same time, we affirm our commitment to intellectual development as well as economic development, just as we remain committed to the effectiveness and value of peer review, academic freedom and responsible institutional self-determination. While we accreditors and academicians understand that the combination of peer-based quality review and appropriate accountability provides the greatest benefit to students, we have yet to persuade significant others.

Alternatively, accreditors may decide “enough is enough” and depart the gatekeeping relationship with the federal government. Is this option realistic for accreditors of institutions? What would the end of the partnership mean for colleges and universities? Approximately half a dozen programmatic accreditors have done this over the past ten years. These organizations have determined that they do not need the federal partnership to serve students and society.

Finally, we need to anticipate yet additional steps that government may take. This might include the development of a federal accreditation system as briefly described in the State of the Union document and the 2014 budget, either alongside traditional accreditation or in its place. This system could involve primary emphasis on examination of institutional performance through, e.g., graduation rates, retention, transfer, employment and affordability, with student aid tied to performance. The tools presently available to government might expand to include (1) bright-line expectations of threshold institutional performance, (2) institutional reporting on performance and (3) triggers if performance does not meet bright line expectations. Federal review of institutional performance would augment or replace traditional accreditation focused on academic quality.

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The reauthorizations of 1992 and 1998 had a powerful effect on colleges, universities and accreditation. The many changes that resulted did not, however, alter the fundamentals of the operation and aspirations of accreditation. The reauthorization initiated in April, building on 2008, may emerge as pivotal: This will be the reauthorization that determines whether and to what extent traditional accreditation is to be sustained.

1This review, known as “recognition,” is required of all accrediting organizations that function as “gatekeepers” or reliable authorities on academic quality, providing access to federal funds. Recognition reviews must take place at least every five years.
May 2013

To: Commissioners, ACCJC

From: Gary Davis

Re: Report from the Accrediting Commission for Schools/WASC

As the liaison Commissioner from the ACS to the ACCJC, it is my pleasure to provide you this update of events and developments from the Accrediting Commission for Schools.

ACS WASC Commission Leadership
For 2013, the ACS is being led by Mr. Harlan Lyso, Commission Chairperson, and Ms. Val Staley, Commission Assistant Chairperson. The ACS is now authorized to include 32 Commissioners. Also for this school year, the standing committees include the Nominations Committee, Finance Committee, and Reading Group Chairpersons.

ACS WASC Membership
ACS now accredits 4,176 schools, the bulk of which are in California, Hawaii, the Pacific Islands, and Southeast Asia.

WASC Corporate Structure Bylaws
The proposed Bylaws for the new WASC corporate structure, which essentially creates full independence for each of the three Commissions, were presented for consideration of the membership. The motion to “Approve the Amended and Restated Bylaws of the Western Association of Schools and Colleges” carried by unanimous vote.

Budgetary Considerations
After discussion, the Commissioners approved staff’s recommendation to upgrade WASC/ACS technology (website and database) within a budget of $150,000. Also, Fee Schedules for 2013-14 were slightly increased, and member schools have been notified of the changes; fees have not been increased since 2009.

Reading Groups and Subsequent Actions
After Reading Groups convened and considered several reports and Visiting Committee recommendations, the Commissioners acted to approve Candidacy Status for certain Initial Visits, Initial Accreditation for other Initial Visits, Substantive Changes, decisions on Appeals Visits, and act on status of accreditation following full Self-Study visits.

Search for New Executive Director
Information was shared with Commissioners related to the search for an Executive Director to succeed Dr. Dave Brown, who is retiring from this position in June 2013. Announcements for the position are out, and the application process will soon begin.

Accreditation “Status”
Beginning 2012-13, ACS member schools receiving a comprehensive Self-Study visit are eligible for Accreditation “Status,” rather than a “term” of Accreditation. Formerly, the Accrediting Commission granted one of the following “terms” of accreditation: 6 years with a mid-cycle progress report; 6 years with a mid-cycle...
progress report and a school visit; 3 years; 2 years, 1 year, or a denial of accreditation. The new "Status" of Accreditation includes the options shown below for the Visiting Committee to recommend and the ACS to grant:

<table>
<thead>
<tr>
<th>The Visiting Committee's CONFIDENTIAL recommendation to the Accrediting Commission:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Six-Year Accreditation Status with a Required Mid-cycle Progress Report:</strong> There is compelling evidence that the school needs little, if any, additional support for high-quality student learning and the implementation, monitoring, and accomplishment of the schoolwide action plan, including the identified critical areas for follow-up.*</td>
</tr>
<tr>
<td><strong>Six-Year Accreditation Status with a Required Mid-cycle Progress Report and One-Day Visit:</strong> There is compelling evidence that the school needs additional support, feedback, and encouragement in strengthening student achievement and the school's program through the schoolwide action plan that includes the identified critical areas for follow-up.*</td>
</tr>
<tr>
<td><strong>Six-Year Accreditation Status with a Required Mid-cycle Progress Report and Two-Day Visit:</strong> There is compelling evidence that the school needs additional support and a longer mid-cycle visit is needed to review the school's action plan progress in areas such as the analysis and use of student achievement data, the instructional program, the growth and development of the leadership and staff, governance, and resource allocation.*</td>
</tr>
<tr>
<td><strong>One-Year Probationary Accreditation Status with a Required In-depth Progress Report and Two-Day Visit:</strong> The school deviates significantly in one or more areas and needs serious additional support, feedback, and encouragement in meeting the identified critical areas for follow-up in the visiting committee report.*</td>
</tr>
<tr>
<td><strong>Accreditation Status Withheld:</strong> The school does not meet the WASC criteria/indicators and other accreditation factors and deviates significantly in several areas that impacts student learning and well-being, the school's program, and supporting operations.*</td>
</tr>
</tbody>
</table>

ACS staff has reported very few negative comments from the field or from Visiting Committee team members regarding the new "status" of accreditation. A more formal survey will be conducted before the end of the school year.

**Executive Director's Report**
Dr. Dave Brown's report included the update that WASC/ACS, with Commissioners' encouragement, continues to cautiously explore opportunities for accrediting schools outside of the traditional accrediting area. While the WASC/ACS primary non-domestic focus remains on the Islands of the Pacific and countries located in Asia, staff has begun to respond to invitations to work with schools in Europe and the Middle East. WASC/ACS now accredits Pamoja Education (the world's only online IB approved educational program) and ThinkGlobal School, which are both headquartered in Europe. ACS has also completed 15 Initial Visits in Saudi Arabia, including schools in Jeddah, Dammam, and Riyadh. A partnership with EDI (Elite Development International) in Jeddah has been expended to facilitate work with schools in other Middle East Countries, as well. Also, staff has received an application from a school in Doha, Qatar.

**Next Commission Meetings**
Future meetings of the ACS/WASC Commission will be held—
- June 24-25, 2013 -- Hilton San Francisco Airport
- January 27-28, 2014 -- San Diego
- April 28-29, 2014 -- Burlingame
- June 23-24, 2014 -- Burlingame