

Oral Testimony of Dr. Michale S. McComis, Executive Director,  
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Before the  
House Committee on Education and the Workforce  
For the Hearing  
“Strengthening Accreditation to Better Protect Students and Taxpayers”

April 25, 2017

Madame Chair and members of the Committee, my name is Dr. Michale McComis and I am the Executive Director of the Accrediting Commission of Career Schools and Colleges (ACCSC), a private, non-profit independent national accrediting agency recognized by the United States Secretary of Education. I am honored to appear before the Committee this morning to discuss accreditation, the contributions that it makes to the quality of education in this country, and the ways that it might be improved.

Accreditation has been relied upon for educational quality assessment purposes by the federal government for six decades. Although accreditation has come under increased scrutiny by policy makers, accreditation can and should continue to serve in its gate-keeping capacity, albeit in a strengthened form. Accreditation employs an earnest and collaborative approach within a peer-review network that identifies best practices and assesses how well an institution meets

those best practice standards. It is not, nor can it be, a one-size-fits-all system with rudimentary metrics that do not take into account subjective and qualitative elements of an institution's operations and success.

Accreditation derives its strength from four essential pillars that are built upon a foundation of peer review. Those pillars are: 1) standards or best practices, 2) self-evaluation, 3) on-going institutional improvement, and 4) accountability. The success of any accrediting agency is based upon the strength of each of these fundamental pillars in the agency's system and the strength of the peer review foundation.

Accreditation also takes different forms and serves a myriad of institutions and as such institutions will be accredited by agencies with different standards and different expectations of learning and outcomes. This is both appropriate and necessary and through this lens the differences amongst accreditors should be viewed as a strength to our system.

I recognize that Congress has a vested interest in ensuring the strength of accrediting agencies. As such, the Congress should seek to make changes to the Higher Education Act that will provide such assurance without injecting undue federal intrusion into the academic processes of higher education or that might serve as a barrier to innovation.

Judgments regarding the effectiveness of accreditation should not lose sight of the fact that the oversight of higher education is a shared responsibility amongst accreditors, states, and the federal government. Triad partners working together strengthens the existing oversight system and retains the positive qualities of accreditation and the expertise that peer-review represents and delivers.

So then, how can accreditation be strengthened through the Higher Education Act? The following are some suggestions for the Committee to consider:

- 1. Outcomes:** Outcomes measures are not a one-size-fits-all solution and should not be mandated by Congress or the U.S. Department of Education. However,

accreditors must define the right set of measures and metrics to evaluate institutional and student success.

- 2. Transparency:** Accreditors should be expected to provide useful disclosures of the accreditation actions taken that can help the general public make informed decisions about the quality of an institution or program.
- 3. Differentiation:** Allow for differentiated levels of accreditation which could place schools in different categories and move beyond binary decisions regarding quality.
- 4. Credit Hour Definition:** Seat-time requirements for funding programs do not preserve academic integrity nor promote competency assessment and as such the federal definition of a credit hour and the complex clock-hour conversion formulas should be removed from the federal regulations. In my experience, competency-based models of student assessment are superior to “seat-time” models of student fulfillment, particularly in “hands-on” fields such as welding or nursing.

If accreditors are going to be the purveyors of educational quality assessment, then accreditors should be given the discretion necessary to define the elements that go into the assessment paradigm.

- 5. Accreditation Area of Focus:** It may be useful to expect accreditors to focus narrowly the types of institutions accredited in order to ensure a strong peer-review foundation and solid measures related to outcomes and accountability.
- 6. Transfer-of-Credit:** Accreditors should be expected to have and enforce standards that prevent institutions from unfairly or unjustifiably denying credit transfer.
- 7. Changing Accreditors:** Institutions that have been subject to a monitoring sanction from one accreditor should not be allowed, for federal financial aid purposes, to seek a new accreditor for some set period of time after the sanction has been lifted.
- 8. Indemnification.** Given the high stakes associated with the loss of accreditation and the ensuing loss of access to Title IV student federal financial aid funding, the federal government should afford accreditors some

protections as a means to prevent specious and costly lawsuits from being brought against accrediting agencies.

Other areas for the Committee to consider as I included in my written testimony include the Appeals Process and strengthening substantive change requirements. I hope the Committee finds these recommendations useful as it goes about its work and I am happy to provide additional details regarding each.

I look forward to continuing the dialogue on ways to strengthen accreditation as means to ensure that it continues to fulfill its role as a gatekeeper to the Title IV federal student financial aid programs.

Thank you again for the opportunity to testify before the Committee and I stand ready to answer any questions you may have.