

HIGHER EDUCATION COMMITTEE OF 50 RECOMMENDATIONS

ACCOUNTABILITY

INTRODUCTION

In late 2017, the National Association of Student Financial Aid Administrators (NASFAA) was awarded a grant to convene a group of forward-thinking campus leaders tasked with developing policy solutions to help students surmount the obstacles that prevent them from enrolling in, paying for, and graduating from college. NASFAA used the grant funding to facilitate the Higher Education Committee of 50, a group composed of college presidents, enrollment managers, admissions staff, financial aid and bursar leaders, members of governing boards, students, and other leaders from all postsecondary institution sectors. Combined, they hold memberships in more than 140 higher education-related professional associations, with many serving in multiple leadership roles.

The Higher Education Committee of 50 divided their work into four subgroups reflecting the four policy areas. Each

subgroup reviewed relevant literature, heard from experts, and engaged in hours of discussion and debate before developing their respective recommendations. NASFAA released draft recommendations for public comment, and the subgroup members analyzed and reviewed all feedback. They incorporated much of this feedback into the final recommendations.

The Higher Education Committee of 50 executive summary offers 36 recommendations for consideration by Congress in the hope that they will foster discussion and guide future policy decisions for the reauthorization of the Higher Education Act of 1965, as amended. This brief presents the findings of the Accountability Subgroup.

The full report, including additional details, a reference list, and a full list of Higher Education Committee of 50 members, is available at <https://www.highereducationcommitteeof50.org>.

ACCOUNTABILITY RECOMMENDATIONS

The Accountability Subgroup considered the many facets of accountability policy, including the current accountability landscape and options and principles for any future policymaking in this space. The subgroup defined **accountability** as the meaningful representation of useful information to (1) disclose measures of how postsecondary institutions, based on institutional mission, have been responsible stewards of education; (2) present, using a progress-based, non-punitive approach, postsecondary institutions' progress on performance measures as responsible stewards of education; and (3) equip citizens with these measures to make informed decisions and instill public trust.

The subgroup operated on four guiding principles:

1. Accountability measurements must take into account different institutional types and missions; one-size-fits-all does not work.

2. A data-informed approach should guide accountability policy.
3. Any changes to accountability policy should be implemented gradually to allow time to review their impact.
4. Institutions that meet or exceed certain accountability measures should be exempt from certain administrative and reporting requirements.

Accountability Recommendation 1: Keep the following current accountability measures in place, unchanged:

- ▶ Withdrawal rates
- ▶ Financial responsibility scores
- ▶ Program reviews
- ▶ Financial and compliance audits

Accountability Recommendation 2: Keep the following current accountability measures in place, but alter them as follows:

- ▶ Cohort default rates (CDRs): Modify the CDR measure. (Option B in “Areas for Future Work,” found in the full report, discusses one idea the subgroup considered.)
- ▶ Gainful employment: Retain gainful employment requirements and consider certain alterations to the current rule. (The subgroup recognized that the future of the regulation remains uncertain due to recent U.S. Department of Education rulemaking actions.)
- ▶ 90/10 rule: Return the 90/10 rule ratio to 85/15. Also, include U.S. Department of Defense (DOD) military tuition assistance benefits and veterans affairs (VA) benefits as part of the calculation of federal revenue (i.e., the 85%, from which these benefits are currently excluded).

- ▶ Accreditation: Require Title IV gatekeeper accreditors to develop and adopt common elements for the function of institutional reflection. This requirement would maintain institutional independence and identity while expecting a baseline of rigor in areas such as learning assessment, retention, graduation, and employment.

Accountability Recommendation 3: Allow a Student Unit Record Data System (SURDS) for establishing an institutional accountability policy, as reflected in the Transparency Subgroup’s recommendations. Use College Scorecard data and other sources to measure student experience, progression, and outcomes, and alumni success. When an institution places substantially lower than institutions with similar missions, require an additional, Department of Education-approved review by the regional accreditor.

CONCLUSION



In a single year, the Higher Education Committee of 50 has accomplished work of extensive breadth and depth, addressing a wide range of topics while drilling down on practice and policy to develop thoughtful, innovative recommendations. Nonetheless, the Committee recognizes and deeply believes this work is just a starting point for future HEA

reauthorization discussions and understands that many of the recommendations will require future work and refinement. The 116th Congress provides a fresh new policy window to explore HEA reauthorization, and Committee members will ensure their recommendations reach key stakeholders, inform related discussions, and lay the groundwork for further exploration.

