2018-2019
Standards and Eligibility Requirements Revision
Regional Survey and Town Hall Feedback
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**Introduction**

In its 102nd year, the Northwest Commission on Colleges and Universities (NWCCU) continues its mission to assure educational quality, enhance institutional effectiveness, and foster continuous improvement of colleges and universities in the Northwest region. Assurance of continuous improvement and educational quality is facilitated through analytical institutional self-assessment and critical peer review based on NWCCU’s evaluation criteria that reflect and respect the diversity of its member institutions.

As part of its ongoing process of self-reflection, and in accordance with U. S. Department of Education regulations and the NWCCU Bylaws, NWCCU began its cycle of review for its Eligibility Requirements (“ERs”), Policies, and the Standards of Accreditation (“Standards”) in August 2018.

The process of revision has included, and will continue to include, the opportunity for feedback from key constituents, including institutional leadership, faculty, staff, and students, as well as the public. This self-reflective exercise provides all constituents the opportunity to assess the processes around NWCCU’s accreditation activities (including the cycle of evaluation and the methods of evaluation).

The process is overseen by the NWCCU Bylaws, Standards, and Policies Committee, which is chaired by Board of Commissioners’ Secretary, Deneece Huftalin, President, Salt Lake Community College. During its initial meetings, the Committee charged the staff with a comprehensive system of engagement and feedback solicitation that would lead to a draft of the 2020 Accreditation Standards and Eligibility Requirements that would be concise, reduce burden on institutions, promote consistency, and focus the Commission’s primary activities around student success.

**Revision Timeline and Process**

The timing for feedback and a final decision by the Board of Commissioners is as follows:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date(s)</th>
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<tr>
<td>Public Call for Comment Period (Via Confidential Survey)</td>
<td>September 1, 2018 through December 1, 2018</td>
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<tr>
<td>Alaska Town Hall – University of Alaska- Fairbanks</td>
<td>September 24, 2018</td>
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<td>Montana Town Hall – University of Montana- Missoula</td>
<td>September 25, 2018</td>
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<td>Idaho Town Hall – Boise State University</td>
<td>September 28, 2018</td>
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<td>Nevada Town Hall – UNLV</td>
<td>November 5, 2018</td>
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<td>Oregon Town Hall – Portland State</td>
<td>November 6, 2018</td>
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<td>Utah Town Hall – Brigham Young University</td>
<td>November 7, 2018</td>
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<td>Annual Meeting and Listening Session - Seattle, Washington</td>
<td>November 14, 2018</td>
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<td>Online Town Halls</td>
<td>December 6 and 11, 2018</td>
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<tr>
<td>Event</td>
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<tr>
<td>Discussion and Action by the Bylaws, Standards, and Policies Committee</td>
<td>December 15, 2018</td>
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<td>Discussion and Action by the Board of Commissioners</td>
<td>January 8, 2019</td>
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<td>Issuance of First Draft</td>
<td>February 2019</td>
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<tr>
<td>Call for Comment Period on First Draft of Revised Standards (Via Confidential Survey)</td>
<td>February through March 2019</td>
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<tr>
<td>Online Regional Town Halls</td>
<td>February 2019</td>
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<tr>
<td>Revisions by the Bylaws, Standards, and Policies Committee</td>
<td>April 2019</td>
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<tr>
<td>Final Recommendation to the Board of Commissioners</td>
<td>June 2019</td>
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<tr>
<td>Call for Comment Period on Second Draft of Revised Standards (Via Confidential Survey)</td>
<td>July 2019</td>
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<tr>
<td>Electronic Vote to Adopt Standards by the Board of Commissioners</td>
<td>August 2019</td>
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<td>Electronic Vote of the NWCCU Membership</td>
<td>August 2019</td>
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<tr>
<td>Training and Orientation on Revised Standards</td>
<td>September through October 2019</td>
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<tr>
<td>Implementation of Revised Standards, Policies and Processes</td>
<td>January 2020</td>
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**Current Standards: Design and Function**

The current NWCCU processes were designed to identify and address issues of non-compliance, and to also focus more broadly around mission fulfillment, educational quality, and student achievement. The five Standards for Accreditation (http://www.nwccu.org/accreditation/standards-policies/standards/) adopted in 2010 were statements that articulate the quality and effectiveness expected of accredited institutions, and collectively they provided a framework for continuous improvement within institutions. The Standards also served as indicators by which institutions are evaluated by peers. The standards were designed to guide institutions through a process of self-reflection that blends analysis and synthesis in a holistic examination of:

- The institution’s Mission and Core Themes;
- The translation of the Mission’s Core Themes into measurable objectives supported by programs and services;
- The appraisal of the institution’s potential to fulfill the Mission;
- The planning and implementation involved in achieving and assessing the desired outcomes of programs and services; and
- An evaluation of the results of the institution’s efforts to fulfill the Mission and assess its ability to monitor its environment, adapt, and sustain itself as a viable institution.
Through its Five Standards, Policies, and procedures, NWCCU determined success with respect to student achievement within the context of the unique institutional missions, core themes, geographic parameters, and historic performance.

**Future Consideration: Themes and Questions**
NWCCU has sought feedback from a broad array of stakeholders, including students, institutional leadership, faculty, staff, and the public, to develop evaluation criteria and an efficient process that supports and recognizes high quality practices, while ensuring that practices are in the best interest of students. The Standards of Accreditation must be able to respond to diverse institutions facing unique sets of circumstances, and at the same time provide clarity around compliance and an opportunity for continual improvement and self-reflection.

The process of feedback collection has centered around five themes, which have been integral in Town Hall conversations, the NWCCU Annual Meeting, and a survey designed to gather feedback from a diverse set of stakeholders (faculty, staff, administrators, Commissioners, legislators, and the public). These five themes are:

1. Student Achievement and Success
2. Governance
3. Efficiency and Effectiveness
4. Risk-Based Accreditation and Alternative Pathways
5. Transparency

The 2018-2019 Standards and Eligibility Requirements Revision reflects an effort to streamline current standards and processes and to provide a comprehensive approach to evaluate institutions within the requirements of the United States Department of Education, focused on the purpose of accreditation: *assuring academic quality and the success of students within member institutions* (https://www2.ed.gov/admins/finaid/accred/accreditation.html).

**Theme One: Student Achievement and Success**
Since the adoption of the 2010 Standards, regional and national policy-makers and thought-leaders have highlighted the need to pay greater attention to measures of student success, including completion, graduation, retention, student loan default rate, employability, and long-term earnings for students that would demonstrate a “value” of the education achieved. In 2017, The Council of Regional Accrediting Commissions created performance “thresholds,” and all regional accreditors conducted a study of two year institutions with an IPEDS graduation rate of 15% or fewer and all four year institutions with an IPEDS graduation rate of 25% or fewer (https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4e07fc8660dd9.pdf).
In 2018, NWCCU conducted a Pilot Study with the National Student Clearinghouse to look at alternate measures of student achievement and identified retention, transfer, and overall completion rate as additional measures that provided additional clarity on institutional performance. Recent proposed federal legislation and United States Department of Education regulatory reforms highlight the need for NWCCU to provide institutions greater support for student achievement and to provide ongoing evaluation and monitoring of student success. In evaluating how best to ensure student achievement and success, NWCCU is interested in feedback related to the following questions for consideration.

The questions offered for feedback in the regional survey, town halls, and Annual Meeting included:

- How can Standards promote student success (learning, attainment, core skills)?
- Should the Standards require institutions to focus on common student outcomes (critical thinking, problem solving, quantitative reasoning, verbal and written communication, professionalism and ethics, etc.)?
- Should the Standards establish minimum thresholds for graduation, completion, retention, and loan default rates?

**Theme Two: Governance**

NWCCU has seen an increasing number of public and private institutions partnering with, being acquired by, or utilizing larger educational systems. At the same time, a larger conversation in federal policy circles and the United States Department of Education has been underway regarding what constitutes appropriate operational independence and the appropriate role of governing boards.

The questions offered for feedback in the regional survey, town halls, and Annual Meeting included:

- What is the role of NWCCU in evaluating the governance structures of institutions, particularly those institutions within a public or private system?
- What criteria are required to decide that an institution is operating independently?
- What criteria provide evidence for the sustainability of an institution affiliated with a system?
- Should evaluations include interviews with system or corporate members? If so, what positions or in what areas?
- How should NWCCU evaluate the financial relationships of institutions that are housed within a system and those that are outside a system?
- Should governance and financial items be separated into an offsite review or separate report for institutions affiliated with systems?
- What should the Standards require to support ongoing monitoring and engagement with institutions affiliated with systems to assure transparency and institutional success?
**Theme Three: Process Efficiency and Effectiveness**

NWCCU’s current process of review includes: annual reporting, a comprehensive Mission Fulfillment and Sustainability report and visit in year seven of an institution’s accreditation cycle, a Mission and Core Themes Report eighteen months following reaffirmation, and a Mid-Cycle report and visit five years following reaffirmation. Additional Ad Hoc and Special Reports may be requested by the Board of Commissioners. NWCCU asks institutions to identify Core Themes and Indicators to measure the institution’s mission fulfillment throughout its accreditation cycle, and evaluation visits, annual reporting, and other special reports help focus accreditation activities.

Feedback from the 2017 NWCCU Task Force suggests that member institutions believe additional interaction with evaluation teams and the Commission in the form of pre-visit conference calls and compliance reports could make the process of engagement with teams more valuable and shift the purpose and substance of visits from mere compliance and quality assurance to that of quality assurance and institutional improvement.

Other regional accrediting agencies have adopted varying timelines for reaccreditation, differing methods of engagement with teams, and differing uses of technology.

The questions offered for feedback in the regional survey, town halls, and Annual Meeting included:

- Is the current structure of visits and reporting sufficient, onerous, or optimal (Mission and Core Themes, Mid-Cycle, and Year Seven)?
- What changes could be made to the process to enhance institutional mission fulfillment and ensure public confidence in the process?
- Are the Core Themes valuable and should they remain a central part of the Standards? If not, what could replace the core themes to articulate an institution’s mission fulfillment?
- Should federal compliance items and capacity issues (library resources, infrastructure, and policies) be separated into an offsite review or separate report and the comprehensive report be more focused on institutional quality?
- How could NWCCU utilize technology to expedite the process of accreditation and minimize institutional reporting burdens?

**Theme Four: Risk-Based Accreditation and Alternative Pathways**

The national conversation around risk-based accreditation, offering alternative pathways to reaccreditation based upon the performance and capacity of each institution has drawn support from advocacy groups supporting a variety of institutional types. (https://www.insidehighered.com/quicktakes/2016/06/23/public-university-group-backs-risk-based-accreditation). Multiple other regional accreditors have created alternative pathways based upon those created in other countries (https://www.chea.org/risk-based-approach-quality) with the goal of focusing accreditation visits and self-studies around the specific needs of individual
institutions. NWCCU institutions through its 2017 Annual Survey supported a move for NWCCU to develop and deploy alternative accreditation approaches.

The questions offered for feedback in the regional survey, town halls, and Annual Meeting included:

- Should Standards be common to all institutions, regardless of size and complexity, or should there be separate Standards for classes of similar institutions?
- Should there be alternative pathways to reaffirmation for institutions that have demonstrated high performance in student achievement, student learning, and compliance with the Standards in previous cycles?
- What should be the criteria to consider an institution eligible for alternative accreditation?
- What risk factors should preclude an institution from being considered for alternative accreditation?

Theme Five: Transparency

As NWCCU seeks to validate and support the efforts of its institutions, no other issue is as complicated or controversial as transparency. Reports by the Center for American Progress (https://www.americanprogress.org/issues/education-postsecondary/reports/2018/04/25/449937/college-accreditors-miss-mark-student-outcomes/) and The Third Way (http://thirdway.imgix.net/pdfs/are-the-watchdogs-watching-demystifying-accreditation.pdf) have issued publications mirroring feedback from the National Advisory Council on Institutional Quality and Integrity (NACIQI), the oversight body providing input to the United States Department of Education on the activities of accrediting agencies monitoring academic quality for postsecondary education (https://sites.ed.gov/naciqi/).

The expansion of federal reporting and databases (including the College Scorecard, the College Navigator, and the Accreditor Dashboard) and the efforts toward transparency from other regional accreditors by publishing commission action letters and evaluation team reports signal a need for clear process on when and how to best communicate NWCCU decisions.

The questions offered for feedback in the regional survey, town halls, and Annual Meeting included:

- Should consumer protection be imbedded in the Standards? If yes, where and how?
- What data should be collected to support ongoing monitoring and engagement to assure transparency, institutional success, and student success?
- What data should be collected to support ongoing monitoring (such as annual reports or special reports) and engagement to support institutional success?
- What technology is required by NWCCU and institutions to support the ongoing monitoring and engagement to assure transparency and institutional success?
• What data should be shared with key stakeholders and what data should made available to the public, and how should it be shared?

**Survey and Feedback Collection Method**

An online survey was created using the five themes of Student Achievement and Success, Governance, Efficiency and Effectiveness, Risk-Based Accreditation and Alternative Pathways, and Transparency. The survey was reviewed by NWCCU staff, institutional members, and the NWCCU Bylaws, Standards, and Policies Committee and distributed with a Press Release and electronic announcement to the public on August 1, 2018. The survey contained 10 Likert-Type questions and open-ended text boxes for less structured engagement. All responses were anonymous, and respondents had the opportunity to provide their contact information in a separate field to receive a copy of this report. In addition, stakeholders were given the opportunity to send written or electronic feedback to Commission Staff.

In total, 155 respondents completed the Survey. Respondents who identified a category of membership or affiliation were distributed according to the following self-identified designation:
In addition to the electronic survey, members of the public, faculty, staff, students, and stakeholders were given the opportunity to submit comments via email or to participate in one of the six regional town halls, two online town halls, or the 2018 NWCCU Annual Meeting. In total, more than five hundred individuals participated in these activities and the comments were collected, analyzed, and included in the materials reviewed by the NWCCU Bylaws, Standards, and Policies Committee.

Survey, Town Hall, and Annual Meeting Results

Student Achievement and Success
Respondents were asked how the Standards could promote student success (learning, attainment, and core skills). One hundred and twenty-one survey respondents shared open-ended feedback regarding the ways in which NWCCU could assure or support institutional success. Respondents expressed a broad and diverse set of ideas related to the establishment of core themes, measures of student success, measures of institutional success, compliance metrics, and measures of learning. In general, respondents expressed a desire for the NWCCU Standards to focus more upon student success than upon issues of capacity, governance, or resources (a significant portion of current efforts and reporting). A response that captures the consensus of comments on the survey is as follows:

“The Standards should enable institutions to reflect on their successes and identify areas of improvement in the core functions required to enable student access and student success across the operations and organizational structure of the College. The Standards should support the institutions articulation of its core values, goals, strategic direction, and assessment protocols.”

In reviewing comments from stakeholders at town halls and the NWCCU Annual Meeting, there was consensus on the idea of revising the Standards and Eligibility Requirements to elevate Student Learning and Student Achievement to pre-eminence in a single standard and placing compliance, resources, and governance items in a separate standard with separate reporting requirements (such as a “desk audit” or “offsite review” aligned with the current Mid-Cycle Report). Respondents felt that a revision to the Standards and processes of accreditation that focused more upon student learning and student achievement would provide significantly greater value to institutions.

Respondents were asked whether the Standards should require institutions to focus on common student outcomes (such as critical thinking, problem solving, quantitative reasoning, verbal and
written communication, information literacy, professionalism, etc.). Respondents were divided in their support (49% expressed support while 39% expressed lack of support). One hundred and twelve respondents provided additional comments. The comments were in favor of moving decisions of accreditation to the achievement of institutional success in promoting the achievement of student learning, but lack of support for prescribed variables or measurement tools that might fail to account for the diversity of NWCCU institutions and students.

![Pie chart showing survey results]

In analyzing the additional comments from stakeholders, comments were extremely supportive for a more defined set of requirements for institutional assessment activities and educational opportunities to establish more clearly understood expectations across institutions. A common theme to feedback was a need to establish a system of accreditation that can provide respect and freedom for institutional mission and culture while at the same time creating a comprehensive system of measurement and assessment that can promote and share student success while driving continuous quality improvement through the accreditation cycle. One respondent shared:

“The standards should specify and differentiate between student achievement data and learning outcomes. Language that supports the goals of learning or education, if indeed accreditation is about educational excellence, should be consistently branded around excellence in education. If standards are not relevant to this mission or consistent, they should not be included. Best practices

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1 The Standards should require institutions to focus on common student outcomes (critical thinking, problem solving, quantitative reasoning, verbal and written communication, information literacy, professionalism, etc.).
should be written into the standards rather than relying on assumptions of best practice and reviewed for continued best practice.”

Respondents expressed strong or moderate disagreement over the idea of a creation of minimum thresholds for graduation, completion, retention, and loan default rates (54% compared to 32% who supported the creation of thresholds). Eighty-three respondents offered additional comments that expressed concern over the idea of “bright lines” or other metrics that fail to serve as accurate representations of institutional performance. Many comments centered around the open-access nature of institutions and the negative consequences in recruitment and admissions that could come from efforts that measure variables not directly tied to the quality of learning and instruction at the institution.

Comments from stakeholders were similarly divided in their support for the idea of thresholds, feeling that identifying measurements that could be meaningful across institutional sizes and types would be impossible, and particularly troubling for institutions with “open access” missions who measure success in significantly different ways than a graduate research institution. Feedback in support of the idea of thresholds centered around the value for comparison across institutions of same type and as a response to calls for additional oversight and transparency from federal regulators and the public. Significant positive feedback from stakeholders in town halls centered on the idea of allowing institutions to establish their own thresholds of success around key measures such as retention, graduation, completion, and transfer using data from self-identified regional and peer institutions.

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2 The Standards should establish minimum thresholds for graduation, completion, retention, and loan default rates.
Survey participants were asked how often and in what ways should NWCCU engage with institutions to assure institutional success.

One hundred and twenty-two survey respondents shared open-ended feedback regarding the ways in which NWCCU could assure or support institutional success. There was *broad support for the seven-year cycle of accreditation and the current structure of reporting at Year One, Year Five, and Year Seven*. Some additional considerations were the *creation of an off-site review*, *creating additional educational programming*, *expanding visits to the institution by NWCCU Staff or Commissioners prior to Evaluation Committee*, *tailoring of teams and team sizes to institutional size and mission*, *additional education and training in assessment*, and *to serve as a repository of best practices that can be shared throughout the region*.

Survey participants were asked what technology should be adopted and provided to support the ongoing monitoring of institutions and to help assure transparency and institutional success. One hundred and twenty-two survey respondents shared open-ended feedback. The most common response was appreciation for the redesigned NWCCU website but with the request that additional information and resources are provided through that medium. Respondents suggested *cloud-based data sharing repositories*, *online materials for Evaluation Committees*, *online webinars*, and *a dashboard to share institutional results around student achievement*. 
Efficiency and Effectiveness
Respondents were asked to broadly comment on whether the current structure of visits and reporting sufficient, onerous, or optimal? Seventy-eight percent expressed that the structure was either sufficient or optimal, compared with twenty-two percent who felt that the current structure of visits was onerous.

![Pie chart showing responses to the question about the sufficiency of the current structure of visits and reporting. The chart indicates that 65.03% of responses were for sufficient, 22.09% for onerous, and 12.88% for optimal.]

Comments in support of a structure that would be less onerous and centered around the idea of interactions between institutions and NWCCU that were less formal but more meaningful. A model comment from this perspective follows:

“Valuable engagement may be more achievable when conducted more often, but less formal. A lot of energy goes into preparing an institution for an accreditation visit, report etc. If the model was slightly augmented to include a constant conversation (annual or even semi-annual) so that an institution can highlight achievements and express concerns regarding areas that may need improvement, everyone would be more engaged in the process. In this model, the NWCCU and institution would recognize potential pitfalls early on and can provide assistance (from a peer institution) to help achieve the desired goals.”
Respondents were asked whether the Core Themes should a central part of the Standards. Sixty-eight percent expressed strong or moderate agreement compared with 22% expressing strong or moderate disagreement).³

In town hall conversations and subsequent public comments, it was clear that while Core Themes are generally understood and accepted, there is a significant portion of institutions who remain either unclear or unsupportive of the requirement. One comment offers some insight:

“Having participated in many visits, I am torn on this question. On the one hand, the core themes force institutions to hone in on what they most want to accomplish and provide a good road map for evaluators. On the other hand, I have witnessed little originality in the core themes. From my experience, they fail to delineate what is DISTINCTIVE about each institution.”

A significant number of respondents support the idea of creating meaningful indicators but would prefer that institutions be allowed greater freedom in establishing those as a reflection of mission, rather than of core themes. An example of such a comment includes the following:

“The language of "Core Themes" does not align optimally with the language and goal structuring of strategic plans--or other ways that academic institutions describe their work.”

³ The Core Themes are valuable and they should remain a central part of the Standards.
Respondents expressed broad support for the notion of an off-site review for federal compliance items. Sixty-percent expressed strong or moderate agreement, while 36% expressed lack of support or strong lack of support for the idea.\(^4\)

Forty-two respondents offered additional comments which were almost universally supportive. Representative feedback included the following:

“Federal compliance is often changing, so keeping them in the normal cycle is disruptive and causes inappropriate comparisons to be made between institutions.”

“There are so many items that comprise a visit; a brief report (template) to demonstrate federal compliance status would be helpful.”

“I have experience with HLC, and having a separate federal compliance report helps both the institutions and the review team. As part of a team, I was responsible just for the onsite work. The federal compliance report was reviewed ahead of time by an off-site team, which allowed us to follow up on anything they saw as weak or an area of potential trouble.”

\(^4\) Federal compliance items (such as those on the NWCCU Standard Two Checklist) should be separated into an offsite review or separate report.)
Respondents were asked what data should be collected to support ongoing monitoring (such as annual reports or special reports) and engagement to assure transparency and institutional success. Respondents expressed support for the collection of data on graduation (71%), retention (72%), and completion (67%) – with less support for the collection of data on transfers (46%).

Risk-Based Accreditation and Alternative Pathways
Survey respondents supported the creation of an alternative pathway to reaffirmation for institutions that demonstrate high performance in student achievement, student learning, and compliance. Fifty-five percent of respondents expressed agreement, compared with 21% of respondents expressing disagreement, and 23% expressing no opinion.5

5 There should be alternative pathways to reaffirmation for institutions that have demonstrated high performance in student achievement, student learning, and compliance with the Standards in previous cycles.
Stakeholders were supportive of the idea that all institutions should be evaluated by the same Standards, but that varying levels of follow-up and additional monitoring should be required based upon institutional performance. The challenge, as expressed by many stakeholders, was defining “high-performing” institutions with measures that are appropriate to their mission and comparable to like-institutions in terms of size, complexity, and mission.

Respondents were mixed in their support of the notion of common standards across institutional types, sizes, and complexities. Thirty-three percent of respondents felt that there should be a common set of standards regardless of size or complexity, while 46% of respondents expressed support for the idea of a separate set of standards for classes of similar institutions. 155 respondents provided additional feedback, which expressed broad support for the notion of some

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Should Standards be common to all institutions, regardless of size and complexity, or should there be separate Standards for classes of similar institutions?
form of risk-based accreditation, provided that the basis for the decision was fair, clear, and based upon reliable and valid data related to institutional performance.

Respondents at town halls and the NWCCU Annual Meeting expressed strong support for the idea of a common set of Standards, but with the addition of institutionally defined metrics that could be used for national and regional comparison. Comments that supported that trajectory included:

“While there should be "class standards" held in common with all institutions in a class, there should be institutionally defined standards that are unique to the institution.”

“There should be separate standards for classes of similar institutions…”
Transparency
Survey participants and stakeholders were asked how data should be shared with the public and institutions to support NWCCU’s mission and demonstrate institutional mission fulfillment. In its 2018 NWCCU Task Force Survey, NWCCU found support for the publication of commission action letters to address increased calls for transparency and accountability by the United States Department of Education, the public, and CHEA. In that survey, 66% indicated support leading to the Commission’s decision to make future Commission Action Letters public beginning January 1, 2019. Respondents to the 2018-2019 Standards and Eligibility Requirements Revision offered broad support for the sharing of institutional data being used to evaluate a respondent’s own institution (93%), limited support the creation of a common set of achievement benchmarks for public dissemination (48%), and less support for the distribution of Commission Action Letters to the public (42%).

Comments from 162 respondents generally supported the role of transparency in the accreditation process, but a general concern for the quality of federal data and validity of existing measures and their use as a primary data-point for decision-making around accreditation was present. There was consensus for the notion that “good” data should be made available, and that accountability required some level of public disclosure.

In town halls and at the NWCCU Annual Meeting, there was enthusiastic support for the creation of model Commission Action Letters and the creation of model reports for institutions. Stakeholders from public institutions universally shared that their reports and Commission Action Letters were already made available to the public through their own websites. As with feedback from other questions, stakeholders support the notion of transparency provided there is consistency, clarity, and quality in terms of data and evaluation criteria.
**Text Analysis**

Text analysis of survey respondent comments was conducted by an outside consulting firm, Kai Analytics. The analysis helped frame the context of the report and model answers using statistical methods to identify themes or sentiment not found in the quantitative section. Sentiment analysis help us quickly categorize comments into negative, neutral, positive. Particular areas of common focus and response included: *transparency, redundancy, core themes, student achievement, learning, and outcomes*. These common areas of focus helped guide the selection of model responses in the report.

![Chart showing sentiment analysis results](image)

**Conclusions and Next Steps**

The 2018-2019 Standards and Eligibility Requirements Revision process includes a comprehensive process for engagement, feedback, conversation, and critical reflection. The feedback from stakeholders in the online survey, town halls, public comment period, and NWCCU Annual meeting have been reviewed by the NWCCU Bylaws, Standards, and Policies Committee who made a recommendation to the Commission in January 2019 for revisions to Standards, Policies, Eligibility Requirements, and processes.

The Committee provided direction to NWCCU Staff that any changes to Standards, Eligibility Requirements, policies, or processes be clear, transparent, fair, equitable, flexible, and recognizing of institutional differences in terms of risk, performance, culture, and mission.

In addition to the Standards and Eligibility Requirements, the Committee has provided a set of directives (*in italics below*) to accompany the public comment and revisions prior to a January 1, 2020 launch. These include:

*The creation of an offsite compliance review as part the Mid-Cycle report.* This would be a review using a peer-review team (two to three evaluators with appropriate expertise) who would meet collectively to review multiple institutions’ compliance requirements and provide a report to the Commission and the institution; if warranted, the team could request the opportunity to make site visits for on-campus review of their findings. This report would become part of the Mid-
Cycle report, and any issues identified would be addressed in the Year Seven comprehensive evaluation.

*Assignment of future Year Seven Evaluation Committees that focus on the areas of student learning, student achievement, institutional effectiveness, and any issues identified in the Mid-Cycle Report.* The Year Seven Evaluation Committee would conduct an on-site review and comprise three to five Evaluators, depending upon institutional mission and the number of issues identified in the Mid-Cycle report.

*Reducing institutional burden on annual reporting by implementing a system that utilizes other datasets (such as IPEDS and the Student Clearinghouse) in lieu of direct institutional reporting on an annual basis.* The Committee further supports a streamlined annual report (with a template) that would ask institutions to report briefly on updates to the institution’s outstanding recommendations from prior reports.

*Creation of a region-wide dataset to support institutional success, analysis, and continuous quality improvement.*

*Creation of a risk-based process of ongoing institutional accreditation and reporting.*

*Creation of additional educational programming and services to support the implementation of the new Standards, and systems that promote a culture of learning and continuous peer-based improvement throughout the region.*

*Creation of specialized evaluator training to support the implementation of the 2020 Standards, Eligibility Requirements, and Policies.*

*Creation of an Accreditation Handbook to accompany the standards to showcase model reports, useful dashboards, and templates to further promote consistency and clarity within the reports.*

*Creation of a system that gives institutions the opportunity to utilize EITHER core themes or other measures of institutional mission fulfillment that best serves the institution’s own framework.*

The Commission is issuing a first draft in of the 2020 Standards and Eligibility Requirements in February 2019 and asks for additional public comment before conducting a second review of proposed Standards, Policies, Eligibility Requirements, and processes.

A second public comment period will take place in July 2019 before final vote by the Commission and Membership in August 2019. Any changes will be made public and supported with educational programming by the NWCCU staff. Institutions participating in a Year Seven visit in 2020 or 2021 will be given the opportunity to demonstrate compliance with the 2010 Standards and Eligibility Requirements or the 2020 Standards and Eligibility Requirements.

From the feedback received from stakeholders, it is clear that NWCCU must continue to evolve its own processes to align with its mission: to assure educational quality, enhance institutional effectiveness and foster continuous improvement of colleges and universities in the Northwest
region. It is critical to create Standards, Policies, Eligibility Requirements, and processes that place student learning and student achievement at the forefront; reduce the institutional burdens of reporting and visits; simplify language and requirements to support institutional success; create educational programming and resources to provide consistency and clarity; and build technology around the interactions with institutions, the public, and Evaluation Committees to streamline efforts and share institutional accomplishments.

The Northwest Commission on Colleges and Universities Commissioners and staff look forward to analyzing the current processes around NWCCU’s accreditation activities (including the cycle of evaluation and the methods of evaluation) in order to make changes for the future that support these and other continuous quality improvement efforts.
Frequently Asked Questions

1. Why is NWCCU revising its Standards and Eligibility Requirements?

The NWCU Bylaws, federal law, USDE regulations require a regular and ongoing cycle of evaluation (and a comprehensive review no later than every eight years). In addition to these requirements, NWCCU has undertaken a strategic review of its mission and value to member organizations and hopes to align its Standards, Eligibility Requirements, policies, and practices with a mission to accredit our members “by applying evidence-informed standards and processes to support continuous improvements that promote student achievement and success.”

Within the proposed Strategic Pathways document for the agency is a goal to “Implement accreditation standards and institutional review processes requiring institutions to demonstrate conclusive outcomes of student achievement and success and to assure overall institutional quality” and to” Provide guidance and policies to encourage responsible institutional innovation and experimentation.”

Over the past year, President Ramaswamy and the Commission have called for accreditation Standards, Eligibility Requirements, policies, and practices that promote institutional success, reduce institutional reporting burdens, and foster the success of students. The revised Standards and Eligibility Requirements are designed to align future requirements with federal law and USDE regulation, and to focus the work of Evaluation Committees around the primary focus of our member institutions: Student Learning and Student Achievement.

2. What’s the difference between Student Learning and Student Achievement?

Student achievement is a measure of a learner’s attainment or persistence toward a program, credential, or post-graduation outcome. Student achievement includes graduation, retention, satisfactory academic progress, licensure passage rates, and employment outcomes.

Student Learning is a measure of a learner’s ability to demonstrate established outcomes or competencies within a course, program, certificate, or degree. The evidence of learning can and should include both direct and indirect measures.

3. My institution is scheduled for a report or visit within the next three years. What will happen to us?

The 2020 Accreditation Standards and Eligibility Requirements will take effect January 1, 2020. Institutions will have the opportunity to complete Mission Fulfillment and Sustainability Reports utilizing EITHER the 2012 Accreditation Standards and Eligibility Requirements or the 2020 Accreditation Standards and Eligibility Requirements through January 1, 2022. Recommendations for compliance or improvement that are carried over from prior reports should be addressed in all future reports unless otherwise directed. Please contact your NWCCU Staff Liaison to discuss transition options and logistics.
4. Does NWCCU intend to revisit its requirements around Credit for Prior Learning?

Yes! NWCCU is currently revising its policy on Credit for Prior Learning and will launch the new requirements in January 1, 2020 along with the 2020 Accreditation Standards and Eligibility Requirements. The current draft of the policy does away with the 25% threshold in favor of higher education and institutional best practices around credit for prior learning.

5. The 2020 Accreditation Standards and Eligibility Requirements are much shorter. What happens to the additional requirements?

NWCCU has attempted to reduce redundancies (particularly around planning), align its Standards with USDE regulations, and create plain-language Standards that can be broadly applied across a diversity of institutional types. If an item wasn’t required by USDE or critical to the demonstration or support of Student Achievement or Student Success, it was removed from the 2020 Accreditation Standards and Eligibility Requirements. An Accreditation Handbook will be published in Summer 2019 providing examples, rubrics, and guidance on the application of the 2020 Accreditation Standards and Eligibility Requirements. The Commission’s hope is to reduce ambiguity and to promote clarity and transparency.

6. The 2020 Accreditation Standards and Eligibility Requirements reference Core Competencies. Are these required?

NWCCU will not mandate the use of any particular core theme, core competency, or general education requirement but asks all institutions to measure the improvement of critical core competencies that result in expansion of students’ critical and soft skills.

7. Is NWCCU utilizing “bright lines” or “benchmarks” to make accreditation decisions?

No. NWCCU asks institutions to provide data related to mission fulfillment, and to compare those results to peer institutions both within the region and outside the region. The institution will identify its own peer institutions and measures of student learning, student achievement, and mission fulfillment – asking that the institution thoughtfully evaluate its peer institutions and consistent in its marketing and publications about the meaningful measures it selects and to create aspirational benchmarks to drive continuous quality improvement.

8. How will NWCCU support the transition to the 2020 Accreditation Standards and Eligibility Requirements?

Beginning in September 2019, the Commission Staff will host a series of online trainings for institutions and online and in person training for evaluators. Additionally, the 2019 Annual Conference will feature sessions on applying and transitioning to the 2020 Accreditation Standards and Eligibility Requirements. Finally, all institutions will have ongoing access and support through their NWCCU staff liaisons. A calendar of synchronous online and in person trainings will be issued in Summer 2019, and asynchronous online trainings will be available through the NWCCU website in Fall 2019.