

# Alternative Accreditation Process Proposed

By Don Sutherland

On September 30, Senators Bennet and Rubio introduced legislation aimed at creating an alternative accreditation mechanism. [S.2111](#), the “Higher Education Innovation Act,” seeks “to establish an alternative, outcomes-based process for authorizing innovative high-quality higher education providers” to participate in Title IV programs. Title IV programs include federal Pell Grants, supplemental educational opportunity grants, federal assistance to state financial aid programs, and assistance to colleges and universities.

Although it remains to be seen whether this legislation will be incorporated into the larger process to reauthorize the Higher Education Act, it provides a glimpse of policy changes that could have future implications for accreditation and assessment. The legislation considers a range of metrics related to student performance, program benefits, and affordability.

Under the proposed legislation, “innovation authorizers” would be approved by the Secretary of Education. Those entities would have jurisdiction over institutions of higher education, which would constitute any entity that, among other things provides an “educational program” comprised of course bundles, leads to a degree/certificate or industry-recognized credential. The legislation defines a “course bundle” as “a series of courses, or the equivalent, that lead to proficiency in a set of marketable skills or competencies” or “an industry-recognized credential that meets the requirements for licensing in the relevant field.” In other words, higher education institutions would be permitted to expand beyond degree programs and certificates. The institution would agree to “outcome-based oversight” and would meet or exceed “minimum thresholds” for performance metrics that would be established by the “innovation authorizer.”

Performance metrics would fall into three major categories: (1) student learning; (2) completion of degrees, certificates, or course bundles; and, (3) benefit to students and affordability. Each institution would be expected to meet or exceed the 60th-percentile student outcome for the performance metrics. Student learning would be assessed, in part, based on evaluation criteria established by the Institute of Education Sciences’ [“What Works Clearinghouse.”](#) Assessment would focus on pass rates and outcomes of qualifying or licensing exams. Completion would be measured based on 100%, 150%, and 200% of the “normal time” for the completion of each program. The benefit to students and affordability would be evaluated based on rates of employment or enrollment in graduate school, increases in income for students, tuition and fees for the institution, the net price disaggregated by income quintile and educational program, median total loan debt accrued by students enrolled in the institution, student loan repayment rates, and median income of students enrolled in the institution.

Authorization of an institution by one of the “innovation authorizers” would be deemed to be the equivalent of “recognized accreditation” for purposes of Title IV funding. Colleges and universities could be accredited by a national and/or regional accrediting body, an “innovation authorizer,” or both.

In sum, this legislation seeks to expand the pool of bodies that evaluate colleges and universities under Title IV and it seems to lay the early groundwork for criteria against which higher education institutions will be evaluated.