

Accountability and Program Integrity

Maintaining the nation's system of top quality higher education relies upon ensuring the integrity of participating institutions as well as the integrity and accountability of the Higher Education Act's gatekeeping system of federal recognition, accreditation and state licensure policies. At their own institutions, AACRAO members protect academic integrity by serving as admissions gatekeepers and as codifiers and enforcers of institutional academic policies that govern the awarding of credits and credentials. They also monitor threats to academic integrity across the spectrum of educational institutions, since they must make decisions based upon credits and credentials given to students by their high schools and previously attended colleges and universities. AACRAO is alarmed by threats to the reputation and integrity of all academic institutions posed by the rise of "diploma mills" and instances of uneven and lax standards for accreditation and state licensure.

Federal recognition –

AACRAO recognizes the responsibility of higher education to strengthen its own oversight and accountability and supports changes to the accreditation process and state licensure.

Overall, federal law can be most effective by focusing upon business practices in higher education rather than academic policies. Such areas may include:

- Requirements for diversification of funding sources to decrease reliance on federal resources
- Restrictions on excessive uses of federal funds for marketing, advertising, and recruitment activities relative to student services and faculty instruction
- Stricter requirements for language promoting programs that lead to licensed careers, including sanctions for misrepresentation of programmatic accreditation

Accreditation –

Academic freedom, institutional autonomy, and federal non-intervention in the academic affairs of colleges and universities are paramount to their ability to fulfill their missions of teaching and learning, research, and service. AACRAO is committed to institutions' ability to regulate their academic affairs without governmental interference. Thus, the accreditation process, based on institutional peer review, remains the best mechanism for quality assurance.

At the same time, AACRAO recognizes that documented shortcomings of the current system have resulted in growing public distrust of accreditation and calls for a complete "federalization" of the program integrity system. With billions of federal dollars and public trust at stake, it is critical that good stewards within the higher education community, who are by far in the majority, act in concert to reform and thus save non-governmental accreditation as a reliable, trustworthy, and effective mechanism for quality assurance. Elements of a plan to restore public trust would include such commonsense reforms as:

- Elimination of conflicts of interests for individuals serving as employees and volunteers with recognized accrediting bodies or appointees to the National Advisory Committee on Institutional Quality and Integrity (NACIQI),

- Creation of minimum standards of administrative capability and financial responsibility for recognized accrediting bodies, and
- Imposition of risk-sharing on accrediting bodies for losses attributable to their gross negligence or direct culpability for incidents of institutional malpractice.

AACRAO further urges that accrediting standards be connected to verifiable outcomes where practicable.

State licensure –

While state licensure, as a critical element in the Higher Education Act’s triad, is designed to be a key protector of the integrity of Title IV programs, in reality the success of licensure varies greatly from state to state. Some states have devoted significant resources and attention to this responsibility. In others, licensure essentially involves the filing of paperwork. The result is a regulatory environment in some states that invites fraud and abuse, as Congressional hearings and other investigations have documented. For the protection of students and taxpayers, AACRAO supports substantive state licensure programs with oversight and consumer protection activities appropriate to the level of risk. Such alternative state regulatory frameworks, if designed carefully, can indeed be more robust and effective in rooting out fraudulent or predatory practices while, at the same time, providing compliance relief to legitimate institutions.

State authorization—

The rapid growth of distance education has further contributed to confusion regarding state licensing. A literal reading of Title IV indicates that institutions must get a license in every state where they may be delivering on-line educational services, even to one student. AACRAO endorses the concept of legislation ending this unworkable statutory requirement. At the same time, the current system warrants further examination. Some predatory institutions, seeking to evade the more robust licensure requirements of some states, have set up operations in states with the weakest licensure requirements and have been conducting business nationwide from these locations. These institutions often enroll the majority of students outside the state in which they are licensed, assuming that state authorities will be unlikely to expend local resources to protect the interests of students from other states.

Credit transfer –

In an era where increasing numbers of students transfer at least once in their college careers, AACRAO supports college and university faculty-led initiatives to examine and improve the transfer process. However, attempts in recent years to impose federal rules governing the transfer of credits are ill-conceived and threaten to make what should be a collegial process into a political one. Many of these efforts have originated with career colleges that have accused traditional colleges of bias in refusing to award academic credit for what they claim is equivalent coursework. Academic judgment about equivalency of coursework from one institution to another must rightly be kept within academic institutions and governmental non-interference in such decisions should be preserved.

Diploma mills and credential fraud –

The number of diploma mills – from fake “high schools” to “doctoral” institutions – has risen dramatically in the past decade, resulting in a proliferation of claims of educational

attainment based upon fraudulent and questionable credentials. Credential fraud is a multibillion dollar industry, including sophisticated crime rings that provide transcripts and call centers to verify records and graduation information.

This fraud and abuse has become a significant international threat to the health and safety of individuals and a tremendous financial burden on colleges and universities as well as to employers and government. AACRAO members, as consumers and guardians of academic credentials, are at the forefront of the global fight against diploma mills and credential fraud and have been devoting ever-greater resources to its detection and eradication.

AACRAO supports international efforts to combat diploma mills and credential fraud, actively partnering with federal agencies, international counterparts, foreign ministries of education, and law enforcement to identify and expose it. It also advocates for improvements to federal laws and administrative practices relating to credential fraud, including:

- Better information gathering about diploma mills and regulation of the credential evaluation field
- Additional oversight of partnerships between U.S. institutions and foreign partners.