

**Stig Leschly
Yazmin Guzman**

**Harvard Business School
College101**

Spring 2022



Oversight of Academic Quality and Student Outcomes by Accreditors of US Higher Education

Evidence from the Database of Accredited Postsecondary Institutions and Programs

UNPUBLISHED DRAFT
DO NOT DISTRIBUTE WITHOUT PERMISSION

About the Authors

Stig Leschly. Stig is a Senior Lecturer at Harvard Business School (HBS) where he is a long-time faculty member in the Entrepreneurial Management unit. At HBS, Stig teaches and writes about entrepreneurship and about higher education policy and practice. Apart from his work as an academic, Stig is a practicing entrepreneur. He is the CEO of College101, a non-profit advocacy and research organization focused on US higher education. Formerly, Stig was the CEO of Match Education, an education-related nonprofit that runs charter schools and trains teachers. Early in his career, Stig was a high-tech entrepreneur and an executive at Amazon.com. He is also the co-founder and board chair of Duet.org, a hybrid college that operates in partnership with Southern New Hampshire University. Stig has a JD-MBA from Harvard and BA from Princeton.

Yazmin Guzman. Yazmin is a researcher and data analyst with College101. She has a BA in Urban Studies from MIT and a MA in Educational Research from the University of Cambridge, Cambridge, UK.



Table of Contents



1. Executive Summary	4
2. Overview of Accreditation	6
3. Data Source	6
4. Sample Selection	8
5. Methodology: Identifying Quality-related Disciplinary Actions	9
6. Error and Limitation	11
7. Major Finding	12
8. Secondary Findings (1 - 7)	13
9. Conclusion	24
Appendix 1: Methodology	25
Appendix 2: Profiles of Selected Regional Accreditors	28
Endnotes	32

1. Executive Summary

College accreditors play a prominent and powerful role in US higher education. Federal law vests legal authority in accreditors to approve colleges for federal financial aid, and it openly tasks accreditors with monitoring college quality and with helping colleges to improve.

Despite their powerful position as private gatekeepers of public aid for colleges and as regulators of college quality, accreditors are rarely studied rigorously. Little is known empirically about their behavior or effectiveness. The seven regional accreditors, which oversee 95% of US college students, are particularly under-researched by outside parties.

In this paper, we examine the activities of US college accreditors by analyzing the Database of Accredited Postsecondary Institutions and Programs (DAPIP). DAPIP is maintained by the US Department of Education and, to our knowledge, is the only publicly available, large dataset on the activities of US college accreditors. DAPIP houses information on regulatory actions taken by accreditors toward colleges. Its records date back decades and involve almost all US colleges and accreditors.

We specifically analyze 31,699 entries in DAPIP, each of which pertains to a specific oversight action taken by an accreditor towards a college between 2012 and 2021. In analyzing these DAPIP records, we focus on three research questions:

Research Question 1: How often did accreditors take action to discipline colleges for low-quality academic programming or poor student outcomes?

Research Question 2: Which types of colleges were most likely to experience disciplinary action from an accreditor for sub-par student outcomes (as measured by graduation rates, student earnings, and loan default rates) or poor academic programming?

Research Question 3: Which types of accreditors were most likely to discipline colleges for worrisome academic quality or student outcomes?

In this paper, we use the term “regional accreditors” to refer to the seven accreditors that oversee colleges serving 95% of US college students and that historically have accredited colleges in a specific region of the US. Under recent US Department of Education guidelines, these accreditors are no longer limited to accrediting colleges in their traditional regions. Also, in this report, we use synonymously “postsecondary institutions,” “colleges,” “universities” and “schools.”

Our main findings are as follows:

- Of the 31,699 accretor actions that we analyze, all of which occurred between 2012 and 2021, only 2.7% were ones in which an accretor disciplined or sanctioned a college for inadequate student outcomes or low-quality academic programming. The other 97.3% of formal oversight activity by accretors was supportive of colleges or focused on non-academic matters (governance, finances, general compliance, etc.).
- Low graduation rates, high loan default rates, and low median student earnings did not increase the likelihood that an accretor would take disciplinary action towards a college.
- Only 564 (11%) of the 5,195 colleges in our sample experienced one or more disciplinary actions related to student outcomes or academic program quality from an accretor. Sixty-four percent (64%) of these institutions were small certificate-granting institutions, mainly beauty and barber schools, overseen by national accretors.
- Colleges in our sample receive approximately \$112 billion annually in federal financial aid under Title IV of the Higher Education Act, and 90% of this funding supports colleges that experienced no disciplinary action related to academic quality or student outcomes between 2012 and 2021.
- The seven regional accretors that oversee 95% of US college students and 68% of 2-year and 4-year colleges were particularly unlikely to sanction colleges for objectionable student outcomes or academic programming.
 - Regional accretors accounted for 11,103 actions in our sample (35%), and only 107 (1%) of their actions disciplined a college for sub-par student outcomes or low-grade academic offerings.
 - Only 2% of the 13.9 million students overseen by regional accretors attend colleges that were disciplined between 2012 and 2021 by their regional accretors for poor academic quality or low student outcomes.

This paper opens with a short account of college accreditation in the US and with an explanation of our data source, sample selection and research method. It closes with our findings. Appendices detail our research method and profile selected regional accretors.

We do not make recommendations in this report. We share our analysis and findings to inform and encourage debate on new approaches to accreditation policy and practice.

2. Overview of Accreditation

Accreditors arose in the early 20th century as voluntary membership and trade associations of postsecondary institutions. In this period, accreditors operated privately for the benefit of their members and with no formal role in higher education policy or finance.

In the early 1950s, the Servicemen's Readjustment Act (the "GI Bill") vested legal authority in accreditors to evaluate and approve postsecondary institutions for federal financial aid. Accreditors' legal role as gatekeepers of public aid for higher education expanded rapidly and significantly with the passage of Higher Education Act (HEA) in 1965 and with the large increase in higher education funding that accompanied the HEA.

Since the passage of the HEA in 1965, American colleges can accept federal financial aid (or qualify for most forms of state-level funding for higher education) only if they are in good standing with an accreditor recognized by the US Department of Education.

Accreditation surveys all aspects of the design and operation of postsecondary institutions (financial viability, faculty composition, academic programming, governance, etc.). Accreditation is usually structured as a self-study process in which colleges evaluate their own progress and with a peer-review component in which colleges are vetted by staff from other colleges. Colleges typically must seek re-accreditation every 5-10 years. Accreditors are governed mainly by delegates from the colleges they oversee and are funded primarily by fees collected from their member colleges.

The US Department of Education currently recognizes 60 accreditors. Forty-five of these accreditors – including the seven regional accreditors -- grant institutional accreditation, which allows postsecondary institutions to qualify for public aid. The other 15 accreditors are primarily programmatic accreditors that review programs in a particular field (law, dentistry, architecture, etc.).

3. Data Source

Our primary source of data in this report is the Database of Accredited Postsecondary Institutions and Programs (DAPIP). The US Department of Education maintains DAPIP. To our knowledge, DAPIP is the only publicly available, large data set on the behavior of US accreditors.

At the time of our analysis, DAPIP contained 39,456 records. Each DAPIP record describes a specific oversight action taken by an accreditor towards an institution. DAPIP has data on accreditor actions from 1998 to 2021. Each DAPIP record on an accreditor action contains the following information:

- **Basic Information on Action.** Each action is marked by the accreditor that took the action, the date that the accreditor took the action, and the college that received the action.
- **Description of Action.** Each action is classified with one of 39 pre-set, high-level descriptions. These 39 descriptors are established by the US Department of Education.
- **Justification for Action.** Each action is tagged with one of 11 second-level justifications. These 11 justifications are also fixed by the US Department of Education. One of them is a catch-all “other” justification into which an accreditor can enter a text field that explains the action.

The following exhibit lists in alphabetical order the 39 descriptions and 11 justifications into which all accreditor actions are classified in DAPIP.

Exhibit 1

DAPIP Classifications for Descriptions and Justifications for Accreditor Actions

Accreditor Action Descriptions (39)

Accreditation Reaffirmed: Warning Removed	Institution Closed
Accreditation Reaffirmed: Probation Removed	Loss of Accreditation or Preaccreditation: Denial
Accreditation Reinstated: Termination Overturned on Appeal	Loss of Accreditation or Preaccreditation: Lapse
Additional Location Closed	Loss of Accreditation or Preaccreditation: Other
Affirm Denial Following Appeal	Loss of Accreditation or Preaccreditation: Voluntary Withdrawal
Agency no longer recognized	Probation or Equivalent or a More Severe Status: Other
Approved for Distance Education	Probation or Equivalent or a More Severe Status: Probation
Change in Agency recognition	Probation or Equivalent or a More Severe Status: Show Cause
Deny Substantive Change: Degree	Probation or Equivalent or a More Severe Status: Warning
Deny Substantive Change: Final Branch Approval	Probation or Equivalent or More Severe Status: Monitoring
Deny Substantive Change: Other	Program Merged Into Institutional Accreditation
Deny Substantive Change: Ownership	Removal of Approval for Correspondence Education
Deny Substantive Change: Program	Removal of Approval for Distance Education
Grant Substantive Change: Degree	Removal of Monitoring Status
Grant Substantive Change: Final Branch Approval	Removal of Show Cause Status
Grant Substantive Change: Other	Renewal of Accreditation
Grant Substantive Change: Ownership	Stay Denial Pending Appeal
Grant Substantive Change: Program	Voluntary Withdrawal Received
Heightened Monitoring or Focused Review	Warning or Equivalent-Factors Affecting Academic Quality
Initial Accreditation	

Accreditor Action Justifications (11)

Additional oversight is required to ensure a resolution of compliance issues	Other - Provide unlisted or multiple justifications
Concerns about issues affecting academic quality	Significantly out of compliance - fiscal and administrative capacity
Concerns about title IV, HEA responsibilities/ potential fraud or abuse	Significantly out of compliance - recruiting and admissions practices
Fails to meet agency standards for initial or renewed accreditation	Significantly out of compliance - student achievement
Has satisfactorily addressed all compliance concerns from previous actions	Significantly out of compliance - title IV, HEA responsibilities
Is in compliance with all of the agency's accreditation standards	

As we explain in the methodology section below, our analysis takes advantage of the information contained in DAPIP's description and justification fields for accreditor actions. These data fields allow us to estimate the sub-set of accreditor actions that were disciplinary in nature and focused on poor academic programming or low student outcomes.

4. Sample Selection

Of the 39,456 accreditor actions recorded in DAPIP, we analyze 31,699 (80%). We exclude 20% of accreditor actions in DAPIP from our analysis for four reasons:

- **Exclusion 1: Accreditor Actions from 1998 to 2011.** We ignore 536 records that describe accreditor actions from 1998 to 2011. DAPIP data in these years are thin. We focus instead on accreditor actions from 2012 to 2021, which constitute 99% of the entries in DAPIP.
- **Exclusion 2: Accreditor Actions Directed at Graduate Schools.** We do not analyze 1,134 records that describe accreditor actions directed at graduate schools or, in a few cases, at postsecondary institutions where DAPIP supplies no data on an institution's predominant degree.
- **Exclusion 3: Accreditor Actions Directed at Non-educational Institutions.** We ignore 4,244 records in which an accreditor took action towards a hospital, a research institute, or another institution that is not classified as a college by the US Department of Education.
- **Exclusion 4: Accreditor Actions Directed at Postsecondary Institutions with no Match in the College Scorecard Database.** We do not analyze 1,843 records where we could not match the college listed in DAPIP with that college's associated data file in the US Department of Education's College Scorecard database. The College Scorecard is our source for college-specific data on enrollment, graduation rates, loan default rates, earnings outcomes, and Title IV receipts.

Of the 60 accreditors currently recognized by the US Department of Education, 56 accreditors appear in our sample as having taken at least one action between 2012 and 2021. Moreover, our sample features 5,195 colleges that have experienced at least one accreditor action. The colleges that appear in our sample represent 88% of colleges currently tracked by the US Department of Education in the College Scorecard database.

5. Methodology: Identifying Quality-Related Disciplinary Actions

As mentioned, at the core of our analysis, we seek to identify accreditor actions between 2012 and 2021 in which an accreditor sanctioned or disciplined a college – or began to move formally in that direction – because of a concern over the quality of academic programming or student outcomes in a college. We call these actions “quality-related disciplinary actions” (QDAs).

In our sample of 31,699 accreditor actions, we identify 853 actions that qualify as quality-related disciplinary actions. To isolate these 853 quality-related disciplinary actions, we apply three filters, as follows.

- **Filter 1 for Quality-related Disciplinary Actions.** We first sort our sample for accreditor actions that are classified in their DAPIP description field with the label “*warning or equivalent – factors affecting academic quality.*” This label clearly indicates that an action was both disciplinary and explicitly focused on academic quality. In our sample, we find 75 accreditor actions that meet this first criterion for a quality-related disciplinary action.
- **Filter 2 for Quality-related Disciplinary Actions.** As our second filter for surfacing accreditor actions that discipline colleges for academic quality or student outcomes, we scan for actions that meet two criteria:
 - *Description criteria:* Actions that have 1 of 18 high-level descriptions that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor’s approval of a college).
 - *Justification criteria:* Actions that, in addition to having a disciplinary-focused description, have 1 of 3 justifications that suggest a concern over academic quality or student outcomes.

We find 494 actions that meet this second filter.

- **Filter 3 for Quality-related Disciplinary Actions.** Finally, we filter our sample for actions that meet the following two criteria:
 - *Description criteria:* Actions that (as in the case of filter 2) have 1 of 18 high-level descriptions that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor's approval of a college).
 - *Justification criteria:* Actions that have "other" as their second-level justification and that, in the text field associated with the "other" justification, appear to be actions related to academic programming or student outcomes. To evaluate these text fields, we read them for plain language meaning and pay particular attention to comments that include keywords related to academic programming or student outcomes (graduation rate, student learning, student progress, etc.).

We find 284 actions that meet this third filter.

Our methodology for identifying quality-related disciplinary actions is summarized in the exhibit below and explained more fully in **Appendix 1: Methodology**.

Exhibit 2

Methodology for Identifying Quality-related Disciplinary Actions

Filter 1 - Action Description

Actions with the one description specific to academic disciplinary action - "Warning or Equivalent-Factors Affecting Academic Quality" [75 actions]

Filter 2 - Action Description + Justification

Actions with one of 18 disciplinary descriptions & one of three justifications related to academic quality and/or student outcomes [494 actions]

Filter 3 - Action Description + 'Other' Justification

Actions with one of 18 disciplinary descriptions & an 'other' justification containing keywords related to academic quality and/or student outcomes [284 actions]

6. Error and Limitations

Our data and analysis are subject to limitations and error, including the following:

- **Completeness and Accuracy of DAPIP Data.** We analyze 31,699 accreditor actions listed in DAPIP between 2012 and 2021. These entries might not account for all actions taken by accreditors in this time-period. Also, DAPIP data might be inaccurate. The US Department of Education, while it hosts the DAPIP database, does not audit it.
- **Error and Limitations of College Scorecard Data.** We rely on the US Department of Education's College Scorecard data for college-specific data on enrollment, graduation rates, student earnings outcomes, and student loan default rates. These data might be incomplete or inaccurate.

We also recognize that our metrics for college quality, while they are the best-available and most-used measures of college quality, might be inadequate or misleading.

- **Error in Identifying Quality-Related Disciplinary Actions.** In our sample of 31,699 accreditor actions, we identify 853 quality-related disciplinary actions. We might under-count these actions.

That said, we believe that the margin of error in our classification of quality-related disciplinary actions is small. Of the 30,846 actions that *we do not classify* as quality-related disciplinary actions:

- 30,043 (97%) of them are actions about which we have near total confidence in our classification choice because the DAPIP descriptions and justifications on which we rely are intelligible and clear.
- Only 803 (3%) of them are actions where we find their DAPIP descriptions and justifications to be ambiguous or incomplete in some way and where, if we had full information on the action, we might alter our classification.

If we were to relabel this last category of actions (i.e. the 803 actions for which DAPIP descriptions and justifications are ambiguous or incomplete) as quality-related disciplinary actions, then we would find 5.2% of actions in our sample (up from 2.7%) to be quality-related disciplinary actions. This way of classifying actions would not alter our overall conclusions.

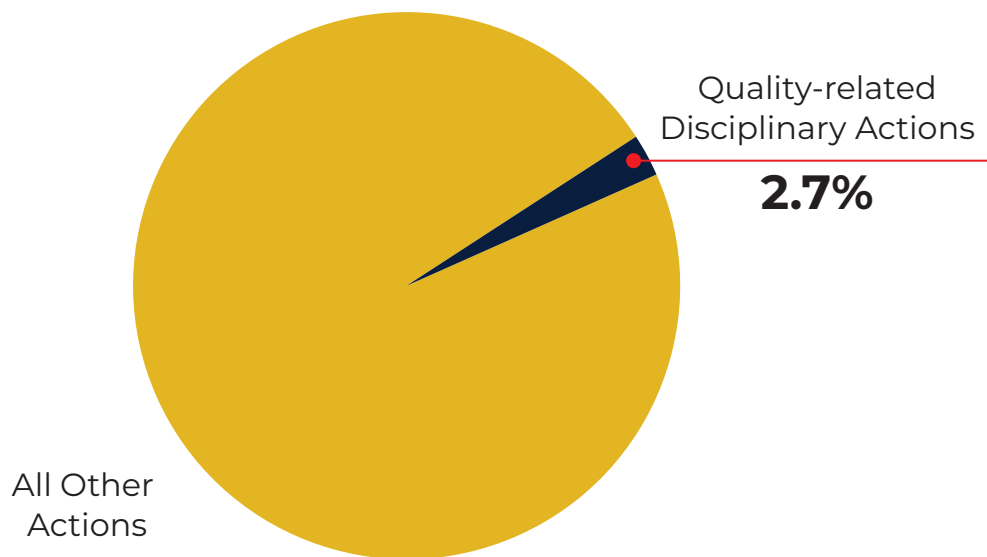
- **No Analysis of Site Visits, Progress Reviews, and Similar Accreditor Activity.** Prior to taking formal action towards colleges, accreditors usually work less formally and more collaboratively with colleges. These activities include site visits and progress reviews, and they often concern matters related to academic programming and student outcomes. We do not observe or analyze these interactions between colleges and their accreditors. We investigate only formal actions taken by accreditors and the degree to which these actions sanction colleges for poor student outcomes or low-quality academic designs.

7. Main Finding

Our main finding is that only 853 (2.7%) of the 31,699 accretor actions in our sample qualify as quality-related disciplinary actions.

Exhibit 3

Quality-related Disciplinary Actions as Percent of All Accretor Actions



This finding is stark evidence that accreditors – despite their powerful position as gatekeepers of public spending on US higher education and despite their assigned role by Congress and the US Department of Education as regulators of college quality – rarely take formal action towards colleges for breakdowns in academic programming or student outcomes.

8. Secondary Findings

In addition to the main finding described above, we present seven secondary findings. These secondary findings describe the types of colleges that are most likely to receive, and the accreditors that are most likely to issue, disciplinary actions related to academic quality or student outcomes.

Secondary Finding 1:

Only 11% of colleges incur a quality-related disciplinary action.

Of the 5,195 colleges in our sample that received an accretor action of some kind between 2012 and 2021, only 564 (11%) received a quality-related disciplinary action from an accretor. In addition:

- Only 8% of public 4-year colleges, 6% of private 4-year colleges, and 5% of public 2-year colleges – colleges enroll a vast majority of US college students – experienced disciplinary action from an accretor for poor outcomes or academic programming.
- Sixty-four percent of the 564 colleges that incurred a quality-related disciplinary action were small, certificate-granting institutions, almost all of them 1-year beauty and barber colleges. These 1-year colleges, which educate few students overall, received 576 (68%) of the 853 quality-related disciplinary actions that we identify.

Exhibit 4 Quality-related Disciplinary Actions by College Type

College Type	Colleges with no QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
1YR Private NP	135	90%	15	10%	150	100%
1YR Private FP	1,358	81%	317	19%	1,675	100%
1YR Public	483	94%	30	6%	513	100%
2YR Private NP	111	80%	27	20%	138	100%
2YR Private FP	130	86%	22	14%	152	100%
2YR Public	684	95%	36	5%	720	100%
4YR Private NP	1,106	94%	66	6%	1,172	100%
4YR Private FP	112	94%	7	6%	119	100%
4YR Public	512	92%	44	8%	556	100%
Total	4,631	89%	564	11%	5,195	100%

Secondary Finding 2:

Graduation rates do not predict quality-related disciplinary action.

Colleges with low graduation rates were not significantly more likely than colleges with high graduation rates to be restrained formally by an accreditor for their academic quality or student outcomes. That observation is true for both 2-year and 4-year colleges.

Exhibit 5(a)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Graduation Rate

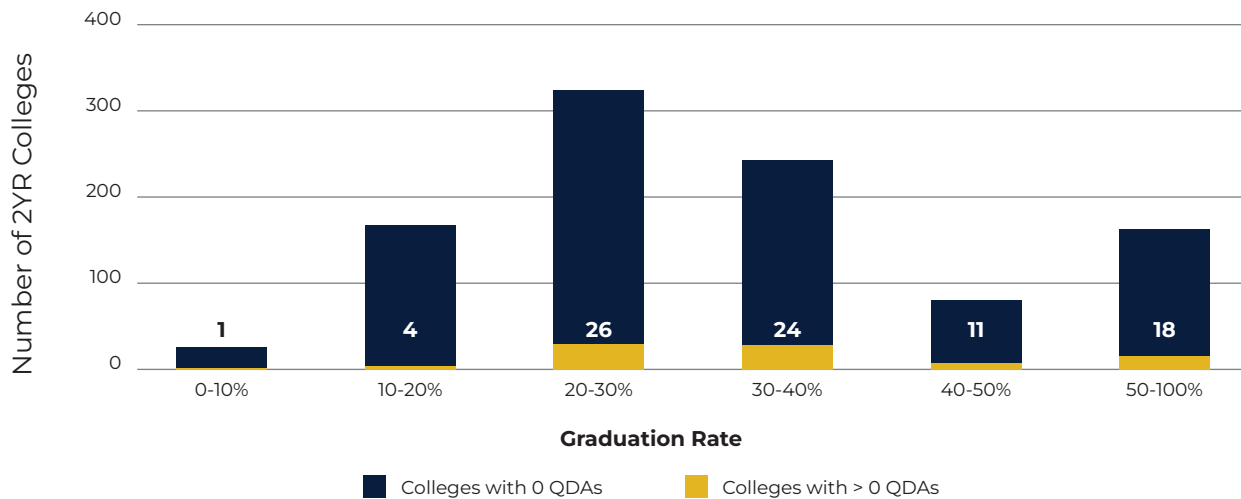


Exhibit 5(b)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Graduation Rate

Graduation Rate	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
0-10%	18	95%	1	5%	19	100%
10-20%	161	98%	4	2%	165	100%
20-30%	291	92%	26	8%	317	100%
30-40%	209	90%	24	10%	233	100%
40-50%	80	88%	11	12%	91	100%
50-100%	142	89%	18	11%	160	100%
Total	901	91%	84	9%	985	100%

Exhibit 6(a)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Graduation Rate

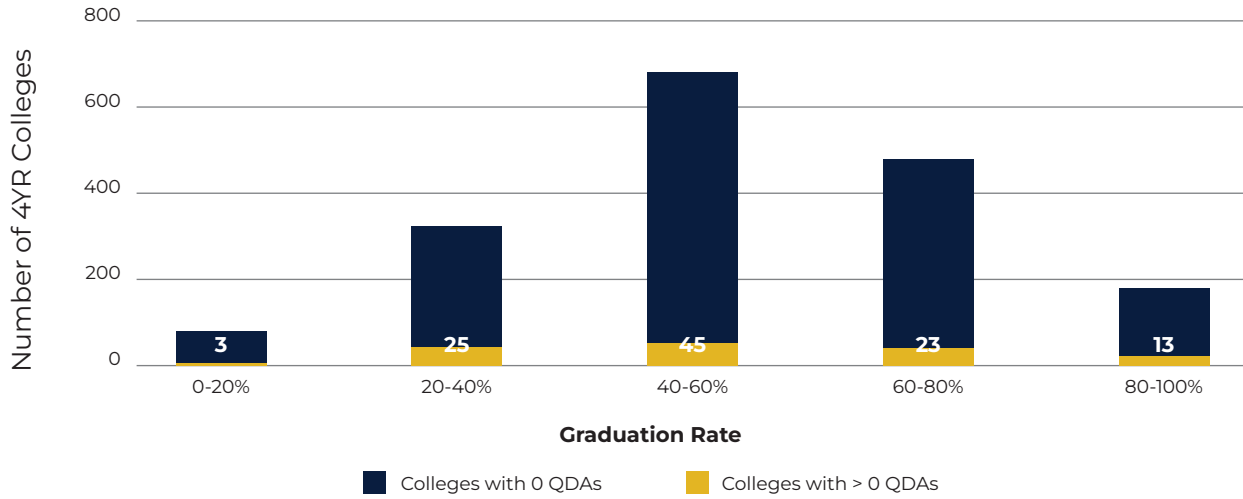


Exhibit 6(b)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Graduation Rate

Graduation Rate	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
0-20%	82	96%	3	4%	85	100%
20-40%	302	92%	25	8%	327	100%
40-60%	625	93%	45	7%	670	100%
60-80%	442	95%	23	5%	465	100%
80-100%	176	93%	13	7%	189	100%
Total	1,627	94%	109	6%	1,736	100%

Secondary Finding 3:

Loan default rates do not predict quality-related disciplinary action.

In both 2-year and 4-year colleges, high loan default rates did not correlate significantly with quality-rated disciplinary action by accreditors. For example, 2-year colleges with the worst loan default rates (i.e., 20-40% loan default rates) were only modestly more likely than 2-year colleges with the best loan default rates (i.e., 0-20% loan default rates) to experience quality-related disciplinary action from an accreditor.

Exhibit 7(a)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Loan Default Rate

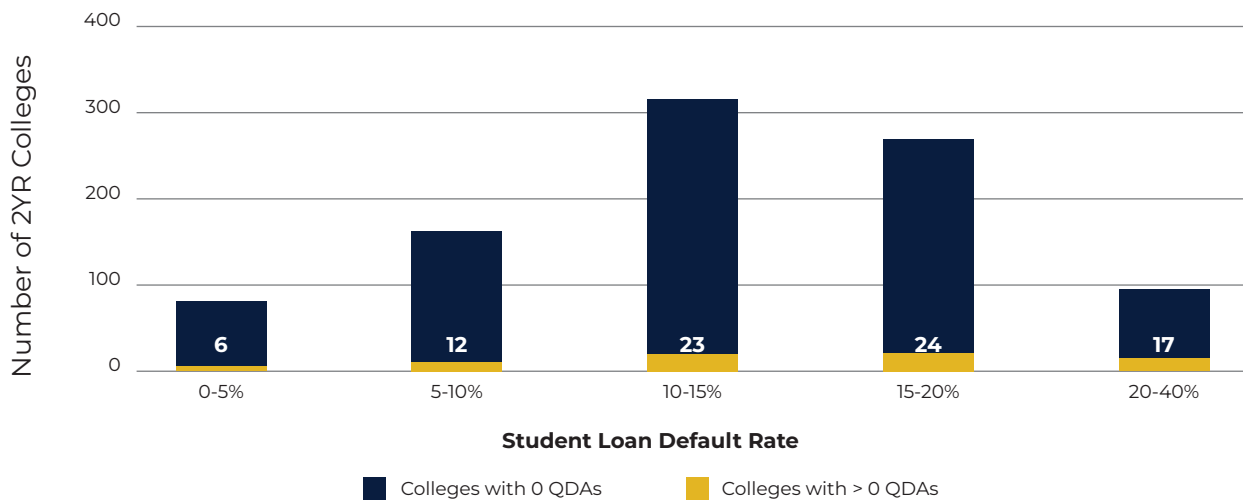


Exhibit 7(b)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Loan Default Rate

Default Rate	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
0-5%	72	92%	6	8%	78	100%
5-10%	157	93%	12	7%	169	100%
10-15%	282	92%	23	8%	305	100%
15-20%	233	91%	24	9%	257	100%
20-40%	80	82%	17	18%	97	100%
Total	825	91%	82	9%	907	100%

Exhibit 8(a)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Loan Default Rate

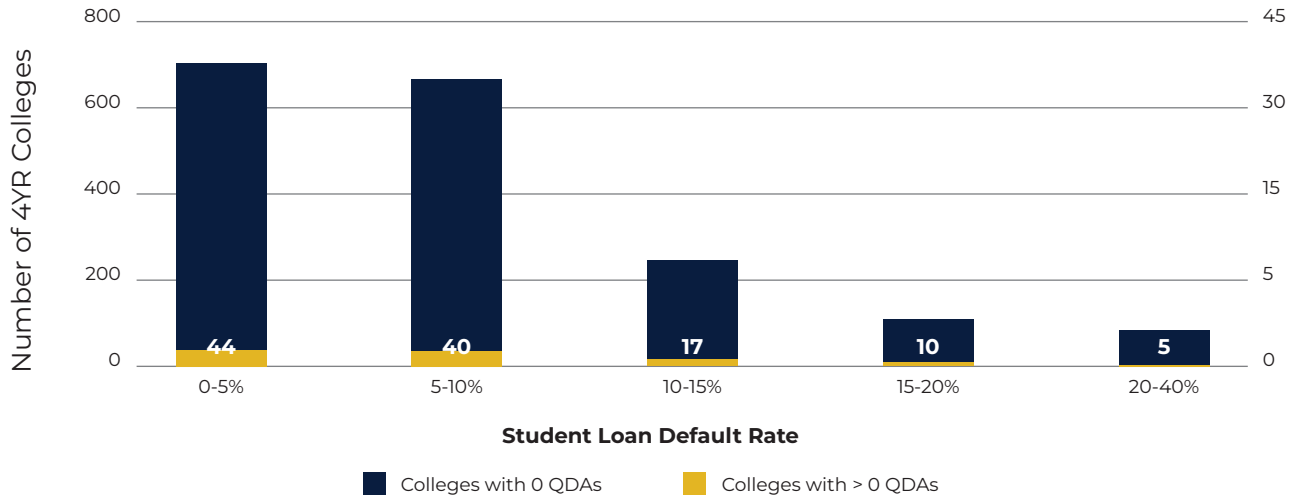


Exhibit 8(b)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Loan Default Rate

Default Rate	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
0-5%	655	94%	44	6%	699	100%
5-10%	622	94%	40	6%	662	100%
10-15%	213	93%	17	7%	230	100%
15-20%	64	86%	10	14%	74	100%
20-40%	58	92%	5	8%	63	100%
Total	1,612	93%	116	7%	1,728	100%

Secondary Finding 4: Earnings outcomes do not predict quality-related disciplinary action.

Colleges with low median student earnings outcomes did not attract higher levels of accretor scrutiny about student outcomes or academic program quality than colleges with high student earnings outcomes. For example, only 8% of 4-year colleges where a median student earns less than \$40K 10 years after enrollment experienced an accretor action related to academic quality or student outcomes.

Exhibit 9(a)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Earnings Outcome

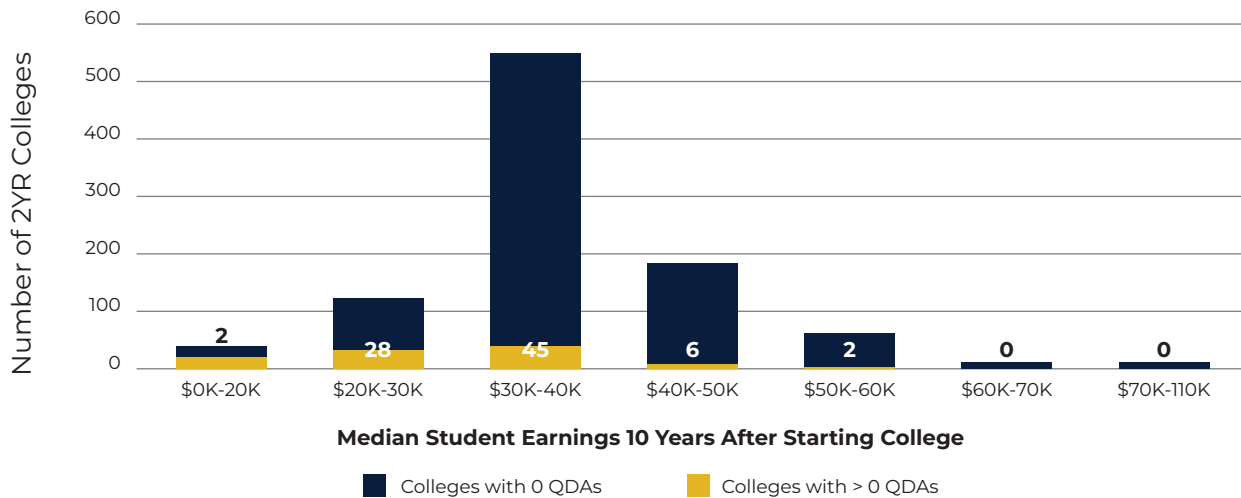


Exhibit 9(b)

Quality-related Disciplinary Actions Directed at 2-Year Colleges by Earnings Outcome

Median Student Earnings	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
\$0K-20K	13	87%	2	13%	15	100%
\$20K-30K	92	77%	28	23%	120	100%
\$30K-40K	514	92%	45	8%	559	100%
\$40K-50K	178	97%	6	3%	184	100%
\$50K-60K	44	96%	2	4%	46	100%
\$60K-70K	9	100%	0	0%	9	100%
\$70K-110K	7	100%	0	0%	7	100%
Total	857	91%	83	9%	940	100%

Exhibit 10(a)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Earnings Outcome

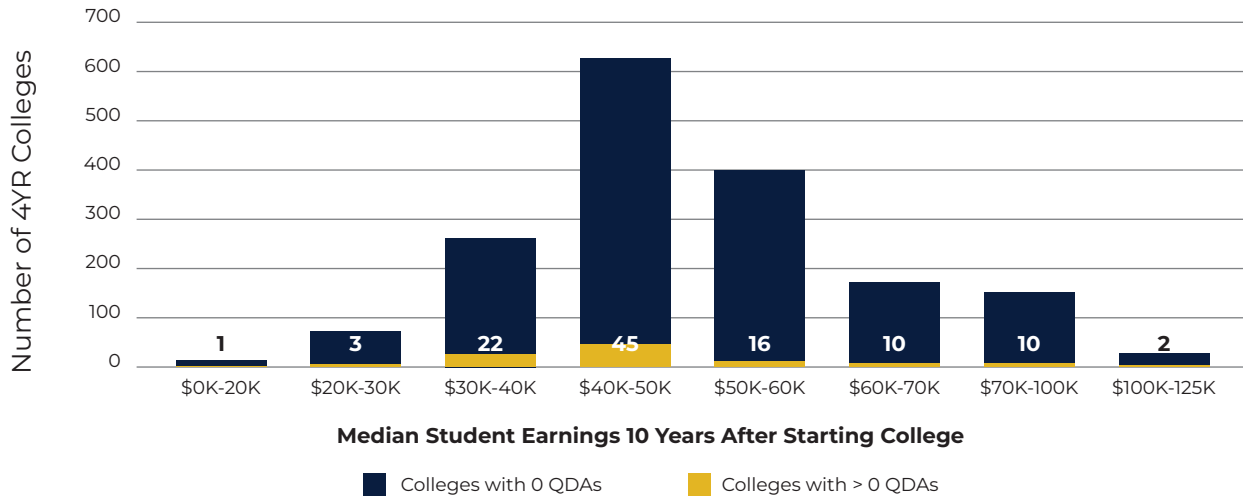


Exhibit 10(b)

Quality-related Disciplinary Actions Directed at 4-Year Colleges by Earnings Outcome

Median Student Earnings	Colleges with 0 QDAs		Colleges with > 0 QDAs		Colleges	
	#	%	#	%	#	%
\$0K-20K	4	80%	1	20%	5	100%
\$20K-30K	64	96%	3	4%	67	100%
\$30K-40K	250	92%	22	8%	272	100%
\$40K-50K	575	93%	45	7%	620	100%
\$50K-60K	387	96%	16	4%	403	100%
\$60K-70K	149	94%	10	6%	159	100%
\$70K-100K	126	93%	10	7%	136	100%
\$100K-125K	8	80%	2	20%	10	100%
Total	1,563	93%	109	7%	1,672	100%

Secondary Finding 5:

90% of Title IV funding flows to colleges that did not receive a quality-related disciplinary action.

Colleges in our sample receive approximately \$112 billion annually in federal financial aid under Title IV of the Higher Education Act. This subsidy takes the form mainly of proceeds from federally issued college loans and from Pell Grants (which are tuition grants for low-income students). In our sample, 90% (\$101 billion) of this annual Title IV funding goes to colleges that, regardless of their outcomes, experienced no accreditor scrutiny related to academic quality or student outcomes between 2012 and 2021.

Exhibit 11(a) Title IV Volume in Colleges Receiving Quality-related Disciplinary Actions

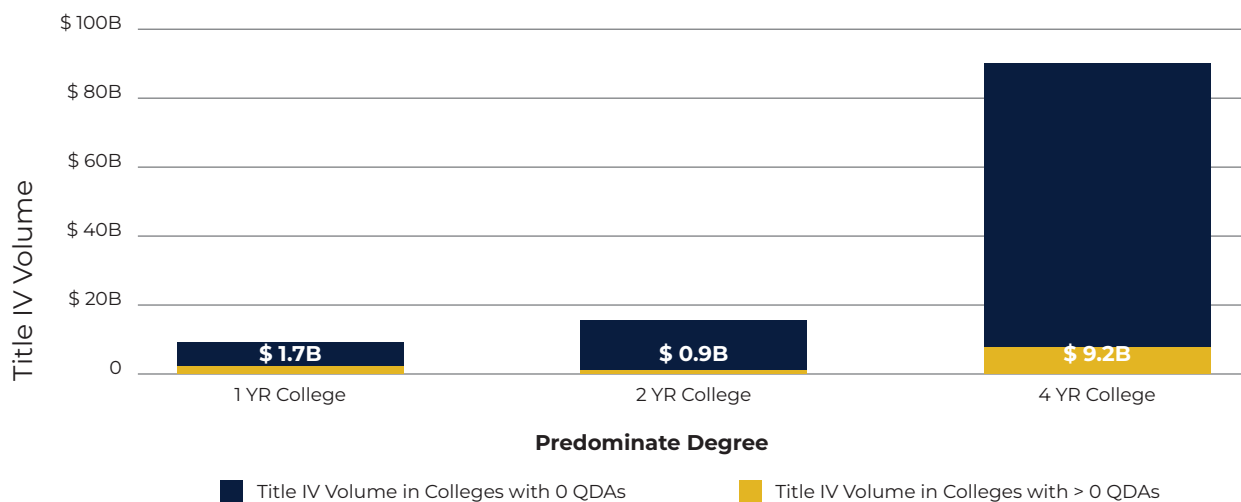


Exhibit 11(b) Title IV Volume in Colleges Receiving Quality-related Disciplinary Actions

Predominant Degree	Title IV Volume in Colleges with 0 QDAs		Title IV Volume in Colleges with > 0 QDAs		Title IV Volume in all Colleges	
	#	%	#	%	#	%
1 YR College						
2 YR College						
4 YR College						
Total						

Secondary Finding 6:

A few accreditors issued most quality-related disciplinary actions.

Of the 56 accreditors that appear in our sample as having taken an action of some kind between 2012 and 2021, only 25 of them issued one or more quality-related disciplinary actions. The other 31 accreditors (55%) issued zero quality-related disciplinary actions in this timeframe.

Quality-related disciplinary actions were heavily concentrated in a small number of accreditors. In our sample, six accreditors issued 76% of the 853 quality-related disciplinary actions that we identify. These six accreditors include only one of the seven regional accreditors that oversee the colleges that serve the vast majority of US college students.

Exhibit 12(a) Accreditors that Issue the Most Quality-related Disciplinary Actions

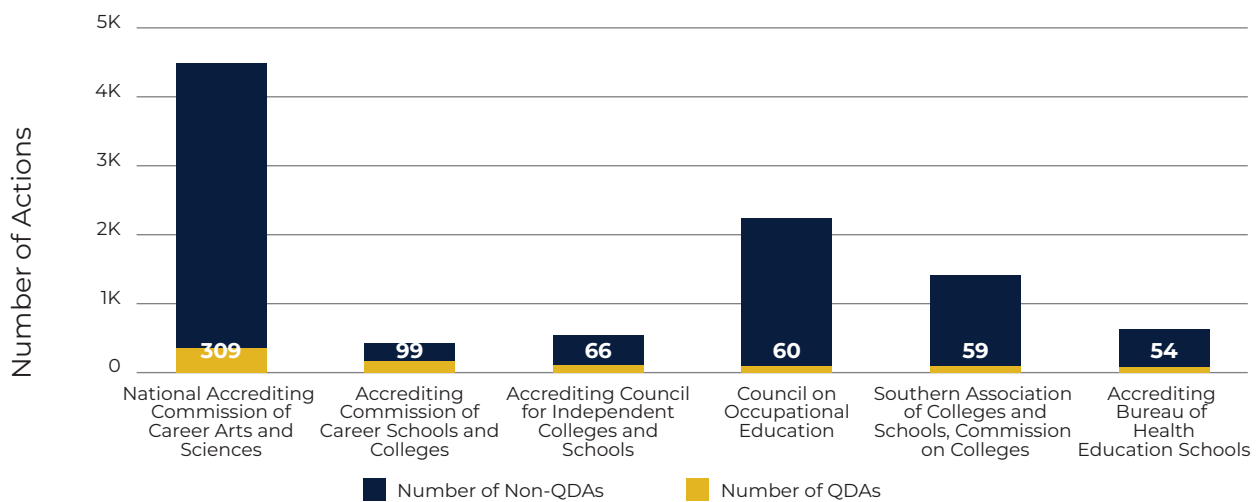


Exhibit 12(b) Accreditors that Issue the Most Quality-related Disciplinary Actions

Accreditors	QDAs		Non-QDAs		All Actions	
	#	%	#	%	#	%
National Accrediting Commission of Career Arts and Sciences	309	7%	4,104	93%	4,413	100%
Accrediting Commission of Career Schools and Colleges	99	23%	333	77%	432	100%
Accrediting Council for Independent Colleges and Schools	66	13%	454	87%	520	100%
Council on Occupational Education	60	3%	2,106	97%	2,166	100%
Southern Association of Colleges and Schools, Commission on Colleges	59	4%	1,305	96%	1,364	100%
Accrediting Bureau of Health Education Schools	54	11%	439	89%	493	100%
All Other Accreditors	206	1%	22,105	99%	22,311	100%
Total	853	3%	30,846	97%	31,699	100%

Secondary Finding 7:

Regional accreditors largely refrained from taking quality-related disciplinary actions.

In our analysis, the regional accreditors that oversee 95% of US college students refrained almost entirely from taking disciplinary action towards colleges with problematic student outcomes or low-grade academic designs. Regional accreditors accounted for 11,103 total actions in our sample (35%), and only 107 (1%) of these actions met our definition of a quality-related disciplinary action.

Exhibit 13(a) Quality-related Disciplinary Actions Taken by Regional Accreditors

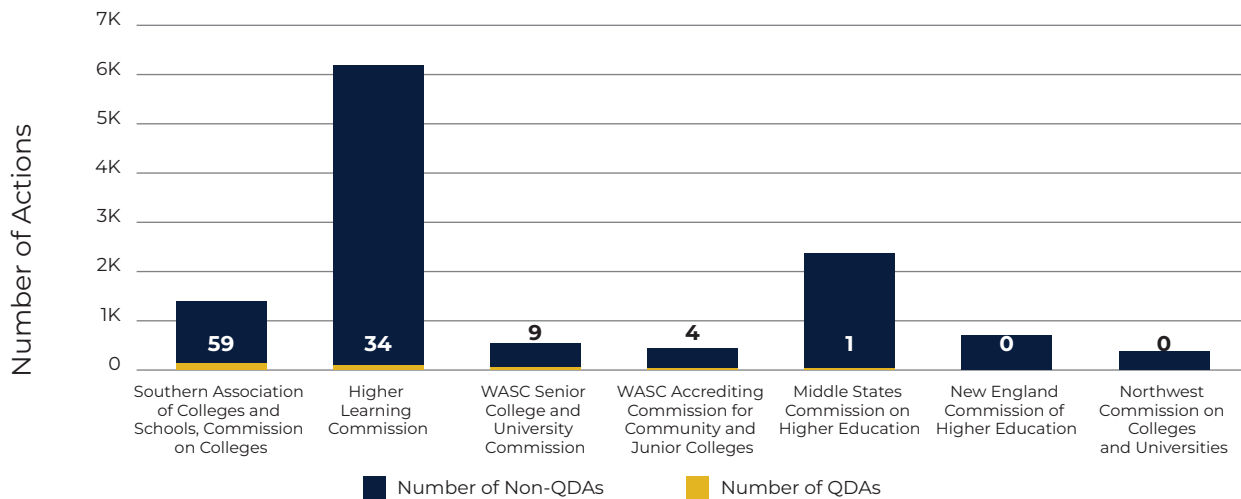
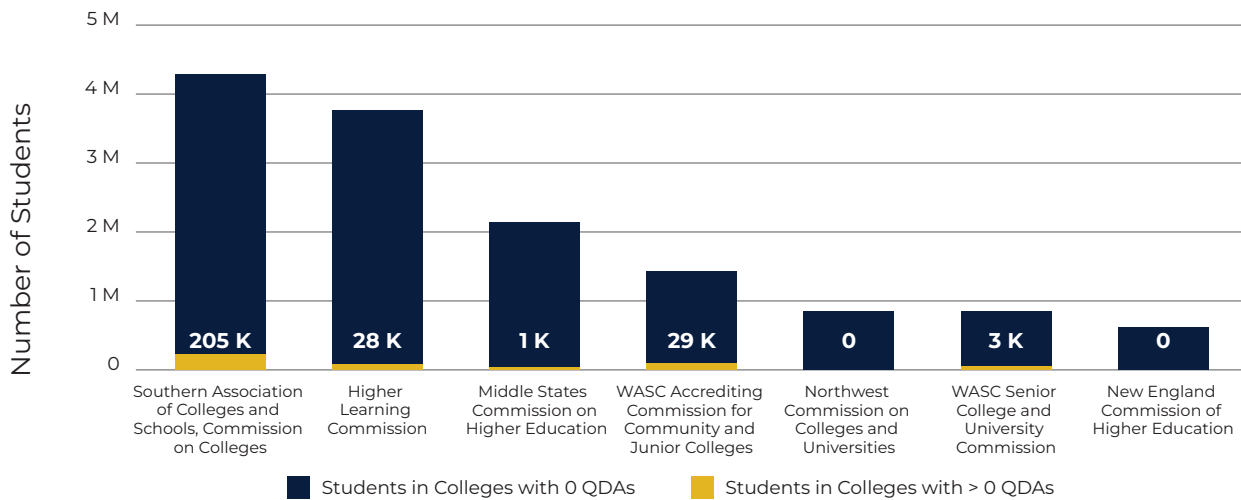


Exhibit 13(b) Quality-related Disciplinary Actions Taken by Regional Accreditors

Accreditors	QDAs		Non-QDAs		All Actions	
	#	%	#	%	#	%
Southern Association of Colleges and Schools, Commission on Colleges	59	4%	1,305	96%	1,364	100%
Higher Learning Commission	34	1%	6,087	99%	6,121	100%
WASC Senior College and University Commission	9	3%	288	97%	297	100%
WASC Accrediting Commission for Community and Junior Colleges	4	2%	231	98%	235	100%
Middle States Commission on Higher Education	1	0%	2,305	100%	2,306	100%
New England Commission of Higher Education	0	0%	551	100%	551	100%
Northwest Commission on Colleges and Universities	0	0%	229	100%	229	100%
Total	107	1%	10,996	99%	11,103	100%

Further, of the 14.9 million students in our sample, 13.9 million students (95%) attend colleges that are overseen by one of the seven regional accreditors. In this sub-population of 13.9 million students, only 265,812 students (2%) attend a regionally accredited college that incurred a quality-related disciplinary action from its regional accreditor between 2012 and 2021.

Exhibit 14(a)**Student Reach of Quality-related Disciplinary Actions Taken by Regional Accreditors****Exhibit 14(b)****Student Reach of Quality-related Disciplinary Actions Taken by Regional Accreditors**

Accreditors	Students in Colleges with > 0 QDAs		Students in Colleges with 0 QDAs		All Students	
	#	%	#	%	#	%
Southern Association of Colleges and Schools, Commission on Colleges	204,651	5%	3,990,295	95%	4,194,946	100%
Higher Learning Commission	27,822	1%	3,805,732	99%	3,833,554	100%
Middle States Commission on Higher Education	1,268	0%	2,077,351	100%	2,078,619	100%
WASC Accrediting Commission for Community and Junior Colleges	29,214	2%	1,274,404	98%	1,303,618	100%
Northwest Commission on Colleges and Universities	0	0%	896,828	100%	896,282	100%
WASC Senior College and University Commission	2,857	0%	875,322	100%	878,179	100%
New England Commission of Higher Education	0	0%	742,021	100%	742,021	100%
All Other Accreditors	88,434	13%	575,194	87%	663,618	100%
Total	354,236	2%	14,237,147	98%	14,591,383	100%

9. Conclusion

Our goal in writing this report is to inform and encourage debate about accreditation practice and policy.

Our findings – starting with our core conclusion that only 2.7% of actions taken by accreditors toward colleges between 2012 and 2021 were ones that disciplined colleges for poor student outcomes or low-quality academic programming – are stark. They portray accreditors – notably the dominant regional accreditors – as refraining almost entirely from sanctioning colleges for troublesome academic designs or inadequate student outcomes.

That accreditors take almost no action towards colleges for poor academic quality or low student outcomes is concerning. It is an abdication of the powerful legal authority and important role that they have been given by the Higher Education Act and by the US Department of Education to monitor and promote college quality and to help direct public spending on higher education.

Our findings are a call to debate and action among practitioners, advocates, and policy makers in the accreditation field. They invite frank conversations about the need for change to the practices of existing accreditors, about the need for new models and new actors in accreditation, and about the need for revisions to accreditation-related law and regulation.

Appendix 1: Methodology

This appendix describes in detail the three filters that we use to identify quality-related disciplinary actions in our sample of 31,699 DAPIP-listed actions.

Filter 1: Actions that have “warning or equivalent – factors affecting academic quality” as their high-level description.

We first sort our sample for accretor actions that are classified in their description field (highlighted below) as “warning or equivalent – factors affecting academic quality.” This description indicates clearly that an action was both disciplinary and explicitly focused on academic quality. In our sample, we find 75 accretor actions that meet this first criterion for a quality-related disciplinary action.

Accretor Action Descriptions (39)

Accreditation Reaffirmed: Warning Removed	Institution Closed
Accreditation Reaffirmed: Probation Removed	Loss of Accreditation or Preaccreditation: Denial
Accreditation Reinstated: Termination Overturned on Appeal	Loss of Accreditation or Preaccreditation: Lapse
Additional Location Closed	Loss of Accreditation or Preaccreditation: Other
Affirm Denial Following Appeal	Loss of Accreditation or Preaccreditation: Voluntary Withdrawal
Agency no longer recognized	Probation or Equivalent or a More Severe Status: Other
Approved for Distance Education	Probation or Equivalent or a More Severe Status: Probation
Change in Agency recognition	Probation or Equivalent or a More Severe Status: Show Cause
Deny Substantive Change: Degree	Probation or Equivalent or a More Severe Status: Warning
Deny Substantive Change: Final Branch Approval	Probation or Equivalent or More Severe Status: Monitoring
Deny Substantive Change: Other	Program Merged Into Institutional Accreditation
Deny Substantive Change: Ownership	Removal of Approval for Correspondence Education
Deny Substantive Change: Program	Removal of Approval for Distance Education
Grant Substantive Change: Degree	Removal of Monitoring Status
Grant Substantive Change: Final Branch Approval	Removal of Show Cause Status
Grant Substantive Change: Other	Renewal of Accreditation
Grant Substantive Change: Ownership	Stay Denial Pending Appeal
Grant Substantive Change: Program	Voluntary Withdrawal Received
Heightened Monitoring or Focused Review	Warning or Equivalent-Factors Affecting Academic Quality
Initial Accreditation	

Accretor Action Justifications (11)

Additional oversight is required to ensure a resolution of compliance issues	Other - Provide unlisted or multiple justifications
Concerns about issues affecting academic quality	Significantly out of compliance - fiscal and administrative capacity
Concerns about title IV, HEA responsibilities/ potential fraud or abuse	Significantly out of compliance - recruiting and admissions practices
Fails to meet agency standards for initial or renewed accreditation	Significantly out of compliance - student achievement
Has satisfactorily addressed all compliance concerns from previous actions	Significantly out of compliance - title IV, HEA responsibilities
Is in compliance with all of the agency's accreditation standards	

Filter 2: Actions that have 1 of 18 generally disciplinary descriptions and have 1 of 3 justifications that indicate academic or student outcome problems.

Our second filter in surfacing quality-related disciplinary actions is to scan for actions that meet two criteria:

- **Description Criteria:** Actions that have 1 of 18 high-level descriptions (highlighted below) that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor's approval of a college).
- **Justification Criteria:** Actions that, in addition, have 1 of 3 second-level justifications (highlighted below) which suggest that the accreditor was moving to discipline a college out of a concern over academic quality or student outcomes.

We find 494 actions that meet this second filter.

Accreditor Action Descriptions (39)	
Accreditation Reaffirmed: Warning Removed	Institution Closed
Accreditation Reaffirmed: Probation Removed	Loss of Accreditation or Preaccreditation: Denial
Accreditation Reinstated: Termination Overturned on Appeal	Loss of Accreditation or Preaccreditation: Lapse
Additional Location Closed	Loss of Accreditation or Preaccreditation: Other
Affirm Denial Following Appeal	Loss of Accreditation or Preaccreditation: Voluntary Withdrawal
Agency no longer recognized	Probation or Equivalent or a More Severe Status: Other
Approved for Distance Education	Probation or Equivalent or a More Severe Status: Probation
Change in Agency recognition	Probation or Equivalent or a More Severe Status: Show Cause
Deny Substantive Change: Degree	Probation or Equivalent or a More Severe Status: Warning
Deny Substantive Change: Final Branch Approval	Probation or Equivalent or More Severe Status: Monitoring
Deny Substantive Change: Other	Program Merged Into Institutional Accreditation
Deny Substantive Change: Ownership	Removal of Approval for Correspondence Education
Deny Substantive Change: Program	Removal of Approval for Distance Education
Grant Substantive Change: Degree	Removal of Monitoring Status
Grant Substantive Change: Final Branch Approval	Removal of Show Cause Status
Grant Substantive Change: Other	Renewal of Accreditation
Grant Substantive Change: Ownership	Stay Denial Pending Appeal
Grant Substantive Change: Program	Voluntary Withdrawal Received
Heightened Monitoring or Focused Review	Warning or Equivalent-Factors Affecting Academic Quality
Initial Accreditation	

Accreditor Action Justifications (11)	
Additional oversight is required to ensure a resolution of compliance issues	Other - Provide unlisted or multiple justifications
Concerns about issues affecting academic quality	Significantly out of compliance - fiscal and administrative capacity
Concerns about title IV, HEA responsibilities/ potential fraud or abuse	Significantly out of compliance - recruiting and admissions practices
Fails to meet agency standards for initial or renewed accreditation	Significantly out of compliance - student achievement
Has satisfactorily addressed all compliance concerns from previous actions	Significantly out of compliance - title IV, HEA responsibilities
Is in compliance with all of the agency's accreditation standards	

Filter 3: Actions that have 1 of 18 generally disciplinary descriptions and have an “other” justification indicating academic or student outcome problems.

Finally, we filter our sample for 284 actions that meet the following two criteria:

- **Description Criteria:** Actions that (as in the case of filter 2) have 1 of 18 high-level descriptions (highlighted below) that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor’s approval of a college).
- **Justification Criteria:** Actions that have “other” as their second-level justification (highlighted below) and that, in the text field associated with the “other” justification, appear to be actions related to academic programming or student results. To evaluate these text fields, we read them for plain language meaning and pay particular attention to comments that include keywords related to academic programming or student outcomes (graduation rate, student learning, student progress, etc.).

Accreditor Action Descriptions (39)	
Accreditation Reaffirmed: Warning Removed	Institution Closed
Accreditation Reaffirmed: Probation Removed	Loss of Accreditation or Preaccreditation: Denial
Accreditation Reinstated: Termination Overturned on Appeal	Loss of Accreditation or Preaccreditation: Lapse
Additional Location Closed	Loss of Accreditation or Preaccreditation: Other
Affirm Denial Following Appeal	Loss of Accreditation or Preaccreditation: Voluntary Withdrawal
Agency no longer recognized	Probation or Equivalent or a More Severe Status: Other
Approved for Distance Education	Probation or Equivalent or a More Severe Status: Probation
Change in Agency recognition	Probation or Equivalent or a More Severe Status: Show Cause
Deny Substantive Change: Degree	Probation or Equivalent or a More Severe Status: Warning
Deny Substantive Change: Final Branch Approval	Probation or Equivalent or More Severe Status: Monitoring
Deny Substantive Change: Other	Program Merged Into Institutional Accreditation
Deny Substantive Change: Ownership	Removal of Approval for Correspondence Education
Deny Substantive Change: Program	Removal of Approval for Distance Education
Grant Substantive Change: Degree	Removal of Monitoring Status
Grant Substantive Change: Final Branch Approval	Removal of Show Cause Status
Grant Substantive Change: Other	Renewal of Accreditation
Grant Substantive Change: Ownership	Stay Denial Pending Appeal
Grant Substantive Change: Program	Voluntary Withdrawal Received
Heightened Monitoring or Focused Review	Warning or Equivalent-Factors Affecting Academic Quality
Initial Accreditation	

Accreditor Action Justifications (11)	
Additional oversight is required to ensure a resolution of compliance issues	Other - Provide unlisted or multiple justifications
Concerns about issues affecting academic quality	Significantly out of compliance - fiscal and administrative capacity
Concerns about title IV, HEA responsibilities/ potential fraud or abuse	Significantly out of compliance - recruiting and admissions practices
Fails to meet agency standards for initial or renewed accreditation	Significantly out of compliance - student achievement
Has satisfactorily addressed all compliance concerns from previous actions	Significantly out of compliance - title IV, HEA responsibilities
Is in compliance with all of the agency's accreditation standards	

Appendix 2: Profiles of Selected Regional Accreditors

In this appendix, we profile partially the oversight activities of two prominent regional accreditors, the Higher Learning Commission (HLC) and the Western Association of Schools and Colleges: Senior College and University Commission (WSCUC). In particular, we examine the manner in which these two large accreditors oversee their 4-year colleges.

For space reasons, we do not profile all seven regional accreditors, but they all have profiles similar to the ones we present here.

- **Higher Learning Commission (HLC).** HLC accredits 551 4-year colleges. It has the largest student reach of any accreditor in the US. It accredits mostly colleges located in the Midwest.
- **Western Association of Schools and Colleges: Senior College and University Commission (WSCUC).** WSCUC accredits 120 4-year colleges, most of which are located in the West. WSCUC is often described as the most innovative regional accreditor.

In our sample, HLC and WSCUC took negligible action to sanction poor student outcomes and questionable academic programming in the 4-year colleges that they oversee. Between 2012 and 2021, HLC and WSCUC collectively issued only 12 quality-related disciplinary actions to their combined 671 4-year colleges, many of which exhibit worrisome graduation rates, loan default rates, or student earnings outcomes.

Higher Learning Commission Exhibits

Exhibit 15(a)

HLC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Graduation Rates

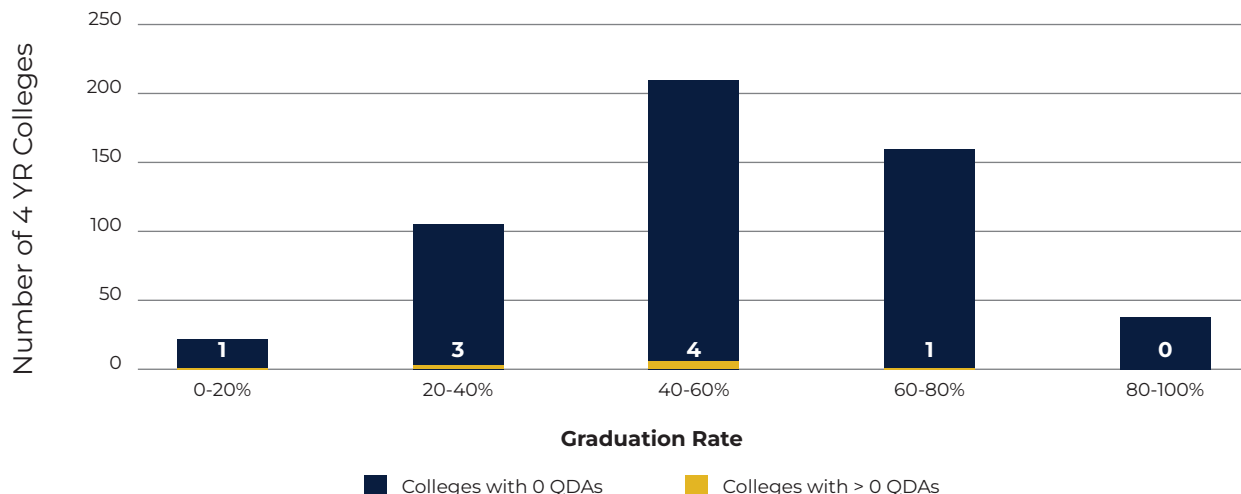


Exhibit 15(b)

HLC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Loan Default Rates

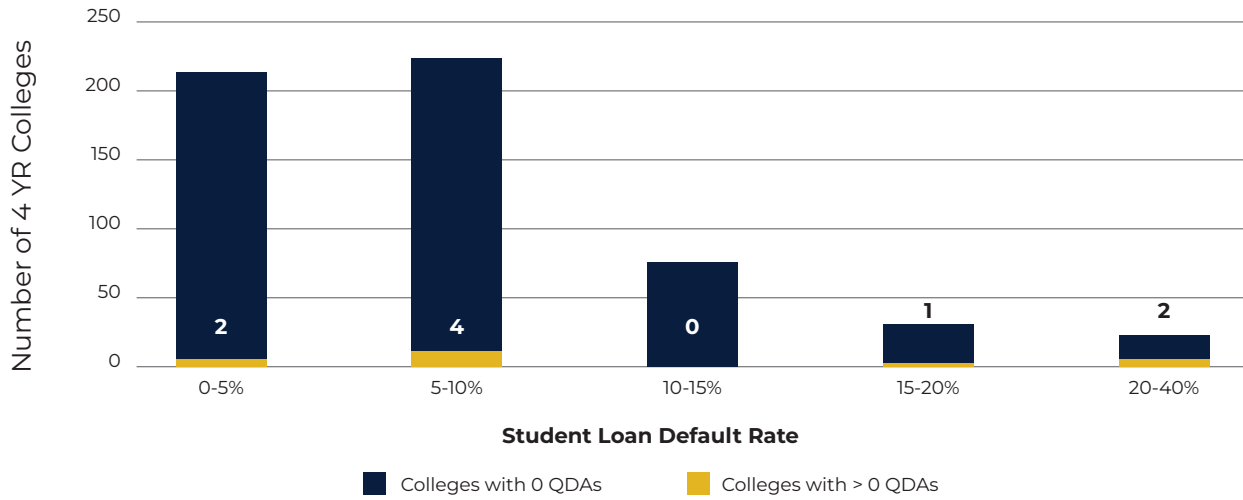
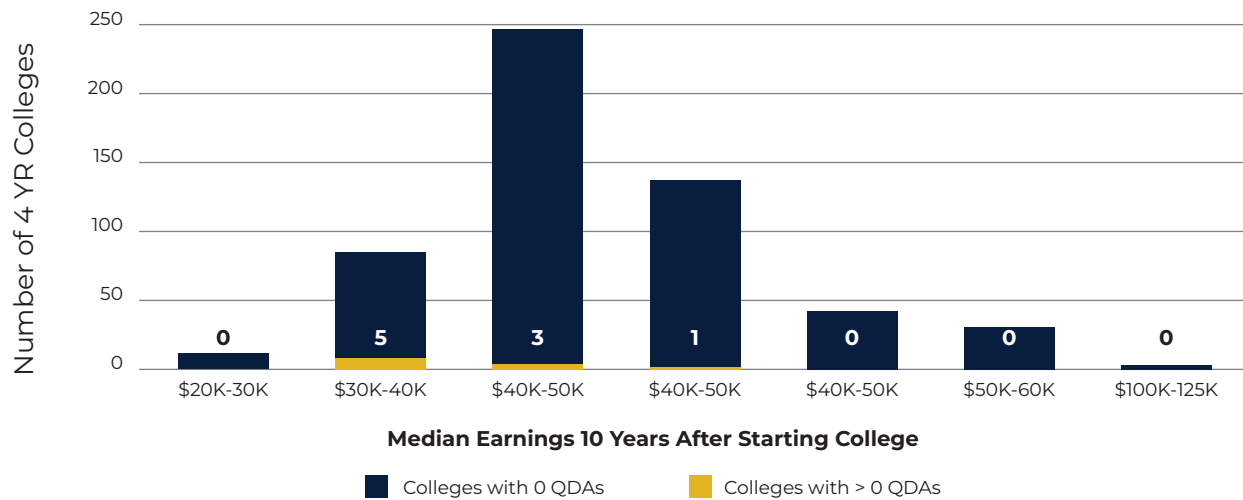


Exhibit 15(c)

HLC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Earnings Outcomes



Western Association of Schools and Colleges: Senior College and University Commission Exhibits

Exhibit 16(a)

WSCUC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Graduation Rates

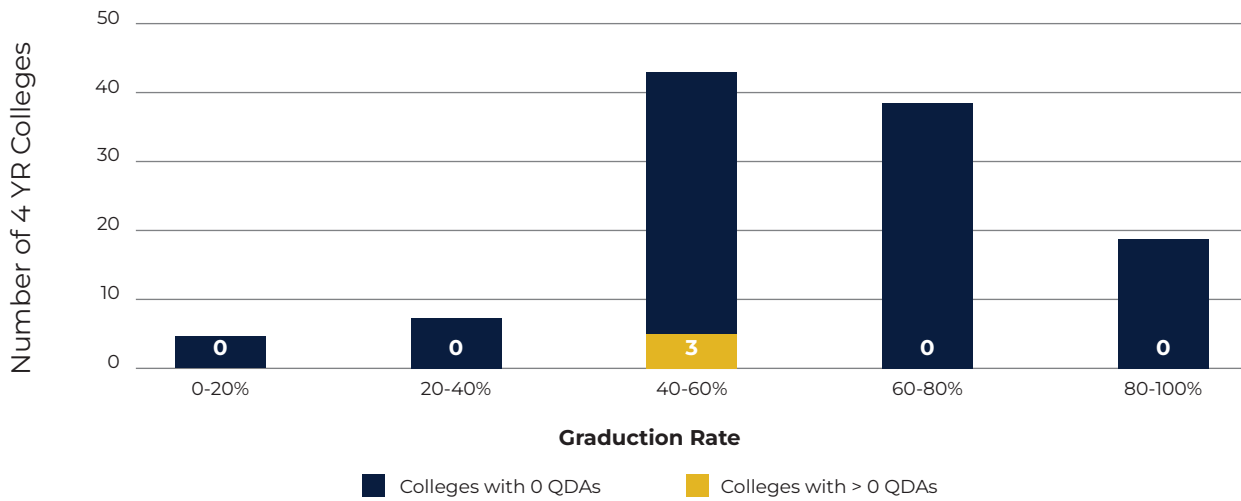


Exhibit 16(b)

WSCUC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Loan Default Rates

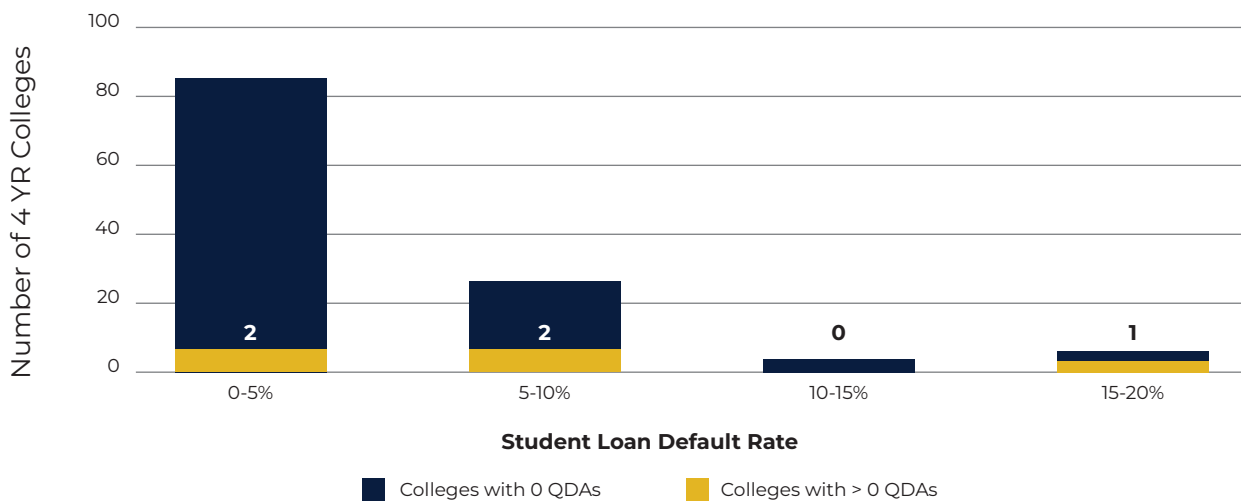
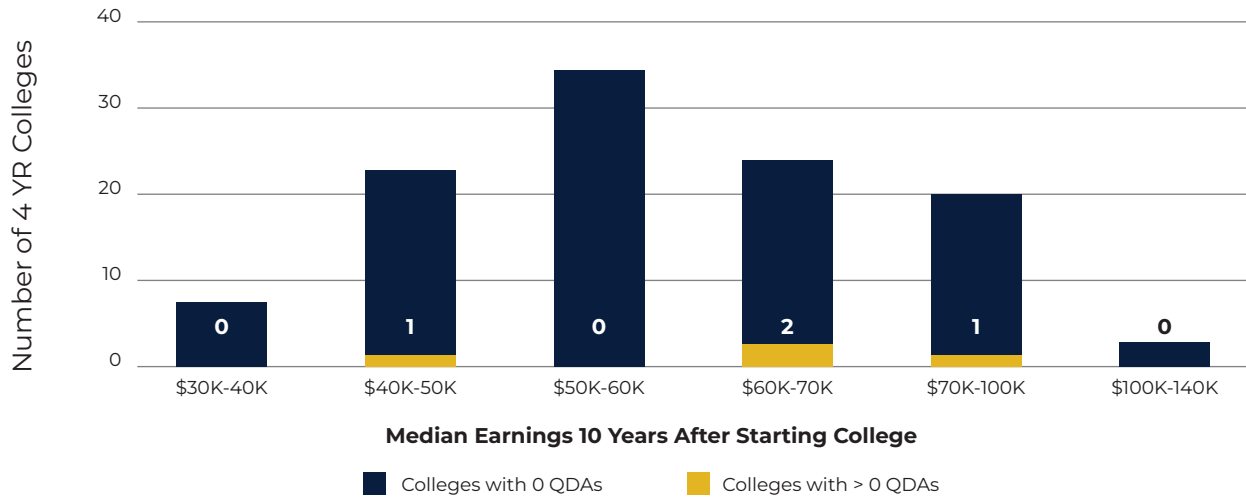


Exhibit 16(c)

WSCUC Quality-related Disciplinary Actions Directed at 4-Year Colleges by Earnings Outcomes



Endnotes

- 1. Downloadable Excel file.** We make available on the College101 website a downloadable excel file that includes all of our data and a complete explanation of our sources and research method. The file allows independent researchers to examine in detail our work and to replicate our results.
- 2. Graduation Rates.** Graduation rates are the percent of first-time, full-time students who complete an Associate's degree in less than three years or a Bachelor's degree in less than 6 years. Graduation rates are for students entering 4-year colleges in the fall of 2013 and for students entering 2-year colleges in the fall of 2016. Graduation rate data are from the College Scorecard (2021).
- 3. Student Loan Default Rates.** Student loan default rates are the percentage of a school's borrowers who default within three years of entering repayment on various federal loans. The data include all borrowers who entered repayment in 2017 and defaulted in 2017, 2018 or 2019. Student loan default rate data are from the College Scorecard (2021).
- 4. Median 10 Year Earnings.** Median students earnings are the median earnings of federally aided students who enrolled in an institution in 2007/2008 and were employed (and not enrolled) in 2017/2018. Earnings are the sum of wages and deferred compensation from all non-duplicate W-2 forms (from both full- and part-time employment), plus positive self-employment earnings. Earnings data include all entrants regardless of graduation status. Earnings data are from the College Scorecard (2022).
- 5. Title IV Volume.** Title IV volume includes federal aid to campus-based programs (e.g., federal supplemental educational opportunity grants and federal work study support), tuition grants (including Pell Grants and TEACH program funding), and proceeds from various types of federal loans. Title IV data are from the Federal Student Aid Data Center for the 2019-2020 academic year.
- 6. Enrollment.** Enrollment is the number of undergraduate certificate- seeking or degree-seeking students enrolled in an institution in the Fall of 2019. Enrollment data are from the College Scorecard (2021).