

A One-Year Review of the Council of Regional Accrediting Commissions' Graduation Rate Information Project



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Regional Accrediting Commissions

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Executive Summary

In September 2016, the Council of Regional Accrediting Commissions (C-RAC)—an umbrella group comprised of the seven regional higher education agencies—launched the Graduation Rate Information Project. C-RAC examined the federal Integrated Postsecondary Education Data System (IPEDS) “Student Right to Know” graduation rates, a long time measuring stick for institutional performance, at four-year institutions that had graduation rates at or below 25 percent, and two-year institutions that had graduation rates at or below 15 percent.

Key Findings:

Federal graduation data are incomplete, but improving. The main federal graduation indicator, the Student Right to Know graduation rate, provides an incomplete picture of institutional outcomes for many of the colleges and universities identified by C-RAC as having low graduation

year institutions. The graduation data are most incomplete for open admission, two-year colleges, which serve the most disadvantaged students. The vast majority of students attending these institutions (75 percent are open-admission, public, two-year colleges) do not show up on the Student Right To Know graduation rate since they enroll in comparatively low numbers as first-time, full-time students. In September 2017, the U.S. Department of Education began reporting a broader range of outcomes measures reflecting a longer period of completion and capturing a larger cohort of students who are not first-time, full-time. Although still incomplete, the Student Right to Know graduation rate is still the key federal graduation indicator on the Department’s widely accessed College Scorecard website.

The new, more complete federal data—and other non-federal graduation rate data from sources such as the National Student Clearinghouse—show graduation outcomes that are more robust than what were previously reported. Using these new data, accreditors found that institutions identified by C-RAC as having extremely low graduation rates in most cases had stronger outcomes than federal data previously indicated.

Using new data, many of the institutions identified in 2016 by C-RAC have significantly stronger outcomes than the original data had suggested.

rates: It measures only first-time, full-time students completing their degree within three years for community colleges and six years for four-

Graduation rates matter, but accreditors also use other key outcome data to identify struggling institutions and institutional success. Regional accreditors use federal

graduation data as part of their review and decision process. In order to get a more complete picture, accreditors, annually and through their multi-year accreditation process, increasingly are using graduation rate information along with other data as a mechanism to determine when to take a closer look at institutions between regularly scheduled reviews. Accreditors also are increasingly relying on transfer rates, non-federal graduation data, course completion rates, retention rates, employment rates in fields central to the mission of the institution, and other data.

Taking a closer look at struggling schools helps accreditors take appropriate oversight and action. For accreditors, a deep awareness of outcomes using the best available universe of data can be a powerful tool for identifying problems and determining what combination of improvement, heightened oversight, or sanction is appropriate.

Accreditors gained more insight about institutional challenges and strategies for improvement. Institutions with low graduation rates are aware of the importance of raising graduation rates and are coordinating multiple activities to make this happen. Colleges and universities, including low graduation rate institutions and those with much higher graduation rates, are making significant changes. These include bolstering advising and student

support services, introducing early warning systems, revamping orientation, introducing bridge programs from high school to college, and redesigning courses. Accreditors are exploring approaches such as predictive analytics and regional benchmarking to better understand graduation rates. They also are studying which strategies are working at different types of institutions to improve graduation outcomes.

The work to improve graduation rates and results continues. C-RAC believes that the federal government, accreditors, and institutions can do more to better understand and improve graduation rates. To start, C-RAC recommends that the federal government continue its work to improve graduation data. It also can further clarify differences in graduation data reported on different U.S. Department of Education websites; use the more complete data that appear on College Navigator in addition to the Student Right to Know graduation rates on the College Scorecard site; and identify more clearly on all sites the size of the student cohort used to determine graduation rates. Institutions must continue to increase their focus on improving graduation rates while maintaining learning outcomes, and systematically introduce across the college strategies that have proven to be effective. Accreditors must continue to innovate and develop better ways to leverage accurate graduation rates and other measures to help institutions improve, and hold them accountable.

I. Introduction

Every student who pursues higher education with a desire to earn a college degree or certificate deserves the strongest possible chance to attain that credential. Having accurate and actionable data on graduation rates can help policymakers and the public ascertain an institution's success in helping students achieve their academic goals.

In September 2016, the Council of Regional Accrediting Commissions (C-RAC)—an umbrella group comprised of the seven regional higher education accrediting agencies—announced that its members would launch a nationwide effort to increase their focus on graduation rates for colleges and universities, particularly those with the lowest federally defined graduation rates. This paper provides an update on this effort and summarizes information gathered by the seven accreditors. Working independently, they sought to address five broad questions about graduation rates:

- 1. What are the characteristics of institutions with low graduation rates?**
- 2. Do federal graduation rates used to evaluate colleges provide a complete and accurate picture of institutional success in helping students graduate from college? Are federal graduation rate data sufficient to reflect overall institutional quality?**
- 3. To what extent and how do accreditors use graduation rates to measure institutional quality and to monitor and encourage improved graduation rate outcomes for institutions with low graduation rates? What additional steps will they take in the near future?**
- 4. What challenges did institutions with low graduation rates say they face when addressing graduation rates? To what extent have accreditors observed institutions taking steps to improve their graduation rates?**
- 5. What further actions do regional accreditors recommend that the federal government, accreditors, and institutions take to improve the tracking and reporting of accurate graduation rates and to improve graduation results?**

Background

Colleges have a responsibility to help the students they enroll complete their degrees and certificates and be fully prepared to find a high-quality job or to transfer successfully to another institution to complete their studies.

Notwithstanding widespread acknowledgement of that responsibility, federal data collected by the U.S. Department of Education show that a large number of students who enter college do not graduate “on-time” (defined by the federal government as completing college within 150 percent time of entry—i.e., within three years for community colleges and six years for baccalaureate institutions).

These federal graduation data, known as the “Student Right to Know” graduation rate, are collected as part of the Integrated Postsecondary Education Data System (IPEDS), a long-established system for collecting and reporting graduation rate and other data for nearly every college and university in the country. This graduation rate is used on multiple consumer websites, including the Department of Education’s widely used College Scorecard and the Department’s more comprehensive College Navigator sites. (*See descriptions on page 7.*) The Student Right to Know data are the most readily available, accessible, and comparable information on institutional-level graduation rates. They are thus often used as a proxy for overall institutional quality by students, policymakers, and the media. Similarly, the National Advisory Committee on Institutional Quality and Integrity, which provides recommendations to the U.S. Secretary of Education for the recognition of accreditors and others, uses IPEDS data reported in the

Department of Education’s accreditor dashboard (<https://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf>) to help determine the effectiveness of accreditors in overseeing institutions. (*See sidebar on Page 8.*)

However, while regional accreditors have made Student Right to Know graduation rates a key part of their periodic reviews and required annual reporting of colleges and universities, they also have viewed the rates with caution. Many institutions, researchers, student groups, and accreditors

Graduation rate data can help policymakers and the public ascertain an institution’s success in helping students achieve their academic goals.

have long criticized the Students Right to Know graduation rate for often failing to account for a large percentage of students, and for the increased time it takes for many non-traditional students to obtain a degree, and for the diversity of institutional missions.

In recent years, regional accreditors have explored using alternative sources of data, such as from the National Student Clearinghouse, to measure institutional success in graduating students. Some also have developed their own databases that monitor and benchmark institutional performance on graduation results. To gain a more complete picture of institutional success in achieving key student outcomes, regional accreditors also buttress

the use of graduation rates with a broader range of student outcome measures, including year-to-year retention, assessments of student learning, and the extent to which students transfer successfully from two- to four-year institutions.

At the same time, federal efforts to collect better graduation and completion data are just beginning to emerge. Although not a replacement for the Student Right to Know graduation rate, the Department of Education's College Navigator now includes another category of data called "institutional outcomes." These data capture all students (not just those who are first-time, full-time), including those who transfer.

Collectively, these efforts are enabling accreditors to see a more complete and accurate picture of institutional quality, particularly for colleges with different missions and diverse student populations.

As a result, accreditors are more effectively poised to hold institutions accountable and also to help them recognize and improve their outcomes.

Approach

Beginning in September 2016, C-RAC members identified and reviewed institutions that fell below a threshold graduation rate. Specifically, the regional accreditors, using the "Performance Data by Accreditors" (PDA) section of the U.S. Department of Education's website (<https://www.ed.gov/accreditation>), examined four-year institutions that had six-year graduation rates at or below 25 percent, and two-year institutions that had three-year graduation rates at or below 15 percent. The data posted by the Department at that time were based on 2012-13 graduation rates. *(Continued on page 8.)*

About the Council of Regional Accrediting Commissions (C-RAC)

C-RAC's seven regional organizations are responsible for the accreditation of approximately 3,000 of the nation's colleges and universities. The regional accreditors are:

- **Accrediting Commission for Community and Junior Colleges, WASC (ACCJC)**
- **Higher Learning Commission (HLC)**
- **Middle States Commission on Higher Education (MSCHE)**
- **New England Association of Schools and Colleges—Commission on Institutions of Higher Education (NEASC)**
- **Northwest Commission on Colleges and Universities (NWCCU)**
- **Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)**
- **WASC Senior College and University Commission (WSCUC)**

See Appendix B for more information about the regions they serve and specific findings from each.

Federal Graduation Rates and Reporting

Integrated Postsecondary Education Data System (IPEDS) is the core postsecondary education data collection program for the National Center for Education Statistics (NCES). All U.S. postsecondary institutions that participate in federal financial aid programs are required to report IPEDS data. As stated on College Navigator, the overall graduation rate is also known as the “Student Right to Know,” or IPEDS graduation rate. It tracks the progress of students who began their studies as full-time, first-time degree- or certificate-seeking students, to see if they complete a degree or other award such as a certificate within 150 percent of “normal time” for completing the program in which they are enrolled. Students who already attended another institution or began their study at another institution are not tracked for this rate.

In September 2017, IPEDS was expanded to report graduation rates at 200 percent of normal time. The expanded IPEDS also includes alternative measures of success for students who are not only first-time, full-time students but also part-time and non-first-time (“or transfer-in”) students. These measures provide six- and eight-year award completion rates after entering an institution. Unlike the single and widely used IPEDS graduation rate, all institutions must report on their “transfer-outs,” regardless

of whether the institution has a mission that provides substantial transfer preparation. But while the data collected and reported have expanded, the definition of the IPEDS graduation rate has not changed.

College Navigator is the primary comprehensive consumer site that reports on all the expanded IPEDS graduation data to assist students, parents, high school counselors and others in obtaining information about 7,000 postsecondary institutions in the United States, its territories, and other countries. It offers a broad range of background information on programs offered, retention and graduation rates, transfer rates, aid available, campus safety, accreditation, and estimated student expenses, and shows what is happening with all students in an institution. (<https://nces.ed.gov/collegenavigator/>)

The College Scorecard was fully launched in 2015 by the U.S. Department of Education as a platform to provide consumer data on student demographics and entry requirements, information about cost of attendance, and a narrow range of measures to gauge institutional success. The College Scorecard uses Student Right to Know graduation rates that cover only first-time, full-time students with 150 percent time to completion. (<https://collegescorecard.ed.gov/>)

U.S. Department of Education Accreditation Dashboard and Performance Data by Accreditor (PDA). The Accreditation Dashboard highlights institutional outcomes for each type of accrediting agency as well as each individual accreditor. (See <https://www.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf>.) Using the Student Right to Know graduation rate as the primary data for institutional academic success, it identifies the number of colleges in each region that fit into five ranges of graduation results (> 80 percent, 60-80 percent, 40-60 percent, 20-40

percent, and 0-20 percent graduating). The summary also includes additional graphics on student earnings, loan repayment, and debt and net price.

The Performance Data by Accreditor tracks institutional performance for U.S. colleges and universities (<https://www.ed.gov/accreditation>). This is the data set used by C-RAC in 2016 for purposes of identifying institutions with low graduation rates.

(See Appendix A for non-federal data sources on graduation rates.)

To conduct their review, regional accreditors relied on surveys, interviews, additional information requested from institutions, and their own data analyses to ascertain graduation rates based on additional graduation data from the National Student Clearinghouse and other databases. Accreditors used these multiple

approaches to allow for a richer understanding of the meaning and limitations of the Student Right to Know graduation rate, to provide a more accurate and complete picture of student graduation outcomes, and to identify actions institutions are taking to improve their success in graduating larger percentages of their students.

II. Key Issues and Findings

1. What are the characteristics of institutions identified as having low graduation rates?

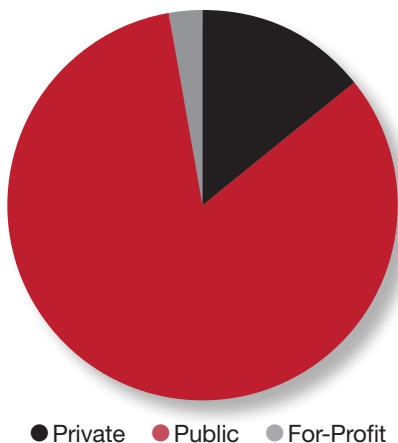
In July 2016, C-RAC identified a total of 397 two- and four-year regionally accredited colleges and universities that met its criteria for institutions with low graduation rates. These institutions comprised about 14 percent of the nation's more than 2,800 regionally accredited colleges.

About three-quarters of the institutions were open-admission, public, two-year colleges. About half (49 percent) of the institutions had enrollments where the majority of students were students of color.

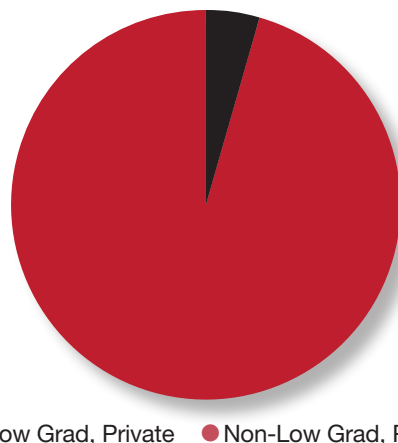
The charts on page 10 further highlight some key characteristics of these institutions.

- **83 percent of the institutions with low graduation rates were public; 14 percent were private, and 3 percent were for-profit institutions.**
- **The 329 public institutions comprised 22 percent of the nation's 1,533 public regionally accredited colleges and universities.**
- **The 57 private institutions comprised 0.5 percent of the nation's 1,219 private regionally accredited colleges.**
- **The 11 for-profit institutions comprised about 11 percent of the nation's 99 for-profit regionally accredited colleges.**
- **About three-quarters (76 percent) were predominantly certificate and associate degree-granting institutions.**
- **Forty-three percent of these colleges had enrollments where more than half of their students receive Pell grants. That compares with the national average of 21 percent of institutions that have the majority of students receiving Pell Grants.**

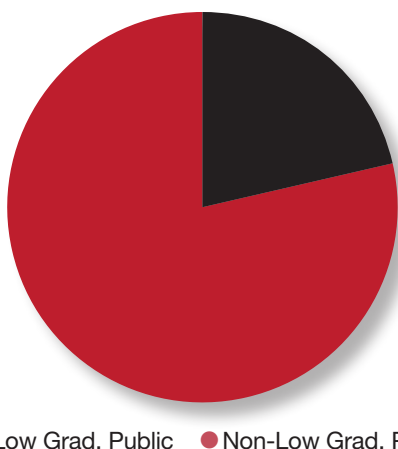
Low Graduation Institutions by Control



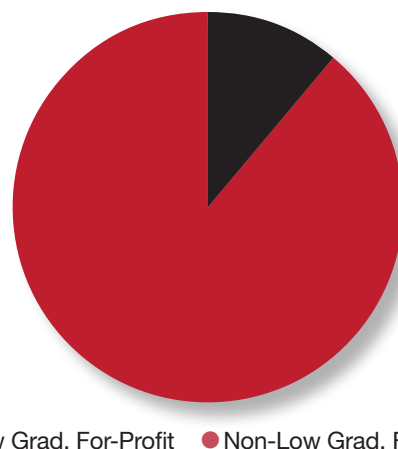
Low Graduation, Private Institutions as Share of All Private Institutions



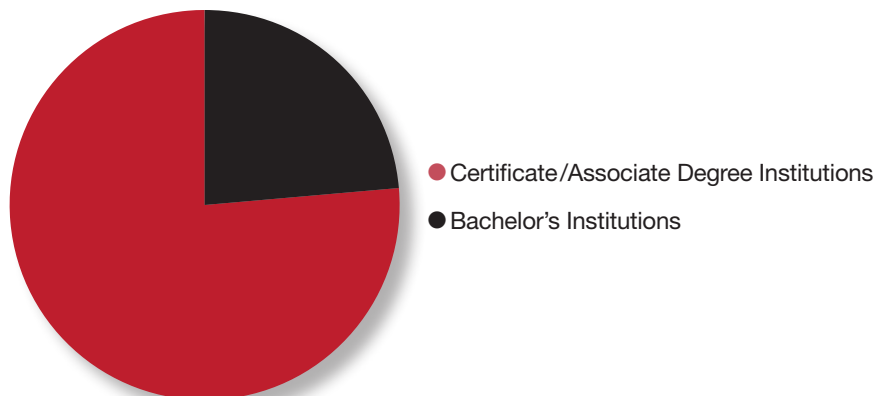
Low Graduation, Public Institutions as Share of All Public Institutions



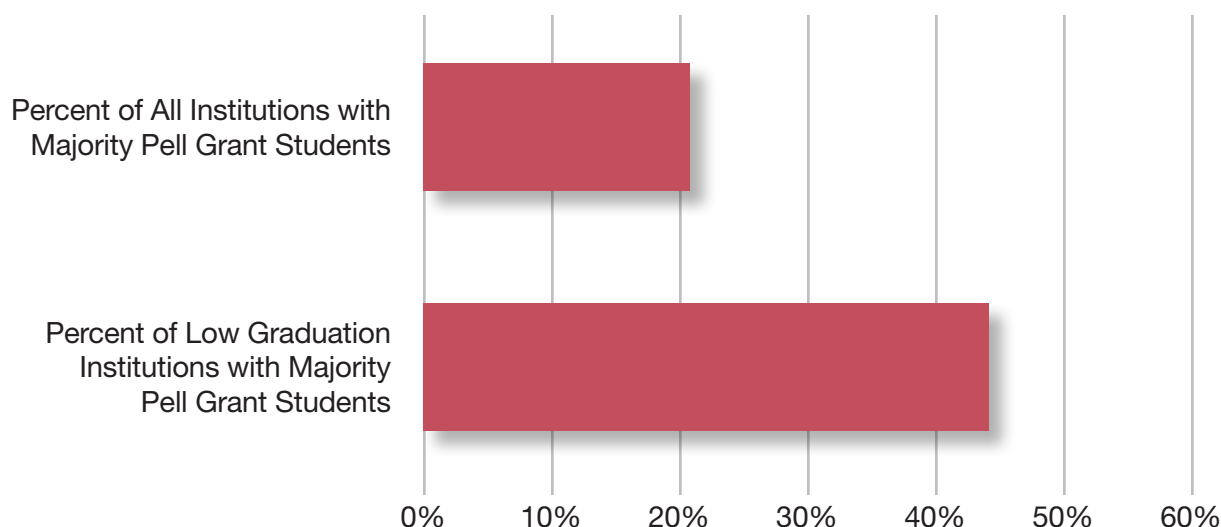
Low Graduation, For-Profit Institutions as Share of All For-Profit Institutions



Low Graduation Institutions by Predominant Degree



Pell Grant Students as Share of Total Enrollment



2. Do federal graduation rates used to evaluate colleges provide a complete and accurate picture of institutional success in helping students graduate from college? Are federal graduation rate data sufficient to reflect overall institutional quality?

The current Student Right to Know graduation rate, which focuses solely on first-time, full-time students is, in many cases, not sufficient to provide a clear picture of the percentage of students who graduate, particularly for open-access institutions. This rate is also not sufficient to enable students, the public, or accreditors to make informed decisions on the overall quality of an institution.

Where Federal Data Fall Short

The review found four key problems that skew federal graduation rates and muddle the picture of institutional performance. Specifically it found:

A. The widely used Student Right to Know graduation rate does not include information on students who were not first-time, full-time students or take into account the average time it takes students to graduate. Using graduation rate data posted on the U.S. Department of Education's website under Performance Data by Accreditor in 2016 and 2017, C-RAC found that 75 percent of the identified institutions have a majority of students who do not enter as first-time, full-time, degree- or certificate-seeking undergraduates, and thus would never be reflected in the Student Right to Know data.

Regional accreditors pointed out many institutions with low graduation rates in their regions where more than 80 percent of students were attending part time or previously had attended other institutions. C-RAC members noted that this factor alone skews graduation rate outcomes. For example, a Higher Learning Commission analysis found that the mean graduation rate of the colleges

Seventy-five percent of these institutions have a majority of students who do not enter as first-time, full-time, degree-seeking undergraduates. The students would never be reflected in the Student Right to Know data.

with low graduation rates increased from 19 percent to 33 percent when all students were included. WASC Senior College and University Commission analyzed 23 California State University institutions and found that the federal IPEDS Student Right to Know graduation rate dramatically underreported graduation rates by 3 to 32 percentage points, largely because the data did not include large groups of students (including non-first-time, non-full-time students) enrolled.

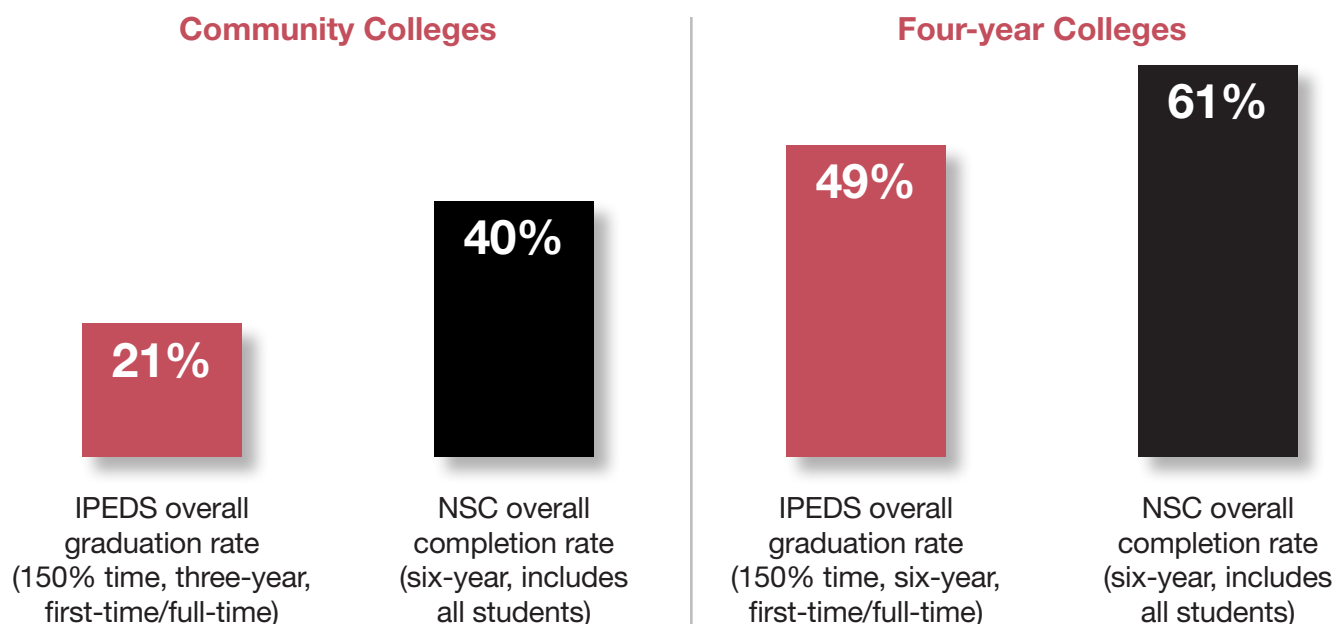
As with the size of the student cohort, the time it takes for students to earn degrees also affects institutional outcomes on federal graduation rates. The average elapsed time it takes community college students to complete their degrees is 5.6 years,¹ although the Student Right to Know graduation rate only captures students who graduate within three years.

Looking at the cohort of institutions identified in 2016, 311 were still identified as being below the C-RAC threshold in 2017 using 150 percent time. But using a six-year rate, which is more reflective of the actual time it takes community college students to graduate, only 101 institutions fell below the graduation threshold in that same year. *(See table on page 15.)*

In its analysis, the Southern Association of Colleges and Schools Commission on Colleges compared the Student Right to Know graduation rate with National Student Clearinghouse (NSC) data tracking the 2009 cohort.

The comparison indicates that community college graduation rates nearly doubled (from 21 percent using IPEDS to 40 percent using more inclusive NSC data that cover a longer time frame) and were 12 percentage points higher for four-year institutions in its region (moving from 49 percent using IPEDS to 61 percent using NSC data). The higher graduation rates using NSC data were far more reflective of the actual length of time in which many students complete than were the lower ones computed using the original IPEDS definitions.

What Percentage of Students Graduate? IPEDS Student Right to Know Graduation Rate vs. National Student Clearinghouse Rate (Southern Region)



Source: Southern Association of Colleges and Schools Commission on Colleges

B. The widely used Student Right to Know graduation rate does not recognize students who transfer in or out of institutions, while these students make up a significant portion of students at many of the colleges with low graduation rates.

Among the low graduation institutions identified, roughly 30 percent of the students who entered an institution in 2008 were enrolled in a different institution eight years later.

Kevin Carey of New America Foundation notes, in a 2017 *New York Times* article, that 510,000 students nationwide transferred before graduating

in 2016. Accounting for part-time students and tracking students over a longer period of time creates a more inclusive picture, and produces a graduation rate of 27 percent instead of 20 percent previously reported on IPEDS, Carey notes. Combining the transfer rate with the graduation rate creates a “combined average graduation and transfer rate [of] 60 percent nationwide.”²

This highlights the importance of recognizing the percentage of students who transfer, to give consumers a more complete and meaningful picture of community college success. While all transfers cannot be considered a “success” because not every

transfer leads to graduation, it is equally wrong to assume that a student who moves from one institution to another does NOT graduate, as is the case with the federal Student Right to Know rate.

C. Graduation rates for the same institutions vary by federal website.

As noted in a June 2016 *Washington Post* article highlighting this discrepancy, Montgomery College in Maryland had a 22 percent graduation rate on the College Scorecard, a 14 percent graduation rate on College Navigator, and a 17 percent rate on the Department of Education's accreditation website.³ Each of the numbers was correct according to different ways graduation rates are determined using federal data, which leaves consumers (and even national reporters who cover education) confused.

Not every single institution has widely varying rates and in many cases the graduation rates vary on different websites and databases by a few percentage points, but it is rare for institutions to have the same graduation rate across the federal sites that report the data. The variation is particularly pronounced for institutions that have small cohorts.

The difference may be justifiable, because the College Scorecard helps smooth out data over multiple years. Nonetheless, the discrepancies need to be better explained to consumers.

The number of institutions with low graduation rates varies also by federal reporting site and by the criteria used.

The chart on page 15 compares the number of low graduation institutions identified in 2016

using data from the Accreditation Dashboard/ Performance Data by Accreditor (PDA) database with data available in 2017 from the PDA, the College Scorecard (CS) and newly released outcomes data from College Navigator (CN).

The chart reflects that nearly a quarter of the institutions identified with low graduation rates in 2016 had rates high enough in the 2017 PDA data to no longer be identified. This demonstrates that even when using the same database from year to year, there is considerable variation in the institutions identified as having low graduation rates. (Although not highlighted in the chart, 368 institutions fell below C-RAC's criteria using the 2017 PDA.)

The chart also reflects a significant reduction (from 397 to 293) in identified institutions from 2016 to 2017 when using data from the College Scorecard. Although from different years, both data sets use the same criteria with respect to capturing only first-time, full-time students at 150 percent normal time to graduation. This is due in part to the fact that, on the Scorecard, graduation data is averaged over multiple years.

Specifically, the most significant shift in the number of institutions identified from 2016 to 2017 is when newly available outcomes data on College Navigator are being used.

- **Using 2017 first-time, full-time rates at 150 percent time on the College Navigator, the number of institutions identified as having low graduation rates drops from 397 to 226.**
- **Using six-year, first-time, full-time rates the number of institutions drops to 101.**

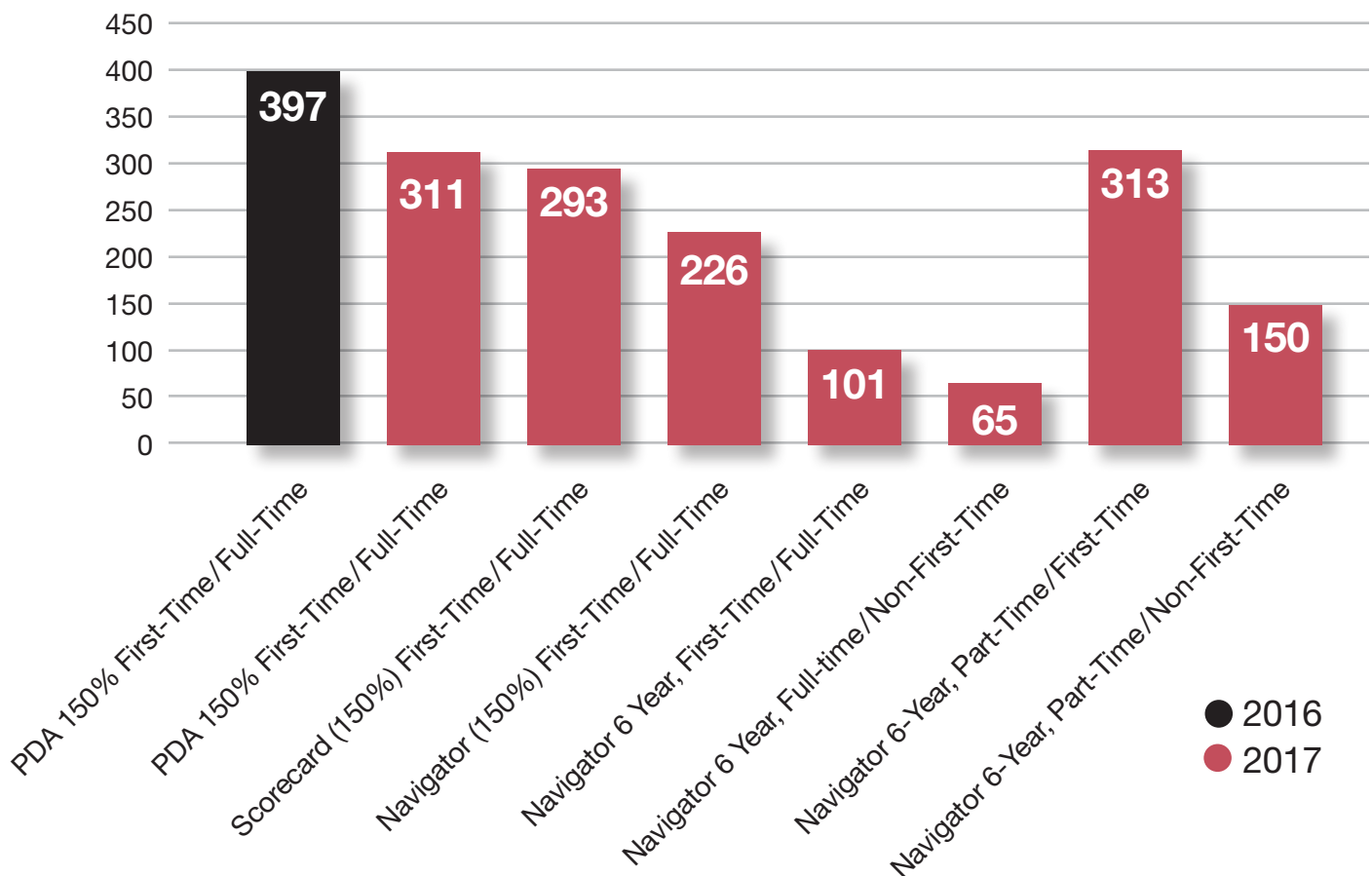
This reflects the importance of looking at longer-term outcomes, even if they go well beyond the normal time to completion.

- Looking at six-year, full-time, non-first-time students, the number of institutions identified drops to 65.

This demonstrates how critical it is to include non-first-time students in order to get a more complete understanding of student outcomes.

- Looking at six-year, part-time, first-time students, the number of low graduation-rate institutions is 313.
- Looking at six-year, part-time, non-first-time students (which represent a large percentage of students at the colleges under the C-RAC threshold, the number of institutions identified drops to 150.

Number of Institutions under the C-RAC Graduation Rate Threshold Based on Other Federal Graduation and Outcomes Data



This table assumes that any institutions for which new data were not available did not rise above the C-RAC threshold.

E. Graduation rate data, including Student Right to Know graduation rates, are “lagging indicators” that do not reflect improvements made by an institution within the previous five to seven years and thus are not suitable to serve as a single, “bright-line” indicator.

During the course of the review, institutions nationwide told their accreditors that one of the biggest limitations of federal graduation rate outcomes is that they are “lagging indicators.” The impact of institutional actions being implemented this year do not show up in graduation rate data for several years. For example, the first cohort of freshman that started in community college in fall 2017 would not appear in the federal system for three years and their information would not be publicly reported by the Department of Education until four years. With changes in the IPEDS graduation rates that track students over the longer period that is more reflective of the time it takes community college students to graduate, new IPEDS community college data will not appear for six years plus the additional year the U.S. Department of Education

needs to review and post the data on the College Scorecard or College Navigator.

Because graduation data lag behind real-time indicators such as course completion rates and retention rates, they provide institutions with little guidance to help interpret what is causing low graduation rates or to plan strategic action to increase retention and graduation. As such, institutions noted that they relied more heavily on other data—such as course completion and retention rates (*See page 27*)—used by accreditors in annual reviews as more useful in helping them make institutional improvements that can lead to higher graduation rates.

The impact of institutional actions being implemented this year do not show up in graduation rate data for several years.

3. To what extent and how do accreditors use graduation rates to measure institutional quality and to monitor and encourage improved graduation rate outcomes for institutions with low graduation rates? What additional steps will they take in the near future?

Regional accreditors have been using the Student Right to Know graduation rate and broader IPEDS outcome data as part of annual reviews and within other review cycles as a crucial measure of student outcomes beyond graduation. Accreditors supplement this information with other sources of non-federal graduation data to gain an even more complete picture of institutional results. Accreditors also are exploring new approaches—including predictive analytics, regional benchmarking, and research on different types of institutions—to help clarify graduation rates, to understand what institutions are doing, to identify best practices, to identify the impact of changes they are implementing, and to accelerate progress.

Regional accreditors used the Graduation Rate Information Project as a chance to review further what is happening at institutions with low graduation rates. The process regional accreditors took was somewhat similar across each region. Accreditors alerted institutions that they were conducting a special review, requested and analyzed data and information, asked institutions what steps they were taking to make progress, and followed up with institutions that could not adequately explain their situation or actions. Accreditors continue to monitor these institutions to determine if they are making progress. Many

accreditors conducted special analyses to supplement their understanding.

For example, the Higher Learning Commission conducted two surveys to ascertain what was happening with low-performing institutions and to compare actions taken with a large number of higher-performing institutions. To better understand its own schools and to create a comparison group of higher performing schools, HLC included more schools than the original C-RAC list of colleges. The first survey, conducted in fall 2016, explored institutions with graduation rates (defined as at or below 15 percent for two-year institutions or at or below 25 percent for four-year institutions and also included institutions at or below one standard deviation threshold in each Carnegie classification). It included 187 HLC institutions (mean graduation rate of 18 percent).

In addition to conducting a special review, regional accreditors conducted additional research to supplement their understanding of graduation rates.

The second survey, of institutions with moderate to high graduation rates in each Carnegie classification, was conducted in spring 2017. It included 175 randomly selected HLC institutions (mean graduation rate of 61 percent).

Each survey had identical questions, allowing for comparisons of information across types of institutions. Both quantitative and qualitative methods were used to perform the analyses. Findings of what they observed are answered in question four on pages 24 to 25.

The Southern Association of Colleges and Schools Commission on Colleges uses the Student Right to Know graduation rate across the region but, in order to get a more accurate view of graduation rates, SACSCOC received permission from each of its member colleges to compare federal graduation rates with National Student Clearinghouse data. The research examined more than 550 institutions (70 percent of the Association’s membership) and included a survey exploring what institutions are doing to improve retention and graduation rates.

The Middle States Commission on Higher Education (MSCHE) reviewed the most recent IPEDS first-time, full-time data and requested additional context from the 42 institutions whose graduation rates fell below the C-RAC threshold. These institutions were provided with IPEDS trends over the past five years and each was asked for information about the data on their institution, what the institution was doing to improve graduation and retention, and how specific factors—such as institutional mission, student demographics, and student barriers to graduation—affected current graduation rates. Findings from this analysis are identified in question four on pages 26 to 27.

MSCHE is transitioning from reliance on a single “catch-all” instrument which annually gathers a variety of institutional data to an

approach that focuses not only on measures of student success but also on institutional contexts—e.g., type of institution (including open access), available resources, type of student (including adult returning, primarily part time) that produce those results. MSCHE is now requiring what it believes to be more useful data and is devoting the resources necessary to analyze and provide feedback concerning trends (rather than examining a single year without context).

The Commission on Institutions of Higher Education of the New England Association of Schools and Colleges contacted institutions that had graduation rates at or under the threshold and asked them to submit a seven-page report addressing four questions:

- Is the institution’s Student Right to Know graduation rate accurate?
- Are there other data about retention rates, graduation rates, and other measures of student success that you want to provide?
- What efforts are under way now at your institution to support students to graduation and how effective are those efforts?
- What additional efforts is your institution planning to undertake in the near future?

Based on its review of the 28 institutions, NEASC placed each into one of four groups:

- Eleven institutions provided clear evidence that the college understands its students, uses mission-appropriate measures of student success, and is implementing additional support initiatives. The recommendation for these institutions was to thank them for their report and to encourage them to keep up the good work.

- Seven institutions were already in the midst of developing progress reports or some other kind of follow-up about student success that NEASC previously requested.
- Seven institutions, the Commission found, had submitted reports that lacked important student data, along with specifics about efforts to improve graduation or retention. These institutions were asked to address these matters in an upcoming report.
- Three institutions were asked to file a special report. At one of these schools, NEASC conducted a site visit to better understand what was happening.

The New England regional accreditor then convened a committee of peers to review the reports and make recommendations for further action to the full Commission. The Commission has a broad range of actions it can take—from continuous monitoring to withdrawing accreditation—if institutions do not demonstrate that they are paying sufficient attention to graduation and retention. The committee determined that the institutions were aware of—and addressing—their specific concerns related to retention and graduation rates (but with varying levels of analysis and programmatic follow up). The Commission will continue to monitor their progress.

Other accreditors used annual reporting data in addition to their periodic institutional reviews to more closely monitor progress of institutions below the C-RAC threshold, and are continuing to follow up with institutions.

As part of its regular accreditation process, ACCJC requires each member institution to set student achievement goals in the context of its

mission, demographics, and program mix. These goals are expected to reflect realistic aspirations for improvement. As an aspect of a comprehensive review, peer evaluators inquire how these goals were set and comment on the effectiveness of the initiatives undertaken to achieve them. A concluding element in the institutional self-study is the creation of a “Quality Focused Essay” (QFE) that sets specific long-term strategies, timelines, and structures for

Commissions have a broad range of actions they can take—from continuous monitoring to withdrawing accreditation—if institutions do not demonstrate that they are paying sufficient attention to graduation and retention.

improving student achievement. The review team then comments on the inclusiveness and likely effectiveness of the QFE’s actionable plans. As part of its approach to help the region understand what is working to improve graduation rates, the Commission is using these QFE narratives and related data to identify good practices for sharing among colleges and universities in the region.

What accreditors are doing to measure progress in graduation and other key outcomes

Graduation rates are a crucial indicator of institutional success, but regional accreditors

are careful to gain a more complete picture of student outcomes by monitoring graduation rates alongside other indicators.

The WASC Senior College and University Commission (WSCUC) emphasizes the need for institutions to measure student success, including student retention, progress towards a degree, and graduation rates. WSCUC established the Graduation Rate Dashboard (GRD), a highly inclusive measure to identify the enrollment, retention, and graduation patterns of all undergraduate students—regardless of how they matriculate (first-time or transfer, lower- or upper-division) or enroll (part-time, full-time, or swirling—taking courses from different institutions over time or during the same semester), or of what programs they pursue. The Graduation Rate Dashboard captures all graduating students, including those who attend part time or take more than six years to complete their programs.

The Accrediting Commission for Community and Junior Colleges (AACJC) puts a great deal of emphasis on course completion, institutional retention, and student persistence and completion. It requires each institution to submit annually a comprehensive essay that reviews data, improvements, and progress.

In the Northwest, the entire region has focused increasingly on using measures of student learning and engagement as an improvement strategy to support increases in graduation rates. The Northwest Commission on Colleges and Universities notes that institutions are weaving together a broad range of general education assessments—including embedded course assessments, upper-division writing assessments,

measures of student engagement, and the value the college added to student knowledge—to provide information about institutional performance that goes beyond graduation rates.

As already noted above, the Middle States Commission on Higher Education is moving to a multifaceted approach to student success and the institutional contexts that produce results, and ensuring that reporting on student outcomes must happen every year to provide information that is timely, to demonstrate progress and guide improvement efforts.

The New England Association of Schools and Colleges recently adopted new standards that address student success in a number of ways, including student learning assessments and means to track the percentage of students who go on to baccalaureate, advanced, or professional degrees. Data used in the comprehensive and interim evaluations address such matters as the average starting salaries of graduates, the percentage of students passing licensure exams, and other measures that are particularly appropriate to the mission of an institution. For example, a college of music reports the percentage of its graduates who make a significant portion of their living from their music. A comprehensive state university provides information on how many graduates find employment within the state.

Accreditors will continue to study graduation rates and make improvements

In 2018, regional accreditors will continue to study how institutions can improve completion and graduation outcomes, explore predictive analytics and benchmark how institutions compare with

peer institutions, conduct additional surveys and research and disseminate what they learn, and provide more training for institutions in supporting improvements in graduation outcomes.

The Accrediting Commission of Community and Junior Colleges plans to launch training and information sessions to share information it gathers about promising practices across its region based on institutional reporting on key outcomes, improvement efforts, and progress.

Accreditors will further study what institutions are doing to improve, conduct more research, explore predictive analytics, and benchmark how institutions compare with their peers.

WASC Senior College and University Commission is continuing to experiment with predictive analytics—identifying and studying the gap between predicted rates of performance and actual rates—to ensure that all institutions are improving or have the tools to move forward.

The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) continues to use its research capacity to learn more about institutional graduation rates and strategies for improvement. With funding from the Lumina Foundation, SACSCOC will identify and demonstrate ways that quality certificates

can be a key part of a credentials ladder to help increase the number of students earning high-quality postsecondary degrees or credentials. The project will survey colleges in the region and identify many types of entry-level programs that are typically not viewed as building blocks to other credentials nor are within the domain of traditional, degree-granting institutions. These programs include: phlebotomy/medical assistant certificates to registered nurse degrees; legal secretary certificates to paralegal degrees; small business certification to business administration degrees; and IT certifications and coding camps to information technology degrees.

The survey also will identify current programs and initiatives at SACSCOC institutions which facilitate and accept work/skills from non-traditional training programs, including apprenticeship programs, industry-based training programs, and non-accredited proprietary programs. It also will include entry-level certificate programs (and other short-term programs) offered by the institutions themselves, which are traditionally viewed as discrete credentials and do not lead to enrollment in other programs. SACSCOC will work with 25 institutional grantees to assess the development and/or creation of new bridging programs, and it will share lessons learned at its annual meeting in December 2018.

The Northwest Commission on Colleges and Universities (NWCCU) is starting a pilot project with the National Student Clearinghouse to gain more accurate information about graduation rates in the region and efforts to improve them. Based on a recently completed demonstration project

that brought together four diverse institutions to examine the effectiveness of their general education programs, institutions have expressed strong interest in using an institutional cohort model to enable them to learn from one another's retention improvement initiatives. In addition, the Commission has added four questions about graduation rates to its comprehensive review process. The questions are the following:

1. What are the key challenges of the institution related to the institution's graduation rate and other data provided?
2. What is the institution doing to improve graduation rates?
3. What initiatives appear to be effective in improving graduation rates?
4. What might accreditors do to assist institutions to improve graduation rates?

The Higher Learning Commission will continue to evaluate the data from its previously noted survey, along with the findings from a student success initiative over the next two years to define and test other measurement tools for retention, persistence, and completion. This effort is supported by a grant from the Lumina Foundation that is helping HLC work with 18 institutional partners to set the parameters for testing which research variables best measure student success. It is working with states, researchers, and stakeholder groups to create a glossary of terms and clarify key issues related to retention, persistence, and completion. HLC intends this year to publish a white paper of the collective findings and develop a comprehensive plan outlining how HLC should evaluate institutions' student success outcomes.

The Middle States Commission on Higher Education has taken a multi-pronged approach that has included a review and renewal of its standards and accreditation processes, and the development of a robust information technology infrastructure to support its newly created dedicated research and data analytics unit. The renewed standards more clearly define what the Commission and its members consider to be foundational to institutional improvement and student success. Guided by this sharpened focus, annual data gathering has been streamlined to include current (and evolving) key indicators that review trends rather than a single-year's performance.

In addition, MSCHE's data analytics capacity will allow for a multivariate analysis of the many elements that potentially contribute to student success. Findings may then serve as a foundation for the development of potential predictors of student success. The acquisition of a much more robust technology and software platform will enable MSCHE to share research findings with each of its institutions, further strengthening opportunities for discussion and feedback focusing on the role of accreditation and peer review in improving student success.

NEASC will continue to use its process for reviewing the reports submitted by institutions to determine whether the institution demonstrated its understanding of student progression rates (going beyond those for first-time, full-time students) and has in place significant and appropriate measures to help promote student success. NEASC has also revised its standards and introduced a new workshop to help institutions enrich how they report rates of progression and

graduation as well as other significant measures of student success. Also, in 2018, NEASC will explore the new IPEDS outcomes data and will review any institutions that do not meet the 15 percent/25 percent threshold this year that were not reviewed last year, thus providing an empirical review of the above-noted limitations in federal graduation rates.

4. What challenges do leaders of institutions with low graduation rates say they face when addressing graduation rates? To what extent have accreditors observed institutions taking steps to improve their graduation rates?

Challenges institutions face

As noted earlier, 43 percent of the institutions with low graduation rates had the majority of students who are low-income (receiving Pell grants) and about half had enrollments in which the majority of students are students of color. Research shows that low-income and black and Latino students, regardless of the type of institution they attend, are less likely to graduate or graduate on time than their peers.⁴ Because all institutions (including colleges with high graduation rates) struggle to graduate students from these populations, accreditors believe that all colleges need to do a better job to help these subpopulations graduate. But colleges that have a mission to serve low-income, first-generation, and minority students face more challenges than other colleges in facilitating graduation.

As accreditors reached out to institutions with low graduation rates, many cited that more of today's college students than ever face

nonacademic challenges that make it difficult for them to finish a degree on time. In many cases, they work; they have children; they have family members who need care; they have health issues; they are concerned about being deported or about a family member being deported; they have financial issues; their mastery of the English language is not what it could be; or their prior education did not prepare them well for the rigors of collegiate-level work.

Although financial information for colleges identified in the C-RAC project was not collected, many cited declining institutional resources as a result of state disinvestment as another challenge they face in working to improve graduation rates. Generally speaking, institutions with low graduation rates are among the least well supported. The per-student expenditures at community colleges and historically black colleges and universities (HBCUs) are generally lower than at flagship public institutions and well-endowed independent institutions, as documented in a 2017 study by the Center on Budget and Policy Priorities. Further, the study found that state institutional support after adjusting for inflation had decreased by \$9 billion in the decade following the Great Recession in 2008 in spite of increases in recent years. The Center's study also found that at least 44 states spent less in the 2017 school year than in 2008.⁵

How institutions are addressing graduation rates

Institutions are keenly aware of their graduation rates and most are taking significant steps to improve them.

Accreditors across all regions noted that institutions below the C-RAC threshold are making numerous organizational, curricular, and infrastructure changes to better address the needs of their students. These changes include introducing:

- **Targeted pre-college orientation, and/or first-year-experience programs;**
- **Institutional reorganization** focused on student services and other institutional departments;
- **Curriculum revision**, including curriculum mapping intended to provide students with a “critical path” to completion;
- **More proactive advising practices;** and
- **Efforts to accelerate time to degree** via reduction of credits required and/or integrating developmental work into credit-bearing courses.

According to the Accrediting Commission of Community and Junior Colleges (ACCJC) and other regional accreditors, community colleges in particular are focused on revamping developmental education to ensure that students can move more quickly from reviewing content that they never mastered in high school to gaining traction to degrees through credit-bearing courses. These approaches have been supported by national organizations, such as the American Association of Community Colleges (AACC) and Achieving the Dream (ATD), to help improve college completion. The association is leading the AACC Pathways Network, which helps institutions redesign and realign programs, support services, and instructional approaches to enable students to achieve their career and academic goals, and the

Voluntary Framework for Accountability (<https://vfa.aacc.nche.edu/>), which seeks to define the most appropriate metrics for gauging how well community colleges serve a variety of students and to benchmark student progress and completion data against peer institutions.

Achieving the Dream, a network of nearly 200 reform-minded community colleges, helps

Institutions are taking significant steps to improve graduation rates and are using numerous outcome measures to ascertain progress and make improvements.

institutions build their capacity in key areas that research indicates help improve college completion and student success beyond graduation. These and other multi-institutional efforts are funded by national philanthropies, such as the Lumina Foundation and the Bill and Melinda Gates Foundation, and regional funders seeking to improve outcomes across the states they serve.

Aware of the challenges they face, institutions with lower graduation rates are developing specific plans for improving completion. A large-scale survey conducted by the Higher Learning Commission found, as might be expected, that they are more likely to take action to monitor graduation and program completion rates and set specific

targets than are high graduation rate institutions, which nonetheless continue to make adjustments to help even more of their students succeed.

The HLC analysis included in this study, for example, found that institutions below the threshold were more likely than institutions with high graduation rates to:

- **Monitor course completion rates of their students** (77 percent low graduation rate institutions vs. 64 percent high graduation rate institutions);
 - **Monitor the transfer-out rate of students** (69 percent low graduation rate institutions vs. 47 percent of high graduation rate institutions);
 - **Set a target graduation rate** (67 percent low graduation rate institutions vs. 33 percent high graduation rate institutions); and
 - **Monitor the graduation rate of students who are not included in the IPEDS graduation rate** reported to the U.S. Department of Education (64 percent low graduation rate institutions vs. 54 percent high graduation rate institutions).
- **Introducing pathways programs** that provide an integrated, institution-wide approach to student success by creating structured educational experiences that support each student from point of entry to attainment of high-quality postsecondary credentials and careers;
 - **Revamping developmental education** to help students learn content that they never mastered in high school and to make it possible for them to earn course credits sooner to accelerate time to degree;
 - **Revising “gatekeeper” courses**, the first or lowest-level college-level course students take in a subject such as mathematics, reading, or writing, often following completion of one or more developmental courses in that subject;
 - **Improving student advising**; and
 - **Upgrading student services** to address common barriers to higher education and to increase academic success and college completion.

What institutions with high graduation rates are doing to improve their rates

The Higher Learning Commission (HLC) survey responses of leaders of institutions with high graduation rates and reviews by the New England Association of Schools and Colleges and the Northwest Commission on Colleges and Universities indicate that institutions with high graduation rates are implementing systemwide changes, such as:

Institutions with high graduation rates appear to address problems more systemically and with large-scale, institution-wide initiatives than do institutions with low graduation rates.

The Higher Learning Commission noted in its analysis that institutions with high graduation rates appear to address problems more systemically (as an institution-wide concern) than do institutions with lower graduation rates, which tended toward smaller initiatives to address student success.

What all institutions across a region are doing to increase graduation rates

In this study, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) found similar types of changes across its region, and tried to quantify some of them. Researchers collected 5,344 “mini-stories” of institutions’ efforts to support and facilitate student completion, allowing them to document and categorize the significant activities designed to improve graduation and retention. Broadly, the SACSCOC Peer Review Advisory Board saw institutions generally focusing on bolstering advising, implementing early warning systems and predictive data analytics, revamping

Researchers in one region collected 5,344 “mini-stories” of institutions’ efforts to support and facilitate student completion.

orientation, redesigning courses, introducing bridge programs from high school to college, and introducing residential life activities. On average, each institution reported about eight significant

ongoing activities. Overall, some 85 percent of the more than 700 institutions in the Southern region reported that they are doing at least five different things to address graduation rates.

SACSCOC further identified a broad array of interrelated implementation approaches being introduced across its institutions. These included changes in:

- **Policies and procedures** to address key issues, including accelerating time to degree and expediting entry into college-level courses or improving student success in specified courses in particular subject areas; introducing stackable credentials in vocational/tech areas; and developing policies to enable students to re-take classes and have their last grade count toward their cumulative GPAs.
- **Programs, structures, and personnel** to support student success, such as introducing mandatory advising, orientation, and summer bridge programs; designing special initiatives to improve the success and completion rates for specific subpopulations; and establishing academic success centers or math centers with full-time tutors and centralized “one-stop shop” student support centers.
- **Use of software/technology**, including installing new software in key areas such as improving student planning, scheduling, and registration, and establishing early warning systems to “flag” students who appear to be falling behind in their academic work or exhibiting behaviors that may lead to failure.

- **Use of data and institutional research analytics** (which virtually always involves software and focuses on analyzing data for a specific purpose). This includes: monitoring and tracking student satisfaction and needs to identify priorities and gauge institutional response; expanding technology-based advising models to create early warning systems to enable more timely interventions; and using predictive analytics as part of advising.
- **Professional development**, including long-term faculty development to build communities of practice, bolster faculty leadership, and share best practices to support first-generation students. Institutions also are introducing short-term faculty development to help instructors better predict, assess, and address student success issues in gateway classes.

Colleges are using a broad array of outcome measures, including alternative graduation measures, to make improvements.

In recent years, regional accreditors have refined their standards and processes to push institutions to report annually key evidence of success—graduation rates and other measures that provide actionable information for making changes and improvements. This reporting also helps institutions gather data that are of special interest to members of Congress and that help consumers and public officials understand the value that students gain from their education.

Institutions annually report to accreditors data that helps consumers and policymakers understand the value that students gain from their education.

Institutions told accreditors that efforts to move from requiring periodic reporting over a number of years to establishing a more frequent and, in some cases a more focused, approach to annual reporting about student outcomes has been an impetus to strengthen their research capacities, use data in decision making, and take action.

Among the most common and useful measures are:

- **Course completion rates**—the percentage of students who earn course credit out of the total number of students who attempt courses;
- **Retention rates**—the percentage of students who complete a program or maintain enrollment at their first institution;
- **Alternative, non-federal, graduation rate data**, such as from the National Student Clearinghouse and
- **Other measures of institutional success**, such as transfer from community colleges to four-year institutions, placement rates into professional and advanced degree programs, and employment in fields central to the mission of the institution.

5. What further actions do regional accreditors recommend that the federal government, accreditors, and institutions take to improve tracking and reporting of accurate graduation rates as well as to improve graduation results?

At the federal level, the U.S. Department of Education needs to reduce confusion on graduation rates by making consistent and current the information that appears on College Navigator, College Scorecard, and the Accreditation Dashboard. This should include drawing attention to why rates may be different on different websites and highlighting in the College Scorecard the size of cohorts and the percentages of students included. For many reasons cited in this report, the Department and Congress should not introduce bright-line accountability measures based on complicated graduation rates, but ensure that graduation rates are buttressed by other important measures of student outcomes that help explain institutional quality and provide actionable information that helps institutions be accountable and improve.

While accreditors continue to conduct research as they scrutinize institutions with low graduation rates, federal policymakers can encourage accreditors and institutions to continue to make

progress by investing in research to pinpoint the most effective strategies and innovations, and by helping institutions implement them.

Regional accreditors must continue expanding innovations such as predictive analytics and developing approaches to benchmarking progress across similar types of institutions. Regional accreditors also can expand their research on what is working to improve graduation rates at institutions, and to improve communications with students and the public about how accreditation works and why they sometimes accredit institutions with low graduation rates. As part of this effort, they can demonstrate that many institutions with low graduation rates are making significant improvements. Equally important, accreditors need to ensure that the discussion of graduation rates and completion continues to be part of all reviews and needs to more clearly hold institutions with persistently low graduation rates accountable.

Colleges and universities need to continue to increase their focus on improving graduation rates by adopting initiatives that have been found to be effective. They can improve communication with students and the public regarding their own graduation rates and work with accreditors and other colleges to benchmark their progress with similar institutions.

III. Conclusion

Growing interest in graduation rates has led to improvement in graduation data. Regional accreditors are using the best available data about graduation and other outcomes to hold institutions accountable, determining the combination of improvements, heightened oversight, or sanctions that are warranted. Accreditors have bolstered their research capacity to spot trends, benchmark colleges against peer institutions, and to use tools, such as predictive analytics, to compare outcomes that might be expected based on characteristics of the institution against actual results. Accreditors will increasingly study institutional improvement strategies and their impact on graduation and retention rates. Based on these activities and sanctions accreditors impose due, in part, to poor student outcomes, accreditors have put institutions on notice that oversight and monitoring is real, ongoing, and that they will take appropriate action as needed.

The report also raises difficult questions. What is the best way to gauge graduation rates? How can the federal government, accreditors, and institutions use graduation rates along with other measurements to create useful, transparent, and comprehensible measures that accurately portray the quality of an institution? Which strategies for improvement hold the most promise? Are these strategies enough, and if not, how can the federal government, accreditors, and institutions spark more powerful innovation?

The nation's regional accreditors are seeking answers to these questions. Accreditors and institutions recognize that, while institutional

graduation rates at open-access institutions may be higher than previously understood, they are not high enough. Accreditors are fully committed to helping their regions and individual institutions improve their graduation rates and to help policymakers in their efforts to improve graduation rate measures and hold institutions accountable.

In doing this work, regional accreditors recognize that, while holding institutions to high standards and monitoring performance are crucial, the hardest work must come from the institutions themselves. To address the many barriers that institutions and their students face, colleges and universities need expertise and information about what is working and not working at institutions like theirs.

By codifying and evaluating what is happening at different institutional types, and through the rigorous process of peer review, regional accreditors seek to make sure that improvements take hold and make a difference in student outcomes. To that end, accreditors have paid special attention to graduation rates as well as, through the creation of rigorous standards, to ensuring that leadership, governance, resource allocation, instruction, academic and student-support programs, and the overall execution of improvement efforts at each institution, lead to better outcomes, including a larger percentage of students who graduate.

As colleges continue to develop and fine-tune their improvement strategies, regional accreditors will continue to monitor these efforts and to provide policymakers with information about what they are learning from monitoring and research.

IV. Appendices

Appendix A

Non-Federal Data Sources on Graduation Rates

The National Student Clearinghouse (NSC)

works with colleges and universities to collect institution-level completion rates. Enrollment and postsecondary credential records are submitted by institutions to the National Student Clearinghouse Research Center on a regular (and voluntary) basis as part of the organization's enrollment reporting and degree-verification services. NSC rates include full- and part-time students and are not limited to degree-seeking students. Degree completion includes completion of educational certificates, postsecondary diplomas, associate degrees and bachelor's degrees.

The Graduation Rate Dashboard (GRD) is a highly inclusive measure that was developed by WSCUC to identify the enrollment, retention, and graduation patterns of all undergraduate students—regardless of how they matriculate (first-time or transfer, lower- or upper-division) or enroll (part-time, full-time, swirling—taking courses from different institutions over time or during the same semester), or of what programs they pursue. The

GRD captures all graduating students, including those who attend part time or take more than six years to complete their programs.

The Student Achievement Measure (SAM), an alternative, voluntary methodology for reporting undergraduate student progress and completion, was developed in 2013 through a partnership of the six national higher education presidential associations. SAM currently includes two reporting models: one for students seeking a certificate or associate degree and one for students seeking a bachelor's degree. The SAM bachelor's model annually reports the award and enrollment status for up to four cohorts of degree-seeking undergraduate students (full-time, first-time; full-time, not first-time; part-time, first-time; and part-time, not first-time). Charts appearing on the SAM website display, across multiple institutions, outcomes at three points in time (two, four, and six years from the point of enrollment for full-time, non-first-time students; four, five, and six years from the point of enrollment for full-time, first-time students; six, eight, and ten years from point of enrollment for part-time students).

Appendix B

Summary of Regional Accreditors' Actions

This section identifies the steps regional accreditors have taken to investigate institutions and the observations accreditors made based on information from institutions or additional research and analysis.

Accrediting Commission for Community and Junior Colleges (ACCJC)

ACCJC accredits 133 institutions in California, Hawaii, Nevada, and the Pacific Region (American Samoa, the Commonwealth of the Northern Mariana Islands, the Federated States of Micronesia, Guam, the Republic of the Marshall Islands, and the Republic of Palau). The Commission is the only regional accreditor focused exclusively on two-year institutions.

ACCJC reviewed performance at 10 institutions below the graduation rate threshold, explored how institutions gather data, and worked with them to review the context of their graduation rates.

ACCJC Observations

More than nine in 10 (94 percent) of the colleges it accredits are public open-access colleges, which enroll virtually all (99 percent) of the 1.6 million full-time-equivalent community college students in the region. As a result, the demographics of this population present distinct challenges to the expectation that students will graduate in three or four years. For example, there are significant numbers of part-time (with 58 percent taking fewer than six units), working, first-generation, and certificate-seeking students. More than 40 percent are over the age of 25. Many are English language

learners or are underprepared products of low-performing high schools; 47 percent are enrolled in remedial English. In some urban community college districts, as many as 20 percent of students identify themselves as homeless. Many students deal with other poverty-related issues, such as food insecurity, inconvenient and expensive commutes, and limited or no access to the internet at home. Often there are expectations that they support and care for other family members, especially among large migrant farmworker populations.

At some colleges, as few as 15 percent of students are first-time, full-time freshmen; Student Right to Know data do not capture the rest of them.

Many students who transfer to four-year institutions do so without obtaining an AA/AS degree and thus are not counted as graduates in Student Right to Know data.

So it is no surprise that on average the graduation rates for community colleges nearly double when using the California Community College Scorecard, which is based on a six-year graduation rate, rather than the three-year measure used by IPEDS. For example, according to the federal Student Right to Know graduation rate, one ACCJC community college has a graduation rate of only 14 percent. But the rate is actually twice that number (27 percent) using the six-year measure that also includes a significantly larger cohort of students.

In the California public community college system, 76 percent of degree- or certificate-seeking transfer students enroll in three successive terms from their first matriculation. Almost half (48 percent) of them achieve their academic goals within six years.

As part of its regular accreditation process, ACCJC requires each member institution to set student achievement goals in the context of its mission, demographics, and program mix. These are expected to reflect realistic aspirations for improvement. As an aspect of a comprehensive review, peer evaluators inquire how these goals were set and comment on the effectiveness of the initiatives undertaken to achieve them. A concluding element in the institutional self-study is the creation of a “Quality Focused Essay” (QFE) that sets specific long-term strategies, timelines, and structures for improving student achievement. The review team then comments on the inclusiveness and likely effectiveness of the QFE’s actionable plans. As part of its approach to help the region understand what is working to improve graduation rates, the Commission is using these QFE narratives and related data to identify good practices for sharing among colleges and universities in the region.

As an accrediting body, ACCJC works in concert with multiple initiatives to drive improvements in student achievement. Common across the region have been efforts by institutions and states to revamp developmental education, which students often pursue while taking regular courses to accelerate the learning process.

California has gone even further than other states. The Chancellor’s Office of the California Community Colleges, for example, has set ambitious goals for increasing the annual percentage of students who earn associate degrees, credentials, and certificates, or acquire specific skill sets that prepare them for an in-demand job—and for increasing the number of California community

college students who transfer to a University of California or California State University campus. The chancellor’s community college improvement plan also calls for boosting the number of students who complete career education programs and find a job in their field of study, and for closing achievement gaps between a) low-income students and students of color and b) all other students. As part of this effort, the community college system has devoted more than \$200 million to multiple systemwide initiatives. The California Guided Pathways project, for instance, creates structured educational experiences that support each student from point of entry to attainment of high-quality postsecondary credentials and employment in a chosen field. The effort enables colleges to clarify paths to student end goals, aids students in selecting a program of study and staying on the path, and helps ensure quality learning.

ACCJC member colleges in Hawaii also set annual targets for graduation and other success rates and track achievement on a public dashboard. In 2016, five of the seven community colleges exceeded their 2013 baseline data on these measures; five also exceeded their targets for the number of degrees or certificates awarded. Improving these numbers is the first priority of the system’s strategic plan.

Higher Learning Commission (HLC)

HLC accredits more than 1,000 institutions and is the largest of the regional accreditors in the overall number of both states and institutions. It oversees the accreditation of degree-granting colleges and universities in 19 mostly Midwestern and South-Central states: Arizona, Arkansas, Colorado,

Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming.

The HLC conducted two surveys. The first, of institutions with low graduation rates (defined as at or below 15 percent for two-year institutions or at or below 25 percent for four-year institutions, and at or below one standard deviation threshold in each Carnegie classification), was conducted in fall 2016. It included 187 HLC institutions (mean graduation rate of 18 percent).

The second survey, of institutions with moderate to high graduation rates in each Carnegie classification, was conducted in spring 2017. It included 175 randomly selected HLC institutions (mean graduation rate of 61 percent).

Each survey had identical questions, allowing for comparisons of information across types of institutions. Both quantitative and qualitative methods were used to perform the analyses.

HLC Observations

HLC found that Student Right to Know graduation rates alone do not provide an accurate picture of student success. The mean graduation rate for low graduation rate colleges and universities increased from 19 percent, according to the Student Right to Know rate, to 33 percent when all students were included.

College officials across all types of institutions, except for four-year colleges with high graduation rates, identified declining resources as the biggest challenge they face to increasing retention and graduation rates. About half

of responding high and lower graduation rate institutions noted a decline in funding, specifically state and local funding—which college officials say limits their ability to support student success. The second most significant challenge was lack of student preparation at two- and four-year schools below the threshold, and at two-year, high-performing schools. Four-year colleges with high graduation rates also cited the high cost of an education and lack of access to aid as significant barriers to completion.

In noting that demographics, student ability to pay, and inadequate resources are crucial factors that affect graduation rates, college officials are not making excuses. Even the most high-performing institutions in the HLC region, including some of the nation's elite public colleges, struggle to raise graduation rates for low-income and first-generation students and students of color.

Officials do cite some positive trends: increased transfer of community college students to four-year institutions; participation in national reform networks, such as Achieving the Dream; improved research, data gathering, and strategic planning; focus on the first-year experience; and strengthening articulation with high schools.

A preliminary look at survey responses indicates that institutions with high graduation rates are introducing systemwide changes, such as:

- **Establishing pathways programs** that provide an integrated, institution-wide approach to student success via structured educational experiences that support each student from point of entry to attainment of high-quality postsecondary credentials and careers;

- **Revamping developmental education** to help students learn content that they never mastered in high school and to make it possible for them to earn course credits sooner to accelerate time to degree;
- **Revising “gatekeeper” courses**, which are the first or most basic college-level courses students take in a subject such as mathematics, reading, or writing, often following completion of one or more developmental courses in that subject;
- **Improving student advising**; and
- **Upgrading student services** to address common barriers to higher education and to foster academic success and college completion.

The analysis indicates that institutions with higher graduation rates appear to address problems more systemically (as an institution-wide concern) than lower graduation rate institutions, which trended toward smaller student-success initiatives. HLC plans to further analyze the data and is working with researchers from a broad range of institutions to explore which changes are having the most impact.

Institutions below the threshold were more likely to:

- Have a specific plan for improving completion and retention;
- Monitor the course completion rates of its students;
- Monitor the transfer-out rate of students;
- Set a target graduation rate;
- Monitor the graduation rate of students not included in the Student Right to Know graduation rate; and
- Monitor program-level completion rates.

The survey found that lower graduation rate institutions had a significantly higher transfer-out rate (25 percent) compared with high graduation rate institutions (18 percent).

Middle States Commission on Higher Education (MSCHE)

MSCHE accredits more than 500 higher education institutions in the mid-Atlantic Region (Delaware, District of Columbia, Maryland, New Jersey, New York, and Pennsylvania), as well as institutions in Puerto Rico and the Virgin Islands.

MSCHE reviewed the most recent IPEDS first-time, full-time graduation rate data and requested additional context from the 42 institutions whose graduation rates fell below the C-RAC threshold. Of these, 23 were community colleges and 19 were four-year institutions, some of which had multiple IPEDS numbers resulting in 30 separate data sets for the 19 institutions. These institutions were provided with IPEDS trends over the past five years and each was asked for information about the data on their institutions, the value and limitations of the federal data, what it was doing to improve graduation and retention, and how specific factors—such as institutional mission, student demographics, and student barriers to graduation—affected current graduation rates.

MSCHE paid close attention to the needs of students attending minority-serving and open-access institutions. These students are often less affluent and less prepared for college than those attending institutions whose IPEDS graduation rates are above the threshold. Many are first-generation college students who are juggling competing priorities related to their jobs, families, and academics.

MSCHE Observations

MSCHE noted that institutions are keenly aware of their graduation rates and that most are taking significant steps to improve them. Notably, institutions are making organizational, curricular, and infrastructure changes to better address the needs of their students. These changes include introducing:

- **Targeted pre-college orientation, and/or first-year experience programs;**
- **Institutional reorganization focused on student services and other departments;**
- **Course-of-study revisions, including curriculum mapping to provide students with a “critical path” to completion;**
- **More proactive advising practices; and**
- **Acceleration of time to degree via reduction of required credits and/or integration of developmental work into credit-bearing courses.**

Five-Year Data Trends

Application of the C-RAC threshold yielded 42 institutions for follow up. Realizing that a single data point provides, at best, limited information, MSCHE retrieved and provided to those institutions five years of data (2010-11 through 2014-15) for their review. Looking at trends from 23 community colleges and 19 four-year institutions helped to clarify whether institutions are improving or sustaining performance rather than having one “good year,” a distinction impossible to make using the annual Student Right to Know one-year snapshot graduation rate. MSCHE is conducting additional analyses and adding individual institutional context to each.

The initial review of the data in isolation did not seem to yield a consistent pattern, thus underlining the need to put data in context to obtain clear understanding of challenges, opportunities, and student success.

Like other regions, Middle States found significant limitations in federal graduation data, which included only a small percentage of the total student body and did not account for students who had transferred to other institutions.

Commission on Institutions of Higher Education of the New England Association of Schools and Colleges (NEASC)

NEASC accredits 234 colleges and universities in the six New England states (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont).

The Commission identified a total of 28 institutions—21 community colleges with graduation rates for first-time, full-time students ranging from eight to 15 percent; and seven baccalaureate institutions with rates ranging from two to 21 percent.

While 43 (of 88) community colleges in the region constitute about 17 percent of the region's education institutions, they represent three-quarters of those under the threshold.

All institutions under the threshold were asked to submit a seven-page report addressing four questions:

1. Is the Student Right to Know graduation rate for your institution accurate?
2. Are there other data about retention rates, graduation rates, and other measures of student success that you want to provide?

3. What efforts are underway now at your institution to support students to graduation and how effective are those efforts?
4. What additional efforts is your institution planning to undertake in the near future?

NEASC then convened a committee of peers, including two commissioners, to review the reports and make recommendations for further action to the full Commission.

NEASC Observations

The Commission is aware of and understands the concern about low graduation rates and found this initiative to be helpful. NEASC noted that, at most of the identified institutions, the federal graduation rates apply to only a small percentage of new students who enroll, because most entering students start as part-time students or enroll with prior credits.

Institutional reports provided a rich understanding of the Student Right to Know graduation rates. For example, one institution reported that nursing students and dual-enrollment (early college high school) students were not counted in the IPEDS cohort. That is because dual-enrollment students have already begun college in high school and are not counted as first-time students. Similarly, nursing students at one institution begin their studies in January, so are not counted in the fall-semester-based Student Right to Know graduation rates.

Many institutions noted that they found considerable value in participating in nationally organized initiatives to promote student success—including the National Student Clearinghouse, the

Achieving the Dream initiative, and more recently the Voluntary Framework for Accountability. Working with peers builds community and commitment to support student success.

In their reports, institutions noted that they often have reasonably sized IPEDS cohorts one semester but, by the next semester or so, a large percentage of students shift their enrollment status to part-time because of complications in their lives. Administrators—particularly at community colleges—say that today’s students face nonacademic challenges that make it difficult to finish a two-year degree in two or three years or a four-year degree in four, five, or six years. They work; they have children; they have family members who need care; they have health issues; they are concerned about being deported or about a family member being deported; they have financial issues; their mastery of the English language is not what it could be; their prior education did not prepare them well for the rigors of college-level work. The contingencies affect graduation rates, as part-time students often don’t take enough courses to graduate within three years.

Some four-year colleges in the northernmost New England states have experienced significant declines in full-time, 18- to 24-year-old students as part of regional demographic shifts. But these institutions and others across the region equate economic survival with maintaining, not cutting, spending on strategies that boost retention. They recognize the institutional investment in new students and help them through to graduation. Student retention is a top priority to raise graduation rates.

In recent years, institutions have introduced a broad array of initiatives to help students graduate. These programs support the transition to college; academic success; mental and physical health; economic well-being; transfer; and career preparation. Many are part of grant-funded reform networks (e.g., from the Lumina Foundation) focused on college completion and retention, advising and interactive learning, early alert referrals, and improved outcomes for adult learners.

Some of the larger institutions coordinating a range of initiatives are using other established indicators of student success (e.g., the Student Achievement Measure and/or National Student Clearinghouse data—see Appendix A) or have created their own measures. When outcomes such as transfer to another institution are included, the numbers' validity increases.

Community college officials also reported that some of their students in specific certification programs do not complete college because they get good job offers based on taking a few courses. For example, at one institution, those who graduate from its welding program are, in fact, not the best welders, who tend to be hired before they graduate. Community college presidents say that the situation exists at a number of certification programs: for emergency medical technicians (students leave to work as paramedics), medical assistants (students leave to work as phlebotomists), electricians (students leave to become subcontractors), and mental health specialists (students take jobs in clinics or hospitals).

Based on its review of the 28 institutions, NEASC placed each into one of four groups:

- Eleven institutions provided clear evidence that the college understands its students, uses

mission-appropriate measures of student success, and is implementing additional support initiatives. The recommendation for these institutions was to thank them for their report and to encourage them to keep up the good work.

- Seven institutions were already in the midst of developing progress reports or some other kind of follow-up about student success that NEASC previously requested.
- Seven institutions, the Commission found, had submitted reports that lacked important student data, along with specifics about efforts to improve graduation or retention; these institutions were asked to address these matters in an upcoming report.
- Three institutions were asked to file a special report. At one of these, NEASC conducted a site visit to better understand what was happening.

The New England regional accreditor then convened a committee of peers to review the reports and make recommendations for further action to the full Commission. The Commission has a broad range of actions it can take—from continuous monitoring to withdrawing accreditation—if institutions do not demonstrate that they are paying sufficient attention to graduation and retention. The committee determined that the institutions were aware of—and addressing—their specific concerns related to retention and graduation rates (but with varying levels of analysis and programmatic follow up). The Commission will continue to monitor their progress.

Northwest Commission on Colleges and Universities (NWCCU)

NWCCU accredits colleges and universities in seven states: Alaska, Idaho, Montana, Nevada, Oregon, Utah, Washington, and some institutions in British Columbia, Canada. These 162 member institutions include public, private, and tribal colleges and universities, serving about 1.3 million students.

NWCCU Observations

The Northwest Commission on Colleges and Universities (NWCCU) is starting a pilot project with the National Student Clearinghouse to gain more accurate information about graduation rates in the region and efforts to improve them. Based on a recently completed demonstration project that brought together four diverse institutions to examine the effectiveness of their general education programs, institutions have expressed strong interest in using an institutional cohort model to enable them to learn from one another's retention improvement initiatives. In addition, the Commission has added four questions about graduation rates to its comprehensive review process. The questions are the following:

1. What are the key challenges of the institution related to the institution's Student Right to Know graduation rate and other data provided?
2. What is the institution doing to improve graduation rates?
3. What initiatives appear to be effective in improving graduation rates?
4. What might accreditors do to assist institutions to improve graduation rates?

As part of the year-seven comprehensive evaluation, institutions are asked to identify initiatives that appear to be effective in improving graduation rates. Regional initiatives include the following promising practices:

- **Introducing new student orientation activities** to acclimate students to college;
- **Providing mandatory advising** from college entry through completion;
- **Establishing clearer paths to graduation**, including direct admission into programs of the student's choice;
- **Creating "learning communities,"** student social networks devoted to academics and specific themes;
- **Evaluating enrollment performance and productivity** in granting more degrees for more students at a reasonable cost;
- **Enhancing general education** (which typically is delivered in the first two years of a four-year program) and grounding it in student learning outcomes; and
- **Using a broad range of assessments** to ensure that students are more engaged, mastering content, and improving their writing.

Because graduation rates themselves are lagging indicators, institutions are monitoring course completion and year-to-year retention rates to assess the effectiveness of these initiatives.

The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

SACSCOC accredits about 800 higher education institutions in 11 states: Alabama, Florida, Georgia,

Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia.

To get a more accurate view of graduation rates, SACSCOC received permission from each of its member colleges to compare federal graduation rates with National Student Clearinghouse data. The research, which examined more than 550 institutions (70 percent of the association's membership), included a survey exploring what institutions are doing to improve retention and graduation rates.

SACSCOC Observations

SACSCOC collected 5,344 “mini-stories” of institutions' efforts to support and facilitate student completion, allowing it to document and categorize significant activities for improving graduation and retention. The SACSCOC Peer Review Advisory Board concluded that, broadly speaking, institutions were focused on bolstering advising; implementing early warning systems and predictive data analytics; upgrading orientation, course redesign, and bridge programs; and introducing residence life activities. On average, each institution reported about eight significant activities that they were working on, but overall, some 85 percent of the 800 institutions in the Southern region reported that they were addressing graduation rates in at least five different ways.

SACSCOC researchers have begun to catalogue what colleges are doing. A preliminary conclusion is that institutions are focused primarily on academic and student-support services, curriculum and pedagogy, and administrative support, and use a combination of interrelated implementation approaches to consider:

Policies and procedures to address key issues including:

- accelerating time to degree;
- expediting entry into college-level courses or improving student success in specified courses in particular subject areas;
- introducing stackable credentials in vocational/technical areas;
- developing policies to enable students to retake classes and have the last grade count toward their cumulative GPAs; and
- introducing Open Education Resources in place of textbooks to reduce cost and ensure that students have required learning materials when classes begin.

Programs, structures, and personnel to support student success:

- introducing mandatory advising, orientation, and summer bridge programs that improve college readiness and provide needed support networks for students;
- providing financial planning and financial literacy programs to put students on solid economic ground;
- designing special initiatives to improve the success and completion rates of African-American males;
- consolidating major student services within a one-stop service center structure;
- establishing academic success centers and/or math centers with full-time tutors;
- hiring coordinators for freshman seminar and study skills courses;
- expanding advising; and

- developing cross-campus committees to coordinate and track follow-up support and outreach efforts.

Use of software/technology, including installation of new software in areas such as:

- improving student planning, scheduling, and registration; and
- establishing early warning systems to “flag” students who appear to be falling behind in their academic work or exhibiting behaviors that may lead to failure.

Use of data and institutional research analytics, which virtually always involves software and focuses on analyzing data for a specific purpose, including:

- monitoring and tracking student satisfaction and needs to see what areas students rank as priorities and how well the institution has responded;
- expanding technology-based advising models to create early warning systems and intervening when students get behind in their academic work or exhibit behaviors that may lead to failure; and
- using predictive analytics as part of advising to help identify students who are off track or to track student decisions and alert advisors when a student goes off path.

Professional development, including:

- long-term faculty development to build communities of practice, bolster faculty leadership, and help share best practices to support first-generation students; and

- short-term faculty development to introduce college instructors to diagnostic testing and small-stake assignments to predict, assess, and address student success issues in gateway classes.

When SACSCOC compared the National Student Clearinghouse graduation rates with the federal Student Right to Know graduation rates, it found that NSC graduation rates were much higher than those of IPEDS—about twice the rate for community colleges and 12 percentage points higher for four-year institutions. That is because NSC includes students who graduate or enroll at other institutions in its overall completion rates and uses a different time frame to measure the completion statistics for two-year colleges. In addition to the traditional 150 percent or three-year time frame, NSC reports student status at the six-year point after the student’s initial enrollment. Further, NSC offers a more comprehensive and valid view of student matriculation because it is actually tracking the individual student (see Appendix A).

SACSCOC also investigated the portion of institutions that fell below the C-RAC threshold from the total number of accredited institutions state by state. In Florida (3.9 percent), Kentucky (4.1 percent), Mississippi (3.1 percent), and Virginia (zero percent), for example, a low percentage of accredited institutions fell below the graduation rate threshold. In Alabama (25 percent), Georgia (23.2 percent), Louisiana (15.4 percent), South Carolina (25.5 percent), and Texas (21.3 percent), a much higher percentage of accredited institutions fell below the threshold.

WASC Senior College and University Commission (WSCUC)

WSCUC accredits 191 institutions in California, Hawaii, and the Pacific Islands.

WSCUC looked closely at the five institutions in the region that fell below the graduation rate threshold and reviewed the “Absolute Graduation Rate” calculated through its Graduation Rate Dashboard (GRD), which includes all undergraduate students graduating from an institution regardless of enrollment status or time to degree.

WSCUC Observations

One of its institutions offers seven undergraduate and seven graduate degrees, but the majority of its students are in graduate programs. Two of the institutions primarily offer associate degrees, but are members of WSCUC because they offer two or more baccalaureate degrees, making them ineligible for ACCJC membership.

WSCUC’s analysis of 23 California State University institutions found that the federal Student Right to Know data dramatically underreported graduation rates by 3 to 32 percentage points, largely because the data did not include large groups of students enrolled.

Endnotes

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