QUALITY ASSURANCE AND IMPROVEMENT IN HIGHER EDUCATION: THE ROLE OF THE STATES

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EXECUTIVE SUMMARY

Higher education is facing a host of challenges, including external questions regarding its value and purpose. These questions cut to the core of the states’ role in higher education. Traditionally, states have the responsibility to ensure that institutions of higher education are operating in the public interest and that the institutions are good stewards of their public resources. Central to this responsibility is the question of institutional and educational quality. Concerns regarding higher education quality and the states’ role in quality assurance and improvement motivated the State Higher Education Executive Officers Association (SHEEO) and the National Association of System Heads (NASH) to partner with Lumina Foundation to investigate current state and system practices and to work toward recommendations for future action.

Using a variety of data sources, including two in-person convenings of relevant stakeholders, a survey of state higher education agencies and system offices, and qualitative interviews, the partners explored current quality assurance and improvement practices, challenges and limitations related to quality assurance and improvement at the state and system levels, and ideas for how current policies and practices might be improved.

The findings revealed that approaches are varied and limited by a lack of consensus around what quality means in higher education and what the appropriate level and manner of state and system engagement regarding quality should be, and limited resources (staff, money, and technology). Nevertheless, participants and respondents provided important insights into how states and systems might better engage in the question of quality and work to assure and improve quality in higher education. In that regard, we recommend the following:

Arrive at widely agreed upon understandings of quality. While state agencies and system offices will and ought to have their specific definitions of quality, developing shared understandings of quality would help individuals and entities advance our shared work in defining, assessing, and improving quality. A collaborative effort across states and with other stakeholders with interest in and responsibility for aspects of quality assurance will be needed to arrive at a shared understanding. We believe the benefits warrant the effort.

Develop a greater understanding among all relevant actors of the state’s interest and role in educational quality. There is still some lack of knowledge and appreciation of the state’s specific role in quality assurance and improvement. This lack of understanding exists among institutional and faculty leaders, accreditors, the federal government, and state and system policy leaders and practitioners. Additional thinking and work are needed to properly articulate and defend this state role and to explain why and how states ought to be involved in this work.

Identify best practices in quality assurance. Additional efforts are needed to identify what works in quality assurance and improvement and to diffuse those efforts across states and systems. This will require engagement from state and system leaders, college and university leaders, faculty, academic researchers, think tanks, policy organizations, and funders.

Make program review and state authorization meaningful quality assurance processes. Essential roles of state agencies and/or system offices—program review and state authorization—are often treated as bureaucratic processes and even rubber stamps. Making these processes substantive and focused on quality assurance is challenging but necessary. Ideas for improvement include requiring institutions to submit assessable learning outcomes, descriptions of how they...
will meet those outcomes in meaningful ways, plans for faculty development, engaging in follow-up reviews of authorized institutions and approved programs, and requiring evidence of the institutions’ or programs’ success in accomplishing the approved student learning outcomes. Continuing to assess the institution’s capacity and resources and other existing requirements will likewise be valuable. Further, state and system leaders, researchers, faculty, and other interested parties ought to consider what innovations in state authorization and program approval might help improve quality assessment and improvement efforts.

Treat equity as a quality consideration. Among participants and respondents, there appeared to be a coalescing around the need to close equity gaps and to treat equity considerations as quality considerations. However, better data, research, and political and institutional will are needed to properly address quality concerns from an equity perspective. Understanding gaps in student resources and opportunities and measuring the ability of institutions to improve higher education access and outcomes for underserved students will be critical in considering how to address equity gaps. Such examinations need to be done within and across institutions. A quality system of higher education needs to be quality for all students, not just well resourced, white, and high achieving students. In that regard, states have a particular responsibility for looking out for underserved students and ensuring they receive a quality education. Quality public institutions should, in the state’s eyes, deliberately promote economic mobility and opportunity and work to close achievement gaps. Again, collaborative efforts between state and system leaders, college and university leaders, academic researchers, faculty, think tanks, policy organizations, and funders will be needed.

Actively engage faculty and institutional leaders. Ultimately, a quality education is dependent on what happens within our colleges and universities and in particular what happens in our classrooms. Actively seeking the participation of institutional leaders and faculty will be critical to the success of any quality assurance and improvement efforts. State agencies and systems ought to develop mechanisms for the inclusion of faculty and institutional leaders in the state- and system-level quality assurance and improvement efforts such as working groups and advisory boards. They ought to also develop relationships with individual faculty members and institutional leaders that allow for state and system leaders to seek ad hoc information, reactions, and advice. State agencies and system offices also ought to explore ways they might support faculty in their critical role.

Invest in data, tools, and people. State lawmakers will need to provide state higher education agencies and system offices with the financial resources to collect the appropriate data, implement the appropriate assessments, conduct the appropriate analyses, properly interpret the information, and design and implement the appropriate policies and practices. This will require hiring qualified staff and investing in the necessary infrastructure and tools.

Open lines of communication and real partnership between members of the triad. As described and authorized in the federal Higher Education Act, the U.S. Department of Education, approved accreditors, and state governments make up the program integrity triad. These three entities are supposed to work together to ensure the quality of providers of postsecondary credentials. However, the triad has not always functioned appropriately or lived up to its obligations. Opening lines of communication, developing agreed upon protocols for information and data collection and sharing, developing shared understandings and agreements regarding roles and responsibilities, and engaging in more collaborative work and peer learning would all help the triad function more effectively.
QUALITY ASSURANCE AND IMPROVEMENT IN HIGHER EDUCATION

THE ROLE OF THE STATES

Higher education is facing a host of internal and external challenges, including constrained resources resulting from reductions in state support, competition from nontraditional providers of training and credentials, and in many states, a declining number of high school graduates. Further, since the beginning of 2016, at least 104 colleges and universities have closed, not counting acquisitions, consolidations, and mergers. Several of these have been large national for-profit chains affecting thousands of students in states across the country.

As a result of these challenges, there is a growing suspicion of and lack of confidence in higher education generally. Questions regarding the quality of the educational experience provided to students and the value of their credentials abound. Less than half (48 percent) of Americans express “a great deal” or “quite a lot” of confidence in higher education. This represents a 9 percentage point decline from 2015, and among Republicans, confidence has declined by 17 percentage points. Central to these challenges and a primary concern is the question of quality and what students get for the money and time they commit to higher education. Likewise, growing evidence indicates that resources, opportunities, and educational experiences are not equally distributed, with low-income, students of color, and rural students segregated into lower resourced institutions, for-profit institutions, and institutions with lower educational outcomes.  

States play a fundamental role in higher education, protecting both the investment of state dollars and their citizens as their consumers. Despite their central responsibility in this regard, states have struggled with how they might help ensure that students are receiving a quality educational experience. Definitions of quality in higher education are varied and contested, while measuring quality may be an even more difficult task. Even where definitions and measures exist, it can be challenging to know how states might use them in actual quality improvement efforts. To help address these challenges, the State Higher Education Executive Officers Association


(SHEEO), the National Association of System Heads (NASH), and Lumina Foundation partnered to conduct an environmental scan of the existing landscape of approaches utilized to assess and assure the quality of higher education institutions and credentials at the state and system levels. This white paper reports on the findings of this project.

**PROJECT AND REPORT OVERVIEW**

With funding from Lumina Foundation, SHEEO and NASH conducted an environmental scan of the existing landscape of approaches utilized to assess and assure the quality of higher education institutions and higher education credentials at the state and system levels. The project was divided into four phases:

**Phase 1:** The partners convened with a group that included but extended beyond the traditional program integrity triad, made up of states, the federal government, and accreditors. This convening included state higher education executive officers (SHEEOs), university system leaders, regional and national accreditors, a representative from the U.S. Department of Education, and other interested parties to discuss quality assurance and improvement and ideas for strengthening the triad.

**Phase 2:** The partners contracted with the Indiana University Center for Postsecondary Research (IUCPR) to help design, administer, and analyze the data from a survey designed to learn about SHEEO and NASH members’ definitions, activities, and experiences with regard to quality assurance and improvement in their states, including current practices.

**Phase 3:** The partners conducted interviews with state higher education agency and university system leaders to probe more in-depth into their quality assurance and improvement efforts, including definitions, capacities, and engagements. The partners then contracted with Research for Action (RFA) to code and analyze the qualitative data.

**Phase 4:** The partners reconvened with representatives from state higher education agencies and system offices, institutional leaders, academic researchers, policy organization staff, accreditors, think tanks, and others to review the findings from the first three phases of the project and share promising quality assurance practices. This group also considered changes to current practices and divisions of responsibility regarding quality assurance.

Using the data from the four research phases of this project and the reports authored by IUCPR and RFA, this report summarizes the findings of the project. The findings are often disaggregated using the broad categories of state agency and system office. For this report, the state category refers to those respondents from state-level bodies (e.g., coordinating and planning boards) that did not classify themselves as belonging to a system office. System offices often have direct operating, administrative, and financial control over the institutions they oversee. Likewise, they generally oversee a specific sector of institutions (public universities or community colleges). State agencies generally have less operational control and instead must often rely on state policy changes and/or persuasion to see changes in institutional actions.

The findings are divided into six critical topics that rose to prominence across our data sources. These include (1) definitions and assessment of quality, (2) quality improvement efforts, (3) equity and quality, (4) the program integrity triad, (5) challenges and limitations in states’ quality efforts, and (6) future directions and recommendations for state higher education agencies and system offices. We hope the findings from this project will inform the field and generate momentum to improve quality assurance efforts at the state and system levels.
DEFINING AND ASSESSING QUALITY

As seen in Table 1, the majority of state agency[2] and system office respondents place quality assurance as an essential priority within the mission of the organization. However, both the survey data and the interview data revealed modest consensus, at best, in how these entities define quality in higher education. Several survey and interview respondents reported that their offices had no operating definition of quality. As articulated in RFA’s report from the interview data, the definitions that were provided can be placed into two broad categories: (1) the abstract and conceptual and (2) the operationalized. The abstract and conceptual definitions generally related to ideas of personal growth and students accomplishing their full potential. The operationalized definitions were more tied to specific measures, such as employment outcomes, graduation rates, equitable graduation rates across student groups, licensure, and certification exam scores. In both sets of data, several agencies and offices deferred to accreditation both as a definition and a measure of quality. Others had no conceptual or operationalized definition of quality.

| TABLE 1: WHERE QUALITY ASSURANCE FITS IN THE OVERALL MISSION OF THE ORGANIZATION |
|---------------------------------|-----------------|-----------------|------------------|
|                                 | **State Agency** | **University Office** | **Total** |
| A top priority (central to our mission) | 14.30% | 12.50% | 13.60% |
| A priority, but co-equal with other important functions and concerns | 57.10% | 50.00% | 54.50% |
| Important, but other concerns have higher priority | 28.60% | 37.50% | 31.80% |
| Not important or outside our purview | 0% | 0% | 0% |

Notes: Respondents were instructed: “Please indicate where quality assurance fits in the overall mission of your organization.”

In the survey, respondents were asked to identify from a list of education outputs, priorities, and impacts the factors they considered to be important in defining quality at the state or system level (see Figure 1). They were then asked to identify the top three among their selections (see Figure 2). Across both questions, while occurring in different orders depending on the question, top factors were: reducing attainment gaps, undergraduate degree production, talent development, and student learning outcomes. Differences are apparent between states and systems in their ranking of the importance of talent development and retention in-state, with states giving far greater importance to that factor than systems (Figures 1 and 2). Likewise, as seen in Figure 2, the state ranked student learning outcomes higher than did systems.

2. In the survey results, “state” refers to those respondents from state-level governing, coordinating, and planning bodies that did not classify themselves as belonging to a system office.
FIGURE 1: FACTORS IN DETERMINING HIGHER EDUCATION QUALITY DEFINITIONS: PROBABILITY OF MENTION BY TYPE OF ORGANIZATION

- Reducing attainment gaps
- Undergraduate degree production
- Talent development and retention in-state
- Economic mobility for low-income students
- Graduate degree production
- Student learning outcomes
- State economic development
- State workforce development
- Research productivity
- Civic participation (voting, voluntarism, etc.)
- Certificate production (from traditional providers)
- Alternative credential production

FIGURE 2: TOP THREE FACTORS IN DETERMINING HIGHER EDUCATION QUALITY: PROBABILITY OF MENTION BY TYPE OF ORGANIZATION

- Undergraduate degree production
- Talent development and retention in-state
- Student learning outcomes
- Reducing attainment gaps
- State workforce development
- Economic mobility for low-income students
- State economic development
- Graduate degree production
- Research productivity
Probing more deeply into these questions and concepts in the interviews revealed a distinction between what might be called academic quality and institutional quality. Academic quality was generally understood as academic and learning outcomes that respondents defined as the core of quality higher education. While inclusive of academic quality, institutional quality was understood as broader and included sector-specific and institution-level factors and concepts. In their report, based on the qualitative data, RFA broke down the concepts and their associated outcomes in this way:

- **Academic quality:**
  - Quality instruction;
  - Student learning;
  - Employability or workforce currency;
  - Licensure attainment;
  - Alumni satisfaction;
  - Accomplishment of student goals (such as transfer or personal growth); and
  - Faculty quality, faculty/student ratio, and faculty diversity.

- **Institutional quality:**
  - Institutional performance, including:
    - Rates of student enrollment, retention, and outcomes;
    - Presidential/leadership quality;
    - Technology and facilities;
    - The financial health or sustainability of the institution; and
  - Affordability or manageable debt-to-income ratio for students.
  - Sector-specific indicators of quality, including:
    - Research production for research universities; and
    - Alignment to local workforce demands, comprehensive universities, and community colleges.
  - Quality contributions to the state or community, including:
    - Equitable student access and outcomes for underserved student populations;
    - Economic mobility for students;
    - Civic engagement of alumni;
    - Economic contributions to the state or community; and
    - Commitment to community well-being.
MEASURES OF QUALITY

Regarding specific quality measures employed by state agencies and system offices, the traditional measures of graduation and retention rates were among the most likely to be employed (see Figure 3). Transfers were also near the top of the list for system offices as were enrollments by sector. Licensure exam performance was frequently mentioned by state agencies.

**FIGURE 3:** MEASURES USED TO ASSESS THE QUALITY OF HIGHER EDUCATION: PROBABILITY OF MENTION BY TYPE OF ORGANIZATION

<table>
<thead>
<tr>
<th>Measure</th>
<th>Probability of Mention by Type of Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graduate rates by level of institution</td>
<td>80%</td>
</tr>
<tr>
<td>Retention rates by level of institution</td>
<td>70%</td>
</tr>
<tr>
<td>Degree production in specific fields</td>
<td>60%</td>
</tr>
<tr>
<td>Licensure exam performance</td>
<td>50%</td>
</tr>
<tr>
<td>Degree production by level of institution</td>
<td>40%</td>
</tr>
<tr>
<td>Student debt upon graduation</td>
<td>30%</td>
</tr>
<tr>
<td>Graduate employment</td>
<td>20%</td>
</tr>
<tr>
<td>Certificate production in specific fields</td>
<td>10%</td>
</tr>
<tr>
<td>Undergraduate enrollment by race/ethnicity &amp; level of institution</td>
<td>100%</td>
</tr>
<tr>
<td>Transfers from community colleges to public 4-year institutions</td>
<td>90%</td>
</tr>
<tr>
<td>Enrollment rates among recent high school graduates</td>
<td>80%</td>
</tr>
<tr>
<td>Undergraduate enrollment by level of institution (2- or 4-year)</td>
<td>70%</td>
</tr>
<tr>
<td>Standardized test scores (e.g., GRE, CLA, ACT)</td>
<td>60%</td>
</tr>
<tr>
<td>Certificate production by level of institution</td>
<td>50%</td>
</tr>
<tr>
<td>Graduate earnings</td>
<td>40%</td>
</tr>
<tr>
<td>Undergraduate enrollment of nontraditional age students</td>
<td>30%</td>
</tr>
<tr>
<td>Student satisfaction surveys (e.g., NoelLevitz)</td>
<td>20%</td>
</tr>
<tr>
<td>Percentage of graduates pursuing further education</td>
<td>10%</td>
</tr>
<tr>
<td>Student engagement surveys (e.g., NSSE, CCSSE)</td>
<td>90%</td>
</tr>
<tr>
<td>Progression or credit milestone rates</td>
<td>80%</td>
</tr>
<tr>
<td>Results from statewide rubric-based learning outcomes</td>
<td>70%</td>
</tr>
<tr>
<td>Enrollment rates by subpopulations</td>
<td>60%</td>
</tr>
<tr>
<td>Proportion of programs available in alternative formats</td>
<td>50%</td>
</tr>
<tr>
<td>Alternative credentials production in specific fields</td>
<td>40%</td>
</tr>
</tbody>
</table>
Interviewees also suggested that accreditation served as a measure of quality. Several state agency interviewees reported that they defaulted to accreditors when it came to quality assessment, feeling that the state ought not to involve itself directly in matters of academic quality. For others, accreditation served as a minimum threshold for quality, and they believed states and institutions have a responsibility to assure quality above and beyond accreditation. Similarly, several interviewees deferred to institutions and specifically to the faculty when it came to defining and assuring academic quality. As one chief academic officer explained: “I will let faculty do what faculty do. I’m not trying to do their job. My job is to be of service to them.” And a SHEEO stated, “That’s [faculty members’] job, and we think you’re [the faculty] really good at it. We also believe that accreditors kind of help to keep [faculty] on the right path, and accreditation is a way of checking in.”

Additional measures for academic quality mentioned in the interviews included: accreditation outcomes and measures, program review, alumni satisfaction, and institutional learning assessments. For institution quality, interviewees also mentioned: the financial health of the institution, externally funded research dollars, and economic and social impact.

In the interviews, respondents also indicated a need to address institutional quality from a sector-specific perspective. In that regard, respondents indicated that quality assessments ought to relate to an institution’s mission and sector-specific characteristics. For research universities, research production and funding may be important measures. Likewise, respondents expressed concern about the quality of for-profit institutions and some of their national accreditors.

DATA SOURCES FOR MEASURING QUALITY

Specific data sources used by state agencies and system offices varied. Traditional sources, like the Integrated Postsecondary Education Data System (IPEDS) administered by the U.S. Department of Education and the National Student Clearinghouse, were the most popular. Surprisingly, IPEDS data appeared to be the most popular among the options included in the survey, although local in-house data sources were not provided as a choice. IPEDS only includes aggregate institution-level data, which tend to be over a year old and are publicly available. Likewise, IPEDS does not include any learning outcomes data. Nevertheless, IPEDS is one of the only sources for comparable institution-level data across sectors and states. State agencies are far more likely to use state student-level data and are likewise more likely to make use of state unemployment data, which provide data on employment outcomes (e.g., salary and employment area).
Other data sources mentioned in the interviews included: licensure exams, loan default rates, institution economic impact reports, Bureau of Labor Statistics, accreditation and program review reports, Gallup Alumni Survey, Equifax graduate outcomes metrics, and institutions’ audited financial statements.

**QUALITY IMPROVEMENT EFFORTS**

Among respondents, state agencies appeared to have greater satisfaction with the states’ overall quality assurance efforts when compared to system office respondents (see Table 2). The majority of state agency (64 percent) and system office (56 percent) respondents were somewhat satisfied with the approach they are taking to assure the quality of higher education. However, a larger share of state agency respondents were very satisfied (29 percent) when compared with system office respondents (11 percent). Likewise, a larger share of system respondents (33 percent) were somewhat dissatisfied compared to state office respondents (7 percent). Because respondents were asked to assess their level of satisfaction with their state’s approach to quality assurance, system respondents may have been assessing the state’s effort writ large (beyond their system office) or those efforts of a specific state higher education agency (again external to their system) and not the system’s efforts themselves.
TABLE 2:
SATISFACTION WITH THE APPROACHES THE STATES ARE TAKING TO ASSURE THE QUALITY OF HIGHER EDUCATION

<table>
<thead>
<tr>
<th></th>
<th>State Agency</th>
<th>System Office</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very satisfied</td>
<td>28.60%</td>
<td>11.10%</td>
<td>21.70%</td>
</tr>
<tr>
<td>Somewhat satisfied</td>
<td>64.30%</td>
<td>55.60%</td>
<td>60.90%</td>
</tr>
<tr>
<td>Somewhat dissatisfied</td>
<td>7.10%</td>
<td>33.30%</td>
<td>17.40%</td>
</tr>
<tr>
<td>Very dissatisfied</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Notes: Respondents were asked: “How satisfied are you with the approach your state is taking to assure the quality of higher education?”

Interview participants described access to sophisticated statewide student-level data that link K-12, higher education, and workforce outcomes as critical tools in their quality assurance efforts. These participants reported using data to “increase the accessibility and transparency of the information that’s available to students and employers” and to “catalyze improvements and hold institutions accountable for quality outcomes.”

As seen in Figure 5, the most frequent uses of quality metrics (the metrics asked about in the survey) are in communication with institutional leadership, in accountability systems, and with accreditation-related work. Use in program approval is also common in both state agency and system offices. State agency respondents were more likely to report frequently using quality metrics in their communication with elected officials.
Interviewees also reported that they use their quality assurance data and measures to inform their strategic planning, to drive their quality improvement funding, and to inform the development of equity focused policies.

The need to collect and address student learning outcomes was a topic of great interest and discussion at both convenings. While good examples of utilization of these tools at the state or system level were not provided, they are seen as potential resources and areas of development for improving quality in academic programs.
PROGRAM REVIEW AND APPROVAL

Program approval was a topic that came up frequently in the qualitative interviews and during the final convening. As reported in Figure 5 above, close to 80 percent of survey respondents reported using quality assurance metrics in program approval. However, program approval is often viewed as a bureaucratic compliance exercise with little connection to other quality assurance efforts. Nevertheless, participants felt that it might function as an important quality assurance mechanism if approached in the right way. Program approval is often used as a way of avoiding unnecessary program duplication and for ensuring that there is demand and need for a new program. Participants also argued that the program approval process might require institutions to submit assessable learning outcomes and descriptions of how the proposed program will meet those outcomes in meaningful ways. Likewise, participants argued that during follow-up reviews of approved programs, states and systems might require institutions to provide evidence of the programs’ success in accomplishing the approved student learning outcomes.

EQUITY AND QUALITY

Across the data sources, there appeared to be a growing recognition that equity concerns, including achievement gaps, are quality concerns. In fact, in the final convening, there was widespread agreement that a program could not be considered a quality program if significant achievement gaps existed. As one participant explained:

Quality assurance and the furtherance of equity are interdependent. Authentic quality assurance must promote equity. Authentic efforts to advance equity must incorporate attention to quality assurance. And we must aggressively dispel the canard that expansion of access is synonymous with lower quality. To the contrary, claims for “academic quality” must be regarded as inconsistent with significant equity gaps.

And another noted their desire to “Work more intentionally and emphatically to help people in my state understand that equity and quality are constituent components of one another—these two things are not separate endeavors.”

The vast majority of survey respondents reported disaggregating their quality metrics by student populations (e.g., racial/ethnic groups, low-income students, first-generation students, nontraditional students) across and within institutions (see Table 2). However, state agencies were more likely to only disaggregate some of the metrics. This was particularly true for within institution metrics where nearly 31 percent of state agencies reported only disaggregating some of the metrics, while all system offices reported either disaggregating all or most of their data by student population within institution quality metrics.
### TABLE 3:
**PERCENTAGE OF QUALITY ASSURANCE METRICS DISAGGREGATED BY STUDENT POPULATION (E.G., RACIAL/ETHNIC GROUPS, LOW-INCOME STUDENTS, FIRST-GENERATION STUDENTS, NONTRADITIONAL STUDENTS) ACROSS AND WITHIN INSTITUTIONS**

<table>
<thead>
<tr>
<th></th>
<th>Across Institutions</th>
<th>State Agency</th>
<th>System Office</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>All</td>
<td>53.80%</td>
<td>50.00%</td>
<td>52.40%</td>
<td></td>
</tr>
<tr>
<td>Most</td>
<td>23.10%</td>
<td>37.50%</td>
<td>28.60%</td>
<td></td>
</tr>
<tr>
<td>Some</td>
<td>23.10%</td>
<td>12.50%</td>
<td>19.00%</td>
<td></td>
</tr>
<tr>
<td>None</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Within Institutions</th>
<th>State Agency</th>
<th>System Office</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>All</td>
<td>53.80%</td>
<td>62.50%</td>
<td>57.10%</td>
<td></td>
</tr>
<tr>
<td>Most</td>
<td>15.40%</td>
<td>37.50%</td>
<td>23.80%</td>
<td></td>
</tr>
<tr>
<td>Some</td>
<td>30.80%</td>
<td>0%</td>
<td>19.00%</td>
<td></td>
</tr>
<tr>
<td>None</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td></td>
</tr>
</tbody>
</table>

In the interviews, respondents reported a desire to identify and track achievement gaps down to the program level. As reported in the RFA report, one system leader explained, “We are just now getting into which programs underrepresented students either get into, or never get into, and whether or not they’re successful.” That system leader went on to explain that even if an institutional achievement gap appears to close, “If there’s never been an African American male ever graduating from a particular program, we still have a problem.”

### THE TRIAD

During the phase-one meeting of members of the program integrity triad (states, accreditors, and the federal government), there was widespread agreement that to improve the quality assurance function of the triad, members will need to engage in better information sharing and communication. Participants pointed to examples of institutions nearing failure or closing without all members of the triad knowing of the institutions’ dire circumstances. Participants appeared to agree that before one member of the triad takes significant action (accreditation visit, placing an institution on accreditation probation, placing an institution on heightened cash monitoring, etc.), that member ought to contact the other members of the triad. This would provide forewarning and the opportunity to gather additional information and perspective. The need for states to do a better job monitoring the financial viability of the institutions within their states and to better assess the quality of their institutions and academic programs was also discussed. Likewise, there was agreement that greater clarification is needed regarding the distribution of responsibilities before and after an institutional closure. Finally, there was agreement that an official annual meeting of the members of the triad would be helpful.
CHALLENGES AND LIMITATIONS

Across the data collection efforts, several challenges were repeatedly mentioned. Among those included were:

**Emerging credentials.** Respondents and participants indicated that new credentials pose a significant challenge to quality assurance efforts. State agencies reported that they often do not engage in program approval for short-term certificates at their public colleges and universities. This may be because they want to give institutions flexibility to be responsive to the marketplace, they want to minimize the administrative burden on institutions, or because courses that comprise these certificates are also included in approved programs. Also, it was reported that they currently make little or no effort to collect information about other credentials like badges, micro-credentials, nontraditional certificates, credentials offered by unaccredited and unauthorized providers, and the like. Additionally, work-based training and credentialing were also highlighted as areas where state higher education agencies and system offices often have little awareness. Because of their limited authority, responsibility, understanding, and awareness of these types of credentials, participants and respondents agreed that this is an area of significant quality concern.

**Nontraditional providers.** Similarly, participants and respondents highlighted nontraditional providers of credentials as an area of growing concern. These providers tend to be for-profit entities and often do not seek to be eligible for federal student financial aid and, as a result, do not seek accreditation. Some even try to avoid going through state authorization. Nevertheless, they charge tuition and fees, promising students a return on their investment. State agencies were particularly concerned about the quality of these providers.

**Defining quality.** Many participants and respondents struggled with the idea of academic or institutional quality at the conceptual level. For many, understanding what it is and/or what it should be is still a challenge. For others, moving from an idea of quality to a definition of quality was challenging.

**Data, assessments, and measures.** The question of how state agencies and system offices can accurately assess quality came up repeatedly. Salient issues included: what data ought to be collected and how, what assessment tools might provide indications of quality, and what measures might be created from the data. The lack of widely accepted standardized assessments that can accurately and broadly measure student learning serves as a particular challenge to state and system efforts. This was particularly a concern when it came to assessing learning outcomes.

**Balancing state oversight and academic freedom.** A number of respondents and participants indicated that quality is squarely the responsibility of the faculty. Balancing state oversight and academic freedom was a central concern even for those state agencies and system offices who reported playing an active role in quality assurance and improvement. Faculty play the central role in quality, and so questions regarding how states and systems might support faculty and how they might include faculty in the state- and system-level quality assurance and improvement efforts are critical.

**Resources and staff.** Adequate resources and staff knowledge and skills were frequently cited as challenges in state agencies’ and system offices’ efforts to assess and improve quality in higher education. Participants and respondents indicated that their offices lacked the financial resources necessary to engage in widespread assessments and/or the technological resources to properly use the data and assessments. Further, many indicated that they did not have the staff with the appropriate knowledge or skills necessary to engage in the type of quality assessment and improvement activities they would like to engage in.
RECOMMENDATIONS AND FUTURE DIRECTIONS

Based on the data collected through this project, we make the following recommendations:

Arrive at widely agreed upon understandings of quality. While state agencies and system offices will and ought to have their specific definitions of quality, developing shared understandings of quality would help individuals and entities advance our shared work in defining, assessing, and improving quality. A collaborative effort across states and with other stakeholders with interest in and responsibility for aspects of quality assurance will be needed to arrive at a shared understanding. We believe the benefits warrant the effort.

Develop a greater understanding among all relevant actors of the state’s interest and role in educational quality. There is still some lack of knowledge and appreciation of the state’s specific role in quality assurance and improvement. This lack of understanding exists among institutional leaders, faculty accreditors, the federal government, and state and system leaders. Additional thinking and work are needed to properly articulate and defend this state role and to explain why and how states ought to be involved in this work.

Identify best practices in quality assurance. Additional efforts are needed to identify what works in quality assurance and improvement and to diffuse those efforts across states and systems. This will require engagement from state and system leaders, college and university leaders, faculty, academic researchers, think tanks, policy organizations, and funders.

Make program review and state authorization meaningful quality assurance processes. Essential roles of state agencies and/or system offices—program review and state authorization—are often treated as bureaucratic processes and even rubber stamps. Making these processes substantive and focused on quality assurance is challenging but necessary. Ideas for improvement include: requiring institutions to submit assessable learning outcomes, descriptions of how they will meet those outcomes in meaningful ways, plans for faculty development, engaging in follow-up reviews of authorized institutions and approved programs, and requiring evidence of the institutions’ or programs’ success in accomplishing the approved student learning outcomes. Continuing to assess the institution’s capacity and resources and other existing requirements will likewise be valuable. Further, state and system leaders, researchers, faculty, and other interested parties ought to consider what innovations in state authorization and program approval might help improve quality assessment and improvement efforts.

Treat equity as a quality consideration. Among participants and respondents, there appeared to be a coalescing around the need to close equity gaps and to treat equity considerations as quality considerations. However, better data, research, and political and institutional will are needed to properly address quality concerns from an equity perspective. Understanding gaps in student resources and opportunities and measuring the ability of institutions to improve higher education access and outcomes for underserved students will be critical in considering how to address equity gaps. Such examinations need to be done within and across institutions. A quality system of higher education needs to be quality for all students, not just well resourced, white, and high achieving students. In that regard, states have a particular responsibility for looking out for underserved students and ensuring they receive a quality education. Quality public institutions should, in the state’s eyes, deliberately promote economic mobility and opportunity and work to close achievement gaps. Again, collaborative efforts between state and system leaders, college and university leaders, academic researchers, faculty, think tanks, policy organizations, and funders will be needed.
Actively engage faculty and institutional leaders. Ultimately, a quality education is dependent on what happens within our colleges and universities and in particular what happens in our classrooms. Actively seeking the participation of institutional leaders and faculty will be critical to the success of any quality assurance and improvement effort. State agencies and systems ought to develop mechanisms for the inclusion of faculty and institutional leaders in the state- and system-level quality assurance and improvement efforts, such as working groups and advisory boards. They ought to also develop relationships with individual faculty members and institutional leaders that allow for state and system leaders to seek ad hoc information, reactions, and advice. State agencies and system offices also ought to explore ways they might support faculty in their critical role.

Invest in data, tools, and people. State lawmakers will need to provide state higher education agencies and system offices with the financial resources to collect the appropriate data, implement the appropriate assessments, conduct the appropriate analysis, properly interpret the information, and design and implement the appropriate policies and practices. This will require hiring qualified staff and investing in the necessary infrastructure and tools.

Open lines of communication and real partnership between members of the triad. As described and authorized in the federal Higher Education Act, the U.S. Department of Education, approved accreditors, and state governments make up the program integrity triad. These three entities are supposed to work together to ensure the quality of providers of postsecondary credentials. However, the triad has not always functioned appropriately or lived up to its obligations. Opening lines of communication, developing agreed upon protocols for information and data collection and sharing, developing shared understandings and agreements regarding roles and responsibilities, and engaging in more collaborative work and peer learning would all help the triad function more effectively.

CONCLUSION

We hope the findings from this project will inform the field and generate momentum to improve quality assurance efforts at the state and system levels. Much of the real work remains. More research, innovation, and thinking are required. Efforts from all responsible and interested parties will be required to address the very real challenges facing higher education today and to ensure that students receive the quality education they deserve.
SURVEY AND QUALITATIVE METHODS AND MEETING DESCRIPTIONS

SURVEY METHODS
The survey was of state higher education agencies and system offices. Survey results included single responses from individual agencies and offices. SHEEO selected the Indiana University Center for Postsecondary Research (IUCPR) as the technical contractor to design and implement the survey. The survey project was approved by Indiana University’s Institutional Review Board (IRB). Following a survey-design meeting held at the SHEEO offices, IUCPR developed a draft survey that was circulated among SHEEO, NASH, and Lumina staff involved in the project. Based on feedback from this group, IUCPR programmed a pilot survey in Qualtrics that was then administered online to a small group of volunteers identified by SHEEO. Feedback from pilot participants informed the development of the final survey. Eighty-three agencies and offices were invited to participate in the survey, of whom 38 (45.8 percent) agreed to participate. (Two declined to participate and received no further reminders.) Of those 38, 22 (26.5 percent of the invited group) reached the end of the survey and answered most or all questions. The survey asked state agencies and system offices about their organizations’ definitions, activities, and experiences concerning quality assurance and improvement in their states, including current practices in data gathering and use to catalyze improvements and promote quality outcomes.

QUALITATIVE METHODS
SHEEO and NASH conducted nine interviews informed by conversations at the convening in Phase 1 and survey results from Phase 2. They conducted these semi-structured telephone interviews with 13 SHEEOs, system heads, chief academic officers (CAOs), or agency staff from eight states. Interview participants represented five state higher education agencies and four university systems. Positions included:

- Three SHEEOs;
- Three state higher education agency chief academic officers;
- Two state higher education agency staff members;
- One system head;
- Two system chief academic officers;
- One system executive vice chancellor; and
- One system vice provost for planning and effectiveness.

Interviews were coded and analyzed using an inductive analysis process reflecting rigorous qualitative research methods. The code list was derived from major themes identified in Phases 1 and 2 and was tested and refined on a subset of interviews and reviewed by staff at SHEEO, NASH, and Lumina. Findings were triangulated with survey findings.
MEETING DESCRIPTIONS

At the first meeting, the partners convened with a group that included but extended beyond the traditional program integrity triad made up of states, the federal government, and accreditors. This convening included state higher education executive officers, university system leaders, regional and national accreditors, a representative from the U.S. Department of Education, and other interested parties to discuss quality assurance and improvement and ideas for strengthening the triad. The goals of the meeting included:

- Improving communication among members of the triad;
- Exploring ways the triad might be strengthened and better assure and improve quality in higher education;
- Exchanging information on the ramifications of recent institutional closures, and exploring good practices to help disenfranchised students continue and complete their educational programs elsewhere;
- Exchanging information on the characteristics of other institutions at risk of closure and whether the triad, working more closely together, could better prepare for or prevent institutional closures; and
- Understanding what information and data are collected by each member of the triad and exploring how this information might be shared for the benefit of institutions and students.

At the second meeting, the partners reconvened with representatives from state higher education agencies and system offices, institutional leaders, academic researchers, policy organization staff, accreditors, think tanks, and others to review the findings from the first three phases of the project, and share promising quality assurance practices. This group also considered changes to current practices and divisions of responsibility regarding quality assurance. There were 48 participants. The objectives of the convening were to:

- Share promising quality assurance practices from various state agencies and system offices;
- Articulate areas of needed reforms in state-level approaches to quality assurance;
- Explore the potential for using existing and emerging sources of data in quality assurance efforts and implementing new policies at the state level; and
- Consider shifts in divisions of responsibilities and new partnerships across different actors responsible for improving and assuring quality.