



An Inventory of Best Practices: **The Disclosure of Student Achievement Information**

ACICS has developed this guide as a point of reference for private, independent colleges and schools as they establish and enhance their disclosures of institutional effectiveness, including indicators of student achievement, to prospective and currently enrolled students, parents, and other stakeholders: in other words, all parties with a policy or funding interest in enrollment decisions. Student achievement data represent some of the most important indicators of a post-secondary education institution's quality and integrity. As such, the information is most useful when it is easy for the consumer to find, using clear, unambiguous language.

Some of these characteristics are sometimes inconspicuous at institutional websites and other public-facing sources of information. Lack of easily accessible and clear student disclosure information may lead to confusion and misinterpretations, resulting in student complaints, adverse information, legal disputes and challenges by governmental authorities.

ACICS has conducted an empirical review of how institutions currently disclose student achievement information on websites to determine best practices and identify areas worthy of improvement. ACICS examined the content of the disclosures, the navigational steps required to access the disclosures, and their appearance, quality and credibility. The guidance herein is based on that recent, objective survey.

Reviewing and Reporting Effectiveness Information

In an effort to strengthen its procedures and to ensure that member institutions meet expectations regarding honesty and integrity, the Council has authorized the regular review of member institutions' public disclosures of student achievement data, both during and outside of the renewal of accreditation cycle. Systematically and on a recurring basis, ACICS will review the accuracy, clarity and accountability of institutional disclosures on student achievement by performing random reviews of member institutions' internet homepages and disclosure pages, publications and advertisements. The data will be collected, analyzed, and presented for review by the Council.

The student achievement disclosure outreach initiative reinforces ACICS' on-going recognition by the U.S. Department of Education (ED.Gov) and the Council for Higher Education Accreditation (CHEA) regarding the effective and continuous quality review of institutions during and in between the normal accreditation review cycle (ED.Gov; Title 34 of CFR §602.17 (f)(1)(2) and §602.19; and CHEA Recognition Policy and Procedures 12.A.3, 12.A.5, 12.B.1, 12.B.7, and 12.E.1). The review by ACICS also complies with CHEA's expectations that require institutions to demonstrate accountability and transparency (12.B.1).

Summary of Federal Requirements

Federal requirements relating to student achievement disclosures are derived from several legislative acts and regulations:

The Student-Right-to-Know Act (P.L. 101-542), enacted in 1990, requires institutions participating in Title IV programs to calculate completion or graduation rates of certificate or degree-seeking full time students and to disclose this information to all students and prospective students (Title 1, Section 103).

The Higher Education Opportunity Act, reauthorized in 2008, requires institutions participating in Title IV programs to make general institutional disclosures to students, including retention, graduation and placement data (Section 485). This section also requires the disclosure of certain demographic information, including the percentage of males and female students, Pell Grant recipients, and racial and ethnic minorities.

The Gainful Employment (GE) regulation 34 CFR 668.6, part of the Department of Education's Program Integrity Rules, imposes a series of GE program disclosures:

- Occupations (by name and SOC codes) that the program prepares the student to enter;
- Normal time to complete the program;
- On-time graduation rate for completers;
- Tuition and fees for completing the program in the normal time, costs for books and supplies, and costs for room and board, if applicable;
- Placement rate for completers **if required by state or accreditor**;
- Median educational loan debt incurred by completers in three categories: Title IV loans, private loans and institutional debt.

The regulation requires this disclosure of information to be incorporated into an institution's promotional material whenever feasible. A URL may be substituted in cases where size or format makes including the information unfeasible.

In November 2013, the Department published its first GE disclosure template, standardizing the presentation of disclosure information and requiring its use by no later than January 31, 2014 and applying to disclosures for the 2012-2013 award years. The template exempts from disclosure program information on median student debt and placement rates for programs with fewer than 10 students.

What ACICS Requires

Expectations of transparency, accuracy, completeness and integrity have applied to all information shared by member institutions with prospective students and the public since the formation of voluntary accreditation :

“Each member must...maintain such policies and practices as will reflect credit upon the cause of business education, and that will command respect ... with students and the general public; make no misleading statement or misrepresentations of any kind, either in person or through any agency...”

■ ‘Standards of Practice’

National Association of Accredited Commercial Schools (NAACS), 1914.

The Council has evolved and enhanced those expectations through the development of explicit standards and requirements. The evidence of compliance with those requirements is reviewed as part of the initial and renewal grant accreditation process.

Specifically, the *ACICS Accreditation Criteria* stipulates in two specific sections, “publications” and “performance information,” considerations and requirements regarding student achievement disclosures:

3-1-700. Publications

It is important for institutions to recognize the value of “truth in advertising” when promoting their operations. Publications must be prepared and presented in a professional manner to reflect favorably upon the institution. Information published must be accurate and factual and reflect the current status of the institution.

3-1-704. Performance Information.

Institutions shall routinely provide reliable information to the public on their performance, including student achievement as determined by the institution.

These requirements are routinely applied to all representations to students, including on-line content and a wide variety of printed content: catalogs, enrollment agreements, marketing materials, and advertising, to name a few. When the material is found to be in conflict with explicit standards, the institution is expected to remedy the deficiency or face sanctions by Council, including suspension or revocation of accreditation.

Learn from Others: An Inventory of Best Practices

Creating an inventory of best practices regarding student achievement disclosures requires the development and application of multiple factors that impact information that could help the consumer (student, parent or others involved in the enrollment decision) perform comparative research and make an informed choice based on institutional quality, program integrity and student achievement.

Best practices characteristics regarding disclosure information generally fall into three categories:

- 1) **Ease of Navigation**
- 2) **Information Presentation**
- 3) **Content Richness**

1. **Best Practices – Ease of Navigation**

Consumer disclosure information should be **easy to find**. Tactics that fulfill this characteristic include:

- Placing a separate free standing “Student Consumer Info” link above the fold on the college or school’s home page, or a link that is clearly visible anywhere on the institutional homepage.
- Provide a single click that leads to a consolidated disclosures page
- Provide information on the disclosure page that may include one or more of the following:
 - Retention and Placement Rates as reported to the accreditor
 - Licensure exam pass rates as reported to the accreditor
 - Student, graduate and employer satisfaction rates
 - Measurements of student learning including cumulative GPAs, results of comprehensive examinations, reviews of capstone projects, graded externships, etc.
 - Graduation rates
 - Transfer of credit performance
 - Description of the student complaint process
 - Links to the ‘Net price calculator’ and other federally mandated information categories
 - State level and disaggregated demographic graduation rates
 - A statement that affirms the institutions’ commitment to providing complete and easy access to consumer information (demonstrating openness and transparency)

Other indicators suggested by the Council for Higher Education Accreditation (CHEA) include:

- Date of Next Comprehensive Institutional and Program Accreditation Review
- Brief Description of Student Population
- Admissions Requirements
- Indicators of Effectiveness with Undergraduates As Determined by the Institution:
 - Graduation Year: Number of Graduates, Graduation Rate
 - Completion of Educational Goal (other than certificate or degree), # of Students Surveyed, # Completing Goal
 - Average Time to Certificate or Degree: 1-Year Certificate, 2-Year Degree, 4-Year Degree

- Graduates Entering Graduate School: Year, # of Graduates, # Entering Graduate School
- Success in General Education
- Success in Major Field
- Additional Indicators, if any

Some examples of institutional disclosures that are aligned with the characteristics of best practices include:

<u>Devry University</u>	(Accredited by the Higher Learning Commission)
<u>Madison Media Institute</u>	(Accredited by ACICS)

Disclosures of institutional effectiveness, including student achievement, that fall short of a “best practice” include:

- Placing disclosure information more than two clicks away from the home page
- Burying disclosure related links in a dozen or more other links in an introductory “about” home page tab
- Requiring a separate search engine search of the institution’s website to locate disclosure pages
- Providing Gainful Employment disclosures exclusively, often with information withheld (exempt from disclosure) due to small program size

These approaches to accountability lack a strong commitment to transparency and accessibility, regardless of the strength of institutional performance or the accuracy and veracity of the reported data.

2. Best Practices – Information Presentation:

Student achievement data posted on member institutions websites should be clearly presented, giving prospective and current students a quick and clear overview of required disclosure information. The U.S. Department of Education’s ‘Gainful Employment’ template gives students direct access to some information they may need to make informed enrolment decisions. Any information provided by an institution shall be presented in a manner which avoids creating false, misleading, or exaggerated impressions with respect student achievement information or employment opportunities for graduates.

At minimum, institutions subject to Gainful Employment regulations are required to integrate the Department’s template into their institutional website. Furthermore, institutions are encouraged to disclose student achievement data using infographics, which is a useful tool to present materials to

prospective and currently enrolled students, parents, and other stakeholders in a consumer friendly manner.

Some examples of information presentation that are aligned with the characteristics of best practices include:

Neumont University	(Accredited by ACICS)
New England Culinary Institute	(Accredited by ACCSC)

3. Best Practices - Richness of Information Content:

Institutions that best serve student's need for useful consumer information often provide students with multiple sources of information, giving them a well-rounded picture of their options. Exemplary institutions go an extra mile to provide not only required disclosures but to offer additional information which puts data into context and increases overall understanding. In addition to providing Gainful Employment template figures, institutions benefit students by providing campus wide information on student achievement, or participating in the Voluntary System of Accountability College Portrait system, which compares disclosure information data between institutions. Campus wide information on student achievement might yield important insights to institutional quality and integrity.

Some examples of Richness of Information Content that are aligned with the characteristics of best practices include:

Mendocino College	(Accredited by WASC)
Louisiana State University	(Accredited by SACS)
Virginia College	(Accredited by ACICS)

Schools posting useful, single page overview fact sheets include:

Colgate University	(Accredited by MSCHE)
Stetson University	(Accredited by SACS)

Summary & Inventory:

Member colleges and schools are encouraged to consider and apply the improvement measures below in order to enhance their disclosure of student achievement information. This initiative will not only support compliance with general minimum standards, but strengthen and achieve greater credibility and trust with prospective and current students, as well as with the general public:

- Provide on the homepage a clear and prominently-placed statement of institutional commitment to consumer education and the presentation of consumer information with openness, honesty and transparency.
- Standardize the phrase “student consumer information” rather than use the term “disclosure” in linking to student achievement data. Consumer information is market friendly; disclosure suggests being forced to provide the relevant information. The phrase “student consumer information” or the like should be prominently displayed on the institution’s home page, either free standing or incorporated into the main navigation.
- Collect all disclosures on a single landing page, no more than one click from the home page. Since educational success is arguably most relevant to student consumers, use student achievement as the first disclosure listed, not buried in numerous federally mandated disclosures.
- While student achievement data should be indexed to search engines, search engines should not be the primary means of finding student achievement data. Many consumers may not be willing to conduct a search or may lack an appropriate search term vocabulary to conduct such a search.
- Provide student achievement disclosures at both the program and campus level. While some programs may be stronger and others weaker, a campus view provides insight into campus management and operations, influencing educational quality and integrity. Multi-campus schools may wish to provide a campus-wide rate, but this should not replace the campus level view.
- Little information is available regarding certification or licensure pass rates. Schools should clearly identify whether certification or licensure is required to practice in a given occupation, whether graduates of a given program are eligible to sit for certification or licensure exams, and the pass rates for those exams. Certain professions, such as those in IT, may have a wide variety of certifications which enhance employment prospects but are not absolutely a requirement for entry. These should also be identified and relevant examination pass rates provided.

- Provide a clear and complete definition on how placement rates are calculated. Such a definition should be crafted so as to eliminate ambiguity or gamesmanship in rate calculation.
- Provide a clearly identified link to College Navigator, potentially from an “About” or consumer information page.
- Provide a link to the student catalog but do not use such a link to fulfill the institution’s student consumer information requirement. Consumers are unlikely to page through a lengthy catalog to find student achievement information.
- Infographics are an excellent means of providing “at a glance” student achievement information.

Appendix 1: Additional Measures Proposed by Consumer Groups

Financial

Tuition and fee history	% students in deferment
% students with student loans	% students in forbearance

Demographic

% Pell Recipients	% First time students
Family income quintile	Mean student age
% GI Benefits	% DoD TA
% students in remedial courses	% GED earners
% Part-time Students	

Achievement

Transfer rate	Employer satisfaction
Near term student earnings	Student satisfaction
Long term student earnings	% completers with certificate
Licensure	% completers with AA
Student salary by major	% completers with BA or BS

Operational

Student to Faculty ratio	\$ per student spent on instruction
% faculty with advanced degrees	\$ spent on marketing / advertising
% faculty adjunct	Complaint volumes
Total applied	Staff turnover
Total admitted	Open admissions
Total campus enrollment	Distance education by program
Five year campus enrollment trend	Distance education by enrollment
Program retention	Distance education by completions

Accreditor Specific

Total volume of Title IV
Total portfolio default rate
Total remedial or punitive actions

Appendix II: Institutional and Program-Level Information Recommended By CHEA



INSTITUTIONAL INFORMATION PROFILE

This profile offers information about the performance of an institution in the context of its basic purpose and key features.

Name of Institution

Institution: _____

Institutional Accreditor: _____

Date of Next Comprehensive Accreditation Review: _____

To learn more about the accredited status of the institution, click here: _____

Institutional Context and Mission

Institutional Mission: _____

Institutional Goals: _____

Institutional Type: _____

Brief Description of Student Population: _____

Admissions Requirements: _____

Areas of Special Focus (e.g., liberal arts, vocational education): _____

Indicators of Effectiveness with Undergraduates As Determined by the Institution

1. Graduation

Year: _____ # of Graduates: _____ Graduation Rate: _____

2. Completion of Educational Goal (other than certificate or degree)

of Students Surveyed: _____ # Completing Goal: _____

3. Average Time to Certificate or Degree

1-Year Certificate: _____ 2-Year Degree: _____ 4-Year Degree: _____

4. Annual Transfer Activity

Year: _____ # of Transfers: _____ Transfer Rate: _____

5. Graduates Entering Graduate School

Year: _____ # of Graduates: _____ # Entering Graduate School: _____

6. Job Placement (if appropriate)

Year: _____ # of Graduates: _____ # Employed: _____

7. Licensure/Certification Examination Results: _____

8. Success in General Education: _____

9. Success in Major Field: _____

10. Additional Indicators, if any: _____

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Council for Higher Education Accreditation
PROGRAM INFORMATION PROFILE

This profile offers information about the performance of a program in the context of its basic purpose and key features.

Name of Institution

Institution: _____

Program Accreditor: _____

Institutional Accreditor: _____

Date of Next Comprehensive Program Accreditation Review: _____

Date of Next Comprehensive Institutional Accreditation Review: _____

To learn more about the accredited status of the program, click here: _____

Program Context and Mission

Program Mission: _____

Program Goals: _____

Brief Description of Student Population: _____

Admissions Requirements: _____

Indicators of Effectiveness with Undergraduates As Determined by the Program

1. Graduation

Year: _____ # of Graduates: _____ Graduation Rate: _____

2. Completion of Educational Goal (other than certificate or degree – if data collected)

of Students Surveyed: _____ # Completing Goal: _____

3. Average Time to Certificate or Degree

1-Year Certificate: _____ 2-Year Degree: _____ 4-Year Degree: _____

4. Annual Transfer Activity

Year: _____ # of Transfers: _____ Transfer Rate: _____

5. Graduates Entering Graduate School

Year: _____ # of Graduates: _____ # Entering Graduate School: _____

6. Job Placement (if appropriate)

Year: _____ # of Graduates: _____ # Employed: _____

7. Licensure/Certification Examination Results: _____

8. Additional Indicators, if any: _____

Appendix III: Useful Resources

[ED Disclosures Q&A](#)

[David Bergeron letter regarding GE Template introduction](#)

[Gainful Employment Disclosure Quick Start Guide](#)

[National Postsecondary Education Cooperative: Information Required to be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination](#)

[Ensuring Educational Integrity, National Consumer Law Center](#)

[U-Cann Network](#)

[Voluntary Framework of Accountability Metrics Manual V 3.2](#)

[The Institute for College Access and Success 2013 Comments on ED NPRM](#)

[Institute for Higher Education Policy: Making Accountability Work](#)

[Young Invincibles et al: 2015 Letter to Senate HELP Committee](#)