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Office of the Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW,
LBJ, Room 6W208D
Washington, DC 20202-8240

Re: Docket No.: ED–2022–SCC–0129

Dear Coordinator Mullan,

Thank you for considering our comment on the information collected for the Database of Accredited Postsecondary Institutions and Programs (DAPIP). We appreciate the Department's commitment to ensuring quality and transparency in the higher education accreditation system. We believe that transparency is of the highest importance when it comes to helping students and taxpayers understand whether they are spending their money on a high-quality education. With that in mind, we have given careful consideration to what data elements are most important to collect from accreditors and we thank you for giving careful consideration to these comments.

Some of these comments are very similar to those we submitted alongside the Center for American Progress in 2019.[1] Many of the suggestions in those comments are outstanding, so we raise them again for your consideration.

Is this collection necessary to the proper functions of the Department?

Yes, this collection is necessary for the proper functions of the Department. Accreditation is a vital part of ensuring quality and accountability in higher education. Accrediting agencies' decisions have significant implications for students and taxpayers, but there is limited transparency into how and why accreditors make decisions. Opacity in accreditors' processes make it challenging for students and the public to understand any risks from schools that might be hidden behind accreditor decisions.

Accreditor sanction decisions are a particularly important tool that communicates to students, the public, and institutions when a school is failing to provide students with a high-quality education. There

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[1]
https://www.newamerica.org/education-policy/public-comments/our-public-comments-us-department-education/comments-accreditation-data-collection/

is significant variation in the information that accreditors make public on their websites. This variation makes DAPIP a vital tool for providing consistent information about accreditor actions.

Will this information be processed and used in a timely manner?

We have every confidence that the Department will process and use the data reported to DAPIP in a timely and useful manner. However, there are technical changes that would make the dataset more usable for the public and the Department.

- **Label the dataset with a "last updated" date**. The data download files previously listed the "last updated" date, which ensured members of the public were able to use the latest information. Providing a last updated date also gave users the ability to properly caveat the information. The Department uses similar date-stamping for other datasets; for instance, the College Scorecard maintains a change log that reflects the dates on which data were updated and the information that was changed in that update.

- **Reformat downloadable datasets.** Currently, the Department allows users to download data files. However, the data elements are split into three separate files: Institution/Campus information, Accreditation Records, and Accrediting Agency Actions. As users of these datasets, we rarely use the information from one of these records without the information from another. We strongly urge the Department to consolidate these data files, making the download of a single dataset at least an option, if not the default option. Putting all of the information in a single spreadsheet, with records spanning information about the institution, its accreditation, and actions it has faced, would make the dataset more usable for the public.

- **Include OPE IDs and Unit IDs in all data files.** Currently, the "InstitutionCampus" downloadable dataset includes OPE ID and Unit ID, in addition to the unique DAPIP ID. However, the other two download files include only the DAPIP ID. If the Department chooses not to reformat the three datasets into a single file, we at least recommend that OPE IDs and Unit IDs be included in each individual file. The Department should also ensure that OPE IDs and Unit IDs are required for all Title IV-participating institutions and programs; it is not clear from the user guide that this is a mandatory item for reporting.

How might the Department enhance the quality, utility, and clarity of the information to be collected?

Below, we make several suggestions for improving the usability of the information included in DAPIP.

- **Add credential level and CIP codes as required data elements to be collected for accredited programs**. Currently, it is difficult to understand which programs at an institution are accredited. While the "ProgramName" field provides some information, it is inconsistent on whether it

includes the type of credential or not and does not correspond directly to the Classification of Instructional Programs (CIP) codes used by the Department. Including the credential level and CIP codes as separate fields would ensure that researchers and the Department can more easily determine which specific programs are accredited. This change would also allow comparisons with other federal data, such as the College Scorecard. We request that CIP codes be collected at the 4-digit level at a minimum but suggest collecting them at the 6-digit level to provide the most complete and accurate data.

- **Collect information on accredited programs offered via distance education.** We suggest collecting data on distance education for programs that are accredited by adding a new field that mirrors the definitions for distance education students from the Integrated Postsecondary Education Data System (IPEDS). This field would distinguish whether each program is offered exclusively online, exclusively in-person, or as a hybrid program. This addition to DAPIP would provide the public and policymakers with important information, especially given the ongoing growth in online education. This simple step is also in line with accreditors' requirements to track growth in distance education.[2]

- **Collect information on the number of complaints accreditors receive about institutions and the disposition of those complaints**. There is no publicly available information on the number of complaints accreditors receive about institutions. A high volume of complaints can be an early indicator of issues with an institution and can provide students and the public with vital information about how schools support their students. The Department should begin collecting information on complaints. Providing data on complaints and how accreditors are managing the complaints they receive would significantly enhance transparency. Potential questions the Department could ask accreditors include:
  o The number of complaints received for each institution they accredit;
  o The number of complaints found to have merit after any investigation has been completed; and
  o The number of complaints that led to accreditor action (monitoring, corrective action, etc.).

- **Require that accreditors submit all actions taken to DAPIP.** There is significant variation in how accreditors name and report on the different actions they take. The Department should make it clear to accreditors that they must report on all actions taken, including monitoring, notice, notation, probation, warning, and show cause, among many others.

  Students, policymakers, and the public should be aware when a college is at risk of closure or is facing other serious problems and it should be incumbent upon accreditors to provide that

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[2] 34 CFR 602.19(e)
https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-602/subpart-B/subject-group-ECFR941656d458ef3eb/section-602.19

information. Yet because the types of actions agencies take and their public disclosure policies vary, this information is frequently kept hidden or is difficult to find, protecting the institution while harming the students who enroll unaware of the implications. The Department can increase transparency and improve oversight by requiring that all actions and documentation are reported through DAPIP.

- **Provide a more robust glossary of terms in the data file documentation.** Some information included in the data files is not properly explained in the data documentation. For example, in the "AccreditationRecords" file, there is a column for "EndingActionId". That column includes various numerical codes that indicate "which accreditation action was the action that ended this accreditation record." However, there are no definitions for each numerical code. Ensuring that the public can easily understand the data being presented will significantly improve both the quality and utility of the data.

Please do not hesitate to contact us if you have any questions or would like to discuss these comments. We appreciate your careful consideration of our comments.

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