



# THE ROLE OF EQUITY IN QUALITY ASSURANCE

A Thought Paper from the HLC  
Peer Corps Committee on Diversity

**Authors** Jesse M. Bernal, Ph.D., Grand Valley State University  
Remy Bruder, D.N.P., R.N., Rochester University  
Tim Cruz, M.D., Pima Community College  
Iwalani Else, Ph.D., The College of Saint Scholastica  
Clyne Namuo, Ph.D., Joliet Junior College

## CONTEXT

More than ever, higher education institutions recognize the importance of addressing challenges and identifying opportunities related to diversity, equity and inclusion. The country is growing more diverse, with communities of color comprising a majority by 2045 (Brookings, 2021). According to the U.S. Census projects, the most significant growth will be in the Hispanic population, which is estimated to grow from 17.7% in 2015 to 25.3% in 2045. By 2060, racial and ethnic minority groups are expected to make up over 56% of the population (Pew Research, 2020). Colleges and universities are also more diverse than ever. Today, more than half of all students are students of color or come from low-income households (National Center for Education Statistics, 2021). These demographic shifts raise important questions for higher education institutions committed to diversity, equity and inclusion while facing institutional, systemic, and seemingly unshakeable and harmful historical legacies. Colleges and universities are rooted in a history of exclusion for people of color. Many did not allow access to students of color until desegregation and civil rights laws in 1964 and the passage of the Higher Education Act of 1965 (Stefkovich, J. A., & Leas, T., 1994). Student and community activists have raised awareness of institutions that historically profited

off slavery, buildings dedicated to and named after known slaveholders (Zamudio-Suarez, F., 2021) and members of the Ku Klux Klan (Greenberg, S.H., 2022). National data show continued disparities in access and outcomes based on race and ethnicity (National Center for Education Statistics, 2022).

Whether a moral imperative, economic necessity, or because of student expectations, many institutions continue to recognize the impact of history and are vocally committing to changes that advance equity. As institutions make these commitments to their students and other stakeholders, accrediting bodies maintain a keen interest in ensuring accountability while also providing expanded resources and tools to enable more significant progress for achieving equitable outcomes. This thought paper, prepared by the HLC Peer Corps Committee on Diversity, provides recommendations on the role of equity in quality assurance: how institutions demonstrate alignment to standards and their stated mission and goals, measure and assess the commitment, and show progress and continuous improvement. In addition, this paper seeks to provide opportunities to support HLC and member institutions' responsibility in advancing equity based on a review of previous HLC reports, member institution feedback, and recommendations related to diversity, equity and inclusion.

## BACKGROUND

Findings from two HLC initiatives provide context and purpose for the role of equity in quality assurance: *Testing Student Success Data Findings and Recommendations* (2019) and the *Equity in Access and Success Survey* (2021). In 2019, HLC issued *Testing Student Success Data Findings and Recommendations* based on a process that began in 2017 of defining and measuring student success through the *Testing Student Success Data Initiative*. The initiative included selected representatives from 18 member institutions, which developed a plan to test select variables focused on “accounting for various student goals within the context of personal circumstances” by “considering the most vulnerable populations at an institution” (p. 2). In early 2020, HLC conducted an *Equity in Access and Success* survey in which 361 institutions responded, accounting for 37% of the membership. The survey intended to capture how member institutions responded to equity challenges, how they planned to address them, and how HLC should support their efforts. Specifically, survey results were intended to assist HLC in identifying areas of public interest and need as part of its *EVOLVE 2025* strategic plan and in developing policies and practices responsive to the membership’s efforts to advance equitable access and success in higher education (p. 3). Survey responses were submitted before the outbreak of the COVID-19 pandemic, so they require additional insight given this context.

In a review of these initiatives, including survey results and the current higher education and national landscape, HLC requested the Peer Corps Committee on Diversity develop a thought paper to continue advancing the organization’s efforts to gain a clearer understanding of the role of equity in quality assurance. Formed in 2015, the committee leads HLC’s efforts to increase the diversity of its Peer Corps to better reflect the ethnic and racial diversity within its member institutions. The committee focuses on recruitment and retention of peer reviewers from underrepresented groups within the Peer Corps and development of diversity, equity and inclusion training for the Corps.

## OBSERVATIONS

The *Testing Student Success Data Findings and Recommendations* highlight several findings, including:

- Institutions measure success differently, demonstrating the diversity of student populations and the need to identify appropriate success measures with diverse institutional contexts.

- Institutions have the responsibility to understand their measures in the context of student demographics, perceptions, and intentions.
- There is variability in the ways that students define success at different institutions and further within institutions among academic programs.
- Institutions must be “futures literate” to best serve the needs of their students, who may not always be degree-seeking.

The work of the *Testing Student Success Data Initiative* committee focused on vulnerable populations and highlighted disparities, particularly along socioeconomic lines. For example, 44.8% of food-insecure students persisted two semesters compared to 58% of food-secure students (p. 9). Retention rates for Hispanic, Black, or those who identified as two or more races were 64.8% compared to 78.9% of those who identified otherwise (p. 10). In addition to qualitative disparities, the initiative also found significant differences in expectations and intentions (i.e., goals or expectations) for underrepresented students. For example, a pre-college survey found that “even before beginning their classes, undergraduate students of color were more likely to be considering transferring to another institution.” They also had higher expectations of student-faculty interaction than other students (p. 10).

In addressing disparities between racial and ethnic, and other underrepresented groups, the *Equity in Access and Success* survey highlights differences among institutional approaches and strategies. For example, nearly two-thirds of institutions participating in the survey did not have an institutional definition of equity, while over a third (36%) stated they had a definition for equity relative to “access” (e.g., committing to nondiscrimination and equal opportunity principles, removing barriers to access for underserved communities, providing open access or requiring minimum qualifications for admission). Nearly a third (32%) also maintain definitions relative to “success” (e.g., recognize and address disparities in educational outcomes, foster an inclusive and nurturing campus environment, remove barriers to resources, and support success). In addition, institutions have also begun to identify and define equity gaps more concertedly. Forty percent of the participating institutions indicated they had identified equity gaps concerning “access” to opportunities in higher education (e.g., application and enrollment of underrepresented populations, financial resources for college and program activities, college

preparation and transition skills), and 58% reported having identified equity gaps relative to student “success” (e.g., graduation and completion, retention and persistence, academic progression and coursework performance). Most of these institutions have also developed strategies to address equity gaps in access (78%) and success (81%).

Disparities in educational access and success have been exacerbated through the pandemic, particularly for underserved communities. According to the National Student Clearinghouse Data Research Center, enrollment declines continued to worsen into spring 2022. Total postsecondary enrollment, including undergraduate and graduate students, fell 4.1% or 685,000 students in spring 2022 compared to spring 2021. This decline follows a 3.5% drop last spring, for a total two-year decrease of 7.4% or nearly 1.3 million students since spring 2020. As of May 2022, the undergraduate student body has dropped by almost 1.4 million students, or 9.4%, during the pandemic. The most significant declines have been in the enrollment of students of color (NCES). In the wake of COVID-19 disruptions and increased disparities, public higher education can play a more central role in providing a robust and inclusive path to recovery and economic stability.

## HLC'S COMMITMENT TO EQUITY

Education for a diverse, technological and globally connected world is an HLC Guiding Value. HLC and its member institutions affirm that education must recognize diversity, and the world in which students live is becoming more tech-connected and global.

A contemporary education must recognize contemporary circumstances: the diversity of U.S. society, the diversity of the world in which students live, and the centrality of technology and the global dynamic to life in the 21st century. More than ever, students should be prepared for lifelong learning and for the likelihood that no job or occupation will last a lifetime. Even for the most technical qualification, students need the civic learning and broader intellectual capabilities that underlie success in the workforce. HLC distinguishes higher education in part on the basis of its reach beyond narrow vocational training to a broader intellectual and social context.

### *Higher Learning Commission Guiding Values*

Based on member institution feedback gathered through the *Testing Student Success Data* initiative, *Equity in Access and Success* survey, HLC annual conferences and other engagement efforts, HLC identified “equity” as one of six

major themes in its EVOLVE 2025 strategic plan (p. 2). HLC has set *Equity Goals and Action Steps*, including:

1. Demonstrate equity in HLC’s mission by identifying HLC definitions of equity, diversity, access, and inclusion.
2. Promote equity principles through an understanding of and sensitivity to equity principles in its interactions with institutions and other stakeholders.
3. Assess policies and operations, including internal Principles of Operation and HLC staff development related to equity.
4. Continue to provide public information regarding issues that are impacted by equity considerations.

## RECOMMENDATIONS

Based on a review of the *Testing Student Success Data Findings and Recommendations*, the *Equity in Access and Success* survey results, and the extensive research expertise and practitioner experience of members of the HLC Peer Corps Committee on Diversity, 13 recommendations are provided for consideration to both better understand and also advance equity in quality assurance. These recommendations include identifying relevant definitions, understanding the importance of data, ensuring ongoing learning and development, advancing representational diversity of historically underrepresented communities, and continuing to provide public information and advocacy.

## Definitions

1. Using the *Equity in Access and Success Survey* results, develop and adopt a definition of equity consistent with most common institutional statements. AAC&U provides an example for consideration: “Creation of opportunities for historically underrepresented populations to have equal access to and participate in educational programs that are capable of closing the achievement gaps in student success and completion.” In addition, HLC should utilize the Peer Corps Committee on Diversity’s experience and expertise to develop proposed language shared for feedback with member institutions.

## Importance of Data

2. Require a review and analysis of disaggregated race, ethnicity and socioeconomic (i.e., education and income) data for critical access and success metrics in institutional Assurance Reviews, including enrollment,

retention, persistence, and graduation rates of students and representation of employees. Where possible, comprehensive evaluations should also include qualitative evaluation of the experiences and perceptions of underrepresented institutional stakeholders. This could be intentionally captured during open forums or interviews when conducting reviews.

3. Review EEO/affirmative action plans, if federally required for the institution, and diversity, equity and inclusion plans developed by the institution in the Assurance Review. These plans provide strong evidence to demonstrate an institution's commitment and provide peer review teams with significant insight into progress and opportunities.

## Ongoing Learning

4. Provide tools and training to peer reviewers to enable an effective review and evaluation of data, plans and reports related to equity. The HLC Peer Corps Committee on Diversity should create a tool that identifies common or emerging practices and compelling evidence aligned with each criterion that demonstrate a commitment and efforts to advance diversity, equity, and inclusion.
5. Continue to provide diversity, equity, and inclusion-related training to peer reviewers, and require training on evaluating disaggregated access and success data, reviewing diversity, equity, and inclusion plans, and other related evidence. In addition, HLC should consider requiring training for all peer reviewers at the time of renewing a reviewer's 4-year term. Such training should also include general information on diversity, equity, inclusion, implicit bias, working in diverse teams, and other relevant topics.
6. Continue to provide diversity, equity and inclusion-related training to HLC staff and make participation in this training visible and, where possible, available to member institutions.

## Representation

7. Continue to diversify the Peer Corps, and ensure teams are representative of reviewers from diverse backgrounds. HLC needs more trained peer reviewers and representatives on teams that represent the population of the students the institution is serving.

8. Continue to work to build equity in HLC operations, including diversifying HLC staff. As an agency, HLC has a vital role in modeling its commitment to inclusion and equity for partner institutions.
9. Add coding for federally recognized [minority-serving institutions](#) in the institutional information provided to evaluation teams and in peer reviewer profiles to support a better diversification of teams and the most effective building of teams for reviews. In addition, consider the demographics of institutions not officially designated as minority-serving institutions when assigning peer review teams. Training should be provided to peer reviewers on how to most effectively work with and understand federally recognized minority-serving institutions and the obligations and responsibilities of such institutions.
10. Race and ethnicity are leading factors in educational access and success that HLC and member institutions should prioritize. However, HLC should encourage the expansion of its and member institutions' definitions of diversity beyond race and ethnicity, particularly for institutions located in more racially homogeneous regions. Intersectional diversity should also be considered. HLC and member institutions have an opportunity to advance equity in all contexts. The Peer Corps Committee on Diversity should explore opportunities to advance this recommendation and provide guidance to HLC.

## Information

11. Provide public information on the importance of diversity, equity and inclusion in higher education and identify opportunities to elevate the voices of underrepresented students and employees (See context in "voices of vulnerable populations" p. 3 of *Testing Student Success Data*, 2019).
12. Publish a regular report on emerging practices to advance equity at member institutions. The Peer Corps Committee on Diversity should be consulted on criteria and used in identifying practices for consideration.
13. Identify opportunities to expand the role of a review team chair and the IAC in identifying exceptionally strong examples of an institution's efforts to advance equity. Innovative interventions and practices should be shared at peer review training, the Leaflet, and other avenues to reach member institutions regularly.

HLC is also encouraged to continue advancing recommendations related to diversity, equity and inclusion identified in the *Testing Student Success Data Findings and Recommendations*, the *Equity in Access and Success* survey, and EVOLVE 2025's *Equity Goals and Action Steps*. In addition,

to ensure progress and action towards recommendations identified in this thought paper, HLC is encouraged to develop a mechanism that highlights the consideration of these recommendations and provide regular reports of steps taken, progress, and impact.

---

## Citations

Higher Learning Commission (n.d.). *Guiding Values*. Retrieved online at <https://www.hlcommission.org/Publications/guiding-values.html>.

Higher Learning Commission (2019). *Testing Student Success Data Findings and Recommendations*. Retrieved online at [https://download.hlcommission.org/initiatives/TestingStudentSuccessData\\_2019.pdf](https://download.hlcommission.org/initiatives/TestingStudentSuccessData_2019.pdf).

Higher Learning Commission (2021). *Equity in Access and Success Survey*. Retrieved online at [https://download.hlcommission.org/initiatives/EquityReport\\_2021.pdf](https://download.hlcommission.org/initiatives/EquityReport_2021.pdf).

Higher Learning Commission (2021). *EVOLVE 2025: Equity Goals and Action Steps*. Retrieved online at <https://www.hlcommission.org/About-HLC/evolve-2025-equity.html>.

Higher Learning Commission (2021). *EVOLVE 2025 Strategic Plan*. Retrieved online at [https://download.hlcommission.org/EvolveStrategicPlan\\_2021\\_INF.pdf](https://download.hlcommission.org/EvolveStrategicPlan_2021_INF.pdf).

Stefkovich, J. A., & Leas, T. (1994). A Legal History of Desegregation in Higher Education. *The Journal of Negro Education*, 63(3), 406–420. Retrieved online at <https://doi.org/10.2307/2967191>.

Greenberg, S.H. (2022). U of Alabama Removes KKK Leader's Name From Building. *Inside Higher Education*, February 14, 2022. Retrieved online at <https://www.insidehighered.com/quicktakes/2022/02/14/u-alabama-removes-kkk-leader%E2%80%99s-name-building>.

Zamudio-Suarez, F. (2021). Race on Campus: These Campuses Wanted Buildings Renamed. Administrators Opted to Wait. *The Chronicle of Higher Education*, July 20, 2021. Retrieved online at <https://www.chronicle.com/newsletter/race-on-campus/2021-07-20>.