

# REFRAMING ACCOUNTABILITY: REVIEW OF THE SEAL OF *EXCELENCIA*



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# Executive Summary

Accountability is key for institutions of higher education to assess their impact, inform continuous improvement, and demonstrate value to students, their families, and society. Yet, accountability is too often defined by compliance and standard outcome measures such as enrollment and graduation rates. This definition and approach to accountability does not capture the full story of how an institution is intentionally serving its students. This brief examines how one framework, the Seal of *Excelencia* (Seal), expands the meaning of accountability beyond compliance toward intentionality, equity, and continuous improvement by integrating essential components of transformation into a comprehensive institutional strategy for serving students.

## The Seal of *Excelencia* Framework and Process

The Seal of *Excelencia* is a national certification for institutions that strive to go beyond enrollment to intentionally serve Latino, and all, students, by demonstrating alignment between **data**, **practice**, and **leadership**. Through self-assessment involving both quantitative and qualitative evidence of effectiveness, institutions pursuing the Seal showcase momentum in enrollment, retention, transfer, financial support, representation, and degree completion. The process repositions accountability from external oversight to internal commitment to transparency, evidence of effectiveness, and student success.

## Key Findings

Findings from surveys and interviews with institutions that engaged in the Seal process highlight its effectiveness as a catalyst for institutional transformation by:

- **Building capacity for accountability to improve outcomes for students.** Institutions strengthened their ability to collect, disaggregate, and apply data to improve outcomes and identify inequities.
- **Removing institutional silos and foster collaboration.** Cross-functional teams formed to interpret data and align strategies, reducing silos.
- **Embedding equity in institutional success practices.** Institutions applied data to redesign programs, expand culturally responsive supports, and improve faculty and staff engagement.
- **Validating strategy and signaling intentionality and trust to the community served.** Earning the Seal serves as an external affirmation of internal commitment, building credibility with the institution's students, families, and communities.

## Lessons for Reframing and Evolving Accountability

Three lessons drawn from the Seal of *Excelencia* offer a roadmap for evolving accountability in higher education:

- 1. Accounting for Institutional Readiness and Data Capacity:** Accountability models should meet institutions where they are, accounting for institutions' varying degrees of data capacity, knowledge, and resources.
- 2. Holistic Contextualized Accountability:** Accountability models should be iterative and asset-based, grounded in both quantitative and qualitative data to capture a full understanding of institutional mission, culture, context, impact, and outcomes for students.
- 3. Tracking Momentum Through Longitudinal Data:** Accountability models should use longitudinal data, such as five-year trends, to track momentum and year-to-year progress rather than stand-alone outcomes, and to sustain improvement efforts.

## POLICY RECOMMENDATIONS

The following recommendations outline actionable ways governing boards, accreditors, postsecondary data collection bodies, and Congress can apply lessons from the Seal of *Excelencia* to advance equity-centered accountability.

### Governing Boards

- Promote the use of momentum trends (five years of data) for implementation and consideration of strategic plans for institutions.

### Accreditors

- Add a review of institutional momentum using five years of data in evaluation, as well as an articulated alignment between data, practices, and leadership (institutional plan) to show institutional effort for intentionally serving the students they enroll.

### Postsecondary Data Collection Bodies (College Scorecard, etc.)

- Include momentum measures for educational pathways to degree completion, and allow institutions to submit written summaries of their impact to complement other data provided.

### Congress

- Add criteria to the Title III and V programs of the Higher Education Act to detail institutional momentum measures of progress in key areas of the educational pathway that will be supported with the five-year institutional capacity investment.
- Create a recognition program for institutions disproportionately enrolling and graduating low-income, first-generation students.

Policymakers can scale key elements of the Seal to demonstrate higher education's value and support institutions' continuous improvement to serve their students, families, and communities.

# Introduction

A social contract is created between a student, an institution, and the public when a student enrolls in postsecondary education in the United States. Yet, each frames success in different ways. For students, the goal is to receive a quality education for their investment of time, resources, and effort, leading to economic mobility. For institutions, the goal is to provide a high-quality education that advances their mission and serves their community. For the public, the goal is to provide funds to support access to an affordable, high-quality education that will result in an engaged citizenry and a competitive workforce. Meeting these goals requires *institutional accountability*.

Accountability is key for institutions of higher education to assess their impact, inform continuous improvement, and demonstrate value to students, their families, and society. Traditionally, accountability has focused on compliance-based reporting and standard outcome metrics such as enrollment, retention, and graduation rates. These measures provide important insights, but they often miss other critical dimensions of performance that capture momentum along a student's entire educational pathway, such as transfer, financial support, and degree completion. An opportunity exists to measure what we, as a society, value by expanding accountability beyond compliance and standard outcome metrics to data-driven accountability that can inform performance along students' educational pathway aligned with strategic plans and the community served.

The Seal of *Excelencia* (Seal) provides a framework that moves beyond compliance toward accountability rooted in equity and continuous improvement. This brief examines lessons from the Seal and its process that can inform both institutional transformation and broader accountability efforts in higher education.

## Postsecondary Accountability Landscape

This brief featuring the Seal of *Excelencia* is set in a larger landscape about postsecondary accountability.

**Accountability in postsecondary education is complex due to the segmented nature of the industry and the distinct oversight roles played by a triad of entities, including federal and state governments and accreditation agencies.** Each entity uses its own set of metrics to assess institutional quality and accountability.<sup>1</sup> For example, the federal government uses various metrics to determine an institution's eligibility for federal grant participation. Student loan cohort default rates, repayment rates, and gainful employment regulations are used to determine Title IV (Student Financial Aid) eligibility. To be eligible for Titles III (Strengthening Institutions) and V (Developing Hispanic-Serving Institutions), institutions must submit metrics for two variables: 1) core expenses per FTE and 2) percentage of students with financial need.<sup>2</sup> Additionally, the College Scorecard is a tool created by the U.S. Department of Education to increase transparency, allowing consumers (students and parents) to view federal data on measures like cost, student debt, graduation rates, admissions test scores, acceptance rates, and post-college earnings for each institution listed.<sup>3</sup>

States may use performance-based budgeting or other mechanisms to incentivize public institutions to improve student outcomes. Accrediting agencies, on the other hand, act as external quality stewards. They establish standards institutions must meet to maintain accreditation and access to federal aid, customizing expectations to reflect institutional type and mission.

**Policymakers, researchers, and higher education associations have advanced new approaches to accountability that move beyond traditional metrics like graduation rates for assessing student outcomes<sup>4</sup> to better reflect the diversity in student pathways and institutional contexts.** For example, the Voluntary System of Accountability (VSA)<sup>5</sup> was designed to account for differences across public universities, including the students they serve. Similarly, the Voluntary Framework of Accountability (VFA)<sup>6</sup> embedded measures tailored to community colleges and their distinctive missions. Other initiatives have broadened accountability frameworks to better reflect diverse student experiences and institutional contexts.<sup>7</sup> The American Indian Higher Education Consortium’s American Indian Measures of Success (AIMS)<sup>8</sup> incorporates both quantitative and qualitative indicators of Tribal College success, indicators designed to reflect the goals and stories of Tribal Colleges and Universities and the communities they serve.

The Seal of *Excelencia* was developed in response to Hispanic-Serving Institutions (HSIs) that have no accountability beyond enrollment; HSIs need to show concentrated enrollment of Hispanics, amongst other criteria, to become eligible for capacity-building funds. The Seal goes beyond a traditional accountability framework, emphasizing voluntary institutional self-assessment to demonstrate alignment between data, practice, and leadership in serving Latino,<sup>9</sup> and all, students. Institutions opt into the process, sometimes more than once, in hopes of earning the Seal, a public recognition of their intentional commitment and evidence-based practices.

## Purpose of this Study

This brief examines how accountability can evolve to better strengthen student success and institutional transformation in higher education. Higher Ed Insight (HEI), in collaboration with *Excelencia* in Education, conducted research on the Seal of *Excelencia* to understand what lessons it offers to more broadly facilitate institutional transformation and strengthen accountability. The project aimed to identify lessons that can strengthen institutional improvement and shape broader approaches to accountability. These lessons are offered to support institutional leaders, governing boards, accreditors, and policymakers in advancing policy discussions on expectations for HSIs and other institutions serving underserved communities and accountability measures aligned with student success. The Seal framework holds beyond serving Latino students to serve all.

## Study Design

The study was designed to understand the Seal of *Excelencia* process and the motivations, experiences, and perspectives of institutions who had engaged in the Seal process. The research team used an explanatory mixed-methods design that included multiple data sources and collection methods (see Appendix A for the full study design details):

- Seal certification process and application materials
- Survey of institutions that earned the Seal of *Excelencia*
- Interviews with a subset of [Excelencia in Action network](#) institutions selected to maximize variation and diverse representation

# The Seal of *Excelencia*

The Seal of *Excelencia* is a national certification for institutions that strive to go beyond enrollment to intentionally serve Latino, and all, students. This is a rigorous process of self-assessment, where institutions must demonstrate intentionality and impact across the educational pathway by collecting and using quantitative and qualitative data, implementing evidence-based practices, demonstrating strategic leadership, and aligning all three to earn the Seal of *Excelencia*.

This certification is particularly significant when considering the definition of Hispanic-Serving Institutions, which are defined based on their enrollment of Latino undergraduates. According to the Higher Education Act, an accredited, public or private nonprofit, degree-granting institution qualifies as an HSI if at least 25% of its full-time equivalent undergraduate students identify as Hispanic. However, meeting the enrollment threshold alone does not guarantee that institutions are intentionally serving Latino students. The Seal of *Excelencia* was created to increase accountability for institutions to deconstruct and measure what it means to “serve” students.

Institutions in *Excelencia*’s network of affiliates ([Excelencia in Action](#)), regardless of their HSI status, are invited to participate in this rigorous self-assessment process. Through this process, institutions work in partnership with *Excelencia* in Education across three core components: 1) reviewing five years of **data** and showing momentum in six key areas of the educational pathway (enrollment, retention, transfer in and out, financial support, representation, and degree completion), 2) implementing strategies and **practices** as a result of the data or informed by the data that advance Latino student success, and 3) demonstrating intentional commitment to improve Latino student success through institutional **leadership strategies and investments** (see Figure 1). The alignment across these three components is key to institutional accountability in higher education.

Institutions participate in the Seal of *Excelencia* process as a voluntary self-assessment with the goal of transforming their institutions by demonstrating alignment in these three areas across the educational pathway.

**Figure 1. Seal of *Excelencia* Framework**



Data	Practice	Leadership
<p>Intentionally identify &amp; respond to race/ethnic-based inequities (5 years of data)</p>	<p>Consistent &amp; transparent use of evidence-based programs &amp; policies (3 practices with impact data)</p>	<p>Alignment of data &amp; practice with explicit &amp; public commitment to improving Latino student success (strategic plan)</p>
<ol style="list-style-type: none"> <li>1. Enrollment</li> <li>2. Retention</li> <li>3. Transfer In/Out</li> <li>4. Financial Support</li> <li>5. Representation</li> <li>6. Completion</li> </ol>	<ol style="list-style-type: none"> <li>1. Enrollment</li> <li>2. Retention</li> <li>3. Transfer In/Out</li> <li>4. Financial Support</li> <li>5. Representation</li> <li>6. Completion</li> </ol>	<ol style="list-style-type: none"> <li>1. Mission &amp; strategy</li> <li>2. Data &amp; Practice</li> <li>3. Human Resources</li> <li>4. Communication</li> <li>5. Institutional Culture</li> </ol>

Source: *Excelencia* in Education (2025)

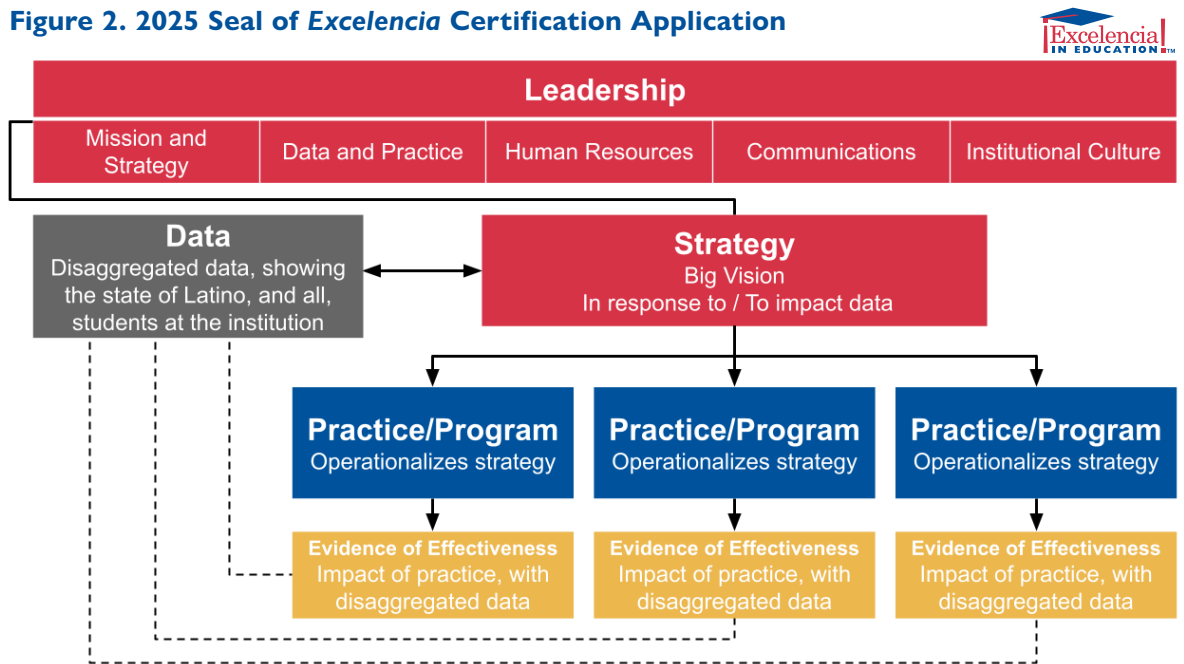
## Seal of *Excelencia* Self-Assessment Process

Committing to continuous improvement and accountability requires commitment from top leadership as well as from core practitioners working with students. Therefore, to apply to earn the Seal of *Excelencia*, institutional leadership must articulate two commitments: 1) to become a place where Latino, and all, students can thrive, and, 2) to hold the institution accountable to the community they serve. One way to manifest these commitments is for an institutional leader to be affiliated in the *Excelencia* in Action (E-Action) network, where they become part of a community of practice and begin a journey to becoming institutions where Latino, and all, students thrive. While each institution determines its own pace of progress and engagement, there are tools and resources offered to affiliates to facilitate their progress, including the Seal of *Excelencia* self-assessment.

Through the Seal of *Excelencia* assessment process, institutions assemble a cross-campus team of representatives from academic affairs, student affairs, institutional research, faculty, and other offices and departments to complete the self-assessment. As part of this process, teams collect a wide range of information (both quantitative and qualitative), including institutional background; enrollment, retention, transfer in and out, financial support data, representation of faculty, administration, and staff; and outcome data related to completion and post-completion for Latino, and all, students.

Each section asks for disaggregated metrics over five years, clearly articulated strategies, and a description of three programs or practices that demonstrate progress and impact in serving Latino students amongst all in those six areas (see Figure 2). Institutions are also asked to detail their broader institutional context.

**Figure 2. 2025 Seal of *Excelencia* Certification Application**



Source: *Excelencia* in Education (2025)

For example, in the enrollment section, institutions report five years of fall undergraduate enrollment data for all students and Latino students, along with the percentage change over time. They are also asked to describe their enrollment strategy, identify academic majors where Latino students are underrepresented, explain the strategies they are using to increase Latino representation in those areas, and indicate whether the institution's racial and ethnic demographics reflect those of the surrounding community. In addition, they must name three specific programs or practices that show

evidence of effectiveness in advancing their Latino students. These additional metrics highlight the heart of *Excelencia's* work, looking beyond the numbers to uncover gaps, connect those gaps to intentional programs and practices, and drive meaningful change in Latino student enrollment and success.

Beyond student outcomes and programmatic efforts, the application also solicits information on institutional leadership, strategic vision, data capacity and infrastructure, staffing and human resources, communication strategies, and institutional culture. Institutions are further invited to share any additional information that reflects their commitment to intentionally serving Latino students, even if that information is not directly addressed in the rest of the application. The application process offers institutions the opportunity to share their transformation stories and demonstrate intentional efforts to support Latino student success. The institutional team collaborates internally to ensure that their application reflects the alignment of data, practice, and leadership at their institution and explains how they will make data-informed decisions to intentionally serve their students.

Within the Seal of *Excelencia* framework, *Excelencia* defines “alignment” as the extent to which data, practice, and strategy are cohesively integrated both within each section of an institution’s Seal application and across the application as a whole. Alignment is evaluated based on how clearly and effectively institutions demonstrate the connection between their strategic goals, the practices they implement, the data they collect and report, and the institutional commitment to transform to intentionally serve their Latino, and all, students.

A strong application illustrates alignment by showcasing how an institution’s strategies are informed by, or inform, key data trends, highlighting both areas of strength and areas for improvement, and how the institution is actively responding to these insights. Practices should be clearly aligned with the strategies they are intended to support, showing a direct link between institutional priorities and the actions taken to achieve them.

In addition, the use of disaggregated data is essential. Institutions are expected to go beyond simple data metrics of participation to demonstrate the specific impact of their practices on Latino students. Alignment is assessed by examining how well the institution-wide strategies outlined in the Leadership section are reflected and reinforced throughout the practices and data shared in the application.

## **Excelencia Technical Assistance Resources**

*Excelencia* in Education has developed a technical assistance (TA) strategy designed to—

- meet institutions where they are in their transformation journey, and
- strengthen institutional capacity for more intentional and effective service to students.

This approach supports institutions in aligning data, practice, leadership, and student-serving strategies within a community of professionals committed to advancing intentional service for Latino, and all, students. By fostering this collaborative environment, *Excelencia* partners with institutions to meet their goals by offering tools, resources, and language to engage in data-informed decision-making.

## **Institutes**

*Excelencia* offers TA through a series of institutes held throughout the year. These include the Data Institute, the Evidence-Based Practices Institute, and the Alignment Institute. *Excelencia* provides institutional teams of up to five members with opportunities to engage in interactive sessions led by subject matter experts, policymakers, researchers, and higher education leaders. The institutes are grounded in asset-based discussions that explore leadership, data, practice, and policy through a Latino lens. Teams learn and collaborate in supportive environments, exchanging strategies, sharing strengths,



and identifying areas for growth with peer institutions. Each institute also provides dedicated time and space for teams to reflect and develop tactical action plans for implementation on their campuses. Following the in-person experience, institutions remain engaged through virtual follow-up sessions at three, six, and twelve months, continuing their learning and connection with a broader network of institutions committed to intentionally serving Latino students.

Any institution may participate in *Excelencia's* TA, with those affiliated in the E-Action network prioritized among the limited spots. TA opportunities are available through two pathways. One is a “bundle”

option, in which institutions opt into a set of offerings that includes participation in one or more technical assistance institutes. The specific institute an institution attends is based on its current stage in the transformation process. Alternatively, institutions may apply individually to participate in a specific institute that aligns with their goals and readiness.

### **Seal Serving Institutional Transformation Assessment (SSITA)**

Some institutions are setting goals in earlier stages of their assessment journey, as they begin to advance their institutional priorities and make resources available to encourage and sustain the work required to intentionally serve Latino, and all, students. Alongside the Seal, *Excelencia* in Education offers the Seal Serving Institutional Transformation Assessment (SSITA). The SSITA is a streamlined self-assessment tool developed as an earlier assessment tool for institutions that are in more nascent stages of using data, practice, and leadership to inform their community accountability and are not ready for the more comprehensive Seal of *Excelencia* certification. SSITA supports institutions in identifying who they are serving and identifying strengths and areas for improvement. In doing so, SSITA also lays the groundwork for strategic efforts and student-centered plans that will require more intensive assessment for improving Latino student success.

SSITA includes six sections (compared to eleven in the Seal assessment) and requires two years of institutional data (as opposed to five in the Seal assessment). Institutions are asked to submit three to six practices with evidence of effectiveness, while the Seal requires 18 evidence-based practices. However, both SSITA and the Seal assessment are aligned to the technical assistance offered to support institutions throughout the process of telling their story of accountability and value.

Together, the Seal of *Excelencia*, the SSITA, and the accompanying technical assistance institutes form a cohesive, responsive framework for institutions to 1) know both who they're serving and not serving, 2) align their data with their practices and values, and 3) ensure Latino, and all, students are intentionally served. As a result, the framework not only recognizes institutions for their commitment to Latino student success but also equips them with the tools, data, and guidance needed to sustain and deepen their accountability and commitment to student success.

# Strengths Of The Seal of *Excelencia*

Drawing primarily from survey and interview data, this section presents key findings related to the Seal of *Excelencia*'s strengths. A subset of institutions that have applied for the Seal was selected for this project to be indicative, rather than exhaustive, of institutional contexts and efforts when applying for the Seal. This group included institutions from different geographic regions, HSIs and non-HSIs, institutions that applied for the Seal of *Excelencia* one or more times, those that applied for recertification, and those that had not yet earned the Seal of *Excelencia*. This approach allowed the research team to better understand the nuanced institutional contexts and factors that influence institutional engagement with the Seal of *Excelencia* process. For more on data sources and methodology, see Appendix A.

Findings demonstrated that the Seal of *Excelencia* application process helps institutions—

- Build capacity for accountability to improve outcomes for students,
- Remove institutional silos and foster collaboration,
- Embed equity in institutional success practices, and
- Validate strategy and signal commitment to the community served.

These strengths are detailed in the following sections.

## **Building Capacity for Accountability to Improve Outcomes for Latino, and All, Students**

The Seal of *Excelencia* requires institutions to systemically collect, disaggregate, and apply data across six key student success metrics: enrollment, retention, transfer, financial support, degree completion, and representation. Before engaging in the Seal process, only 75% of surveyed institutions disaggregated data by race/ethnicity. After participating, all institutions reported doing so. This shift set a new baseline of accountability by ensuring Latino student-specific outcomes were more visible.

The Seal's rigorous data requirements pushed institutions to critically assess effectiveness and equity in their programs. This process surfaced disparities and informed changes in policies, student support services, and resource allocation. Meeting these requirements demanded significant institutional capacity—often involving investments in data infrastructure, designation of staff with diverse skillsets from across campus, and collaborative reflection to interpret findings meaningfully.

As a result, institutions reported more systematic use of multiple data points, particularly student course data and financial aid data. The requirements to provide five years of disaggregated data offered a longitudinal perspective, allowing institutions to track momentum, monitor progress, and identify areas for improvement. This longitudinal view positioned leaders to distinguish between short-term variations and real systemic change. This process also strengthened institutional buy-in and more intentional alignment of resources to better serve students.

## **Removing Silos & Fostering Collaboration to More Intentionally Serve Latino, and All, Students**

The Seal also promotes cross-campus collaboration by requiring institutions to assemble cross-functional teams. Prior to the Seal assessment, only 40% of surveyed institutions had assembled a cross-departmental team coordinating data collection. After engaging in the Seal process, 95% had established such teams. This change instated collaboration that had previously depended on ad hoc relationships and coordination.

These institutional teams typically included senior leadership, institutional research staff, student affairs professionals, and academic affairs representatives. Institutions emphasized that having a dedicated project manager or coordinator was essential for maintaining continuity amid staffing changes and managing the complexity of the assessment.

Bringing together diverse stakeholders helped break down silos, reduce duplication, and build stronger communication structures. This collaborative engagement not only strengthened the Seal applications but also improved institutional alignment overall. Institutions reported that cross-functional collaboration enabled them to identify inconsistencies in data collection and interpretation, recognize patterns affecting student success, and design strategies to more intentionally serve Latino, and all, students.

After engaging in the Seal process, more formalized communication and collaboration positioned departments to better align programming and strategically target student populations to maximize impact. Resources could be allocated more efficiently and student services tailored more precisely. Beyond the application, institutions recognized that cross-departmental collaboration remains essential for accountability and long-term institutional transformation.

## **Embedding Equity in Institutional Success Practices**

Interviewed institutions highlighted that going through the Seal assessment process produced lasting institutional change, including improved recruitment and retention strategies, enhanced student support services, stronger academic outcomes, and more inclusive curricular practices.

Several institutions expanded faculty and staff development with renewed focus on Latino student needs. Others described leveraging the Seal as a launching pad for new initiatives or embedding its principles in strategic planning. For example, one institution created a dedicated HSI department, while another connected with a national network of like-minded educators.

Institutions valued the Seal as more than a certification, describing it as a collaborative framework and reflective process to facilitate continuous improvement. In this way, the Seal functioned as both a mirror, revealing gaps and opportunities for improvement, and a guide toward more equitable practices. Institutions spoke to how the Seal supports both operational improvements and broader shifts in institutional identity and mission. Many institutions noted that long-standing relationships with *Excelencia*, built on *confianza* (trust-based approach), motivated them to pursue the Seal and sustained their commitment to continuous transformation toward intentionally serving Latino, and all, students.

## **Validating Institutional Strategy and Signaling Commitment to the Community**

Institutions cited four key internal benefits of earning the Seal: 1) validation of strategic direction, 2) improved data analysis, 3) enhanced storytelling about student success, and 4) sustained focus on Latino student outcomes.

They also emphasized the value of the Seal as an external signal of intentionality in serving Latino students. Institutions reported that this recognition increased visibility, strengthened community trust, and functioned as a recruitment tool for both students and faculty. Some institutions

leveraged the Seal certification to seek out and secure additional funding opportunities. Beyond influencing policymakers and funders, this recognition also matters for families and parents, who may not look at federal or institutional data reports and dashboards but can clearly understand the Seal as a trusted signal of an institution's commitment to Latino student success.

Findings from surveyed and interviewed institutions show that the Seal of *Excelencia* is more than a certification. It is a catalyst for institutional change. The Seal strengthens data capacity and accountability, requiring institutions to disaggregate and use data to drive equity-focused decision-making. It breaks down silos by fostering cross-campus collaboration and building sustainable structures for accountability. Institutions reported that the process drives lasting transformation, from new student support strategies to shifts in mission and identity, while also validating their efforts and powerfully signaling intentionality to students, faculty, and communities.

The Seal of *Excelencia* has established a strong and respected framework for helping institutions strengthen data capacity, foster collaboration, and embed equity in student success. Beyond validation, *Excelencia* was interested in learning from their institutions not only the things that worked well but also opportunities for improvement. The institutions' feedback highlights opportunities to make the process clearer, more accessible, and less burdensome. These recommendations for process refinements are detailed in Appendix B.

## **Evolving Accountability: Lessons from the Seal of *Excelencia***

Lessons drawn from the Seal of *Excelencia* can inform other efforts to reimagine how accountability is defined and practiced across the postsecondary sector. The lessons gleaned from this project suggest that a readiness-based and context-sensitive approach offers a promising pathway for other institutions to replicate or scale the Seal of *Excelencia* framework. By recognizing variation in institutional data capacity, leadership priorities, and student populations, accountability models can better meet institutions where they are and provide support that expands participation in improvement efforts.

### **Accounting for Institutional Readiness and Data Capacity**

**Institutional readiness varies, and accountability models are most effective when they meet campuses where they are by aligning supports to their data capacity, knowledge, and resources.**

A key lesson is that institutions vary significantly in their ability to collect, analyze, and apply data to support student success. Without attention to these differences, accountability systems risk excluding those serving the highest concentrations of underserved students or reinforcing existing inequities. A readiness-based approach ensures that institutions have the supports they need to maximize the benefits of accountability efforts.

Readiness for accountability can be understood across three dimensions: 1) capacity, 2) knowledge, and 3) resources. Readiness includes both institutional infrastructure and culture. Some institutions maintain robust research offices, established data systems, and leadership committed to evidence-based practices, while others may need additional support to maintain alignment between data, practice, and leadership. These differences require targeted support. Partnerships with external organizations, state agencies, and philanthropic actors can supplement institutional efforts and extend available supports in these dimensions. Institutions interviewed emphasized that readiness is not just about infrastructure or staff expertise; it also requires leadership buy-in to align data with institutional priorities and ensure the data inform everyday practice.

Credible and usable data systems are also critical. Institutions must invest in 1) infrastructure that ensures accurate, timely information and 2) personnel who can interpret results with fidelity. Extending data fluency to as many groups as possible enables and improves a data-informed culture at an institution.

## **Holistic Contextualized Accountability**

**Accountability is enhanced when quantitative metrics are examined within the context of qualitative narratives that capture institutional mission, culture, and the diversity in student populations and campus contexts.**

Equally important is the value of holistic and contextualized accountability, which allows institutions to highlight areas of growth and transformation that may be obscured by only focusing on traditional metrics (e.g., enrollment, retention, and graduation rates).

A holistic approach reframes accountability as both quantitative and qualitative, asset-based rather than deficit-oriented, and iterative rather than static. In practice, data points are expansive and not treated as an endpoint. Once collected, diverse stakeholders begin the process of collaborating to interpret findings, contextualize results, and identify refinements in practice, disrupting siloed cultures and aligning data with practice. When collaboration was successful, institutions reported that data and narratives were more effectively aligned with practice, creating accountability processes that felt actionable rather than abstract.

While quantitative data provide important benchmarks, accountability processes are more meaningful when paired with qualitative insights from institutional leaders, faculty, advisors, students, and community partners. This integration ensures that the diverse experiences of student populations are visible in accountability efforts. Such an approach acknowledges that progress cannot be fully understood without considering institutional culture, campus climate, and the evolution of mission. By situating metrics within broader institutional narratives, accountability becomes more reflective of the multifaceted nature of transformation.

## **Tracking Momentum Through Longitudinal Data**

**Sustainable transformation requires tracking momentum over time, using longitudinal and intermediate measures that show progress beyond final outcomes.**

Our study also underscored the importance of tracking momentum. Five-year disaggregated reporting allows institutions to monitor progress and sustain improvement efforts. Accountability systems that focus exclusively on outcomes such as stand-alone graduation rates risk overlooking intermediate markers of success. Tracking year-to-year improvements in retention, credit accumulation, or gateway course completion helps sustain energy and commitment while building toward long-term outcomes. Institutions also noted that tracking momentum helped leadership align long-term strategies with near-term indicators of progress, keeping campus priorities connected to evidence of change.

Aligning reporting requirements with institutional timelines and funding calendars can strengthen accountability by ensuring that data collection aligns with how institutions implement change.

Taken together, these lessons highlight how the Seal of *Excelencia* informs a broader vision of equity-centered accountability. Institutions not only strengthened their capacity to use data but also learned to contextualize metrics, track momentum, and align leadership with practice. These insights underscore the importance of readiness-based and context-sensitive approaches that meet institutions where they are. As higher education leaders and policymakers consider scaling accountability models, the Seal of *Excelencia* offers both proof of concept and guidance for evolution.

## POLICY RECOMMENDATIONS INFORMED BY THE SEAL:

# Linking Institutional Accountability to Student Success

The Seal of *Excelencia* provides a rigorous, data-driven certification framework that requires colleges and universities to show intentionality and measurable results in advancing Latino student success. Unlike the federal HSI designation, which is based only on enrollment, the Seal ties institutional recognition to **evidence of impact using data and practice** improvements in enrollment, persistence, transfer, completion, financial support, and Latino representation in faculty/staff and leadership. In addition, the alignment of **data, evidence-based practices, and leadership**—defined as elements of an institution’s strategic plan—is a concrete way to show policymakers that institutions are not only enrolling students from underserved backgrounds, but also **delivering value through institutional investments that result in positive student outcomes**.

### Expanding the Framework Beyond HSIs

While informed by efforts to better understand quality at HSIs and, more broadly, serving students, the Seal’s organizing framework is transferable to other types of institutions serving underrepresented or low-income populations to inform continuous improvement with these populations, as well as measure impact on degree completion and student success. The methodology (pairing disaggregated data analysis, evidence of intentional practices, and leadership commitment) offers a **model of accountability** that accounts for diverse institutional contexts.

This model creates an opportunity for state and federal policymakers to adopt or adapt Seal-like measures that are more equitable than current accountability systems, which often penalize under-resourced institutions without recognizing their progress or mission-driven work. By explicitly tying recognition to aligned data, evidence-based practices, and leadership, policymakers can encourage institutions to embed equity and student success at the core of their mission and institutional strategic planning.

### Advancing Equity and Value in Public Policy

From a policy perspective, the Seal reinforces three major themes in higher education value debates:

- **Equity in access and completion:** Disaggregated data ensures that policymakers see how different groups fare, not just averages.
- **Institutional transformation:** Certification requires strategic planning, investment in evidence-based practices, and leadership accountability, demonstrating value beyond one-off programs.
- **Economic and social mobility:** By focusing on completion and support, the Seal connects directly to state and federal goals of reducing student debt and expanding workforce participation.

The Seal supports the case that **value must also be understood as equitable student success, not just return-on-investment (ROI) measures like earnings**. This evidence base can help policymakers shift from compliance-driven accountability to **continuous improvement models** that better reflect institutional value for underserved students. In short, the **Seal of *Excelencia* offers policymakers a tested, equity-driven accountability framework** that can demonstrate higher education's value by centering student success, institutional transformation, and equitable outcomes.

The Seal of *Excelencia* also addresses an inherent tension in accountability between internal and external audiences. All institutions participating in Title IV (federal financial aid) are required to submit data to the federal government for external reporting, and some of this data is used to compare institutions to others with select metrics. Institutions can also use their data internally for continuous improvement. The goal of the Seal of *Excelencia* was to better align the data used for the two audiences in a way that could better inform both about the value of the institution.

The following are five **policy recommendations** for using key elements of the Seal of *Excelencia* for a wider audience.

#### **Governance Boards:**

- 1. Promote the use of momentum trends (five years of data) for implementation and consideration of strategic plans for institutions.** Offer direct resources, facilitate access to data tools, and support capacity-building efforts.

#### **Accreditors:**

- 2. Add a review of institutional momentum using five years of data in evaluation, as well as an articulated alignment between data, practices, and leadership (institutional plan) to show institutional effort for intentionally serving the students they enroll.** Provide technical support for institutions' capacity-building efforts.

#### **Postsecondary Data Collection Bodies (College Scorecard, etc.):**

- 3. Include momentum measures for educational pathways to degree completion, and allow institutions to submit written summaries of their impact to complement other data provided.**

#### **Congress:**

- 4. Add criteria to the Title III and V programs of the Higher Education Act to detail institutional momentum measures of progress in key areas of the educational pathway that will be supported with the five-year institutional capacity investment.**
- 5. Create a recognition program for institutions disproportionately enrolling and graduating low-income, first-generation students.** As part of the criteria, institutions should articulate how they are meeting their mission, advancing a quality education, serving the students they enroll, meeting community/public needs, and contributing to the economy and workforce.

The Seal of *Excelencia* is a rigorous, data-driven framework that centers student success, institutional transformation, and equitable outcomes. Policymakers can scale key elements of the Seal to demonstrate higher education's value and support institutions' continuous improvement to serve their students and the nation more broadly.

# Appendix A - Study Design

This brief draws on a comprehensive review of the Seal of *Excelencia* certification process, its use for community accountability, and how it drives institutional transformation. Policy researchers at Higher Ed Insight (HEI) collaborated closely with *Excelencia* researchers to co-develop a data collection strategy that included both qualitative and quantitative components.

Primary data sources included internal program documents, institutional Seal applications, and application-related data provided by *Excelencia*. HEI researchers and *Excelencia* staff jointly designed and refined a survey instrument and interview protocol to capture a broad range of institutional experiences and perspectives.

A subset of institutions that have applied for the Seal was selected for this project to be indicative, rather than exhaustive, of institutional contexts and efforts when applying for the Seal. This group included institutions from different geographic regions, HSIs and non-HSIs, institutions that applied for the Seal of *Excelencia* one or more times, those that applied for recertification, and those that had not yet earned the Seal of *Excelencia*. This approach allowed the research team to better understand the nuanced institutional contexts and factors that influence institutional engagement with the Seal of *Excelencia* process.

In addition, an online survey was administered to all institutions that had earned the Seal of *Excelencia* as of Spring 2025. The survey gathered information on institutions' motivations for applying, perceived benefits of participating in the certification process, and the ways institutions leveraged the Seal as a tool for accountability and transformation efforts. Respondents identified the most valuable components of the process and provided insights on the potential for scaling similar certification initiatives across other institutional contexts. In addition, HEI and *Excelencia* staff interviewed institutional representatives from a subset of institutions that participated in this online survey.

This explanatory mixed-methods approach enabled a richer understanding of how institutions experience, implement, and leverage the Seal of *Excelencia*. It also highlighted lessons that may be applied to future policy and practice to strengthen accountability across higher education.

# Appendix B - Seal of *Excelencia* Process Refinements

The Seal of *Excelencia* has become a well-regarded model for advancing data capacity, collaboration, and equity in student success. As part of this project, *Excelencia* also sought to capture institutions' perspectives on how the process might be strengthened. Institutions' feedback pointed to several ways the Seal process could be made clearer, more accessible, and easier to navigate.

Building on these insights, we recommend the following potential process refinements to the Seal process:

- **Provide Early Guidance on Data & Narrative Integration.** Clearer direction at the start of the process on how to pair quantitative data with narrative context would help institutions craft stronger, data-informed applications.
- **Streamline Data Requests.** Participants note that some data felt duplicative, suggesting opportunities to reduce redundancies in the application.
- **Reconsider Recertification Cycles.** Acknowledging that some change efforts take longer to realize than others, the current three-year recertification cycle is intended to capture early momentum to support storytelling. However, some institutions expressed that extending the Seal's recertification from three to five years would allow new initiatives more time to demonstrate impact. This tension highlights the need to balance institutional capacity with the value of more frequent progress checks.
- **Align Deadlines with Academic Calendars.** Institutions pointed out that application and research timelines sometimes conflicted with peak campus periods (e.g., graduation), suggesting that better timing could ease participation.

These recommendations to refine the Seal build on its existing strengths, while responding to the experiences of institutions that have engaged in the process. Through these refinements, the Seal could increase accessibility and impact, while also modeling improvements that other accountability efforts might adopt across higher education.

# Endnotes

- 1 Higher Learning Advocates, 101: Higher Education and the Triad (December 2017), <https://www.higherlearningadvocates.org/>; David E. Leveille, *Accountability in Postsecondary Education Revisited* (June 2013), Center for Studies in Higher Education, CSHE.9.13, <https://cshe.berkeley.edu/publications/accountability-postsecondary-education-revisited-cshe913>
- 2 U.S. Department of Education, “Eligibility Designations for Higher Education Programs” (last reviewed June 24, 2025), <https://www.ed.gov/grants-and-programs/grants-higher-education/eligibility-designations-higher-education-programs>
- 3 U.S. Department of Education, College Scorecard, <https://collegescorecard.ed.gov/>
- 4 Some recent examples include:
  - Brookings Institution, *Towards a Framework for Accountability for Federal Financial Assistance Programs in Postsecondary Education* (2023), <https://www.brookings.edu/articles/towards-a-framework-for-accountability-for-federal-financial-assistance-programs-in-postsecondary-education/>
  - Bipartisan Policy Center, *Accountability Proposal Report* (July 2024), <https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2024/07/Accountability-Proposal-Report.pdf>
  - Urban Institute, *Developing a Multi-Metric Accountability System for Postsecondary Institutions* (2020), <https://www.urban.org/research/publication/developing-multimetric-accountability-system-postsecondary-institutions>
- 5 Christine M. Keller, “Lessons from the Voluntary System of Accountability (VSA): The Intersection of Collective Action & Public Policy,” *Change: The Magazine of Higher Learning* 46, no. 5 (2014): 23–29, <https://eric.ed.gov/?id=EJ1041379>
- 6 Jonathan M. Young, Edward R. Hines Jr., Jessica Sun, Craig Deville, and James K. Sullivan, *Accreditation and Student Success: A Policy Brief from the National Student Clearinghouse Research Center* (2018), <https://eric.ed.gov/?id=ED594235>
- 7 Examples include:
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  - Pell Institute for the Study of Opportunity in Higher Education, *Indicators of Higher Education Equity in the United States: 2024 Historical Trend Report* (2024), [https://www.pellinstitute.org/wp-content/uploads/2024/05/PELL\\_2024\\_Indicators-Report\\_f.pdf](https://www.pellinstitute.org/wp-content/uploads/2024/05/PELL_2024_Indicators-Report_f.pdf)
  - American Council on Education, *Race and Ethnicity in Higher Education: A Status Report* (2019), <https://www.acenet.edu/Research-Insights/Pages/Race-and-Ethnicity-in-Higher-Education.aspx>
- 8 American Indian Higher Education Consortium, *American Indian Measures of Success (AIMS)*, <https://www.aihec.org/student-success/research/aihec-aims/>
- 9 For the purposes of this brief, we use the term Latino to refer to students whose origins are Mexican, Puerto Rican, Cuban, Central or South American, or other Latino backgrounds, regardless of race (the same definition used by *Excelencia* in Education).



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