

**COUNCIL FOR
HIGHER EDUCATION ACCREDITATION**

**WHERE DO WE TAKE
ACCREDITATION?**

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Where Do We Take Accreditation?

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“Where do we take accreditation?” Initially I was a bit put off by the question of where we take accreditation, concerned it seemed presumptuous. Who was the *we*, I asked? And what about the word *“take”* that implies that accreditation needs to be taken somewhere and changed from its current circumstance? While I believe that to be true, was it presumptuous to make that assumption up front?

Still, the more I wrestled with the question, the more on-target it seemed to be. The *“We,”* of course, is *all of us*, the academic community broadly defined -- faculties, academic leaders and professional and scholarly associations, across a very large and diverse academic landscape. It is this inclusive *“we”* that must be accountable for the quality of American higher education. So, yes, *“Where do ‘we’ take accreditation?”*

And yes, we should assume accreditation needs to change. To do otherwise ignores a mountain of evidence to the contrary. And it ignores the entire history of higher education accreditation that has been one of adaptation to changing times and circumstances.

With that as backdrop, where indeed do we take accreditation? While the accreditation enterprise is not presently in crisis, the tradition of academic self-regulation and self-administered quality assurance remains vulnerable. I will argue accreditation must change and grow stronger if it is to survive. The question is how. How can the community accomplish that, and where do we find the road map toward a stronger sustainable future?

While I will suggest five possible responses, I hope these possibilities will stimulate an independent assessment and some ideas of your own.

Credibility

I believe the most obvious and essential ingredient for a strong future for accreditation is *credibility*. As we learned so tragically in recent months, when credibility and trust falter, as in the banking and financial systems in our country and around the globe, the entire enterprise is in danger. The fall can come quickly, with little warning, and disastrous consequences.

So too, *credibility* is the life blood of accreditation. Those closest to the enterprise-faculties and academic leaders-must have confidence in the integrity of the judgments and the reliability of the system. Others who depend on credible judgments of academic quality – employers, parents, students, governments and the general public -- must trust the system.

Put another way, accreditation must have robust legitimacy within the academy and beyond it. Without that legitimacy and the credibility and confidence that support it, the system can collapse.

Time of Doubt

Accreditation has had near-death experiences in the past, and yet, in spite of the critics, the enterprise has survived. No challenge was more serious than the collapse of confidence in the Nineties. Reauthorization of the Higher Education Act in 1992 focused on excessive student loan default rates. Accreditation was targeted – many would argue unfairly -- for failing to monitor and impose sanctions on offending institutions.

The crisis of confidence at the federal level was sufficient that Part H of the reauthorized legislation omitted any reference to accreditation as a gatekeeper and put in place a framework for State Postsecondary Review Entities, SPREs as they were affectionately known, which authorized new state and federal entities for academic quality assurance. Not surprisingly, the idea was not well received by academics.

A national debate over accreditation and its future ensued and some of the system literally came unglued. The central coordinating mechanism for accreditation, the Council for Postsecondary Accreditation (COPA), was seen as ineffective and was dissolved by accreditors and the

academic community. A National Policy Board was created to bring about consequential reform in accreditation, but its formation and the proposals that followed only served to confuse and further weaken confidence in accreditation.

Ultimately a Summit on the future of accreditation involving university presidents, association heads and others was called. Criticisms of accreditation were many. Accreditation was described by some as “meaningless” and a waste of time and money. It was criticized for failing to distinguish between levels of academic quality, focusing on minimal rather than aspirational standards. Accrediting groups were charged as being weak, too often leaving sub-par programs and institutions unchallenged.

Some saw accreditation and its regional structure as a quaint relic of the past, no longer relevant. Others bemoaned the “proliferation” and self-pleading of specialized accrediting groups. And there were skeptics who believed credible self-regulation was a delusion. They argued that quality assurance needed to come from an independent group outside the academy, such as the federal government or an independent organization dedicated to that purpose.

The only concrete decision coming out of the Summit was to call a timeout and appoint a “Presidents Work Group on Accreditation” charged with pondering the future and recommending a way forward. It worked for the better part of a year and focused on three central questions:

Does accreditation matter?

How well is the current system functioning?

And, is a central body, such as COPA or the present CHEA, needed?

The conclusion was that accreditation mattered a great deal. First and foremost, it mattered to campuses themselves. It mattered for the very reasons that led to the creation of accreditation more than a century ago. “What is a college?” What is credible academic work? These age-old questions were seen as no less relevant today. Distance learning was in its early years and expanding. Institutional forms were changing, including the expansion of for-profit entities. The

culture of campuses was changing. And diploma mills remained a harsh reality. Bottom line, credible quality assurance in higher education was seen as more important than ever.

The work group also united around one other conviction: acknowledging the several shortcomings of the system of *self*-regulation, the work group was unanimous in the belief that judgments of academic quality are better made by the academic community than by government.

To sustain the current system, however, the work group concluded that significant improvement of accreditation was needed, including stronger central leadership through a group like CHEA, directly accountable to the academic community, charged with carrying out the recognition function, the analysis of accreditation issues, orchestrating the national dialogue, and serving as an advocate for voluntary academic self-regulation.

Over the last decade my sense is that the level of confidence in accreditation within the academic community has grown. In spite of the strains of the most recent reauthorization, accreditation – as a community – made strides. We no longer face an immediate crisis of confidence. Still, the enterprise remains vulnerable. Knowledge of and support for accreditation remains a mile wide but an inch deep.

Within this as context, “*Where should we take accreditation?*” What can be done to strengthen the capacity of accreditation to serve the needs of institutions and the society? Where is the road map?

Learning Outcome Assessment and Accreditation

The most powerful opportunity for the accreditation community is to move farther in the direction of evidence-based, learning-outcome-centered accreditation. The idea of using evidence of student learning outcomes and student achievement for accreditation processes and decisions seems obvious. And yet, when accreditation’s credibility is challenged, the focus turns to the quality of evidence on which judgments were made.

Accrediting groups – regional, specialized and others – have led the way in embedding the assessment of student learning outcomes and the constructive use of outcome data in the culture of academic institutions and programs. The Western Association of Schools and Colleges, for example, has asked that campuses make a commitment “to educational effectiveness...” and put in place “a system for collecting and using evidence in a variety of ways to improve student learning.” (Richard Winn, Western Association of Schools and Colleges, 2008 Assessment Institute)

Fields such as engineering have pushed the articulation and documentation of learning outcomes, and assessment has become central to the process of accreditation. CHEA offers an annual award to recognize and honor best practice in learning outcome assessment.

Still, the link between student learning outcome assessment and accreditation can be stronger and can strengthen materially the credibility and integrity of higher education accreditation.

Working with George Kuh from Indiana University, and with the support of foundations and encouragement from several higher education associations, we have launched the National Institute for Learning Outcome Assessment to help institutions as they devote more attention and resources to the assessment of student learning outcomes. We believe the next three to five years present a real opportunity for the community to come together, not only to support the concept of learning outcome assessment, but to embed the culture of continuous improvement and evidence-based decision making on campuses.

For our part, we want to provide a clearer picture of the changing assessment landscape. We plan to do an annual survey of campus assessment efforts, talk with key players, track assessment on institutional Websites, conduct case studies of best practice and commission working papers helpful to institutions as they confront the philosophical and practical challenges of assessing student learning.

Accreditation has an opportunity to take the lead in shaping the future of learning outcome assessment. As we have examined institutional websites, for example, the most common

mention of learning outcome assessment tends to occur in connection with accreditation. Countless academic programs and campuses have not thought seriously about the challenge of learning outcome assessment outside the context of accreditation. As a result, there is both an opportunity and perhaps an obligation for the accreditation community to play a key role in leading and shaping the assessment movement.

The practical obstacles to embedding learning outcome assessment and continuous quality improvement on campuses are many. Some campuses reject the notion outright, seeing outcome assessment as both impossible and unnecessary. Others may be open to the challenge of assessment but have no clear view of what might be assessed, how it might be done, how the results would be used, or how the impact of any changes made as a result of assessment evidence would be examined.

Closely related to the practical challenges of learning outcome assessment are the broader issues of transparency and accountability. In a recent gathering of academics from around the country a question was posed: How many of you see a tension between assessment for purposes of improvement and assessment for reasons of accountability? Virtually every hand in the room went up.

Tensions between assessment for improvement and assessment for purposes of accountability are real. And yet those two strands come together in accreditation. Accreditation must be committed at its core to institutional improvement, but accreditation must also be a transparent and credible process accountable to institutions and society for quality assurance. Reconciliation of these legitimate but sometimes competing demands is crucial.

The daunting challenges of learning outcome assessment have been on the higher education agenda for more than 20 years. Several higher education associations have contributed to the movement, including AAHE, AAC&U, CIC and others. More recently, the presidential associations have placed assessment on their agendas, and the prospect of progress appears real. Still, the enterprise remains in its infancy. No single step would add more to the credibility of

accreditation than for the community to embrace and shape the future of learning outcome assessment and embed it more completely in accreditation standards, processes and decisions.

Rethinking The Process

The second opportunity I see to strengthen credibility is to rethink process. Much of accreditation has been inherited, passed from one generation of academics to the next. Given the magnitude of the changes that have taken place in society as well on campuses, we should ask: Is there an opportunity to rethink the processes of accreditation, to make them less burdensome and more useful and productive?

One aspect of accreditation that causes it to seem burdensome is the concentration of 10 years' work in a few months of frantic preparation. The accreditation file is pulled from the back of the drawer, participants from the last round of accreditation are consulted, a committee is appointed, perhaps staff is designated, and work begins on a new cycle. Once completed, accreditation moves off the agenda and to the back of the file for the next 10 years.

Is it possible to envision a cycle of continuous accreditation and quality assurance tied to institutional processes and data systems, with relevant information updated in real time? Might such a system replace the need for the traditional self-study? Could the nature of the site visit be reshaped to become simply an audit and verification of systems of internal academic quality control?

The American Association of State Colleges and Universities and the National Association of State Universities and Land Grant Colleges have developed the Voluntary System of Accountability – the VSA – to provide a template for institutions to make transparent a wide range of information, including information related to student learning outcome assessment. Why not augment those data with requirements for accreditation in ways that enhance transparency, simplify the job for institutions, and make accreditation a continuous process rather than a once-in-a-decade event?

Peter Ewell, in his analysis of the future of quality assurance in higher education, notes the familiar “look and feel” of accreditation--the “self-study verified by peer review on a periodic schedule leading to formal recognition of ‘accredited’ status by an established commission.” Challenging, let alone changing, that familiar “look and feel” will be difficult. There is a certain comfort in the ritual or the “look and feel” of accreditation. Reworking the process of accreditation, however, and defining its essential elements, making it more continuous, more transparent and productive, will also enhance its credibility.

Protecting the Core Purposes

The third possibility is both an opportunity and a challenge; protecting the core purposes and integrity of accreditation. Voluntary accreditation has never been fully voluntary. For academic programs, accreditation defines legitimacy. For institutions, the link of accreditation to eligibility for federal financial aid and other federal funds makes accreditation a virtual requirement.

As a result, accreditation is one of the few levers available to mandate change on college campuses. The temptation to misuse this power and the resulting tension is most obvious in accreditation’s interface with the federal government. As administrations and political philosophies and ideologies change, accreditation gets buffeted, causing some to ask, wouldn’t it just be better to eliminate the temptation, to take away this powerful lever for change, and simply decouple the linkage between accreditation and federal funds?

The reality, of course, is that the federal government has a legitimate need for a system of quality assurance in higher education. Still, it can be argued that the obvious need of government can best be met by the academic community itself. Certainly, the creation of a federal FDA for higher education has not been an appealing prospect for many.

I believe we need to cope with the temptation accreditation presents to those who would misuse it and not walk away from it. The struggle to protect the integrity of the system is a price to be paid. When the core academic purposes of accreditation are met, the needs of government and

others will be well served also. But, when the system is misused, it diminishes the credibility of accreditation both on campus and in society.

The path, I believe, is to define clearly the core values and purposes of accreditation and resist those who would misuse the power of accreditation for unrelated purposes.

Building Community

An additional opportunity to enhance the credibility of accreditation is to strengthen the sense of cooperation and cohesion within the community. Accreditation in the United States reflects the unique character and incredible scale and diversity of the academic community it serves. With over 80 accrediting organizations of different types, missions and traditions, and even with a central body to bring these disparate elements together, achieving consensus is difficult.

Diversity of thought and competing proposals are healthy. Lock-step adherence to a common view, especially in an academic culture, is as undesirable as it is unachievable. And yet, the absence of a shared (even if fragile) consensus and the lack of a common voice for accreditation can breed confusion and undermine credibility.

Moreover, the accreditation community, as far-flung and diverse as it is, must interface and join in common cause with other segments of the broader academic community – ACE and other presidential associations and the Washington Higher Education Secretariat, for example. When accreditation is seen by the larger community as having difficulty reaching consensus, it undermines credibility and makes accreditation vulnerable to solutions imposed by others.

Those who have worked in complex academic institutions where sense of community and cohesion are crucial to effective functioning know how difficult the task can be. Interests diverge. Trust and common cause do not come easily but must be nurtured. Even with the best of care, the sense of community is never complete. Trust is never unlimited. And agreement is never final. And therefore the struggle to achieve a common view is ongoing. Without it, however, credibility is at risk.

Taking Self-Regulation Seriously

One final possibility deserves mention. While American higher education jealously guards the prerogative of reaching its own judgments of academic quality, it often fails to take the responsibility seriously. The challenge of quality assurance often fails to find a prominent place on the agenda of faculties, presidents and governing boards. Accrediting organizations, given the magnitude of their assignments, are often understaffed and under-resourced. The level of knowledge about accreditation outside of the academy is minimal, but even on campus, understanding of and engagement with accreditation is far less than it should and could be.

In short, while we cherish the right of self-regulation, we tend to shortchange the necessary commitment of time, attention and resources essential to make the system credible and sustainable. If self-regulation is to work, the academic community must take the responsibility seriously – seriously in terms of attention, seriously in terms of standards and expectations, seriously in terms of the quality of the evidence and processes used in reaching decisions, and seriously in terms of the level of resources committed to the enterprise. Failing that, accreditation will continue to live on the edge, never quite gaining the credibility it seeks and needs on campus and beyond.

Accreditation and Change

Where does this leave us? Where do we take accreditation? I will leave the final answer to your table discussion.

Still, we can approach the challenge with confidence. History is encouraging. We have witnessed incredible change in American higher education over the decades. Megatrends have transformed the enterprise. Institutions have become larger and more complex. We are more varied and diverse in terms of mission, program, character and in virtually every dimension. The financing of higher education has changed profoundly and even now is shifting in unpredictable and threatening ways. The nature and culture of campuses themselves have changed. While the administrative apparatus has grown, the capacity of academic leaders to bring about change appears diminished. Institutions are more subject to market forces as they struggle with image,

rankings, enrollment management and the bottom line. Distance learning and technology have changed the way faculty members and students go about their work.

And yet, amidst all the change, the challenge of accreditation in some ways remains the same. “What is a college?” What academic work should be accepted for transfer? What do students know and what can they do? Is this the right college for my son or daughter? Does this enterprise have quality and integrity?

Accreditation has the capacity to change in response to changing circumstances and the question “Where do we take accreditation?” is the right question. I have suggested some possible directions: strengthening the link with learning outcome assessment; streamlining the process of accreditation to make it continuous and more useful to those who depend on it; protecting accreditation from those who would misuse it; strengthening our sense of community; and making the commitment of institutional attention and resources required to sustain the credibility and integrity of the enterprise.

All of that and more I am confident we can do.

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