



The *CHEA Initiative* 2008-2010: The First Two Years

Participants Speak Out: The Future of Accreditation

September 2010

This second report on the CHEA Initiative focuses on what CHEA has heard from many constituents, especially during visits with 21 accrediting commissions and five CEO/CAO Roundtables during April 2009–June 2010. CHEA's goal for 2010-11 is to build on these many conversations to develop consensus-driven action plans on the issues that constituents have identified as vital to the future of accreditation.

INTRODUCTION

In Fall 2008, the Council for Higher Education Accreditation (CHEA) launched the *CHEA Initiative*, a multi-year national conversation on the future of accreditation. The *Initiative* seeks to (1) enhance accountability in accreditation and (2) sustain a balance and distinction between accountability to the federal government and the academic work of accreditation – its focus on institutional mission and independence, peer/professional review and quality improvement. Through the *Initiative*, CHEA is working to build a consensus for action on the issues of greatest importance to the accreditation and higher education communities, as well as prepare for the anticipated reauthorization of the Higher Education Act in 2013 or thereafter.

CHEA spent the first year (2008-09) of the *Initiative* reaching out to member institutions, accrediting organizations, government and the public. This outreach surfaced six major issues: advocacy for accreditation, its relationship with federal government, accreditation and accountability, its relationship with state government, the relationship between institutions and accreditation and relationships among accreditors. During the second year (2009-10) of the *Initiative*, CHEA conducted a number of additional meetings to learn the views of colleagues across the country, focusing on the six issues.

In all, during the first two years of this work, CHEA hosted 5 CEO/CAO Roundtables with member institutions, met with 21 accrediting commissions, held 5 National Accreditation Fora and conducted one student focus group for a total of 32 meetings – an unprecedented national dialogue on accreditation with some 1,500 colleagues around the country. The roundtables and commission meetings took CHEA to 11 states during this time, including multiple visits to a number of states, as well as its work in the District of Columbia where CHEA is headquartered. The student focus group was held in Washington, DC.

Most discussions began with participants speaking to the benefits and value of accreditation. At the same time, they expressed interest in some change to accreditation policy and practice. For the most part, the interest was in incremental alterations over time. Many participants pointed to the importance of accreditation in responding effectively to the current societal emphasis on access and accountability for student success, on expanding the role of faculty and assuring that peer/professional review remains effective and efficient. There was little interest in any dramatic departure from current practice, e.g., eliminating federal review or the gatekeeping connection with government, rethinking the current structure of regional accreditation or realigning programmatic accreditation in

some way. Beyond this, the conversations reflect varying and sometimes inconsistent points of view.

The conversation about accreditation changed during the latter half of the second year of the *Initiative*. Higher education and accreditation began to feel the impact of the 2008 Higher Education Opportunity Act, resulting in a heightened sense of urgency from government especially with regard to accountability from accreditation. These changes in federal law, accompanied by additional rules developed during negotiated rulemaking, intensified the pressure on accreditation and, consequently, the institutions and programs that are accredited. As a result, participants raised more and more serious concerns about the expectations of the federal government and the role of accrediting organizations in carrying these out. And, increasingly, participants expressed frustration about what was expected of them.

What follows is a description of participants speaking out: their thoughts and reflections that emerged especially in the roundtable and commission discussions held during the first two years. It includes information about the student focus group.

PARTICIPANTS SPEAK OUT: THE SIX ISSUES

Advocacy for Accreditation

From the participants:

- “We need an ‘affirmative defense of accreditation.’”
- “We need to make the case for self-regulation and the role of mission.”
- “Prove accreditation works to keep government away.”
- “Accreditation must speak with a ‘clear unequivocal voice.’”

Colleagues attending these various meetings made their strong advocacy for accreditation immediately clear. Accreditation is highly valued. It is often described as key to quality improvement. It is valued because it provides access to highly beneficial peer review that assists institutions and programs as they seek to enhance their service to students.

At the same time, participants pointed to the need for even greater advocacy for the value and importance of accreditation to constituents outside higher education – states, government officials generally, business, prospective students and the public. Participants, over and over again, stressed that the public lacked adequate understanding of the fundamental value of peer review and its contribution

to the richness of the educational experience for students. Accreditation plays a pivotal role in establishing a climate of trust within higher education and between higher education and its various external constituencies.

This call for advocacy both to inform and encourage confidence and trust emerged frequently and sometimes fervently in the various meetings. The public needs to know the extent of what accreditation does and its thoroughness and depth of scrutiny. The public needs to be convinced of the worth of accreditation. Participants want accreditation to garner greater respect.

Colleagues called for stronger voices from colleges, universities and accreditors, with more reaching out to improve the public image of accreditation. During the meetings held in 2010 (in contrast to 2009), participants also expressed concern that the description of the worth of accreditation was, increasingly, no longer in the hands of institutions or accreditors and that this needed to change.

Accreditation-Federal Government Relationship

From the participants:

- “Every time we get additional rules, we become less effective as accreditors.”
- “We need to come to a decision about what accreditation’s relationship with government is.”
- “Peer review keeps us on track, instead of the government doing this.”
- “The most significant element in the federal relationship is broken trust.”
- “Accreditation seems to have ‘given up...and given in to focus of [federal] power.’”
- “Accreditation isn’t about ‘the federal government made me do it.’”
- “Don’t ever say to faculty: ‘You have to do this because of accreditation.’”
- “Don’t invite government oversight. It’s about us.”

Participants frequently expressed apprehension that the federal government is going too far in its accountability expectations and, by doing so, is undermining accreditation and academic self-determination. While seeking to maintain the gatekeeping relationship with government, colleagues nonetheless repeatedly asked: “How do we protect institutional autonomy, quality improvement and academic freedom?” Their apprehension had two dimensions:

- A worry about the reach of government and increased federal oversight, especially in the

academic arena, that was both unwelcome and likely to diminish what is perhaps accreditation's greatest asset: its capacity for quality improvement through peer review. The community, in contrast to government, is to decide core standards and expectations in the context of mission. Accountability is important, but quality and quality improvement must be taken into account when addressing it.

it would be inappropriate to ignore government expectations, participants were concerned about what they perceived to be acceptance of expanded government oversight, using this to justify accreditation actions. Government should expect – not prescribe – accountability.

Accreditation and Accountability

From the participants:

- “It’s vital that we keep accreditation voluntary.”
- “What is going on at the bottom?”
- “We are tough on each other.”
- “We need accreditation to be about helping students. What is essential/critical to assist them?”
- “What are we giving up to do accreditation?”
- “We need more nuance in accreditation.”
- “Accountability is becoming an industry.”

Participants repeatedly noted that accreditation is about quality and not only accountability. They expressed concern that creativity would be stifled in the name of accountability. Colleagues acknowledged that while there are many accountability efforts underway, more needs to be done. But there was little agreement in the meetings about what is to be done and how. Participants stressed the extent to which funding affects quality, a point that is often overlooked, even in the current difficult financial environment. Some colleagues emphasized that accreditation needed to raise the bar of threshold standards as part of accreditation gaining additional credibility. They saw this effort as part of accreditation’s responsibility to serve the public interest.

Student learning outcomes were a major focus of the accountability discussions. Many participants see their institutions as already fully engaged in major efforts to develop evidence of student achievement and use this evidence for both accountability and improvement. Some view accreditation as duplicative of current efforts, unnecessarily time-consuming and, in some instances, reflecting an undervaluing of the established quality of institutions and program.

Both the variation of opinion on what to do about accountability and the focus on student learning outcomes spilled over into discussions of accreditation process, with some questioning whether accreditation was going too far in expectations here. Yet others indicated that colleges, universities and accreditors do too much accountability

Student Voices

From the students:

- “Accreditation is the highest, it’s the gold star for an institution...it implies an outside source of judgment.”
- “Accreditation is an umbrella standard to live up to set by peers.”
- “Accreditation can affect the value of your degree.”
- “Accreditation helps the deans help students.”

The student focus group that met in Washington involved five current or former students who had at least some experience with accreditation. The students were not asked to address the six issues that drove the roundtable and commission discussions, but focused on a broader set of questions about the role of accreditation. In general, students said that accreditation led to appropriate curricula and faculty, as well as institutional self-reflection to assure that its offerings were current. For the most part, the students identified accreditation with accountability and maintaining high standards. Accredited institutions help students to reach their goals.

The students indicated that there is a significant gap between the value of accreditation and student awareness of the review. They suggested that institutions take additional steps to inform students that a college, university or program is accredited and what this means.

- A worry, emerging from both institutions and accreditors in the second year of the *Initiative*, that accreditation was too strongly influenced by government authority. While acknowledging that

themselves. And others called for differentiation of levels of accreditation instead of the same characterization “accredited” for all successful institutions and programs. A tiered system might be more informative to the community and the public.

Accreditation and State Government

From the participants:

- “States act as if accreditation doesn’t exist.”
- “Students are penalized if they move from one state to another.”

When participants focused on state relationships, they spoke to three specific topics. The first was transfer of credit and the perception on the part of some that accreditation was a barrier and inhibited student mobility, especially efforts to move from schools accredited by national career-related accreditors to regionally accredited schools. Transfer came up in virtually all meetings and not only in relation to state government, especially the issue of how students might be harmed.

The second topic was parity at the state level for institutions and programs accredited by different types of accreditors, e.g., regional, national career-related and national faith-related accrediting organizations and their recognition. Some state law and regulation place limitations on institutions and programs that may operate within a state based on either the type of accreditation or the recognition of the accreditor (CHEA or the U.S. Department of Education, USDE). These restrictions can limit student access and attainment. Concerns were also expressed that state licensure can drive standards for some programmatic accreditors. This creates problems for students who need to be mobile across states to pursue a profession.

The third topic was confusion, with participants claiming that both states and accreditors made many demands that were at times in conflict, at times duplicative and at times too prescriptive. This slows things down and is not helpful to students. Across states, students have difficulty with variation in certification requirements for employment as well as licensure, forcing them to take additional coursework. As indicated above, there was discussion about the need to make the case for the value of accreditation especially to the states.

Relationship Between Institutions and Accreditors

From the participants:

- “Peer review is vital, even if we have problems with it – and we do.”
- “Accreditation is both a burden and insightful.”
- “Accreditation is our best friend – in spite of what is happening with outcomes.”
- “Can we have a small-college version of regional accreditation?”
- “Accreditation is validating that we are doing what we are supposed to do.”
- “‘We’re protecting you from the federal government’ is the approach.”

As indicated above, there were many comments on how accreditation was helpful and that the type of review that accreditation provides is not available anywhere else. Accreditation is found to be very useful when there is a new institutional administration; it helps establish a culture. Accreditation provides a framework for working with faculty and student services. Programmatic accreditation is particularly helpful when working with employers. Accreditation assists with strategic planning. Accreditation encourages institutions to define success on their own and publicly present evidence of this success. It offers a major opportunity for cooperative efforts.

Participants, when addressing this relationship, called for more faculty engagement in accreditation. They called for greater uniformity of practice within accrediting organizations. They also spoke to the desirability of common expectations of what a degree means. In the minds of some, accreditation needs to work for greater economies of scale with colleagues indicating that they are “consumed” by accreditation, with time and other resources diverted from the vital task of serving students.

During the last several months of discussion, some participants also indicated concern that accreditation was less collegial than in the past and more focused on enforcement of standards in a way that involved more prescriptive behavior. The cost of undergoing a review and complying with expectations of accreditors started emerging as a factor as well, with comments about the investment of money and resources in accreditation review and compliance in the face of ongoing and sometimes

severe budget cuts. Worry was expressed that institutions are experiencing, as one participant put it, “accreditation creep”: more and more prescriptive demands as the key way to meet accreditation standards.

The Relationship Among Accreditors

From the participants:

- *“Can regional accreditation and programmatic accreditation work together? We provide the same information many times and in many different ways.”*
- *“Can we have at least some alignment among the regionals? It doesn’t seem fair.”*
- *“We need to clarify the landscape of accreditation.”*
- *“Accrediting organizations need to be more courageous.”*

There were calls for greater cooperation and commonality among various accrediting organizations in order to, e.g., assist institutions and programs in data collection. This included calls to reduce the perceived burden of multiple accreditations, involving what were viewed as inconsistent demands on institutions from various accreditors. It also included calls for a regional-national accreditor dialogue. On the one hand, there were calls for accreditation to be additionally responsive to the types of institution under review. On the other hand, as faculty and administrators are more and more mobile, there are calls for greater similarity among especially regional accreditors.

Some participants pointed out that distinctions related to types of accreditation can have deleterious consequences. Federal recognition is not enough to assure quality and engender trust among the types of accreditation. There is a divide between regional and other types of institutional accreditation, especially between nonprofit and for-profit institutions and accreditors. This last produced considerable conversation, with expressions of concern that students in institutions or programs that are accredited by organizations recognized by USDE or CHEA should be treated similarly. This view was voiced from the national faith-related sector as well. Concern with transfer of credit was expressed here, in addition to the state discussion (above). Other issues emerged. What is institutional accreditation’s role in oversight of graduate education? Do regional accreditors need “secondary standards” for specific programs for which there are no accreditors, e.g., adult education?

PARTICIPANTS SPEAK OUT: INTERNATIONAL ACTIVITY AND FOR-PROFIT HIGHER EDUCATION

Two additional issues emerged during the course of the two years of discussion: the international activity of institutions and programs and accreditation and the growth and impact of for-profit higher education and accreditation.

International Activity

The discussion of international activity centered on the expansion of offerings by many colleges and universities, whether building campuses or offering programs or entering into business relationships with non-U.S. colleges and universities. It also included building capacity within accrediting organizations, seeking to support schools engaged in international work. A number of accreditors called for sharing ideas and effective practices, with colleagues asking “What is common internationally?” and “How do we think through accrediting internationally?” Some fields may need international standards and others may not. Values are at stake in countries where key features of U.S. higher education – e.g., U.S.-style institutional autonomy, academic freedom or commitment to mission – may not be present in the same manner as in the United States, yet these are the features on which U.S. accreditation is based. Some spoke to degree mills and accreditation mills as requiring international attention. There were calls for more U.S. dialogue on international quality assurance generally, given the prominence of this issue in the last ten years.

For-profit Sector

Participants often spoke to the divide between for-profit and nonprofit higher education and the need to diminish this gap through working together and mutual respect. The two sectors often differ with regard to business models, governance, approaches to curriculum, approaches to faculty and marketing and recruitment. Transfer of credit emerged as a particularly divisive issue between for-profits and nonprofits.

At the heart of each of these concerns was expression, over and over, of the more limited acceptance of for-profit higher education as compared to nonprofit institutions and programs. In some instances, this takes the form of strong opposition to for-profit institutions from nonprofits, in contrast to the sectors working together.

On the other hand, a number of colleagues pointed to the growing extent to which for-profit institutions are regionally accredited. Some noted that, in spite of their differences, the two sectors are growing in similarity, with more baccalaureate, master's and doctoral-level programs in the for-profit sector and expanding emphasis on marketing and recruitment in the nonprofit sector, as well as greater presence for regional accreditation.

WHERE DO WE GO FROM HERE?

For the third year of the *Initiative*, the focus shifts to action. CHEA will host national accreditation fora during which invited participants will review the national

conversation to date and begin to frame action plans based on what has been learned. This will also assist with preparation for the next reauthorization of the Higher Education Act. These meetings will focus not only on the initial six issues, but also on international activity and for-profit higher education. Participants will include institutional leaders, accreditors, students, government, foundations and the press. The meetings will be successful if they result in action plans through which accreditors, institutions and programs work together to frame the future of accreditation.

At a Glance: the CHEA Initiative Issues and the Future of Accreditation

- **Advocacy for accreditation:** *Accreditation is highly valued in the academic community. There is a need for even greater advocacy to sustain its respect and credibility, especially with government and the public.*
- **Accreditation's relationship with the federal government:** *There is growing worry that the federal government is taking on academic issues and using accrediting organizations for this purpose, in contrast to turning to institutions to provide this leadership.*
- **Accreditation and accountability:** *There is agreement that accreditors, institutions and programs have done a great deal – but, at the same time, more needs to be done. There is little consensus about what counts as successful accountability for all of higher education.*
- **Accreditation's relationship with state governments:** *There is a perceived need to sort out the relationship between states and accrediting organizations and to achieve parity among types of accreditors as this relates to transfer of credit, licensure of schools and licensure of students.*
- **The relationship between institutions and accrediting organizations:** *Accreditation is viewed as both valuable and burdensome, with the student achievement issue looming large. There is a need to enhance shared understanding about the evolving role of accreditation.*
- **The relationships among accreditors:** *There are calls for more trust and sharing, more attention to effective practices and more working together.*

Regarding the two additional issues that have emerged during the CHEA Initiative's discussions:

- **International activity:** *Many colleges and universities have expanded their international offerings, accompanied by additional scrutiny from accrediting organizations. Accreditors spoke to the desirability of sharing ideas and effective practices for accrediting internationally. There are calls for a single set of international standards for some fields.*
- **The growth of the for-profit sector:** *As for-profit higher education continues to expand, there is a need to understand similarities and differences between this sector and nonprofit higher education. Considerable tension between the two sectors remains, indicating a need to examine this relationship.*

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