Accreditation is the primary means of assuring and improving academic quality in US higher education. Accreditors use a self-regulatory, collegial, formative review of institutions and programs by academic peers to perform several vital roles. Historically, these have always included an affirmation of threshold quality and guidance about strengthening academic performance.

Then, some 60 years ago, accrediting organizations—as reliable authorities on academic quality—agreed to serve as gatekeepers for the federal government: Accredited status became a requirement for institutions or programs to be eligible for federal funds for student financial aid, research, or programs—today amounting to $175 billion per year. Over time, the federal government has developed a myriad of requirements, spelled out in law and regulation, that accreditors must meet to be approved to play this role (a process known as “recognition”).

The gatekeeping role and the relationship with the federal government now dominate the world of accreditation. Do we want accreditation to continue to perform the gatekeeper function? If accreditation does not, what entity would or should? How does the work of accreditation—including gatekeeping—affect colleges and universities through its impact on their governing boards? What is the effect of accreditation, including gatekeeping, on the key values that have been central to US higher education since its inception?

**Gatekeeping by Accreditors**

Accreditation, even with its federal role, remains owned, funded, and managed by colleges and universities.

Presidents, chief academic officers, and faculty make the crucial decisions regarding accreditation standards, policies, and procedures; whether accredited status should be awarded or denied; and how their organizations operate. By doing quality review themselves rather than leaving it to government officials, college and university leaders believe that they have effectively substituted self-regulation for government regulation and protected themselves against political interference.

Support for maintaining the gatekeeping role has been a constant among the large majority of accrediting organizations, federally recognized or not. Not just academics but accreditors point out that reviewing and making judgments about the quality of higher education is a complex task that only academic professionals can do knowledgeably. Supporters also value the collegial dimension of accreditation, with reviews that are essentially formative and focused on quality improvement.

Those who do not want accreditors to be gatekeepers are mostly to be found outside the accreditation and academic communities. They include observers of accreditation in the policy community, in think tanks, and in the press. These observers focus on what they consider to be defects of the peer-review process on which accreditation relies heavily.

They argue that the process is not adequately rigorous and that peers cannot avoid conflicts of interest because they are more invested in protecting each other than in offering the harsh judgments about academic quality that may sometimes be needed. They claim that peer review provides neither accountability nor consumer protection.

Critics also point to the extensive governmental authority given to accreditors and assert that these nongovernmental organizations are not adequately scrutinized or answerable to government or the public for exercising this authority. Finally, some observers see accreditation as a vehicle to ensure that colleges and universities promote certain types of political thought or social values. Speech codes are one example the critics point to, as is the documented preference in academe for liberal or progressive causes.

Is it best that accreditors continue to be gatekeepers? Accreditors want to play this role, and academics and the federal government want them to. The issue is not so much whether accreditation continues to do gatekeeping, at least in the near term, but about the growing impact of the gatekeeping role on accreditors’ practices and values. As the federal government’s regulation of accreditation expands, its emphasis on compliance grows, and its engagement in
These leaders believe that even if accreditors are playing their role in a way that the leaders do not like, accreditors are preferable to other possible gatekeepers.

the academic decision-making of colleges and universities increases, how can the collegial, peer-driven, and self-regulatory core of accreditation remain robust and intact?

Proponents of gatekeeping want these features of accreditation to be sustained, along with gatekeeping. Critics of accreditors as gatekeepers see these features as incompatible. For both parties, the debate about accreditation’s gatekeeping role comes down to three questions: Can self-regulation and government regulation not only co-exist but be productive? Can effective peer review co-exist with ever-expanding government review? Can the collegial approach at the heart of accreditation be reconciled with government demands that accreditation function primarily as a form of compliance?

**Gatekeeping by Others**

Some of accreditation’s critics recommend that other parties take on the gatekeeping role. When asked who those others might be, they typically suggest the federal government—but some have nominated the states or yet-to-be created private-sector organizations outside of higher education.

Recommendations that gatekeeping be done by others is generally driven by a desire that higher education provide more frequent, useful, and concrete evidence of effective performance, be more transparent, and offer greater consumer protection. This means more emphasis on measurable performance indicators such as graduation rates, employment, and evidence of student learning.

The critics also recommend triggers or levels of college and university performance that, if not met, would result in a denial of federal funds—as well as more energetic monitoring of institutions to assure compliance with laws and regulations governing the use of student financial aid and other federal money. Finally, they think that more and better information about college performance should be provided to the public.

Those who think that it is a bad idea for others to take on gatekeeping are mainly to be found in the academic and accreditation communities. Some accreditation leaders are convinced that accreditation itself would go by the wayside if they lost the gatekeeping function—that institutions and programs would abandon accreditation over time.

Many college and university leaders do not want to see others as gatekeepers, even as accreditors are forced to play a larger and larger compliance role, are progressively more controlled by the federal government, and increasingly serve as conduits for greater government oversight of colleges and universities. These leaders believe that even if accreditors are playing their role in a way that the leaders do not like, accreditors are preferable to other possible gatekeepers.

As long as gatekeeping involves judgments about academic quality, removing it from accreditors is not a good idea. However, if gatekeeping increasingly shifts from academic considerations to a compliance review with a small set of performance indicators established by the federal government and having little to do with academic quality (such as those suggested by the proposed College Ratings System), it may no longer matter who does the gatekeeping. The gatekeeping role will have been fundamentally transformed.

**Does Accreditation Challenge Governing Boards?**

Accreditors have always challenged governing boards—there is a structural tension built into the relationship between the two. The key question is whether accreditation is done in a way that supports institutional autonomy and enhances the role of governing boards or if it undermines the responsible independence of institutions and the leadership roles of boards of trustees.

Throughout the history of accreditation, the tension has been manageable, even productive. Typically, accreditation both builds upon and reinforces institutional autonomy through attention to institutional mission, the driving force in the evaluation of colleges and universities. At the same time, accreditation standards are applied across all institutions, whatever the mission, and, intended or not, drive sameness in institutional direction and performance.

Accreditors have standards about fiduciary responsibility and stewardship that is both financial and academic, about the relationship between boards and institutional executives that hold the latter accountable but do not result in micromanagement by boards, and about the commitment to shared governance. All of this has historically been compatible with the values that boards themselves and the governing-board literature have espoused.

However, both the climate in which governing boards currently operate and the practices of accreditation have changed, especially over the past ten years. These changes have sometimes put accreditors and governing boards at odds with each other. Some controversial examples include the University of Virginia’s Board of Visitors’ efforts in 2012 to remove its president, as well as the actions of the Pennsylvania State University Board of Trustees in relation to the Sandusky case.

Perhaps of greatest significance is the fact that accreditors are playing a larger role in major business decisions of colleges and universities, making judgments that can
Institutional mission and autonomy are undermined by federal and other efforts to measure colleges and universities with the same yardstick..., independent of the institutional differences captured by mission.

trigger consternation from governing boards. The institutional accreditor for the Frank Lloyd Wright School of Architecture has a standard that requires the school to become legally separate from its parent foundation or lose its accreditation in several years. To date, the board of the foundation has voted to give up accreditation.

Other examples include, in 2013, the Thunderbird School of Global Management’s proposed joint venture with Laureate Education, Inc., which did not receive approval from its institutional accreditor. Tiffin University in Ohio established a partnership with Ivy Bridge College that was not approved by its accreditor. Who is ultimately responsible here, governing boards or the accreditors?

Accreditation’s Impact on the Key Values of Higher Education

Accreditation is built upon four key values of higher education: the responsibility of academic peers to determine quality; the commitment to mission as essential to maintaining the diversity of higher education; institutional autonomy as a necessary foundation for academic leadership of colleges and universities; and academic freedom as central to effective teaching, learning, and research.

Conditions that have supported these values have deteriorated considerably in the last several years. The use of peer review is routinely criticized. Institutional mission and autonomy are undermined by federal and other efforts to measure colleges and universities with the same yardstick (e.g., graduation and transfer rates, affordability, access), independent of the institutional differences captured by mission. The current debate about academic freedom, although largely independent of accreditation, has raised questions about the role of accreditation in supporting and sustaining this vital value.

Accreditation itself has not produced this climate change. Current conditions are due to a confluence of forces that include public distrust of social institutions and authority in general. Nonetheless, accreditors, working with institutions, need to push back.

They need to resist the shift from depending on academics to judge quality to asking non-academics to play this key role. This can be done, in part, by a focus on greater rigor in peer review. And accreditors and academics need to ensure that ratings systems, rankings, dashboards, and scorecards are sensitive to institutional mission. Everyone in the academic community needs to support institutional autonomy as the foundation for strong academic leadership. Finally, there is a growing need for accreditors to further engage in the national discussion of academic freedom.

When taking on the gatekeeping role, accreditors agreed to carry out collegial reviews of colleges and universities and inform government of the results, not to become compliance officers for federal laws and regulations or to surrender fundamental practices such as peer review or fundamental responsibilities such as judging academic quality. If gatekeeping is reduced to a compliance checklist largely irrelevant to academic quality but forcing accreditors to abandon their collegiality, commitment to peer review, and the formative evaluation that is essential to quality improvement, gatekeeping is not worth retaining.

Finally, accreditors need to push back against any actions that interfere with their commitment to the key values of peer review, institutional mission, institutional autonomy, and academic freedom. Boards of visitors, accreditors, and campus leaders have more that brings them together than divides them when it comes to the values that are central to higher education.