

**Council for
Higher Education
Accreditation**

Tasks for Higher Education Accreditation

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CHEA

Introduction

“...a modified accreditation system will prove the only vehicle available to adjust higher education to society’s new expectations.”

The elitist, liberal arts, ivory tower concept of higher education has given way to a new expectation: that of universal higher education, open to almost everyone and providing instruction in almost every subject. Traditional practices affecting the nature of a campus, patterns of student life, and forms of classroom interaction are giving way to revolutionary methods of teaching and learning. Higher education has emerged from its heritage as a private, primarily religious undertaking to a predominantly public enterprise.

The blunt reality is that some form of postsecondary education is the gateway to economic well-being for most Americans; its role is similar to that of secondary education just a generation ago. Unlike secondary education, which was perceived by many to be a community obligation, higher education was considered to be a voluntary compact between the student and the institution. Contemporary developments, however, place higher education in new social and economic relationships. As such, it is subject to a developing set of community obligations — not compulsory in fact but increasingly perceived to be so. We assume some semblance of consistency nationwide in elementary and secondary education, both of which are monitored by government. And though a college degree is an important achievement, its meaning and content are neither widely agreed upon nor closely monitored. Higher education is in a continuing state of reinvention.

The twenty-first century will dawn with more than 15 million students enrolled in colleges and universities and millions more pursuing other forms of postsecondary education. As the public’s financial investment in higher education grows and as higher education becomes increasingly universal and commonplace, state and federal agencies that monitor educational functions will demand increasing accountability from higher education and its accreditors.

If higher education is to minimize intrusive governmental demands similar to those imposed upon elementary and secondary education, it must be sensitive to its developing role. Through voluntary, collective action that assures the public and both state and national political leadership of acceptable standards of quality and accountability, the higher education community may be able to maintain the degree of independence that now distinguishes it on the world scene.

Within the accreditation community itself, modes of self-regulation are in dispute. This is a result of growing numbers of specialized accrediting bodies, dramatic changes in educational methodologies, and long-standing confusion over who is “in charge” of the accrediting system. The Council for Higher Education Accreditation (CHEA), established in 1996, is the newest organization charged with coordinating and rationalizing the accrediting community. These changes, coupled with extraordinary and unprecedented social developments, challenge the historic independence of the higher education community. It is no exaggeration to suggest that if self-regulation is to continue, a modified accreditation system will prove the only vehicle available to adjust higher education to society’s new expectations.

Higher Education and Government: The Regulatory Context

Economic regulation in the United States is based on the concept of a “business affected with a public interest,” a standard developed by the United States Supreme Court in 1876 to justify government regulation of certain sectors of the economy. The theory is that the public has the right to regulate the offering of a vital public service for the common good. Typically a license is required to offer services to the public, and the license may be withdrawn for cause. Both the public and all other licensed competitors are thereby protected from scams and charlatans. Permits are authorized by duly established agencies which provide a license or a “certificate of public convenience, interest, and necessity,” a concept that holds public welfare paramount.

Education, however, is both a public and a private enterprise. Thus, it resembles other significant functions, including public utilities (gas, water, electricity, transportation) which are operated by both private companies and by government, sometimes in competition. In some localities, government runs businesses usually considered private (e.g., liquor stores), while in other cases, government privatizes a function usually thought exclusive to government (e.g., prisons). Education in the United States is likely the most widely shared function among all levels of governments and among all forms of private institutions.

A useful term from the government lexicon is “government-sponsored enterprise” (GSE) to designate activities which, though government-sponsored, chartered, or supported, are given operational flexibility and control of their funds. The Postal Service and the Federal National Mortgage Association (Fannie Mae) are national examples; state GSEs include port and airport authorities,

and colleges and universities.

Private or public, when such vital services are involved, the government exercises considerable regulatory control. The more critical to health and welfare the product or service is (e.g., medicine, utilities), the more detailed the rules for production, advertising, consumption, and even price control. To minimize government control, the private sector may provide extensive self-regulation, as many professions and industries do and as higher education purports to do through voluntary accreditation. Yet the government oversight function remains.

Caveat emptor (let the buyer beware) and *caveat venditor* (let the seller beware) express the same idea. While economic regulation is controversial, we usually elect to control the producer and purveyor of critical goods rather than put the consumer at total risk. Is higher education a critical good affected with a public interest? If so, who should beware? Higher education is more critical to the public interest than ever before and the public has a right to expect, through accreditation, *caveat venditor*.

The lessons of the history of government and private or quasi-public relationships are clear. Any government subsidy to any enterprise, whether through direct grant or helpful legislation, results in increasing degrees of government supervision (with consequent intrusive bureaucracies and rules and regulations). Conversely, it results in increasing degrees of political participation by the beneficiaries of public largesse so as to assure continued and increased benevolence. Higher education associations and many major universities, like all politically involved interest groups, now employ lobbyists, public relations personnel, and moni-

tors of state and national legislative, executive, and judicial activities. Public money, ideology and politics are inseparable. Indeed, politics is about the allocation of financial resources to satisfy personal interests and ideological values.

Educators like to pretend (and many really believe) that politics and education do not and should not mix. For example, the tradition of independent school districts for elementary and secondary schools (and in some cases, community colleges) is rooted in the belief that schools should not be tied financially or politically to regular city or county units. Hence, school districts have been established with elected boards that have their own power to tax and spend. The result is additional units of government (presently comprising 18 percent of local government units in the United States and accounting for 40 percent of local government expenditures).

The increasing growth of public higher education puts institutions at the center of a new and more intense politics of education with vast financial and socioeconomic stakes. Private higher education is so reliant upon government for student financial aid and other grants and benefits, that “private higher education” is, in fact, an oxymoron. Higher educators like to pretend (and some believe) that it is improper for political bodies to challenge university admissions policies or academic performance - that politics and education should not mix. But a business as highly affected with a public interest as higher education is cannot escape intrusion.

Political control of public higher education is largely in the hands of legislative bodies, governors, and more directly, in state boards of education or individual university boards. The vast majority of board members are appointed by governors or legislatures. In some cases, state residents elect university boards. The result is a large number of political boards, each with a politics of its own. In every state the clash between higher education and state legislatures and governors grows more intense. At the national level, the contest over enormous student aid funds

commands continuing attention. In short, higher education is in politics.

The Elements of Accreditation

Accreditation is a process by which recognized authorities (according to *Roget's Thesaurus*) endorse, support, certify, validate, authenticate, approve, authorize, warrant, or subscribe to an activity. Accreditation presumes that recognized authority establishes certain standards — legal, professional, moral, or otherwise. It resembles the concept of the rule of law — that pre-established standards of behavior (rather than whim, caprice, or *post hoc* determinations) control the administration of rules. Legitimate authorities may change rules, but the changes are prospective. Failure to receive accreditation results in loss of privileges or loss of license to operate.

Accreditation serves three vital public purposes. First, it assures those seeking or dependent upon a service that the service offered meets established standards of health, safety, public welfare, or competence. Second, accreditation serves the interest of those who offer a service by validating that they meet the same standards as their accredited competitors and separates them from those who do not meet accredited status. Third, accreditation serves notice that an activity is worthy of support in time, money (public or private), or commitment by interested individuals.

In most nations, a centralized ministry of education manages and certifies higher education. The United States divides authority over education between the national and state governments. The United States Constitution presumes that state governments control, charter, or license education institutions. All states provide substantial financial support toward this end. The national government supports higher education through student financial aid programs and research grants, thereby using its funding power to establish and monitor the behavioral expectations of recipients.

Accreditation for the purposes of establishing and evaluating standards and expectations of quality is vested in voluntary associations of regional general accreditors and specialized professional or

vocational groups. Both state and national laws and regulations provide some guiding or minimal standards for evaluating quality.

Higher education institutional or regional accreditation evaluates an entire institution. It affords broad discretion to institutions to provide a service (e.g., a bachelor's degree) and permits the institution to award a degree provided that some established minimum criteria or professional guidelines are met. The accreditors' function is to ratify the accuracy of what the institution purports to offer.

In the case of specialized or program accreditation, the accreditors, in consultation with practitioners, predetermine most of what constitutes fulfillment of requirements necessary to receive imprimatur. For example, a university could not claim to train lawyers, physicians, or engineers according to its own definition and then expect accreditation because it does what it says it will do; rather predetermined professional standards required for the training of lawyers, physicians, or engineers must be met if graduates are to receive licenses to practice.

The result is a mixed and sometimes even confusing system of accreditation. Various forms of the same enterprise exist: some are public, some private. All are engaged in similar activities and are subject to various forms of government and self-regulation. It is no exaggeration to suggest that few members of the public and only a small minority of participants in higher education understand or grasp the elements or significance of higher education accreditation.

Government Regulation and Education's Myths

The impending intense relationship between government and higher education requires that the higher education community give up five preferred beliefs in which it has strong investment.

"Accreditation is voluntary." Other than the fact that accreditation is not required for a school to operate, only an accredited institution can secure public funds in any form, have its coursework

accepted by accredited schools, or have its graduates professionally certified. Continued insistence that accreditation is voluntary belies a common understanding of "voluntary" and the authority of accreditors.

"Each college or university is unique in its history and culture." This claim frequently serves as both a promotional and defensive device. Yet schools are more alike than they are willing to acknowledge — especially within sectors. In all categories, few institutions differ in terms of their course offerings, faculty rights and obligations, and student characteristics. Were it otherwise, accreditation standards and processes would be virtually meaningless and each institution would be vulnerable to "unique" government attention.

"Educational quality cannot be evaluated by those outside the academy." The "mystery" of going to college is fading and higher education's enhanced status in the political economy calls for increased participation by people outside the academy. This will address the primary flaw in the voluntary, peer-oriented accreditation system: its susceptibility to conflicts of interest. Such conflicts can arise first from the management of the system by the heads of education institutions and professional associations that are subject to accreditation by one another. Second, the near total reliance upon peer evaluation tends to emphasize collegiality rather than compliance. Third, specialized accreditors control entry to their own professions. Ideally, judgment regarding the quality and reliability of an enterprise should come from some independent source. Increasingly, accrediting agencies are inviting "public" members to join visiting teams and to perform other accrediting functions.

"Higher education is not a 'business' subject to the rules of the professional and commercial marketplace." Any critical enterprise dependent upon sales (enrollments) and huge investments of public and private funds is in "business." While much of what takes place on a campus is not subject to a profit and loss analysis (notably teaching and research), the means by which those activities are

managed certainly are. Both public and private higher education's dependence upon taxpayer's funds calls for accountability regarding its uses. Few notions irritate the public more than that of higher education as a privileged enterprise.

"Politics can and will be kept out of higher education." Higher education maintains a fiction of neutrality and non-partisanship. No enter-

prise so heavily dependent upon public funds can be out of politics. Indeed, continuation of the fiction will impede the development of sound government-higher education relationships and responsible management of the higher education enterprise.

The Tasks of Accreditation: Addressing the Role and Purpose of Higher Education

Increasingly, our nation appears to believe that most people should at least try to go to college and that an individual is not likely to amount to much without a college education. College is rapidly replacing high school as the minimum credential for employment. Neither our high schools nor higher education is prepared for this profound change in the social contract.

“Higher education” appears to cover almost any form of education or training after high school. Community colleges constitute a third of all higher education institutions and enroll about 40 percent of postsecondary students, a small percentage of whom earn associate degrees. The dropout rate at four-year colleges and universities exceeds 50 percent (except at elite schools). Remedial studies in reading, writing, and arithmetic are commonplace at more than 70 percent of colleges and universities. Students commonly take five, six or more years to complete a “four-year” degree. Nevertheless, the nation is using tax incentives, grants, and loans to promote college attendance.

Varieties of new programs, requirements, and degrees have been created and within recent years, new and old occupations have laid claim to the need for additional educational requirements, mostly technical or vocational in nature to earn professional status. The growth in specialized accreditation bodies attests to the complex contemporary fabric of higher education.

There are lots of colleges but what are they supposed to do that high schools have already failed to do? And how are the values of different institutions or programs to be evaluated or compared? Given the emphasis upon higher education as the gateway to a decent livelihood and the apparently universal concern with expanding access

to colleges and universities, something seems amiss. *Should not issues such as these be the task of accreditation?*

Are we a better-educated nation than fifty, twenty, or even ten years ago? Lots of people attend college but there is little evidence of learning outcomes or even agreement on what those outcomes should be. Graduation rates have remained about the same since 1975. Legitimate questions have been raised regarding the role and benefits of higher education investments. *Are these issues not the task of accreditation?*

What social purposes should the universities serve? What should our institutions teach? How should students be taught? What research functions rest with universities? What are we preparing people for? How will they be prepared before they come to college? What is the role of technology in the educational process? Given increasing enrollment demand and the changing nature of the population in cultural and racial diversity, the political and financial implications of these questions are enormous. *Are these issues not the task of accreditation?*

Would it not be better to put more resources into elementary and secondary education (to make them what we pretend they are) and place less reliance on what may well be an overblown higher education system? Why is higher education expending huge sums on remediation in high school subjects? Why do we accredit colleges and universities that regularly lose more than half their enrollments? *Are these issues not the task of accreditation?*

All higher education is not the same, yet we do little to help the public understand the real differences among institutions and academic

disciplines. Such information could prove useful. For example, do most people understand how an Ivy League or flagship state university differ from the typical regional state university? Are there not important differences among the institutional types that should be reflected in the accreditation process? *Is this not the task of accreditation?*

Would it not be ironic if a more realistic and stringent system of accreditation of higher education could result in better elementary and secondary schools and fewer colleges and universities?

The Tasks of Accreditation: Distributed Students and Distributed Learning

Two recent developments make the task of defining higher education even more difficult. The first is the rise of adult education and the second is the veritable explosion of new educational technologies and learning styles that challenge the very need for a campus.

Only one out of six “traditional” 18-to-22-year-old students is enrolled full time and lives on campus. Students over age 25 account for more than 40 percent of higher education enrollments. Many are in graduate programs (now *de rigueur* for many occupations), but large numbers, like their younger classmates, are in community colleges, or in continuing education programs in four-year schools, taking courses for vocational or personal reasons. Adults of all ages, including senior citizens, enroll full time as undergraduates, blending into the landscape of “traditional” college students. Yet, the return of older students is treated as somewhat strange, “non-traditional,” and a special burden. Are such distinctions necessary? Are we doing enough to accommodate changes in enrollment patterns? *Are these issues not the task of accreditation?*

Dramatic changes in technology have sparked alternative forms of higher education. Classes on campus are no longer a given. Entrepreneurial and innovative providers of new learning systems defy classification in traditional higher education terms. New for-profit degree-granting institutions enroll hundreds of thousands at learning centers or through computer driven distance learning programs. Some industry-related groups are forming alliances with established colleges and universities, public and private. Colleges and universities are forming their own consortia, within and among

states, to promote distance education. We can only guess as to the likely consequences of the “virtual university” and these new ways of “going to college.”

The nature of faculty work is being radically altered; many of the new providers of higher education employ predominantly part-time and untenured faculty. The emphasis appears to be on student convenience, flexibility, and credentialing in the practical arts rather than on building a core faculty.

Conflict between traditional higher education, with its built-in resistance to change, and new proprietors and consortia leaders, with their aggressive entrepreneurship, is inevitable. Many of the providers are names on the stock market, targets of investment opportunity in a highly competitive business. Higher education has established neither agreed-upon standards nor workable regulatory processes to govern entry to its business by a new generation of entrepreneurs. *Are these not the task of accreditation?*

Geography is likely to prove either irrelevant or of minor consequence to future enrollments, thus challenging further the need for the overblown physical plants of most campuses. Vast sums of money currently spent on student services and activities (primarily for undergraduates — a function that we now call “student life”) will prove marginal to new students and their modes of learning. It is time to rethink the energy and funds directed towards campus entertainment, athletics, and personal service activities that are ignored or underutilized by an increasing majority of registered students. *Is this not a task for accreditation?*

The Tasks of Accreditation: Leading the Conversation About Redefining Higher Education

The nation maintains its enormous commitment to education. But unless we accept most of the tasks outlined above, we will remain confused about the true meaning of higher education. Should not a college degree convey more than the accumulation of credit hours? Is there not a difference between vocational or applied studies and higher learning? The higher education community appears unwilling — not merely reluctant — to consider these questions. Consequently, academe has spurred a serious disconnect between itself and those upon whom it is reliant for support.

Our nation accepts the idea that the preservation, discovery, and transmission of knowledge deserve support. Legislative bodies and the public have demonstrated their willingness to pay for higher education. Indeed, public support is generous and almost uncritical.

This support suggests that the public and policy makers recognize that the importance of the *substance* of what a college or university does; moreover, that activity does not need to be subject to the demands and expectations placed upon other enterprises. Ideological and political concerns may evoke questions about what we teach or study, but the record shows little cause for the academy to raise the battle cry of academic freedom. The public cares about job prospects following education but it does not expect higher education to forego liberal arts and sciences in favor only of job training.

From such an explosive but necessary venture — addressing these tasks — can flow new definitions of what we expect from the holder of a secondary school diploma and of what is signified by college degrees from different types of institutions. We need to respond to the changed nature of the

student body and to recognize the implications for campus life. The impact of new pedagogical techniques and resultant changes in faculty-student relationships need quick attention. And, for the protection of the academy, we must acknowledge the differences between academic substance and responsible, business-like process.

Each task is complex and requires a fresh look at higher education through unfamiliar lenses. It is not unusual for communities to cling to old myths and to fault the bearers of unwelcome news. But the nation has a right to expect more of an enterprise that purports to be governed by reason and evidence. American higher education is currently defined by its openness to almost everyone and everything; it is a model without precedent. To make sense of it and to maximize its utility to society requires concerted attention to difficult issues. Higher education can gain that attention by conferring authority and legitimacy on an accreditation system wherein independence of judgment and dramatic strategies for addressing change find support.

The *process* by which we conduct our business is a different matter entirely. Higher education's resistance to changes in managerial practices, personnel policies, or financial accountability amidst unprecedented social and educational change has not gone unnoticed by political leaders, business leaders, tuition-paying families of students, and taxpayers generally. The oft-used phrase that "higher education is not a business" is seen as a straw man to counter accountability or, worse, as silly. The process by which higher education sustains itself certainly is business and it is the business of those who pay for it. The more

important higher education (however defined) becomes to the general public and the more reliant higher education becomes upon public funds, the more sensitive it must be to the business sense of the American people and their representatives. Demands for greater public accountability of campus expenditures and for assessment of educational outcomes will intensify.

If we expect our supporters to understand the value of what we do as teachers and scholars, then we need to demonstrate through the provision of appropriate and understandable information that we deliver on those values. A concerted effort of this kind may well reveal what we can defend and what we cannot explain. *Is this not the task of accreditation?*

The Council for Higher Education Accreditation proposes to search for understandable and translatable measures of quality, examining *resources, processes and results* associated with meritorious performance. Thus examined, quality

suggests high standards for academic personnel and programs, accountable business practices, and demonstrated achievement, consistent with public policy responsibilities. Such an approach could promote the legitimate tasks of accreditation while staving off government takeover of the accrediting system.

CHEA can initiate the conversation that must take place among accreditors and higher education associations — addressing the structural and functional problems that need major public policy resolution. The critical issue is whether accreditation will be used to address the meaning of the changing national role of higher education. Such discussions commonly fall victim to turf battles and structural disputes. Those issues, too, must be addressed, but only after some agreement is reached on the tasks of accreditation. In the final analysis, form will follow function.

Conclusion

To enjoy even a modest degree of independence from national or state government, higher education must demonstrate that it can police itself. It needs to be aggressive in its acceptance of more responsibility. The guiding principle for higher education thus far has been that it keeps itself pure by using accreditation only for “quality” control.

Voluntary accreditation was put at great risk a few years ago when its leaders eschewed responsibility for monitoring financial aid abuses. In another incident, a regional accrediting body challenged the membership of a college governing board in an effort to promote diversity. Both events reflect a disconnect between higher education accreditors and the reasonable expectations of the public. The ramifications linger in the current confused status of accreditation and its relationship to government authorities.

The 1992 amendments to the Higher Education Act increased state and national regulatory

control over academic standards and processes. Higher education remains substantially in charge of its own quality standards, but each year new battles must be waged in Congress and state legislatures to restrain further encroachment.

The higher education community committed itself to a fresh look at its self-regulatory activity in 1996 with the formation of a new national coordinating organization for voluntary accreditation efforts. To date, it has achieved some success, especially with the 1998 reauthorization of the Higher Education Act and elimination of State Postsecondary Review Entities (SPREs) as well as diminution of some administrative obligations placed on accreditors in 1992. Accreditation appears to be the only vehicle available to guide higher education to responsive and responsible new roles to address society’s emerging expectations. *Is this not, in sum, the task for accreditation?*

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