

***ROLES AND RELATIONSHIPS: ACCREDITATION AND  
THE FEDERAL GOVERNMENT***

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to the  
National Advisory Committee on Institutional Quality and Integrity  
February 3-4, 2011*

***ROLES AND RELATIONSHIPS: HOW DID WE GET HERE?***

However unexpectedly, we have arrived at a decision point about accreditation and the federal government. We need to answer, once again: "What role is U.S. accreditation to play in the future?" and "What need to be the defining features of accreditation's future relationship with the federal government?" The policy forum document that provided the conceptual foundation for this meeting makes this clear, as does the December 23, 2010 letter of invitation to serve on a panel, indicating that the forum's purpose is to develop recommendations to "...change and strengthen accreditation" – a description of purpose that assumes accreditation needs to be modified in some ways.

To address the decision point and once again develop answers about accreditation's role and relationship to government, we need to look briefly at the fundamentals of accreditation, the key elements of the federal interest in accreditation and the national conversation about accountability. What answers might we fashion?

***The Role of Accreditation and Fundamental Principles***

It is worth reminding ourselves that accreditation has long served as the primary vehicle for assuring and improving quality in higher education. Students, governments, employers, the press and the public all acknowledge this role. Accreditation's fundamental principles provide the grounding for a process that involves careful examination of colleges, universities and programs. Accreditation establishes confidence that an institution or program meets at least threshold standards of quality and engenders trust that college or university credentials or degrees will be respected.

Accreditation, calling for an independent, peer/professional review of higher education quality, is based on four fundamental principles:

- Responsible academic independence of institutions and academic freedom of faculty are essential to sustaining the quality and success of higher education.
- Self-regulation through accreditation is a demonstrably effective means to review, judge and assist with improvement of the complex set of educational experiences offered in our colleges and universities.

- A strong institution–accreditor relationship is central to assure that institutions, in carrying out respective missions and academic leadership responsibilities, sustain ongoing improvement and are appropriately scrutinized with regard to achieving their goals.
- Acknowledging and acting on appropriate accountability is a key element in sustaining credibility with federal and state government, students and the public.

### ***The Relationship of Accreditation and the Federal Government***

The accreditation-federal government relationship began some 60 years ago, with government turning to these nongovernmental bodies as reliable authorities about the academic quality of institutions that sought eligibility for federal funds. A public-private partnership was created. The relationship came to be built around “recognition,” a periodic scrutiny of accreditation standards and practice carried out by the federal government.

Over time, as higher education enrollments grew, as the Higher Education Act of 1965 and subsequent amendments were enacted and as increasing amounts of federal money were made available to institutions and students, federal interest in accreditation practice grew. The initial scrutiny of accreditation became codified in law and the government’s expectations expressed through regulation routinely expanded and became increasingly complex.

### ***Enter “Accountability”***

Both the role of accreditation and the accreditation-federal relationship are caught up in a dynamic captured by the term “accountability.” Today’s accountability is multi-dimensional. It is about answering to the public about student learning and relying on external regulation of many social institutions. It is about full transparency and efforts to standardize expectations about quality and performance to enable instant judgment and comparison.

For accreditation, accountability has meant additional attention to student achievement and information to the public, primarily through revisions to accreditation standards and policy. There have been major changes during the past ten years, with institutions and programs now required to establish expectations of student achievement and provide evidence of success. Colleges and universities are to expand the information they provide the public about what students learn. Coincident with the work of accreditation, many academically driven efforts to enhance accountability and improvement have been developed through national higher education associations, including, e.g., the Voluntary System of Accountability of the Association of Public and Land-grant Universities and the Essential Learning Outcomes of the Association of American Colleges and Universities.

Today’s accountability has also meant, more often than not, that accreditation is described, albeit erroneously, as inadequate. It is not enough, apparently, to (1) be answerable to the institutions and programs that are reviewed (self-regulation), (2) make extensive use of peer/professional review, (3) provide some but not all information to the public, (4) rely heavily on qualitative judgment about academic quality and (5) sustain a mission-based approach to quality that may not readily lend itself to standardization of expected results. This is accompanied by a tendency to overlook the value of

accreditation especially with regard to quality improvement and to ignore the contribution of accreditation to what is, unarguably, a higher education enterprise highly valued for both its access and quality for many decades.

For government, today's accountability has meant the challenge of overseeing the profound public responsibility that accrediting organizations shoulder with regard to appropriate expenditure of federal funds. An enterprise that routinely provides access to hundreds of billions of dollars of public money requires ongoing scrutiny. The result has been government (1) becoming more and more engaged in the day-to-day operation of accreditation and (2) increasingly involved in judging what institutions are to be accredited, along with accreditors. Accountability has also meant protecting the public against shoddy quality or, worse, outright fraudulent degree mills and accreditation mills.

Accountability has introduced enormous tension into the accreditation-federal relationship. On the one hand, we have an accrediting community that continues to value and advocate for its fundamental principles as the basis for continuing its work. It is focused on accountability but, even as it addresses these issues, there is great apprehension that the pressure to act and the continued assertion of accreditation's inadequacy will force the abandonment of its fundamentals. On the other hand, we have a federal government that is strongly pressured to put accountability first, responding to demands deriving from the amount of federal money in the higher education, determination that the United States needs to do more to be internationally competitive and demands for transparency and value for money from taxpayers, the press and students. There is diminishing acknowledgment of accreditation's fundamental principles.

### **WHAT DO WE DO?**

Some argue that accreditation must fully accommodate current accountability demands, even at the price of its fundamental principles. They often want to achieve this through expanded federal or sometimes state control. Others argue that accreditation's fundamentals and effectiveness should not be the price of accountability, that accreditation should retain the capacity to address accountability on its own. They argue that accreditation works best when it reflects grass-roots, consensus-driven decision-making of colleges, universities and programs – and this includes accountability.

The Council for Higher Education Accreditation (CHEA) has long argued that the issue is not either/or. This is key to providing a fresh response to the questions about the future role of accreditation and its relationship with government.

*First, accreditation can both retain its principles and work with the academic community to further strengthen its accountability.* Building on the progress described above, accreditation, institutions and programs can (1) explore means to identify common expectations of what counts as desirable results from successful colleges and universities, (2) identify and share effective practices in transparency, (3) concentrate on building greater expertise among the thousands of peer review volunteers and (4) additionally strengthen the efficiency and effectiveness of quality improvement. Provided that these efforts are driven by the academic community, relying on its institutional leadership and focusing on grass-roots consensus, they are consistent with fundamental principles undergirding accreditation.

*Second, CHEA has urged that the federal government place greater emphasis on holding accreditation accountable to obtain the results – in contrast to directing or prescribing that accountability.* “Holding accreditors accountable” is about the government focusing primarily on evidence that these organizations are meeting federal recognition standards. It does not stipulate how the standards are met; this is up to the accreditor. This is contrasted with “directing or prescribing accountability” that does specify how standards are to be met, in addition to obtaining evidence. When recognition review results in a judgment that an accreditor needs to do more with, e.g., the evidence it obtains with regard to federal standards about curriculum or faculty, this is holding accreditors accountable. When the review results in telling the accreditor that, e.g., it must set specific curricula or faculty credentials in place to meet its standards, this is directing or prescribing accountability.

We have, unfortunately, a growing number of examples of a shift from “holding” to “directing and prescribing.” These include a new regulation that accreditors must use a federal definition to judge institutional decisions about determinations of academic credit hours. They include the most recent appeals language in the Higher Education Opportunity Act of 2008, with government designing this process for all accreditors. Most recently, they include a requirement that an accreditor must annually report to the government with regard to actions to accredit institutions new to the accreditor.

Even the language that is used in the federal recognition review supports federal directing and prescribing accountability. Might we cease talking about recognition review as a “petition” – suggesting that accreditors are supplicants? Might we talk less about “compliance” with federal expectations and more about, e.g., “alignment” or “providing evidence” with regard to meeting federal standards? Changing the language might also be accompanied by discouraging practices that are at odds with the fundamental principles of accreditation, e.g., an emerging “co-accreditation” or government officials offering second opinions about the peer-based judgments to accredit individual institutions.

### ***Accountability Revisited***

*Third, we would all benefit if we could agree that the accountability conversation needs to be focused on institutional performance as our key evidence of student learning.* Accountability, as indicated above, covers many things. Yet, especially with regard to student learning, our conversations rarely reflect clarity with regard to how we address accountability. Sometimes we want information about the achievement of individual students. At other times we want information about the performance of institutions. Some treat success with rankings such as *U.S. News and World Report* as being accountable. We need agreement, for public policy purposes, about what counts as accountability in this vital area.

With regard to individual student achievement, there is no way to create and implement a single national judgment about learning for each of the millions of students in higher education. And, judgment about student achievement is the work of faculty, not government and not accreditation.

Might we agree to give primary attention to institutional performance indicators as addressing accountability to the public for student learning? We can identify a short list of indicators, e.g., graduation, achievement of educational goals other than degree

acquisition, entry to graduate school, successful transfer and (where appropriate), job placement. Indicators would be mission-driven; there are many other options. Whatever the indicators, they focus accountability attention where it needs to be: on evidence that our colleges and universities are producing results.

Primary attention to institutional performance indicators has many benefits. It creates common ground for the academic community, accreditation and the government when addressing accountability. It encourages institutional leadership and institutional improvement. It respects institutional mission. It does not second-guess the work of faculty. It will likely produce greater transparency. It will likely lead to greater comparability. Use of indicators clarifies the role of accreditation in society. It provides a fresh baseline for the accreditor-government relationship.

There are drawbacks as well. There are those who believe that institutional performance is not an adequate means to address academic quality. Some would argue that agreement on performance indicators would be a first step toward national standards for higher education and this is undesirable. In contrast, others would maintain that using mission to drive the indicators reinforces a lack of accountability.

If the federal government, accreditors and the academic community could agree that information from institutions about performance indicators addresses our accountability expectations, the task of accreditors would be to assure that institutions have established performance indicators, collected evidence, judged the evidence and published the evidence of their results. The task of federal recognition would be to hold the accreditors accountable that institutions are doing this work.

***The Decision Point: Answering Once Again – A Summary***

“What role is U.S. accreditation to play in the future?” The role of accreditation is to affirm and enhance the academic quality of our colleges and universities. This is done most effectively by building on the four fundamental principles stated above, accompanied by a significantly expanded investment in shared expectations and evidence of success with clearly stated institutional performance indicators. It works best when relying on an even more robust peer review process with enhanced expertise when reviewing institutions.

“What need to be the defining features of accreditation’s future relationship with the federal government?” We need a public-private partnership, defined around standards and regulations holding accreditors accountable for assuring that colleges and universities comprehensively and effectively address institutional performance indicators in the context of mission. This needs to be done in a context that acknowledges the fundamental principles of accreditation, supports efforts to enhance transparency and insists on responsibility for performance.

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