

RUNNING FROM ACCREDITORS MEANS RUNNING FROM ACCOUNTABILITY: WHO IS LEFT WITH THE TAB?

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THE ROLE OF RECOGNITION

Not too long ago, accreditation was a relatively overlooked aspect of discourse in higher education. A topic that many people often misunderstand regarding its practice and its importance in higher education.

However, recent legislative developments from Florida, such as its ruling on Senate Bill 7044 and North Carolina's ruling on House Bill 8, have brought accreditation to the forefront of public higher education conversations. With accreditation now commanding increased attention, it is crucial to combat misinformation and ensure individuals are well-informed.

In recent news coverage and editorial pieces, accreditation associations have been painted as cartels, a word often used in describing an organization that maintains a monopoly by restricting competition, or illegal drug activities (Burke et al., 2023; Gillen, 2023).

Some accreditation critics state that accreditors have too much influence in higher education suggesting that their efforts may affect institutional autonomy and that they are allegedly structured as legalized monopolies answering to no one (Gillen et al., 2010). There are similar allegations from misinformed individuals who, for example, oppose issues focused on critical race theory and diversity, equity, and inclusion initiatives. This has led to some individuals referencing accreditors as agents of the progressive or "woke" movement to influence or conform colleges to a certain ideology. Some have even begun an effort to "de-accredit the accreditors."

This claim or likening of accreditation bodies to a dictatorship-structured cartel is propaganda and cannot be further from the truth. The effort to de-accredit the accreditors indicates that the misinformed are unaware of the reality of the current accreditation process. For example, Florida Governor Ron DeSantis was quoted in June 2023 saying, "You cannot take legislative power and delegate it to an unaccountable, private body, and let them administer that power without any type of checks and balances" (Spitalniak, 2023). The problem with this statement is simple; it is completely false.

Accrediting organizations have administrative structures that provide checks and balances both within their organizations and through external measures to ensure fair and legal practices are executed during the accreditation process. In addition to accreditor's governing boards, ac-

creditors also answer to outside organizations to ensure the institution assures quality within their higher education institution.

Most literature critiquing accreditation often omits a crucial element of the accreditation process – recognition.

What is recognition? Recognition is the process where both institutional and programmatic accreditors have several checkpoints of good practices that must be met. An institution accredited by a USDE-recognized accreditor then gains access to award Title IV funds, such as Pell grants and federal loans, for their students who qualify for such awards. In other cases, accreditors can obtain recognition from the Council for Higher Education Accreditation (CHEA). CHEA advocates for the value and independence of accreditation, recognition of accrediting organizations and commitment to quality in higher education. Accreditors that wish to be recognized by CHEA have chosen to do so to have an affirmation stating that they meet the quality expectations of the higher education community.

Both of these processes are voluntary, but more than 80 accrediting organizations that accredit more than 8,200 institutions and 44,000 programs of study have chosen to be recognized by either USDE and/or by CHEA. These processes can take anywhere from 18 months to two years to complete to be recognized by either CHEA or the USDE and are intentionally rigorous for the accrediting organization. While many higher education professionals recognize and are aware of this process, many outside the field are unaware.

For the next part of this analysis, I will explain the process of recognition within CHEA and the USDE, and why it is important for accreditors to go through each process and the benefits of seeking recognition from each.

CHEA RECOGNITION

The 2021 CHEA Standards and Procedures for Recognition require that an accreditation organization complies with and provides evidence that it meets Standards 1-3 and an additional Standard 4 if the accreditation organization engages in international accreditation activities.

The four Standards are as follows:

- Standard 1- Academic Quality and Student Achievement
- Standard 2- Accountability and Transparency
- Standard 3- Accreditation Structure and Organization
- Standard 4- Capacity and Compliance for International Accreditation¹

When accreditation organizations, both programmatic and institutional, wish to seek recognition from CHEA, they first must submit an application which is reviewed by the Committee on Recognition (COR). It is composed of nine individuals with a variety of professional backgrounds and a level of involvement in accreditation policies and practices within their own jobs. This process should begin anywhere from 18-24 months prior to the organization's term of recognition ending. Members of COR may serve a three-year term and are eligible to be appointed for a maximum of two additional terms.

The Committee does not hold sole power in their decision-making. The COR can decide on a variety of outcomes after a review process – approval, denial, and withdrawal, all of which require approval from the CHEA Board of Directors. The CHEA Board of Directors is composed of twenty individuals who hold positions and have experience within higher education administration

¹ The Council for Higher Education Accreditation published their latest standards in 2021 and can be found at <https://almanac.chea.org/recognition-accrediting-organizations> more information on the Department of Education's Standards can be found at the same link.

as presidents, chancellors, directors, and trustees from a variety of institutions not limited to state systems, Historically Black Colleges and Universities, community colleges, professional and career-focused institutions as well as private and public institutions.

CHEA's role in serving institutions of higher education is to strategically support student success through higher education experiences, as it provides guidance to the accreditors who review academic quality. CHEA works with Congress and USDE to ensure that higher education remains autonomous in decision-making matters of academic performance and academic quality. The benefit of having membership with and being recognized by CHEA is having an additional stamp of approval or affirmation that colleges, universities and accrediting organizations meet the quality expectations of the higher education community. CHEA was established by college and university presidents as a means of affirming the quality of peer review, formative evaluation, and a mission-based approach to judging higher education, as well as placing primary emphasis on quality improvement. For institutions who wish to broaden their scope and influence in the education world beyond the United States borders, CHEA has a branch of international quality assurance called the CHEA International Quality Group (CIQG). CHEA is unique in that although it does not gatekeep any funds, U.S.-based accreditors seek recognition from CHEA in order to ensure institutions across the world are functioning at the highest levels of quality assurance as determined by the non-governmental entity.

UNITED STATES DEPARTMENT OF EDUCATION RECOGNITION

Receiving and maintaining accreditation is vital for many institutions. Accreditation serves as a practice that controls access to federal funds from Title IV, such as Pell grants and federal loans, seemingly the greatest benefit to being accredited by a USDE-recognized accreditor. Many students depend on these monies to pay for tuition and attendance costs of many institutions of higher education. Receiving accreditation is not a simple task at the program or institutional level, and neither is receiving recognition at the federal level. As stated on the USDE website,

“There is no standard application form to be used by agencies applying for recognition. Rather, an agency's application for initial recognition or renewal of recognition consists of a narrative statement, organized on a criterion-by-criterion basis, showing how the agency complies with the Secretary's Criteria for Recognition. The narrative statement must be accompanied by clearly referenced supporting documentation, including the agency's standards and procedures, published lists of approved schools or programs, self-evaluation guidelines, guidance materials for visiting team members, and sample completed self-evaluations and site visit reports, as appropriate to the criteria used.”

Whether the organization is accrediting institutions or academic or specialized programs, the organization must be initially reviewed by the Department's Accreditation Group staff as well as the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Both groups submit their own recommendations to a USDE Senior Department Official who makes the final decision regarding if the accrediting organization can function as a gatekeeper for federal funding after reviewing their extensive applications. Already established accreditors must go through the same groups to maintain their recognition and the ability to gatekeep federal funding. The Department's website suggests institutions should plan to submit their application for renewal of recognition approximately two years prior to one of the two annual NACIQI meetings, whichever precedes their expiration date.

Within this conversation of creating an adequate system of checks and balances, it is important to note who and how these additional groups are appointed. NACIQI is composed of 18

members with six-year membership terms. The members are appointed by three different people or groups, the U.S. Secretary of Education, the House of Representatives, and the Senate each are responsible for six appointments.

There are many additional steps including but not limited to: staff analysis, both public and private hearings before the organization's respective advisory committee and determination or final decisions coming from additional groups, whether that is CHEA's Board of Directors or a Department of Education's Senior Department Official based on the committee's recommendations. On top of a rigorous application process, there are lengths taken both by CHEA and USDE to ensure that conflict of interest is avoided in every aspect of the recognition process as individuals read the application materials.

It is important to note that to insinuate that accreditors are an unaccountable, private body, and let them administer that power without any type of checks and balances is simply not true. The checks and balances are plenty, but legislators may overstep their roles and obligations to the taxpayer if the process does not go as they planned. This type of action has led elected officials to legislate Florida's SB 7044 and North Carolina's H.B. 8. Michael Schwalbe (2023), professor emeritus of sociology at North Carolina State University wrote in a piece earlier this year, "The great strength of the accreditation process is impartial review by peer experts. Accreditation reviews are done by people—professors and other academic professionals—who know what expertise looks like, what knowledge is current, which teaching practices are best, and what threatens academic freedom. Anyone who has participated in an accreditation review knows the process can be irritatingly long, thorough, and critical." Schwalbe went on to acknowledge that although the current accreditation system is not perfect, it is not broken. In another point of clarity, it is important to note that as of February 2020, USDE regulations eliminated the distinction between regional and national accreditors, making a freer market. Institutions now may choose to leave their previous "regional" accreditor. These new laws only put added and possibly unwanted pressure and additional financial constraints onto institutions to change accreditors regularly.

STUDENTS AND TAXPAYERS FOOT THE BILL

Although accreditation is a voluntary process, it is not a cost-free process. The financial impact not only costs dollars and cents from a direct budget line, but also requires already limited staff time and attention to this area of concern as the institution runs the risk of not being able to receive federal funding should their accreditation from a USDE-recognized accreditor lapse due to an oversight within the application process with a new accreditor. Governor Cooper of North Carolina emphasized this concern in his statement made after signing HB 8 into law, "...the changes to the university and community college accreditation process are onerous and will add an unnecessary burden and increase costs for our public higher education institutions. The General Assembly should reevaluate these requirements" (Moody, 2023).

There are many dues and fees that institutions must pay to first apply, as well as maintain compliance with their accreditor. In an effort for transparency, the average cost for a traditional or expedited eligibility process can range from \$25,000 to \$65,000 per institution, and these averages do not include travel expenses for the review team that may cost an additional \$15,000 per visit. The cost averages do not include the cost of annual dues and additional visit costs as the institutions will more than likely have to undergo a form of candidacy after a successful application. The process of switching accreditors will cost between \$11 million and \$13 million annually for the state system of Florida, according to board documents presented on August 26, 2022, though the annual expense of maintaining accreditation is expected to hover around \$250,000. In the same Florida Board of Governors meeting, additional information stated that institutions can expect to pay an additional \$2.3 million to \$6.6 million over the time as they switch accreditors every cycle.

The statements inferred that expenses and workload will temporarily increase, but in reality it will reoccur cyclically due to the outlines of having to maintain accreditation and look for a new accreditor every cycle and the increased expenses and workload may become far more present than previously foreseen.

The average cost of in-state tuition and fees for a year is \$4,541 in Florida and \$7,174 in North Carolina, respectively. What legislators in these states are doing, and the others that aspire to pass similar bills, is asking for the student and taxpayer alike to foot this bill that can equal at minimum the same cost as nearly 35 to 40 students' entire tuition and fee bills for the full academic year simply to maintain accreditation with one body. Although these two institutions are currently accredited by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), they are already paying annual fees to SACSCOC, the largest fee that is associated with applying to a new accreditor that is not being accounted for is the reapplication process now mandated after every cycle that will overlap with the current fees being paid. Florida State University System boasts having the lowest in-state undergraduate tuition in the nation and North Carolina sits just a few spots above in 43rd lowest (Hanson, 2023), but as costs rise and occur more frequently to remain in compliance, the cost will fall on student tuition, fees and even state taxpayers.

The hopes of these laws are to provide the opportunity for institutions to shop around for an accreditation body that will be more hands-off, but the chances of not running into similar concerns from another accreditor are very unlikely.

In another article, President Emerita of New England Commission of Higher Education (NECHE) Barbara Brittingham stated that NECHE would have likely made the same requests of those institutions. Her point was further emphasized when Barbara Brittingham explained, "As an accreditor, you can't ignore things that raise legitimate questions" (Whitford, 2022). Brittingham also said, "If SACS had a legitimate question, there's a very good chance that another accreditor would have the same question" (Whitford, 2022). The accreditation and recognition processes are in place for a reason and placing unnecessary and forceful legislation only highlights the ignorance of what is involved in these processes. These pieces of legislation have mandated a change and will only act as additional challenges and pressures on institutions, many who have been with their accreditors since the early to middle of the 21st century. If legislators held off, we could have seen some of Florida and North Carolina's institutions genuinely make a choice to change accreditors after the USDE action in 2020 to eliminate the distinction between regional and national accrediting agencies, but unfortunately, we will not be able to see that in the upcoming years as it is now mandatory by law.

In short, we do not know the full impact these new laws will have on institutions, especially for smaller institutions with smaller student enrollment, operating budgets and lower endowments, but it will unfold over the next decade as it pertains to student outcomes and cost of attendance. This recent state legislation did not grant access to additional accreditors the 2020 USDE action did by creating the one unified set of institutional accreditors. These legislative moves have only forced those who may want to remain with their current accreditor to move to another accrediting partner, and even if there is a good fit within a comparable accreditor, they will once again be forced to uproot their accrediting home at the end of an accreditation cycle. It is my hope that action is taken to help protect the continuity of improvement and innovation that comes from the accreditation process while protecting our students' best interests in the name of quality assurance.

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