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# Innovation in Accreditation and Higher Education: Accrediting Organizations Describe Their Engagement

CHEA/CIQG Publication Series

## **ABOUT CHEA**

The Council for Higher Education Accreditation (CHEA) serves its member institutions through its advocacy for the value and independence of accreditation, its rigorous and demanding standards for the effectiveness of U.S. accrediting organizations, its service as an authority and repository of actionable research shaping the future of accreditation and quality assurance and its leadership and commitment to quality in higher education nationally and internationally.

## **ABOUT NORC**

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## Foreword from CHEA

This survey and its findings provide a comprehensive look at U.S. recognized institutional and programmatic accrediting organizations and what they report about how they address the challenge of innovation with quality in higher education. Conducted for the Council for Higher Education Accreditation (CHEA) by NORC at the University of Chicago in 2018, the work is a continuation of CHEA's longstanding commitment to encourage, lead and support greater capacity-building in accreditation to meet the challenge to innovate throughout higher education.

The national conversation about innovation and the role of accreditation during the past several years has been driven by interest and concern in generating greater change in colleges, universities and programs. The desire for greater innovation, in turn, has been fueled by a number of factors, including technological developments applied to higher education such as predictive analytics, big data, artificial intelligence and augmented reality, transforming teaching and learning and how higher education operates. Interest in innovation is fueled by the emergence of alternative providers of higher education – massive open online courses, private companies offering educational experiences – as well as alternative credentials such as badges and digital certification. The need for enhanced workforce development combined with ongoing concern about college affordability have also placed a premium on innovation. A key part of this attention to innovation is assurance of quality, with accreditation as central to achieving this goal.

Four key points emerge from the survey:

- Accrediting organizations, in general, view themselves as moderately innovative.
- Innovation, as described by accrediting organizations, most often referred to distance education, competency-based education, changes in accreditation standards and the frequency with which either accreditors, institutions or programs were undertaking substantive change as

defined by the federal government in its oversight of accreditation.

- While a number of accrediting organizations review partnerships between traditional institutions and alternative providers of higher education, the majority do not plan to expand their work to focus solely on alternative providers.
- Accreditors view funding constraints and the traditional higher education business model as barriers to innovation in their work.

As the engagement with innovation continues to move forward, accrediting organizations might consider several important challenges:

- Whether and how to address the review of quality of alternative providers of higher education and even of alternative credentials, independent of traditional higher education.
- Whether to encourage and support additional types of quality review organizations that focus on alternative providers and credentials, and work with these new organizations in a partnership encompassing all innovation in higher education.
- How to focus additional attention on technological change – use of predictive analytics, augmented reality – and incorporate it into the development of future standards and policies as well as the conduct of self-study and peer review.

## Introduction

This report presents findings from a 2018 survey of recognized U.S. accreditors administered by NORC at the University of Chicago (NORC), an independent research organization, on behalf of the Council for Higher Education Accreditation (CHEA). The findings from the survey are being distributed via this research report on innovation in accreditation and via a companion report on accretor practices associated with student learning outcomes.

For the purpose of this research, “innovation in accreditation” refers to the role of accrediting organizations in engaging, leading and enabling new ideas and new approaches in their own work and in higher education. Each organization had its own interpretation of this concept of innovation.

## Research Methods

In consultation with CHEA, NORC researchers developed a questionnaire to gather data directly from institutional and programmatic accreditors about how they are thinking about and addressing student achievement and innovation. NORC invited 86 accrediting organizations (those recognized by the U.S. Department of Education and / or CHEA) to participate in the self-administered web instrument between July 10 and August 13, 2018.

To ensure participant confidentiality, NORC was responsible for sending all survey invitations and follow-up emails. Communications emphasized NORC’s nonbiased role in collecting and analyzing the data on behalf of CHEA. The link between the survey URL and participant list was maintained on NORC’s secure servers and not disclosed to CHEA staff.

Sixty-four (64) out of 86 accreditors responded to the survey for an overall response rate of 74 percent. Thirteen (13) out of 19 institutional accreditors surveyed responded (68 percent), and 51 out of 67 programmatic or specialized accreditors

surveyed responded (76 percent).

Responding institutional accreditors included five regional, five national career-related and three national faith-related accrediting organizations. The accreditors who participated in the survey provide accreditation services and reviews for more than 6,000 institutions and more than 22,000 specialized programs.

- Accrediting organizations, in general, view themselves as moderately innovative.
- Instances of innovation most often cited by accrediting organizations are:
  1. Distance education
  2. Competency-based education
  3. Changes in accreditation standards
  4. Frequency of institutions or programs undertaking substantive change as defined by the federal government in its oversight of accreditation
- At present, the majority of accrediting organizations do not plan to expand their work beyond traditional higher education.
- Accreditors view federal regulation, funding constraints and the traditional higher education business model as barriers to innovation in their work.

# Findings

## Accreditors Report That Their Practices are Innovative

The survey asked accreditors how innovative they are with regard to their accreditation practices. Approximately two-thirds of both institutional and programmatic accreditors believe they use “moderately innovative” practices, as indicated in Exhibit 1. Institutional accreditors were twice as likely to indicate that they use “innovative” practices (23 percent vs. 11 percent of programmatic accreditors).

## Substantive Change as a Proxy for Innovation<sup>1</sup>

Substantive change applications were seen by accreditors as a proxy for innovation among programs and institutions; 85 percent of institutional accreditors and 40 percent of programmatic accreditors reported a growth in the number of substantive change applications in the last five years. Additionally, nearly half of institutional and a third of programmatic accreditors indicated that they review their substantive change procedures once a year or more frequently, suggesting an interest in staying flexible in the work with programs and institutions as the higher education landscape evolves (Exhibit 2).

The process used by accreditors to handle substantive change requests is also viewed as an opportunity for innovation in their respective organizations, with one institutional accreditor indicating, “We have simplified the substantive change

requirements and processes and ensure a very quick turn-around on applications.” It is difficult to know what proportion of the substantive change applications were related to new or innovative practices or programs versus more routine expansion or consolidation, and this could be an area for further exploration.

## Types of Innovative Offerings that Accreditors Currently Review

The survey asked accreditors about the types of innovative offerings they currently review in the institutions or programs that they accredit. Exhibit 3 shows that 85 percent of institutional and 69 percent of programmatic accreditors reported their reviews include distance education, 77 percent of institutional and 33 percent of programmatic accreditors review competency-based education, 62 percent of institutional and 27 percent of programmatic accreditors review direct assessment with prior learning and 23 percent of institutional and 16 percent of programmatic accreditors review programs that rely heavily on virtual or augmented environments.

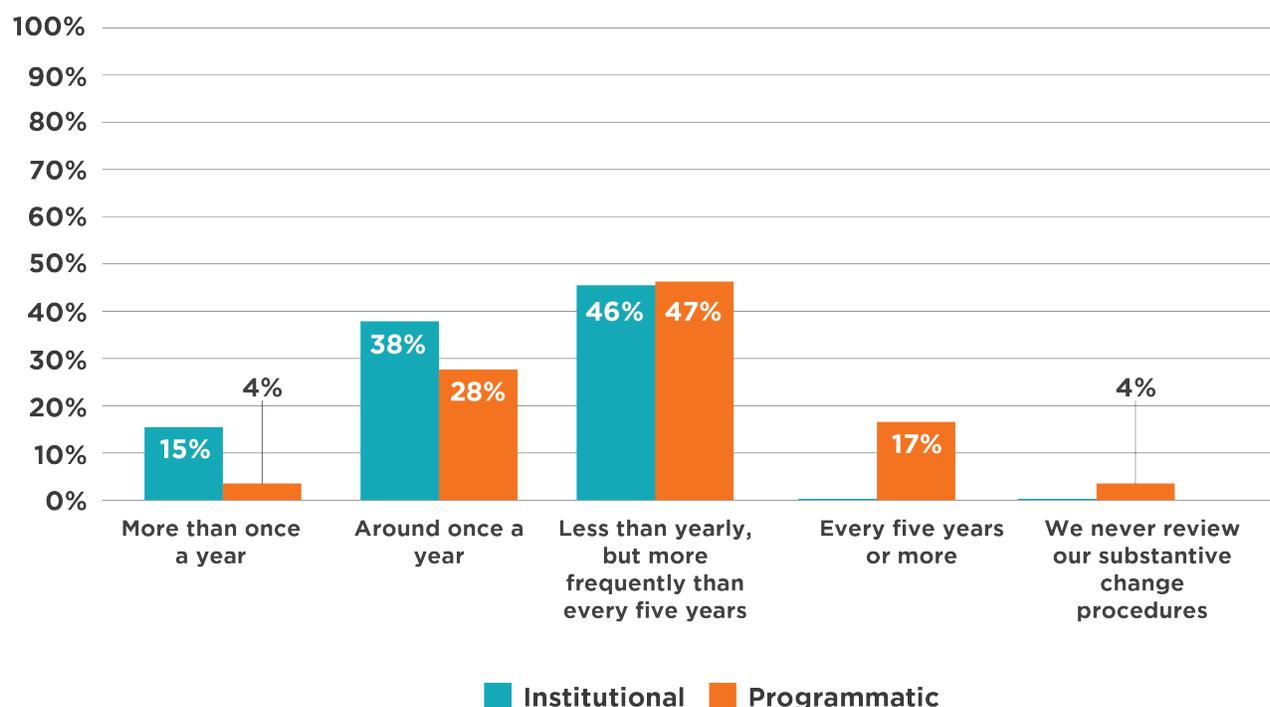
Finally, 23 percent of institutional accreditors indicated that they also review other offerings and their self-reported examples included credit for prior learning and dual credit, new degree levels and off-campus delivery sites. A smaller portion of programmatic accreditors (seven percent) indicated that they review other offerings, including cooperative agreements, contractual agreements, satellite/branch campuses, only primarily

**Exhibit 1.** Innovation in Accreditation Practices

Accreditor Type	Innovative	Moderately Innovative	Not Particularly Innovative	Not Innovative
Institutional	23%	69%	8%	0%
Programmatic	11%	66%	21%	2%

<sup>1</sup> “Substantive change” is a phrase used by the federal government in its periodic review of accrediting organizations. As used by government, the phrase may or may not include innovation.

**Exhibit 2. Frequency of Review of Substantive Change Procedures**



residential programs, changes in curriculum, changes in governance, changes in clinical affiliates, new parallel curriculum tracks and new campuses.

Institutional and programmatic accreditors also differ in use of standards and policies related to innovative offerings. Whereas 23 percent of institutional accreditors reported that they have separate standards or policies for accommodating offerings like competency-based education, four percent of programmatic accreditors responded that they have separate standards or policies for innovative offerings in most cases. Further, 31 percent of institutional accreditors and seven percent of programmatic accreditors indicated that they have separate standards or policies for innovative offerings in some cases. These findings are illustrated in Exhibit 4.

### Majority of Accreditors Do Not Review Nontraditional Providers

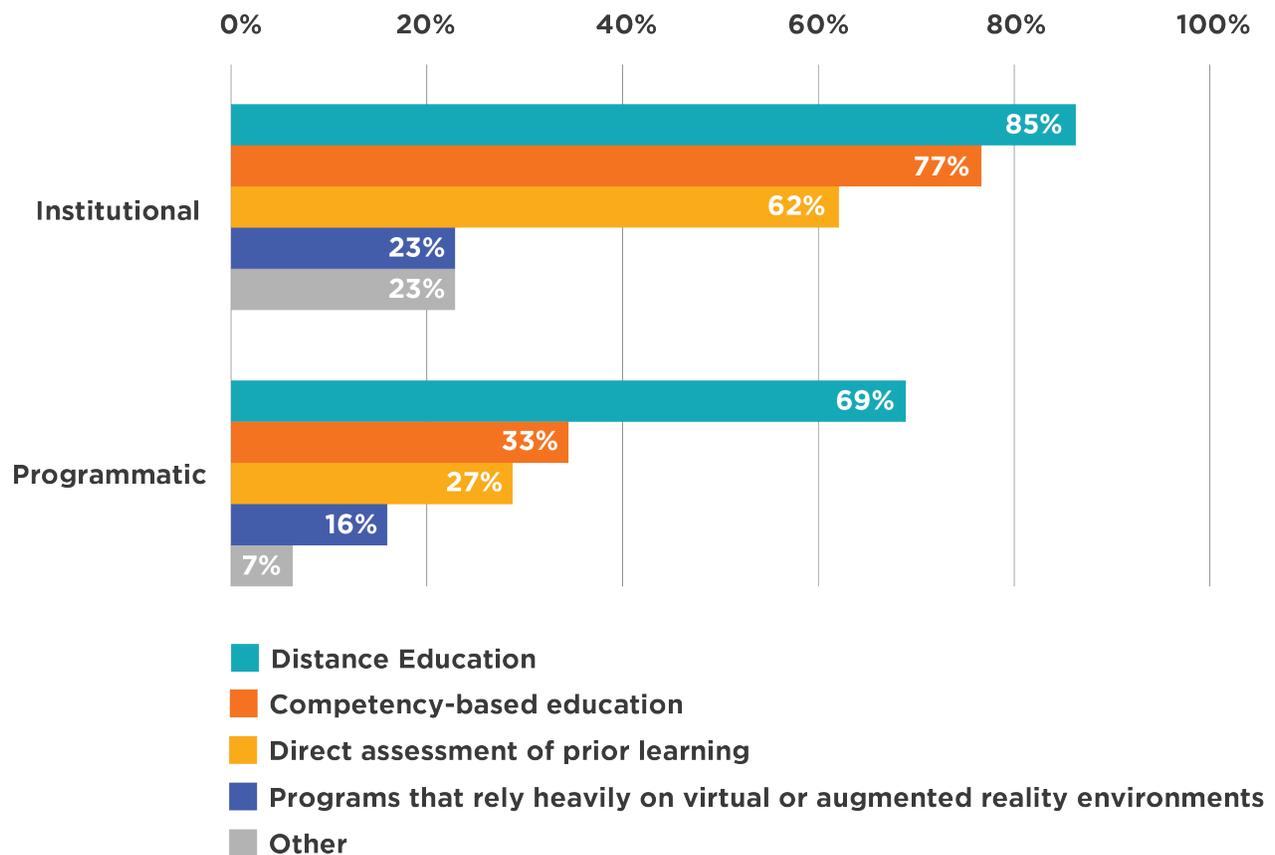
The survey asked accreditors if they review or provide accreditation of nontraditional offerings of higher education (e.g.,

partnerships between traditional institutions and companies that offer education such as stand-alone, non-institutional providers and providers of nontraditional credentials). Exhibit 5 shows 62 percent of institutional and 83 percent of programmatic accreditors do not review or accredit nontraditional providers of higher education.

Of those accreditors responding that they do engage with nontraditional providers of higher education, examples reported included review or accreditation of massive open online courses (MOOCs) and coding boot camps, review or accreditation of partnerships between traditional and nontraditional providers, residency programs in non-institutional settings and stand-alone schools not related to a larger college or university.

Finally, when accreditors were asked if they plan to expand the scope of accreditation activities beyond traditional higher education settings, a majority of both institutional (75 percent) and programmatic (79 percent) accreditors reported they do not plan on expanding (Exhibit 6).

**Exhibit 3. Types of Offerings Currently Included in Accreditation Reviews**



### Accreditors Make Changes to Standards to Accommodate Innovation and Outcomes

The survey asked accreditors about changes to accreditation standards. Seventy-five percent of institutional accreditors reported they had revised standards to accommodate recent innovations in higher education in the last five years, compared to 44 percent of programmatic accreditors. Half of institutional accreditors revised standards to be more focused on educational outcomes, compared to 69 percent of programmatic accreditors. Half of institutional accreditors revised standards to require more evidence that outcomes are being achieved, compared to 67 percent of programmatic accreditors. A quarter of institutional accreditors decreased the number of standards for which institutions or programs are accountable compared to 16 percent of programmatic

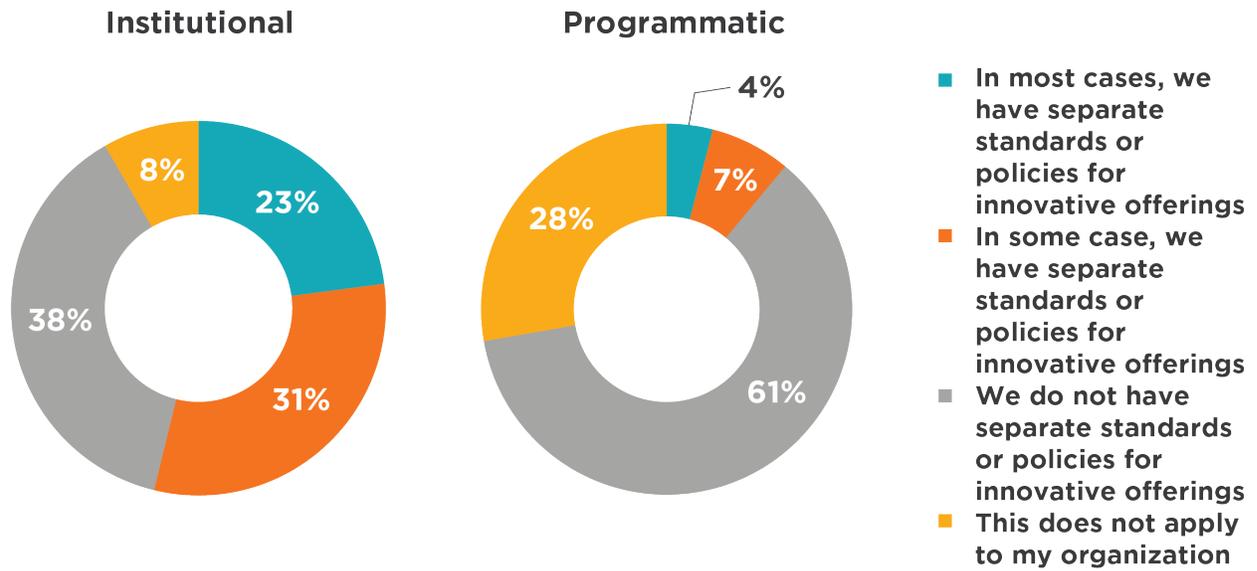
accreditors.

Seventeen percent of institutional accreditors and nine percent of programmatic accreditors made other broad changes to their standards, for instance, looking at student-centered accreditation; revising standards to ensure a balance between outcome-based and input elements so that licensure boards have a standard to use for accepting accredited programs; and developing and implementing doctoral standards for entry into practice. These findings are illustrated in Exhibit 7.

### Top-Reported Drivers of Innovation in Higher Education Include Labor Market, Demographics and Cost; Barriers to Innovation Include Regulation and Funding Constraints

Institutional accreditors indicated the top drivers of innovation in higher education as:

**Exhibit 4. Likelihood of Separate Standards or Policies for Innovative Offerings**



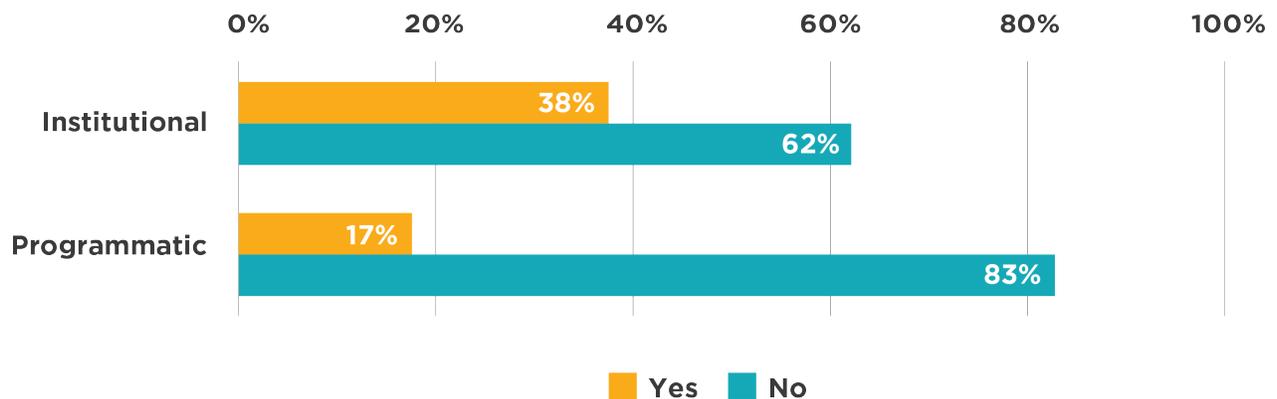
1) changes in employer/workplace demands, 2) changes in student demographics, 3) changes in economic demands for higher education and 4) concerns about sustainability. Programmatic accreditors indicated the top three drivers of innovation in higher education as: 1) changes in economic demands for higher education, 2) changes in student demographics and 3) cost of traditional higher education providers.

The survey asked accreditors what they considered to be the top barriers to innovation in higher education. Institutional accreditors indicated the top three barriers

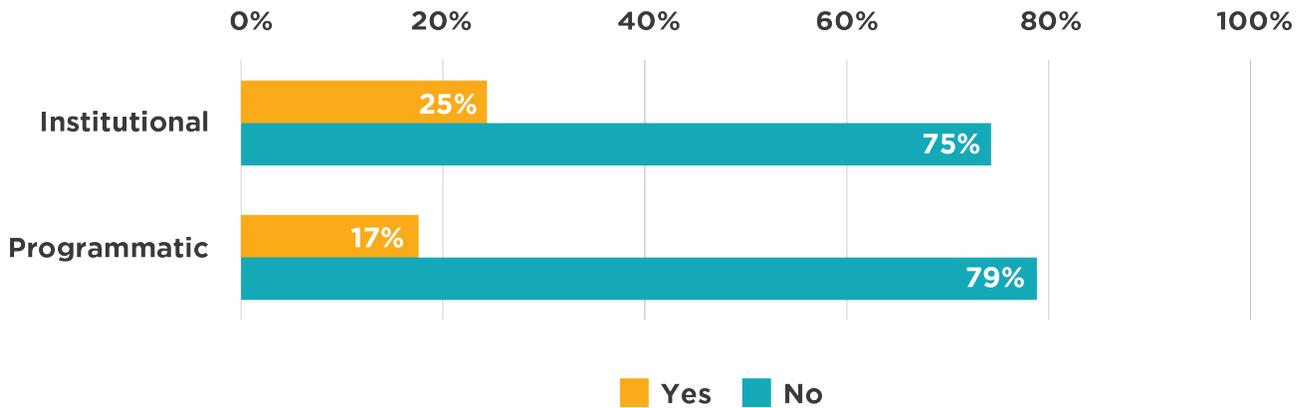
are: 1) federal regulation, 2) funding constraints and 3) the traditional higher education business model. Programmatic accreditors indicated the top three barriers of innovation in higher education are: 1) funding constraints, 2) changes in student demographics and 3) federal regulation.

The survey also asked accreditors to rate the degree to which different federal regulations impact innovation in higher education. Overall, institutional accreditors identified greater challenge with federal regulations than programmatic accreditors, with 92 percent of institutional accreditors

**Exhibit 5. Review or Accreditation of Nontraditional Providers**



**Exhibit 6. Plans to Expand the Scope of Accreditation Activities Beyond Traditional Higher Education**

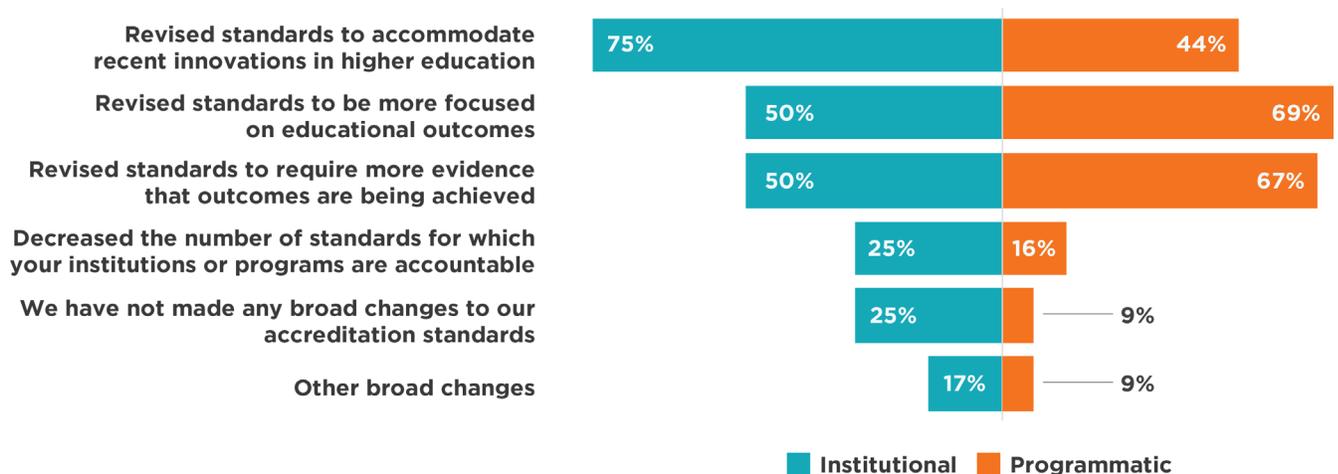


vs. 71 percent of programmatic accreditors identifying the provisions in Title IV of the Higher Education Act that governs accreditation as extremely or very challenging (Exhibit 8). Institutional accreditors identified the credit hour definition in federal regulation as the second most challenging category of federal regulation (73 percent extremely or very challenging), while 53 percent of programmatic accreditors identified the federal periodic review process as extremely or very challenging.

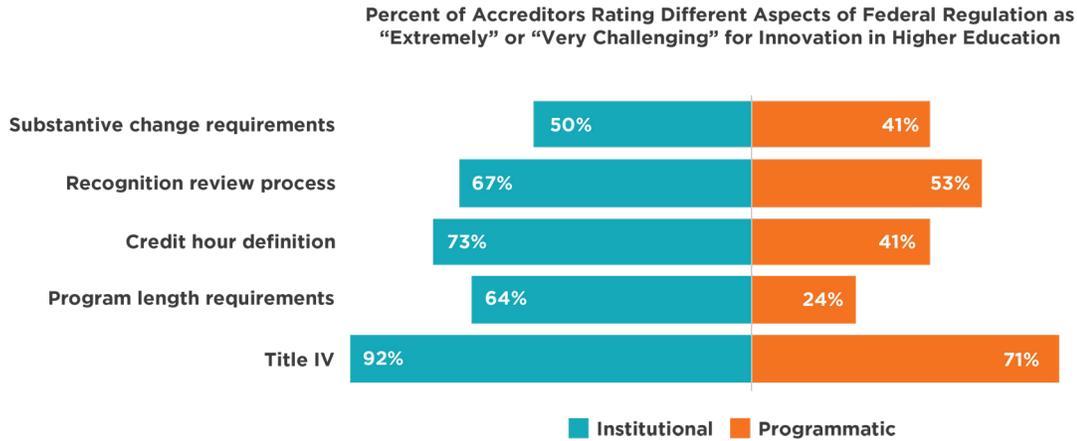
**Top-Reported Drivers of Innovation in Accreditation Include Demographics and Workplace Demands; Barriers to Innovation Include Regulation and Funding Constraints**

With respect to drivers of innovation in accreditation, institutional accreditors indicated their top three drivers are: 1) changes in student demographics, 2) changes in employer/workplace demands and 3) completion rates. Programmatic accreditors indicated their top three drivers of innovation in accreditation are: 1) changes in employer/workplace demands, 2) changes in economic

**Exhibit 7. Changes to Accreditation Standards in the Past Five Years**



**Exhibit 8. Institutional Accreditors' Views on Federal Regulation and Innovation in Higher Education**



demands for higher education and 3) changes in student demographics.

Institutional accreditors ranked their top three barriers to innovation in accreditation as: 1) federal regulation, 2) state regulation and 3) funding constraints and the traditional higher education business model. Programmatic accreditors indicated their top three barriers to innovation in accreditation are: 1) funding constraints, 2) federal regulation and 3) the traditional higher education business model.

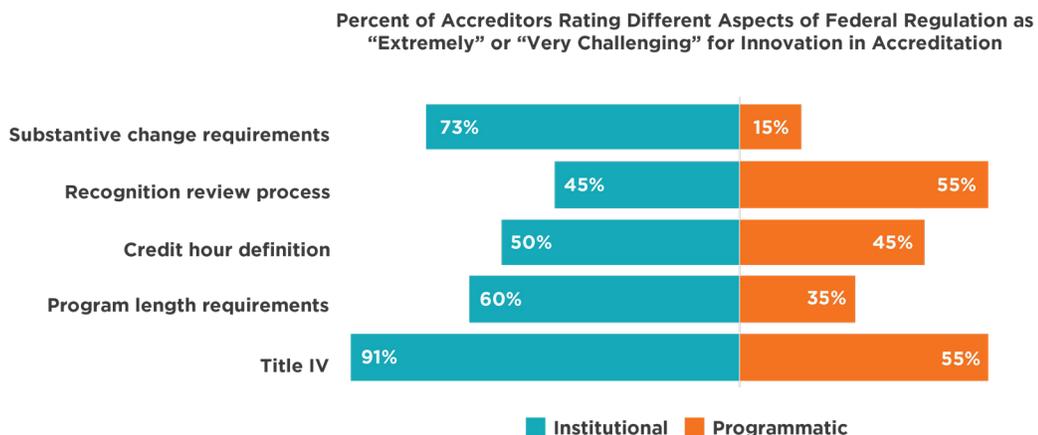
In response to further questions about the impact of federal regulations on innovation in accreditation, 91 percent of institutional accreditors indicated that Title IV is extremely or very challenging compared to 55 percent of programmatic accreditors. (Exhibit 9) Institutional accreditors cited substantive change requirements (73 percent) and programmatic accreditors cited the recognition review process (55 percent) as

the federal regulation presenting the next greatest challenge.

**Accreditors Shared Examples of Innovation Initiatives**

The final survey question asked accreditors to list the different types of innovation initiatives taking place at their organizations. Examples of those innovation initiatives from both institutional and programmatic accreditors are detailed in Exhibit 10.

**Exhibit 9. Institutional Accreditors' Views on Federal Regulation and Innovation in Accreditation**



**Exhibit 10. Institutional and Programmatic Innovation Initiatives**

Institutional Accreditors	Programmatic Accreditors
<p><i>“We have initiated a cohort sharing model to foster and encourage cross-collaboration between and among our member institutions. Members’ successful practices in topical areas are showcased in quarterly webinars.”</i></p>	<p><i>“We have an ‘exceptions and experiments’ policy that has allowed nearly 200 innovations in the past four years, with most focused on fully online programs, and several on competency-based programs.”</i></p>
<p><i>“We have simplified the substantive change requirements and processes and ensure a very quick turn-around on applications.”</i></p>	<p><i>“We approach any creative idea with the attitude of ‘let’s figure out how we can possibly make this work’ while fulfilling our fiduciary responsibilities as an accrediting agency.”</i></p>
<p><i>“Regular concurrent sessions at annual meetings where institutions share their innovations and discuss how that relates to accreditation requirements and/or the process of securing accreditation approval for such changes.”</i></p>	<p><i>“[We] instituted outcomes-based accreditation, which encourages the programs to set their own program educational objectives and student outcomes such that the institution and programs set their own goals, plans and means of meeting those goals. We show that we value innovation by providing awards for innovation and publicity for the same through [our] publications.”</i></p>
<p><i>“Benchmarking to focus on outcomes in context of student population and additional graduate rate measures to complement and avoid the limitations of IPEDS and get a more complete picture of grad rates.”</i></p>	<p><i>“Implementing a beta-version (cloud server based) accreditation management system that brings together all materials (standards, process, policies, and procedures and program reporting) and participants (programs, reviewers, accrediting body) in the process.”</i></p>
<p><i>“We have a \$500,000 Lumina grant to support our strategic plan with a major focus on innovation, thought leadership etc.”</i></p>	<p><i>“Our board consists of a variety of people from business to organizations to educators. This allows for exchanges of ideas from a variety of individuals/groups.”</i></p>
<p><i>“A focused accreditation process for schools that satisfy a set of basic criteria for meeting standards consistently over time as well as an incubation policy for institutions creating innovative programs that seek to be independently accredited after launch.”</i></p>	<p><i>“Our organization has recently created a task force on innovation to explore what our programs are doing in terms of innovative curriculum and delivery methods and how we can support those efforts. We are currently in the data gathering stage.”</i></p>

# Conclusions and Implications

In their responses to the survey, accreditors offered insights about how they engage in innovative practices during the accreditation process as well as how they encourage or support innovation in higher education. In general, accreditors believe they are enhancing and promoting innovative practices at the institution and program level. Accreditors also identified specific drivers and barriers to innovation, including federal regulation and the changing economy and labor market. The respondents also shared examples of current practices intended to foster innovation within the accreditor community.

Key takeaways grouped by institutional and programmatic accreditors are summarized below.

## Institutional Accreditors

Most institutional accreditors reported being moderately innovative with their accreditation practices. All institutional accreditors cited their review of substantive change procedures at least every five years as a useful practice, identifying substantive change as an indicator or innovation. Nearly all institutional accreditors have seen an increase in the number of substantive change applications.

Most institutional accreditors (62 percent) reported that they do not currently serve nontraditional providers and a quarter of those indicated that they have plans to expand the scope of their accreditation activities beyond traditional higher education settings. The factors most cited by accreditors for driving innovation in higher education and accreditation were changes in student demographics and employer and workplace demands, whereas federal regulation was cited as the top barrier to both higher education and accreditation innovation.

## Programmatic Accreditors

Similar to the institutional accreditors, most programmatic accreditors reported being moderately innovative with their accreditation practices, with 96 percent indicating that they revise their substantive change procedures at least every five years or more frequently, and with 40 percent reporting an increase in substantive change applications in the last five years.

Eighty three percent of programmatic accreditors reported that they do not serve nontraditional providers. Further, 20 percent of those not currently serving nontraditional providers indicate plans to expand their activities past the traditional higher education setting in the future.

Regarding innovation drivers, programmatic accreditors cite changes in economic demands for higher education and changes in student demographics as top drivers of both higher education and accreditation innovation. They cite funding constraints as the top barrier to both higher education and accreditation innovation.

## Implications

These survey results offer a window into how accreditors see their role in fostering innovation within accreditation as well as higher education. The results suggest an opportunity for deeper discussion about what innovation means to accreditors, as well as the challenges accreditors believe they face as the higher education landscape changes to keep up with economic, demographic and policy demands.

While the vast majority of accreditors view themselves as innovative or at least moderately innovative in their accreditation practices and many have revised their standards to accommodate recent innovations, the majority do not currently review nontraditional providers of higher education nor do they plan to expand their scope of accreditation activities to include nontraditional providers.

What is considered innovative may vary from institution to institution, program to program

and accreditor to accreditor. The ability of institutions, programs and accreditors to keep pace with changing demands for access, completion and student-centered outcomes will require continued innovation and conversations about innovation.

## Research Considerations for the Future

Innovation within higher education and accreditation are key areas in which CHEA will continue to promote the strengths of accreditation. CHEA's research efforts will support cooperation and sharing across the accreditation community to advance the use of innovation at programs and institutions as well as consideration for how they are reviewed for quality.

### How Can Accreditors Play a Role in the Quality Review of Alternative Providers?

Responses to this survey of accreditors demonstrate that the majority of institutional and programmatic accreditors do not engage with nontraditional providers of higher education. Those that currently do, however, may be in a position to share their experiences and lessons with their peers.

### Are Separate Standards Needed to Accommodate and Assess Innovation?

There are different interpretations of what is innovative, in part because there are many types of innovation to consider. The varied landscape – e.g. innovation within traditional institutions, partnerships between such institutions and alternative providers, stand-alone credentials – may demand different approaches and standards.

### What Do Substantive Change Applications Tell Us About Innovation?

Accreditors reported an increase in substantive change applications and appear to view substantive change as a

form of innovation. Understanding the trends emerging across substantive change applications could help with anticipating the impact of future innovations.

### To What Degree is Innovation Shaped by Federal Regulation?

The majority of accreditors reported that federal regulation can pose a barrier to innovation for accreditation, yet some are reviewing programs using educational technology such as virtual reality. As accreditors await new rules from the USDE, an assessment of what innovation fits within current regulation and the anticipated framework would be beneficial.

### How Does Innovation Support Student Success?

As accreditors address innovation in the near future, it is with the understanding that innovation can support improved student and institutional outcomes. Moving forward, accreditors will need to examine the relationship between innovation and strengthening student success.





Council for Higher Education Accreditation — serving higher education, students and the public through advocacy and leadership in assuring academic quality through accreditation.

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