Views

Open Letter to Senator Harkin

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By Judith S. Eaton

Dear Senator Harkin:

The Council for Higher Education Accreditation (CHEA) has carefully followed the Health, Education, Labor and Pensions (HELP) Committee hearings on for-profit higher education, especially as attention has focused on accreditation. As a national institutional membership organization charged with coordination of nongovernmental accreditation, CHEA has also paid close attention to Congressional concerns about the credit hour and accreditation as reflected in Representative George Miller’s hearing this past summer and Senator Richard Durbin’s recent request of accrediting organizations for information about completion, retention and student defaults, among other issues.

A single message is emerging from the Congress in these inquiries: based on examining a small number of institutions and actions by accrediting organizations, members of Congress appear to have determined that the entire accreditation enterprise is failing to do its job.

How did we move so quickly from identification of a modest number of concerns to a wholesale condemnation of the accreditation enterprise? How is this judgment warranted? While we must address the concerns that have been raised, are we on a path that could, at the same time, significantly diminish the value of accreditation to students, society and government?

Issues that members of Congress have identified over the past year require careful and immediate attention from educational institutions and accreditors. These have included allegations of aggressive and misleading recruitment practices, misleading marketing, inadequate persistence, completion and graduation, and rapid enrollment growth. We agree on important points:

- Some decisions made by accrediting organizations have been questionable.
- We are all alarmed about the combination of loan debt and failure to achieve educational goals for some students.
- Everyone is concerned about the need to assure reliable evidence of quality.
- Federal money should be available only to effective higher education institutions.
- The federal government has a legitimate interest in holding federally recognized accrediting organizations accountable.

However, we need some context. Some 7,400 institutions are accredited by recognized accreditors. Of these, attention has been focused on 15 campuses involving five of the 80 recognized accrediting organizations. Do members of Congress think that what has been found on some campuses applies to all of higher education? To all accreditation activity?
The Value of Accreditation

We believe that Congress is overlooking compelling evidence of the value and longstanding effectiveness of accreditation.

Accreditation has a long relationship with the federal government, serving as a reliable authority of academic quality and providing access to federal funds. Called "gatekeeping," this responsibility goes back to the 1950s. Would the government have continued to rely on accreditors for almost 60 years if these organizations had been perceived as incompetent?

Accreditation plays several important roles in U.S. society, in addition to assisting the federal government. State governments rely on accreditation when making judgments related to funding and licensure. The private sector depends on accreditation when recruiting graduates or providing funds for research or tuition assistance. Students and the public rely on accreditation to signal threshold quality and some likelihood of successful transfer of credit. From where have the decades of reliance come, if not from public confidence in accreditation?

Internationally, accredited status is the first and fundamental indicator that a U.S. institution or program has value. U.S. accrediting organizations are in demand and the U.S. process is replicated in many places around the world. Would this be the case if accreditation were the shoddy enterprise sometimes depicted?

We can avoid the hyperbole of "best in the world" and still point to the United States as sustaining one of the strongest, most effective and diverse higher education enterprises in the world, simultaneously providing extraordinary -- not perfect -- access and quality. No one is claiming that accreditation caused this to happen. But -- how can one deny that accreditation is part of this enormous success?

Accreditation is grounded in and reflects the core academic values of higher education: the importance of institutional academic leadership, the power and effectiveness of peer/professional review, and the centrality of academic freedom. These values are building blocks that have been essential to the success of the higher education enterprise mentioned above. Does it make sense to ignore this?

Building on this history, accreditation has also accepted responsibility for change. Responding to calls from the higher education community, government and foundations, accreditation is enhancing its transparency and strengthening its attention to student achievement. CHEA, through its publications, conferences and recognition process, has promoted these changes for more than a decade. There is progress here, even as the pace of change may be too slow for some.

It's About Accountability

CHEA is concerned that this wholesale condemnation of accreditation is part of an emerging approach to accountability on the part of government that, if fully implemented, will be problematic for students, colleges and universities and government itself. This approach dates from the 2006 report of the Secretary of Education's Commission on the Future of Higher Education and is based on what some members of the commission considered to be the limitations of both higher education and accreditation. The modest number of instances in which, arguably, institutions and accreditors in the for-profit arena have been lacking appears to reinforce the perceived wisdom of this emerging approach.

Until five years ago, government, through the U.S. Department of Education and the National Advisory Committee on Institutional Quality and Integrity, held accreditation accountable through evidence that (1) accrediting organizations set expectations of quality through their standards and processes, (2) institutions and programs worked to meet the standards and (3) accreditors would take action when standards were not met, up to and including denial or removal of accredited status. The federal government invested in this peer/professional review process because it was considered to be an
effective means to examine the academic operation of colleges and universities, whether curriculums, academic standards, faculty. The courts, in case after case, sustained this position of deference to professional judgment of quality by the academy. The system worked.

This system is vanishing. Accracker judgment is being augmented or supplanted by government judgment.

Government now questions whether simply holding accreditors accountable for having and maintaining standards and processes is sufficient. Officials are more and more inclined to decide the standards and processes for which accreditors are accountable. Government is taking a next step to determine the content and level of expectation of accreditation standards and how various accreditation processes are to be carried out.

There is a context for this shift. The large amount of money flowing into higher education is often cited as a primary factor in government’s expanded examination of colleges, universities and accreditation. Congress is appropriately concerned about the return on its major investment of federal financial aid dollars. Millions of students are receiving a total of $150 billion in aid on an annual basis. And, especially in today’s world of economic difficulty, there are many questions around funding higher education access unless there is a high probability of student success, usually defined in terms of completion, graduation or job acquisition. Other issues – international competitiveness and the importance of postsecondary education to the economic well-being of students and society -- are brought up as well.

It is reasonable to ask, however, whether this emerging approach to accountability is good for students, for higher education and for the country. Do we want Congress making decisions about the number of credit hours that students can earn, instead of faculty who have been making these determinations for generations? Do we want Congress, instead of academic administrators, attending to enrollment growth in individual colleges and universities? Do we want Congress, rather than governing boards of colleges and universities, scrutinizing executive compensation? Why is Congress, not the decision-making commissions and councils, designing accreditation appeal processes?

We are addressing the serious concerns about a small number of institutions and accreditation actions. However, this does not require an approach to accountability that can fundamentally undermine the worth of accreditation and destroy its value to students, society and government.

Thank you.

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