

A FRAMEWORK FOR ACTION

PUBLIC HIGHER EDUCATION SYSTEMS AND ACCREDITATION - EFFECTIVE PARTNERS FOR CHANGE WITH QUALITY¹

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INTRODUCTION

Higher Education in the United States is complex and decentralized. Unlike many other countries, the United States has no ministry of education, leaving considerable authority for public higher education to the states. Given that institutions within public systems enroll over half of all students attending higher education, the role of systems is fundamental to the quality of higher education. Likewise, the accreditation system is complex, with accreditors responsible for quality assurance and quality improvement at the institutional level and in many professional fields at the programmatic level. While accreditors are non-governmental entities, many are “recognized” by the U.S. Department of Education to provide access to federal financial aid for students and assure accountability. Accreditors of institutions and of some programs are membership organizations, giving them close connections with colleges and universities, but not *de facto* connecting them with systems.

Given that: 1) every public system is different, depending on its size, authority and responsibility; and 2) there are many programmatic accreditors pertinent to public higher education, the challenge of communication and cooperation between public systems and accreditors is inherently complicated. To be helpful, an advisory framework for systems and accreditors should be practical and flexible.

This framework is developed to assist public higher education systems and accrediting organizations working together, both on a routine basis and when significant changes are contemplated or planned by either party. The framework identifies essential elements for an effective partnership and may also be useful for working with other key actors, such as state and federal government officials.

Circumstances driving challenges to systems include: demographic shifts, reductions in state support, changing workforce demands and public expectations for higher education, catastrophic events such as the COVID-19 pandemic, and shifting organizational and business models. These changes can affect the accredited status of both institutions and programs within a system and the ongoing relationship among systems and accreditors subsequent to any restructuring or operational modifications. An effective partnership for change is essential.

¹ The framework was developed as part of a Lumina Foundation grant to the Council for Higher Education Accreditation, Judith Eaton (president *emeritus*), to host a meeting of executives of public higher education systems and accrediting organizations, working with Barbara Brittingham (president *emeritus* of the New England Commission of Higher Education) and Sally Johnstone (President of the National Center for Higher Education Management Systems).

The coming decade is likely to be one of significant change both for systems and for accreditors. For systems, this will include changes in enabling legislation, multi-institutional academic programs, institutional mergers, centralization of services, outsourcing of key functions, and acquisition of auxiliary enterprises (related, e.g., to capacity for offering education online). In some cases, accreditation of the system, rather than individual institutions, may be considered. For accreditors, changes will include revised standards, new policies, mandates arising from the re-authorization of the Higher Education Act or recognition requirements by the U.S. Department of Education, alterations in the recognized scope of accreditation, and changes in professional fields and public expectations. The above changes for systems may well have implications for accreditors, and likewise, the above changes for accreditors may have implications for systems and their constituent institutions.

This framework is the product of consultation with executives of public systems and institutional and programmatic accrediting organizations during fall 2020. Following a series of individual and small group meetings, the consultation culminated in a virtual meeting of all participants in December 2020. Participants stressed the need for mutual understanding in three key areas: (1) reflecting on what counts as fiscal sustainability, given the variation in systems and institutions, (2) assuring effective communication between systems and accreditors given the diversity of missions, as systems and their institutions undergo these changes; and (3) assuring clarity about flexibility and nimbleness from both partners. A list of these individuals is available at the end of this framework.

THE FRAMEWORK

1. Develop mutual understanding. Understanding the role, structure, and functions of the other parties is an important first step; this includes understanding the context and legal environment of systems and accreditors.
 - For accreditors getting to know the system: What is the role and authority of the system vis-a-vis the accredited institutions and programs? Is the system board a governing board or a coordinating board? What is the authority of the board, and what are its responsibilities?
 - For systems getting to know the accreditor²: What is the scope of accreditation offered by the accreditor? What federal regulations or licensure requirements are relevant? What changes that could be contemplated by the system would need (prior) approval by the accreditor?
 - For both accreditors and systems: What are the best ways to support regular communication? For accreditors, what changes that a system could make would be considered major changes? Likewise, for systems, what changes that an accreditor could make would be considered major changes?
2. Identify suitable ways for continuing communication. Context is important here; there is no single formula for a best communication plan. This may be the most

² For general information about accreditation, the website of the Council for Higher Education Accreditation offers a wide range of resources. See: <https://www.chea.org>

complicated – and arguably the most important element – given the variation in systems, the variation in regional and national accreditors, and variation in professional accreditors.

- For both accreditors and systems, regarding plans and decisions, key questions of the other party are “What can we know, when can we know it, and when might changes be implemented?”
 - Accreditors typically ask each institution or program to identify a person, sometimes called an “Accreditation Liaison Officer,” whose responsibility is to be one principal point of contact with the accreditor, to be sufficiently senior in role to know when the institution or program is contemplating or planning changes that will require the attention and perhaps prior approval of the accreditor, and generally serve, in addition to the President or head of a program, as a principal point of contact.
 - Possibilities for continuing communication include adding system/accreditors to mailing lists, presentations at conferences and professional development sessions, annual or semi-annual meetings, designated point-of-contacts with regular check-ins, and including systems on distribution of accreditation decisions. [Also see #4 below.]
3. Look for value added. What information would the system find useful to have from the accreditor about its accredited institutions and programs? Are there ways the accreditor can be helpful to the system? Revision of accreditation standards, for example, affords the system not only the opportunity to weigh in on the essential elements of quality, but also a chance to learn what the broader higher education community sees as key changes in the elements of quality in institutions and programs.
- How can the system best gain value from the accreditor’s processes? How can the system be helpful to the accreditor?
 - How can the accreditor best gain value from working with the system? How can the accreditor be helpful to the system?
4. When significant change is contemplated or planned, develop a plan for coordination. For systems, significant change might involve combining institutions; deep centralization of services; pending legislation to change the charter of the system; or significant decreases in public funding likely to lead to basic changes in the system or its constituent institutions. For accreditors, significant change might involve a revision of the standards, proposals of policies, or procedures that could have a significant impact on public institutions or systems. The system or accreditor contemplating or planning such a significant change should contact the counterpart to address:
- How are we assuring that such coordination is in the interest of service to students?
 - What is the nature of the change, to determine its significance and how it might have an impact on the other party?
 - Are there third parties that are important in the process? If so, how should they be involved?

- What is the timeline and proposed process? How do the timelines of the parties work together?
 - Are there significant issues or problems identified that should be addressed?
 - Who are the points of contact to manage the relationship and processes during the change?
5. Periodically review and evaluate the working relationship. Given the anticipated rate of change in higher education and the increasingly important connections between public systems and accreditors, assessing the relationship from time to time can add value.
- Is communication at a level to be useful but not burdensome, avoiding surprises and finding useful avenues for collaboration?
 - Are the goals for value added for each party (see #3, above) being fulfilled?

With this shared understanding, systems and accrediting organizations have a foundation to move forward as systems undergo major changes and continue to meet accreditation requirements.

PARTICIPANTS

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3. Darla Coffey, President and Chief Executive Officer, Council on Social Work Education
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5. Larry Earvin, Chief of Staff, Southern Association of Colleges and Schools Commission on Colleges*
6. Blake Flanders, President and CEO, Kansas Board of Regents
7. Barbara Gellman Danley, President, Higher Learning Commission*
8. Dan Greenstein, Chancellor, Pennsylvania State System of Higher Education
9. Mary K. Hughes, Regent, University of Alaska Board of Regents
10. Harrison Keller, Commissioner of Higher Education, State of Texas
11. David Lassner, President, University of Hawaii System
12. Todd Leach, Chancellor *Emeritus*, University System of New Hampshire
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16. Heather Perfetti, President, Middle States Commission on Higher Education*
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18. Larry Schall, President, New England Commission of Higher Education
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PROJECT CO-DIRECTORS

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**For the Higher Learning, Middle States and Southern Commissions, one individual attended a small-group meeting and another attended a large-group meeting.*