



The Future of Accreditation?

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With Congress poised to renew the Higher Education Act, the push for accountability has opened the door to proposed federal changes to accreditation of higher education. If not properly countered, federal accountability demands will set us firmly on a path where self-regulation of academic quality through accreditation is significantly diminished by government regulation. We will experience a shrinking of the presence of accreditation. If confronted with our situation, Alice in Wonderland might have said: "Self-regulation is, after all, just government regulation that I like."

It was the year 2014 and the shrinking of accreditation was complete. Self-regulation through voluntary accreditation had almost disappeared from the higher education landscape. It had been replaced with federal control of thousands of U.S. colleges and universities.

Just as the 2008 amendments to the Higher Education Act (HEA) enlarged the footprint for federal control over higher education, the 2014 amendments enabled the government to erase accreditation as an arbiter of quality from federal statute. Congress removed the standards for recognition of accreditation from the law and shut down the federal advisory committee that reviewed the accreditors, halting the 60-year federal reliance on the enterprise as a gatekeeper of federal funds. The voluminous regulations that accompanied the law and certified the reliability of accrediting organizations were rescinded as well.

How It Happened

How did this take place? Voluntary accreditation was undermined by a public that now vested greater authority in government judgment about performance of colleges and universities rather than accreditation, a nongovernmental, rather obscure and "private" source of judgment of quality that had come to be viewed as inadequate. The press and elected officials, increasingly reflecting public sentiment, were routinely describing accreditation as insular and, at times, even arrogant in its lack of full transparency and responsiveness to the public.

Accreditation, which had claimed the mantle of primary authority on higher education quality for many years was, above all, diminished by the public accountability movement that had roots in the 1980s. This demand for accountability reached a crescendo toward the end of the George W. Bush presidency (2000-2008), with the federal Secretary of Education's [Commission on the Future of Higher Education](#) in 2005-2006 and subsequent activities in 2007. The twin themes of the commission's report and attendant activities -- the inadequacy of accreditation and the consequent need for additional government control of quality -- coincided with the culmination of efforts to reauthorize the HEA that had been under way since 2003 and was completed in 2008.

The reauthorization now incorporated much of the thinking of the commission, setting the stage for the diminution of accreditation and the assertion of federal control of higher education.

The federal government, by establishing an alternative system of quality judgment that had immediate credibility with the public, eclipsed the need for accreditation. The key element was the replacement of accreditation standards with government standards for quality, comparable in a number of ways to the 2002 No Child Left Behind Act that established government expectations for success in elementary and middle schools. Accreditation could no longer compete.

Institutions, to their credit, did try to sustain their considerable loyalty to accreditation.

But, in the end, they could not continue to invest in the process. College and university presidents had conducted a cost-benefit analysis that made it painfully clear that future perceptions of their institutions rested more and more with judgments emerging from government scrutiny, not accreditation. The accreditation process that institutions had undergone for years - self-studies, site visits, peer review and collegial system of careful judgments about quality – no longer provided a significant return on investment.

Higher Education and Accreditation React

Looking back, it was clear that colleges, universities and accreditors underestimated the persistence and intensity of calls for greater public accountability. Despite a series of valuable and important initiatives in this area, higher education's otherwise compelling and forceful responses did not match the urgency of the accountability demands.

And, in a number of instances, higher education institutions and accreditors had remained emphatically resistant about public accountability. They often disagreed with government about the appropriate tools needed to address this vital subject. From the perspective of many educators, current approaches to accountability often rested on either erroneous assumptions or inadequate evidence or poor methodologies. This was simply unacceptable when addressing such complex and nuanced issues as institutional performance and student achievement.

Accountability that was mandated also did not sit well with higher education and accreditation leaders who firmly believed that it had to be addressed voluntarily. The result was a good deal of higher education discussion and activity to address accountability dating to the 1980s, but not enough robust action to fully engage public demands.

Compounding the problem, some institutional and accreditation leaders were no longer fighting for the privilege of self-regulation. Perhaps self-regulation was simply taken for granted. Perhaps it had been a fundamental feature of higher education for so long that it had become invisible. Whatever the reasons, leaders tended, less and less, to make the case for self-regulation as the responsible exercise of a coveted independence and self-determination for the academy, especially in academic matters.

In retrospect, it would have been helpful if more academic leaders had publicly re-affirmed the importance of self-regulation. It would have been valuable to emphasize that the resultant academic independence was at its best when serving the public interest. In the face of the accountability challenge, failing to provide powerful advocacy for self-regulation that went

beyond “self” resulted in higher education surrendering one of its most precious assets: the public trust vested in its institutions for leadership in academic quality.

Moreover, the long-held distinction between self-regulation and government regulation was beginning to blur. As early as the beginning of reauthorization of HEA in 2003, some institutions and accreditors appeared more and more comfortable defining “self-regulation” as “government regulation that we like.” They were ignoring the vital importance of locating responsibility for academic quality and direction with the leadership of colleges and universities. Institutions and accreditors demonstrated, over and over again, that they were willing to allow government to step in, trumping institutional leadership when it came to prescribing academic quality. This was clear during the 2007 negotiated rule making on accreditation where some of the members of the panel from higher education and accreditation supported government efforts to add regulatory language that strengthened the federal role in setting expectations of student achievement, a responsibility that historically rests with institutions.

The impact, however unintentional, was a transition from government holding higher education and accreditation responsible for producing quality institutions and programs to government prescribing what counts as quality and thus regulating higher education. It was one thing, for example, when the government requires that institutions report graduation rates of students and quite another if the government actually stipulates acceptable graduation rates for all colleges and universities.

In short, the demand for greater accountability pressed higher education and accreditation to assure the public that self-regulation was rigorous, transparent and accountable. However, in the years following the 2008 reauthorization, it was clear that the public was not assured.

How Did Accreditation Shrink?

The Federal Government Took Action

To replace accreditation standards, the federal government went on to develop four tools to judge academic quality: (1) a data collection tool to expand information on institutional characteristics and results, (2) a tool of government benchmarks of academic quality, (3) a U.S. Qualifications Framework and (4) a national ranking system for all colleges and universities.

Using the authority that the government gained in the 2008 reauthorization, the Department of Education created its data collection tool by requiring that institutions submit significantly enriched data on institutional performance – not only graduation, but also, e.g., transfer, job placement and entry to graduate schools. By 2009-2010, the government was using these expanded data to develop cut-off points or “bright line” indicators to make judgments about institutional quality. There were now government-required levels for many areas of institutional performance. These data were also to be used to populate the government qualifications framework and rankings.

By 2011, a U.S. Qualifications Framework was complete. It created a lockstep approach to student achievement with expectations of specific competencies aligned with each degree level (associate, baccalaureate, masters, doctorate) offered by an institution. The federal qualifications framework took its place beside those already established by a number of other countries and regions, e.g., China, India, the European Union and some Canadian provinces. The framework, more than any of the other tools, essentially standardized national expectations

about higher education quality. Finally, by 2012, the federal government, modeled on *US News and World Report*, had also completed a ranking system for all institutions.

The federal government also assured that the public could easily access the framework and rankings, as well as customize the data for its own use. Building on the models of the “College Navigator” mounted by the Department in 2007 and the “Mapping America’s Education Progress” for elementary and secondary education in 2008, the Department Website, as of 2012, included a search engine for all higher education institutions that anyone could use to find and rank institutions by academic quality indicators as well as by, e.g., type of institution, size, budget, and financial aid to students. Prospective students, the press and the public could readily access these sites and make their own independent judgments of what counted as a quality school.

By 2014, these tools resulted in government judgment about quality as the primary driver of federal funds, now totaling some \$150 billion annually, to thousands of colleges and universities through student grants and loans as well as research and program funds. From now on, these federal dollars were conditioned on the respective performance levels of institutions as determined by the government, including adherence to the U.S. Qualifications Framework and positioning in the federal rankings scheme. Only institutions with government-defined “acceptable,” e.g., graduation rates and transfer rates were eligible. These institutions also had to document government-acceptable rates of entry to graduate school and job placement.

State Government Moves as Well

State government, responding to the tools developed following the 2008 reauthorization and reacting to 2014, also replaced accreditation, using either the federally generated quality judgments or rankings or establishing state indicators, qualifications frameworks and rankings. States discarded accreditation when deciding whether an institution could operate in their respective domains. For many states, the movement to indicators, frameworks and rankings was quite straightforward, building on their many years of state performance budgeting and performance reporting for public universities that went back to the 1980s. The scope of state authority was greatly enlarged, however, with thousands of nonprofit and for-profit private institutions also included in these requirements as a condition of being licensed to operate.

State licensure of individuals in the professions also ceased to rest on whether or not the programs from which students graduated were accredited. Rather, states now required that programs such as law, medicine and other licensed professions no longer be based upon accredited status, but on program performance as measured by federal or state indicators, including whether graduates met the expectations of competencies captured by qualifications frameworks, or the positioning of programs in national or state rankings. States also conditioned their mutual reciprocity with regard to licensure, agreeing to acknowledge each others’ licensure of professionals only if the states from which the professionals came used either the federal or state quality standards.

Employers and Foundations Change Course

Following the lead of the public sector, many private employers and foundations abandoned the requirement that institutions sustain accredited status for a demand that institutions meet specific federal or state benchmarks for performance as a condition of providing, e.g., tuition assistance or awarding grants. This shift affected millions of employees in computer and

electronic fields, the automotive industry and many service industries. The private foundations that had long favored higher education with research and program funding based on accredited status now replaced this demand with requirements for evidence of how well institutions fared with regard to federal or state indicators and rankings as a condition of receiving foundation funds.

Accrediting Organizations as Enablers of Government Control

Some of the 81 recognized accrediting organizations that were active in 2008 closed their doors within several years of the establishment of federal quality standards and, ultimately, the federal government's abandoning of the gatekeeping role. Others continued to operate, but fundamentally retooled.

Accrediting bodies transformed themselves from arbiters of higher education quality to providing audit and consulting services to colleges and universities. They became enablers of government control of quality. Institutional accreditors assisted colleges and universities in the data collection required by the federal government. They provided advice to institutions about how to analyze and use these data to showcase college and university efforts. They provided consulting assistance to establish profiles of excellence based on government indicators.

In a similar vein, programmatic accreditors, instead of supplying the standards that drove, e.g., law, medicine, business and many other professions, now worked with programs to meet state or federal standards that were aligned with state licensure requirements. They provided technical assistance to programs needing data collection and analysis and, as with institutional accreditors, worked with programs to establish profiles of excellence that would be affirmed by government review.

Shrinking Accreditation Did Not Improve Higher Education Quality

While government was successful in establishing this new system of quality judgments, this did not, contrary to public expectations, translate into additional success for higher education. Standardization of quality expectations and emphasis on transparency under government control did not, as many had anticipated, launch a new era of blossoming higher education quality. To the contrary, the new government-directed quality standards, with increasing bureaucratic emphasis on a single set of performance levels, coincided with an era of declining success in higher education. The government-based accountability brought U.S. practice closer to the ministerial approaches of many other countries. At the same time, however, U.S. institutions did not fare as well as in the past when compared to international colleagues.

As voluntary accreditation withered and government control flourished, U.S. higher education increasingly lagged beyond many other nations in academic standing, participation, success with degree attainment, innovation in teaching and success in research. Gone were the days of international leadership and successful competitiveness of a U.S. higher education enterprise that once was routinely described as "the best in the world." Gone was the conspicuous and often overwhelming presence of U.S. institutions in the major international rankings of higher education such as the Shanghai rankings and the *Times Higher*.

Did the shrinking of accreditation serve the public interest? No. It was clear, by 2014, that public accountability, however valuable and desirable as an end in itself, was not a driver of academic quality. It was clear that replacing self-regulation through accreditation with government regulation did not enhance academic quality.

Above all, it was clear that, absent additional energetic action about accountability on the part of higher education and accreditation, the shrinking of accreditation could actually occur.

Bio

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