

The Changing Role of Accreditation: Should It Matter to Governing Boards?

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TAKEAWAYS

- 1 Accreditation is changing in three major ways. It has become more visible, inviting additional public scrutiny and attention. It is increasingly government controlled, serving more and more as an instrument of government policy. And it is being challenged to respond to the latest wave of innovation in higher education.
- 2 Accreditation has had little competition—until recently. Today, students and the public have many options for judging a college or university, and boards must anticipate how such second opinions about quality affect board decision making.
- 3 New and emerging demands will require boards to spend more time on—and have a deeper understanding of—accreditation issues as they relate to their particular institutions.

ACCREDITATION'S ROLE IS CHANGING IN WAYS THAT will affect governing boards, as the institutions they oversee face new types of campus reviews. Accreditation will take more time and attention in the future. It will be more demanding. In some ways, accreditation will involve greater risk.

Governing boards are usually somewhat familiar with accreditation, typically because members have been engaged in some way with a campus accreditation review—a process that takes place every several years, whether at the institutional or programmatic level. Boards know that maintaining accredited status is necessary for their institutions to be eligible for federal funds, student grants and loans, and research or program money. They are aware that the absence of accreditation is problematic. Because accreditation is higher education's primary means to assure and improve the quality of colleges, universities, and programs, boards know that accreditation is, in many circumstances, essential.

Three particular changes, however, are affecting accreditation's role today. First, accreditation has

become more visible, inviting additional public scrutiny and attention. Second, accreditation is increasingly government-controlled, serving more and more as an instrument of government policy and making accreditors, increasingly, actors in the political world. This has rendered accreditation more vulnerable to government directives and left accreditors less in charge of their own operations in dealing with accredited colleges and universities. Third, accreditation is being challenged to respond to the latest wave of innovation in higher education, just as institutions are. That carries significant implications for both campuses and accreditors regarding the mission, programming, and positioning of colleges and universities.

All of this means that, going forward, boards will need

to anticipate and address intensified scrutiny by the press and social media concerning accreditors' procedures and decision making. They will need to comply with the growing government demands that accreditors are obligated to enforce, and they must understand the impact of greater federal direction on how they make their own decisions. Boards must also understand the pressures for educational innovation and grapple with the implications of such innovation for their institutions' ongoing operations and for what constitutes "quality" in this new environment.

Accreditation and Greater Visibility

The past several years have seen growing criticism of higher education's cost and the less-than-impressive graduation rates at some institutions. Accreditors have been charged with, among other things, not being tough enough on institutions and for concerning themselves with detailed requirements that may not be related to how much students actually are learning and whether they persist to earn their degrees. Accreditation's visibility has grown as accreditors have responded to critics' calls for greater public accountability and transparency in their operations. In turn, as their work has become more and more public, it has drawn increasing comment and criticism in the press, including social media.

The growing press attention to accreditation is clear. According to my search of their websites, the online newspaper *Inside Higher Ed* published 70 stories on accreditation in 2005, 141 in 2008, and 223 in 2012. The *Chronicle of Higher Education* published 535 stories on accreditation during the last three years. More accrediting organizations now make reports of their accreditation visits public and provide, through their "action letters," detailed descriptions of how standards are met or not met. All of this information is now readily available electronically. Little of this disclosure was commonplace even five years ago.

Greater public attention to accreditation also means that boards can expect more scrutiny of their own operations—how members carry out their responsibilities and the board's relationship with the president, its structure, and its work with faculty through shared governance. Institutional accrediting organizations have standards and policies that address all of these areas as well as a board's fiduciary responsibilities. Accreditors expect evidence that such standards are met.

A governing board may have to manage a scenario in which its institution is fully accredited but then sees difficulties in some areas arise and become public—for example, in less-than-desirable student achievement—reflecting on both the accreditor's and the institution's judgments of quality. How will a board handle this? Boards will need to be prepared with appropriate state-

ments or comments about such difficulties, working with the president, alumni, and other supporters to try to contain, without defensiveness, negative comments in the press and social media, or other external scrutiny.

Moreover, in this era of increased public concern about academic quality, accreditation is no longer viewed as the only means of judging that quality. Accreditation has had little competition—until recently. Today, however, students and the public have many options for judging a college or university. There are any number of sources of second opinions.

To many people, ranking systems published by *U.S. News & World Report* and others are useful sources for assessing a college's quality. Another resource lies in increasing numbers of Web-based datasets that allow students and the public to easily compare institutions. The U.S. Department of Education's *College Navigator* Web site is one example, a place where students can compare institutions on factors such as graduation rates and student aid. The press, in its coverage of how accreditation is doing its job, also judges quality, publishing stories about accreditation actions framed as a debate between the accreditor and an institution. This is especially the case if an accreditor takes a negative action against a college or university (for example, placing an institution on probation or giving it a warning).

Boards will need to anticipate how such second opinions about quality affect board decision making. If a college or university adopts a goal of seeking to improve its position in one or another ranking, this decision can drive the distribution of resources and institutional priorities. How will these changes affect the capacity of the institution to meet accreditation standards? How does a board explain high rankings while, at the same time, receiving an accreditation report that contains a good deal of criticism? Poor rankings but a glowing accreditation report? How can an accredited institution have weak graduation rates or a large number of students who graduate with excessive debt, yet remain accredited?

Governing boards will need to manage the high visibility that now accompanies an accreditation review in this era of more open information, greater public scrutiny, and multiple, sometimes conflicting, opinions about quality.

Expansion of Government Oversight of Accreditation

Accreditation, especially over the past half-dozen years, has become a policy instrument and is more than ever part of the political world. The federal government has a large and growing financial investment in higher education and is expected to exert even greater authority over accreditation in the future, if past legislative history is any indication. The result is escalating government oversight

that is shifting accreditation from its historic mission of quality improvement to the role of being an agent for ensuring that institutions comply with government law and regulation.

Accreditation is addressed extensively in the federal Higher Education Act (HEA), most recently reauthorized in 2008, which also governs much of the federal funding directed to higher education. Some \$175 billion in federal funds goes to accredited higher education institutions each year, and those bodies that confer the accredited status themselves undergo periodic scrutiny by the U.S. Department of Education, through a process known as “recognition.” Accrediting organizations must be approved—recognized—by the department if the colleges or universities they accredit are to be eligible for federal funds. Although this tie to the federal government has been in place for some 60 years, accrediting organizations remain nongovernmental organizations.

First passed in 1965, the HEA must be reauthorized at least every five years, although it usually takes additional years to complete this renewal. Accreditation has been subject to federal oversight since 1952, and standards for federal review of accrediting organizations have been laid out in the HEA since 1992. The year 2013 marks the beginning of another reauthorization cycle, with some congressional hearings already underway and congressional action likely in 2014 or 2015.

During reauthorization—a high-water mark in the level of attention that Congress pays to accreditation—new laws are enacted and current law is expanded, immediately followed by a growth in the number of regulations needed to carry out new or revised provisions of the HEA. The reauthorization completed in 2008 especially targeted the area of academic judgment (related to curriculum, faculty, and academic standards) in higher education, an area that traditionally had been under the purview of faculty and academic administrators. Accreditation was the vehicle used to assert more control in the area of academic judgment, through provisions and regulations targeting the daily operations of accrediting organizations.

There are many examples of this targeting. HEA provisions and regulations now call for accreditors’ oversight of enrollment growth, distance learning, student achievement, and the determination of credit hours or the quantitative worth of a course, program, or degree. Similarly, various provisions direct the composition of visiting accrediting teams and accrediting commissions, as well as appeals processes and the use of legal counsel. None of these issues were found in law and regulation 10 years ago. We expect such oversight to continue to grow.

The latest reauthorization is beginning at a time when many people in Congress express unfavorable and sometimes harsh views of accreditation. We often hear,

“Accreditation is broken.” Or that “Accreditation needs to be fixed.” Others say, “Accreditation is not meeting society’s needs.” We hear calls for more attention to student-learning outcomes and for solutions to keep higher education affordable, usually prefaced by a comment that accreditation is an obstacle to innovation.

Another expansion of government oversight of quality may have taken place in August of this year—this time aimed at institutions, not accreditation. President Barack Obama called for a national rating system to judge the quality of higher education institutions and for establishment of performance-based measures for distributing federal student-aid funds. The judgment about the quality of an institution is now to be based on graduation rates, successful transfers between two-year and four-year institutions, graduates’ earnings, and the number of graduate-school degrees earned.

Accreditation was not mentioned in the president’s plan, and it is not clear whether this plan, if successfully developed, will be used in addition to accreditation or perhaps to replace accreditation. Whether accreditation might play some role with regard to the ratings system that the president envisioned is uncertain. What is clear is that the expectations in the plan vary greatly from the traditional indicators of quality to be found in accreditation, with emphasis on student achievement, on the rigor of academic standards, on the performance of faculty, and on the robustness of curriculum.

For governing boards, the expanding role of government in judging academic quality raises questions about the board’s traditional role in determining the strategic academic direction of an institution. Is board responsibility and authority for academic oversight diminishing? Is the faculty’s academic leadership being undermined? Is institutional responsibility for setting academic standards being overtaken by government-driven standards? How do boards carry out their commitment to a sound academic program when they are increasingly not free to judge the quality of that program on their own terms?

Governing boards can take a number of steps to address this expansion of government authority and to preclude any diminution of their role in providing oversight of academics, such as their judgment with regard to the growth of their institutions’ online education or international activities. These steps include undertaking an institutional audit to explore in what areas government regulations may affect a board’s role in supporting academic leaders and to look for ways to maintain that leadership in the future. Given the growing federal authority over higher education, we also need board members’ political action at the national level; we need more trustees to engage with members of Congress and officials in Washington, D.C. We need an institution’s continuing lobbying efforts to include strong advocacy for sustaining

the academic independence of colleges and universities and for an accreditation enterprise that remains focused on enhancing quality—not consumed by compliance obligations driven by government regulation.

Governing boards will need to manage the growing government influence over accreditation that is targeted on the academic activity of their institutions. This government influence continues to raise questions about the degree of freedom that boards have in making decisions regarding the strategic academic directions that their institutions pursue.

Innovation in Higher Education

A collection of educational innovations is making instruction of some sort available to great numbers of students—but from sources other than traditional colleges and universities. Typically, we are talking about short-term courses or other educational offerings that are online, do not carry credit, do not culminate in a degree, and are not accredited. These non-institutional offerings may be massive open online courses (MOOCs), other coursework offered directly by providers outside higher education, opportunities for competency-based education, and assessment of prior learning or “digital badges”—hyperlinked credentials that show a person has completed specific projects, programs, courses, and other activities.

MOOCs have garnered the greatest attention to date. Through companies including Coursera, edX, and Udacity—the major providers of MOOCs—online courses are being offered to millions of students worldwide, all outside traditional classrooms and apart from traditional courses. Supporters of MOOCs stress how they further democratize higher education through enhancing access. Detractors point to low completion rates, the lack of coherent curricula, the reinforcement of episodic education, and the lack of quality control. Other companies, such as StraighterLine and Saylor, offer their own coursework at low cost or for free. For \$99 a month and \$49 per course at StraighterLine, or by signing up for free courses from Saylor, students can enroll in a range of offerings from history to mathematics to information technology.

While efforts to document student skills using competency-based education and assessment of prior learning have been with us for decades, we are seeing renewed investment in those approaches. Two companies that have played large roles in this field, the Educational Testing Service and ACT, Inc., are strengthening their testing instruments and offering electronic certificates to document students’ learning outcomes. Mozilla has developed digital badges or electronic collections of documented skills to provide evidence of what students have learned.

Traditional colleges and universities have also been

involved in recent innovations. The platforms on which MOOCs rest are furnished with educational content often developed in cooperation with those institutions. A number are considering accepting MOOCs for credit or have already done so. Some of the direct course providers mentioned above have developed agreements with traditional institutions to award credit for free or provide low-cost offerings. Other institutions, led by the University of Southern New Hampshire, Capella University, and Northern Arizona University, are establishing competency-based programs leading to degrees, and students enrolling in some of them have been deemed eligible to receive federal student aid.

The accreditation community has just begun discussing the issue of quality for non-institutional providers. A survey of accreditors that my organization, the Council for Higher Education Accreditation (CHEA), conducted this summer indicated that, of the 84 recognized accreditors that were surveyed, 50 percent did not include non-institutional work as part of accreditation reviews. During an August 2013 CHEA webinar, accreditors affirmed that their work was confined to what traditional institutions were doing with regard to offering credit for MOOCs, direct coursework providers, competency-based education, or assessment of prior learning.

The current educational innovations underway challenge accreditation in two ways. They raise questions about the present range of accreditation activity and about the public perception of accreditation’s role in supporting and encouraging innovation. Should accreditation include scrutiny of providers outside colleges and universities? If governing boards move to take on some of these innovative activities, will accreditation be a help or a hindrance?

For boards, a myriad of questions about innovation will find their way onto meeting agendas. Should my institution offer MOOCs? What would such an investment involve? Should we enter into a partnership with private course providers? Accept digital badges as a foundation for awarding credit? Will the acceptance of non-institutional work affect our accreditation? If so, how? As MOOCs and direct providers of educational coursework attract significant numbers of students, will this affect enrollment at my institution?

Governing boards will need to manage the adoption and impact of current innovations on their institutions and gauge their effect on accreditation.

Moving Ahead

The additional public scrutiny that has become part of accreditation and higher education generally means that accrediting organizations, institutions, and boards need to come together to expand effective practices in working with the public. With regards to the growing role of gov-

ernment, CHEA will be collaborating with other higher education associations and accrediting organizations to make the case for preserving the essential aspects of traditional accreditation as vital to the future of academic quality, while sustaining commitment to public accountability. That means advocating for the need for academic leaders, not government officials, to judge educational quality. It also means reminding lawmakers of the vital role that accreditation has played in creating and sustaining the valuable and effective higher education enterprise that our country continues to enjoy.

The current focus on innovation challenges boards to give careful attention to how significant change can strengthen their institutions. At the same time, CHEA will be working with accrediting organizations to explore whether to expand scrutiny to include MOOCs and competency-based education alongside the long-standing traditional evaluation of institutions and programs. Alternatively, other accreditation vehicles may emerge, focused particularly on such innovations.

The bottom line is that the role of accreditation, like almost everything else in higher education, is changing. New and emerging demands will undoubtedly require boards to spend more time on, and have a deeper understanding of, accreditation issues as they relate to their particular institutions. ■

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T'SHIP LINKS: Judith Eaton, "What Does the 'Federalization' of Accreditation Mean for Boards and Institutions?" May/June 2011. Ralph Wolff, "New Roles, New Rules for Accreditation." September/October 2010.

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