

Planning for Higher Education

The Future of Accreditation

Can the collegial model flourish in the context of the government's assertiveness and the impact of nationalization and technology? How?

by Judith S. Eaton

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Background

Accreditation, the primary means of assuring and improving academic quality in U.S. higher education, has endured for more than 100 years. While accommodating many changes in higher education and society, accreditation's fundamental values and practices have remained essentially intact, affirming their sturdiness. Today, more than 80 organizations accredit more than 7,800 colleges and universities and 20,000 programs (Council for Higher Education Accreditation 2012).

Accreditation is a form of self-regulation—professionals reviewing professionals and academics reviewing academics. To carry out this process, nongovernmental, independent accrediting organizations were established, usually by professional societies or organizations of colleges and universities. The American Medical Association, created in 1847, began classifying medical schools in 1905. The New England Association of Schools and Colleges, established in 1885, adopted standards of membership in 1929 and initiated accreditation in 1954 (Brittingham 2009; Orleans 1975). Standards and policies were developed to judge institutions and programs on both threshold quality and quality improvement. Periodic review, ranging from every three to every ten years, became the norm. Self-regulation included a self-review against accreditation standards by each institution or program, followed by a peer review and then a judgment by the accrediting organization about whether standards were met and accredited status was to be awarded.

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All of this activity—establishing an organization, setting standards, self-review, peer review, and accreditation judgment—is funded and managed by colleges and universities. Typically, an accrediting organization has a paid staff of modest size to carry out its functions and a volunteer decision-making body or commission responsible for both judgment about accredited status and the governance of the accrediting body. A large cadre of volunteer academics is used to conduct peer reviews, with some 19,000 serving in 2008–2009. During that year, accrediting organizations collected and spent more than \$98 million in fees to fund more than 760 full- and part-time professionals and thousands of volunteers who reviewed or took other actions (e.g., special visits, review of special reports) on approximately 3,000 institutions and more than 4,600 programs (Council for Higher Education Accreditation 2010).

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Accreditation has been a very successful enterprise, part of a schema of quality review that has served higher education well. Colleges and universities in the United States are acknowledged throughout the world as having achieved an extraordinary level of access and degree of quality in both teaching and research. Accreditation has been part of preserving the diversity of higher education institutions and the many types of educational experiences available to students; it has also played a role in maintaining healthy competition among colleges and universities. Accreditation in the United States is one of the most powerful examples of successful nongovernmental oversight of a major social institution in any society.

Two Relationships that Define Accreditation

Accreditation is both built on and reflective of the core values of the academy: peer review, the centrality of mission, institutional autonomy, and academic freedom. Peers judge institutional quality based on respective institutional missions. Review of quality is collegial, primarily qualitative, formative, and focused on improvement. Accreditation both requires and supports institutional autonomy and self-determination in making academic judgments concerning curriculum, faculty, and academic standards.

It is committed to academic freedom—to assuring that faculty have appropriate discretion with regard to what is taught, who is taught, who teaches, and what standards are applied.

Two relationships have defined accreditation over the years. The first and older relationship is with higher education institutions, dating back to the 19th century. As described previously, colleges and universities established the first accrediting organizations and to this day own, finance, and operate these bodies. It is this relationship that has determined the core values on which accreditation was built and continues to operate. While accreditation's relationship with institutions has been rich and productive, it has sometimes involved strain and tension—no one seeks regulation, even if you pick the regulators. There have been periods of some discord and disagreement. However, the basic authority of accreditation has not been seriously challenged. Institutions, as “members” of accrediting bodies responsible for setting standards and determining review practices, have generally supported and remain strongly invested in the role that accreditation plays.

Accreditation's second and younger relationship is with the federal government, dating back some 60 years. During the 1950s, the federal government and accrediting organizations entered into an agreement in which the government, rather than developing its own oversight of higher education, chose to rely on nongovernmental accreditation as its “reliable authority” on academic quality. As higher education enrollments and the number of higher education institutions grew significantly following World War II, the federal government sought to financially assist college and university students, especially veterans. As part of making federal funds available to students and institutions, the government required institutions to be accredited by an accrediting organization that it deemed appropriate. Accredited status was the key indicator that the government's expectations of threshold quality had been met. This public-private partnership prevails to this day. A core feature of this partnership was the agreement that accrediting organizations, although nongovernmental bodies, accept some federal oversight. This relationship has become known as the “gatekeeping” role of accreditation.

Accreditation's Fundamental Challenge

It is this relationship with government that is posing perhaps the most fundamental challenge that accreditation

has confronted to date. This challenge has two features: (1) government moving to take on at least some of the academic decision making that has, historically, been left to accreditation and (2) the emergence of an approach to academic decision making and accreditation that is regulatory in nature and based on assumptions and values that do not align with accreditation's traditional collegial values and practices. Today, government is poised to alter core accreditation practice—something that has not happened since the establishment of the public-private partnership in the 1950s. The traditional collegial practices of accreditation are increasingly eclipsed by regulatory practices imposed by government, both in the scope and the attention to the details of accreditation practice.

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Factors encouraging greater governmental authority.

Several factors have combined to lead the federal government to press more vigorously for greater authority over accreditation than at any time in the past. The first is the growing federal financial investment. As part of its ongoing effort to assure access and equity in higher education, the federal government has invested more and more tax dollars in student grants, loans, and other funds. By 2010, the federal investment in higher education funding had reached \$175 billion. The sheer volume of federal money in colleges and universities has created an imperative for both the Congress and the White House and is a primary justification for greater oversight. In 2010, the U.S. Department of Education (USDE), already managing federal grant monies, established authority over all student loans, ending the role of private-sector banks and consolidating federal control over much of the public money essential to access.

The second factor is the cost of tuition or the price of higher education. For decades, costs to students have continued to rise, now even outpacing the increased costs of healthcare. The rising price of higher education for both students and taxpayers was made even more conspicuous by the 2007–2009 recession, intensifying the concerns about college affordability already prevalent in society and attracting the attention of federal officials.

Public accountability is a third factor driving the expansion of governmental authority. It is not only the government but also the press and the general public who want more accountability from accreditation in the form of greater evidence of student achievement and institutional performance as well as increased transparency. The focus on public accountability has emerged as society has grown to expect universal access to higher education. This expectation reflects a consumer-like interest in what higher education is supposed to provide. Where at one time society valued higher education as an opportunity and prized open access even if it did not always result in academic success, this is diminishing. Degrees are valued mainly to the extent to which they result in good paying jobs, diminishing the once primary emphasis on expanding intellectual capacity. If colleges and universities fail to graduate students or assist with the achievement of other educational goals, then they are viewed as inadequate. Universal access also now means that higher education must meet a test of convenience as manifested in steadily growing enrollments in online learning, with part-time students seeking to combine education and work.

A broader context. Two additional trends affecting many parts of U.S. society also impact the government's perception of accreditation: (1) the expanding nationalization of public policy and (2) the growing application of electronic technology. The expanding nationalization of public policy means that, with greater and greater frequency, policy determinations are being made at a federal or national level. National trumps state and local, with an emerging national culture fueled by electronic technology that influences both, whether initially through the web or, more recently, through social networking. Technology has created the expectation of instant information, hastening the eclipse of personal and institutional privacy and rendering all judgments equal—whether from informed professionals or newcomers to an area of inquiry.

National also trumps institutional and the traditional leadership role that faculty and academic administrators have played in making academic judgments, a role that has been central to the success of higher education to date. Institutions and their programs are the units of analysis for accreditation scrutiny and judgment, driven by their commitment to mission and thus a diverse higher education enterprise. If the price of nationalizing is a diminution of the traditional institutional leadership role, then this raises serious questions about sustaining the strength and success that higher education has enjoyed to date.

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Nonetheless, the nationalization of public policy as it relates to accreditation was reaffirmed for federal officials when they became familiar with the European “Bologna Process.” Beginning in 1999, European government ministers have worked to implement the Bologna Process as a means to create a “European Higher Education Area”: a space with significantly enhanced student mobility, faculty cooperation across borders, and mutual understanding and acceptance of academic credentials among countries. Although universities and students were very much involved, regulation by the ministers was the key driver for creating this space. Enormous progress has been made in developing a European-wide regulatory structure for quality assurance with quality standards and policies to be applied throughout the Bologna countries. The structure now includes a European qualifications framework, European standards and guidelines, a credit transfer system, a European classification system, and the beginnings of a European ranking system. Given the similarity in population size between Europe and the United States, U.S. government officials were attracted to what they viewed as a potential model for the national regulation of accreditation.

Further, the growing application of electronic technology has played a large role in what has been happening to accreditation practice. Public expectations for access to information about any social institution—including accreditation and higher education—have expanded dramatically. Whether it concerns government, corporations, charities, athletics, or universities, there is a growing public sense of impatience and entitlement about being informed and making one’s own judgments. Electronic technology is rendering the private dimension of accreditation—its process and the information available about results—quaint. It makes the time that accreditation review takes less and less acceptable. It throws into question why professional judgment should be viewed as superior to consumer judgment.

Technology is also an enabler of alternative tools for judging higher education, such as ranking systems and comparability systems. Accredited status and reputation, the two longstanding indicators of the quality of a college or university, now have competition. For some, *U.S. News & World Report’s* rankings are the de facto indicators of quality—not accreditation. For others, www.ratemyprofessors.com provides an external basis for judging the quality of faculty, something that accreditation does not do. The Education Trust, a nongovernmental

national organization in Washington, DC, has established College Results Online, a web-based interactive tool that enables students and the public to compare colleges and universities, including graduation rates, admissions, and financial aid. The USDE offers College Navigator, another web-based interactive tool that enables comparisons of colleges and universities: locations, enrollments, degrees awarded, tuition, and test scores. Both have attracted broad public interest while accreditation, to date, has chosen not to address comparability.

The federal money at stake, the price of higher education, the expectation of universal access, the press for greater public accountability, the nationalizing of public policy, and the immediacy created by electronic technology have all contributed to an expanded government role in accreditation that is profound. Government now approaches accreditation driven by:

- A belief that colleges and universities are accountable and trustworthy to the extent that they are regulated.
- A belief that changes in accreditation require a greater federal role.
- The greater attractiveness of a regulatory model of quality assurance in place of the prevailing collegial model long characteristic of higher education.
- A strong interest in the standardization of higher education, especially to judge degree attainment and student learning and to build capacity for comparability.
- A utilitarian view of higher education that emphasizes its contribution to economic development more and its contribution to intellectual development less.
- A view that education is a consumer good and that students who purchase it require consumer protection, especially by the government.

In the current context, it is no longer enough for accreditation to (1) be answerable to the institutions and programs that are reviewed (self-regulation), (2) make extensive use of peer review, (3) provide some but not all information to the public, (4) rely heavily on qualitative judgment about academic quality, and (5) sustain a mission-based approach to quality that may not readily lend itself to the standardization of expected results. And, critics tend to overlook the value of accreditation, especially with regard to quality improvement, and to ignore the substantial contribution of accreditation to the growth and development of the higher education enterprise.

The Path to Expanded Governmental Authority

When the federal government decided some 60 years ago to look to accreditation as a reliable source of information about academic quality, there were a half-dozen requirements an accrediting organization had to meet to be on a federal list published by the U.S. Office of Education. These included evidence of operation over a multiyear period, financial sustainability, and promulgation of the standards used in accreditation review. Requirements for accrediting organizations were not in law or regulation, but were less formal, grounded in government practice that worked to preserve the public-private partnership.

As the years progressed and federal requirements for accrediting organizations found their way into regulation and, eventually, into law, the requirements expanded in scope, detail, and number. Today, little in accreditation is too unimportant to avoid regulation. As requirements expanded, so did a federal review process for accrediting organizations known as “recognition.” At present, accrediting organizations are subject to 10 standards in the law, 37 pages of regulation (U.S. Department of Education 2012a), and 82 pages of guidance (U.S. Department of Education 2012b) or subregulatory assistance—an extraordinary growth in oversight and a long distance from the original six obligations that governed the initial era of the partnership. Accrediting organizations must be reviewed at least every five years by the USDE in order to maintain federal recognition.

The most recent and dramatic changes to accreditation emerged from the actions of the federal government that began with the 2005–2006 U.S. Secretary of Education’s Commission on the Future of Higher Education. This commission, made up of academics, business leaders, and the public, was charged with examining higher education and offering recommendations for its future, focusing on access, affordability, and accountability. Its work set the tone for the government’s future approach to accreditation.

The commission’s report made the case for greater public accountability from accreditation and especially for greater attention to evidence of student learning and transparency. It offered a very public criticism, viewing accreditation as being lax on standards and failing to take adequate responsibility for student learning, and pointed to results of national research purporting to provide evidence that students were not gaining very much from a collegiate experience. Crucially, in light of the perceived shortcomings

of accreditation, the report urged the government to become more involved in the academic activity of colleges and universities. In many ways, these recommendations used the same lens to examine and judge higher education that was applied earlier to elementary and secondary education through the No Child Left Behind Act of 2002.

The commission’s report was influential in the formulation of subsequent law and regulation. The reauthorization of the Higher Education Act, completed in 2008, is a powerful example of the report’s impact, resulting in a larger government footprint in both accreditation and academic areas heretofore untouched by government action: transfer of credit, textbooks, student achievement, and distance learning. For accreditation operation, the law penetrated areas such as accreditation confidentiality, the accreditation appeals process, and the use of attorneys in accreditation proceedings—all areas untouched in prior reauthorizations.

The negotiated rulemakings (required consultations with the public when the federal government writes regulations to implement new law) held in 2009 and 2010 went even further with regard to the government’s role in academics—developing rules that provided greater control for government in regard to the awarding of academic credit, thus striking at the heart of judgment by academics in the awarding of degrees. The new rules also strengthened the role of government in judging the integrity of information provided by institutions to the public and pushed for a stronger state role in authorizing institutions to operate that, at times, was either duplicative or eclipsed at least some of the work that accrediting organizations had been doing for individual states for years.

Difficulties experienced by for-profit higher education in 2010 and 2011 served as additional justification for greater governmental involvement. Through Congressional hearings, the sector’s default rates, graduation rates, student recruitment and marketing practices, and level of student debt were put on public display, often accompanied by public condemnation. These were institutions that, although private, were heavily dependent on federal funds—and they were accredited. The conclusion reached by some in government was that accreditation was no longer adequately reliable with regard to the fundamental soundness of an institution. Significant additional regulations were developed aimed primarily at the for-profit sector, and there were indications that additional federal oversight would be required for accreditation as well. This included attention

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paid to the compensation of employees as well as the employability of students and their capacity to repay government loans.

By 2011, accreditation's historical role in assuring academic quality, as well as a certain deference accorded by government for the judgment of quality by academics, was giving way to more and more government intervention that directed the activities of accreditation and made independent judgments about quality. Nowhere was this more striking than in the emerging governmental efforts to duplicate or even second guess the judgments of accrediting organizations concerning individual institutions or "co-accreditation." For example, in the last 18 months:

- Institutional Accreditor A was informed that the USDE disagreed with the accreditor in its judgment regarding changes in the general education curriculum at one of its institutions, thus challenging the judgment of the accreditation commission.
- Institutional Accreditor B, beginning in 2010, was required by the USDE to report all accreditation of institutions new to the accreditor to the USDE on an annual basis.
- Institutional Accreditor C was informed by the USDE that the manner in which the accreditor selects its commission members—the body making accreditation decisions—required modification.

In addition, the USDE, through the National Advisory Committee on Institutional Quality and Integrity (NACIQI), a body that advises the U.S. Secretary of Education with regard to the recognition of accrediting organizations, has initiated a policy review of accreditation and its effectiveness. This is part of the USDE's preparation for the next reauthorization of the Higher Education Act in 2013 or 2014. While the committee membership includes a significant number of academics, the committee has approached accreditation from a perspective that assumes there are significant problems with the enterprise that must be solved and that expanded federal regulation is required to bring this about.

The work of the committee to date breaks dramatic new ground by expanding the federal interest in accreditation in a manner that can result in further subordinating accreditation to governmental goals and judgments about quality:

- Accreditation standards, requirements, and processes are, in the future, to be shaped by a federal agenda.

- Federally mandated fiscal integrity and performance measures are to be established for higher education institutions and monitored by accreditation.
- Federal goals for higher education are to be developed for the use of federal funds.

Accreditation has reached this point of fundamental challenge as a result of a series of government actions dating back to the initial establishment of the accreditation-federal government relationship in the 1950s, but especially as a result of actions taken over the last six years. Over time and as the result of a variety of forces and conditions, governmental authority over accreditation and higher education has expanded and continues to expand. At stake is the giving way of the highly successful collegial system of peer review and institutional leadership in academic judgment to a system of greater governmental authority dominated by a regulatory model of control over accreditation and higher education.

Building the Future of Accreditation

The future of accreditation depends on what is done to render a government-driven regulatory model less of a defining factor in its work. Can the collegial model flourish in the context of the government's assertiveness and the impact of nationalization and technology? How?

While actions are unlikely to fully reverse the extensive role that government is taking in accreditation, it may be feasible to contain the government's impact. Four actions may be helpful. These include greater advocacy for accreditation; reaffirmation of the traditional role of institutions, not government, in providing academic leadership and judgments about quality; robust institutional steps toward greater public accountability; and changing the community's approach to influencing government policy.

First, if the academic and accreditation communities do not make the case for the values and effectiveness of accreditation, who will? The need for greater advocacy is urgent and compelling. For more than a century, accreditation's overall performance has been part of the creation of a higher education enterprise that is unsurpassed in both access and quality, whatever its limitations. Peer review is effective. Self-regulation works. The values on which accreditation was built and those it reflects have been fundamental to the past success of higher education and remain critical to future success.

This advocacy needs to highlight the compelling role that accreditation currently plays in society. As the primary signal of the basic academic acceptability of colleges, universities, or programs, students, the public, and the government rely heavily on accreditation. “Is it accredited?” is often the first question of prospective students and their families, employers, and foundations when deciding to attend or invest in a college or university. It is the first question of institutions examining the prior education of students seeking to transfer or to enter graduate school. Accreditation also plays a vital role in the directing of federal funds to colleges and universities and in decisions about state funding of higher education.

Second, higher education’s long tradition of leadership in the judgment of academic quality at the institutional level needs to be reinforced. Faculty and academic administrators have historically been the primary sources of judgment about what counts as effective education, student achievement, and paths to success in teaching, learning, and research. With governmental oversight expanding into the academic arena, this role of institutions may be diminished. Presidents, academic deans, and faculty need to acknowledge what is happening and make the case for the greater value of academic judgments made by academics rather than by government officials with little or no academic experience. The academy leaves its future up to others by not leading.

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Third, accreditation needs to more fully engage the public accountability imperative in order to influence it. Institutions and accreditors need a stronger voice.

Efforts over the years to ignore the growing emphasis on public accountability—and there have been many—have proved futile. Initiatives that attempted to essentially finesse accountability using assessment have not succeeded. The public is interested in disclosure, not assessment. Disagreements within the community have also been a significant barrier to moving forward. Yet, the utilitarian approach to higher education that now dominates public policy needs to be challenged. The price of failing to act with regard to accountability continues to grow.

Accrediting organizations, colleges, and universities need to provide more information to the public about performance and what counts as basic academic

effectiveness. For example, each college or university can agree to a short list of performance indicators, developing evidence of achieving success in these areas and publishing the information. This might include information about graduation, achievement of other educational goals, transfer, entry to graduate school, and, where appropriate, job placement. This effort would assure more attention to student learning and transparency, two key demands of public accountability. It would also provide the public with a better sense of the likely results of investing in a college education. It would not interfere with the work of faculty and their academic freedom. It would leave judgment about student achievement where it belongs—with the faculty.

Fourth, strategies that are currently used to influence government policy need a fresh look. These strategies have been around for a long time. For the most part, both the academic and accreditation communities have approached growing governmental authority by learning what the government wishes to do and attempting to accommodate it in a way that minimizes any likely negative impact. This has not been working with regard to accreditation. The challenge is too great, too fundamental, for an incremental approach. What is discussed here—a program of strong advocacy for accreditation, a renewed commitment to the role of institutional leadership, and the development of a public accountability that works for accreditation—can figure effectively into our influencing.

Ideally, accreditation can reach a point where the government is willing to affirm the value of the key characteristics of higher education and accreditation: institutional autonomy, peer review, academic freedom, and, above all, institutional academic leadership. Government can acknowledge that judgments about student learning are the work of faculty—not of government or accreditation. It can streamline recognition review. It can acknowledge that much of the current oversight of accreditation does little to improve accreditation organizations or their review of institutions and therefore does little to improve the quality and effectiveness of higher education.

Summary

Accreditation in the United States is undergoing a major change as governmental regulatory authority to judge quality expands, eclipsing accreditation’s collegial model of quality review. The enormous growth of public and private money in higher education, the commitment to universal

access and the accompanying calls for greater public accountability, the growing nationalization of public policy, and the impact of electronic technology have all contributed to this change. Especially over the last six years, this shift has challenged the core values of both accreditation and higher education and now threatens heretofore successful academic practices such as the judging of quality by academics and institutional self-determination. While fully countering the expansion of governmental authority is unlikely, action from the academic community is essential to contain the expansion and preserve core academic values. These actions include greater advocacy for accreditation, a renewed emphasis on the role of institutions in providing academic leadership, an enhanced commitment to public accountability, and a rethinking of approaches to working with the federal government. ❧

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