

The Future of Accreditation
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It is certainly a pleasure to be with you and I want to thank ACCET’s president Roger Williams, planner extraordinaire Sandy Lockwood and all of you for your commitment to quality continuing education and training. You’ve had quite a conference, and I know I am the last person between you and the exit door – so I appreciate your “Taking a Stand” and sticking around for this talk.

I don’t need to tell you that the last two years in Washington have been quite interesting – and the future may be more interesting yet. After five years of wrangling, the Congress at last reauthorized the Higher Education Act – and the Ed Department has already started to write regulations which will not really see the light of day until the next administration is decided.

The most interesting part of the story I think is one in which you are integrally involved – namely, accreditation. I can tell you that when I first got into the business of higher education, accreditation was not a household word. In 2002, when the American Council of Trustees and Alumni issued its first report on accreditation, there was – quite frankly – passionate, but fairly limited, interest.

So I think it is a testament to the Commission on the Future of Higher Education, to Congress, and to accreditors—as well as the growing focus on accountability—that we find accreditation to be a topic of increasing national interest.

I think it is also important to take a few minutes to look briefly at accreditation and its origins – since those origins both inform and complicate the current situation.

From the very beginning, Americans have expressed their preference that education be subject to local control – and not a power delegated to the federal government. This is in distinct contrast to the French who have an education ministry and the English who put their faculty in charge. As a consequence, colleges and universities are run by lay boards of trustees that are secured from federal interference, thanks to Daniel Webster’s 1819 suit before the Supreme Court.

Free from government intrusion, academic institutions in the United States developed a nongovernmental system of peer evaluation. Voluntary educational associations arose in the late 19th century to differentiate colleges from high schools—that is, true “higher” education from secondary education. Over the years, these bodies developed criteria to identify the characteristics of a sound educational program. As you know, they called this identification process accreditation.

With the passage of the GI Bill, accreditation took on the role it has today-- to serve as a gatekeeper for federal subsidies. At the time of the Bill’s passage, Congress believed that accreditation would ensure accountability without subjecting institutions to harmful external controls. The U.S. Secretary of Education annually certifies which accrediting associations are “reliable authorities regarding the quality of education.”

In the 1940s, the federal spigot was barely on. Now, sixty years later, federal student financial aid alone exceeds \$78 billion a year.¹ For a college or university to lose its accreditation would be a fatal blow. Perhaps it’s not surprising, then, that in the more than 60 years that the federal government has mandated accreditation, very few schools have been shut down, and those largely for financial reasons.

In the last twelve years, only one accreditor has been officially deemed inadequate.ⁱⁱ Does that mean that every accreditor is a reliable authority on education quality?

In a word, no.

As many of you in this room know, ACTA has been outspoken –as I have been – on the system of accreditation. In my time on National Advisory Committee for Institutional Quality and Integrity (NACIQI), I opposed the renewal of virtually all of the regional accreditors that came before me for one reason – they have not been reliable guarantors of educational quality. When ACCET received its seal of approval from the Feds, you had to prove that you were a reliable guarantor of educational quality. Your standards look at student progress, attendance, participant satisfaction, completion and placement, instructional methods and training and evaluation of pass rates. You insist that your institutions have one-year and longer-range plans that encompass both the educational and business objectives of the institution. Those plans include “clearly defined specific objectives and operational strategies with time frames, resources, and measurable results identified for subsequent evaluation.” And you have established benchmarks to validate the quality of the outcomes of such programs.

Regional accreditors have also established standards but one has a hard time seeing how their standards have guaranteed academic quality or provided any meaningful information about student achievement. Rather than focusing on quality assurance for the public, which was what Congress intended, the regional accreditors in fact view themselves – at best – as promoting institutional improvement, a role that the voluntary system initially fulfilled. It is a diagnostic, interpretive role – in which institutional knowledge, not public information, is the key component – that accreditors play. In this way, accreditors’ interests are noticeably different from the interests of the federal government. While Congress wants quality assurance, regional accreditors want internal reviews. As practiced, regional accreditation thus fails to provide real accountability to the public.

Indeed, while regional accreditors oversee the largest number of four-year institutions around the country, educational standards have been declining. Meanwhile, there is ample evidence that these self-same regionals have used their power as federal gatekeepers to apply intrusive prescriptive standards and have enforced ideological tests and other criteria unrelated to educational quality. Under the authority they wield as agents of the federal government, the major regionals routinely insert themselves into the internal affairs of their member schools. They attempt to undermine the power and authority of duly elected and appointed trustees who, in the eyes of the law, hold the ultimate responsibility for the wellbeing of their schools. And quite frequently they serve as a barrier to new entrants in the market by focusing on inputs rather than results.

The bottom line? The accreditation regime – at least as it concerns the regionals – fools the American people, pretending that the process implies quality when it often does not.

These concerns were the driving force behind recommendations made by the Spellings Commission to reform and transform the existing accreditation system. Otherwise, as one professor puts it, “the public treasury is emptied in support of a catapulting decline in basic national literacy.”

Yet when the Department of Education tried to find a way to ensure educational quality, what did the higher education lobby do? Threatened with a focus on higher educational standards, they claimed that institutional autonomy was under attack and a national ministry of education was right around the corner – and went running to Capitol Hill for redress. After intense lobbying from One Dupont Circle, the Senate and House approved bills which left the determination of learning goals and standards up to institutions. The establishment continued its lobbying, seeking to water down further provisions. In particular, CHEA lobbied against requirements that accrediting agencies at the very least review the

information that federal law requires institutions to provide to students. The Council also lobbied for having Congress appoint a majority of the members on NACIQI.ⁱⁱⁱ In the Higher Education Act that eventually passed, the One Dupont Circle crowd got virtually all it wanted.

But...they should be careful what they wish for, as the old saying goes.

Having succeeded in their lobbying efforts – in convincing Congress to put lobbyists first, and students, parents, and taxpayers last – the folks at One Dupont Circle may now have eliminated any reason to keep regional accreditors in the “catbird seat” in which they presently find themselves.

In the past, accreditors were charged with being “reliable” authorities regarding educational quality. In order to be certified by the federal government as gatekeepers of federal funds, accreditors had to establish that their standards effectively addressed the quality of institutions with respect to “student achievement.” Now, Congress has removed their quality assurance role altogether, saying it is essentially up to the institutions to decide what “quality” is. Congress has effectively said to our colleges and universities: We will give you billions of dollars to spend, and trust you to do the right thing. Congress no doubt thought it was championing institutional autonomy, but in doing so, it eliminated the government’s interest in requiring the current setup of accreditation

So Where Do We Go From Here?

For the reasons I have just outlined, I hope to see significant changes in accreditation. First of all, it is my hope that the regional accreditors will take their cue from accreditors like ACCET and other national accrediting organizations – which have long been focused on measures that get at the real issue of educational quality. What is needed broadly is something you have done for a long while – namely attention to mission fulfillment while focusing on quality assurance.

The Accrediting Council for Independent Colleges and Schools requests data annually on program completion and job placement. Similar reporting and performance standards requirements have been adopted by the Accrediting Commission of Career Schools and Colleges of Technology and you. ACCET notably requires programs to survey employer satisfaction and job placement rates. This is something for all accreditors to consider.

Secondly, the Secretary of Education can and should take action in order to push the regionals toward these positive changes. Namely, with a stroke of her pen, the Secretary could abolish the geographical monopolies currently granted to each regional and allow competition across the country. Why should a college in the south have to work with SACS? Why not with Middle State, or another accreditor of its choosing – that is, with whatever other accreditor it thinks best suits its mission?

Some would have us believe that any change in the status quo would result in disaster, but that is not so. The Department of Education currently has in place various regulations that require institutions, nonprofit and for profit, to submit financial audits and to maintain good standing with the Department in order to participate in Title IV programs. These audits ensure that student loan funds are expended on financially responsible institutions and provide consumer protection.

We can see best practices in other industries. After the 1992 Earth Summit in Rio de Janeiro, for example, loggers, foresters, environmentalists and sociologists joined together to form the Forest Stewards Council. The FSC sets voluntary standards and criteria on what amounts to a well-managed and sustainable forest and then it accredits organizations to certify those forests which meet the criteria. The FSC certification is widely known, widely accepted, widely prized, and drives consumer behavior. Accreditors – freed of federal mandates – could potentially work in the same way, offering various levels

and kinds of accreditation – of value to both the consumer and the institutions. Institutions can call on accreditors if they find their services useful. Meanwhile, the onus will be placed on trustees, and not the federal government, to ensure quality.

A second positive prospect is greater competition in the states. Right here in Texas, the Texas Higher Education Coordinating Board has taken the lead in showing how states can detour around the costly, time-consuming regional accreditation route. The Board recently approved new rules that will allow any accrediting bodies recognized by the Department of Education, not just the regional accreditor, to accredit colleges in Texas.^{iv} The new rules also establish an alternative path to state certification, giving new entrants a way around the existing accreditation process. Of course, to be fully effective, credit transfer limitations must be abolished – and these measures have that long-term goal in mind.

A college that needs or seeks both regional and one or more specialized accreditations may be faced with a medley of inconsistent and uncoordinated standards that add to the difficulty and costs that accreditation entails. The Texas alternative means that institutions of all kinds will now be able to enter and compete in Texas, giving students more choices and parents and taxpayers greater accountability.

At the same time, the broad community of accreditors could conduct workshops on assessment that are designed for general faculty development. This is something that several national accreditors do already and it should be replicated.

Accreditors should compile and disseminate description information about the institutions or programs they accredit. According to a recent study issued by CHEA, “less than a fifth of the accreditors provide even summary information on individual, institutional, or program performance.” Worse, not a single regional accreditor provides such information.^v But this is the kind of information that the public desperately needs. This transparency could be immensely valuable, and it is something that can be done by institutions immediately, as recent efforts by NASULGC and AACSB make clear.

Growing public policy concerns about the flow of students through the pipeline make it imperative that low graduation rates be examined explicitly. At the same time, it is imperative that there be a productive and collaborative effort to address transfer of credit problems. According to a report issued this year, “a 1999 CHEA survey of college catalogs found that 28 percent of regionally accredited institutions contained language that transfer requests would be considered only from institutions that were regionally accredited. Another 10 percent contained language that transfer requests from institutions that are reviewed by national faith-related or national career-related accreditors would be considered, but that regional accreditation would be preferred.”^{vi}

In a world where nearly 60 percent of college students can be expected to attend more than one institution of higher learning, the institutional practice of privileging certain kinds of federally-recognized accreditors over others cannot continue. Simply publishing one’s credit transfer policies is not enough. If accreditation wants to survive, it must look at how sending and receiving institutions manage the transfer function to ensure an easier and less costly progression by students.

The students who are hurt most by difficulties in transfer are those with the least amount of advising, the least amount of money to spend. This is unconscionable and ACTA would like to work with you and others to call for more clearly developed articulation agreements and immediate attention to a more seamless transfer process.

Fairly soon, we will see a sea-change in Washington. But whoever is in charge, it will be essential to keep attention on the accreditation process. We must focus on ways that we can provide parents and taxpayers with more information about whether and how institutions of higher education –

funded by their hard-earned dollars – are doing their job; the ways that we can streamline the transfer process, and most importantly, the way we can put students – rather than One Dupont Circle — first. I look forward to working with you.

ⁱ Federal Student Aid, “About Us,” U.S. Department of Education.

<http://studentaid.ed.gov/PORTALSWebApp/students/english/aboutus.jsp> (accessed June 9, 2008).

ⁱⁱ Email from Melissa Lewis, Executive Director, National Advisory Committee for Institutional Quality and Integrity, US Department of Education, to Anne D. Neal (Feb. 5, 2008)

ⁱⁱⁱ Council for Higher Education Accreditation, Memorandum, May 27, 2008.

^{iv} Texas Higher Education Coordinating Board Rules §7.6.

^v Peter T. Ewell, U.S. Accreditation and the Future of Quality Assurance, p. 112 (CHEA, 2008).

^{vi} Id. at 139.