

Kyle Beltramini (00:00):

Welcome to Higher Ed Now. I'm Kyle Beltramini, ACTA's Policy Research Fellow. And today, I'm joined by David Eubanks, assistant vice president of the Office of Institutional Assessment and Research at Furman University. Professor Eubanks has worked on over 30 publications and done countless presentations on the philosophy and practice of leadership in higher education. For the purpose of our discussion today, we'll be relying on his expertise in strategic planning, institutional effectiveness, and data-driven decision making to shine a light on the relationship between accreditation and academic quality.

(00:30):

David, great to hear from you.

David Eubanks (00:32):

Thanks for the invitation. It's great to be here, Kyle. I'm looking forward to this conversation.

Kyle Beltramini (00:36):

Now, I think the two of us could probably chat for hours about this topic on accreditation in higher education. But to be honest, whenever I chat with the average person, they seem to have their eyes glaze over after a minute or two. And that might be something that I'm doing wrong, but I want to start off on the right foot here. Why should our listeners really care about this topic?

David Eubanks (00:53):

Yeah. And I was one of those people originally that had their eyes glaze over so I can relate to that. At the end of the day, what we're trying to do with accreditation is assure a common set of quality measures that institutions and programs adhere to. If you get lucky enough to get into a medical school, you want to know that they have appropriate faculty and that their curriculum looks like a medical school curriculum, and so forth. So it's a basic insurance against bad actors who might want to make claims about an educational experience that they can't really live up to, but charge you nevertheless.

Kyle Beltramini (01:32):

And how did you get interested in the topic? And what have you done so far and how have you been involved in accreditation?

David Eubanks (01:37):

I got involved kicking and screaming because I didn't want anything to do with it. I was trained as a mathematician, I was a math professor at a small college. This was just one of those committee assignments, everybody has to do stuff, and it looked bureaucratic and there was so many rules, and so forth. So it's a strange twist of fate that I ended up actually diving into it and enjoying it. I tell my daughter, she's 27 and making her way in the world. It's like you can't really anticipate the career changes that are going to happen, and what you think you may like now may not be what you like in the future.

(02:11):

So I got involved with it mainly from the data point of view because there are lots of numbers, how many faculty members and so forth. My math work bled over into service to the college I was at, doing these kinds of reports. And then it's a small step from doing the numbers to talking about those numbers in a narrative, and then understanding what's the point of all this. So I got put in charge of assembling the report, and then have been involved as a reviewer. I've been involved as an advisor to the Department of Education on top level policy of accreditation. And I'm still involved in writing this report.

Kyle Beltramini (02:51):

That's really valuable you've had the opportunity to be both an external observer of how this works as a faculty member, and then you've had the opportunity to actually do the peer reviews and then advise at it on the policy level. So it's really covering all of your bases about this topic and I think it speaks to just how complicated this issue can be, where you have these private accreditors that are doing the peer review and many of the peer reviewers are faculty members at the institutions. And then those accreditors take that information that the peer reviewers find and then eventually publicize it. And then when they publicize it, that information is scrutinized by the Department of Education, like you said. It touches on this private-public partnership that's been burgeoning in higher education since there's so much public funds flowing into the sector.

David Eubanks (03:34):

Right, yes. Everybody's got a stake in it. The public spends money on it through our taxes and their distribution. But also, we all have a stake in an educated populous.

Kyle Beltramini (03:46):

So getting into the weeds on this one, what is the process of actually reviewing an institution look like? When you were doing your peer reviews, were there specific tasks you were given, or did you have a lot of freedom to pick and choose?

David Eubanks (03:58):

Right, that's a good question. The answer would vary by the type of institution or program and the accreditor, but I think by and large, there are a set of published standards that the institution and the program is supposed to demonstrate that they meet. So take qualified faculty members, we're supposed to show that the instructors we have in courses are qualified to teach those courses. And while you do have the freedom to choose your own adventure, there are generally established ways of making these kinds of cases. The kinds of evidence that you would present for faculty members would be to say this faculty member's teaching biology and they have a PhD in biology from Duke University. That's about all you would need in that case. And then of course, not everything is that cut and dried.

(04:45):

So I think the rule of thumb is the more abstract the standard is, the more imagination you have to bring to both writing your argument for it, and as a reviewer, to try to sort out whether or not the standard is being met. I've worked with a number of these committees, mostly now as chair, probably six or seven committees as chair. Where you have a group of faculty members and administrators drawn from all over and we read the evidence, we look at any kind of attachments that might be relevant and try to understand what the institution is presenting in contrast with what the standard says is supposed to happen. And I admire these folks who volunteer their time to do this. These have been uniformly good experiences for me, at least in the Southern Association where I've done all my committee work. Really top-notch folks volunteer for this and I think it's a process they all take seriously.

Kyle Beltramini (05:44):

And I think that's probably one of the bigger differences between accreditation at a lot of the other regulatory bodies that people may be more familiar with. Is that this process of peer review, because it's done by folks who are intimately familiar with the process of educating a student, you often get people that really do believe in the system. They really want to make change or they want to ensure that institutions are doing right by their students. Does that sound a fair characterization?

David Eubanks (06:09):

Yes, I think that's fair, and I think there are pluses and minuses to that insider knowledge.

Kyle Beltrami (06:15):

And we can definitely get into those pros and cons a little bit later. I'm sure that we'll have a bunch of different issues to dig into. That's really one of the benefits of speaking to you on this topic, is that because you've got that experience at all of those levels, you've seen it from the outsider's perspective, someone like me that only sees what's published and the outcomes that pop out. Versus somebody that's a professor that has to deal with the additional paperwork, and sometimes they might be grabbed, like you said, kicking and screaming onto the committee.

David Eubanks (06:40):

Right, of course.

Kyle Beltrami (06:41):

So looking at accreditation and speaking of outsiders, a lot of the times when folks are talking about it, one of the common criticisms that I see is that it's kind of focused on inputs and processes rather than outcomes. We've seen a lot of individuals start to call for accreditors to take student outcomes up in their standards and to take a lot more effort to assessing if institutions are doing well by their students, looking at things like graduation rates, return on investments, and there's a bunch of different measurements that have been proposed here. I'm curious if you think that that shift from inputs and processes to outcomes is something that needs to happen or is this a valid critique? Or do accreditors actually tend to dig into these a little bit more than the typical outsider might appreciate?

David Eubanks (07:27):

I think it's a valid criticism, and I think it's one that accreditors would acknowledge and say that they've been working on outputs for a long time. The Nation at Risk Report 1983 led to another report focused on higher education and they were using that kind of language as far back as 1984, so people have been thinking about this for a long time. And part of that strand of thought did lead to some changes in accreditation that were intended to monitor and improve outcomes. But as you know, over the same time period, from the '80s on, people perhaps now are facing more economic difficulties in terms of just the question are children more likely to earn more than their parents? By those kinds of measures, economic mobility has declined. So I think there's probably more stress about the question.

(08:25):

And I think accreditors, from what I can see, are paying attention to that and trying to address the outcomes. It's just that it's a difficult question, given the information we have, and there are many ways to define what outcomes should be considered important. And then because people are non-standardized, everybody's got a different set of characteristics. What might be a good outcome for one student or graduate might not be an optimal outcome for another one, so it's very complicated. I do think however that we can and will make progress on that.

(08:59):

I think there's a related question, if I can riff on that?

Kyle Beltrami (09:02):

Sure.

David Eubanks (09:03):

Which goes back to this insider versus outsider. Because we're asking here does all this work that the insiders do translate into something the outsiders, that is the public looking at accreditation, can they really understand what's going on and value it? And I think there is a translation process that needs to happen or would benefit the communication. In other words, I think in some cases, accreditors are doing a good job at monitoring and assuring outcomes, but that can be communicated better to the public.

(09:33):

And I think one of the dangers of having an internal conversation where the reviewers come from higher ed and so forth is that we can fall into a standard way of thinking that diverges from the public. It's like any specialty. You develop a special language, you say, "Well, this is just the way we do things." And if that doesn't periodically have a check from external observers who can say, "What the heck do you mean by that? I don't understand." If we don't have those kinds of periodic reality checks, it can drift out of meaningfulness, and I think we're seeing one of those reality checks now.

Kyle Beltramini (10:08):

Yeah. This really dovetails with a question that's been knocking around in my head for a little bit now. It's the issue of how do we determine and publicize the value of a college education? And often times, that's something that the public is really look out for. Students want to make sure that they're not going to take on a life-altering amount of student loan debt and then end up in a job that lends them no ability to repay it. It's part of the reason why things like return on investment have become a big conversation piece these days.

David Eubanks (10:35):

Right.

Kyle Beltramini (10:35):

But it strikes me that the difficulty of determining the value of education and then presenting that to the public, that's really had some pernicious outcomes. For instance, a lot of institutions that are struggling to demonstrate their value will end up just increasing the sticker price of tuition. Saying that, "Because we're charging so much money, assuredly there's got to be some value here. We're charging as much as Harvard, we're charging as much as this Ivy League institution." So that causes some kind of price inflation. And then the average middle class or lower middle class family may not be able to afford that sticker price, may not be able to understand how tuition discounting might affect their actual net price they're going to pay, and then may not actually want to go to college or may think that they can't afford to go to college.

David Eubanks (11:17):

Yeah. And I think that sticker price versus actual price paid is a good example of insider knowledge versus public perceives when they look at it. They look at a \$60,000 sticker price on tuition and don't realize they're actually going to be paying 20,000. And that doesn't help anyone to have this disconnect in just basic communication. What's a number mean? Does it mean 60 or does it mean 20 is a big difference there.

Kyle Beltramini (11:42):

Yeah. I always hate the idea of going to a car dealership and having to figure out how much I'm going to have to pay for a car. Let's not bring that into higher education, but somehow we did. And it also creates a bit of a, shall we say knowledge asymmetry. Where, just like you said based on the title of that article, college administrators will have a really good idea of how much the average student is going to pay to

attend their college, but the average student or their parents likely won't have that information. That seems like the decks are stacked against the students or potential applicants.

David Eubanks ([12:12](#)):

Yes. And I think it's really worse than that. If you go into a used car lot and you run up to a car and say, "Oh, I love it! I want this one. How much is it?" You can expect to pay a lot of money for it because you're not shopping around.

Kyle Beltramini ([12:25](#)):

They've got you.

David Eubanks ([12:26](#)):

But all right, so compare that situation to a student who gets on campus, they're so excited to be there. They are besieging their counselor with emails and social media, and they've bought the T-shirt. They're giving the same signs that a used car salesman would pick up on, right? Increasingly, there are companies you can pay to take that kind of information, that applicant's likely to attend if we charge them a higher price. So it's the same kind of thing that you see across other sectors of the economy, but I would personally hope that education could be somewhat above that. It seems icky to me to charge someone more just because they're excited to come.

Kyle Beltramini ([13:09](#)):

Yeah. It's taking advantage of the passion of students or somebody that might want to buy into your mission of a higher educational institution might be the most vulnerable to that kind of practice, which is a bit disappointing. It seems like it's weighting the scales in the exact opposite direction that you'd really want.

David Eubanks ([13:25](#)):

Yeah.

Kyle Beltramini ([13:25](#)):

And tying this discussion back to accreditation now, accreditation doesn't seem to me to be a particularly effective way for the average person to understand the value. It's not a great value signifier for the average consumer. Whenever I'll have a chat with somebody, the savviest consumers might be ready to ask, "Is this institution accredited?" And maybe 1% of the people I chat with say, "Are they accredited by a regional accreditor?" But other than those two questions, the average person isn't going to really understand the value of X accreditor versus Y accreditor, or what accreditation necessarily means. So could accreditation be a way to ameliorate this value proposition issue, or is that just a different vehicle do you think?

David Eubanks ([14:07](#)):

I think the accreditation operates more in the background, especially for the large regionals, the national scope accreditors that are accrediting institutions. That they act as Title IV gatekeepers, meaning that there's quite a lot of federal money that's only accessible if they are accredited by a recognized accreditor. And I think for the most part, institutions are voluntarily maintaining their standards, that it's not an antagonistic relationship with the accreditor on most things, unless they just seem like silly standards or something. So I think you're right, that the public may not be super aware of it, but I think that it still has an important effect. Until the last couple of years, people weren't really talking much about accreditation.

(14:57):

So this is maybe a new PR challenge for accreditors. How do we talk directly to the applicants and students? Is there an opportunity there to improve quality, directly talking to the, quote-unquote, "customer?" I don't know. I'm not smart enough to answer that question, Kyle.

Kyle Beltramini (15:16):

So I think you've hit the nail on the head when you talked about the newness of this conversation. I got to say, one of the most jarring moments that I've had recently was when then candidate Trump said that accreditation was going to be a big part of his plan for higher education.

David Eubanks (15:31):

Right, right.

Kyle Beltramini (15:33):

I had never heard a politician, particularly a candidate, talk about this sector when trying to gain office and saying that, "This is going to be something that I'm going to pay attention to." I didn't think anybody paid attention to it prior to then. So do you think it's been a good thing that higher education's been in the news a little bit more, that there's been a little bit more light on the sector? Or do you think that a lot of the conversation around accreditation's become just the average partisan political discussion, rather than something that's been constructive?

David Eubanks (16:02):

I think it's good to have the conversation. As I mentioned, we can become too insul, we're just talking among ourselves. As you alluded to, I think the environment doesn't lend itself to nuanced conversation about the value of different options and that's unfortunate, but people like you and I and the folks we hang out with are having these conversations. And I think that there's market for ideas, and good ideas sometimes can take off, and flourish, and help people, make the world a slightly better place. So I'm optimistic that conversations like this and the ones we have with your colleagues and so forth can do both, the things that need be aired in a critical, but constructive way and look for solutions that might lead to ideas we just wouldn't have thought of before.

Kyle Beltramini (16:52):

One certainly would hope that that happens. Any time these things enter into the public sphere, you get a ton of new people commenting on this and that I think is the real benefit, getting new voices in there.

David Eubanks (17:02):

Yeah, agreed.

Kyle Beltramini (17:03):

So speaking of this from a policy perspective, you just wrapped up some time, like you mentioned, working as an advisor with the Department of Education. You were serving on the National Advisory Committee on Institutional Quality and Integrity, NACIQI. Was there anything that you learned about how this committee functions or their role in quality assurance in accreditation that really surprised you?

David Eubanks (17:26):

It was totally new to me, and I was an odd duck on the committee in that they are mostly important people. And I'm not an important person, I'm just a data person. So in my letter of application which I

thought would go nowhere, I said, "Hey, here's some data issues I think that ought to be paid attention to." And it just happened to ring the right bell, so I ended up on the committee.

(17:46):

So it was all new to me, I'm not used to dealing with policy at that level. Very impressive group of people, a lot of fun to work with. I felt stupid a lot of the time, but I did learn a tremendous amount about how at that level we're attempting to assure quality. And I think it operates a lot of the time from a defensive posture. We've got these pretty philosophical goals, we want to assure quality of education. And that sounds great until we try to break that goal into little bitty things that we can verify with paperwork. And I think it's very easy for the philosophical goal to get ... Abandoned is too strong a word, I don't think anybody wants to give it up, but I think it can get lost in all of the paperwork shuffle. That was a bit of a revelation.

Kyle Beltramini (18:35):

So basically, death by PowerPoint at the highest possible level?

David Eubanks (18:39):

Yeah, not even PowerPoint. Memo maybe.

Kyle Beltramini (18:42):

Even worse. One thing that I know you've worked quite a bit on and I'm really interested to dig down into is this topic of institutional effectiveness that we see from a lot of different accreditors. I'm curious, how do you think that it informs how accreditors assess the institutions that they're reviewing?

David Eubanks (18:59):

Right. So institutional effectiveness was this idea spawned out of that Nation at Risk 1983, 1984 effort that injected what we might call scientific management into accreditation. And the idea was to model what happens in a factory and measure all the things coming off the factory floor, figure out where there are defects and then fix those. And there are some merits to that. Certainly nowadays, if you went around asking institutions, "Hey, are you using data to make decisions," 100% of them are going to say yes. Maybe that has something to do with the emphasis put on it by the accreditors or maybe it's just that data's everywhere now, you can't avoid it.

(19:43):

But I think what happened over those intervening decades is that it became an inside conversation where we're all assuring each other with these accreditation reviews that we're doing something real with this idea about using data to analyze process to make improvements without actually assessing how well it was working. Because it turns out, there are very big differences between manufacturing assembly line and an educational environment. Nothing's standardized and everything's hard to measure.

(20:15):

This is just my personal opinion. I think the institutional effectiveness missed a chance in the accreditors' hands somewhere in maybe the '90s to do some self-critique and improvement. And instead, it turned into one of these internal conversations where we congratulate ourselves, but it doesn't actually work very well.

Kyle Beltramini (20:34):

And I want to burrow into one of the things that you'd mentioned there, the difficulty of measurement, because that's, I think, key in a lot of this. Often times, if you're speaking to somebody from an institution

or even to an accreditor, they'll mention correctly how difficult it can be to set a single standard or a single measurement to assess a bunch of different institutions. And that makes a lot of sense.

(20:56):

For instance, if you're an incredibly selective liberal arts institution and you say, "I'm going to commit to having 40% graduation rates over four years," that might make sense. Or it may very well be that you're bringing in so many high performing students that are expected to get out in four years that that's actually a low bar to climb. Meanwhile, you try to apply that same number to an institution that isn't selective at all, that maybe used to be a community college and still focuses on students from lower income backgrounds or students from working families, or even folks that are working full-time while they're a student. If they try to hit that bar, they may just completely stumble and be unable to do so. It feels like accreditors and institutions are correct to point out the difficulties of establishing these hard floors, these hard numbers that if you cross this line or don't cross this line, you don't get access to Title IV funding and you're not accredited.

(21:50):

But it does strike me that sometimes, there'll be so much critique about these measurement possibilities without really ... They will end up at a spot where nobody wants to do measurement, or eventually there'll be nothing brought forth as an alternative to any particular measurements. Have you ever been part of that conversation before? Does that ring a bell?

David Eubanks (22:13):

Yes, and that's really one of my projects right now, is to help provide tools to accreditors to think about those problems in more depth. So the way I think about it is if we're going to focus on an outcome like graduation rates say, it's not enough to just say, "Oh, we want high graduation rates." We have to understand what causes them, what causes the graduation rate to be high or low, and start backing that up toward the front end of the educational process. For example, we can on an aggregate predict pretty well what a graduation rate's going to be based on the test scores of incoming students and how much it costs. We just take those two pieces of information, we can do a reasonably decent job at predicting the graduation rate.

(23:02):

So that ties together a number of the important metrics that colleges care about. How many students we have, how much are they paying us so we can keep the lights running? And what's their chance of graduating? And then we can add more on top of that. That's enough.

(23:20):

Right now, on my reading on accreditation standards is they break these things up. So you might have a standard on recruitment that has nothing at all to do with standards on outcomes. But these are tightly linked in reality, and so accreditors could do a better job and could help institutions do a better job by taking into the causal impact of decisions that we make during recruitment, student support, and so forth that lead up to the outcome. Otherwise, an institution might have a low graduation rate and have no idea what they can do about it. That doesn't really help anyone.

Kyle Beltramini (23:54):

And offices like the one that you're a part of too, these offices of institutional research and assessment, these seem to be relatively newer organs of the universities. Over the past couple years, I've seen more and more pop up, and I've seen more and more folks at these offices become more active in demonstrating how their universities are responding to issues of student outcomes or how they're serving their student populations. It seems as though universities have caught on to this particular initiative as a way that they can, again, demonstrate the value that they hold. Does that sound fair?

David Eubanks ([24:26](#)):

I think IR offices as we call them have been around for a long time. What's new I think is the data science revolution that's all around us, and this is affecting what IR offices, institutional research offices, can actually do at the institution. Not too many years ago, it was a full-time job just to do all the mandated reporting so we were essentially invisible. We'd do reports for the federal government, we'd do state reports, and something for the board of trustees, and that's all I got time for.

([24:56](#)):

But now with modern data tools, we can do a lot more. And I think there is the opportunity for institutions who want to do that, to figure out how do I resource it, provide some training, but more importantly change the culture of the institution. So that if you have a hard question and you first ask it internally before you run out and hire consultants, and there are a lot of advantages to that. So I think that's the new aspect of it.

Kyle Beltramini ([25:24](#)):

Are there any institutions or consortiums that you feel have been doing a particularly good job in this area, some schools that are particularly data literate or some initiatives that have popped up that can really help schools make those internal decisions based on accurate data?

David Eubanks ([25:39](#)):

Yes. I don't want to mention names of schools, but I think it really comes down to individuals and there are some great data leaders out there. I try to hold a weekly get together of whoever wants to come and talk about the new, cool thing they're doing. There's just a large and growing network of institutional research leadership who have taken on the job of saying, "Let's automate so we're not solving the same problem over and over again, we can solve new problems more quickly. Let's use more advanced methods that are available to solve these kinds of problems," like linking admissions criteria to graduation rates or loan debt. So that we can make more transparent student outcomes.

([26:28](#)):

Like for example, if you have students who stay at the institution for five or six years and never graduate, they've wracked up loan debt and they've paid a lot of money for that. That's a terrible outcome for everybody. But unless you've got the time to create a dashboard that lays that out for you, it can happen invisibly.

Kyle Beltramini ([26:45](#)):

It's really heartening to hear that institutions are really taking these challenges seriously. I feel as though there's been a lot of pushing from outside higher education to try to force particular visions onto institutions or onto particularly state institutions and systems. Are you optimistic about the ability of higher education to proactively seek to address these challenges?

David Eubanks ([27:06](#)):

Yes. Certainly, we have the ability to do that. We're surrounded by experts in every conceivable field and I think the leadership, the folks I work with, are entirely dedicated to positive outcomes. Everybody wants this to work. I guess the challenge right now is we don't exactly what the challenges are. Things change so fast and are so chaotic that it's hard to even figure out which direction to point in. But I think the basic techniques of figuring out what causes what, devoting some resources at least to making sure that we can better understand those causes so that we can engineer outcomes will pay off.

([27:48](#)):

It sounds trivial, but one of the issues with data work is that the data we're generating is not designed to be analyzed, it's designed to be part of an operational thing. So all kinds of crazy things happen. Codes will change. One day, E will mean excellent, the next day it'll mean empty or something like that. Or people will delete data because they don't need it anymore. "It's old data, I don't need that. Why would I keep that around?" Well, we need it if we're going to analyze it. So just becoming aware of the habits we need in order to do proper data operations is itself a big step and I think we're headed that direction.

Kyle Beltramini (28:22):

So bringing this back to accreditors. If the average institution is really doing their best to inculcate this kind of a culture of data-driven decision making, how are accreditors doing in that spot? Are you seeing some of the accreditors try to adopt some of these models and some of this research that's being churned out at the institutional level?

David Eubanks (28:40):

Yes, there are good examples I saw in NACIQI of doing just that. One I'll mention, I won't mention the name, but there was an accreditor who had a stringent outcomes measure in graduation rates and test scores, and the specialized schools had to meet those. And they had those outcomes linked, as I just mentioned, to the recruitment activities. So the schools were supposed to only be recruiting students who they had a good reason to believe would complete.

(29:10):

And there was one example in their presentation where the school, to my recollection, was not living up to those students so I asked them about it. And they said, "Right, the outcome measure here isn't quite what we'd want it to be, but this school is really out in the middle of nowhere. It's the only educational opportunity for a large geographic region that's otherwise isolated. So we made the decision to give them a break on this." Which seemed like a perfectly reasonable response to that. To have some hard and fast rules that apply for most of the cases, but when you get a really hard problem, you can use your professional judgment about what's best for the different audiences involved. So there certainly are some.

(29:53):

I think larger accreditors, as you mentioned, have such a variety of institutions that there's no one way to treat them all and I think this has been a problem in trying to wrestle with how do we understand outcomes. But in my discussions with some folks here in these agencies, I think everyone sees that this is a priority. And I'm hoping that, by putting our heads together, we can come up with good solutions that will work most of the time, and then we have to use our judgment on the rest of them.

Kyle Beltramini (30:23):

So one thing that you mentioned in that point that really brought up a memory for me is this idea of hard versus fast rules. And it's true that a lot of these hard rules can isolate or exclude institutions that you don't typically think about, or the average person doesn't typically think about when they consider what the face of American higher education is. Like the idea of a college in a very rural area where there are limited opportunities for students to go elsewhere, that's not something that the average person's thinking about. Their minds are typically dominated by these discussions of the Ivies, state flagships, R1 research institutions. It really does feel like it's important to recognize just that the diversity of American higher education is so extreme that trying to get these one size fits all solutions can really be a bit pernicious.

David Eubanks (31:12):

Yes, I think you're absolutely right. And when I'm reading these articles that are pointed toward the elite institutions, they're almost irrelevant to my world. And how the kinds of students, the kinds of numbers

and outcomes, and so forth, their use of standardized test scores or whatever, it's a very small piece of our education. It's an important piece, but it's by no means representative.

Kyle Beltramini (31:33):

I agree. Whenever anybody asks me about colleges to look out for, I always use Florida Atlantic University just as an interesting data point because they graduate more Pell eligible students than the entire Ivy League put together. So when we're talking about what are schools doing to help support students for economic mobility, I don't look to the Ivies because they're an important part of American higher education for sure, but they take up just so much oxygen in the discussion.

David Eubanks (31:57):

Right. We just had Raj Chetty on campus a week or two ago, and he's a well-known researcher in economic opportunity, including higher education, and I agree. For the general well-being of the population, it's those schools that are providing economic opportunities to a wide swath of students who ultimately are probably doing the best work.

Kyle Beltramini (32:24):

So getting back to these soft rules that you had been talking about. There is one particular topic that comes up every now and then on the discussion of accreditation that I don't think gets enough light on it, shall we say. It's this idea of continuous or incremental improvement that I see a lot of accreditors back into their standards when assessing institutions. I know this is something we've chatted about before. Do you want to talk a little bit about what that specifically is and how it works?

David Eubanks (32:51):

Sure. Continuous improvement is a part of the institutional effectiveness movement, the idea that we use data to continually improve things. So on the manufacturing line, we're finding out why defects are happening and we're stopping that from happening so that we get 99.99% no defects, or something like that. So continuous improvement was the idea, well, we continually measure it and we'll continually fix things as we see them so that we're continually improving. But unfortunately, there aren't very many aspects of education that we can measure with such precision that we can trust data over time to even say whether or not we're improving.

(33:31):

In my mind, it's just a convenient fiction that we've told ourselves for decades, and we've been telling it to other people that we're continually improving. But when I've asked on the public record, "Well, if you've been continually improving learning for decades, how much has it improved? Give me a number." There's just no way to do that. And if you look at the actual research, it suggests that what's actually happening is pressure on enrollment and pressure on academic security, professors, is eroding the quality of grades. In other words, we're not holding students to the same level of academic rigor as we used to. So they're actually, students are probably are graduating knowing less, not more, or continually ... Well, you get the idea.

(34:19):

The benefit, there is a positive, there's a silver lining there, in that the graduation rates have increased. But I don't think any of the accreditors, at least the large ones, could make a real credible numerical case that learning is improving because of these institutional effectiveness measures.

Kyle Beltramini (34:38):

Yeah, this is a bit of a pernicious pressure that's being placed on institutions. It gets at the heart of the mission of a lot of these colleges and universities to disseminate knowledge. We just talked about how a lot of these research institutions will get a lot of the air in this conversation, but in reality what isn't being discussed is the student learning. Research is important and it's an incredibly valuable part of American higher education, but at the same time really, you have to wonder, is the average student getting a better case now than they were 30 years ago?

(35:09):

We've seen tons of advancements in technology, since the COVID pandemic in particular, distance learning becoming more and more prevalent. But has it actually benefited the students? What are the learning outcomes? Are we doing any nationally normed assessment that allows us to say X school is doing a good job incorporating something like distance learning into the curriculum, while Y school is doing a worse job? I haven't really seen any broad scale analyses like this being done across sectors. Every now and then, you'll see a single person at a single institution trying to talk about grade inflation. But you'd figure that the accreditors would have more to say there, as they're the guarantors of academic quality.

David Eubanks (35:45):

Yeah. One of the weird things is that the institutional effectiveness movement was new so things had to be done in a new way. Of course, grades were not new. This is my interpretation. So colleges have been effectively discouraged from using course grades as a unit of analysis for learning. Now for sure, course grades have some problems, but it's not like they're totally worthless. So I think part of the reason that we've seen grade inflation, or at least not been able to tie grades to learning more effectively, is that it's just been ignored for decades.

(36:21):

And I'm trying to make a case now that the accreditors should rethink that. I think this is an easy win for them. It's not really easy to communicate to the public how we could think that grades are not associated with learning. I don't think that it's a good idea to try to make that argument to the public. Jeff Denning and his colleagues produced the research I was mentioning earlier. I think the title of the Chronicle article is The Grade Inflation Discussion We're Not Having, or somebody like that.

Kyle Beltramini (36:52):

Now, we've gone over a lot of issues with accreditation, as well as things accreditors could do better. I'm curious if we can put a cap on this. So if I gave you absolute authority to redesign our entire system of higher education accreditation tomorrow, what do you think would be the number one thing that you would do?

David Eubanks (37:10):

Well, I've read enough history to know that that would be a bad thing to do.

Kyle Beltramini (37:14):

I think you might be right.

David Eubanks (37:16):

I don't want absolute authority. I do have a suggestion, though. And that is that this idea of institutional effectiveness was a good idea. I've disparaged it a little bit because it just hasn't been implemented in a way that's really effective. But the idea that we pay attention to what we're doing, using a little bit of statistics now and then, is not a terrible idea at all.

(37:38):

So I think one thing that accreditors could do to make themselves more aware of their own operations is to constantly assess the effectiveness and reliability of their standards. I say this as a reviewer because there are some standards that I really don't know how I could find an institution out of compliance unless they violate some formatting rule, or they didn't give us this required policy. But there are some important standards that I think there's not much agreement on what they mean and that doesn't necessarily have to be the case. So accreditors could assess the reliability of these standards by, for example, producing a bunch of examples, giving them to some reviewers, seeing how many of them agree on whether these pass or fail. Simple like that.

(38:31):

And on the other side, on the receiving end of this, we could be constantly surveying the membership, the people being accredited, as to what they think of the standards. Do you think it's legitimate? Do you think you understand what it means and how to comply with it? Do you think the standard of review is meaningful, do you think it's reliable, and so forth? This would tell us a lot because what happens otherwise is we just informally know that, "Yeah, this standard's just going to depend on who you get as a reviewer, you just have to suck it up." You get a bad reviewer, you're going to have a bad day, but ultimately you can dig your way out of it. It doesn't have to be like that.

(39:09):

Well, I can give you a real relevant example. Whenever we do survey work it's similar because survey questions, some of them are not very good, they're not very reliable, and some of them are quite useful. And we want to be able to tell the difference because I don't want to waste this valuable survey real estate on a question that isn't very good. So we constantly assess the quality of every survey item. Is it telling us anything? Is it reliable, and so forth? And then we change it or eliminate it if it's not working. And the same thing could be done for accreditation review.

Kyle Beltramini (39:42):

It does seem, however, that we're getting into the territory of who assesses the assessors. So is this something that you'd like to see the Department of Education get more involved in? Is this something that, for instance NACIQI should ensure that accreditors are assessing their own standards? Or is that something that would be a better holistic change, where accreditors recognize the need for internal review and apply unilaterally to themselves?

David Eubanks (40:07):

That's a great question and it reminds me of something from NACIQI. I have to emphasize here, I'm not on the committee anymore. I'm not speaking for that committee or anybody else, just myself. But my interpretation while on the committee was that it helps to contextualize what's happening with an accreditor if you have some kind of scorecard. If we know how many schools were cited for different important standards, how many schools were found out of compliance with the student achievement standard? Over the last five years or so, how many schools have voluntarily left accreditation because they didn't feel like they could live up to it, and so forth? That kind of a standardized scorecard I think would be very helpful to the accreditors themselves and I'm sure some of them have internal ones. To some extent, they could be made publicly available, some aspects of it, and some accreditors do some of that.

(41:03):

So I think there is a connection point there, that it could be done internally by the accreditors just as a measure of quality. But also, I think it could be a useful tool to communicate to others to show that we're serious about this.

Kyle Beltramini ([41:16](#)):

And as a researcher, I'm going to vote that we do that immediately as well.

David Eubanks ([41:20](#)):

Amen.

Kyle Beltramini ([41:21](#)):

I can speak to the public benefit right there because any time I try to find any kind of information about accreditation in a particular region or if an accreditor is taking specific action against institution, it does feel like a bit of a crapshoot whether or not that information is going to be publicly accessible in a way that's actually beneficial to understand. There are some standards when it comes to reporting this information, but the language that is used in those statutes gives the accreditors an incredible amount of latitude in what they make publicly available.

([41:54](#)):

So you go to one accreditor and you'll get a great list of every institution that's been put on probation and you'll be able to go to the letter that they sent the institution detailing in a few pages why they were put on probation and what standards they were found to be in violation of and what the remediation plan is. And then you go to another accreditor and it's a one-line bullet point and there's no additional information. And if you send them an email or try to give them a phone call, God help you, if you get through, they'll basically say, "All the publicly available information is available on our website and we'll let you know once something changes." So it does feel as though, from accreditor to accreditor, the transparency issue, it's lacking for some of them.

David Eubanks ([42:30](#)):

Yeah, and I think that would be good for everyone. I do want to acknowledge how much pressure the accreditors are under and how many different ways they're being pulled in, so probably getting more suggestions about what to do is not entirely welcome at this point, just to make that-

Kyle Beltramini ([42:44](#)):

I don't think that they would welcome that whatsoever.

David Eubanks ([42:46](#)):

Yeah. And you didn't really make me in charge of everything, so no danger of that.

Kyle Beltramini ([42:53](#)):

Unfortunately. Unfortunately. If I were to wave a magic wand and give anybody the ability to make a solid change that would help out accreditation in higher education in general, I would certainly put you on the top of the to-do list.

([43:02](#)):

Well, I think that that about wraps it up for me on my questions. I do want to thank you so much for stopping by today, Dave. It's been an absolute pleasure, it always is. And is there anything that you'd like to plug at the end here? Is there a spot where folks can reach out to you or anything that you're doing interesting in the near future?

David Eubanks ([43:22](#)):

I'm working on some geeky stuff. I'm interested in inter-rater agreement and how it relates to how we perceive reality. And that's at kappazoo.com, if you're interested in that kind of statistic. You're probably not, but there it is.

(43:37):

It's been a real pleasure, Kyle. I really appreciate this invitation, and loved the conversation and look forward to the next one.

Kyle Beltramini (43:43):

Yeah, let's make this the first of many. Thanks so much for stopping by.

David Eubanks (43:47):

Thank you. Appreciate it. Bye.