## Transforming Institutional Accreditation in U.S. Higher Education

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This paper explores how institutional accreditation for higher education in the United States might be substantially re-envisioned to create a more effective system of quality assurance focused explicitly on the assessment of student learning as the essential manifestation of quality for all types of institutions, while simultaneously preserving accreditation's traditional role of providing a stimulus and vehicle for improving academic effectiveness. This is emphatically not a "blue sky" analysis. All arguments presented here are constructed on the assumption that regional accreditors will remain principal actors in the quality assurance space for U.S. higher education and that they will retain their current role as gatekeepers for federal funds. An important implication of this assumption is that existing organizations will, for the most part, need to be transformed or re-purposed rather than new organizations created. Doing this will require a deliberate and specific strategy for implementation, as well as a compelling picture of the desired future state of affairs. While the focus is mostly on regional accreditation, the reforms suggested have implications for national and faith-based accreditors as well.

The first part of the paper provides a context for discussion in three sections. The first section provides a brief overview of the history of accreditation as the nation's principal quality assurance mechanism for higher education. This history is important, because it illustrates both the possibilities and limits of organizational change: any future transformations must be delimited by what the uniquely American "system" of quality assurance, and the wider organizational and cultural ecology of higher education within which it is located, can practically accommodate. The paper's second section then provides a comparative perspective by reviewing some key features of several national approaches to quality assurance for higher education, including U.S. regional accreditation. Doing this helps avoid the kind of policy myopia that has become typical of discussions of higher education in the U.S., which tend to proceed in ignorance of approaches that have been successfully put in practice in other settings. Third, the paper describes six significant changes in this ecology that increasingly constrain the ability of the accreditation system to function as currently configured. If these trends continue as expected, these ecological changes will within less than two decades render much of what accreditors currently do irrelevant.

The second part of the paper describes specific shortcomings of the current accreditation system and proposes a set of systemic reforms intended to address these shortcomings. A first section reviews several critiques of regional accreditation that have emerged in recent years, concentrating particularly on those that have arisen since the report of the so-called "Spellings Commission" (USDOE, 2006). The second section then systematically reviews eleven specific changes in accreditation structure or practice aimed at narrowing the focus and improving effectiveness of the process. This argument assumes a planning horizon of at least ten years because some of these reforms will require changes in federal law or regulation, and virtually all of them will require changes in standards and review processes adopted

voluntarily by accreditors themselves. Accordingly, the final section examines implementation issues and proposes concrete steps that can be taken to further the proposed agenda immediately and in the near term future.

### **Background and Context**

### A Brief History of Accreditation in the U.S.

Voluntary accreditation has been a major feature of the higher education landscape in the U.S. for more than a hundred years. The first regional accrediting organizations were put in place to distinguish "collegiate" study from secondary schooling and all had begun recognizing institutions as "accredited" according to defined standards by the 1930s. Organizing their scope on a geographic basis made sense at that time because institutions in different parts of the country had recognizably different structural and cultural characteristics and proximity rendered travel easier to engage in peer review. By the mid-1950s, the current approach to accreditation emerged, centered on examining each institution against its own mission. Its principal components included a self-study conducted by the institution organized around the accreditor's standards, a multi-day site visit conducted by a team of peer reviewers, and a recommendation of accredited status (generally for ten years) by a regional commission. While accredited status awarded through this process thus constitutes a public signal of an institution's quality and integrity for potential students and members of the public, this established accreditation process was never explicitly designed for public accountability or to inform student choice. Instead, the primary purposes of the process were to establish minimum standards and to help institutions improve through systematic self-examination and external review.

When the federal government began systematically investing in higher education with the Second GI Bill in 1952, it sought a way to examine the suitability of individual colleges and universities to act as stewards of federal funds and their ability to provide an education of quality for the students who spent federal money to attend. Accreditation was consequently called upon officially to play this role—an assignment that was formalized and extended by the original Higher Education Act (HEA) of 1965. This was the origin of the current "gatekeeping" function played by institutional accreditors: institutions must be accredited in order to participate in federal student aid programs; in turn, accreditors playing this role must be "recognized" by the federal government on the basis of the standards and review processes they apply to institutions judged against a set of established federal criteria. Currently, this recognition function is performed by the National Advisory Committee on Institutional Quality and Integrity (NACIQI).

Over the years, these criteria for recognition have become increasingly specific and compliance oriented with each Reauthorization. A decisive tilt toward requiring accreditors to play a more aggressive accountability function occurred in the 1992 Reauthorization. This required accreditors to focus greater attention on examining explicit evidence of educational quality and to review a growing array of federal regulations and procedures at an increasingly fine level of detail. Also over the years, the salience of evidence of "student academic achievement" (in the words of the HEA) has steadily increased as a required part of the accreditation process. These developments arguably culminated with the report of

the Spellings Commission in 2006, which strongly suggested that institutions and accreditors use comparative outcomes measures to help determine academic quality, although the report stopped short of mandating these.

This history demonstrates both the contingent and evolutionary nature of developments in accreditation in the U.S. over time. On the one hand, particular historical events and deliberate policy interventions have sparked changes in accreditation standards and review processes on an occasional basis. On the other hand, the overall pattern of change has remained seamless, with each successive structural configuration evolving into the next with few visible breaks with the past. Future attempts to change accreditation, although hopefully more intentional, will likely conform to this pattern.

# U.S. Accreditation in the Context of Global Quality Assurance Practice

Although quality assurance practices for higher education share common purposes across the globe, how each nation's approach is structured and the features and conduct of particular institutional and programmatic review processes differ substantially across national contexts. U.S. accreditation shares many features with quality assurance practices elsewhere, but differs in significant ways as well. Understanding these similarities and differences—and the constraints that each country's culture and context establishes to govern the particular changes that are allowable—thus constitutes an important prerequisite to any consideration of changed future practice.

Figure 1 – Features of Selected Quality Assurance Agencies

	Agency						
Attribute	U.S. Regionals	QAA (England)	AQA (NZ)	TEQSA (Australia)	Netherlands QA		
Scope	Institutions in Designated Geographic Region	Higher Education Providers in Country	Higher Education Providers in Country	"Registers" Institutions and "Accredits" Academic Programs Worldwide	Providers and Academic Programs Worldwide on a "Client" Basis		
Funding	Memberships and Fees	Indirect government support, memberships and fees	Fee for Service	Fee for Service	Fee for Service		

Domains	All Areas of Operation	Academic Quality	All Areas plus Periodic Focus on Teaching or Research	Finances, Staff, Students, Regulatory Standing	Academic Quality
Review Cycle	7-10 Years	5 Years	Varying Cycles but Usually 4 Years	7 Years	No Fixed Schedule
Review Processes	Self Study plus Site Visit by Team	Academic Audit	Self Study plus On-Site Audit	Staff Review plus Possible Site Visit	Quality Audit
Reviewers	Peers	Trained Auditors	Trained Auditors	Staff Reviewers	Experienced Content Experts
Actions	Accredited Status or Not	Commendations, Affirmations, Recommendations all offered under three "Confidence Levels"	Commendations, Affirmations, Recommendations	"Risk Assessment" on Four Dimensions	Recognition
Reporting	Typically Not Public, but Changing	Publicly Available on Agency Website	Publicly Available on Agency Website	Publicly Available on Agency Website	Publicly Available on Agency Website

Figure 1 presents key features of U.S. accreditation<sup>1</sup> with those of four other quality assurance systems in other national contexts including England, New Zealand, Australia, and the Netherlands.<sup>2</sup> The features described include the following:

- <u>Scope</u>. This feature refers to the geographical boundaries of the jurisdiction within which and the type(s) of educational entities about which quality judgments are made including distinctions among institutions, schools, departments, and programs as well as further distinctions among degree levels (e.g. associates, bachelors, masters, and doctoral/first professional) and types of institutions (e.g. proprietary or faith-based institutions).
- <u>Funding</u>. This feature refers to how quality assurance structures are funded and maintained and operations sustained. Although many quality assurance agencies employ a mix of different

<sup>1</sup> Although there are some differences across the seven regional accrediting commissions in the U.S., elements are amalgamated for the purpose of this analysis.

<sup>2</sup> The elements of this taxonomy were developed in a project on comparative quality assurance systems conducted by Ralph Wolff through funding from the Knowledge and Human Development Authority (KHDA) of Dubai and Laureate Education (Wolff, 2014).

kinds of support, principal categories include public (government) support, membership dues, and fees for service.

- <u>Domains</u>. This feature identifies the particular elements of institutions that are examined to
  determine "quality." Particular elements may include mission and purpose, governance,
  administrative structures, curriculum, teaching and learning resources, funding and budget,
  institutional or programmatic outcomes (e.g. student retention and graduation, further
  education, or job placement), and student learning outcomes.
- Review Cycle. This feature refers to the length of time that institutions are recognized at a given quality status, ranging from annually to a maximum cycle of ten years. Institutions must undergo a full review and quality judgment at least once within a given cycle.
- Review Processes. This feature describes the various methods and techniques that the quality assurance agency employs in arriving at a quality judgment for a given institution. Most agencies employ multiple processes, which include document review, site visits to campuses (physical or virtual), audits, or the use of quantitative performance indicators.
- <u>Reviewers</u>. This feature refers to the types of reviewers who are engaged by the agency to
  undertake reviews and inform quality judgments. Again, agencies may employ more than one
  type of reviewer, depending on the domain that is under review. Types may include peer
  reviewers who are faculty or administrators drawn from similar types of institutions, or
  specially-trained professional reviewers with demonstrable expertise in the domain under
  review.
- Actions. This feature addresses the results of the entire review process in terms of a formal
  recognition of quality. Alternatives may include full recognition as an institution that meets the
  agency's standards or one or more categories short of this ranging from recognition with
  particular conditions (e.g. provisional recognition pending further investigation or recognition
  on some standards or criteria but not others) to denial of recognition.
- Reporting. This feature addresses how the results of reviews are communicated to stakeholders and the wider public. Alternatives here range from full disclosure of all documents (e.g. visiting team reports, agency recommendations, etc.) to simply a statement of accredited status.

As is evident, the agencies listed in Figure 1 operate quite differently across many dimensions. Some recognize academic programs as well as institutions and accredit beyond established borders. Another important difference is in the domains examined. While U.S. regionals attempt to review all aspects of institutional condition and performance, some offshore agencies focus on particular topics, chief among them a focus on academic quality as revealed by student learning outcomes and audits of teaching and learning processes. Review cycles also vary as do the processes used to conduct a review, with a particular focus for non-U.S. agencies on audits conducted by well-trained auditors. Actions taken as a

result of reviews are similarly varied. Almost the only feature in which U.S. regionals resemble offshore practice is that the detailed results of a review are reported publicly, and this has happened only recently.

The primary purpose of a comparative exercise of this kind is to demonstrate that effective quality assurance approaches for higher education can be organized and operate in very different ways. The U.S. is therefore not locked into a particular way of doing things because there is only one good way to proceed. Many options are possible if ways can be found to implement them.

# Changes in the "Ecology" of Higher Education Affecting Accreditation

Practices have to some extent changed with the times, but most of the defining features of U.S. accreditation were developed more than fifty years ago in an environment that was dominated by face-to-face synchronous instruction by single instructors, bricks-and-mortar facilities, and little use of technology beyond textbooks and blackboard analogs. If current trends continue, in contrast, college students in 2025 will participate in new kinds of learning experiences, will access new kinds of learning resources, and will deal with a broader range of providers than ever before. Meanwhile, providers themselves will harness new technologies, will face escalating demands for performance, and will be forced to operate in an increasingly seamless global marketplace for higher education. Together, these conditions constitute nothing less than a "new ecology" for higher education, whose characteristics are increasingly removed from the environment within which current accreditation approaches evolved. As a consequence, they are bound to pose challenges to these approaches. This final background section examines some of these changes and the specific challenges that they pose to current accreditation practices.

New Kinds of Providers. One of the most rapid and striking developments of the past ten years has been the growth of new kinds of postsecondary providers. Pure distance-delivery institutions are becoming more common and, according to the National Center for Education Statistics, the for-profit sector now serves over thirteen percent of the nation's undergraduates. Particularly striking has been the growth of some for-profit institutions that have doubled enrollment annually over multiple years. Such rapid growth raises fundamental questions about the ability of such institutions to match enrollment increases with necessary infrastructure and breadth of administrative experience. At the same time, the for-profit business model is not well understood by regional accreditors and poses challenges to established notions of governance. Most radically, some providers are not higher education institutions at all: expansion of corporate training opportunities and the growing number of resources that learners can access on their own now enable a dedicated "student" to master all the material contained in a baccalaureate program without attending an organized institution of higher education. These developments are aided—and accelerated—by a growing array of independent assessment opportunities that enable learners to demonstrate mastery of particular proficiencies including credit by examination and prior learning assessment.

Accreditation standards originally developed in an era dominated by face-to-face classrooms and faculty-centered approaches to teaching and learning are only now beginning to shift to address these new providers. In parallel, standards and review processes evolved primarily to address traditional instructional and scholarly activities are out of step with "institutions" for which awarding degrees and certificates in the absence of visible "teaching," let alone research and creative activity, is the dominant activity. Finally, accreditation as currently organized has no mechanisms at all to examine the quality of independent third-party assessment processes that are increasingly used to certify mastery outside the auspices of formally established colleges and universities.

- New Patterns of Participation. Second, the dominant pattern of college attendance in America no longer has individual higher education institutions at its center. Several dimensions of this dominant pattern can be discerned, some established and some emerging. First, Department of Education longitudinal surveys have for twenty years reported that the majority of students earning a baccalaureate degree attended two or more institutions in doing so, with a fifth attending three or more. These developments are raising issues about how learning transfers from one institution to another in a cumulative and coherent fashion as a student works toward a credential. Adding to this fractionalization, some parts of an institution's curriculum may be developed and delivered by third-party providers—raising parallel questions about "transfer" of content within the curriculum. For-profit companies such as StraighterLine, for example, allow institutions to essentially outsource many commonly-taken lower-division courses that are required to earn a baccalaureate degree. The growing availability of credit-bearing courses on the web through modalities like Massive Open On-Line Courses (MOOCs) will only add to this trend. Both situations render accreditation's dominant paradigm of accrediting individual institutions increasingly obsolescent and demand greater attention to how institutions ensure that quality is protected when so much of the instructional process is outside their direct control.
- Changing Demographics. Meanwhile, the composition of America's student body is beginning to mirror its wider population with respect to race and ethnicity. African American and Hispanic students comprise over 27% of current college students. Most of this growth is in the youngest population quartile which is about to enter college. Despite their best efforts, established colleges and universities do not have a very good track record of retaining such students into their second years of enrollment and seeing them through to graduation. Because student success among traditionally underserved populations will be increasingly critical to maintaining baccalaureate degree production in the coming decade, accreditors must pay particular attention to statistics on student success, disaggregated by race/ethnicity and gender, and to using the discussions generated by reviewing such indicators to refocus institutional attention on targeted retention and academic enhancement programs.

A New Paradigm of Teaching and Learning. Also fading into history is the traditional academic calendar based on fixed time-based terms (semesters or quarters) and one-way transmission of content. In contrast, the emerging new "paradigm" of teaching and learning—best illustrated now by a handful of competency-based institutions like Western Governors University (WGU) or the University of Southern New Hampshire—is based on a mastery model in which students make academic progress by successfully completing, at their own pace, successive examinations, demonstrations, or performances. In contrast to the traditional seat-time approach, this model is not only asynchronous, but it is also characterized by a wide diversity of individual learning experiences. No two students at WGU, for example, will have engaged in the same "curriculum," although all will be expected to meet common outcomes standards. At the opposite end of the continuum, another feature of this new paradigm of teaching and learning is characterized by far more standardized and structured learning experiences built using insights about how people learn provided through cognitive science. Institutions employing this mode, like the British Open University and many U.S. for-profits, rely on a centrally-developed, standardized curriculum delivered by adjunct faculty or at a distance.

By 2025, it is very likely that a majority of the nation's college students will be experiencing one of these two transformed modes of provision. Both of these approaches challenge accreditation's traditional view of instructional quality based on resources and processes. They also require established standards of mastery based upon an agreed-upon array of intended learning outcomes frameworks aligned with models like the Lumina Degree Qualifications Profile (DQP) or the Association of American Colleges and Universities (AAC&U) Liberal Education and America's Promise (LEAP) outcomes. Whatever their form, they irrevocably move evidence about student learning outcomes to the center of quality assurance.

• A Transformed and Contingent Faculty. For most of accreditation's history, the faculty workforce at all types of institutions was overwhelmingly centered on full-time faculty on a tenure track. Faculty members in these roles are expected to serve as colleagues for one another in developing new courses and curricula, setting academic standards and policies, and engaging to various degrees in scholarship and creative activity. Full-time appointments also meant that most faculty were available to participate in professional development to build their skills in such areas as effective collaborative pedagogy, use of technology in teaching, and assessing student learning outcomes. Since that time, the face of America's faculty has shifted markedly. According to NCES figures, more than a third of the current professoriate consists of part-time faculty hired on a contingent basis to staff introductory or lower-division courses with high student demand. Meanwhile, growing numbers of those employed full-time are not on a tenure track and remain employed on a contract basis as instructors. These trends are especially prevalent at open-admission public colleges and universities and are overwhelmingly the case in the rapidly growing for-profit sector.

In light of accreditation's heavy focus on the faculty role in designing and approving all aspects of the teaching/learning process, and accreditation's historic emphasis on the role of faculty in participatory governance, these trends must be re-examined. Especially salient are questions about how the quality of teaching and learning is monitored and assured when the faculty role is "unbundled" so that different individuals are responsible for instructional design, content delivery, mentoring, and student assessment.

A Global Higher Education System. Finally, the U.S. higher education system is not operating in isolation from those of the rest of the world. Just as students move from institution to institution and state to state with greater frequency, foreign students are coming to the U.S. and U.S. institutions are operating abroad in greater numbers. Distance delivery is accelerating these phenomena and it is likely that 2025 will be characterized by a "flatter" higher education world. Increased globalization has several dimensions that affect accreditation. First, it means that academic standards for undergraduate and master's-level work are converging across national contexts. The Bologna process in Europe is the most visible manifestation of the emergence of aligned global standards, with counterparts in Australasia, as well as Central and South America. To be acceptable abroad, U.S. standards for student learning outcomes will need to be aligned with these new prototypes and be assessed in similar fashions. Another dimension of going global is that the quality of U.S. institutions operating abroad must be assured. At the same time, in order to gain credibility, non-U.S. institutions are beginning to seek and receive recognition from American accreditors. Both of these should entail extending partnerships between American accreditors and other national quality assurance agencies, which need to know what U.S. accreditation entails and what they can expect when dealing with it. Finally, a "flattening" world demands that U.S. college graduates have global competencies including an understanding of other cultures, geographic knowledge, and foreign language skills. One implication of these trends is that these should be added to established lists of generic competencies that accreditors require institutions to teach and assess.

As demonstrated by the past ten years, change can happen quickly and become transformational before those who experience it become aware of the fact. After all, tools that are now taken for granted, ranging from Google to GoToMeeting, were only created in the last decade. This makes it all the more imperative that higher education policy leaders quickly but carefully identify the implications behind current trends and to remake quality assurance structures and practices more suited to emerging realities.

## A Way Forward for Accreditation and Quality Assurance

The balance of this paper proposes changes to U.S. regional accreditation that are intended to align the current system with this new ecology and with a more intentional and deliberate vision of higher education quality centered on concrete evidence of student learning and development. A first section examines a number of prominent complaints about accreditation that have emerged since the Spellings

Commission reintroduced discussion of this important topic some eight years ago (USDOE, 2006). A second section describes eleven comprehensive reforms to institutional accreditation that follow. A final section then addresses the most important challenge of all: what specific steps can be taken to implement these changes?

# **Complaints About Accreditation**

Institutional accreditation has been under fire from a range of commentators almost constantly since the conclusion of the Spellings Commission eight years ago. For the most part, such commentators offer their criticisms without offering any well-thought-through remedies, but the complaints themselves are worth cataloging systematically. Among the most common are the following:

- Lack of Rigor. Probably the most common complaint voiced by critics is that obtaining accreditation is just too easy. Here, some commentators concentrate on portraying institutions that are egregiously deficient in several ways (e.g. graduation rates in the single digits or obvious lack of resources) that nevertheless remain accredited (Carey, 2013). Others cite the fact that so few institutions lose accreditation, in itself, as evidence of lack of rigor (Gillen, Bennett, and Vedder, 2010; Dickeson, 2006). The most common remedies proposed by these critics include establishing stricter standards—generally in the form of quantitative benchmarks on high-stakes performance indicators and establishing multiple levels of accreditation beginning with minimum standards and moving to various kinds of "accreditation with distinction."
- Conflict of Interest. Many of the same critics believe that one reason for lack of rigor is that accreditation is owned and operated by the entities that it is supposed to judge—a situation that, in the words of one, is like "the inmates running the asylum (Gillen, Bennett, and Vedder, 2010)." In their view, this situation creates an inherent conflict of interest that accreditation cannot escape without establishing an entirely different kind of governance for institutional quality assurance centered on an independent (frequently government sponsored) third party organization (e.g. Dickeson, 2006) or relying on market forces (e.g. Vedder, 2004).
- <u>Does Not Inform the Public</u>. One of the claimed benefits of institutional accreditation is consumer protection—the view that accredited status, or the lack thereof, constitutes an important signal to the public that a given college or university is worth investing in or attending. Many observers, however, contend that this function is extremely limited, both because few interested parties know much about accreditation and because accreditors rarely communicate more than just the accredited status of a given institution (Jones, 2002; Dickeson, 2006). As documented later in this paper, this criticism is rapidly fading as regional accreditors develop new ways of summarizing the results of accreditation reviews and making team visit reports and commission action letters available to the public.
- <u>Discourages Innovation</u>. The peer review process that is at the heart of accreditation is inherently conservative because it relies on the accumulated experience of veteran faculty

members and administrators who naturally embody views of "quality" that characterize their own institutions. These perceptions, in turn, are codified in the form of accreditation standards, which are hard to change in the face of conventional consensus. These factors have led some critics to the conclusion that established accreditors constitute barriers to innovation because they reward conformity, so automatically question new forms of instructional delivery (e.g. Carey, 2013). Like the public information complaint, the charge of discouraging innovation has changed a good deal in the past decade as accreditors increasingly recognize for-profit institutions with alternative forms of instructional provision. In doing so, however, accreditors risk once again becoming subject to charges of lack of rigor. One way out of this dilemma is to establish a provisional route for start-up institutions that would give them, under carefully defined conditions, a path to awarding federal financial aid for a limited period of time during which they establish a track record of student achievement that can be used to support formal application for accreditation (Manning, 2014).

- <u>Cost and Burden</u>. Mostly voiced by elite and established institutions that believe that their quality is self-evident, this complaint maintains that accreditation imposes unnecessary costs and burdens on institutions. On the other side, these critics also do not see much added value from engaging in the review process. As a result, they advocate for a quality assurance process that is minimal and based on standard "quality" markers like generous per-student expenditures, high graduation rates, and public recognition.
- Encourages "Compliance" Behavior. This difficulty is more about institutions' reactions to
  accreditation processes than about accreditors themselves. It centers on the common tendency
  for institutions to do just the minimum reporting required to maintain accredited status rather
  than seizing the accreditation process as an opportunity to genuinely improve what they do. In
  contrast, the argument made by critics is to first embrace a culture of continuous improvement
  and compliance will naturally follow as a byproduct (Kuh, et. al., 2015; Massy, Graham, and
  Short, 2007).

Although all but the last complaint are generally advanced colloquially and polemically, there is some truth to them. And they serve to set up a far more basic set of challenges, and a corresponding list of potential reforms, to institutional accreditation that follow.

## **Eleven Comprehensive Reforms**

While they are to some extent interdependent, eleven prominent challenges face institutional accreditation as it is currently practiced in the U.S. Each of these challenges, when analyzed, then suggests a set of corresponding reforms. The challenges are as follows:

1. <u>Purpose</u>. This is about what accreditation is essentially for and the balance of topics addressed by the accreditation process—essentially what aspects of quality are reviewed.

- 2. Governance. This is about how accreditation is organized and who oversees and manages it.
- 3. <u>Scope</u>. This is about the number and type of institutions handled by each of the regional commissions.
- 4. <u>Language</u>. This is about the extent to which institutional accreditors use consistent terminology in their review criteria, in describing their review processes, and in communicating the results of reviews.
- 5. <u>Levels of Recognition</u>. This is about establishing multiple levels of institutional recognition as the outcome of an accreditation review; the current process has only one outcome because the result is that institutions are either accredited or they are not.
- 6. <u>Standard Dashboard Measures</u>. This is about enhancing and standardizing a limited set of quantitative indicators of institutional condition and performance that are assembled and considered by expert panels of reviewers in the course of every accreditation encounter.
- 7. <u>Peer Review</u>. This is about how the peer review process might be usefully supplemented and disciplined to obtain greater consistency and reliability across institutional accreditation reviews.
- 8. <u>Conduct of Review</u>. This is about how the review is actually conducted and the tools reviewers use to gather information to inform their judgments.
- 9. <u>Role of Students</u>. This is about the role that students should play in the accreditation review process to reflect their centrality in the teaching and learning process.
- 10. <u>Balance in Review</u>. This is about the relative scrutiny that the institutional accreditation process places upon institutions with a good track record on the one hand and a track record of troubled condition or performance on the other. The argument is that the former need relatively little attention, while the latter need relatively more.
- 11. <u>Public Reporting</u>. This is about the extent to which the conduct of accreditation review processes and the results of these processes for specific institutions are made visible to stakeholders and the wider public.

While they are to some extent interdependent, these challenges and proposed remedies are sufficiently separable as arenas for action that progress can be made on each independently. More important, progress on each can be made without impairing accreditation's historic roles of stimulating quality improvement and disseminating best practices. And such progress can also be made without imposing a government (federal) solution. Cutting across all eleven, moreover, are three themes that constitute a

set of desired future characteristics of any system of quality assurance for U.S. higher education. These themes are:

- Emphasis on Results. Proposals here are designed to more fully focus accreditation standards and associated review processes on what the student *gets* as a result of attendance. This consists of particular combinations of knowledge and proficiencies and may also be manifest in important education experiences while enrolled and behaviors after completion of a course of study. Regional accrediting organizations have made major strides in assessing learning outcomes in recent years, but many of the institutional characteristics they examine are not directly related to performance but instead remain rooted in older views of quality that emphasize resources and processes. This is exacerbated by federal directives that compel accreditors to act as inspectors of relatively narrow areas of institutional practice. This is not a role that accreditors are well equipped to perform and which distracts them from the role of assuring academic quality based on assessment of learning outcomes—a role which only they are able to fulfill.
- Consistency. Proposals here are designed to render the actions taken by accreditors and the results of the accreditation process more consistent with one another both across institutional reviews within their respective regions and, more importantly, across regional commissions. With respect to the former, the large number of institutions that need to be reviewed in some regions and the relatively unscripted nature of the peer review process that lies at the heart of regional accreditation can combine to produce review outcomes that are of uncertain reliability. The situation with respect to the latter—consistency across accrediting organizations—is even more problematic. Different accreditors construct review standards and processes in different ways and each uses its own language to present them. One of the reasons for the emergence of the Voluntary System of Accountability (VSA) and its cousins in the wake of the Spellings Commission was the inability of the higher education sector to paint a consistent and comparative picture of higher education performance. The rising popularity of institutional rankings reinforces this conclusion.
- Transparency. Proposals here are designed to render the accreditation process more understandable to its stakeholders and the broader public. This is arguably the arena in which higher education quality assurance has made the most progress in the U.S. in recent years. All of the regionals have issued more detailed guidance about what institutions should report to the public about their condition and performance, and most have developed (or are developing) mechanisms for publicly reporting the results of reviews beyond simply a statement of accredited status. But transparency is about more than just communication. It includes in addition a commitment to openness with respect to operations—often termed "integrity" in the review standards established by regional accreditors—and a commitment to focusing quality assurance processes on the right things. In this respect, consistency reinforces transparency, as does a clear focus on institutional performance as revealed by evidence of student learning outcomes.

The sub-sections that follow block out the underlying problems that underlie each challenge. They then describe one or more actions that could be taken by various actors to address the challenge—recognizing again, that these actions may involve a decade-long effort requiring coordinated decisions by multiple actors.

• Purpose. There is broad consensus that accreditation has two fundamental purposes. The first, and earliest, is to establish a threshold set of characteristics that delineate "a college"—an institution whose graduates can be assured to be of a certain standard. Although accreditors today cringe at the term "minimum standards," establishing them for purposes of mutual recognition was, in fact, the first purpose of the regional associations (Ewell, 2008). This purpose, moreover, became much more prominent and important when the federal government established accreditation's "gatekeeping" function some fifty years later. The second purpose, which emerged most visibly in the mid-twentieth century led by the North Central Association and which remains the current front-runner among most observers, is to improve colleges and universities and what they do. Under this mantra, the practice of self-study, disciplined by peer review, enables institutions to reflect deeply on their structures and behaviors to identify areas where they might do better.

While neither of these two broad purposes is clearly articulated, they are in important ways fundamentally in conflict. The first is summative. An institution is either accredited or it is not, and this is why accreditors are being continually called upon to establish visible (preferably quantitative) "bright line" standards of performance. The second is formative. Once it is declared above threshold, there is no predicting how, or on what basis, performance might be improved. These two purposes have waxed and waned over the years, with one or another of them dominant for a time. Since the Spellings Commission, the first has arguably been ascending, with accreditors putting in place additional mechanisms to supplement peer review such as reporting statistics and expert panels. But established review processes have, for the most part, remained in place because they are broadly capable of fulfilling both purposes.

Complicating the question of basic purpose, moreover, accreditation is challenged because it purports to be about everything an institution does. Indeed, up until recently, the standards or criteria used to examine institutional condition and performance for all of the regionals were organized functionally under familiar headings like mission, governance, administrative leadership, curriculum, faculty and teaching staff, student affairs, finance, equipment, and physical plant. But with limited time and resources, accreditors cannot in practice review all of these, so choices are made behaviorally about what to examine. The problem is that these choices are not consistent across accreditors or even across individual accreditation encounters from one institution to another; most typically, the chair of the team decides what the central focus of the visit should be or simply parses out these functional standards to individual team members who try to cover them to the best of their ability. In the last ten years some of this has changed. Several regionals, most notably the WASC Senior Commission and the Higher Learning Commission (HLC) of the North Central Association, now have integrated standards

that are not topically organized and are much more focused on performance. WASC Senior has also dropped the comprehensive self-study in favor of a series of analytical essays that are centered on critical aspects of teaching and learning such as the meaning, quality, and integrity of the degree.

This progress is admirable, but accreditation needs to create even more focus in the coming years if it is to be an effective vehicle for quality assurance and lever for institutional improvement. Teaching and learning at the undergraduate level is a core function for every college and university—arguably, *the* core function. It is the only significant activity shared by every institution of higher education, from community colleges to research universities. It is also an area in which accreditation already has considerable interest and really can make a difference. No accreditor is going to make Stanford or MIT a better research university, but it can look at learning as a core function shared by all institutions in a region.

What might such a focus actually look like? One change might be that institutions under review would undertake more intensive reviews of the effectiveness of their teaching and learning approaches, especially at the undergraduate level. Although occasioned by accreditation, such reviews would be undertaken from a point of departure that begins with an institution and its faculty taking visible collective responsibility for teaching and learning as opposed to a "compliance" response that merely seeks to satisfy the accreditor (Kuh, et. al., 2015). A second probable characteristic would be a much clearer focus on what Bill Massy and his colleagues call "Academic Quality Work (AQW)," typically involving audits and similar evaluation techniques that "drill down" into the actual academic experiences of typical students in a sample of programs and as they experience general education courses (Massy, Graham, and Short, 2007). The resulting review by an external team would thus look more like the current audit approaches used by such organizations as the Quality Assurance Agency (QAA) in England or by the University Grants Committee in Hong Kong. A third possible ingredient would be for federal recognition of accreditation to draw more attention to student learning. At present, broad guidance is provided by the HEOA's Part H, Section 496 (a) (5) (A), which contains the appropriate caveat that institutional missions and distinctions should be taken into account in developing standards of student academic achievement. But paragraph (A) does not mention student learning at all, only such indirect indicators as performance on state licensing examinations, course completion, and job placement. It probably should.

A final ingredient here would be to extend accreditation's reach beyond institutions entirely to embrace the growing number of alternative routes to earning credentials and credits such as credit by examination, PLA, and outsourced provision in the form of MOOCs or StraighterLine. Such third-party providers constitute substantial instructional partners for many institutions these days but are not generally addressed in accreditation's standards and review processes. At the very least, accreditors should examine how an institution's decision to adopt them was made, the role of the faculty in this decision, and how the institution satisfies itself that it is receiving a quality product.

Changing the focus of U.S. accreditation in this manner will not be easy and there are clear limits about how far down such a path current accreditors can go. From a purely administrative standpoint, for example, the USDOE requires recognized accreditors to undertake an "inspection" function in a growing range of administrative areas that have little to do with the quality of teaching and learning. Examples include evidence of on-line student attendance and reporting of cohort default rates. More important, accredited status continues to serve as a signal to stakeholders ranging from policymakers to parents that a given institution is reputable in everything that it does. Confining its domain of interest to only one institutional function, however important, would erode this role. On the other hand, the current situation in which accreditors must stand behind judgments of comprehensive quality is increasingly untenable given resource constraints and the growing complexity of institutions. In this light, any steps toward moving the focus of the process more toward the quality of teaching and learning would probably be in the right direction.

• Governance. Institutional accreditation currently operates within a governance environment that is at best loosely-coordinated. "Mainstream" regional accreditation operates through seven independent membership-based commissions. These seven commissions attempt to work together through the Council on Regional Accrediting Commissions (C-RAC), which is a voluntary association with no permanent staff or facilities. National accrediting organizations comprise three organizations that accredit career schools and programs and four faith-based accreditors that accredit institutions with religious missions. All of these accreditors are subject to oversight by the U.S. Department of Education (USDOE) and are periodically reviewed and recognized as "gatekeepers" through the National Advisory Committee on Institutional Quality and Integrity (NACIQI). All may also seek voluntary recognition by the Council for Higher Education Accreditation (CHEA), established in 1996, which operates a parallel recognition process. This rather Byzantine structure of governance and coordination evolved incrementally for many understandable reasons (Bloland, 2001, Ewell, 2008). But it makes it extremely difficult for those involved in quality assurance to speak with one voice in matters of policy.

Whether national or regional, all institutional accrediting organizations (and programmatic specialized accreditors, for that matter) are membership organizations. So a second governance problem centers on the difficulties inherent in relying upon a membership organization to play an accountability role with respect to its members. As soon as accrediting organizations were accorded such a role with the Higher Education Act of 1965, critics began pointing out that such an arrangement involved an inherent conflict of interest (Newman, 1973). One result has been a recurring *leitmotif* of complaint centered on the perception that peer reviewers cannot, by definition, be hard on one another because of the familiar dynamic of "you scratch my back and I'll scratch yours" (Ewell, 2008, p.77).

What might be done to rationalize governance arrangements for institutional accreditation? One possibility might be to create a new free-standing federally-chartered (but not federally owned) body to oversee and coordinate institutional accreditors. The form of such an

organization could be something like the Federal Reserve Board, the Federal Communications Commission, or the Securities and Exchange Commission—funded, all or in part, from federal sources, but with an independent charge and board of directors. This structure also somewhat resembles that of quality assurance organizations in other countries. For example, the Quality Assurance Agency (QAA) for England is established as a not-for-profit corporation separately chartered and governed from government with indirect support from government through the Higher Education Funding Councils. In parallel, one proposal that emerged during the Spellings Commission was for the establishment of a "National Accreditation Foundation" through Congressional legislation as a private-public partnership (Dickeson, 2006). Similar proposals that rely on a wholly not-for-profit structure for governance in U.S. accreditation have recently been surfaced, such as charging the National Academies (consisting of the National Academies of Science, the National Academy of Engineering, the National Institute of Medicine and the National Research Council) with such a role (Dill, 2014). Creating such an authoritative freestanding nonprofit body to coordinate and oversee regional accreditation was also one of the recommendations of the National Policy Board on Institutional Accreditation (NPB) in the wake of the 1992 amendments to the HEA (Bloland, 2001). This recommendation eventually yielded CHEA, an organization with an altogether different mission and set of activities from what was originally envisioned by the NPB. But whatever alternatives are proposed, the need for strong independent coordination of accreditation remains a central issue for quality assurance in U.S. higher education.

• Scope. There are currently seven regional accrediting commissions operating in six geographic regions. The regions are not rationally organized and contain radically different numbers of institutions. The North Central region, for example, includes nineteen states, two of which border Mexico and the Western Association embraces just two states as well as a number of Pacific territories. The largest regional accreditor has review responsibility for more than 1300 institutions and the smallest for fewer than 200. One only addresses two-year institutions and the rest accredit all kinds of institutions. (An eighth, recently defunct, also only addressed two-year institutions.) These differences in scope evolved by happenstance over many years; as the ACE Task Force report put it, "the current regional basis of accreditation is probably not the way America would structure [quality assurance] if starting from scratch (ACE, 2012, p.18)."

This current approach to defining scope has two drawbacks, one perceptual and one practical. The perceptual problem is that this peculiar assignment of review responsibilities geographically and with respect to type of institution is one of many things that currently impede public and stakeholder understanding of what accreditors do. The fact that New Mexico and Arizona are in the "north central" region seems strange to the casual observer, and the distinction between two-year and senior institutions in the Western region means that otherwise integrated institutions like the University of Hawaii System must deal with two different accreditors. The less apparent practical drawback is that the widely divergent numbers of institutions that each regional accreditor is responsible for reviewing cannot help but affect the level of attention that a given accreditor is able to devote to a given institution. For example, some regionals send

members of staff on every site visit, while others only occasionally do so. And some commissions act as a committee of the whole in making accreditation decisions, while others rely on a decentralized decision making approach because they must examine and pass judgment on so many institutions.

There has been no shortage of proposed actions to address this situation. Probably the most prominent is to re-constitute the scope of accrediting organizations on the basis of institutional type instead of geographic region. This idea has emerged several times since the Spellings Commission and was a central feature of the proposed national accrediting structure advanced by the NPB in 1992-93 (Bloland, 2001). On the face of it, the idea has some merits. Many now argue that in a postsecondary instructional space that increasingly transcends "brick and mortar" institutions, geographic location has become irrelevant. And there are some types of institutions—major national research universities, community colleges, and certain specialpurpose institutions—for which a persuasive argument can be made for such an approach. But as soon as accreditation by institutional type is seriously examined in the light of today's rapidly changing postsecondary environment, significant difficulties become apparent. Increasing numbers of two-year institutions now grant bachelor's degrees—a fact that makes the distinction between two-year and senior commissions increasingly awkward. At the other end of the scale, recent changes in membership in the Association of American Universities (AAU) demonstrate how difficult it is to maintain boundaries based on a fixed set of institutional characteristics (Lederman and Nelson, 2011). The vast majority of institutions in the U.S., moreover, lie somewhere in the middle, where boundaries between institutional types are far more difficult to establish and maintain.

In the light of these conditions, the decision of the ACE Task Force to recommend leaving the geographic basis of regional accreditation intact appears wise. But this does not mean that nothing can change. First, the geographic scopes of regional accreditors have changed in the past for a variety of historical reasons. For example, the North Central region originally encompassed ten states in contrast to its current nineteen, and Arkansas began as a state in the Southern accreditation region but passed to the North Central region in the 1920s (Ewell, 2008, p.30). So there is nothing to prevent regional accreditors from revising their geographic scopes by mutual agreement if persuasive public benefits for doing so are made clear. A second potential avenue is to harness a developing "marketplace" for accreditation for institutions that have a choice of accreditors. For example, a large for-profit distance-education provider recently changed its accreditor from the Higher Learning Commission of the NCA to the WASC Senior Commission. Of course, there is also a down-side to creating a competitive marketplace for institutional accreditation: institutions may naturally seek accreditors with the least rigorous requirements, initiating an unproductive "race to the bottom" with respect to standards. But this can be avoided by encouraging accreditors to develop distinctive niches for some of their processes based on qualities that institutions will genuinely want to pursue.

Because of their long and established histories, the respective scopes of institutional accreditors will be hard to change, which is why adopting a long-term, incremental, and voluntary

perspective is important. But current accreditors and policy bodies like NACIQI can play a key role in promoting incremental change by re-examining the current scopes of recognized accreditors to promote more rational regional boundaries and to increase positive and beneficial competition among accreditors for institutional members.

• Language. Although the seven regional accrediting commissions have evolved roughly similar review processes, the language in which they communicate these central components is unique to each organization (Gaston, 2014; Ewell, 2008). For example, statements of the fundamental expectations that accreditors have established for an institution to be accredited are usually termed "accreditation standards" but are also called "criteria," "requirements," or "commitments." This reflects the fact that these organizations have a long history of independent evolution and have had no compelling imperative to develop a standard terminology. Like scope, this lack of linguistic consistency across accreditors has both perceptual and practical implications. With regard to the former, higher education's stakeholders find this lack of comparability confusing because it is not clear whether or not different accreditors using different labels are referring to the same institutional characteristics or areas of performance, or something different. At the practical level, meanwhile, lack of a common language means that it is not clear that institutions are being held to equivalent standards of performance across accreditors. They may be, but without definitional clarity, it is hard to tell.

This challenge is particularly apparent in the critical arena of student learning outcomes. All institutional accreditors have established broad lists of proficiencies that the graduates of accredited institutions are supposed to possess. But the language and contents of these statements differs across accreditors, and they are not very precise or well specified in any case.<sup>3</sup> This makes it hard for higher education's stakeholders to know what a given award actually means with respect to what its recipients actually know or can do. It also provides accreditors themselves with little guidance in what they should be looking for when they examine the quality of student learning.

Possible approaches to addressing this challenge can be pursued at multiple levels. The most basic is for accreditors to establish a common vocabulary for describing some of the most basic aspects of the institutional accreditation process. This should embrace what to call the statements of expectations against which institutions will be reviewed (e.g. "standards"), the document(s) or presentations submitted as evidence that these expectations are met (e.g. "self-study"), statements of what degree recipients should know and be able to do (e.g. "student learning outcomes"), and the actions taken as a result of a review (e.g. "warning"). It is gratifying that progress has been made on the last of these with the recent adoption of common terminology on accreditation actions on the part of C-RAC (C-RAC, 2014). Similar progress to encourage accreditors to agree on terminology on the rest of the list above could be

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<sup>&</sup>lt;sup>3</sup> See Adelman (2014). Adelman identifies wide disparities across accreditors in both the form and substance of learning outcomes statements.

encouraged by NACIQI and CHEA through their ongoing agency recognition processes and, over the long term, in changes to the language of Part H, Section 496, (a) of the HEOA.

At a deeper level, accreditors can be encouraged to voluntarily align the substance of what they examine in the course of a review, especially in the realm of student learning outcomes. This is an area of some delicacy and I am emphatically **not** suggesting that a **particular** list of student graduation proficiencies be written into law. But accreditors should be encouraged to map or otherwise justify their own core expectations for institutions with respect to learning outcomes to some kind of external reference point like the Lumina DQP or AAC&U's LEAP outcomes. The former has undergone a good deal of experimentation by institutions including the involvement of four of the seven regional accreditors<sup>4</sup> and the latter are frequently voluntarily referenced and used by institutions in the course of their accreditation reviews. In both, institutions are encouraged to add or modify proficiency statements consistent with their mission and student clientele. Adoption of an aligned frame of reference of this kind with respect to student learning is very close to what the regional accreditors already have in substance, if not terminology (Nichols, 2004), and would strengthen the public transparency and credibility of institutional accreditation.

• Multiple Levels of Recognition. Currently, accreditation results in only one all-or-nothing outcome: institutions are either accredited or they are not. And because loss of accreditation is an outcome that few institutions can survive because it means that they cannot access federal funds, accreditors are understandably reluctant to take such action. Accredited status, moreover, conveys very little information to anyone interested in institutional condition or performance. If a review finds that an institution is better at some things than at others, there is no way to convey that information. Finally, many institutions are far above minimum levels of compliance and are reluctant to invest much in the accreditation process because they will not be recognized as exemplary.

One way to address these issues is to establish a multi-level accreditation system under which institutions could earn higher levels through exemplary performance or could be simultaneously rated on several dimensions. The first of these was proposed by the National Policy Board on Institutional Accreditation some fifteen years ago (Bloland 2001). Multi-level institutional rating schemes are not uncommon in quality assurance systems elsewhere in the world. For example, the institutional audit process in the U.K. rates colleges and universities on the "level of confidence" the review indicates in their internal quality processes (QAA 2002). This practice resembles bond ratings like those provided by Moody's Investors Service in the financial world—a popular analogy that is cited frequently in the literature on higher education quality assurance (e.g., Ewell, Wellman, and Paulson 1997).

<sup>&</sup>lt;sup>4</sup> One, the Western Association of Schools and Colleges (WASC) Senior Commission has actually written the DQP into its 2013 *Handbook of Accreditation* as one way institutions can demonstrate the "Meaning, Quality, and Integrity of the Degree (WASC, 2013, pp.29-30)."

Assigning multiple levels of accreditation would clearly provide more information about quality to the public and would likely stimulate the engagement of institutions and programs that are well above minimum standards. Indeed, it is hard to conceive of a well-known institution or program with an established reputation for "quality" simply "taking a pass" under such a scheme. Another approach might be for accrediting organizations to develop additional elective review processes, offered on a fee basis on various topics, which institutions could undertake in addition to their basic review. Successful performance would result in an additional certification that might well be of value to the institution—much as the Malcolm C. Baldrige National Quality Award or ISO9001 Certification are of value to corporations. For example, additional in-depth certifications of good practice might be developed in several broad areas of institutional functioning such as finance, quality of general education programming and student support. This would provide a kind of parallel to programmatic accreditation in the disciplines.

To a certain extent, it can be claimed that a multi-tiered system already exists behaviorally, embodied in the actions that accreditors take in the wake of a review. Some, for example, extend accreditation for varying periods of time or require focused visits or special reports, under particular circumstances. But such existing "distinctions" among levels of accredited status are invisible to the public. Formally recognizing and rationalizing such distinctions might be a palatable first step toward a multi-tiered approach to accreditation.

• Standard Dashboard Measures. Institutional accreditors ask for many kinds of evidence in the course of a review including documents, visiting team observations, and quantitative measures of institutional condition and performance. The first two of these cannot, and should not, be prescribed because accreditors need the flexibility to develop lines of evidence based on differing institutional missions and differing issues facing each institution under review. The case for distinctiveness is less clear for quantitative measures of institutional condition and performance such as undergraduate retention/graduation rates and ratios of financial condition that many accreditors require institutions to produce as part of the annual reporting process. While all accreditors require such statistics, they are not defined consistently across accreditors, except for those statistics—like cohort graduation rates for first-time, full-time students—that are already defined by the federal government. The statistics that are included in these annual reports, moreover, are mostly descriptive and few are focused on institutional outcomes.

Lack of consistency across accreditors with respect to quantitative measures has long been a source of complaint by institutions—especially when they have to recalculate commonly used measures to fit the specific definitions required by different actors (e.g. accreditors and states). This discontent has resulted in at least two attempts to create a set of standard definitions for the measures used in accreditation. The first was produced in 1985 for the now defunct Council on Postsecondary Accreditation (COPA) and proposed commonly defined measures in four

<sup>&</sup>lt;sup>5</sup> Such a third-party contract for services to perform quality reviews was among the many recommendations of the Second Newman Report (Newman 1973). A similar publicly disclosed "institutional audit statement" was proposed by Harcleroad at about the same time (Harcleroad 1976, p. 14).

areas—program or institutional descriptors, resources, utilization of resources, and outcomes (Christal and Jones, 1985). The second was published in 2000 and proposed commonly defined measures in the areas of institutional and program descriptors, faculty/staff resources, facilities, equipment and information resources, fiscal resources and activities, admissions, students and enrollments, and outputs (NCHEMS, 2000). So if action were to be taken to align the quantitative measures used in accreditation, there are certainly resources on which to draw.

In many ways more important, some institutional accreditors are beginning to require the use of a small set of institutional performance indicators in the institutional review process. For example, the WASC Senior Commission and the Higher Learning Commission (HLC) both require consideration of institutional retention and graduation rates in their newly-adopted institutional review processes. This makes it all the more important that such measures be consistently defined. The specific proposal here is that a standard array ("dashboard") of ten to twelve performance indicators be developed for common use in the accreditation process. 6 At minimum, these should address retention/completion and graduate placement (in further study and in employment) appropriately disaggregated by gender, race/ethnicity and other relevant student characteristics; financial condition and performance; student/faculty ratios or other productivity statistics such as credit hour generation; and investments in equipment and the maintenance of physical plant. Most state higher education agencies collect such statistics for public institutions and accreditors should be encouraged to research these and/or collaborate with states in their regions in developing such measures. The resulting "performance dashboards" might then be reviewed and commented on by panels of expert third-party reviewers as a number of regional accreditors have already begun to do in the realm of financial measures. Extending this practice might free up expensive on-site peer reviewer time to devote to the main focus of undergraduate teaching and learning.

Going further and consistent with earlier points about assessing and setting standards on a limited set of student learning outcomes, accreditors should set appropriate benchmarks or thresholds on such measures as graduation rates. As some of accreditation's most prominent critics have pointed out, it is hard to defend the accreditation status of institutions with six-year cohort graduation rates of five percent or less (Carey, 2013).

• Peer Review. The process of peer review is central to accreditation as it is currently practiced in the U.S. and there are many reasons why this should remain the case. The strongest case for review by peers is that they can bring to bear considerable expertise, drawn from experience, about what a "high quality" institution of higher education ought to look like. When the array of institutions under review was fairly homogeneous—as it was until the 1980s—this was a powerful argument. A related argument is that peer review provides a visible embodiment of the assumption of collective responsibility for self-governance owed by any profession that serves society. An approach based on peer review is also fairly cheap, at least with respect to

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<sup>&</sup>lt;sup>6</sup> For example, the Council for the Accreditation of Educator Preparation (CAEP) has established a list of eight annual report measures which play a prominent part in its newly-adopted review process (CAEP, 2013).

direct cost. The bulk of the time invested by peer reviewers is contributed service as the regionals pay reviewers only nominal sums to undertake substantial commitments examining materials and visiting campuses. Alternative quality assurance systems based on professional reviewers, as are typical in other countries, must invest heavily in personnel costs and the costs associated with the development of review infrastructures.

Though arguably well suited to an age when U.S. higher education was smaller and more homogeneous, at least two changes in the environment within which it must operate pose escalating challenges to accreditation's heavy dependence on peer review. The first is technical: judging the quality of colleges and universities appropriately today requires levels of knowledge about important topics that typical peer reviewers do not possess. The second is political: in the age of heightened accountability, a process based on peer review looks like an inherent conflict of interest because those who judge performance are drawn from the community that is being judged. Together, these challenges have combined to yield a number of specific drawbacks of peer review that are becoming ever more apparent.

Accrediting organizations do take pains to match the characteristics of peer reviewers with those of the institutions that they will be asked to examine. But colleges and universities have become sufficiently complex organizations that it is difficult to find random members of the academic community who really understand how they function. Lack of technical background and expertise possessed by peer reviewers is even more acute in specific areas of institutional functioning like interpreting and acting on disaggregated graduation and retention data or evidence about the achievement of student learning outcomes. As these topics become ever more prominent in accreditation, accreditors are struggling to find peer reviewers in their regions with the requisite background to examine them.

Part of the reason for this condition is that peer reviewers in U.S. accreditation receive relatively little dedicated training on how to conduct a review compared to the reviewers and auditors who staff quality assurance processes in other countries. Although this is beginning to change, most visiting team members only attend a day-long (or even half a day) orientation session before being deployed for review. This contrasts with the multi-day (and occasionally as long as a week) training regimens experienced by quality auditors in Europe or Australasia.

Some observers have claimed that peer review's significant deficiencies render it unsuitable as a quality assurance tool. But dropping it would go too far because, done well, peer review has much to contribute to both the practice of accreditation and the public perceptions of professional self-regulation on which widespread trust in the academy depend. Instead, calling on institutions and accrediting organizations to take specific steps to improve the peer review process—to "discipline" it, if you will—might help alleviate its most prominent deficiencies (Ewell, 2012). A first step here, as argued earlier, might be to carefully examine what peer reviewers are good at and what they are not, with an eye toward off-loading the latter topics to expert panels. An additional step might be directed at increasing staff presence in on-site

reviews to ensure that team deliberations are focused on the right issues and to provide on-site technical assistance.

In sum, peer review as a central feature of institutional accreditation in the U.S. has vociferous supporters and critics. Taking a balanced position is more advisable. Peer reviewers are good at some things and not very good at others. Accreditors should leave such processes undisturbed in the former and look for promising "professional" alternatives in the latter.

• Conduct of Review. The current way in which accreditation reviews are undertaken has been in place more than sixty years, having been established during what has been termed the "golden age" of accreditation (Ewell, 2008). One pillar of this approach, as described above, is peer review of the institution's self-study followed by a multi-day site visit by a team of peer reviewers. How this team spends its time during the site visit, moreover, is remarkably standard and circumscribed. Most of it is allocated to approximately hour-long group interviews involving two or more team members asking questions of a set of campus representatives who usually represent a common function (for example, a group of department chairs, student affairs professionals, or finance and budget staff). Any balance of the remaining time is supposed to be devoted to examining documents assembled by the institution in a team room that include such exhibits as financial records, course syllabi, strategic plans and associated implementation documents, and minutes of various councils and committees. Team discussions leading to an accreditation decision (if this is the team's function in any case) usually occur hurriedly over meals or late into the night.

Lack of reviewer training has already been noted, where typical U.S. practice contrasts with the far longer workshops provided to site reviewers elsewhere in the world. But the problem with respect to gathering evidence based on more than just group interviews is just as important. Here there are many evidence-gathering approaches drawn from organizational consulting and the social science disciplines that might be used in an accreditation visit. Among them are:

- Mini-surveys. Consisting of only a few closed-ended questions, postcard-sized surveys can be effectively used in large group meetings to quickly gather opinions about the issues facing an institution. If the results can be tabulated quickly, the group's distribution of opinion on these issues can be used by team-member facilitators to shape a meaningful group discussion. This contrasts with the usual way such group meetings are conducted, which is simply to let those with a grievance air it.
- o Focus groups. Most accrediting teams, as noted, conduct group interviews with representatives of institutions and programs in various roles. But these are frequently unstructured and are not deliberately designed to answer questions thought out in advance. Consumer and market researchers, in contrast, have developed focus group techniques that are capable of determining the answers to much more sophisticated questions with far greater consistency and reliability than those generally asked by accreditation teams.

Written protocols for conducting such interviews can also be helpful in achieving these ends.

- Audit Methods. Quality assessment of higher education in most of the English-speaking world adopted the so-called "audit" method in the 1990s (Dill 2000). Modeled on the familiar method of a financial audit, and designed principally to determine if established quality assurance processes are being followed as they were designed, the method consists of choosing at random a few examples of the process—perhaps in a particular program or term—and following "audit trails" through a review of actual documents and files. Audit methods were also the central feature of one of the most prominent analyses of how institutional accreditation might be improved (Graham, Lyman, and Trow 1995).
- o Field Observation. The disciplines of anthropology and organizational behavior have evolved a range of field observation methods for extracting useful information about how a society or organization is working, based on unobtrusive observation. Techniques applicable to accreditation site visits may include counting the numbers of people doing things in particular settings (e.g., traffic at the registrar's office, including service speed and lines, how students appear to be using the library, etc.), listening to group interactions at meetings or reading bulletin boards. Most accrediting teams spend most of their time listening to people rather than looking at things. It may pay, in contrast, to have one member of a team that is devoted to purposive "walking around" instead.

The lack of appropriate tools available to review teams is perhaps more serious when it comes to achieving team consensus about its conclusions. General opinion is sometimes dominated by the views of the chair or a few strong individuals, so decision aids that can help overcome this tendency in order to mobilize and discuss *all* of the evidence that the team has uncovered can be helpful. Group aids to decision-making frequently used in corporate strategic planning, such as nominal group technique or multiple voting, can be helpful here. So can detailed templates about how teams should structure their time together.

In short, lack of appropriate tools, together with training in how to use them, is perhaps the single biggest drawback to the effective conduct of accreditation reviews under the current U.S. approach. And this condition could be remedied without significant shakeups in the current role and scope of regional accreditation.

• Role of Students. In contrast to what occurs in quality assurance practice for higher education outside the U.S. (especially in Europe), students do not play much of a role in U.S. accreditation. Typically, an accreditation visit features one open meeting with students who are usually selected for the role they play in campus life (e.g. student government, leaders of clubs or student organizations, etc.) or who volunteer to attend or wish to air a grievance. Yet students are at the center of the teaching and learning process. Arguably, therefore, students and the student experience should play a prominent role in quality assurance processes designed to improve teaching and learning.

Students can potentially be involved in accreditation in many different roles. Probably the most obvious is as informants during an accreditation visit, interviewed by the visiting team about such topics as the learning experience in various modalities (classes, out-of-class academic work, internships, and the advising experience). Particular attention here might be paid to discerning differences among the "experienced curricula" for different types of students to investigate disciplinary differences and equity. If an audit methodology were adopted, moreover, a selected group of fifteen or twenty randomly selected students might serve as the subject of the audit. These students could first be interviewed, and samples of their academic work assembled and scored to look at knowledge and proficiency in various domains, preferably aligned with or mapped to common outcomes frameworks like the DQP or AAC&U's LEAP outcomes. Students can also potentially play a role as review team members. While they could play a part in all interviews and other aspects of a visit, students might be particularly effective as academic auditors visiting classes, examining syllabi, and talking to students at the institution under review about key aspects of the academic experience. Finally, students can usefully be employed in the design of accreditation reviews and the development of the institutional review process. A graduate student and an undergraduate, for example, were members of the committee that developed the institutional review process for the WASC Senior Commission under its 2013 Handbook of Accreditation.

Balance in Review. In the name of "equity," the current institutional accreditation process treats all institutions the same. This means that sound institutions with good track records that would undoubtedly be reaffirmed are subject to unnecessary scrutiny, while institutions that have substantial deficiencies apparent to both accreditors and the public are not given sufficient attention. The alternative is for accreditors to adopt what has been termed a "risk sensitive" approach to review (ACE, 2012). Under this approach, accreditors would determine the level of scrutiny applied in institutional reviews on the basis of the past track record of the institution to be reviewed with respect to quality issues. Factors that might be considered here include previous problem-free interactions with accreditors (and other quality assurance players like states and the USDOE), a history of financial stability, minimal levels of student complaints, and continuing high quality outcomes such as learning gains and graduate success. Such a determination could be powerfully enhanced by an institution's performance on the set of standard "dashboard" indicators of institutional condition and performance described earlier. Quality Assurance organizations in other jurisdictions have adopted such an approach. For example, the QAA in the UK is considering such an approach using past performance data to assign institutions to three levels of "confidence" which experience different levels of scrutiny. This was preceded by an approach in under which the QAA applied a "light touch" to elite institutions whose academic quality was already signaled through multiple external markers. The Australian Tertiary Education Quality and Standards Agency (TEQSA) has also adopted such an approach, although it is not yet operating.

There is much to recommend moving forward in this way. It could certainly render the accreditation process more efficient because "low risk" institutions would not have to engage in

unnecessary compliance exercises which consume staff time and distract attention from the kinds of self-improvement activities from which they really can benefit. But care must be taken to ensure that high-end institutions do not exploit a "light touch" approach such as this to avoid important issues that **nobody** does very well, like the assessment of student learning.

For many observers, however, the drawbacks of such an approach outweigh its advantages. Because it treats institutions differently, it immediately turns the accreditation process into a rewards and punishment exercise, where institutions may try to game the process and complain or appeal to change their status. It also assumes that future performance is guaranteed by past achievement and, if it fails, the accreditor who granted the "light touch" status will be blamed. If accreditation is deemed to be about providing information to the public, moreover, the resulting information will be uneven because some things and some institutions will not have been examined. Finally, a "risk-based" approach may not be allowed under current regulation. As the ACE Task Force report points out, the USDOE has detailed "Guidelines for Reviewing/Preparing Petitions and Compliance Reports" which may not allow differentiated review and, while supporting the idea of moving forward with such an approach, the Task Force recommends that legislative clarification be sought on the ability of accreditors to pursue such a course of action (ACE, 2012, p.24).

• Public Reporting. Until recently, accreditors did not provide much information on the results of institutional reviews other than whether or not the institution under review maintained its accredited status (CHEA, 2005). But much of this has changed in recent years because many institutional accreditors are making the results of reviews more publicly accessible. Yet transparency remains a challenge for a variety of reasons. One is the general public perception that accreditation is a somewhat shadowy and secretive activity that only academic insiders can participate in or understand. A second more legitimate concern is that confidentiality is important to the accreditation process because it encourages institutions to honestly report their shortcomings. Were all of the results of a review—including negative findings—disclosed to the public, institutions might be inclined to conceal their weaknesses.

A number of mechanisms can be used to further extend public reporting. The first is for the accreditor itself to develop a short public report that provides information about the results of each review in terms of its findings. This can be organized in terms of specific findings associated with each accreditation standard or, more preferably, in the form of a list of institutional strengths and areas of concern. Several regional accreditors have already done this. The second approach is to require institutions themselves to post accreditation results on their websites. In addition, most regional accreditors are requiring institutions to disclose other information relevant to the accreditation process such as financial information, cost of attendance, retention/graduation statistics, graduate or job placement information, and learning outcomes statements, together with associated performance on student learning assessments. These developments reinforce the conclusion that this tenth and last challenge is already being attended to and that accreditors will voluntarily adopt new approaches when the need to do so is clear.

#### An Implementation Agenda

The reforms advanced in the previous section are significant, but they are not unattainable. More important, they leave the substance of regional accreditation's quality assurance function in U.S. higher education unaltered: accredited status awarded by a recognized accreditor would remain necessary for institutions to access federal financial aid funds and the current array of accreditors would remain largely unaltered. But making these things happen will require a long-term agenda with mutually supporting actions needed from both government and accreditors. This final section outlines this range of actions, with particular emphasis on changes to be made by Congressional action in Reauthorization and voluntarily by accrediting organizations and institutions.

- Reauthorization. Many of the reforms recommended can be made through changes in the Higher Education Opportunity Act when it is next reauthorized. Among the most prominent are:
  - Change the language of Part H, Section 496 (a) (5) (A) to directly refer to, and require accreditors to attend to "student learning gain" as well as "student academic achievement."
  - Establish a formal mechanism for start-up institutions to provisionally be recognized for a limited period of time that would allow them to access federal financial aid. During this period they would strive to establish a track record of successfully graduating students and placing graduates that would enable them to become fully accredited.
  - Create a new entity to coordinate and oversee institutional accreditation as a "public-private" corporation of similar structure and support to the Securities and Exchange Commission or the Federal Reserve. This entity would be publicly supported but would have an independent charter to ensure appropriate distance and objectivity. It would recognize institutional accreditors in place of NACIQI according to established criteria that would be crafted to induce accreditors to adopt the reformed structures and practices recommended in this paper.
  - Modify the scope of current recognition to allow voluntary changes in geographic boundaries among the regional accreditors. Alternatively, drop the term "regional" in statute and make all accreditors national and allow institutions to choose among them.
  - Require accreditors to adopt consistent terminology in describing review standards, accreditation actions, review processes, and student learning outcomes as a condition of recognition.
  - Cut significantly the number of items that accreditors are currently required to "inspect" as a part of accreditation reviews and move this responsibility to the federal

government and/or require it of states as part of their processes of licensing institutions to operate.

- Include language that allows accreditors to adopt "risk-based" approaches to accreditation in which institutions with a clear track record of success to undergo less frequent reviews conducted with a "lighter touch" than those applied to institutions that are at greater risk of an unsuccessful accreditation outcome.
- <u>Accreditors</u>. With or without the kinds of changes enacted through Reauthorization, accreditors
  themselves could take a number of actions consistent with significant reform as outlined in this
  paper. These actions include:
  - Clarify the fundamental purpose of accreditation and focus the accreditation process more visibly on teaching and learning by concentrating the institutional review process on how students experience the curriculum and demonstrated evidence of student learning outcomes.
  - Adopt common or consistent language to describe review standards, accreditation actions, review processes, and student learning outcomes.
  - Adopt a common set of "dashboard" measures addressing such topics as retention/graduation (for all students) and standard financial ratios, then use these measures visibly in the accreditation process including establishing threshold levels of performance.
  - Establish multiple levels of recognition for institutions and/or rate institutions on several dimensions of performance as the outcome of a review, replacing the current "all or nothing" decision with respect to accredited status.
  - Redesign on-site review processes to include audit methodologies and create tools that teams can use during visits such as mini-surveys, directed interview or focus group protocols, and ethnographic methods.
  - Work with adjoining regions to redistribute states or institutions amongst the existing array of accreditors to achieve a more equitable distribution of institutions across accreditors. As a special case, negotiate a merger between the WASC Senior College and University Commission on Colleges and the WASC Accrediting Commission on Community and Junior Colleges.
  - Include students on review teams and commissions.

- Adopt "risk-based" approaches to accreditation in which institutions with a clear track record of success undergo less frequent reviews conducted with a "lighter touch" than those applied to institutions that are at greater risk of an unsuccessful accreditation outcome.
- Continue to expand ways to make the institutional review process and the accreditation decisions that result from them more visible and understandable to the public.
- <u>Institutions and Associations</u>. Finally there are a few actions consistent with this reform agenda that can be taken by institutions themselves unilaterally or, more preferably, by institutions collectively through existing associations (AASCU, APLU, CIC, AACC, etc.). They include:
  - Establish consortia of institutions to experiment with alternative institutional review processes or techniques in collaboration with a regional accreditor.
  - Adopt a proactive stance with accreditors on assessing student learning that avoids a minimalist or compliance mentality.

These actions do not have to occur in a particular order or be necessarily performed by the assigned actor. Moreover, the reforms that they describe will most realistically happen over a long time period, perhaps as long as ten years. But if only a few of these proposals are enacted, institutional accreditation for the U.S. in the year 2025 will be both more efficient and more effective in assuring quality in higher education than is currently the case.

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