

Eleven Reform Proposals for Accreditation

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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. The paper reviews eleven specific changes in accreditation structure or practice aimed at narrowing the focus and improving the 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. These specific changes are outlined in an Appendix

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. 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. This purpose became much more prominent and important when the federal government established accreditation's "gatekeeping" function. The second purpose 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 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. 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. In the last ten years some of this has changed. Several regionals now have integrated standards that are not topically organized and are much more focused on performance. 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 a 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. As such, it should be the central object of scrutiny by accreditors.

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. Another characteristic would be a much clearer focus on audits and similar evaluation techniques that “drill down” into the actual academic experiences of typical students. A third possible ingredient would be for federal recognition of accreditation to draw more attention to how accreditors require evidence of student learning. At present, broad guidance is provided by the HEOA’s Part H, Section 496 (a) (5) (A), which 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.

2. Governance. Institutional accreditation currently operates within a governance environment that is at best loosely-coordinated. This makes it extremely difficult for those involved in quality assurance to speak with one voice in matters of policy. 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. Creating such an authoritative free-standing nonprofit body to coordinate and oversee regional accreditation was 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). 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.
3. 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. 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 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.

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. 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. 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. 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. 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 so that institutions have a choice of accreditors.

4. 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.” 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. 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.

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. The most basic remedy for this condition is for accreditors to establish a common vocabulary for describing some of the most basic aspects of the 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 the Council on Regional Accrediting Commissions (C-RAC). 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. Accordingly, 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.

5. 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. 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. Multi-level institutional rating schemes are not uncommon in quality assurance systems elsewhere in the world. 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.
6. 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 always defined consistently across accreditors.

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. 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. 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, accreditors should set appropriate benchmarks or thresholds on such measures as graduation rates.

7. 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. 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 direct cost.

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. At the same time, 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. Most visiting team members only attend a day-long (or even half a day) orientation session before being deployed for review.

Dropping peer review 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 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.

8. Conduct of Review. The current way in which accreditation reviews are undertaken has been in place more than sixty years. One pillar of this approach 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 is remarkably standard and circumscribed, with most of it devoted to group interviews. Team discussions leading to an accreditation decision, moreover, usually occur hurriedly over meals or late into the night. But there are many additional 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.
- *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.
- *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). These are 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.
- *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. Most accrediting teams spend most of their time listening to people rather than looking at things. It may pay dividends to have one member of a team devoted to purposive “walking around” instead.

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.

9. 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 roles 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. Students can potentially be involved in accreditation in many roles. Probably the most obvious is as informants during an accreditation visit. 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. Students can also potentially play a role as review team members. Finally, students can usefully be employed in the design of accreditation reviews and the development of the institutional review process.

10. 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 an approach could 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.

11. 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. 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. The second approach is to require institutions themselves to post accreditation results on their websites. These developments reinforce the conclusion that this final challenge is already being attended to and that accreditors will voluntarily adopt new approaches when the need to do so is clear.

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.

Appendix: An Implementation Agenda

This Appendix outlines a range of actions that can be taken to further the eleven reforms outlined in this paper, with particular emphasis on changes to be made by Congressional action through Reauthorization and voluntarily by accrediting organizations themselves.

- 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.”
 - 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.
 - 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.
 - 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.
- Accreditors. With or without changes enacted through Reauthorization, accreditors themselves could take a number of actions consistent with significant reform. These include:
 - Clarify the fundamental purpose of accreditation and focus the accreditation process more visibly on teaching and learning.

- Adopt common or consistent language to describe review standards, 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.
- 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.

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.

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