

## **Comments on *Higher Education Accreditation: Concepts and Proposals***

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I am Peter T. Ewell, Vice President of the National Center for Higher Education Management Systems (NCHEMS) and I would like to offer comments on Senator Lamar Alexander's position paper entitled *Higher Education Accreditation: Concepts and Proposals* prepared for the Senate Committee on Health, Education, Labor, and Pensions. By way of background, I have worked with regional accreditation for more than thirty years and have consulted with all seven regional commissions on topics related to standards development and the design of effective institutional review processes. I have written numerous policy papers and monographs on accreditation dating back to the 1992 Reauthorization of the Higher Education Act (HEA) and served as a member of the American Council on Education's Task Force on Accreditation in 2011-12. I most recently completed a white paper on accreditation reform entitled *Transforming Institutional Accreditation in U.S. Higher Education* that is centered on eleven specific reforms.

Senator Alexander's paper correctly identifies the many forces that are compelling policy-makers and higher education leaders to consider significant changes in the way institutional accreditation currently operates. These include general factors such as underperformance among higher education institutions themselves with respect to how much students learn and the rates at which they graduate, inadequate workforce skills, and the eroding competitiveness of the U.S. internationally with respect to the proportion of young adults holding a postsecondary credential. These also include more specific failings of accreditors in the U.S. to hold all institutions to high standards of performance through a transparent and efficient institutional review process. Finally, the paper correctly points out significant flaws in the governance of accreditation through the Department of Education's National Advisory Committee on Institutional Quality and Integrity (NACIQI).

With a few relatively minor exceptions, I agree with the Senator's diagnosis, together with many of the proposed "options for reforming accreditation" presented on pages ten and following. I particularly agree with the position taken (at the top of page ten) that reforming existing accreditation processes, rather than adopting an aggressive federal position in postsecondary quality assurance is the most prudent and effective way forward. As my recent white paper argues, I fundamentally agree with the three main areas of reform Senator Alexander establishes—refocusing accreditation on quality, redesigning accreditation to promote competition and innovation, and keeping recognition of accrediting agencies independent and free from politics. I have significant disagreements with some of the specific options presented, however. The sections that follow address each of the proposals made in the paper in the order in which they are presented.

- ***Repeal Accreditation-Related Regulations and Statutes that are Unrelated to Direct Institutional Quality and Improvement.*** I strongly endorse this proposal. Over the years, recognized accreditors—by virtue of being recognized—have been "deputized" by the Department of Education to discharge an ever-growing list of "inspection" functions for which, as the Senator cogently argues, they are not well suited. What they **are** equipped to do, and

what they were explicitly designed to do when they were created more than a century ago, is to examine academic quality—particularly undergraduate academic quality. In fact, I would go even farther in focusing on this task by reframing the effectiveness language currently contained in the Higher Education Opportunity Act (HEOA). Currently, broad guidance for federal recognition of accreditors is provided by the HEOA's Part H, Section 496 (a) (5) (A), which directs accreditors to establish standards of "student academic achievement." But paragraph (A) does not mention student learning at all, only such indirect indicators as state licensing examination results, course completion rates, and job placement. It probably should.

- ***Permit Flexibility and Nuance in Accreditation Review.*** I support the spirit of this proposal but have reservations about some of the details. The argument for a "risk adjusted" approach that would vary the level of scrutiny applied to institutions in proportion to their track record of past performance is one that was also offered by the ACE Task Force and I supported it then, so long as the level of scrutiny is of equivalent rigor and is centered on the quality of student learning. But for some observers, the drawbacks of a "risk adjusted" approach outweigh its advantages. Because it treats institutions differently, it can immediately turn the accreditation process into a rewards and punishment competition, 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 about some institutions will not be examined and reported at all.

Finally, "flexibility and nuance" should not be allowed to degenerate into inconsistency of language across accreditors. 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. 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 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. To address this difficulty, accreditors should establish a common vocabulary for describing some of the most basic aspects of the institutional accreditation process.

- ***Encourage Gradation, Distinction and Clarity on Accreditation Status and Reviews.*** I agree with the direction of this proposal for all of the reasons the Senator advances and I have done so publicly since this proposal was first mooted in the wake of the 1992 Reauthorization. An important caution in pursuing this path, however, is the assumption that high performing

institutions will actually want to go to the trouble of seeking a higher level of recognition. A salutary lesson here comes from specialized/programmatic accreditation, where many institutions with established national reputations simply do not bother to seek accreditation unless this additional recognition gives their graduates a competitive edge in the employment market. So if this proposal is pursued, careful thought will need to be given to how an increased level of recognition will concretely pay off for an institution.

- ***Delink Accreditation from Institutional Eligibility for Federal Student Aid.*** I strongly disagree with this proposal. Moreover, I find the several proposed advantages described by the Senator to be, for the most part, not relevant to the delinking proposal at all. My primary objection to delinking is that nothing is offered to take accreditation's place in determining institutional eligibility to receive federal funds—a function that surely must be discharged somehow by somebody. Several alternatives have been put forward, though not by Senator Alexander. One is to use a statistical dashboard of key performance indicators like that recently proposed by the White House to determine institutional eligibility. But, as the Obama administration is discovering, this is harder than it looks because the limits of available performance measures are substantial. For example, there are no widely accepted graduation rate measures that embrace incoming part-time and transfer students. Another alternative is for the Department of Education itself to institute a program of eligibility reviews using its own staff. Under current fiscal conditions, though, it appears highly unlikely that the Department could garner the funding to support the staffing levels needed to undertake such reviews and a whole new staff would have to be recruited and trained. Many other countries conduct quality assurance reviews through a government agency and their experience has shown that such operations are not cheap. In sum, absent a proposed alternative mechanism to discharge the recognition function, delinking is not a responsible proposal.

At the same time, most of the reasons offered in support of the proposal are not really relevant to delinking. The first is the familiar critique, offered at the bottom of page thirteen, that accreditation is rarely denied. Delinking would not change this condition: the way to do so is to make accreditation tougher. In parallel, decrying the small proportion of institutions that are denied re-accreditation misses the fact that very high proportions of institutions are denied eligibility for accreditation in the first place. As the ACE Task Force reported, only about half of initial eligibility petitions are accepted so the standards are tough at the outset. The second reason, offered in the first full paragraph of page fourteen, is that accreditation is not centered on learning. As argued earlier, I fully agree. But the fix is not to delink accreditation and access to federal funds, but to center the accreditation process more visibly on learning. Finally, the next paragraph asserts that accreditation's gatekeeping role gives them a license to meddle in areas that they should not be paying attention to. As noted under my responses to the first two proposals above, the answer here is to make sure that accreditors do, in fact, pay attention to topics that matter. In short, none of the reasons offered in support of delinking are related to gatekeeping. All are real problems but all can be addressed by changes already proposed elsewhere the Senator's paper.

- ***Establish New Pathways to Accreditation and/or Title IV Eligibility for Non-College Providers of Higher Education.*** I agree with the sentiment behind this proposal, but I believe it can be more effectively addressed in other ways. The essence of the proposal is to create alternative ways for institutions and other providers to gain access to federal funds by setting up new mechanisms to examine quality beyond recognized accreditors. In contrast, I believe that a reformed set of regional accreditors can perform this function quite well without the need to create new bodies, although I am not in principle against this course of action. The key is to allow recognized accreditors to compete with one another so that institutions are free to choose among them. This notion is compatible with restructuring the geographic basis of regional accreditation agencies, as called for in the Senator’s next proposal.

That said, all three of the “models” outlined in the middle of page fifteen are feasible, although I prefer the first. In my recent white paper on accreditation reform, I argue that non-traditional providers of postsecondary content like StraighterLine and MOOCs should be a mandatory object of scrutiny by regional accreditors when they conduct reviews of degree-granting institutions that use these providers. Such institutions have essentially “outsourced” portions of their curriculum and the quality of the entity to which they have done so should be a legitimate source of concern for any accreditor. Such third-party providers 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 these providers was taken, the role of the faculty in this decision, and how the institution satisfies itself that it is receiving a quality product.

- ***Eliminate the Geographic-Based Structure of Regional Accrediting Agencies.*** I understand the reasons behind this proposal, but I do not support it. Admittedly, the current regional basis for accreditation in the U.S. evolved by happenstance and, 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 (p.18).” The principal proposed alternative to this geographic organization is the one suggested by the Senator’s paper: a classification by institutional type. On the face of it, this 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 special-purpose 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. 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. Consistent with the discussion above, the way forward is to accelerate the developing “marketplace” for accreditation so that institutions have a choice of regional 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.

- ***Ensure the NACIQI’s Independence.*** I fully agree with this position. In fact, I think it could be strengthened by abolishing NACIQI entirely and replacing it with an independent commission responsible for overseeing and regulating regional accreditation on a national basis. 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 non-for-profit corporation separately chartered with indirect support from government through the Higher Education Funding Councils. Creating such an authoritative free-standing 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. But whatever alternatives are proposed, the need for strong independent coordination of accreditation—with adequate funding and staffing—remains a central issue for accreditation in the U.S. So I believe that the principal direction the Senator’s proposal is both appropriate and timely.

In sum, I support the general direction of the proposals made by Senator Alexander although I disagree with some of their details. The only significant disagreement is with the proposal to delink accreditation from access to federal funds. Further details on my ideas about how to reform accreditation can be found in my recent white paper *Transforming Institutional Accreditation in U.S. Higher Education* and I would be happy to discuss any of these ideas with staff or members of the Committee at any time.