

# Humphreys College

## NEWSLETTER SUPPLEMENT

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### TRENDS AND CHALLENGES IN HIGHER EDUCATION ACCREDITATION (PART I)

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*The following text is the first part of Dr. Richard C. Giardina's presentation as delivered at Humphreys College in November 2011. It starts with a brief overview of the avowed purposes of accreditation, especially of regional or institutional accreditation, followed by his review of the history of the relationship between private accreditation and federal government oversight. It discusses the tensions in the regional accreditation-federal oversight relationship. - The future trends in accreditation will be covered in the second part.* ~Editor

#### Why Accreditation?



Let's begin with a brief overview of the avowed roles or purposes of accreditation: First, to assure academic quality and fiscal stability; second, to permit students and institutions to access state and federal funds; third, to ease transfer of courses and programs among colleges and universities; and fourth, to engender confidence in higher education on the part of the public [Eaton (d), pp. 80-81].

What makes the American accreditation process unique in the world is that it is a non-governmental, self-regulatory, peer review system using essentially non-paid volunteer evaluators. It relies on the integrity and candor of a highly diverse set of institutions to assess themselves against a set of standards, viewed in the light of their own individualized missions; to identify their strengths and challenges vis-à-vis those standards and those missions; and to use the process itself for institutional improvement [Brittingham (b), p. 10].

#### Guidelines and Standards are Evolving

Accreditation guidelines and standards themselves have not remained static. Just in the past ten years, we have witnessed a major shift in their focus. If we use the Western Association of Schools and Colleges (WASC) as an example, its standards have gone from prescriptive, input-oriented, one-size-fits-all, checklist-type standards to ones focused on and grounded in what an institution stands for, where it wants to go, how it plans to get there, and how it will know it has arrived; in other words, standards that are centered around an institution's own definition of mission. They've moved from demanding compliance at a minimal level to encouraging institutions to strive to meet their highest aspirations. And, by demanding increasingly sophisticated and transparent evidence of levels of student learning, as well as similar evidence of student retention and graduation, they've coupled expectations for continuous improvement with expectations of institutional accountability in meeting student, societal, and governmental needs. In addition to all this, and in fact because of all this, institutional accreditation has continued to serve as a buffer between higher education institutions and governmental agencies, allowing access to federal funds while significantly preserving institutional autonomy. [See Brittingham (b), p. 26.]

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## The Development of the Accreditation-Federal Relationship

The history of the relationship between private accreditation and federal government oversight is a complex one. Let me focus on five key dates.

- In 1952, *the Veterans Readjustment Assistance Act*, for the first time, tied financial aid to accreditation. It “authorized the states to approve courses in an institution that had been ‘accredited and approved by a nationally recognized accrediting agency or association’” [Finkin, p. 2], relying on these same accrediting agencies to “identify institutions educationally worthy of taxpayer investment in the form of federal financial aid to students” [Brittingham (b), p. 21]. Thus began the federal system of “recognizing accreditors as reliable authorities concerning the quality of education offered by the institutions of higher education they accredit” [Brittingham (a), p. 33].
- Jumping ahead thirty-two years brings us to 1984, when the Department of Education began demanding that accrediting agencies judge institutions by their effectiveness in educating students.
- Eight years later, *the Higher Education Reauthorization Act of 1992* specified curriculum, faculty, and student achievement as areas that accrediting agencies needed to include in their standards. The Act brought accrediting agencies further into the federal government’s regulatory and accountability web.
- Fourteen years later, in 2006, *the Commission on the Future of Higher Education* established by then Secretary of Education Margaret Spellings published its controversial Report. Its overall focus was on the quality of higher education in America; the Report saw accrediting agencies as entities which could either promote or prevent change. It chastised them for inhibiting educational innovation and for keeping accrediting reviews private; it dismissed the reviews themselves for focusing more on process than on results of the learning endeavor. The Report found that accreditors provided no solid evidence, comparable across institutions and easily accessible to the public, of how much students learn in colleges or whether they learn more at one college than another [Brittingham (b), p. 23, and Brittingham (a), p. 32]. It found accreditation “incapable of setting and implementing high performance goals for institutional productivity” or of helping institutions to meet critical national needs [Crow, pp. 87-88]. It called for a transformation of accreditation to keep pace with the changing structure and globalization of higher education [Dickeson, p. 4]. Perhaps most importantly, even though few of the Commission’s recommendations were ever enacted, the Report and all of the conversation surrounding it signaled “a decisive and probably long-term shift of responsibility for quality assurance toward the federal government.”
- This shift can be seen in *the Higher Education Reauthorization Act of 2008*. First, the good news: Perhaps in contradistinction to the Spellings Report, the Act reaffirmed the integrity of the current regional accreditation process and the roles of individual institutions and the regional accrediting bodies in setting standards and in assessing student achievement [Brittingham (b), p. 24, and Bardo, p. 49]. On the other hand, the Act significantly increased institutional reporting requirements. “The law now places the federal government as arbiter in several key areas formerly viewed as within the exclusive province of accrediting organizations or institutions,” including distance education, transfer of credit, due process associated with accretor reviews and appeals, and transparency. The Act “requires that accreditors both expand the information about accreditation decisions that is provided to the public and routinely make this information available...” Perhaps more important is that the new requirements for data may provide an easy step to publishing comparability analyses and from there to “publishing rankings and to undertaking qualifications comparisons. Such actions readily lend themselves to standardization and centralization of control of higher education, in short, a nationally-based system in the making, a system to which, to date, the United States has refused to accede” [Eaton (b), p. 3].

## Tensions in the Accreditation-Federal Relationship

I trust that by now you are beginning to see the tensions in the regional accreditation-federal oversight relationship. Let me delve into these tensions a bit more, specifically as they revolve around issues of access, of assessment, and of accountability.

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Though other countries may have now surpassed us in making higher education accessible, American higher education is still one of the most accessible systems of higher education in the world today, though this may be changing; witness what's happening to state institutions in California. Nevertheless, our system of public and private higher education, and increasingly our focus on alternative delivery modes and distance learning, provides students with an unbelievable array of opportunities to continue their education after high school.

Our society has a vested interest in providing the best education for the greatest number of students; in getting them into, through, and out of undergraduate and graduate academic programs; and in ensuring that tuition dollars and tax-payer dollars are demonstrably well spent.

It is eminently logical that the federal government, which in 2009-10 spent approximately \$200 billion in student financial aid, wants the greatest bang for its buck. If students spend financial aid dollars and then don't graduate, the money is not well spent. If students graduate without having learned what they were supposed to, the money is not well spent. If students learn but no one knows what they've learned, the money is not well spent.

### **A Call for Data: Admission, Retention, Graduation**

Increasingly, federal and societal pressures are demanding more detailed data regarding student admission, retention, and graduation. There are calls for students to be able to transfer credit easily from one institution to another and for institutions and accrediting agencies to maintain standards for program length and for the awarding of academic credit. There are questions as to why associate-level degrees are "inflating" into baccalaureates, bachelor's degrees into master's degrees, and master's degrees into doctorates. There are demands for sophisticated assessment of student learning and reporting of results in ways which are easily understandable and which permit cross-program and cross-institution comparisons. And, for the moment and for the foreseeable future, there are expectations that accrediting agencies will do the work to provide all of this.

### **The Federal Regulatory Process at Work**

The result of the expectation is that tensions abound between the accrediting agencies and the federal government. In December 2009, the Department of Education's Inspector General's Office, in an expression of concern about how units of credit are awarded for accelerated programs, found that the Middle States Accrediting Commission on Higher Education "does not have minimum requirements specific to program length and does not have minimum requirements for the assignment of credit hours. The lack of requirements could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of federal funds." It noted the Middle States focus on student learning outcomes, but concluded that it did not find that "Middle States provided any guidance to institutions and peer reviewers on minimum outcome measures to ensure that courses and programs are sufficient in content and rigor" [Office of Inspector General (a), p. 2].

That same month, in another finding, the Inspector General's Office found that North Central States' Higher Learning Accrediting Commission either does not have specific standards related to program length and credit hours; or has specific standards but doesn't follow them or take effective action when faced with evidence of non-compliance; or has standards which are so low or lacking in specificity that they can be easily met [Office of Inspector General (b), p. 2].

Strong and scary words indeed and certainly evidence of the federal regulatory process at work in attempting to demand that accrediting agencies ensure compliance. This compliance bind leads inevitably to the question of the extent to which regional accreditation will be reflective of federal regulations versus reflecting "the professional opinions and stances of academic professionals" [Bardo, p. 49]. It also leads to the question of the extent to which accrediting agencies will encourage institutions to engage in relatively risk-free assessment of student learning for program and institutional improvement versus the potentially "risk-full" assessment of student learning for reporting, comparisons, accountability, and perhaps even qualifying for federal funding. "Adopting either one of these two perspectives will decisively influence institutional choices about what and how to assess, how to organize assessment, and how to communicate assessment results" [Peter Ewell, p. 5].

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### Accountability Indicators are Often Simplistic

What is unfortunate here is that accountability indicators are often simplistic and may be “inappropriate, unhelpful, or misleading” [Ewell, p. 20]. According to WASC’s Ralph Wolff [p. 23]: “To institutional accreditors, a single, or even several, predefined and universally applied metrics of effectiveness are impractical and inappropriate, given the range of institutional types and large number of degree programs offered by institutions.”

- Are certain retention rates acceptable and others unacceptable?
- How about graduation rates?
- Should similar academic programs all have the same program content and learning outcomes?
- Should all General Education programs have the same requirements?
- Should test scores on nationally standardized exams determine program and institution rankings?
- Is it not possible that accountability demands will attempt to enforce a consistency that will threaten both institutional diversity and institutional attempts to pursue their own individual definitions of achievement and excellence?
- Will it not be the case that forcing accrediting agencies to serve as federal surrogates in implementing a regulatory and accountability function will ultimately have dramatic consequences in restructuring the relationship these agencies have with the higher education institutions which initially created them?

Wolff does not see accrediting agencies setting regionally standardized and pre-determined educational effectiveness standards but rather working with institutions themselves to “set high standards, evaluate performance against those standards, and strengthen the peer-review process to improve institutional results” [Smith and Finney, p. 24]. Anne Neal of the American Council of Trustees and Alumni disagrees. She believes that “the accreditation system neither protects the public nor ensures high-quality higher education.” She sees self-regulation at its worst as a “buddy network, a barrier to entry, a closed and collegial system more concerned with sustaining itself than with enhancing the quality of higher education” [Neal, pp. 28-29].

*Note: The second part of Dr. Giardina’s presentation will be published in the next issue of the Newsletter. It will deal with the following issues: What are accrediting agencies to do? How will they “retain the confidence of the public to oversee educational quality in a nongovernmental peer review system” [Brittingham (b), p. 19]? How will they stave off federal imposition of “some ‘one size fits all’ standard for quality? How can accreditation and the federal government “eventually achieve the appropriate balance between institutional diversity on the one hand and meaningful standards of quality performance on the other...” [Dickeson, p. 9]? What must private, peer-based accreditation do to continue to maintain its pivotal role in ensuring educational quality?*

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