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**A NATIONAL DIALOGUE:
The Secretary of Education's Commission
on the Future of Higher Education**

ISSUE PAPER

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to inform the work of the Commission*

The Need for Accreditation Reform

Robert C. Dickeson

Summary: Accreditation of higher education in the United States is a crazy-quilt of activities, processes and structures that is fragmented, arcane, more historical than logical, and has outlived its usefulness. Most important, it is not meeting the expectations required for the future. This paper distinguishes between the institutional purposes and the public purposes of accreditation, and suggests one significant alternative to the status quo.

What Does Accreditation Mean?

“Accreditation” can mean one or more of the following:

- A college or university receives *general* accreditation from one of six regional accrediting organizations, depending upon its geographic location. These bodies are voluntary organizations that are run by higher education institutions themselves, and accredit entire institutions. The standards for accreditation, which vary by region, are based on an institution's self-study of the extent to which the institution feels it has met its own purposes. Regional accrediting bodies are funded by dues and fees paid by member institutions.
- Special purpose institutions, including proprietary career colleges, receive accreditation from one of 11 national accrediting organizations. These bodies are run by the institutions that are the objects of the accreditation, and are funded by dues and fees paid by member institutions.
- An academic program within an institution may seek *specialized* accreditation from one or more of the 66 specialized and professional accrediting organizations established for these purposes. Specialized accreditation is usually voluntary; an institution may choose to seek accreditation in an academic field (business, nursing, e.g.), but is not required to do so. In fields such as law and in numerous health professions, licensure is dependent on graduation from an accredited program. Standards for specialized accreditation are set by the profession or academic discipline, and generally are focused on inputs (proportion of faculty with terminal degrees, student-faculty ratios, etc.) rather than outcomes. Some academic programs have more than one specialized accrediting body, and the institution chooses which body – and its attendant standards – it wishes to use. Specialized accreditation is often seen as “guild-centric.”

- Accrediting organizations themselves are “recognized” by a national coordinating organization, the Council for Higher Education Accreditation (CHEA). CHEA itself is only a few years old, having succeeded to this role after the dissolution of its predecessor organization. CHEA, according to its charter, seeks to “strengthen” accreditation by coordinating the other accrediting organizations.
- The 50 states get involved with accreditation through licensure and certification requirements established to regulate certain careers or professions. College programs in teacher education, for example, are accredited by individual states in order for graduates of those programs to receive state certification to teach. Programs and standards vary among the 50 states.
- The Federal Government also recognizes accrediting organizations. Federal recognition aims to assure that the standards of accrediting organizations meet expectations for institutional and program participation in federal initiatives, such as student aid. This recognition is a powerful lever. Without accreditation institutions would not be authorized to disburse federal financial aid.

What Are the Purposes of Accreditation?

Sorting through all of the competing and sometimes conflicting jurisdictions, processes and structures, there are two major purposes for accreditation in the United States: institutional purposes and public purposes.

Institutional Purposes

1. Colleges and universities use accreditation for self-improvement. By conducting a self-study and having it validated by an external group of peers, institutions can take a look at themselves and determine institutional progress over time.
2. Institutions assert that accreditation helps advance academic quality. “Quality” in this sense usually equates to inputs, such as the admission profile of students, the qualifications of faculty, the equipment allocated to a particular discipline, etc.
3. Accreditation is linked to planning. Often the results and recommendations of an accreditation visit find their way into institutional plans and budgets in subsequent years. Accreditors typically expect institutions to demonstrate that planning has taken place. College and university presidents identify accreditation as the key moving force behind strategic planning.
4. Institutions use accreditation as a medium of inter-institutional exchange. Academic credit from another institution, if it is to be accepted at all, is accepted only from an accredited institution. Only students with degrees from accredited institutions are admitted into graduate and professional schools at a university. And faculty and staff are hired only if their degrees were awarded by accredited institutions.

Public Purposes

1. The primary public purpose of accreditation is consumer protection. Because the public cannot investigate every aspect of postsecondary institutions, it relies on accreditation to sort through good from bad, the legitimate operation from the diploma mill, so that it can be assured that the credentialing powers of institutions are valid.

2. Accreditation should assure that the public interest is honored, particularly with respect to the public investment. Institutions not only receive funds from public sources, they benefit from tax-exempt status and from the ability to generate tax-deductible contributions. The public has a need to know that the return on its investment is sound, and that the preferred status enjoyed by institutions is justified.
3. The public has a right to know about quality. Are the credentials conferred by institutions of high quality? Is the institution a trusted source of knowledge? Does the research conducted by the institution meet standards of excellence? Does the institution operate with integrity? Are the products of the institution competitive globally? Good accreditation would answer these questions.
4. There are numerous stakeholders in higher education that must rely on solid accreditation: students and prospective students; families that provide support to students; donors and grantors; employers who hire graduates; and the general public. All stakeholders need consistent, clear and coherent communication about the results of the education provided and the value of institutional products.

Any serious analysis of accreditation as it is currently practiced results in the unmistakable conclusion that institutional purposes, rather than public purposes, predominate.

There are historic and practical reasons for this situation:

1. Accreditation in the United States was started by institutions. Beginning in 1885, the New England Association of Schools and Colleges was established by institutions seeking some means of assuring inter-institutional quality. The other five regional organizations followed suit and were created by the institutions in their respective jurisdictions by 1919.
2. Accreditation is maintained by institutions. Although the regional organizations employ professional staffs to coordinate accreditation activities (New England has a staff of seven to oversee accreditation at 253 degree-granting institutions, e.g.), the bulk of the work is undertaken by hundreds of volunteer faculty and staff from the very institutions being accredited.
3. Accreditation is paid for by institutions. Through a system of dues and fees, usually based on the size of the institution and the costs of candidacy and site visits, the accreditation organizations are funded by institutions.
4. Accreditation coordination, through CHEA, was the product of institutional presidents, who, recognizing that overall coordination was needed, created CHEA in 1996.
5. Institutional interests predominate over public interests in the overall direction of accreditation. As the table below indicates, most regional accrediting bodies have included some members of the public in their higher education governance structures.

All this is not to suggest that institutions are ignorant of or antagonistic toward the public purposes of accreditation. But a system that is created, maintained, paid for and governed by institutions is necessarily more likely to look out for institutional interests.

**PUBLIC MEMBERSHIP ON REGIONAL
ACCREDITATION BOARDS/COMMISSIONS**

<u>Organization</u>	<u>Members</u>	<u>Public Representatives</u>
New England	23	6 (26%)
Middle States	27	0
North Central	17	3 (8%)
Southern	77	11 (14%)
Northwest	24	4 (17%)
Western	20	3 (15%)

What Are Some of the Problems With Accreditation?

1. *America's reputation for quality higher education is in jeopardy of slipping.*
 - The Organisation for Economic Co-Operation and Development in Paris recently reported that, among its 30 member nations, the United States now ranks 7th in the percentage of the population that enters postsecondary education and then completes a bachelor's degree or postgraduate program. In large part, this statistic is due to higher education's dismal record at student attainment. Accreditation should identify and report on student success. By so doing, students and families can make enrollment decisions based on better information, institutions can be put on notice to improve student success rates, and policy makers can reward institutions that achieve high success goals.
 - The National Assessment of Adult Literacy, released in December, shows that the average literacy of college educated Americans declined significantly from 1992 to 2003, and revealed that just 25 percent of college graduates scored high enough on the tests to be deemed "proficient" from a literacy standpoint. What role should accreditation play in this shameful outcome? From what institutions did these adults graduate? If accreditation is to have any meaning, achieving standards of literacy – prose, document and quantitative – should be at the core of institutional approval by accrediting organizations.
 - Fully one-third of students enter postsecondary education needing academic remediation in reading, writing and/or mathematics. Accreditation should evaluate the efficacy of institutional admissions policies and practices: are institutions admitting students who have some reasonable expectation of success, or are they playing a numbers game for financial purposes? Has the inflow of under-prepared students resulted in a lowering of standards for graduation? Institutional assessment at the course level is undertaken through the assignment of grades, and yet grade inflation is reported as a national problem. What is accreditation doing to assure that quality is not suffering as a result?
 - A recent survey of 4-year college presidents revealed that 74.5 percent of presidents feel that "Colleges and universities should be held more accountable for their students' educational outcomes." Accreditation should transform this impression – shared by many in the public and by public policy makers – into reality.

2. *The public's need for critical information is not being met.*
 - Students and parents lack reliable information about college-going, including admission requirements, available programs, actual costs, the availability and extent of financial aid, and the range of accessible postsecondary options. Accreditation should insist on greater transparency by colleges and universities in the information they share publicly, and expect that the public has complete access to relevant data about college access, costs, attainment success and the extent to which standards were enforced.
 - Higher education institutions and their associations have ignored repeated requests for transparency by national commissions and higher education organizations (National Commission on the Cost of Higher Education (1997); Business-Higher Education Forum (2004); Association of Governing Boards Ten Public Policy Issues for Higher Education (2005), to cite a few). Accreditation should include transparency as a condition of continued approval.
 - Accrediting organizations do not all agree that the public either needs additional information or that sharing it is wise. Some accreditation leaders fear that more public disclosure will result in: an adversarial, rather than collegial, accreditation process; a smothering of trust critical to self-analysis; unwanted press coverage of school problems; and schools withholding information. Still other accreditation leaders deny the very existence of public demand for more information and point out that typical accreditation reports do not contain the kind of information that the public wants. Finally, some accreditation leaders understand that more information is necessary, and observe that other countries' institutions provide it without negative effect.
 - In the absence of accreditation providing information that the public wants, the void has been filled by *U.S. News & World Report*, whose annual analysis and rankings of institutions has become the most popular publication of that organization. Institutions that complain about the *U.S. News* approach to public accountability should insist that accreditation organizations fulfill this responsibility by asking the right questions – and publishing the answers.

3. *Traditional approaches to accreditation are not meeting today's needs.*
 - Technology has rendered the quaint jurisdictional approach to accreditation obsolete. Some standards actually vary by region. The rise of distance learning and electronic delivery of educational content across borders means that provider and student can be nations apart. Campuses and content today ignore geographic boundaries. More and more students are crossing state lines to complete their education and enrolling in multiple institutions, often simultaneously. Accreditation should refocus efforts on student achievement for the growing number who undertake alternative forms of education, and expand international quality assurance efforts.
 - Accreditation currently settles for meeting minimal standards. Nearly all institutions have it, very few lose it, and thus its meaning and legitimacy suffer. Institutions are not accepting credits from other accredited institutions, presumably because they do not believe that accreditation equals quality. Basing accreditation on truly rigorous standards and differentiating among levels of quality attainment would more accurately reflect the higher education landscape. If there were levels of accreditation, institutions would compete for honored spots (much as they do now for *U.S. News* rankings) and higher education's stakeholders could differentiate among institutions, depending upon stakeholder interests.

- Accreditation is conferred typically for a ten-year period. Historically this term made sense when faculty volunteers were required to write self-studies and to perform site visits. The explosion of knowledge, the power of information technology and the pace of institutional change, however, have made a decade too long a period for timeliness. Accreditation should concentrate on key qualitative and quantitative measures that can be collected, retrieved, analyzed and published on a continuous basis.
- Accreditation structure is archaic and contains too many layers and filters. For example, public concerns are expressed through elected officials, who communicate to CHEA, which communicates with accrediting organizations that communicate finally to institutions. The complaint process of the accrediting organizations is hardly user-friendly, and the stated policies about complaints make it clear that the accrediting organization will not interfere with institutional prerogatives. This process reflects the criticism that accreditation is the captive of the institution.
- Most of the costs of accreditation in the United States are borne by the institutions themselves. Costs include the dues and fees paid to regional, national and specialized organizations, the released-time granted to faculty and staff who volunteer to serve accrediting organizations, and the labor and technical costs of conducting institutional self-studies. As institutions are under pressure to cut costs, conducting quality accreditation should not be diminished or jeopardized.
- There is an over-reliance on volunteers in the important accreditation process. As institutions hire fewer and fewer full-time faculty, there are increasing pressures on such remaining faculty to fulfill on-campus duties and also meet external accreditation responsibilities.

How Can Accreditation be Reformed?

The reform of accreditation in the United States is necessary because accreditation has become too important to remain the exclusive prerogative of the very institutions being accredited. Accreditation has long been viewed by institutions as a key artifact of their autonomy. Yet the collision of forces beyond the institution demand more integrity in the process.

These forces include:

- The shift from measuring inputs to assessing and reporting outcomes, especially student achievement.
- The recognition that, with 70 percent of the nation's high school students moving into postsecondary education, accreditation is an increasingly national concern.
- The heavier reliance of the nation on higher education to improve quality of life, economic development, and global competitiveness through teaching, research and public service.
- The increasing investment in higher education, from public and private sources, with concomitant expectation of a positive return.
- The expanded importance of higher education, as seen through the eyes of its many stakeholders.

The alignment of accreditation and accountability, the alignment of institutional and public purposes, the alignment of importance and quality, and the alignment of investment and return

could possibly be strengthened by the creation of a new organization, operating with new standards and processes, for the nation's benefit.

An Alternative: The National Accreditation Foundation

A new organization could achieve the multiple needs for alignment. The Congress and the President could enact legislation creating The National Accreditation Foundation. If created, the National Accreditation Foundation would be a private-public operating partnership, enabled to:

- Create and maintain quality standards for the nation's postsecondary institutions that are at once rigorous and transparent.
- Superintend new accreditation processes for institutions and programs that are more efficient and effective.
- Communicate with the public the results of accreditation decisions so as to improve information and accountability.
- Succeed to the current accreditation responsibilities of federal agencies, including eligibility for financial aid and federal research support.
- Create and maintain a permanent endowment from private and public sources, income from which will assure a professional level of accreditation for the nation going forward.

The Foundation would be governed by a board composed of representatives of the public, institutions of postsecondary education, business and industry, and state and federal governments. The governing board would select a chief executive and such professional staff as would be necessary to implement its purposes and validate its legitimacy.

The Foundation would leverage its authority to seek improvement in measurement of educational outcomes, secure more uniform standards among the states in career and professional certification, advocate for a stronger, more innovative higher education system, and promote the public interest in the success of American postsecondary education.

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