

Should Accreditation be Conducted by the Federal Government?

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Abstract

The debate over whether the current mission-based, peer accreditation system in the U.S. is providing adequate accountability for student learning or whether it should be replaced with a federally managed accreditation system has grown more intense over the last decade. The purpose of this paper is to explain the author's position that accreditation by private agencies is vital to the strength and quality of higher education. Arguments are presented regarding the comparative benefits of the present system over a federal system—for institutions, the public, and students. Finally, a set of recommendations that would assist the higher education community to work together to better address legitimate accountability needs of the public and policymakers are discussed.

Introduction

Calls for accountability in American higher education have recently become more intense (Burke, 2005; Webber & Boehmer, 2008). The president of the Council for Higher Education Accreditation (CHEA) offers the following definition of accountability: “colleges and universities answering to students and society about what has been done to assure success with student learning and overall institutional performance” (Eaton, 2009, para. 2). As Wolff (2005) states, accreditation has been a primary means of accountability and quality assurance for more than a century (p. 78). However, the reliability of the current decentralized system of accreditation by peer review has been called into question by policymakers, the press, and the public in recent years, especially since the work of the Secretary of Education’s Commission on the Future of Higher Education in 2005-2006 brought the issue to the forefront of national discussion (Eaton, 2009, para. 3). An issue paper by Schray (2006), which was released by the commission, recommended a “major transformation in the accreditation process toward a more public-private system of governance based on national if not global standards” (p. 8). The commission’s report formed the basis for provisions of the 2008 reauthorization of the Higher Education Act and 2010 policies of the Department of Education that expanded federal oversight of traditionally academic matters such as transfer of credit and the definition of a “credit hour” (Eaton, 2013, para. 6-7). Thus, as calls for greater accountability have increased, the discussion has come to center on the question of whether higher education institutional accreditation should continue to be conducted by peer evaluation or whether it should become a standardized system managed by the U.S. Department of Education. A plan published with the 2013 State of the Union message called for Congress to revise the current accreditation system or develop a new system of accreditation, tying federal financial aid to performance measures (White House, 2013, p. 5), such as those included on the new College Scorecard – cost, graduation rate, loan default rate, and employment rate. As Congress drafts legislation for another reauthorization of the Higher Education Act in 2014, institutions of higher education must make more effort to

publically demonstrate and communicate that nongovernmental accreditation is not only preferable, but essential to the quality of American higher education, providing benefits to the institutions, the public, and, most importantly, the students.

Benefits to the Institutions

A common argument against the current peer review system of accreditation was voiced recently by the chair of the Senate Health, Education, Labor, and Pensions Committee. Eaton (2011) reports the senator was skeptical that accrediting bodies are able to “rigorously judge their institutions and programs when these operations also provide funding for accreditors.” The leader’s statement implies a concern that volunteers may not be qualified to make the required judgments of quality and that, because colleges pay for the process, agencies are willing to allow substandard performance to “pass,” rather than requiring change when colleges do not demonstrate certain levels of excellence. Therefore, one question to consider in the peer review versus government review debate is which process is more conducive to actual improvement in institutional quality.

When an institution undergoes the peer review process, it first benefits from the process of extensive self-analysis. Brittingham (2009) writes, “Accreditation relies on the candor of institutions to assess themselves against a set of standards, viewed in light of their mission, and identify their strengths and concerns, using the process itself for improvement” (p. 10). She asserts that the review standards, covering all areas of instructional, educational support and administrative operations, are “sufficiently aspirational” to allow every institution to discover areas in which it desires to improve, “promoting productive engagement in the accreditation process” (p. 16). Finally, she notes that advances in information technology have given colleges the capacity for engaging in deeper and wider reflection, conducting sophisticated data analysis and benchmarking, and producing meaningful reports of results (p. 15).

Secondly, the institution benefits from recommendations for improvement in pedagogy, processes, and policies by evaluating teams composed of individuals with expertise in the workings of various units of colleges of similar size and classification. An officer of the accrediting agency is assigned to be present on-site with every team, helping to advise them regarding how to interpret the agency’s principles of accreditation and how to appropriately evaluate the college’s operations and outcomes in light of those principles. Moreover, reviewers often repeat the experience, serving on a number of visiting committees and becoming more practiced in all the steps of the evaluation process.

When accreditation or reaffirmation is awarded to a college, it is, as Brittingham (2009) claims, “a statement by peers that the institution has demonstrated its ability to identify and address significant issues: that it is operating at a satisfactory (or better) level of quality and gives reasonable assurance that it will continue to do so for up to ten years, with specified monitoring” (p. 18). Thus, the process is of great benefit to the institution in more ways than merely assisting continuous improvement. It also assists an institution in recruitment processes by offering assurance to students, the public, and the government that taxpayer funded financial aid is being spent on a well-operated, quality educational experience there, both inside and outside the classroom.

An accreditation process conducted by the federal government, however, would almost certainly focus more on compliance with regulations and economy-based standards rather than on using data and assessment results for forward-looking improvement. Brittingham (2009) suggests, “A regulatory approach... is unlikely to engage the institution in formulating its own questions about what and how students are learning” (p. 19). The key word here is “engage.” As Wolff (2005) notes, “When accreditation is seen primarily as a compliance-driven exercise to demonstrate the achievement of minimum standards and no more, it becomes like a trip to the dentist: a necessary task but one that should take as little time and cause as little pain as possible” (p. 87). Clearly such a process would not stimulate improvement in individual institutions in the same way the peer review process does.

Private institutions would probably find an additional disadvantage to a federally conducted accreditation process related to the almost certain increase of disclosure of accreditation documents under this type of system. Wolff (2005) observes that private institutions, which are so dependent on enrollment-driven tuition revenues and on private gifts, are more vulnerable to critical findings of an external review (p. 100). Most people assume any problem mentioned by an accrediting agency means loss of accreditation is shortly to follow. Therefore, if too much information about weaknesses uncovered in a private college’s review is made public, without a very clear explanation of the meaning of those findings, the institution’s ability to recruit students and to solicit donor support could be severely undermined, even if it had indeed been reaccredited. As Wolff posits, the college could find itself unable to generate the resources needed to improve the weak areas (p. 100).

Benefits to the Public

Wolff (2005) writes, “Within the academic community, there is general agreement that the costs of self-regulation are substantially lower than if state or federal governments were to assume this function” (p. 87). Evidence to support this belief is provided by Brittingham (2009), who points out that in 2005 the seven regional agencies accredited three thousand institutions using thirty-five hundred volunteers and just over a hundred full-time staff (p. 18). She further notes that government-based quality assurance systems in other nations maintain an average of one employee for every two or three institutions accredited (p. 19). Thus, if a federal review system is put in place, tax dollars will have to be budgeted to operate it—allocations that will be difficult to make at a time when federal and state governments are looking for ways to reduce spending. However, with the current system of review, the public receives the assurance of a robust, collaborative accountability process for a very low financial investment.

Recent government actions based on Spellings Commission recommendations that accreditation should create a template for measuring student learning consistently across institutions, balanced with institutional achievement measures (Schray, 2006, p. 7), show that accreditation managed by the U.S. Department of Education will focus on elements that can be easily measured and compared among institutions, like student competencies; retention, graduation and job placement rates; faculty credentials; and financial indicators. Other components—such as the effectiveness of board governance, academic program development and approval processes, educational support services, and co-curricular programming—which are not so easily compared, would likely not receive the attention they deserve as part of the large picture of academic quality. Brittingham (2009) points out that the government does not currently require accrediting

agencies to include such qualitative items in their standards of accreditation in order to receive federal recognition (p. 17). Therefore, a governmental review process is unlikely to provide the kind of full-orbed accountability to the public that peer review offers.

Benefits to the Students

A move to a federally managed accreditation process could limit students' choice regarding their educational experience and even hinder the depth of post-secondary student learning. Bassett and Tapper (2009) note that the pluralistic nature of American higher education, in terms of mission and programs, promotes breadth of student mobility and achievement in preparation to live and work in a very diverse society (p. 131). Diversity of institution provides the possibility of a good fit for each student's educational and social needs. Two decades ago, the National Association of Independent Colleges and Universities (NAICU) published a report on accountability that the organization continues to publish as relevant today; it stated:

[The current accreditation process] has been designed to provide standards without standardization. Outcomes are evaluated within the context and mission and circumstances of each institution. Judgments about quality of diverse institutions require many indicators and measures, both quantitative and qualitative. The process relies on peer review because evaluations are based on informed judgments, not formulas. In this way, accreditation deals with the complexity of the enterprise (1994, p. 6).

Under a standardized federal accreditation system, if an institution must maintain a certain minimum retention or graduation rate to remain accredited, then, as Zumeta (2005) contends, "The surest route to success is to reduce the 'risk profile' of the students admitted" (p. 50). In other words, the easiest way for an institution to meet such accreditation criteria would be to admit fewer less-advantaged students, thus reducing those students' range of choice and opportunity within higher education. Zumeta offers that some private colleges would be able to raise their selectivity for admissions while others would not, "further stratifying student bodies socioeconomically across these different types of schools" (p. 50). Since as Fallows (2005) points out, retention rates for Hispanic American and black students are far below those of white students (p. 45), the widening stratification would probably end up being along ethnic as well as socioeconomic lines. However, educational research indicates it is important for students to be exposed to a diversity of experiences, ideas, and expression in order to develop respect for those with viewpoints different from their own (Torres, 2010, pp. 62-63). Consequently, the decrease in student diversity on some college campuses would be detrimental to student learning. Zumeta (2005) expresses the concern that it would be difficult for federal mandates to be designed to "take account of student educational characteristics at entry in setting persistence and graduation standards to mitigate these powerful 'creaming' [i.e. separating] pressures" (p. 50).

Furthermore, Zemsky (2009) notes that if accreditation is to be centralized under federal control, national standards of institutional effectiveness, including "common definitions of the educational outcomes that accredited institutions are expected to supply" and testing regimes to assess those outcomes would have to be developed and accepted (p. 187). The author asserts, "Tackling these issues would be a Herculean task promising at best uncertain results" (2009, p. 187). As Smith and Barclay (2010) point out, the simplicity of using standardized tests and shared terminology to describe student learning "may be laudable goals for comparing

institutions for purposes of accountability, but these goals rarely have the important effect of going beyond assessing learning to enhancing learning” (p. 96). Zemsky (2009) reasons that if student scores on federally mandated tests were to influence accreditation status or the funding for which it was eligible, “all but the most selective and richly endowed institutions would make it their business to teach to the test” (p. 119). Surely this type of instruction would greatly impede engaged teaching, hindering higher cognitive development in student learning. Zemsky further asserts that results from a standardized testing regime would correlate most highly to student *inputs*, such as test taking ability and SAT and ACT scores (p. 119) and would, therefore, not really provide accountability for *outputs*—effective teaching and student learning.

Conclusion

Calls by the public and policymakers for greater accountability in higher education have been increasing over the past decade. Since high college costs are paid by taxpayers, either directly—through tuition or donations—or indirectly, through federal or state allocations, it is reasonable for them to demand more information about the return on their investment, that is, student learning outcomes. While it may be true that higher education institutions can do more to provide clear information to the public about the results of assessments of their students’ learning, the current accreditation system based on peer review and mission context provides many benefits to the institutions, the public, and students. Institutions are assisted in achieving their goal of continuous quality improvement through rigorous self-study and recommendations by qualified peer evaluators. The public benefits from a cost effective system of review that evaluates the quality of student learning as well as numerous other elements of institutional performance that are not easily measured in a standardized way. Finally, a varied student population benefits from an accreditation system that supports a rich diversity of institutions to meet their different educational and social needs.

A federally managed system of accreditation would, as NAICU (1994) states, “threaten the strength and vitality of American higher education” (p. 1). It would discourage institutional engagement in forward-looking improvement, focusing instead on compliance with regulations. Disclosure of results without clear explanation could harm the reputation of colleges beyond their abilities to recover, even if revealed weaknesses were not critical. A federal system would be more costly to taxpayers than the current system and would not necessarily provide better assurance of student learning or of institutional quality. Lastly, such a review system could jeopardize students’ access to a diverse array of educational opportunities and to pedagogy that fosters higher level cognitive development.

Recommendations

NAICU and the president of CHEA offer some recommendations regarding ways that higher education can work with state and federal governments to provide a system of accountability that maintains the autonomy, diversity and creativity of institutions while meeting the public’s legitimate need for information. NAICU continues to urge institutions to find ways to provide students and policymakers with the different kinds of information required for their different purposes. Students and their parents need meaningful and comparable data so they can make informed decisions, such as “why institutions with different missions and circumstances can be expected to have different graduation rates,” while policymakers need aggregate data on the

status and progress of higher education (1994, p. 9). The association also urges the presidents of its member institutions to become actively engaged in public policy debates on appropriate accountability (1994, p. 7).

Eaton (2009) suggests that rather than allowing the government to dictate national standards, similar higher education institutions should collaborate to compare assessments of student learning and institutional performance and provide the public with aggregate results through profiles or templates. She offers that more institutions could participate in current collaborative projects, such as the Essential Learning Outcomes of the Association of American Colleges and Universities; the Voluntary System of Accountability (VSA) of the American Association of State Colleges and Universities and the Association of Public and Land-Grant Universities; the Collegiate Learning Assessment (CLA) of the Council for Aid to Education; and the Measure of Academic Proficiency and Progress (MAPP) of the Educational Testing Service. The CHEA president posits that such projects could form a basis for further discussion of “common expectations of what students are to achieve as a result of undergraduate education,” exploring additional institutionally based efforts to meet national needs (para. 19). Finally, she recommends that all stakeholders can gain by “further enriching peer/professional review through greater public involvement and disclosure” (para. 21). As Eaton (2011) notes, accreditors, government, and the academic community all have an important role in answering the question “who decides” the value and worth of accreditation, a question vital to the future of quality improvement in higher education to best serve students and society.

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