

CHEA Institute for Research  
and Study of Accreditation  
and Quality Assurance

**Is Accreditation Accountable?  
The Continuing Conversation Between  
Accreditation and the Federal Government**

Judith S. Eaton

*CHEA Monograph Series 2003, Number 1*

Council for  
Higher Education  
Accreditation  
**CHEA**<sup>®</sup>

*The Council for Higher Education Accreditation (CHEA) is a private, nonprofit national organization that coordinates accreditation activity in the United States. CHEA represents degree-granting colleges and universities and national, regional, and specialized accreditors.*

© Copyright 2003

All rights reserved. No part of this book may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, recording, or by any information storage and retrieval system, without permission in writing from the publisher.

**Council for Higher Education Accreditation**

One Dupont Circle NW • Suite 510

Washington DC 20036-1135

tel: 202-955-6126

fax: 202-955-6129

e-mail: [chea@chea.org](mailto:chea@chea.org)

[www.chea.org](http://www.chea.org)

**Is Accreditation Accountable?  
The Continuing Conversation  
Between Accreditation  
and the Federal Government**

**Judith S. Eaton, President  
Council for Higher Education Accreditation**

## TABLE OF CONTENTS

---

Executive Summary .....	1
The Accreditation-Federal Government Relationship .....	3
“Is Accreditation Accountable?” .....	4
What Are the Current Federal Expectations of Accreditation and Accountability? .....	6
What Does Accreditation Do About Accountability Defined in Terms of Performance and Outcomes? .....	9
Summary: What Are the Major Similarities and Differences Between Accreditation and the Federal Government About What Constitutes Appropriate Accountability? .....	12
Options for the Accrediting Community Responding to Calls for Additional Accountability .....	13
Recommendations for Action .....	17
Appendix A .....	21
Appendix B .....	22

# Is Accreditation Accountable? The Continuing Conversation Between Accreditation and the Federal Government

## EXECUTIVE SUMMARY

---

The federal government has relied on accreditation for the past 50 years to be accountable for the academic quality of higher education institutions and programs. This reliance, however, has been punctuated by considerable debate and difference of opinion about whether the judgments about quality provided by accreditation meet the needs of students, government, and the public. This debate usually intensifies as we undertake, every five or six years, the reauthorization of the Higher Education Act (HEA). The current reauthorization, underway in 2003 and extending into 2004, may mark a period of extraordinary divide between accreditation and the federal government on the issue of accountability. Neither students nor government nor the public will be well-served by this circumstance. All would benefit from the accreditation community and the federal government coming to terms on this issue vital to sustaining the quality of higher education and assuring access to colleges and universities.

At this writing, some members of Congress and officials in the United States Department of Education (USDE) are seeking major changes in how accreditation addresses accountability. This paper describes some of the accountability expectations of those in government in relation to accreditation, especially accountability and evidence of institution and program performance and student learning outcomes. It contrasts these government expectations with the accountability expectations of some in higher education and accrediting organizations themselves.

The paper then examines four options that are being discussed in relation to these government calls for accountability in the context of the current reauthorization. One option offered by some in higher education is to do nothing on the assumption that, in relation to the current call for accountability, "this, too, shall pass." A second option is to affirm the value and effectiveness of current accreditation practice as adequate evidence of accountability.

A third option has been offered by a member of Congress and would separate accreditation from the HEA on the grounds that the differences between what accredi-

## EXECUTIVE SUMMARY

---

tation does and what government wants cannot be reconciled. A fourth option offered here seeks to bridge the divide that appears to exist between what government wants and what accreditation does by urging accrediting organizations and higher education to take steps to address the current accountability expectations in this reauthorization, but only in the context of the federal government acknowledging that these organizations and institutions (not government) have primary responsibility for judgments about academic quality, including institution and program performance and student learning outcomes.

At present, options 1 and 2 do not resonate with members of Congress. To the contrary, some federal officials view options 1 and 2 as evidence that these institutions and accrediting organizations are unresponsive in relation to government calls for accountability. Option 3, although of interest to a few members of Congress, is not seen as desirable by many in higher education and accreditation.

Option 4 (and attendant recommendations) is put forward for additional consideration because it embodies two key principles essential to effective change in accreditation and accountability. And, it does take some (but not all) steps in the direction of the accountability changes Congress is seeking from accreditation. Option 4 is an effort to assure that accrediting organizations, institutions, and programs take additional actions with regard to accountability (including institution and program performance and student learning outcomes) *and* seeks to assure that this accountability is carried out through the current decentralized structure of higher education in which institutions, programs, and accrediting organizations sustain full responsibility for academic quality rather than cede this important responsibility to the federal government. This option stresses that responsibility for defining academic quality remains with higher education and accreditation.

## THE ACCREDITATION-FEDERAL GOVERNMENT RELATIONSHIP

Accreditation is a process of self-regulation created by higher education institutions and programs to assure and improve academic quality. This self-regulation typically involves standards developed by accrediting organizations that are used by institutions and programs to undertake self-studies. The accrediting organization then sends a team of peers to review the institution or program and, based on its standards, the accrediting organization makes a judgment about whether accredited status is achieved.

Accreditation is more than 100 years old in the United States and now involves 80 recognized accrediting organizations.\* The reach of accreditation is extensive, with more than 6,400 institutions and 18,700 programs holding accredited status in 2002.

Institutional accreditors (regional or national) review entire colleges and universities. These operations may be for-profit or nonprofit, degree-granting or nondegree-granting. Programmatic (specialized) accreditors review programs in specific fields such as law, medicine, or business.

The accreditation process became increasingly involved with the federal government during the second half of the 20th century. As demand for higher education expanded especially after the Second World War, the federal government also

The reach of accreditation is extensive, with more than 6,400 institutions and 18,700 programs holding accredited status in 2002.

expanded its federal grant and loan programs to accommodate the growing number of students attending colleges and universities. In the course of this expansion, the federal government needed reliable information about the academic quality of institutions and programs and turned to accreditation for this purpose. A valuable public-private partnership emerged.

### *Federal “Recognition”*

To confirm the reliability of the accreditors themselves, the federal government established a periodic review of these organizations (a process known as “recognition”). Federal recognition is based on standards the government has developed for this specific purpose. Recognition takes place under the aegis of the United States Department of Education (USDE) and its National Advisory Committee on Institutional Quality and Integrity (NACIQI). NACIQI reviews accrediting organizations at least every five years to determine whether the organizations meet specific standards for recognition. The standards, terms, and conditions for recognition are laid down in the Higher Education Act (HEA) in Title IV (Student Assistance), Part H (Program Integrity Triad). Established in 1965, HEA is the major federal legislation governing higher education. Current recognition standards may be found in Appendix A.

Accreditors that are “recognized” or acceptable to the federal government, in turn, review colleges, universities, and programs. Institutions and programs that meet the standards of the accrediting organization are eligible to participate in federal student aid

---

\*For a description of “recognized,” please see next section.

“Is accreditation accountable?” has been a staple of conversation between the accreditation community and the federal government throughout the course of their 50-year relationship.

programs and students who enroll may apply for these grants and loans. Accreditors on which the government relies for this purpose are sometimes called “gatekeepers,” referring to their role as portals or points of access to federal funds.

Federal recognition serves another purpose as well. Recognition standards and accompanying regulations can be used to influence accreditation to address any of a range of issues and concerns that the government may have—from the condition of physical plants to curriculum to finance. The process can be used to concentrate attention to some issues over others, e.g., student aid compliance as more important

than, e.g., facilities. Of greatest significance to higher education, government requirements placed on accreditors are quickly passed on to the institutions and programs they review.\*

## “IS ACCREDITATION ACCOUNTABLE?”

“Is accreditation accountable?” has been a staple of conversation between the accreditation community and the federal government throughout the course of their 50-year relationship. These conversations tend to become more intense whenever HEA is to be reauthorized, a process that occurs every five or six years. The 1992 and 1998 reauthorizations provide important background to the reauthorization discussion in 2003 and 2004.\*\*

### *1992 Reauthorization*

In the 1992 reauthorization, discussion of accreditation accountability focused especially on the role of accreditation in assuring that institutions and programs met administrative and fiscal responsibilities in relation to the federal student grant and loan programs contained in HEA. Accreditation was seen as a key means by which the federal government could improve the then-problematic fraud and abuse record associated with the use of student aid funds.

The 1992 reauthorization of HEA represented one of the most successful efforts to date on the part of the federal government to influence higher education through its recognition-based controls on accreditation. For the first time since 1952 (when the federal government began relying on accreditation for judgments about higher education quality), standards for federal scrutiny of accrediting organizations were built into HEA

---

\*Accrediting organizations may also be recognized by the Council for Higher Education Accreditation (CHEA), a nonprofit, nongovernmental higher education association that coordinates institutional and programmatic accreditation in the U.S.

\*\*Government expectations for accountability do not stop with accreditation. There are myriad other, additional ways outside accreditation that the federal government holds institutions and programs accountable in areas such as health and safety, civil rights, and administrative operation. There are also many federal reporting requirements that institutions and programs must meet, such as providing information for the Integrated Postsecondary Education System (IPEDS) and in response to Student Right to Know legislation.



itself. And, as a result of the 1992 reauthorization, accreditation found itself encumbered with a host of new obligations focused on institution and program compliance with student aid requirements—in addition to its obligation to assure academic quality.

### **1998 Reauthorization**

In contrast, the 1998 conversation about accreditation and accountability was more muted. Considerable attention was focused on distance learning and its impact on access to higher education. In this context, the accountability conversation centered on how accreditation could sustain quality while at the same time preclude the likelihood of fraud and abuse.

After considering several proposed major expansions of federal control of accreditation, Congress decided to ease back. It affirmed federal dependency on private, voluntary accreditation and made minor revisions that actually reduced some requirements. Rather than enacting new standards to address distance learning, for example, the 1998 amendments said that current accreditation standards would include programs of distance learning.

This mood of restraint was even more notable when Congress repealed its 1992 provision in HEA for greater state oversight of institutions known as State Postsecondary Review Entities (SPRE). Under SPRE, states would receive federal funds to employ staff to review institutions, a provision highly objectionable to many colleges and universities. SPRE was never funded and draft regulations to implement the new provision were withdrawn after serious opposition was mounted against them. The 1998 repeal of SPRE demonstrated further restraint by Congress in expanding federal controls over higher education. In 2003, the pendulum may be swinging back. Congress appears to feel little constraint in adding requirements for institutions and accrediting organizations aimed at improving the public accountability of higher education.

The 1998 reauthorization of HEA also included a Distance Education Demonstration Program—an experiment in which select colleges and universities with considerable distance learning operations that were not ordinarily eligible for federal student aid funds could participate in Title IV. The program was an opportunity to test whether these institutions could use Title IV funds while both avoiding fraud and abuse problems and sustaining quality. The program required that accrediting organizations review the proposals submitted by institutions seeking to participate in the demonstration program and comment on measures to assure quality (CHEA, 1999).

The 1998 exchanges about accountability did sharpen a bit when the discussions turned to the role of accreditation and providing information about student learning outcomes. These discussions culminated in a reordering of the federal standards for recognition of accrediting organizations with the first standard calling on accrediting organizations to assess “...success with respect to student achievement in relation to its mission...” The intent of this reordering was a matter of some debate. Some members of NACIQI, for example, maintained that placing this standard first meant that student achievement was the most important factor to be addressed by accreditors. Others on the committee maintained that the reordering was not intended to give primacy to student achievement.

In a crucial shift in thinking, federal officials have moved from “Accrediting organizations are accountable if they do a responsible job of carrying out reviews” to “Accrediting organizations are accountable if they do a responsible job of carrying out reviews *and there is evidence that institutions and programs perform well and that students learn.*”

## WHAT ARE THE CURRENT FEDERAL EXPECTATIONS OF ACCREDITATION AND ACCOUNTABILITY?

Initially, accrediting organizations were considered “accountable” if they carried out their reviews in a manner the government considered to be responsible. In general, this meant that accrediting organizations examined the areas required by USDE recognition standards (e.g., curriculum, student affairs, academic standards; see Appendix A) and carried out this examination in a consistent and fair manner as also required by the standards. For the most part, the standards required accreditors to examine the resources and processes of institutions and programs. “Resources” refers to essentials such as adequate financing, a credentialed faculty, and appropriate technology support. “Processes” refers to,

e.g., assessment procedures and faculty evaluation. Neither the federal government nor accreditors gave primary attention to performance and outcomes at this time.

More recently, however, expectations of accrediting organizations have expanded. Federal officials now also want evidence about how well institutions and programs perform and how well students learn in order that accreditation be considered “accountable.” This evidence might be supplied either by the accrediting organizations or by the institutions and programs they accredit. In a crucial shift in thinking, federal officials have moved from “Accrediting organizations are accountable if they do a responsible job of carrying out reviews” to “Accrediting organizations are accountable if they do a responsible job of carrying out reviews *and there is evidence that institutions and programs perform well and that students learn.*”

Accreditation’s capacity to produce this evidence of performance and outcomes has been an early focus of the federal government in the current accountability conversation.

“Performance” refers to the results of the efforts put forth by an institution or program such as graduation, transfer, achievement of other educational goals, or entry to graduate school. “Student learning outcomes” are the knowledge, skills, and abilities that a student has attained as a result of engagement in a particular set of higher education experiences. The federal government expects that accreditation will provide—or cause institutions and programs to provide—evidence to answer questions such as, “What do higher education institutions and programs accomplish?” and “What happens to the students who enroll in these institutions and programs?”

Some in the federal government have also raised important issues about the use of this evidence. These officials have discussed establishing national standards of performance and outcomes for all institutions and programs. Others have talked

“Performance” refers to the results of the efforts put forth by an institution or program such as graduation, transfer, achievement of other educational goals, or entry to graduate school. “Student learning outcomes” are the knowledge, skills, and abilities that a student has attained as a result of engagement in a particular set of higher education experiences.

about developing ranking systems or other vehicles by which to compare institutions and compare programs. There is discussion, for example, about “institutional report cards” and a “National Report” from the U.S. Secretary of Education on the effectiveness of institutions and programs. Federal officials are well aware that similar evidence of performance and outcomes in the areas of graduation, persistence, and job placement can readily be used to make comparisons among institutions or among programs. These comparisons can provide a basis for judgments for, e.g., awarding federal funds or other government decisions.

In many ways, this current conversation about accountability reflects the confluence of three circumstances. First, it is a reflection of a significant extension of federal control over accreditation created by the 1992 reauthorization. Second, it is a continuation of the student learning outcomes discussion of 1998. Third, the conversation affirms the current administration's desire to carry the accountability discussion associated with reauthorization of the Elementary and Secondary Education Act (ESEA) in 2001 into higher education reauthorization. ESEA is the federal legislation governing elementary and secondary education and its 2001 reauthorization (“No Child Left Behind”) is especially characterized by its emphasis on accountability for results through national standards and “high stakes” testing. If the federal government can demand—and obtain—accountability mechanisms of this sort for elementary and secondary school efforts, why not for colleges and universities?

Given the extent of federal investment, it is reasonable for the federal government to expect accreditation and all of higher education to be accountable for its performance, including what students learn.

### ***Reasons for Saying “Yes, the Federal Government Should Hold Accreditation Accountable for Evidence of Performance and Outcomes.”***

*Should* the federal government hold accreditation accountable for evidence of institution and program performance and student learning outcomes? A number of significant reasons for saying “yes” are offered by various government officials in the executive and legislative branches. While there is no consensus here and opinions vary greatly, some general themes have emerged.

The *first* reason for saying yes is financial: in 2002, the federal government provided approximately \$69 billion in student grants and loans through HEA (Hartle et al, 2003). Given the extent of federal investment, it is reasonable for the federal government to expect accreditation and all of higher education to be accountable for its performance, including what students learn.

A *second* reason for saying yes is tied to the federal government's expectation that accreditation, if it is a viable and vital form of self-regulation, should do a more effective job of routinely providing (or causing institutions and programs to provide) more information about performance and outcomes than is now available. If accreditation cannot, at the very least, take responsibility for making this evidence available or working with institutions and programs to make this evidence available, ask some officials, what is its value?

Some in government are quite critical of some accrediting organizations in this regard, maintaining that accreditation is willing to provide information about many

Both concern for protecting students and the public and for making more information about performance and outcomes available to the public (as described above) have resulted in some government officials pressing accrediting organizations in the direction of greater openness.

features of colleges and universities, such as governance and organizational structure, yet displays some reluctance to obtain and share information about institution and program performance and provide evidence that students have learned. These critics acknowledge that information about the operation and organization of institutions and programs is useful. They object to what they take to be the extensive reliance of accreditation on these features of higher education at what they believe is the price of adequate attention to performance and outcomes.

The *third* reason offered by the federal government is that by holding accreditation accountable for performance and outcomes, federal officials are carrying out such key responsibilities as protecting students and the public. These officials reason that there needs to be some mechanism for sorting quality institutions and programs from dubious higher education operations. Institutions and programs that produce results need to be sorted from those that do not. These officials also reason that accreditation, as the primary source of external quality assurance, should provide the assistance needed to make these determinations.

This sorting for quality has become even more complex of late, with a growing number of new providers of higher education (e.g., corporations), expansion of higher education offerings through distance learning, and increased interest in international higher education. This growth in the diversity of the type and range of higher education offerings makes it all the more important that accreditation provide this evidence about performance and outcomes, assisting students and the public to make sound decisions about education.

In this context, some in government are also urging accrediting organizations to provide more information to the public about both the results of accreditation reviews (whether an institution or program achieves accreditation) and the basis for these accreditation decisions. Both concern for protecting students and the public and for making more information about performance and outcomes available to the public (as described above) has resulted in some government officials pressing accrediting organizations in the direction of greater openness.

A *fourth* reason put forward from the federal government has to do with the increasing centrality of higher education in our society. Higher education now affects a significant majority of the population, with 63 percent of high school completers enrolling in some form of postsecondary education immediately following graduation in 2000 (USDE, 2002). Society has come to view higher education as not only desirable, but also as a necessity for economic and social well-being. And, recent data from the United States Census Bureau confirms this view. The higher the level of degree attainment, the greater the level of earnings for full-time, full-year workers. Ph.D. recipients earn, on average, \$89,400 per year while associate degree recipients earn \$38,200 and high school dropouts earn \$23,400 (HENA, 2002). In an environment of higher education-as-necessity, evidence that can be provided from accreditation about institution and program performance and student learning outcomes is critical.

Various federal officials, then, believe they offer strong reasons on which to base demands for evidence of institution and program performance and student learning outcomes from accreditation. These reasons center on the significant public expenditure for higher education, the obligation that accreditation has to provide information to the public about academic quality, the federal obligation to protect students and the public from dubious providers of higher education in an environment marked by an increasing number of sources and delivery systems for higher education, and the extent to which higher education degrees have become entry credentials for many valuable jobs.

## **WHAT DOES ACCREDITATION DO ABOUT ACCOUNTABILITY DEFINED IN TERMS OF PERFORMANCE AND OUTCOMES?**

Accreditors—and the institutions and programs they review—are quite responsive to the public and government interest in accountability as they engage the reauthorization of HEA. They point, with justification, to their success in meeting federal recognition standards to date. And, they remind us that these standards have focused primarily on an examination of resources and processes that was carried out in a procedurally correct manner.

At present, different types of accreditors collect varying types of evidence of quality as they carry out accreditation reviews. Regional (institutional) accreditors that review primarily degree-granting, nonprofit operations rely heavily on the resources and processes of these operations to make judgments about quality. The review of processes includes significant attention to the various means used by institutions to evaluate student learning (e.g., assessment). Regional accreditors report that they currently review evidence of institutional performance and are beginning to collect direct evidence of student learning outcomes as part of their judgments about quality or accredited status.

National (institutional) accrediting organizations that review large numbers of for-profit operations (degree or nondegree) also rely on resources and processes. In addition, they provide quantitative evidence of institutional performance and student learning outcomes and annually report, e.g., completion rates, job placement rates, and pass rates on licensing examinations. And, these accreditors must verify the student learning outcomes data they collect.

Specialized (programmatic) accreditors provide information about resources and processes. They also amass a good amount of information about student learning outcomes, especially in relation to the requirements of a particular profession. Approximately 85 percent of recognized accreditors report that they give significant weight to evidence of student learning outcomes or competencies in their judgments about quality (CHEA, 2002). This evidence is often augmented by state licensure examinations that also require demonstration of competencies in many fields such as nursing, medicine, or law.

Some accreditors, especially those that review primarily nonprofit institutions and programs, voice concern about the crucial shift in federal expectations from “accreditation reviews are carried out in a responsible manner” to “accreditation reviews are

carried out in a responsible manner *and there is evidence that institutions and programs perform well and that students learn* (above, p. 6)” To these accreditors, this shift involves too heavy a reliance on evidence of performance and outcomes in contrast to relying on the recognition standards that have been, as indicated above, primarily focused on resources and processes. These accreditors also have some concerns that this type of evidence might be used to develop a template for standards of quality that may be inappropriate to higher education, e.g., narrowly tailored quantitative measures that cannot encompass the complexity of the higher education experience.

***Reasons to Say, “Wait, Accreditation Should Challenge a Primary Reliance on Performance and Outcomes.”***

Various accreditors offer different points of view about accreditation accountability and there is little consensus to date about the role of evidence of performance and outcomes in their respective judgments about quality. Here, too, however, several themes have emerged. Many accreditors wish to sustain their flexibility and remain free to choose among various types of evidence that may be available. This is especially important to the eight regional accreditors who review a quite diverse collection of often complex institutions. Because of this need for flexibility, accreditors offer a number of important reasons to challenge a government movement toward primary reliance on evidence mainly of institution and program performance and student learning outcomes.

The *first* reason offered by some accreditors is that accreditation is already accountable when providing evidence about the resources and processes necessary for institution and program quality. Information about resources and processes, in the eyes of a number of accreditors, has historically met government expectations of accountability. And, while accrediting organizations also rely on performance and outcomes, they point out that this should not be done at the price of attention to resources and processes. Individual accrediting organizations, working with institutions and programs, rely on a mix of information (resources, processes, performance, and outcomes) to constitute viable evidence of accountability.

The *second* reason for challenge offered by accreditation is based on the incompatibility between the evidence of performance and outcomes that is being sought by the federal government and the particular nature of the higher education experience. Higher education, especially education leading to a degree, is an experience that involves the individual student, other students, faculty, and others in a campus environment. To attempt to capture this experience by attention only to a short list of performance indicators and outcomes would be, at best, incomplete. In addition, there are results of an educational experience that may not be known for years and are not readily discernable. When, for example, have students achieved general education skills? When, if ever, is education in the liberal arts complete? Can we really “measure” such things as the capacity for independent intellectual inquiry or analytic resourcefulness?

The incompatibility concern is exacerbated by the unavailability of appropriate tools to adequately describe the higher education experience using the language of performance and outcomes. The history of student learning outcomes makes it clear that indicators that have been developed to date are primarily quantitative in nature. Many in



higher education argue that quantitative indicators may be appropriate for some vocational training areas, but not for the complexity of a comprehensive undergraduate experience for many students. Quantitative indicators may be useful to determine skills in word processing, for example, but not to determine skills in painting or history.

A *third* reason offered by some accreditors speaks to preserving institution and program autonomy, the long and successful tradition of mission-driven and decentralized institution- and program-based responsibility for academic matters such as academic standards, curriculum, and faculty. This autonomy has helped to produce a diversity that many in higher education—and government—believe has been essential to a college and university system that is routinely described as “the best in the world.”

Accreditors express concern that addressing accountability primarily through evidence of performance and outcomes can lead, intentionally or unintentionally, to the establishment of a single template for the quality of higher education institutions and programs, thereby eroding diversity. A single template (e.g., for curriculum or faculty) could encourage uniformity among institutions and programs at the price of the diversity of higher education and the rich array of types of institutions and, thus, opportunities for students.

A *fourth* reason from accreditation has to do with reluctance to replace the longstanding accreditation-federal government partnership with what is perceived to be an unequal relationship in which systematic government dominance and intrusion would likely prevail. During the past 50 years, accreditation and the federal government alike have presented themselves as working partners as distinct from accreditation simply reacting to government dictate, assuming a subordinate role or being treated as an “arm of the government.” Some who oppose greater emphasis on institutional performance and student learning outcomes are, in part, reacting to what they believe is government telling higher education how it must operate, thereby violating that partnership. They further believe that yielding to government in this sphere encourages a continuing rise in government intrusion in other areas. And, they believe that accepting government intrusion means a diminution of the viability of higher education.

In sum, accreditation relies on a mix of evidence about the resources and processes as well as the performance and outcomes of institutions and programs when making accreditation judgments. While evidence of institutional performance and student learning outcomes may be useful, it is not the only evidence that is needed. Indeed, accreditors point out that developing and using such evidence, especially at the institutional level, may simply not be feasible. Accreditors also maintain that relying heavily on performance and outcomes would undermine the autonomy and diversity of higher education that has produced its great success. Finally, accreditors want to sustain a working partnership with government.

When, for example, have students achieved general education skills? When, if ever, is education in the liberal arts complete? Can we really “measure” such things as the capacity for independent intellectual inquiry or analytic resourcefulness?

## **SUMMARY: WHAT ARE THE MAJOR SIMILARITIES AND DIFFERENCES BETWEEN ACCREDITATION AND THE FEDERAL GOVERNMENT ABOUT WHAT CONSTITUTES APPROPRIATE ACCOUNTABILITY?**

In the current accountability conversation, both accreditors and the federal government tend to agree on three issues:

- It is essential that accreditation be accountable to higher education, students, and the society.
- This accountability is achieved by developing and using evidence of the effectiveness of institutions and programs.
- This evidence of effectiveness is a mix of information about resources, processes, institution and program performance, and student learning outcomes.

On the other hand, a number of accreditors and some officials in the federal government tend to disagree on two issues:

### ***The Relative Importance of Various Types of Evidence***

- To many in the accrediting community, all of the four types of evidence mentioned above are important for accreditation judgments: evidence of resources, processes, institution and program performance, and student learning outcomes. In this context, accreditors question the extent to which evidence of performance and outcomes can be fully enough developed and applied to render evidence about resources and processes significantly less important.
- To many in the federal government at this time, two types of evidence—institution and program performance and student learning outcomes—are becoming dominant in the quest for accountability. Evidence of resources and processes is playing a lesser role.

### ***Locating Fundamental Responsibility for Evidence of Performance and Outcomes with Institutions and Programs***

- To many in the accrediting community, it is essential to preserve the authority and responsibility of institutions and programs in decisions about academic matters such as standards, curriculum, and faculty. Development of evidence of performance and outcomes, to the extent that it can be done well, must take place in the context of institution- or program-based judgments in these areas.
- To many in the federal government, reducing reliance on institution- or program-based judgments may be acceptable—if this will yield additional information about comparability and national expectations with regard to institution and program performance and student learning outcomes. Information about comparability and relationships of institutions and programs to national expectations is viewed as further aiding students and the public to make good decisions about attending a college or university or enrolling in a specific program area.



## OPTIONS FOR THE ACCREDITING COMMUNITY RESPONDING TO CALLS FOR ADDITIONAL ACCOUNTABILITY

As the most recent accreditation–federal government conversation is proceeding, four options are being discussed to respond to government calls for additional accountability from accreditation. Some of these options emerge from the deliberations within accreditation and higher education; one emerges from the Congress.

One option put forward is to do nothing based on a belief that current government accountability demands are likely not to be realized and, thus, need not command attention. Another option is to make the case that accreditation in its current form is indeed accountable—albeit in ways that vary from what some in government are seeking. Some in Congress and USDE take the offering of these two options as evidence that neither higher education nor accrediting organizations wish to be fully responsive to the accountability concerns that government has expressed. In this context, these options appear unlikely to succeed and could run the risk of triggering significant additional statutory or regulatory attention to academic quality during this reauthorization.

A third option, decoupling accreditation from Title IV, has been offered through Congress and would likely assure that government, in some form or another, would replace accreditation by attempting a major federal or state role in academic quality review for the future. At present, this option is resisted in the higher education and accreditation communities, and there appears to be limited interest in this option in the Congress.

A fourth option (and attendant recommendations) is offered here in the hope of bridging the divide between accreditation and government and preserving the accreditation–federal government partnership such that it remains mutually beneficial. This option does move part way (but not fully) in the direction sought by Congress and USDE by including a commitment to additional accountability. Option 4 also embraces a fundamental principle about locating responsibility for academic quality in institutions and programs and relying on accreditation to assure that quality expectations are met. This option stresses that defining and assuring academic quality is best served through the higher education establishment, not through federal government control.

### ***Option 1: Doing Nothing Because “This Too Shall Pass”***

One option is to do nothing about the current pressure for accountability in this reauthorization, based on the belief that further federal government efforts to obtain evidence of institution and program performance and student learning outcomes will go the way of past government efforts at accountability in higher education.

#### Options for Responding to Calls for Additional Accountability

- Do nothing—“This, too, shall pass”
- Reaffirm the effectiveness and value of accreditation
- End the accreditation–federal government partnership
- Bridge the divide between accreditation and government

For example, during the 1980s and 1990s, most states sought greater accountability from higher education through calls for information on performance and outcomes. However, as The National Policy Center for Public Policy and Higher Education's *Measuring Up 2000* and *2002* show, few, if any, states today have reliable information about the student learning outcomes of their public colleges and universities. Even acknowledging the differences between policies and politics at the state and federal levels, the same fate may await federal officials trying to press their image of accountability on accreditation. This might be described as a "this, too, shall pass" option on the part of some in accreditation and higher education.

The major advantage of this option to the accreditation community is that it has worked in the past and has left accreditation free to address accountability as it saw fit. The major disadvantage—if this option does not work—is the increased likelihood of federal stipulation of evidence for performance and outcomes, either through changes in the law that affect accreditation or through direct action aimed at higher education institutions and programs. At the extreme, government might try to reinvent the SPREs mentioned above (p. 5). In either event, institutions and programs may find themselves answerable to additional federal requirements for evidence for performance and outcomes that cannot be obtained through accreditation.

### **Option 2: Reaffirm the Effectiveness and Value of Accreditation as It Currently Operates**

Accreditation is

- Responsive to large changes
- Fundamental to higher education's commitment to quality
- Instrumental in sustaining core academic values
- An important service to students, employers, and government

A second option offered by some in higher education and accreditation is to reaffirm that the effectiveness and value of accreditation as it currently operates is a clear indication that accreditation is, indeed, accountable. The long history of accreditation yields impressive evidence of this effectiveness and value. First, accreditation has a significant track record of responsiveness to large changes in a system of higher education that has a history of profound success. Second, accreditation has been, and remains, fundamental to higher education's overall commitment to quality improvement and a culture of quality. Third, accreditation has been instrumental in assuring that the core academic values of higher education have been sustained. Fourth, accreditation has served students, employers, and government well as these constituents make personal, financial, and political decisions that involve higher education.\*

Accreditation is not the sole means by which higher education assures and improves quality. Accreditation is buttressed by an enormous amount of effort that goes into quality improvement from many other parts of the higher education enterprise, e.g., professional academic associations, academic departments, and consultants. Accreditation, however, has historically been the linchpin of quality review efforts of programs, schools, and institutions.

---

\*Please see Appendix B for an elaboration of the effectiveness and value of accreditation.

The major advantage of this second option of reaffirming the effectiveness and value of accreditation is that it reminds society and government that accreditation is a major contributor to higher education success and quality improvement as well as an essential source of core values. This effectiveness and value are a clear response that accreditation plays a vital role in accountability to students, government, and the public.

The major disadvantage of this option is that, as important as the effectiveness and value of accreditation are to the higher education community, this does not mean accreditation addresses the emerging accountability expectations of the federal government. That which the federal government is seeking is not fully answered by a statement of the effectiveness and value of accreditation to higher education.

### ***Option 3: End the Partnership Between Accreditation and the Federal Government***

A third option is for accreditors to attempt to “de-couple” accreditation and Title IV funds. That is, accreditors would give up the gatekeeper role in relation to federal funds. This option has been around for many years and has once again surfaced in the U.S. House of Representatives in HR 5501, introduced in the 107th Congress, and HR 858, introduced in the current 108th Congress. If enacted, the federal government would find some other means by which to determine whether institutions and programs are eligible to participate in Title IV.

The major advantage of this option is that it frees accreditation from federal compliance responsibility and provides the opportunity for accreditation to fully focus its energy on quality improvement. In the eyes of a number of advocates for accreditation, this is accreditation's proper role. Accreditation should sustain its tradition of serving primarily the higher education community through aiding institutions and programs in the enhancing of academic quality.

There are two major disadvantages associated with this option. For the accreditors, it likely heralds the future irrelevancy of accreditation to at least some percentage of constituents such as students, the public, and government. And, some in higher education may wonder why they should bother with accreditation if it does not produce a tangible result such as eligibility for federal funds. Second, for institutions and programs, this option likely assures that the federal government will find a way to replace the accreditation scrutiny of academic quality with some government mechanism on the grounds that continuing to award federal aid to students requires this examination of the institutions and programs they attend.

Decoupling, at least initially, would likely disadvantage society as well. If accreditation does not carry out the gatekeeper function, the students, employers, governments, and public who rely on accreditation for access to federal or state funds would be at something of a loss. Accreditation would likely be replaced—a long and arduous (and expensive) task likely involving a significant period of uncertainty about financial support.

#### **Option 4: Bridge the Divide Between Accreditation and the Federal Government**

There is a fourth option: accreditors and federal officials working together to address the changing environment of accountability and influencing each other's expectations of accountability. Accreditors, institutions, and programs *can* do more to provide evidence of performance and outcomes. The federal government *can* formally acknowledge that these efforts are achieved most effectively through the current decentralized, mission-based system of higher education.

Accreditors, institutions, and programs *can* do more to provide evidence of performance and outcomes.

The major advantage of this option is the creation of additional rapprochement between accreditation and the federal government on the accountability issue and preservation of the public-private partnership. This would be of significant service to students, to higher education itself, to government, and to society. The rapprochement can result in greater shared understanding, enhanced mutual respect, and an invigoration of the

longstanding public-private commitment of accreditation and the federal government. The 50-year relationship remains intact.

The great success of the U.S. in many fields—well beyond higher education—is attributable to the unusual capacity in this country to bring together the energy of the public and private sectors in a shared commitment to a worthy societal goal. The accreditation-federal government partnership is one powerful example of this shared commitment. The academic quality of higher education is a worthy societal goal. The success of this shared commitment has rested on government's strength and willingness to accept the leadership of the accreditation community and higher education in the definition of academic quality in higher education.

Federal officials *can* rely on higher education institutions and programs to determine appropriate expectations and evidence of performance and outcomes for their respective operations.

One major disadvantage of this option of bridging the divide would be, from the perspective of some in higher education, at least some capitulation of accreditation to compliance demands of the government. To some, accreditation's fundamental purpose has already been badly distorted by its partnership with the federal government and this effort would be the latest in accreditation's yielding to what is perceived to be an ongoing attack on accreditation.

Another disadvantage would be, from the perspective of some in government, a lack of national standards and of an ability to make instant comparisons among institutions and programs. Accepting a decentralized, mission-based approach to evidence of performance and outcomes would likely slow the march to a nationalizing of quality expectations. Accreditation would not provide a single template by which the students, the public, and government can judge institutions and programs. At this writing, these disadvantages make it unlikely that this option and its recommendations (below) would be enthusiastically received.

## RECOMMENDATIONS FOR ACTION

To bridge the divide between accreditation and government, four actions can be helpful:

- The accrediting community, institutions, and programs develop and share additional evidence of institution and program performance;
- The accrediting community, institutions, and programs develop and share additional evidence of student learning outcomes;
- The accrediting community shares additional information about the “findings” or results of accreditation reviews; and
- The federal government affirms the principle of decentralization of judgments about academic quality based on performance and outcomes: Primary responsibility for defining expectations and evidence performance and student learning outcomes rests with the institutions and programs.

The great success of the U.S. in many fields—well beyond higher education—is attributable to the unusual capacity in this country to bring together the energy of the public and private sectors in a shared commitment to a worthy societal goal.

### ***Recommendation 1 (Performance). Additional Attention to Evidence of Institution and Program Performance***

One way that accrediting organizations can respond to the call for accountability is to work with institutions and programs to more fully develop the capacity for providing evidence of institution or program performance. Students, government, and the public consistently express interest in meaningful information about performance in higher education as a basis for decisions they must make.

One approach to providing this evidence is for an institution or program to develop an individual profile of performance accompanied by performance indicators. In this context, attention to institutional or program mission is critical. Each institution or program would decide what counts as its success, taking into account key factors such as the type of institution, its admissions requirements, level of selectivity, and program mix. Some institutions and programs may use indicators such as achievement of educational goals short of a degree, graduation rates, or admission to graduate school. Those that specialize in vocational training may look at job placement as an indicator.

Private liberal arts colleges may use a performance profile to emphasize student progress in general education as an indicator. Comprehensive institutions may prefer that outcomes be developed at the department, program, or school level. The goal or expectation of performance in relation to each indicator would also be influenced by the history of the institution and the students it serves. Definitions of the indicators used by each institution or program would be needed.

### ***Recommendation 2 (Outcomes). Additional Attention to Evidence of Student Learning Outcomes***

Most accreditors do not wish to be responsible for deciding the student learning outcomes of individual institutions and programs.\* Accreditors are responsible, however, for working with institutions and programs to assure that these operations identify desired student learning outcomes at, e.g., the course, program, or degree levels and develop evidence that these outcomes are realized. Expectations of use of evidence of student learning outcomes by institutions and programs can vary from accreditor to accreditor and be augmented by information about institution or program resources (e.g., finances) or processes (e.g., initiatives to gather evidence of student learning) as part of the determination of academic quality.

Many accrediting organizations have already taken significant steps in this direction. National accrediting organizations that review large numbers of for-profit institutions, as indicated above, are required by the federal government to provide evidence of, e.g., student learning outcomes and job placement for some programs. Regional accrediting organizations currently require that institutions provide evidence that the practices used to evaluate student learning outcomes are in place. These accreditors can take the next step of asking institutions to develop and use expectations of what counts as success with regard to these outcomes. This would be followed by an institution making a judgment about its own quality, based on the comparison of what students learn with the institutional expectations of student learning.

### ***Recommendation 3 (Accreditation Information to the Public)***

The findings from accreditation reviews are valuable to accreditors, institutions, and programs. Some of this information would also be valuable to students, the public, and government, especially if it is accompanied by explanation from accreditors about the basis for these findings. At the same time, providing this information cannot occur at the price of compromising the zone of privacy needed for institutions and programs to obtain candid advice about quality improvement. Some discretion is essential for the accreditation process to assist institutions and programs to make the difficult decisions often involved in sustaining high quality.

Some discretion is essential for the accreditation process to assist institutions and programs to make the difficult decisions often involved in sustaining high quality.

Accreditors, working with their institutions and programs, can explore additional means to routinely provide clear and concise summaries of the results of accreditation reviews. This alternative may be preferable to making either accreditation self-study documents or team reports public—a matter of some debate within accreditation and higher education.

Findings of accreditation reviews can be made available after a comprehensive visit or other accreditation interventions such as focused visits. Accreditors and their institutions and programs would need to decide who should carry out this responsibility and how it

---

\*Some specialized accreditors, working with their programs, do establish standards for student learning outcomes. This is especially the case with programs that lead to licensure.

should be carried out. Some accreditors already provide “public disclosure statements” on which they can build. Some institutions and programs already make considerable information about accreditation findings available with, e.g., press releases and Websites.

Providing additional information to students, government, and the public would significantly strengthen the role of accreditation in society. Making additional information about accreditation findings available would contribute to the view that self-regulation in higher education is additionally effective and that further government regulation of colleges and universities is not needed.

***Recommendation 4 (Decentralization of Judgments About Academic Quality Institutional and Program Academic Authority for Performance and Outcomes)***

Institutions and programs must be responsible for deciding expectations and evidence of performance and outcomes. This is central to their role in defining academic quality in higher education. The federal government cannot fully benefit from the added value of additional information about institution and program performance and student learning outcomes without assuring that this information is developed and used within the context of the decentralized system of higher education that currently prevails.

The accreditation-federal partnership will benefit from elected and government officials acknowledging that higher education “works” because colleges and universities have this freedom to define academic quality. With all respect, government-defined academic quality is unlikely to achieve a similar level of success. The key here is for accreditation and government to realize each other’s strengths and capacity.



These actions—accrediting organizations, institutions, and programs expanding commitment to evidence of performance and outcomes, providing more information about the findings of accreditation reviews, and the federal government affirming its commitment to accountability through the decentralized, mission-based system of higher education—are vital to bridging the current divide between accreditation and the federal government. Taken together, they can constitute the next major phase of the valuable partnership between accreditation and the federal government.

“Is accreditation accountable?” Yes, it is. However, what it means to be accountable is often in the eye of the beholder—in this case, either the eye of the federal government or the eye of the accreditor. The current reauthorization of HEA is a constructive opportunity for accreditation and the federal government to reconcile their respective expectations of accountability in the service of assuring academic quality.



## SOURCES

Council for Higher Education Accreditation. *HEA 98-Summary of Accreditation Provisions*. Also available at [www.chea.org/government/HEA/98\\_10Summary.cfm](http://www.chea.org/government/HEA/98_10Summary.cfm). July 1999.

Council for Higher Education Accreditation. *Specialized Accreditation and Assuring Quality in Distance Learning*. Washington, DC. CHEA Monograph Series 2002, Number 2. Also available at [www.chea.org/Research/index.cfm](http://www.chea.org/Research/index.cfm).

Hartle, Terry; Christopher Simmons; Becky Timmons. *Paying for College: How the Federal Higher Education Act Helps Students and Families Pay for a Postsecondary Education*. Washington, DC: American Council on Education, 2003. Also available at [www.acenet.edu](http://www.acenet.edu).

Higher Education and National Affairs. "Facts in Brief: Economic Benefits of Higher Education Continue to Grow." Volume 51, #14, July 29, 2002. Also available at [www.acenet.edu/hena/facts\\_in\\_brief/2002/07\\_29\\_02\\_fib.cfm](http://www.acenet.edu/hena/facts_in_brief/2002/07_29_02_fib.cfm).

The National Center for Public Policy and Higher Education. *Measuring Up 2002: The State-by-State Report Card for Higher Education*. San Jose California. 2002.

United States Department of Education. National Center for Education Statistics. *The Condition of Education: Student Effort and Education Progress*. Also available at <http://nces.ed.gov/programs/coe/2002/section3/indicator20.asp>.



## APPENDIX A

### UNITED STATES DEPARTMENT OF EDUCATION RECOGNITION STANDARDS

Required Standards and their Application (as of July 1, 2000)

602.16 Accreditation and preaccreditation standards.

- (a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if—
  - (1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:
    - (i) Success with respect to student achievement in relation to the institution's mission, including as appropriate, consideration of course completion, State licensing examination, and job placement rates.
    - (ii) Curricula.
    - (iii) Faculty.
    - (iv) Facilities, equipment, and supplies.
    - (v) Fiscal and administrative capacity as appropriate to the specified scale of operations.
    - (vi) Student support services.
    - (vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.
    - (viii) Measures of program length and the objectives of the degrees or credentials offered.
    - (ix) Record of student complaints received by, or available to, the agency.
    - (x) Record of compliance with the institution's program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency.

*Source: Current List of Nationally Recognized Agencies and State Agencies Recognized for the Approval of Public Postsecondary Vocational Education and Nurse Education and the Criteria for Recognition by the U.S. Secretary of Education. United States Department of Education, Office of Postsecondary Education. June 2000.*

## APPENDIX B

### THE EFFECTIVENESS AND VALUE OF ACCREDITATION

#### *Accreditation Has Proved Responsive to Large Changes in the Highly Successful Higher Education Enterprise*

Accreditation, as the basic mechanism developed and used by higher education for self-scrutiny and self-criticism for more than a century, has been a valuable resource for assuring quality as higher education has grown and diversified over the years. Assuring quality during periods of significant alterations has been key to accountability to students, government, and the public.

As enrollments in higher education increased especially after the Second World War, accreditation assured that existing institutions expanded in a manner that provided ongoing quality offerings to the many thousands of new students. As higher education diversified as well, accreditation developed the capacity to assure quality for the new types of institutions emerged, from community colleges in the 1950s and 1960s to virtual universities in the 1990s. Accreditation has been central to assuring quality as for-profit higher education has expanded. Most recently, accreditation has provided valuable assistance to many institutions as they established distance learning and online instruction to complement site-based education and greatly expanded international offerings.

Many in accreditation also express great confidence in the depth and extensiveness of the capacity of accreditation for reform, especially in the past ten years. During this time period, institutional and programmatic accreditation have undergone a number of significant changes. For example, in addition to responsiveness to major changes in higher education mentioned above, there is also much more attention to, e.g., student learning outcomes, to undergraduate education, and to “assessment” or analysis of whether institutions and programs provide appropriate conditions for learning.

#### *Accreditation is Key to Sustaining a Culture of Quality*

Accreditation has been and remains fundamental to higher education’s commitment to quality improvement and the creation of a culture of quality. Both are essential to accountability to students, government, and the public. A consistent feature of the work of faculty and academic administrators in thousands of colleges and universities is a dedication to strengthening courses, programs, and degrees for students. What can be done to improve curriculum? To address academic standards? To improve teaching? Professional development of faculty has been central to accreditation’s expectations of institutions and programs. Accreditation has required that major changes in curriculum and the development of new programs and degrees take place in an environment of thoughtful research and consultation. As colleges, universities, and programs make significant changes

*(continued on next page)*

*(continued from previous page)*

in operation, facilities, and programs, they are dependent on accreditation to affirm the quality of these efforts.

#### *Accreditation Sustains Core Academic Values*

Accreditation has been instrumental in assuring that the core academic values of higher education have been sustained over time. These values are part of a sound foundation from which efforts at accountability can proceed. Although there is no single, explicit list of these values to which all in higher education overtly subscribe there is a set of values implicit in the ongoing work of faculty and academic administrators. These include the valuing of general education and the liberal arts, commitment to academic freedom and institutional autonomy, insistence on collegial governance, and a dedication to higher education as a community of learning. These values may be found in the standards and policies of many accrediting organizations. And, participation in accreditation review is a key means by which colleges and universities reaffirm these values.

#### *Accreditation Serves Students, Employers, and Government*

Accreditation provides important service to students, employers, and government by assisting these constituents in making crucial decisions about college attendance or supporting higher education. When a student makes the critical determination about what college or university to attend, he or she wants to know whether the institution is accredited. When employers hire new employees, they often stipulate that the applicant must have graduated from an accredited institution. When these same employers agree to finance the continuing education of existing employees, they often require that these employees attend accredited institutions. The federal government requires that students attend accredited institutions as a condition of receiving a grant or loan. State governments, too, often require that institutions receiving state assistance be accredited and that the students who receive financial assistance attend an accredited institution. State licensure and certification of individuals in various professions, similarly, relies on these individuals graduating from accredited programs.

## **2003-2004 CHEA Board of Directors**

Arthur J. Rothkopf, *Chair*, President, Lafayette College  
Malcolm Gillis, *Vice Chair*, President, William Marsh Rice University  
Eleanor Baum, *Secretary*, Dean, Engineering School, The Cooper Union  
Richard P. Traina, *Treasurer*, Trustee, George I. Alden Trust  
Michael F. Adams, President, University of Georgia  
R. Judson Carlberg, President, Gordon College  
Vernon O. Crawley, President, Moraine Valley Community College  
Gerald G. Garbacz, Managing Director, G3 LLC  
Robert B. Glidden, President, Ohio University  
N. Victor Goodman, Partner, Benesch, Friedlander, Coplan & Aronoff LLP  
Nancy A. Marlin, Provost, San Diego State University  
Margaret A. McKenna, President, Lesley University  
Karen W. Morse, President, Western Washington University  
Charles R. Nash, Vice Chancellor for Academic Affairs, The University of Alabama System  
Gregory M. O'Brien, Chancellor, University of New Orleans  
Earl S. Richardson, President, Morgan State University  
Piedad F. Robertson, Superintendent/President, Santa Monica College

# CHEA<sup>®</sup>

## **Council for Higher Education Accreditation**

One Dupont Circle NW • Suite 510

Washington DC 20036-1135

tel: 202-955-6126

fax: 202-955-6129

e-mail: [chea@chea.org](mailto:chea@chea.org)

[www.chea.org](http://www.chea.org)

# CHEA<sup>®</sup>

**Council for Higher Education Accreditation**

One Dupont Circle NW • Suite 510

Washington DC 20036-1135

tel: 202-955-6126

fax: 202-955-6129

e-mail: [chea@chea.org](mailto:chea@chea.org)

*[www.chea.org](http://www.chea.org)*