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TOWARD FRAMING THE FUTURE ROLE OF ACCREDITATION: THE PROBLEM, SUGGESTIONS, CAUTIONS

Remarks provided to the National Advisory Committee on Institutional Quality and Integrity

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WHAT IS THE PROBLEM?

The national conversation about accreditation that has taken place during the past year often begins with a questionable premise: Accreditation is somehow "broken" and must be fixed. Whether in the Congress, the U.S. Department of Education (USDE) or, indeed, the academic and accreditation communities themselves, the answer to the question "What is the problem?" is, most frequently, "Accreditation no longer works."

Accreditation is not broken. It is functioning effectively for thousands of institutions and programs. There is room for improvement, as with any enterprise. A more accurate and precise response to "What is the problem?" is essential if the national conversation is to be productive and useful, especially for students and student learning.

The issue for accreditation is that its longstanding mode of operation is now misaligned with current governmental and public expectations of the role that it should play. If one insists on asking "What is the problem?", the answer is "Misalignment."

Specifically:

- Accreditation's primary accountability has been, historically, to its accredited institutions and programs. This is misaligned with current public expectations that accreditation's primary accountability should be to the public (students, society and government) and that it should play a strong consumer protection role.

- Accreditation standards are often aspirational. They serve as a means of formative evaluation. This is misaligned with current expectations that standards should be explicit and summative in judging academic quality.

- Peer review - professionals judging professionals - is the primary evaluation tool of accreditation. It has a strong track record of assuring and improving quality. Nonetheless, peer review is misaligned with current expectations that the public should play a stronger role in judging academic quality and successful performance of institutions and programs.

- Accreditation is a self-regulatory enterprise. This means that the academic community (1) relies on its own (faculty and administrators) to judge academic quality and (2) provides the resources (financing and personnel) to operate accreditation. This is misaligned with current public distrust of any self-regulatory enterprise and current public sensitivity to conflicts of interest.

In short, accreditation has been carrying out the role and tasks assigned to it over many years. However, expectations of the role are changing. Instead of condemning accreditation as "broken," we need to attend to what accreditation might do to address current expectations tied to serving as a reliable authority on academic quality. This is considered in the next section.

SUGGESTIONS

Suggestion 1

Accreditation stands for and reinforces several key features of the higher education enterprise. These features have been vital to higher education's success over the years. These are the value of peer review, the importance of institutional autonomy and the centrality of academic freedom. All are tied to a central characteristic of the success to date of our colleges and universities: academic leadership from these institutions.

Whatever is done to alter accreditation, we need to preserve the key characteristics of institutional academic leadership, institutional autonomy, peer review and academic freedom. The future success of higher education, both domestically and internationally, depends on respecting these features of the enterprise.

Suggestion 2

At the same time, accreditation needs to change. Its challenge is to preserve the characteristics mentioned above, yet develop capacity to address the current climate of expectations.

"Quality," in today's environment, is about what happens to students. To respond to public interest to know more here, institutions need to be more expansive in the description of their performance. This could be done by each institution, using a small set of indicators describing what happens to students in the aggregate. These may include information about graduation, achievement of other educational goals, lack of achievement of educational goals, successful transfer, entry to graduate school and, where appropriate, job placement.

A second change is about a willingness to accommodate comparisons among institutions with regard to performance. Students and the public can benefit from having the indicators above available such that they can compare institutions. Indeed, the trade-off to retain institutional autonomy and an academic leadership role at the institutional

level may require institutional willingness to provide both more performance information and do so in a manner that allows such comparisons.

A third change involves accrediting organizations taking steps to provide more information about themselves and their decisions: how they operate and, most important, what "accredited status" means. What are the strengths and limitations of an institution or program when it receives accreditation? This need not involve making accreditation reports public, but should involve a summary statement that provides sufficient detail for the public to have some insight into institutional effectiveness. Two things might follow from this change. It can result in a greater commitment to even more rigorous enforcement of standards. And, it provides a basis to explore whether moving to tiered accreditation or stipulation of levels of accreditation is desirable, as some have suggested.

These three changes can address the misalignment concerns described above: calls for greater public accountability, strengthening the role of accreditation standards with regard to evidence of institutional performance and addressing doubts about both peer review and self-regulation.

CAUTIONS

The national conversation includes several other issues involving the structure of accreditation, the role of the federal government in accreditation and student learning outcomes. In each of these areas, the following cautions are offered.

The Structure of Accreditation

Considerable conversation has taken place with regard to whether the regional structure for accreditation in the nonprofit, degree-granting sector continues to be desirable. Questions are asked about whether regional accreditation makes sense in a world in which national and international operation of institutions is commonplace and in which there are growing numbers of student attending two, three or more colleges as part of their educational experience. There is a sense out there that regional accreditation should be national.

As a first caution, we need not restructure current regional accreditation if we are dissatisfied with it. Leave this structure alone. Instead, explore additional accreditation models.

Interest in national structures for accrediting organizations as alternatives to regional accreditation can be addressed through creating new operations for, e.g., the sector accreditation approach that has been discussed or, as Texas is considering, a national outcomes-based accreditation model. The competition would be instructive and likely enrich the overall accreditation enterprise. We might emerge with both regional accreditation and new forms of accreditation in the nonprofit, degree-granting sector.

The Role of the Federal Government

Any conversation among accreditors and institutions around the role of the federal government in accreditation almost always includes three worries. Is the government going to make key structural decisions such as redesign of regional accreditation? Is the

government, through the federal recognition review, to become increasingly involved in the day-to-day operation of accrediting organizations? Is the government taking on the task of making judgments about the accredited status of individual institutions?

A second caution is that the academic and accreditation communities need to remain primarily responsible for decisions about redesign of the structure of the accreditation enterprise, for determining the daily operation of accreditation and, most important, for judgments about accredited status of individual institutions. Historically, the federal government has been an enabler of the accreditation process – in contrast to designing and managing this process and making its judgments. The enabler role is preferable to the more activist approach.

Yes, there is a federal interest here. Within the authority to federally recognize accreditors, the Congress and USDE may wish to stipulate that only accreditors with a national scope may seek federal recognition, thus impacting the structure of accreditation. They may set down general expectations about accreditation operation – thus impacting but not directing daily activity. They should hold accreditors accountable for reliable decisions about accreditation of individual institutions – thus influencing but not making these determinations. And, such federal expectations and actions should be grounded in an acknowledgment that higher education provides the primary leadership to carry out its self-regulatory work.

Student Learning Outcomes

"Student learning outcomes" have been central to the national conversation about accreditation. Yet, neither accreditors nor the federal government can judge the achievement of individual students. This is up to faculty in colleges and universities. Even if national standards were developed for this purpose, how would we monitor the activity of 18 million students moving through thousands of institutions?

A third caution is about how we address this vital issue. Rather than a focus on individual students, we can concentrate on institutional performance and the indicators suggested above. These indicators provide an institutional aggregate picture of what happens to students. This should be sufficient for public accountability purposes, especially if coupled with a commitment to comparisons within groups of similar institutions. And, we continue to leave individual student achievement to the faculty.

SUMMARY

Accreditation is not broken. There is a lack of alignment between current expectations of the role of accreditation and its traditional role. The misalignment may be resolved through actions taken by accreditation organizations and by government.

First, both accreditation and government need to affirm the value of key characteristics of higher education and accreditation such as institutional autonomy, peer review, academic freedom and, above all, institutional academic leadership.

Second, accreditors and institutions can pursue key changes in operation such as agreeing to provide additional information about institutional performance, addressing institutional comparisons and offering more information about accreditation operation and, most important, the reasons associated with decisions about accredited status.

Third, some cautions are in order. The current interest in alternatives to regional accreditation need not involve restructuring the regional approach, but can be pursued by testing other structures such as sector or outcomes-based accreditation models. While the federal government plays a central role in the life of accreditation, this need not result in managing the accreditation process and taking on accreditation's judgment role with regard to academic quality, but needs to be centered on the conditions under which government will provide federal recognition. Both accreditation and government need to acknowledge that individual student learning outcomes are the work of faculty. Accountability for student learning can be realized through institutional performance indicators that provide an aggregate picture of what institutions accomplish with students.

If we treat accreditation not as a broken enterprise, but as an effective process that can and should be reviewed and modified, we strengthen its value to students and society.