Higher Education Accreditation
Concepts and Proposals

Goal: Improve and enhance academic quality and student success at colleges and universities.

Strategy: Redesign and reform accreditation to strengthen the quality of colleges and universities, promote competition and innovation in higher education, and provide accountability to government stakeholders and taxpayers.

General Background on Accreditation:

Accreditation is a non-governmental process established by colleges and universities to evaluate, assure and improve educational quality in American higher education. It is a peer-review process designed to recognize and validate that an institution or program within an institution (e.g. nursing or business) meets a set of established standards and fosters a commitment to continued excellence.

To become accredited, colleges and universities, as well as specific academic programs, apply to join private membership associations known as accrediting agencies. These agencies, in coordination with their member institutions or programs, develop standards and criteria around what constitutes "quality" higher learning.

Pathways for institutions or programs seeking or reaffirming accreditation generally begin with institutions or programs completing a self-study report which consists of an internal review and examination of the organization's mission, educational objectives and performance with respect to the standards established by the accrediting body. Peer-reviewers – faculty and administrative colleagues from other colleges and universities – examine and evaluate the college, university or academic program against the agency's standards and make recommendations regarding the award of accredited status.

This review process may occur as frequently as every few years or as infrequently as every 10 years.

What is the Purpose and Role of Accreditation?

Accreditation of colleges and universities generally serves two purposes:

1. Institutional Purpose: Colleges and universities assert that accreditation helps shape and guide the continuous quality improvement of their institutions and academic programs. Accreditation's unique, external peer-review process provides insight, feedback and recommendations on goals, policies and plans to fulfill educational missions and enhance academic quality. Accreditation can also help institutions make judgments about accepting academic credit from other colleges or universities.

2. Federal Government/Public Purpose: The federal government and the public rely on accreditation for quality assurance. As the federal government created new federal benefit programs, in the form of grants and loans, for veterans and college students pursuing higher education, it sought a mechanism or system to assure the quality of institutions where students were spending their federal funds. To accomplish this objective, the federal government deferred to an existing system – accreditation – to delegate the role of quality assurance and ensure that students were only using their federal funds at credible, legitimate and quality institutions.

The Korean War G.I. Bill of 1952 first established the formal relationship between accreditation and the federal government. It specified that veterans could only use their veteran education benefits at colleges and universities that were accredited by a federally recognized accreditor.

This same premise was reinforced in the Higher Education Act of 1965. Institutional eligibility for federal student aid programs such as grants and loans required colleges and universities to be accredited by an accrediting agency recognized by the Secretary of Education. Recognition meant that accreditors were determined to be a "reliable authority as to the quality of education or training offered" by the institutions of higher education or programs they accredit.[1]

Federal law was generally silent, though, on what was needed to achieve this recognition. It wasn't until the 1992 Higher Education Act Amendments that Congress defined in law the standards accreditors needed when assessing quality at institutions of higher education. Today, current law outlines 10 minimum standards: student achievement; curriculum; faculty; facilities; fiscal and administrative capacity; student support services; recruiting and admissions practices; measure of program length; student complaints; and compliance with Title IV program responsibility.

Problems That Need to be Addressed:

Accreditation serves dual roles as both a "gatekeeper" to federal funds and as a process for institutional improvement. The question for some is whether accreditation has two incompatible masters in universities and government.[2] For universities, the purpose of accreditation has been

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[1] 20 U.S.C. § 1099b.
[2] A. Lee Fritschler, "Accreditation's Dilemma: Serving Two Masters—Universities and Governments," Council for Higher Education Accreditation, September 22, 2008, http://www.chea.org/About/NAF/Fritschler.pdf.

self-improvement. For the federal government, accreditation has served as quality control for its sizeable investment in higher education – in fiscal year 2015, the federal government plans to spend over $138 billion in federal financial aid to help students attend approximately 6,000 colleges and universities.[3]

Today, many policymakers are asking serious questions about the effectiveness of accreditation's gatekeeping and quality assurance role as families, students and taxpayers across the country raise concerns about the cost, quality and value of American higher education.

As a result, the following issues are emerging as potential areas for debate in the upcoming reauthorization of the Higher Education Act:

A. Accreditation Has Not Always Produced or Improved Educational Quality

While many observers of higher education remark that the United States has the best colleges and universities in the world, that status is being put at risk by startling examples of deficiencies in collegiate instruction, academic rigor, and student success.

The design of judgments and assessments of student learning and quality at nearly 6,000 diverse colleges and universities varies tremendously, making the results difficult to compare across institutions. For example, an assessment of student achievement and learning at St. John's College, where curriculum is based on the Great Books program, would be unsuitable for Nashville's auto diesel college.

Nonetheless, the following snapshots from various assessment instruments provide a glimpse into how some students are faring at colleges and universities today:

- Student Learning: According to research from Josipa Roksa and Richard Arum, Professors at University of Virginia and New York University, students have made few, if any, gains in critical thinking, analytic reasoning, and other skills taught in college:
  - 45% of students did not demonstrate any significant improvement in learning during the **first two years** of college; and
  - 36% of students did not demonstrate any significant improvement in learning **over four years** of college.[4]

- Academic Rigor: According to Professor Roksa and Arum's review of student surveys on institutional curriculum, colleges lack rigor and engagement:
  - 32% of students each semester did not take any courses with more than 40 pages of reading assigned a week; and
  - Half of students didn't take a single course in which they were required to write more than 20 pages over the course of a semester.[5]

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[3] U.S. Department of Education, "Student Aid Overview: FY2016 Budget Request," U.S. Department of Education, 2015: O-7, http://www2.ed.gov/about/overview/budget/budget16/justifications/o-sao.pdf.

[4] Richard Arum and Josipa Roksa, *Academically Adrift: Limited Learning on College Campuses* (Chicago: University of Chicago Press, 2011).

[5] Ibid.

- Student Engagement: According to results from the Faculty Survey of Student Engagement (FSSE), students study almost half the amount that faculty expect they should:
    - Results suggest faculty expect students to study about 6 hours per week for a single class, but students report only studying a little less than 4 hours per week per class. [6]

- Basic Skills: According to research from the American Institutes for Research (AIR), many college graduates leave school without basic skills:
    - 20% of U.S. college students completing 4-year degrees, and 30% of students earning 2-year degrees, have only basic quantitative literacy skills, "meaning they are unable to estimate if their car has enough gasoline to get to the next gas station or calculate the total cost of ordering office supplies."[7]

- Student Attainment and Achievement: According to the Organisation for Economic Cooperation and Development (OECD), the United States ranks just 12th in the world (out of 37 countries) when it comes to our share of the population (ages 25 – 34) with college degrees.[8]

- Workforce Skills: Although 96% of chief academic officers at U.S. higher education institutions believe their institution "is very or somewhat effective at preparing students" for the workforce, only one-third of American business leaders agree that these institutions are graduating students with the skills and competencies their businesses need.[9] Nearly a third of business leaders disagree, with 17% going as far as to say that they strongly disagree.[10] Additionally, concerns are not limited to students' lack of applicable knowledge and skills in their respective career fields – over a quarter of employers (26.2%) report that new workforce entrants with a four-year college degree are "deficient" in writing, a basic skill.[11]

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[6] Faculty Survey of Student Engagement, "FSSE and NSSE Results: Comparing faculty and student expectations for time spent preparing for class," Indiana University School of Education Center for Postsecondary Research, 2014, http://fsse.iub.edu/html/expectations2011.cfm.

[7] Justin D. Baer, Andrea L. Cook, and Stephane Baldi,"The Literacy of America's College Students," American Institutes for Research, January 1, 2006, http://www.air.org/resource/literacy-americas-college-students.

[8] Organisation for Economic Co-operation and Development, "Education at a Glance 2013: United States," OECD, http://www.oecd.org/edu/United%20States%20_EAG2013%20Country%20Note.pdf.

[9] Gallup, Scott Jaschik, and Doug Lederman, "The 2014 Inside Higher Ed Survey of College & University Chief Academic Officers," Inside Higher Ed and Gallup, January 23, 2014, https://www.insidehighered.com/news/survey/pressure-provosts-2014-survey-chief-academic-officers.

[10] Preety Sidhu and Valerie J. Calderon, "Many Business Leaders Doubt U.S. Colleges Prepare Students," Gallup, February 26, 2014, http://www.gallup.com/poll/167630/business-leaders-doubt-colleges-prepare-students.aspx.

[11] The Conference Board, Corporate Voices for Working Families, the Partnership for 21st Century Skills, and the Society for Human Resource Management, "Are They Really Ready to Work? Employers' Perspectives on the Basic Knowledge and Applied Skills of New Entrants to the 21st Century U.S. Workforce," Partnership for 21st Century Skills, September 29, 2006, http://www.p21.org/storage/documents/FINAL_REPORT_PDF09-29-06.pdf.

According to the Council for Higher Education Accreditation, "accreditation is a highly successful and well-tested system of quality assurance and academic quality improvement."[12] Yet some of these snapshots of student performance and quality were captured at our nation's *accredited* colleges and universities.

Our higher education system should be preparing students for better jobs and a better life, and its success will determine whether our nation's workforce is able to compete in a global and knowledge economy.

B. Accreditation Can Inhibit Innovation and Competition

Critics often assail accreditation's structure and design as anti-competitive and resistant to change. They charge that the system restricts innovative and new providers of higher education from entering the marketplace, continually protects and favors market incumbents with high barriers to entry, and reinforces existing and often expensive delivery models. Senator Marco Rubio (R-FL) summed it up as follows: "we have a broken accreditation system that favors established institutions while blocking out new, innovative and more affordable competitors."[13]

New Providers of Higher Education

In recent years there has been an emerging interest in so-called "non-college providers of higher education." These organizations teach or train students, but don't often look or feel like traditional colleges and universities. They make up a new category of knowledge providers and can take many shapes and sizes.

Organizations like General Assembly prepare students for jobs in software coding, product design and other technology fields in as little as 10 weeks with industry practitioners as faculty. Massively Open Online Courses (MOOCs) are free, online courses that can be delivered by professors from elite institutions to community colleges and are hosted by technology companies such as Coursera and non-profits like edX. Some organizations such as Mozilla Foundation are developing open-source "digital badges" that allow more types of organizations to identify and recognize an individual's subject matter mastery and competency. Operations like StraighterLine provide online courses, but not degrees, for a monthly subscription fee of $99 plus $49 per course.

While these new entrants to higher education may offer students low-cost and high quality learning options, they generally don't fit the mold of traditional accreditation. They aren't aligned with the current accreditation regime's requirements of tenured faculties, award of formal degrees or certificates, campus facilities or typical governance structures. Unfettered by traditional accreditation's tendency to force standardization and uniformity in delivery models,

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[12] Council for Higher Education Accreditation, "Accreditation, Students and Society," Council for Higher Education Accreditation, June 2013, http://www.chea.org/public_info/Accreditation%20Students%20and%20Society%20June%202013.pdf.
[13] "Rubio Proposes Ideas for Higher Education Reform at Miami-Dade College," Official website of Senator Marco Rubio, February 10, 2014, http://www.rubio.senate.gov/public/index.cfm/press-releases?ID=a24acd97-025e-4ed7-9672-7a84eb76606b.

these organizations' cost structure and pricing may be significantly lower. Their educational offerings often aren't able to fit into institutions' programs of study and acceptance for credit by traditional higher education has not always been met with success. These providers don't offer degrees and are unable to accept students using Title IV federal student aid.

Yet arguably some of these organizations operating outside of traditional higher education offer high-quality instruction and education at a lower cost to students, achieve superior student outcomes, and can provide better economic payoffs and returns than a typical college investment. They challenge conventional notions of "college" and could represent a competitive threat to traditional higher education. Higher education entrepreneur Burck Smith raises this point: "You don't need to be a college to offer a college course online. If a provider can meet the standards for a college course, shouldn't that provider be able to offer it under the same conditions as a college?"[14]

A reformed accreditation structure and/or Title IV eligibility mechanism that accounts for the scope of these affordable, student-centered and nontraditional providers may play a key role in advancing higher education into the 21st century.

Historic Accreditation Design and Structure

Accreditation's historic design may be impeding innovation and competition for stronger educational standards and new quality assurance models.

Regional accrediting agencies are divided into 6 geographic regions across the United States and territories. Institutions seeking regional accreditation must apply to the accrediting agency where a majority of their educational offerings and services are provided. For example, 4-year colleges and universities located in California seeking regional accreditation must apply to the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges, while colleges in Florida must seek recognition from the Southern Association of Colleges and Schools' Commission on Colleges.

Given accreditation's more than 100-year-old history, this structure may have worked well when peer-review travel was time-consuming and costly, and colleges and universities largely served students from surrounding communities.[15] Yet higher education in the 21st century is no longer constrained by geographic boundaries. It is increasingly national in scope and reach. Nontraditional and innovative higher education organizations now offer purely distance education, operate multiple campuses across regional boundaries and state lines, or utilize hybrid "bricks and clicks" delivery models to reach students nationwide. Geographic models of quality assurance may not work well for these organizations. In fact, some organizations have been forced to change regional accreditors based on operational decisions, such as where to house

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[14] House Committee on Education and the Workforce, "*Keeping College Within Reach: Improving Higher Education Through Innovation*," 113th Cong., 1st sess., July 9, 2013, testimony of Burck Smith, CEO and founder of StraighterLine, http://edworkforce.house.gov/uploadedfiles/smith_testimony_final.pdf.

[15] Shirley M. Tilghman, "The Uses and Misuses of Accreditation," Presentation at the Reinvention Center Conference, November 9, 2012, Princeton University, http://www.princeton.edu/president/tilghman/speeches/20121109/.

administrative and leadership staff—not because of any change in the location of students served or other quality concerns.[16]

Moreover, regional accreditation's reliance on geography does not distinguish between institutions of tremendous diversity. For example, the Higher Learning Commission of the North Central Association accredits nearly 1,000 institutions in 19 different states from Arizona to Ohio. These institutions range from Santa Fe Community College in New Mexico to Carleton College in Minnesota to the University of Missouri system. Each institution has its own educational mission, admissions selectivity, level of state support, size, governance, and differing community needs and culture. Today's quality assurance system does not generally account for this diversity when reviewing institutions; rather it relies simply on a college or university's physical footprint.

Putting these diverse institutions under one tent may lead to development of diluted or generic accreditation standards, policies, and procedures for quality review. There may be opportunities for standards to be raised, strengthened or aligned if accreditation design is centered on other principles, such as institutional mission or type, rather than geography.

C. Federal Recognition of Accreditation Can Be Political and Bureaucratic

Accrediting agencies seeking initial and continued recognition by the U.S. Secretary of Education sometimes face a review process that can be plagued by both politics and bureaucracy.

Accreditors seeking official recognition by the U.S. Department of Education must appear before the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at least every 5 years. The primary functions of the NACIQI are to advise the Secretary of Education on accreditation, provide recommendations to the Secretary concerning the acceptance of the standards adopted by the accrediting agencies and whether the agencies should be recognized as a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits.

The NACIQI is composed of 18 members, each serving a six-year term, whose backgrounds and expertise must include experience and knowledge of accreditation and higher education administration or governance. The Secretary, the Senate and the House of Representatives each appoint 6 members, and Congressional appointees are evenly chosen between the minority and majority parties.

While the composition and selection of membership of the NACIQI was altered in the 2008 reauthorization of the Higher Education Act (previously, the Secretary appointed all members), concerns remain about the independence and autonomy of the NACIQI from the Department of Education and elected officials.

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[16] Eric Kelderman, "2 For-Profit Education Companies Seek to Move West for Accreditation," *The Chronicle of Higher Education*, September 23, 2010, http://chronicle.com/article/2-For-Profit-Education/124590/.

The NACIQI's role can be vulnerable to Administration attempts – regardless of political party – to promote a policy agenda, such as altering recognition criteria in student achievement or learning outcomes without Congressional approval. According to some longtime observers of the recognition process, politics, not substantive policy or the advice/recommendations of the NACIQI, drives Department of Education actions. Accreditors also face inconsistent and uneven application of regulations and agency recognition criteria by Department of Education staff. [17]

Many accreditors say that they find the recognition process increasingly granular, narrowly focused on compliance, and overly burdensome. Agency petitions for federal recognition can often surpass more than 200 pages, not including supplemental exhibits. At a recent meeting of the NACIQI, Department of Education staff found the Western Association of Schools and Colleges, Senior College and University Commission to be noncompliant with no less than 29 different regulatory citations of varying levels of importance.[18]

Finally, the NACIQI's effectiveness can be diminished when committee members have little input and say over an accrediting agency's recognition review or rely too heavily and without question on Department of Education accreditation staff reports. This may renew a discussion about the role, purpose and deference given to the NACIQI in recognition decisions.

D. Accreditation Can Be Costly, Burdensome and Inefficient

According to some college and university leaders, accreditation is a costly, burdensome and sometimes overly-bureaucratic endeavor with little or marginal benefits provided to the institution or program.[19]

Accreditation reviews often require the production of reams of paperwork and documentation by colleges and universities to present evidence of meeting accreditation standards, including demonstrating compliance with federal regulations. Public comments to the draft Accreditation Policy Recommendations for the reauthorization of the Higher Education Act from the National Advisory Committee on Institutional Quality and Integrity (NACIQI) provide specific examples of the quantified impact:

- According to the Association of American Universities' informal surveys of its institutions, accreditation reviews over the last decade have become increasingly time-consuming and expensive for senior administrators and staff, with costs for single institutions in some cases running over $1 million.[20]

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[17] Doug Lederman, "Can You Say NACIQI?" *Inside Higher Ed*, December 5, 2006, https://www.insidehighered.com/news/2006/12/05/naciqi.

[18] Jamienne Studley, "Report of the Meeting: National Advisory Committee on Institutional Quality and Integrity, December 11-12, 2012," U.S. Department of Education, http://www2.ed.gov/about/bdscomm/list/naciqi-dir/2012-fall/f2012report.pdf.

[19] Council for Higher Education Accreditation, "Presidential Perspectives on Accreditation: A Report of the CHEA Presidents Project," Council for Higher Education Accreditation, 2006, http://www.chea.org/pdf/CHEAMonograph_Apr06.pdf.

[20] Association of American Universities, Comments to the NACIQI discussion draft, Higher Education Accreditation Reauthorization Policy Considerations, U.S. Department of Education, http://www2.ed.gov/about/bdscomm/list/naciqi-dir/reauthorization/flounlacker-hea.pdf.

- Vanderbilt University estimates that its College of Art and Sciences devotes 5,000+ hours to accreditation-related work annually and that its School of Engineering devotes 6,250-8,000 hours of work to such efforts annually; these are baseline workloads, and Vanderbilt notes that they are even higher in years when reports are due.[21]

- Duke University reports that it incurred roughly $1.5 million in costs, mostly for faculty and staff time, in the last two years of its most recent decennial review. In addition, Duke now spends more than $500,000 annually to comply with accreditor's ongoing demands pertaining to academic assessment and related matters.[22]

In addition to institutional accreditation by a regional or national accrediting agency, many institutions offer academic programs with specialized or programmatic accreditations. These specialized accrediting agencies range from the Council of the Section of Legal Education and Admissions to the Bar of the American Bar Association, which accredits law degree programs, to the Council on Education of the American Veterinary Medical Association, which accredits veterinary medicine degree programs.

The data collection from each of these accreditors (specialized and institutional) may add undue burden on institutions with each accreditor requesting different volumes and types of data. A survey commissioned by the Council for Higher Education Accreditation found that very few common data elements are required by all accreditors.[23]

The information that accreditors require of institutions may also be outdated, unnecessary and unrelated to student success and institutional quality. Accreditation reviews of colleges and universities still rely heavily on inputs, process and capacity. Components such as classroom facilities, faculty salaries and degrees, institutional finances and other non-educational related inputs are regularly mentioned during accreditation reviews. For example, a recent peer-review report recommended that the institution under review give greater "attention to the capacity of the library, in terms of personnel, collections, and facilities."[24]

There has been considerable debate on how accreditors arrive at their quality determinations. In a recent policy brief, Sylvia Manning, the former president of the Higher Learning Commission, argues that accreditation "undeniably and unapologetically looks at inputs" and is "a bet that, based on current evidence, the institution will continue to offer an acceptable level of quality in the education it provides."[25] Others such as George Leef and Roxana Burris, writing for the American Council of Trustees and Alumni, maintain that "accreditation only shows that the

[21] Christopher L. Eisgruber, *Christopher Eisgruber to Susan D. Phillips*, May 26, 2011, Letter, U.S. Department of Education, http://www2.ed.gov/about/bdscomm/list/naciqi-dir/2011-spring/naciqi-6-2011-comments.pdf.
[22] Ibid.
[23] Council for Higher Education Accreditation, "The Common Data Project," Council for Higher Education Accreditation, August 2000, http://www.chea.org/pdf/CommonData_Aug2000.pdf.
[24] "Team Review Report 2012," WASC Senior College and University Commission, October 1, 2014, http://www.wascsenior.org/institutions/university-san-diego.
[25] Sylvia Mann, "Launching New Institutions: Solving the Chicken-Or-Egg Problem in American Higher Education," American Enterprise Institute, October 2014, http://www.aei.org/wp-content/uploads/2014/10/Launching-New-Institutions-3.pdf.

school is following what the accreditors think is the proper formula for a successful institution, not that it is in fact a successful institution."[26]

Federal regulations require accrediting agencies to review their standards on a regular basis and more of this may be warranted in an era when consumers and stakeholders increasingly value evidence and performance, rather than trust-based affirmations and judgment calls. The standards revision discussion currently underway at the Commission on Institutions of Higher Education at the New England Association of Schools and Colleges is an encouraging sign that accreditors are willing to reposition themselves to, among other things, "emphasize outcomes increasingly, much more than inputs, especially student learning [and] increase the expectation for accountability."[27]

Options for Reforming Accreditation:

Over the past decade, the U.S. Congress, the U.S. Department of Education, and other federal actors have all signaled a certain level of dissatisfaction with accreditation and raised serious concerns about its ability to perform quality assurance. More direct federal involvement was most always seen as the answer to these concerns.

This was evident in the Higher Education Act Amendments of 1992, which defined in law the areas accreditors needed to examine when determining institutional quality. The 10 standards by which the federal government would judge accrediting agencies soon became 28 pages of regulation with 88 pages of sub-regulatory guidance and 93 specific criteria for recognition.

In 2006, Former U.S. Secretary of Education Margaret Spellings' Commission on the Future of Higher Education brought further attention and scrutiny to accreditation. More federal control over accreditation, including potential requirements about standardization of student learning outcomes and assessment, was the prescription for college and universities' shortcomings.

U.S. Department of Education regulations from 2010 defined an academic credit hour, historically within the purview of faculty, and made accreditors responsible for enforcement. A series of high-profile Senate hearings on for-profit colleges and universities called into question accrediting agencies' continued recognition of some of these institutions. Recently introduced legislation – the College Affordability and Innovation Act – would create a Commission on Higher Education Accountability Standards tasked with setting appropriate minimum performance standards for colleges and universities.[28] This directly calls into question

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[26] George C. Leef and Roxana D. Burris," "Can College Accreditation Live Up to Its Promise?" American Council of Trustees and Alumni, July 2002, http://www.goacta.org/images/download/can_accreditation_live_up_to_its_promise.pdf.
[27] The Commission on Institutions of Higher Education of the New England Association of Schools and Colleges (CIHE of NEASC), "Standards Revision Discussion Paper: 2015," CIHE of NEASC, https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/Standards_Revision_Process/StandardsRevisionDiscussionPaperJanuary2015.pdf.
[28] College Affordability and Innovation Act, S. 1969, 113th Cong., 2nd sess., http://lis.gov/cgi-lis/query/z?c113:S.1969:

accreditation's primary role in self-regulation and peer-reviewers determining appropriate academic standards.

Increased federal involvement is one possible way to address accreditation's deficiencies. Pursuing this option though may change the distinguishing features of American higher education – diversity, excellence, and institutional autonomy. However, there may be opportunities to effectively maintain accreditation's desire to remain the primary arbiters of quality through peer-review, while at the same time satisfy the public's expectations for accountability.

Accreditation is, at its core, an effort by colleges and universities to self-regulate. As the landscape of higher education evolves – from the students served, to the providers that deliver education, to the expectations of consumers – so too must accreditation.

The following proposals are options for consideration in the upcoming reauthorization of the Higher Education Act to redefine accreditation's role, modernize our quality assurance system for 21st century learning, and provide accountability and reassurance to governments and the greater public.

Refocus Accreditation on Quality

Proposal #1: Repeal Accreditation-Related Regulations and Statute that are Unrelated to Direct Institutional Quality and Improvement

Today, the federal government's involvement in accreditation has morphed from 10 pages of law to 28 pages of regulation to nearly 88 pages of sub-regulatory guidance which includes nearly 93 different criteria that accreditors must consider when determining institutional quality. For example, federal regulations and criteria require myriad elements that accreditors must review – many of which are unrelated to direct academic quality and perhaps beyond the scope of accrediting agency expertise – including if institutions have:

- Written plans to maintain and upgrade facilities, equipment and supplies;
- Facilities and equipment that meet state and local safety and fire codes;
- Procedures in place to ensure students who register in distance or correspondence courses are the same individuals who participate, complete, and receive academic credit; and
- Evidence of compliance with Title IV responsibilities, whether any material weaknesses have been documented, and if so, whether plans have been developed to address deficiencies.

Some observers of accreditation remark that accreditation's role in quality assurance has shifted from a focus on quality to a compliance role in performing duties for which it is not well suited.[29] Federal regulations on accreditation can also be duplicative of requirements for states and the federal government, particularly references to Title IV eligibility compliance.

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[29] American Council on Education, "Assuring Academic Quality in the 21st Century: Self-Regulation in a New Era," American Council on Education, 2012, http://www.acenet.edu/news-room/Documents/Accreditation-TaskForce-revised-070512.pdf.

Under current law, accreditors are required to have standards on fiscal and administrative capacity. Accreditors often appoint individuals to their boards with significant accounting and financial expertise to help them assess an institution's financial health. The Department of Education also has its own requirements around financial responsibilities of institutions. These regulations are known as the financial responsibility ratios and are intended to ensure the financial integrity and health of colleges and universities participating in Title IV student aid programs.

Overlapping roles and responsibilities among the actors that make up our "triad" system of higher education governance – federal government, states and accreditors – may not result in optimal oversight and coordination. This warrants a conversation about who's on the "flagpole" for completing the task and what is each entity's responsibility.

Freeing accreditation's responsibilities from the federal government's burdensome, misguided and duplicative regulations may restore the true focus and capacity of accreditation back to quality and quality improvement of institutions. Department of Education recognition processes may also then be refocused and streamlined to address more critical criteria such as student learning and achievement.

Proposal #2: Permit Flexibility and Nuance in Accreditation Reviews

According to some observers of accreditation, federal regulation and criteria may have the effect of requiring accreditors to hold every institution accountable with respect to every detail of an accreditation standard.[30] The consequence of this interpretation may mean that the same detailed review is required of all colleges and universities even if the institution has historically had few issues or weaknesses compared to those institutions with a history of struggling performance.

Providing explicit authority to accreditors to establish "risk-adjusted" or differentiated reviews may allow and give confidence to accreditors to greater focus their attention on institutions that truly need the most assistance, while at the same time offer expedited reviews to colleges and universities with superior track records. Institutions should not be given a "free pass," but differentiated reviews, if developed thoughtfully, should be equally as reliable and uphold accreditation's serious responsibilities in quality assurance.

Proposal #3: Encourage Gradation, Distinction and Clarity in Accreditation Status and Reviews

Decisions about whether to grant accreditation status to a college or program are the result of a binary "pass-fail" decision: either an institution or program does or does not receive accreditation. Some have argued that this setup actually establishes a "floor" of minimum standards for achieving accreditation. Given a lack of distinction or gradation, accreditation standards may not be seen as aspirational, but rather simply the bare minimum needed to achieve recognition.[31]

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[30] Ibid.
[31] Senate Committee on Health, Education, Labor and Pensions, "*Accreditation as Quality Assurance: Meeting the Needs of 21st Century Learning: Hearing before the Committee on Health, Education, Labor, and Pensions,*" 112th

Accreditation matters to the public and sends signals of trust and confidence. Students, families, policymakers, and other interested stakeholders may be unable to discern meaningful information from these blanket accreditation statuses. Even at comparable colleges and universities, quality may vary dramatically, yet all institutions receive the same "accredited" stamp of approval.

Distinctions and gradations within accreditation could include variations such as: accredited and meets standards; accredited with distinction; or accredited and greatly exceeds standards. Providing these additional information layers may not only improve consumer information and college enrollment decisions, but it has the potential to incentivize colleges and universities to strive for increased performance and quality.

Additionally, voluntary actions by some accrediting agencies to publish team review reports and other accreditation decision letters may help instill stakeholder confidence in how accreditors arrive at quality determinations.

Proposal #4: Delink Accreditation from Institutional Eligibility for Federal Student Aid

Many believe that accreditation's gatekeeping role in sorting out which colleges will be eligible to receive federal student aid has distorted accreditation's original purpose and created perverse and powerful incentives.

Accreditation is simply no longer a voluntary undertaking for most colleges and universities. It has become a near universal requirement for colleges and universities as access to federal student aid keeps these institutions' doors open. However, before the advent of federal financial aid programs, colleges and universities sought accreditation as a badge of distinction and honor. This seal of approval acted as an important signaling device to consumers and stakeholders.[32]

But according to a catalog of accreditation decisions, fewer than 10 institutions lost regional accreditation in calendar year 2013.[33] Said another way, it may be difficult to attain regional accreditation, but once you are a member of the club, it's just as hard to leave. And despite accreditation's purpose to help institutions improve, often by requiring corrective actions, concerns remain about accreditors' willingness to be bold with substandard institutions. After nearly 30 years of a checkered past of on- and off-probation statuses, Southeastern University finally lost its accreditation in 2009.[34] Rarely do accreditors withdraw accreditation on the basis

Cong., 2nd sess., December 12, 2013, testimony of Art Levine, president of the Woodrow Wilson National Fellowship Foundation, http://www.help.senate.gov/imo/media/doc/Levine.pdf.

[32] George C. Leef and Roxana D. Burris, "Can College Accreditation Live Up to Its Promise?" *American Council of Trustees and Alumni,* http://www.goacta.org/images/download/can_accreditation_live_up_to_its_promise.pdf.

[33] "Accreditation Actions: CHEA- and USDE-Recognized Accrediting Organizations," CHEA Almanac Online, June 30, 2014, http://www.chea.org/Almanac%20Online/index.asp.

[34] Kevin Carey, "Asleep at the Seal: Just how bad does a college have to be to lose accreditation?" *Washington Monthly*, March/April 2010, http://www.washingtonmonthly.com/features/2010/1003.carey.html.

of educational deficiencies and quality; more often than not, financial concerns are the cause of most sanctions as evidenced by a recent Government Accountability Office (GAO) report.[35]

This begs the question of whether student achievement and learning takes primacy and centrality in accreditation reviews. According to a review of 37 accrediting agencies and their standards, researchers at the Institute for Higher Education Policy found that just 18 of 47 accreditor standards "made any attempt to deal directly with student learning outcomes."[36] Ultimately, with billions of federal student aid on the table, serious questions continue to linger about the ability and integrity of colleges and universities to self-regulate and self-police.

Moreover, accreditation's gatekeeping role has given accreditor's authority and leverage to be overly prescriptive, intrusive, and sometimes usurp institutional autonomy. Colleges and universities, which rely on students using Title IV student aid, all too often have a "gun to the head" and must acquiesce to accreditor's demands to retain their accredited statuses. These demands can range from bureaucratic meddling to interfering with important governance issues. Accreditors have also been known to make conclusions about proper diversity statistics, institutional decisions about curriculum and campus polices on social life and student organizations. Former Dartmouth President Jim Yong Kim eloquently noted that "accreditation staff often substitute their own judgment for that of an institution's trustees and administrators."[37]

A growing chorus of critics believe that the only solution is to end the powerful gatekeeping relationship between federal financial aid and accreditation. Doing so would return accreditation to its historical roots as private, peer-review organizations focused on institutional improvement, not agents of federal government enforcement and intrusion.

Redesign Accreditation to Promote Competition and Innovation

Proposal #1: Establish New Pathways to Accreditation and/or Title IV Eligibility for Non-College Providers of Higher Education

Injecting greater competition in higher education by breaking down regulatory and accrediting agency barriers to entry has the potential to challenge the higher education status quo, drive costs down and stimulate new delivery models of education. For example, last Congress Senator Mike Lee (R-UT) introduced a proposal to allow states to set up their own alternative accrediting systems and decouple Title IV eligibility from enrollment at degree-issuing institutions. It would allow businesses, trade associations, labor unions, or any other knowledge provider the

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[35] "Report to the Ranking Member, Committee on Education and the Workforce, House of Representatives: Education Should Strengthen Oversight of Schools and Accreditors," U.S. Government Accountability Office, December 2014, http://www.gao.gov/assets/670/667690.pdf.

[36] Clifford Adelman, "Avoiding the Issue: the Extent, Means, and Language of Student Learning Outcome Criteria in Accreditation Standards," Institute for Higher Education Policy, May 2014, http://www2.ed.gov/about/bdscomm/list/naciqi-dir/policy-initiatives-2014.pdf

[37] National Advisory Committee on Institutional Quality and Integrity, "Higher Education Act Reauthorization: Accreditation Policy Recommendations." U.S. Department of Education, April 2012, https://www2.ed.gov/about/bdscomm/list/naciqi-dir/2012-spring/teleconference-2012/naciqi-final-report.pdf.

opportunity to provide an accredited educational offering, with the ultimate goal of making "more kinds of students and more kinds of education eligible."[38]

State-based agencies are one approach to establishing new pathways to Title IV eligibility for nontraditional education but there may be other types of alternative quality assurance models. While questions remain about "what" should be examined – individual courses or alternatively, a focus on just the provider itself – selecting the entity to undertake the challenge is a first step.

Potential Quality Review Models for Non-Traditional Providers:

1) Utilize current accreditation infrastructure: Authorize willing regional, national, or specialized accrediting agencies to recognize and sanction quality in nontraditional providers of higher education;

2) Utilize states: Authorize states to enter into agreements with the Secretary of Education to develop accrediting agencies for the purposes of recognizing quality in nontraditional providers of higher education[39]; or

3) Establish a new accreditor: Authorize grant funds to support initial development of new, non-governmental accrediting agencies that would focus on approving innovative educational providers. These entities may have a set of broad recognition guidelines to reflect the diversity and uniqueness of knowledge providers and could eventually seek recognition from the Department of Education for federal student aid eligibility.

Traditional colleges and universities may find the process and recognition requirements of these alternative quality assurance models appealing. The recognition scope of these alternative quality assurance models potentially could be expanded to provide options for all providers of higher education, whether they are traditional institutions or more recent "non-college" providers of higher education.

Proposal #2: Eliminate the Geographic-Based Structure of Regional Accrediting Agencies

Removing the geographic jurisdiction from regional accrediting agencies has the potential to inject market forces in an otherwise non-competitive activity. Regional accrediting agencies would no longer be given a guaranteed customer base and a college's physical location would no longer determine its accreditor. For example, colleges in Maine would not be bound to the regional monopoly of the Commission on Institutions of Higher Education of the New England Association of Schools and Colleges. Bowdoin College could be free to seek recognition from the Middle States Association of Colleges and Universities or the Northwest Accreditation Commission.

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[38] "Lee Introduces Bill to Expand Higher Education Opportunities," Official website of Senator Mike Lee, January 9, 2014, http://www.lee.senate.gov/public/index.cfm/2014/1/lee-introduces-bill-to-expand-higher-education-opportunities.
[39] Ibid.

Regional accrediting agencies would for the first time be subject to competition if colleges and universities had choices and options. Competition for membership has the potential to incentivize accreditors to raise quality standards and clearly differentiate themselves in the marketplace between those that hold high quality at a premium and those that may not. Arguing against the view that a free market in accreditation would cause a "race to the bottom" for educational standards, former Boston University president Jon Westling states:

"If [accrediting agencies] have anything worthwhile to offer colleges and universities, colleges and universities will pay them for it. Generally, colleges and universities will pay to be reviewed by the agency which has the strictest standards that the institution thinks it can pass. A free market in accreditation agencies will quickly stratify, with the toughest agencies attracting the best colleges and universities. "[40]

As a result of breaking up the regional monopolies, colleges and universities would also be free to organize accreditation around preferred characteristics, such as institutional type, size, mission, or selectivity. The Carnegie Classification of Institutions of Higher Education produced by the Carnegie Foundation for the Advancement of Teaching is a helpful guide in visualizing the various possibilities for accreditation redesign.

Options for Non-Geographic Structures of Accreditation Design Based On:

1. Basic Institutional Classification:

   1. Doctorate-Granting Universities
   2. Master's College and Universities
   3. Baccalaureate Colleges
   4. Associates Colleges
   5. Special Focus Colleges (must have at least 80% of undergraduate and graduate degrees in discipline, e.g. schools of music, Bible schools, or schools of art)
   6. Tribal Colleges

2. Selectivity:

   1. Inclusive – Students with a 25th percentile ACT-equivalent score below 18.
   2. Selective – Students with a 25th percentile ACT-equivalent score from 18 to 21.
   3. More Selective – Students with a 25th percentile ACT-equivalent score greater than 21.

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[40] George C. Leef and Roxana D. Burris," "Can College Accreditation Live Up to Its Promise?" American Council of Trustees and Alumni, July 2002, http://www.goacta.org/images/download/can_accreditation_live_up_to_its_promise.pdf.

3. Dissolve the current regional boundaries and let institutions choose the accreditor of their choice thereby making all current regional accreditors national in scope.

Keep Recognition of Accrediting Agencies Independent and Free from Politics

The Secretary's decision to recognize an accrediting agency must remain objective, fair and guided by law, rather than politically motived desires.

Proposal: Ensure the NACIQI's Independence

1) Limit any expansion of the Secretary of Education's authority in making policy-related recognition decisions outside of current law.

2) Authorize the NACIQI to hire its own accreditation staff, independent of the Department of Education accreditation staff, to assist in preparation of agency recognition recommendations.