April 17, 2015

**Analysis of Higher Education Accreditation Concepts and Proposals**

Submitted By:
John C. Cavanaugh, PhD.
President & CEO
Consortium of Universities of the Washington Metropolitan Area

The paper provides a good synopsis of the current state of commentary regarding accreditation. The analysis pertains nearly exclusively to institutional accreditation by the seven institutional accreditors, not to other accrediting organizations (e.g., specialized national accreditors, program accreditors, athletics accreditors, etc.). From the outset, it clearly states the dilemma of institutional accreditors serving two distinct functions as mandated by Congress: as a “gatekeeper” to access to federal financial aid, and as an assurer of institutional improvement through quality and integrity. The paper also summarizes critical reviews of student learning assessment that indicate deficiencies in expected outcomes. The challenge posed by alternative content providers (e.g., General Assembly, Mozilla Foundation, edX, StraighterLine) is also discussed. Such organizations demonstrate that college-level content can be provided by entities that are neither colleges nor universities, and certainly not ones that have institutional accreditation. A thorough summary of the political and bureaucratic process by which accrediting organizations themselves are approved is provided. Finally, the concerns and problems inherent in a one-size-fits-all approach to institutional accreditation are detailed.

**Consortium Comments**

The Consortium commends the authors for a thorough and from our perspective balanced presentation of the complex issues involved in institutional accreditation. In general, we agree with the concerns raised; members of the Consortium have raised many of them themselves. The Consortium is, in general, inclined to support many of the suggestions offered pertaining to reforming accreditation.

The Consortium is compelled to point out that although the profile of certain nontraditional content providers and credential models is higher than it had been in the past, the fact of nontraditional content providers is hardly new. For instance,
corporate training centers such as “Hamburger U” and “Motorola University” have been around for decades, as have various other providers of television and correspondence delivered programs. Self-paced learning (often called Keller Plan courses in the 1960s) was widely used in such instruction, a precursor of individualized, self-paced online courses of today. Thus, the debate over how to recognize the learning and how to finance such learning is also not new. Additionally, frameworks for structuring learning, such as the currently widely discussed competency based education approach, was widely debated during the 1970s. We point these facts out not to dismiss them, but to suggest that the experiences we gained from those discussions and policy debates may inform similar debates today. We will return to these lessons later in our comments.

The Consortium agrees that the U.S. Department of Education’s propensity to push regulations, such as on the credit hour, makes innovation difficult and certainly does not reflect contemporary educational models and delivery processes. As noted in their recent reanalysis of the unit they invented, the Carnegie Foundation reemphasized that the credit hour was never intended to reflect academic quality. Until a bona fide replacement is found, however, the Department must be encouraged to be flexible.

The Consortium believes that a good step forward would be to return to the connection between accreditation and federal financial aid that existed in principle before 1992 and decouple the quality assurance aspect of accreditation from the compliance checking aspect. That is, to be eligible for federal financial aid an institution must be accredited, but the accrediting entity does not make the compliance determination with respect to any specific federal requirements for eligibility. For example we believe that the federal government should have rigorous financial standards for eligibility, but the government should have responsibility for adjudicating that eligibility. The Consortium believes that accreditation should focus on institutional quality and improvement, as it has for well over a century, and leave federal compliance issues to the federal government with the proviso that the U.S. Department of Education does not have free reign to impose whatever regulations it desires.

A focus on institutional quality and improvement, however, does not necessarily mean that issues that do not seem on the surface to be related to student learning, for instance, should be ignored. For example, some critics of the current approach to accreditation argue that capital improvement plans are irrelevant to the core mission of accreditation. But if the students are still using equipment from the 1970s in their science lab courses, we believe this matters as it may well have a deleterious effect on student learning. Thus, although the Consortium strongly
supports a refocusing of accreditation on a narrower definition of institutional quality and improvement and student learning, we caution that a too-zealous effort on that count may well jettison important information about the infrastructure that reasonable people would all agree are essential for learning to occur. The Consortium also believes firmly that the Department of Education must revise its financial responsibility indicators as part of the shift in compliance checking for financial aid eligibility. Specifically, NAICU, among other associations, has provided detailed input on this issue, including using accepted accounting standards. We fully endorse those recommendations.

The Consortium strongly supports risk-adjusted or differentiated accreditation reviews, and supports the current moves of the Middle States Commission on Higher Education, along with other Commissions, in this direction. Because the Consortium’s membership is quite diverse and spans two institutional accrediting commissions (Middle States and the Southern Association of Colleges and Schools Commission on Colleges), we have broad experience with various accreditation issues across institutional type. At this point, it is premature to endorse a specific alternative (i.e., geographic, Carnegie classification, etc.) without further careful analyses of the advantages and disadvantages of various models. We hold this position with respect to the discussion about creating a non-geographic basis for institutional accreditation. Although all of these ideas for different organizational structures for accreditation have merit the Consortium believes it is very important that various models be thoughtfully compared before implementing one in order that we act based on evidence and that we understand the consequences, both intended and unintended, of doing so. Regardless the outcome, we believe a risk-adjusted approach will improve the accreditation process.

The Consortium also supports a more nuanced, or gradated, accreditation system. For example, one alternative to the present binary outcomes might be permitting accreditors to simply list the standards with which the institution is or is not in compliance. Then, specific sanctions and action steps could be provided on those standards on which the institution is out of compliance. We are less sanguine about adding level of distinction; our concern is that such designation could easily be used as a quasi-ranking system that was never envisioned for accreditation.

The Consortium also heartily endorses an increased emphasis on student learning outcomes as central to the accreditation process. Because of the lack of a single assessment instrument that measures learning in all domains, institutions should have some input into how those assessments should be structured (i.e., include both traditional and alternative assessments such as portfolios). A role that accrediting organizations should play is to share what works well with institutions, and to
adopt a menu of options that would hold across all institutional accreditors. Such “best practices” are already emerging, and are shared through outlets such as the American Association of Colleges and Universities. Additionally, many professional associations have or are developing specific learning outcomes that students should be able to demonstrate. These should be used to guide the development of learning outcomes metrics. By working with associations that are well along with the development of learning outcomes assessments, the federal government and accreditors can avoid duplication and misguided mandates.

As noted earlier, the underlying principles behind the so-called innovative, nontraditional content providers are not new. What is new are the delivery mechanisms (e.g., online), ability to interact, and scale (e.g., massively open). So, at issue are the same questions that vexed the higher education community in the 1960s and 1970s: How do we ensure that the content being provided in ways other than through traditional postsecondary outlets is of appropriate quality? Whether the question is asked of content provided through Keller Plan type courses at the du Pont Company or through Coursera is immaterial. The Consortium argue that the appropriate approach regarding quality assurance for nontraditional providers is to have institutional accreditors take responsibility for the quality assurance processes for content. We believe this for several reasons:

- Given a shift in focus within accreditation to a much stronger emphasis on student learning outcomes, the focus of both traditional and nontraditional providers is now aligned.
- Institutional accreditors are currently the only organizations that apply quality assurance standards across a variety of content domains and across diverse types of institutional providers. Not every discipline has professional organizations that have specified student learning outcomes nor have created accreditation standards.
- Institutional accreditors already have the infrastructure to support accreditation activities, such as a network of peer accreditors. The creation of an alternative set of accreditors from scratch would be extremely expensive by comparison.
- Institutional accreditors would enable the comparison of student learning outcomes between traditional and nontraditional providers. Separation of function would likely result in approaches to student learning outcomes assessment that would not be comparable across providers.
- States have neither the infrastructure nor experience in accrediting postsecondary education programs. This is clearly evident from the push back states gave when it was suggested that they engage in this function as part of the state authorization of distance education requirement.
Finally, the Consortium agrees with the call to depoliticize NACIQI by separating it from the Department of Education and by limiting the Secretary’s ability to promulgate policy regarding recognition decisions beyond the scope of law.