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Assuring Quality in Higher Education:
Key Issues and Questions for Changing Accreditation in the United States

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Summary: Accreditation in the United States has evolved over the years in response to the changing higher education environment. There are at least three major changes in the current environment. One is the growing demand for increased accountability. Another is reduced funding and rising costs and pressures to find more cost-effective solutions in every aspect of higher education. Finally, there is the changing structure and delivery of higher education including new types of educational institutions and the increasing use of distance learning that allows institutions to operate on a national and global scale. This paper seeks to describe the current accreditation system and frame the key issues for discussion.

Introduction

For more than 100 years, the accreditation system in the United States has been used as the primary vehicle for defining and assuring quality in the delivery of higher education services. In this complex public-private system, recognized accreditation organizations develop quality standards and manage the process for determining whether institutions and programs meet these standards and can be formally accredited. Accrediting organizations play a key "gatekeeper" role in higher education because accreditation is used to determine whether higher education institutions and programs are eligible to receive the over $80 billion in federal and state grants and loans available annually and provides the primary means to inform and protect consumers against fraud and abuse.

There has been growing criticism of higher education and the accreditation system and a growing debate over how to change accreditation. This growing debate centers around three major sets of questions and issues:

- Assuring Performance. How can the accreditation system be held more accountable for assuring performance, including student-learning outcomes, in accrediting institutions and programs?
- Open Standards and Processes. How can accreditation standards and processes be changed to be more open to and supportive of innovation and diversity in higher education

including new types of educational institutions and new approaches for providing educational services such as distance learning?

- <u>Consistency and Transparency</u>. How can accreditation standards and processes be made more consistent to support greater transparency and greater opportunities for credit transfer between accredited institutions?

While the accreditation system has taken steps in recent years to address these issues, after almost twenty years of dialogue and debate, there is still no clear consensus on how to change accreditation to respond to these new demands.

Given the critical role of accreditation in assuring quality in higher education and providing a gateway to federal and state funding, the Secretary of Education's Commission on the Future of Higher Education will, as part of its national dialogue, review the current system of accreditation and seek input from the accreditation community and other higher education stakeholders on how to change accreditation.

The purpose of this paper is to provide a basic understanding of the current system and propose the key issues and questions for use in this dialogue.

Overview of Accreditation

Accreditation was originally practiced by colleges as a means to determine quality in high schools, so that higher education institutions could be assured that secondary graduates met acceptable standards for admission. Later, colleges themselves began to participate in accreditation to assure that credits earned by transfer students from one higher education institution to another would be acceptable. Accreditation later evolved into a private, non-governmental "self-regulation" system for universities and colleges to assure that both public and private institutions of higher education and their programs met acceptable levels of quality.

After World War II and with the passage of the G.I. Bill, the accreditation system began to change. With the growth in federal student aid the federal government began to use this non-governmental accreditation system to determine the eligibility of higher education institutions to receive federal student financial assistance and other federal funds. States used similar strategies and made the accreditation system the key "gatekeeper" for both federal and state funding.

Accreditation in the United States has since evolved into a large and complex public-private system that is designed to assure quality in higher education and be the gatekeeper for access to federal and state funding. The accreditation process still remains a largely voluntary process controlled by private accreditation organizations with strong connections to the higher education community. However, because most higher education institutions and programs are dependent on federal and state student grants and loans, accreditation is becoming increasingly a requirement for doing business in higher education. And, the federal government is playing a larger role in ensuring that private accreditation organizations are protecting the public interest in assuring the quality of postsecondary education institutions and programs

The accreditation system reflects the diversity and decentralized structure of higher education with a range of accreditation organizations using different standards and processes in making accreditation decisions. The accreditation system has enormous reach in the United States involving almost 100 public and private accrediting organizations that accredit more than 6,400 institutions and 18,700 programs.

This process is managed by national, regional, and specialized accreditation organizations, many times called "accreditation agencies." The accrediting organizations develop the quality standards or criteria for accreditation, develop and manage the accreditation process, and make the final decision on accreditation.

There are three types of accreditation organizations — regional, national, and specialized or programmatic.

- <u>Regional</u> accrediting agencies operate in six different regions in the U.S. and review entire institutions. Of the 2,963 regionally accredited institutions, 97.4% are traditional, non-profit, degree-granting colleges and universities.
- <u>National</u> accrediting agencies operate throughout the country and review entire institutions. Of the 3,458 nationally accredited institutions, 35.9% are degree granting and 64% are non-degree granting, 20.9% are non-profit and 79% are for-profit. Many of the nationally accredited institutions are single-purpose institutions (e.g., information technology).
- <u>Specialized</u> accrediting agencies operate throughout the country and address programs, departments, or schools in specific fields (e.g., business, law) that are parts of an institution. Some specialized accrediting organizations also accredit professional schools or other specialized or single purpose institutions. Some specialized accrediting agencies are state government agencies such as agencies responsible for regulating healthcare professions. There are 18,713 of these accredited programs and single purpose institutions.

The federal government, through the United States Department of Education (Department), and the Council on Higher Education Accreditation (CHEA) both recognize accrediting organizations. The federal process is distinct from the CHEA non-governmental process. The Department's criteria for recognition and the recognition process are different than the criteria and process used by CHEA. <u>Only organizations recognized by the Department are able to accredit educational institutions and programs making them eligible to receive federal student financial assistance and other federal funding</u>. CHEA regularly publishes a listing of regional, national, and specialized accrediting organizations that are recognized by the department, CHEA and both. In November 2005, CHEA reported that the Department recognized 60 accreditors, 61 accreditors were recognized by CHEA or undergoing a CHEA review and 37 of these accreditors were both Department and CHEA recognized (Attachment A).

<u>Federal Government Recognition</u>. Since the 1950's, the federal government has used this non-governmental accreditation system to determine the eligibility of higher education institutions to receive federal student financial assistance and other federal funds. A federal recognition process for national and regional accreditation organizations was established in the Office of the U.S. Commissioner of Education to produce a list of federally recognized accreditation organizations.

This recognition process, including the quality standards used in the process, were then put into federal law in the Higher Education Act (HEA) as amended. This linkage between accreditation and federal funding increased the incentives of public and private educational institutions to be accredited by a federally recognized accreditation agency. It also increased the need for a close relationship between the federal government and accreditation organizations in establishing accreditation standards and practices to ensure quality.

The primary role of the federal government is to recognize accreditation organizations to accredit educational institutions and programs to make them eligible to receive federal student financial assistance and other federal funding. The U.S. Department of Education recognizes accrediting organizations to ensure that these organizations are, for the purposes of the Higher Education Act of 1965, as amended (HEA), or for other Federal purposes, reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit. The department lists an organization as a nationally recognized accrediting organization if the organization meets the quality criteria or standards for recognition.

The U.S. Department of Education has established standards for use in the recognition of accrediting organizations based on federal legislation. According to these criteria or standards, any "recognized" organization must demonstrate that it has an accreditation process that effectively addresses the quality of the institution or program in the following areas:

1. 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.
1. Curricula.
2. Faculty.
3. Facilities, equipment, and supplies.
4. Fiscal and administrative capacity as appropriate to the specified scale of operations.
5. Student support services.
6. Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.
7. Measures of program length and the objectives of the degrees or credentials offered.
8. Record of student complaints received by, or available to, the agency.
9. 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.

The Secretary's National Advisory Committee on Institutional Quality and Integrity (NACIQI) and the Accrediting Agency Evaluation Unit within the Office of Postsecondary Education at the U.S. Department of Education were established to carry out the federal responsibilities in accreditation. The responsibilities of the NACIQI and the Accrediting Agency Evaluation Unit are listed in Attachment B.

Non-Governmental Accreditation and Recognition. As noted above, the non-governmental accreditation system was designed as a self-regulation mechanism for higher education to ensure basic levels of quality in education through a peer-evaluation of educational institutions and

programs. In this approach, national and regional private non-profit organizations called "accreditation organizations" develop quality standards and processes for determining if educational institutions and programs meet these standards.

The accreditation process is voluntary and must be requested by educational institutions or program. Institutions and/or programs that request an agency's review and that meet the agency's quality criteria or standards are then "accredited" or formally certified by that agency. The process usually involves five key features: (1) self-study by the institution requesting accreditation, (2) peer review conducted primarily by faculty, administrators and members of the public, (3) site visits of the peer review team, (4) recognition actions by the commissions of the accrediting agency, and (5) monitoring and oversight over a designated time period ranging from every few years to ten years.

For more than 50 years, this non-governmental accreditation system has been coordinated by a non-governmental coordinating agency. The Council for Higher Education Accreditation (CHEA) was created in 1996 and is the currently the entity that coordinates this system. CHEA is a membership organization made up of approximately 3,000 colleges and degree granting universities. The primary role of CHEA is to assure and strengthen academic quality and ongoing quality improvement in courses, programs, and degrees through the accreditation process.

CHEA also promotes the integrity and coordination of non-governmental accreditation through a formal recognition process for accreditation organizations involving five major recognition standards. Since 1998, these five standards have ensured that accreditation organizations address how an educational institution:

1. Advances academic quality;
2. Demonstrates accountability;
3. Encourages purposeful change and needed improvement;
4. Employs appropriate and fair procedures in decision-making; and
5. Continually reassesses accreditation practices.

However, accreditation agencies recognized by CHEA still have wide latitude in addressing and implementing these five standards. Although these standards promote greater integrity and consistency, they still allow accrediting organizations to retain different accreditation standards and processes. Again, they also are different then the standards or recognition criteria used by the federal government.

Key Issues and Questions for Changing Accreditation

As described earlier, the growing debate over changing accreditation has centered around three major sets of issues and questions. This section provides background for each and then provides a list of more detailed questions for discussion.

Assuring Performance Issues. The first set of issues and questions relate to how the accreditation system can be held more accountable for assuring performance, including student-learning outcomes, in accrediting institutions and programs.

Many proponents of greater public accountability in higher education and accreditation argue that the most important evidence of quality is performance, especially the achievement of student learning outcomes. This has lead to a number of national and state efforts to identify a broad range of performance indicators or measures including access, productivity and efficiency, student learning, degree completion, and economic returns from postsecondary education. Many of these performance measures and indicators are represented in Measuring Up: The National Report Card on Higher Education (National Center for Public Policy and Education, 2004).

States have taken a major leadership role in establishing performance accountability systems to drive improvement in higher education. Most states have now established performance-reporting systems for higher education that address one or more performance measures (Wellman 2003, SHEEO, 2005). It is important to note that these performance accountability systems and related state regulatory systems (e.g., program approval, proprietary school certification) represent another layer of quality assurance in higher education that is largely disconnected from and inconsistent with the quality standards and processes used in accreditation.

There has been a long-standing debate on the whether accreditation should be accountable for assuring performance to the government and the public that higher education institutions and programs are effective in achieving results, especially student learning outcomes. Currently, accreditation standards focus primarily on resource and process standards (e.g., faculty qualifications, facilities and support services) and do not require evidence that institutions have achieved results consistent with their missions, especially student learning outcomes. They also maintain that accreditation has a long way to go in establishing quality standards for student assessment to assure that institutions can and do provide valid and reliable evidence of student learning outcomes (Ewell, 2002).

Recently, federal and state policy-makers have called for accreditation to require accredited higher education institutions and programs to report valid and reliable information on their performance to the general public. This can be most clearly seen in the debate over whether accreditation should be responsible for consumer profile systems proposed in the reauthorization of the Higher Education Act. However, there is no agreement on how this proposed requirement in accreditation would be linked to existing federal and state reporting requirements including state performance accountability systems.

The federal government and accreditation organizations have taken some steps to address many of these criticisms of higher education and the accreditation system. The federal government and accreditation organizations now make explicit reference to performance outcomes or measures of institutional effectiveness in their quality standards. Many accreditation organizations also make explicit reference to providing information on institutional effectiveness to the general public. Some accreditation organizations, especially those driven by professional licensure, have moved to "outcome-based accreditation." Other accreditation organizations have held forums and workshops on how to balance the emphasis on resources, processes, and outcomes in accreditation decisions and how to improve evidence of student learning. However, implementation has been limited and inconsistent across the accreditation community.

Assuring Performance Questions

- What is the appropriate balance between resource and process standards and evidence of performance (including student learning outcomes) in the overall accreditation decision?

- Should accreditation be held accountable for assuring that institutions and programs have clearly defined student learning outcomes and valid and reliable assessment systems for providing evidence of student learning? If so, what is the best approach for doing this? How should this be coordinated with national and state efforts to promote external assessment systems?

- Should accreditation be held accountable for assuring that accredited institutions provide valid and reliable information to the public on performance along with other types of consumer information? If so, how should this requirement be linked to federal and state reporting requirements and performance accountability systems?

- What is the best approach for establishing new accreditation standards and processes for accreditation organizations that address these issues?

<u>Open Standards and Processes Issues.</u> The second set of issues and questions relate to how accreditation standards and processes can be changed to be more open to and supportive of innovation and diversity in higher education including new types of educational institutions and new approaches for providing educational services such as distance learning.

The accreditation system in the United States was originally designed to recognize and support diversity in institutional mission and structure for traditional place-based educational service delivery. However, some believe this system has not been sufficiently updated to promote the growing diversity in types of educational institutions, especially for-profit institutions and new approaches to educational service delivery such as distance learning. They also question whether traditional standards and processes allow for innovations that have the potential to improve access and performance and reduce costs within both traditional and non-traditional educational institutions.

The rise of private, for-profit entities has also prompted discussions about how best to assure and promote quality in higher education based on leading public and private practices. Some critics argue that the quality standards used in accreditation are out-of-date and do not reflect leading quality practices at leading higher education institutions and in government and the private sector. They argue that accreditation standards should be redesigned to promote these leading quality standards and practices such as those in the Baldrige criteria.

Many accreditation organizations are addressing these issues. They have explored the implications of new types of educational institutions and distance learning for revising and updating current quality standards in accreditation (Eaton, 2002). Some accreditation agencies have reviewed leading quality standards such as the Baldrige criteria and have incorporated them into their standards and processes, especially for how to promote continuous improvement in higher education. However, significant concerns still remain about whether accreditation organizations are going far enough.

Open Standards and Processes Questions
- Do current accreditation standards and processes used by many accreditation organizations create barriers to innovation and diversity including new types of educational institutions and new approaches for providing educational services such as distance learning?

- If so, how do we create new process, resource and performance standards that are unbiased and are open to all types of educational institution and approach for delivering educational services including distance learning?

- What can be learned from leading quality standards and practices in the public and private sectors such as Baldrige?

- What is the best approach for establishing new accreditation standards and processes for accreditation organizations that address these issues?

Consistency and Transparency Issues. The third set of issues and questions address how accreditation standards and processes can be made more consistent to support greater transparency and greater opportunities for credit transfer between accredited institutions.

As described earlier, the accreditation system in the United States has a very decentralized structure that reflects the diversity in the types and missions of higher educational institutions and programs in the United States. This has long been considered a major strength of the current system. However, some have argued that the current decentralized structure of accreditation is not consistent with the growing national and international scope of operations of higher education and poses major problems in establishing standards and processes for quality assurance. They question the need for regional accreditation organizations when most higher education organizations offer educational services throughout the country and the world.

The lack of consistency and transparency in the accreditation system has now created major concerns about whether the accreditation community is able to assure consistent levels of quality and be counted on to support national and state efforts to improve performance, promote innovation, and expand credit transfer. The concern is growing as students are increasingly earning credits at multiple higher education institutions and through many different types of delivery systems putting additional pressure on the system to recognize and grant transfer credit.

Accreditation organizations have attempted to promote the need for greater consistency and coordination. For example, CHEA established a core set of recognition standards and a recognition process for improving the quality and consistency of accreditation in the United States and has promoted guidelines and principles for credit transfer. However, there still remain major differences across national and regional accreditation organizations.

Consistency and Transparency Questions
- Is there a need to improve the standardization and consistency of the standards and processes used by accreditation organizations for quality assurance? Is so, what is the best approach for getting this done?

- How can accreditation be used to promote credit transfer within higher education? What is the best approach for getting this done?

Attachment A

Comparison of Federal and CHEA Recognized Accreditation Organizations

Attached

Attachment B
Federal Roles and Responsibilities in Accreditation

The Secretary's National Advisory Committee on Institutional Quality and Integrity (NACIQI) provides recommendations to the Secretary of Education regarding:

The establishment and enforcement of criteria for recognition of accrediting organizations or associations under Subpart 2 of Part H, Title IV, of the HEA.

- The recognition of specific accrediting organizations or associations or a specific State approval agency.
- The preparation and publication of the list of nationally recognized accrediting organizations and associations.
- The eligibility and certification process for institutions of higher education under Title IV, of the HEA.
- The development of standards and criteria for specific categories of vocational training institutions and institutions of higher education for which there are no recognized accrediting organizations, associations, or State organizations in order to establish the interim eligibility of those institutions to participate in Federally funded programs.
- The relationship between (1) accreditation of institutions of higher education and the certification and eligibility of such institutions, and (2) State licensing responsibilities with respect to such institutions.

The Accrediting Agency Evaluation Unit within the Office of Postsecondary Education at the U.S. Department of Education provides support for the Secretary's National Advisory Committee on Institutional Quality and Integrity and:
- Conducts a continuous review of standards, policies, procedures, and issues in the area of the Department of Education's interests and responsibilities relative to accreditation;
- Administers the process whereby accrediting organizations and State approval organizations secure initial and renewed recognition by the Secretary;
- Serves as the Department's liaison with accrediting organizations and State approval organizations;
- Provides consultative services to institutions, associations, State organizations, other Federal organizations, and Congress regarding accreditation;
- Interprets and disseminates policy relative to accreditation issues in the case of all appropriate programs administered by the Department of Education; and
- Conducts and promotes appropriate research.

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