A NATIONAL DIALOGUE:
The Secretary of Education's Commission
on the Future of Higher Education

ISSUE PAPER

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Assuring Quality in Higher Education: Recommendations for Improving Accreditation

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(Compiled and written as a discussion paper with input from Commissioners, accreditors, state officials, college executives and consultants)

I. Foreword

On October 17, 2005, Secretary Margaret Spellings announced the formation of the Commission on the Future of Higher Education. The Commission was created with the goal of launching a national dialogue on the future of higher education and called for an examination of how we can get the most out of our national investment to ensure that our higher education system continues to meet our nation's needs for an educated and competitive workforce in the 21st century. The Secretary asked the Commission to focus on four key areas in its work: accessibility, affordability, accountability, and quality.

Given the critical role of accreditation in assuring quality in higher education; providing a gateway to federal, state, and private funding; and promoting accountability, the Secretary of Education's Commission on the Future of Higher Education recently reviewed the current system and conducted a dialogue with the accreditation community and other higher education stakeholders on how to improve accreditation. This paper presents the results of those efforts.

II. Overview

Accreditation plays a vital role in American higher education because both the higher education community and government use the system to promote and assure quality and protect the public interest. Accreditation is one of the major ways in which the higher education community sets expectations for quality and how government and the public define and communicate the overriding public interest in higher education.

Accreditation is a very large and complex public-private system of federal, state and private regulators. Accreditation is founded on the principles of self-regulation and peer review. The vast majority of accreditation organizations are membership organizations governed by the institutions and programs they accredit. These private accreditation organizations work cooperatively with their members to develop standards for quality. They also use member volunteers to conduct a peer

review process to determine whether institutions and programs meet standards and can be formally accredited. This process is also used to promote improvements in quality through self-study and peer recommendations.

Starting in the 1950s, the federal government has used this private system of self-regulation as a mechanism to qualify institutions and programs for federal grants and loans. The federal government established federal quality standards and used these standards to recognize private accreditation organizations to play this role. Since then, accreditation organizations have played 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. Employers have also used accreditation to determine how their employees can access and use the billions of dollars in tuition aid benefits that their organizations offer. The overriding public interest in accreditation over the last 50 years has been defined in terms of protecting consumers as well as federal and state student grant and loan programs from flagrant fraud and abuse.

Accreditation has evolved over the years in response to the changes in the higher education environment. The number and diversity of accrediting organizations has grown in response to the growing diversity of higher education institutions, new delivery mechanisms such as distance learning, and growing public and private interest in assuring quality in specific programs such as education, business, and engineering. This has led to the establishment of over 100 accrediting organizations with different quality standards and processes that are not fully comparable and transparent to government and other public stakeholders.

The purpose of this paper is to provide a general overview of the major challenges facing higher education that have implications for accreditation based on the dialogue with the accreditation community and its stakeholders. The paper concludes with major recommendations for improving accreditation in the United States.

III. Major Challenges To Accreditation

The new higher education environment is challenging the very foundations of traditional accreditation and raising questions about whether accreditation must undergo a more fundamental transformation. There are at least five major developments that are posing challenges to the existing accreditation system.

- Global Competitiveness & Quality. Concerns over the United States ability to compete globally and maintain the quality of our higher education system are mounting. A robust higher education system is critical to the future economic competitiveness of the United States and provides the major pathway to economic success for students and workers. In this environment, the focus on meeting minimum quality standards is no longer sufficient. It is necessary to put American higher education on the journey to performance excellence in a highly competitive world. *There is an urgent need to strengthen the quality of American higher education, especially given the growing tension between institutional and public definitions of quality and rigor.* Accreditation must play a key role in influencing higher education to move beyond minimum or adequate quality to

performance excellence. This must be done with clear recognition that institutions and programs vary in their missions and, as a result, the definition of performance excellence must always be developed in relationship to institutional and program mission and the performance of peers sharing similar missions. This effort also should be based on the guiding principle of continuous improvement with accreditation requiring that institutions and programs show evidence of continuous performance improvement as the basis for achieving or retaining accreditation. The Baldrige criteria for performance excellence provide a promising starting point for determining how to define performance excellence and how to ensure that institutions and programs are pursuing continuous improvement. The Baldrige criteria require organizations to define performance excellence in terms of the performance of similar or peer organizations who represent "best in class" performance. This would ensure that institutions and programs are pursuing performance excellence while at the same time not being compared with institutions and programs that have much different missions. The Baldrige criteria also require the reporting of evidence of continuous improvement on a wide variety of performance measures relative to selected peer organizations.

- Accountability. There is growing demand for increased accountability to government, consumers and the general public. The public is calling for increased transparency and reporting of consumer-friendly information relating to the performance of higher education. *Accreditation can play a major role by changing accreditation standards and placing a strong emphasis on performance outcomes, especially student learning outcomes.* While there have been significant efforts at the state, institutional and program levels to include new accountability requirements, a tremendous disconnect still exists. This disconnect is manifest in the varying requirements between state accountability systems and private accreditation, among various accrediting bodies, among the different states, and between the Department of Education and CHEA. Additionally, accountability has been "mission or program defined," which may not necessarily reflect the public interest. As a result, outcomes are not easily translated to the public, lack comparability across institutions, and do not lead to a "public accountability" system. Accreditation must play a key role in requiring the reporting of information to the public based on a consistent template for reporting comparable and consistent information that is relevant to key stakeholders and the general public. This template must balance the need to provide consistent and comparable information with the need to respect differences in institutional and programs missions.

- Changing Structure of Higher Education. The changing structure and delivery of higher education includes new types of educational institutions and the use of distance learning, which allows institutions to operate on a global scale and holds the potential for improving value and access. The traditional boundaries of geography, academic disciplines and programs, and modes of delivery are blurring. Students are now attending multiple educational institutions and utilizing different delivery systems, often simultaneously. These new realities require new solutions to ease the transfer process. The accreditation process, while responding to institutional and programmatic interests, may not be equipped to respond to the demands of this new environment. Already, accreditation has become overloaded with new requirements. The accreditation system has inherited

functions sometimes beyond its scope and expertise. Accreditors have expressed concern that peer review and volunteerism in the current system will be overcome by "creeping legalism." As the higher education system becomes more complex, however, an emerging capacity issue develops if institutional review continues to rely on peer review and volunteerism. For example, volunteers may not have the requisite expertise in outcomes assessment or review of financial documents.

- Transparency. The system of accreditation is very complex and difficult to understand. The public-private system of accreditation must become more open and transparent to provide assurances that it is balancing institutional and public interests in setting standards and accrediting institutions and programs. This will require more consistency in accreditation standards and more involvement of outside stakeholders in the accreditation process.

- Value and Affordability. Rising costs and reduced federal and state funding are pressuring higher education institutions to increase affordability and improve the value of and returns on higher education. Shrinking resources for higher education also demand that funds are used wisely and to the benefit of the public interest. Additionally, while accreditors view the accreditation process as an "investment," institutions often view it as a significant cost with little return on investment. The accreditation process rarely lends itself toward efficiency, productivity improvement, or "cost cutting." Specialized accreditors are viewed as a guild designed to protect the guild from the public.

IV. Promising Efforts

It is important to note that over the last decade there has been significant progress and pockets of success in improving accreditation. Since 1992, the federal government has required accreditation agencies to develop standards that include "success with respect to student achievement in relation to the institution's mission, including, as appropriate, consideration of course completion, state licensing examinations, and job placement rates (note: this requirement was placed ninth in the 1992 amendments, but was moved to first in 1998). The new emphasis on measuring student learning prompted efforts by accreditors to respond to this requirement. All regional accrediting agencies have rewritten their standards for review to include a new standard on learning results. The ABET, Inc., as the recognized US accreditor of postsecondary degree-granting programs in engineering, redesigned its accreditation criteria to shift from a focus on inputs (e.g., program curricula, faculty, and facilities) to an outcomes-based accreditation model. In addition, every state has developed some type of accountability report for higher education for use in policy, oversight and budget consideration.

The emerging accountability agenda for higher education provides an opportunity to coalesce around these isolated efforts and build national capacity to promote and assure quality and accountability of higher education.

V. Recommendations

The Commission, with special focus on the needs of the public, should recommend that the

Secretary of Education, create a National Accreditation Working Group (working group) with broad involvement of all major accreditation stakeholders, to develop a national blueprint for transforming accreditation. This blueprint would address the following:

1. Strengthen Public-Private Governance .

Recommendation: To ensure that the public interest is served, the current self-regulation system must be expanded to allow for greater public-private involvement in accreditation and must include balanced representation from the higher education community and public and private stakeholders, including employers and federal and state governments. This broad involvement is necessary to create accreditation recognition standards and processes that address the needs of all stakeholders resulting in greater consistency and transparency across the system. This strengthened public-private governance must occur at three levels:

- Governance of the National Recognition Process. All stakeholders must be involved in the development and use of recognition standards used by the Department to recognize accreditation organizations. This strengthened public-private governance is necessary to align existing accreditation requirements across state and federal government and all accreditors (e.g., regional, national and specialized) to meet both public and private interests.
- Governance of Accreditation Organizations. Accreditation organizations are largely membership organizations governed by the institutions they accredit. Although accreditation organizations now have representation from the public on their boards, the level of presentation and engagement is not sufficient. Require accreditation organizations to be led by governing boards with balanced representation between all major public and private stakeholders including employers, federal, and state government.
- Institutional and Accreditation Review Process. Voluntary peer reviewers from member institutions who represent the interests of institutions and programs conduct accreditation reviews. To assure the public interest is served and to promote transparency the reviews should be conducted by formally trained and certified independent reviewers that are experts in the application of national accreditation standards in the accreditation process.

Rationale:

- The historical foundation of accreditation is based on a model of self-regulation with minimal public input and government interference. There are three key elements of the self-regulation system:
    - Accreditation organizations are membership organizations of institutions being accredited;
    - Accrediting organizations and their member institutions set their own standards and review processes;
    - Review and accreditation are conducted by administrative and faculty peer "volunteers" and not by external experts who are specialists in conducting quality reviews or audits.
- The federal gatekeeper role of accrediting bodies has led to creeping government controls, legal challenges, and growing tension between a focus on improvement and compliance with government requirements.

- There is growing demand for greater public involvement in quality assurance to ensure that the public interest is being protected. The credibility of self-regulation and internal governance of accreditation is being questioned and requires more public representation and transparency.
- The challenge is developing a new public-private governance model, which balances industry self-regulation and the public interest.
- Quality control examples from other sectors may provide strategies for developing this new model.

2. Develop National Accreditation Framework.

Recommendation: Accreditation should hold higher education accountable for results. In accrediting institutions and programs, all accrediting bodies should place a stronger emphasis on performance outcomes, especially student-learning outcomes, in accreditation decisions. The national accreditation framework would contain three essential components:

- Performance Outcome Measures. The strongest emphasis would be placed on the demonstration by institutions and programs that they are producing results, especially evidence of student learning. The framework would report student learning based on standards for valid and reliable assessment. The framework would also contain a set of comparable performance measures that include student learning that would be tailored according to institutional mission and program so they can be used for both accreditation and public reporting and consumer profiles.
- New Process Standards. The framework would promote more open and flexible process standards that encourage innovation and diversity in higher education and do not prescribe specific input and process standards (e.g., facilities, faculty). These national process standards would be based on proven public and private models such as Baldrige. The Baldrige standards are open because they do not prescribe specific organizational structures, resources, or approaches but only require that organizations have the capacity to manage organizational learning and continuous improvement (e.g., information management, process management). They are flexible because they promote creative solutions that are continuously being changed and adapted and are effective in getting results and promoting continuous improvement.
- Continuous Improvement. The framework would require institutions and programs to move toward world-class quality and report measurable progress in relationship to their national and international peers. This requirement would be modeled using leading best practices for benchmarking and continuous improvement techniques.

Rationale:

- In the current higher education environment different standards based on regions or types of institutions do not make sense or serve the public interest.
- There is a need to balance performance outcomes and processes.
- Accreditation should promote continuous improvement and benchmarking to best practices.
- Accreditation needs to move from assuring minimum quality to promoting continuous improvement toward performance excellence.

- Institutions should be required to set challenging goals based on best practices benchmarks. Institutions should select peers (national or global based on mission and goals) and provide comparative benchmark information of peer institutions on performance metrics.
- There is a need for both national and global benchmarking capabilities for all types of institutions and programs.
- Currently, there are no established student learning benchmarks utilized by accreditors.

3. Set Expectations and Build Capacity for Measuring Student Learning.

Recommendation: Develop national standards for how institutions and programs define and assess their own student learning performance and propose strategies for building the capacity of institutions and programs in meeting these goals. These standards should address the following:

- Defining Student Learning Outcomes. These standards should require institutions and programs to define their learning outcomes based on their own missions and the input of the employers and other stakeholders. However, these standards should require institutions and programs to use a common format so that similarities and differences are transparent to students, parents, and employers.
- Valid and Reliable Assessments. These standards also should establish some requirements for valid and reliable assessments so that accrediting organizations can provide the public some assurance that students receiving degrees or other types of credentials have the skills that institutions and programs claim.

Rationale:

- There is a growing consensus on the need to measure student learning. This requires defining what students should know and be able to do and providing evidence that this has been accomplished.
- It will be necessary to provide better guidance and support to make this process happen consistently across institutions.
- The process will have to create the template of measures that focuses on student learning and provides a balance of other measures (e.g. persistence, graduation, labor market measures).

4. Promote Greater Transparency.

Recommendation: Develop information management standards that address how all accredited institutions and programs should manage, report, and share information as a condition of accreditation. These standards should minimally address:

- Public Reporting and Consumer Profiles. The information that must be provided to the public, including performance outcome information, for standard government reporting and consumer profiles.
- Sharing Student-Level Information. The standards that must be followed in sharing student-level information for measuring performance and promoting continuous improvement while at the same time, protecting privacy and security.

- Assuring Data Quality. The standards that must be followed in managing and reporting information (e.g., web sites, publications, reports, consumer profiles) to provide assurance that institutions and programs are providing valid and reliable data to the public.

Rationale:

- Transparency as a concept is absolutely critical, however it is not enough; institutions need practical tools to accomplish it.
- The system needs a common template for reporting institutional and program-level data.
- To enhance credibility, consumers need accurate information on curriculum, services, and costs.
- More consistency in accreditation standards and more involvement of outside stakeholders in the accreditation process are necessary to achieve transparency.
- To assure accuracy and fairness, the system must require validation of the self-reported information that institutions and programs provide to consumers.

VI. Conclusion

- New developments in higher education require a major transformation in the accreditation process toward a more public-private system of governance based on national if not global standards and processes that are conducted at arms length from those being accredited.
- The overriding public interest for the 21st century is promoting accountability for moving to world-class quality and performance.
- Accreditation cannot be disconnected from other public and private systems that address accountability and the protection of the public interest. It must be the linchpin.
- The accreditation process must move from an emphasis on process to an emphasis on outcomes.