PANEL PARTICIPATION

*Perspectives on Federal and State Interests*

*On Institutional Accreditation and Quality Assurance*

*In American Higher Education*

For

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The Dilemmas of Modern Institutional Accreditation as a Quality Assurance Framework From the State & Federal Perspective.

**The First Dilemma: Validity**

Accreditation today faces issues with both *content validity* and *face validity*.

With respect to content validity, accreditation faces three issues.

First, it remains focused primarily on process, rather than desired outcomes as the appropriate measure of quality. While measures of some desired outcomes, such as student learning, have been introduced into the accreditation process, the bulk of the process remains focused on process factors. Virtually every corrective action recommended in accreditation deals with process factors such as governance, finances, curriculum, academic support, or student support; not with student learning or other outcome factors. And, even though consideration of student learning outcomes are now required by virtually all accrediting bodies, the metrics used to measure student learning are not required to be externally validated nor are explicit achievements in student learning required of the institutions being accredited.

Second, the pass/fail nature of accreditation, with virtually all institutions “passing” provides little evidence of the relative success or lack thereof of institutions, at least in the public domain.
Third, the nature of the accreditation teams, composed almost entirely of people from within the academy and of people with relatively modest training for conducting the accreditation visits raises issues of both the adequacy and potential conflict of interest in the reviews.

With respect to face/external validity, accreditation faces two quite contradictory dilemmas.

On the one hand, for some consumers of accreditation – prospective students, their families, businesses hiring college graduates, and some states – accreditation is the perceived as the “gold seal of approval” and connotes a level of institutional quality that simply may not be legitimate.

On the other hand, for some other consumers of accreditation – many state and federal governmental bodies, businesses looking for true measures of quality, discerning prospective students and their families, and often critics within higher education – knowledge of the issues around content validity and the lack of transparency raise issues about the efficacy of accreditation as a legitimate form of quality assurance.

Confounding these disparate perceptions of accreditation as higher education’s form of quality assurance, institutions of higher education often like it both ways. We often argue that accreditation’s real “reason for being” isn’t external validation, but rather self-improvement, which requires the institutionally owned (self-study) and non-public disclosure elements of modern accreditation. Yet, many institutions also are quick to use this imprimatur of quality as an indication of their legitimacy, often
contending for example that they share the same accreditation status as the most elite institutions in the country.

**Second Dilemma: Transparency**

Modern accreditation is an essentially private process, with the final determination of whether to grant accreditation made public, but none of the individual findings within the accreditation review made public unless an institution chooses to make such results public. This lack of transparency of the results of the process creates at least three dilemmas.

First, it makes suspect the efficacy of the process. In the past, there was, without doubt, much greater trust in processes like accreditation. It was generally accepted that members of the academy were both trustworthy to act with the highest integrity and were the most qualified to judge the quality of academic institutions. With the advent of a stronger focus on public accountability, particularly in public institutions (both educational and otherwise) public policy and public accountability have taken on a much more evidence based nature, requiring more proof and less trust. The lack of transparency in higher education accreditation not only fails to provide this expected level of evidence, but erodes the traditional level of trust that existed between the public and higher education.

Second, the pass/fail nature of accreditation (with some variations, but not much) fails to meet the test of modern quality assurances schemes. We are all familiar with *Consumer Reports* quarter, half, three-quarter, and full moons, providing the
consumer with an assessment of the quality of products, based on demonstrated performance.

Accreditation lacks this useful consumer information. To some extent other new forms of accountability, such as the voluntary system of accountability (VSA) and transparency by design (TBD) have begun to provide rudimentary evidence of “differences”, but in general American higher education has resisted such efforts, contending the our differences are one of the essential strengths of our efforts. That argument, however, sounds a bit self-serving in the modern era. After all, higher education compares itself on issues of quality in other arenas. We do so in intercollegiate athletics, doing so in ways that preserve and celebrate our differences. And, we do so in our associations, with institutions comfortably self selecting groups of other institutions with whom to be associated.

It makes no sense for an institution with a 12 percent graduation rate to have the same accreditation status as Stanford University with a 98 percent completion rate.

**Third Dilemma: Cost**

Good quality assurance costs a fair bit to provide. And, accreditation is no exception.
The current self-study approach to accreditation, for example, costs institutions quite a bit because of the substantial amount of time and effort required to conduct the self-study. The accrediting community has accommodated this substantial expense by requiring such reviews only every few years – generally seven to ten years. Not only does this process costs institutions substantial resources, it also costs the accrediting agencies a substantial amount, which they defray by using volunteer services of members of the peer review teams from within the academic community. The result, however, is a process that relies on volunteered activities in great part, and thus has little professional evaluation expertise, simply because it would be cost prohibitive to pay for such a cadre of oversight professionals. Interestingly, it is not too expensive in intercollegiate athletics, where the NCAA provides such professional oversight, but it is in our core business.

So, our dilemma is that accreditation is both too expensive and not expensive enough.

_The Solution_

So what is the solution to a system that appears to be validity challenged, non-transparent, and either too expensive or not expensive enough.

Well, the answer is not to abandon accreditation, nor is it to have accreditation revert to serving one or the other of its dual roles of institutional self-improvement and public quality assurance. Accreditation certainly has its flaws, but it is too valuable to lose and I
believe it is possible to change it in ways in which it can be more efficacious in both areas.

With respect to the institutional self-improvement process, I believe it is a pretty good system as is. I’m quite impressed with the changes that the Northwest Commission has adopted, which moves this more to a continuous improvement model, rather than the ten year plan. It will be important to follow the development of this plan, however, to assure that it maintains a focus on change and improvement in a cohesive strategic way, and not in ad hoc incremental steps. Measuring outcomes remains one area that continues to need more focus. This is true both for student learning and also with respect to other critical missions of the institutions, such as research. These measures need to assure greater externally validated content validity, and institutions need to be held to achieving improvement toward their goals.

With respect to the public quality assurance process, I believe that this should be separated from the self-improvement process, done more frequently (no less than every three years) and be focused on fully transparent metrics that examine critical outcomes, including student learning, completion rates and numbers, and successful transition of former students to the next step in their life. Furthermore, these metrics should provide information that allows external customers of this quality assurance process to know the difference between exceptional performing institutions (in comparison to their peers), average performing institutions (in comparison to their peers), below average but OK performing institutions (in comparison to their peers), and abysmal performing institutions.
In sum, the dilemma with modern accreditation is that it isn’t modern. The solution is not to abandon it but to change it into a contemporary approach to quality assurance. And, we can do it. We already do it within our community for non-core activities; surely we can do it for our core business.