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Assessment and Accreditation: An Imperiled Symbiosis

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Table of Contents

Preface . . .	3
Assessment and Accreditation: An Imperiled Symbiosis . . .	4
A Claim for Effectiveness . . .	6
The Indictment . . .	9
Proposals for Change . . .	11
How Accreditors Can—and Should—Respond . . .	14
What Lies Ahead . . .	19
References . . .	21

NILOA Mission

The National Institute for Learning Outcomes Assessment's (NILOA) primary objective is to discover and disseminate the ways that academic programs and institutions can productively use assessment data internally to inform and strengthen undergraduate education, and externally to communicate with policy makers, families, and other stakeholders.

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Preface

At a time when criticisms of accreditation make the headlines and political leaders offer bold recommendations for improving accountability in higher education, it may be difficult to recall that as recently as 2002 two prominent observers, Anne D. Neal and Jerry L. Martin, described accreditation as “a subject that is rarely discussed.” That’s far from the case now.

What has changed?

First, increases in the cost of a college education and the often overstated (Supiano, 2016) surge in average student debt have raised questions about value for money. Given reports of dismal degree completion rates, employer dissatisfaction with the graduates they are hiring, and dimming prospects for employment in some fields, a once unthinkable question is now routinely raised: is college worth the time and expense it requires? That is a question accreditation should be able to answer resoundingly. But from the perspective of its critics and self-appointed reformers, accreditation for the most part has failed to do so.

Second, accredited institutions and programs are themselves questioning the value of the system they support through their membership. In allowing its accreditation by the Accrediting Council on Education in Journalism and Mass Communications to lapse in May 2017, the journalism school at Northwestern University said the ACEJMC had not been “useful” (Rhodes, 2017). Accreditation processes require considerable time, attention, and expense, without—or so the complainers insist—offering much in return to those being reviewed.

Finally, these and other issues have created opportunities for opinion leaders who have found political advantage in pressing for greater “accountability” on the part of higher education and in calling for significant changes in accreditation. Those mentioned below share a belief that it is high time that higher education institutions and programs come clean regarding their quality, their efficiency, their cost-effectiveness, and their success (or lack of it) in fostering student accomplishment and employment. And if accreditation fails to ensure such transparency, radical changes are in order.

Because of their close symbiotic relationship, assessment and accreditation would both be affected by radical change. If we are at “a pivotal moment” for accreditation, as Judith Eaton (President of the Council of Higher Education Accreditation) has said, we are at such a moment with assessment as well. There are two questions that follow. First, are there ways in which accreditors and those invested in the effectiveness of accreditation might respond to the criticisms, enhance their performance, and serve both the accredited and the public more effectively? Happily, the answer is “yes.” Second, are accreditors and those who support accreditation prepared to acknowledge the legitimate criticisms, learn from creative proposals for change, and commit to undertaking reforms that clearly are needed? We can hope so.

For accreditation, 2016 will be remembered as an inflection point, a pivotal moment, a culmination of a multiyear revamping . . . The federal government, through the U.S. Department of Education, has consolidated its authority over accreditation. It is now the major actor directing and leading this work. Second, the public, whether members of the news media, consumer protection advocates, think tanks or employers, is now in agreement that the primary task of accreditation is public accountability. . . . Both the strengthened federal oversight and expectations of public accountability have staying power. They are not temporary disruptions. They will remake accreditation for the foreseeable future.

Judith Eaton, Inside Higher Ed, December 1, 2016

Assessment and Accreditation: An Imperiled Symbiosis

Paul L. Gaston

It would be an exaggeration to say that without accreditation, there would be no assessment. It would be more plausible to say that without assessment, accreditation as we know it would not exist. But it would not be an exaggeration at all to say that without accreditation, assessment would be less focused on learning, less useful to those whose activities are being assessed, and less sensitive to programmatic and institutional diversity. Similarly, if accreditation had not encouraged and embraced what we now call the “assessment movement,” its reliability in evaluating higher education and its usefulness to institutions and programs would have been significantly diminished.

That is an elaborate way to make the point that accreditation and assessment have enjoyed a symbiotic relationship and continue to do so. While the assessment movement may have been prompted initially by increased demands for accountability from state boards and trustees, its impetus since the 1980s has come largely from accreditation’s salutary embrace of assessment as a means of making evaluation more sensitive to institutional mission, more constructive, and more rigorous.

An early indicator of accreditation’s adoption of assessment as a principal evaluative element appeared in 1984 when the Southern Association of Colleges and Schools (SACS, now the Southern Association of Colleges and Schools Commission on Colleges, or SACSCOC) called on member institutions to demonstrate their “effectiveness.” Other regional accreditors soon followed. In 1994 regional accreditation and educational association leaders agreed on the need for “higher standards to improve colleges, focusing on teaching and learning” (Leatherman, 1994). Since then, requirements so far as assessment is concerned have become both more demanding and more practical. The brief chart below oversimplifies a complex history—but the broad trends it describes will be familiar to anyone with experience of accreditation and assessment.

Decade	Accreditor Expectations: Institutions and programs must . . .
1980s-1990s	Document their plans for assessment.
2000s	Show evidence that their assessment plans are operational and producing results.
2010s	Show evidence that assessment results are prompting improvements through their influence on planning, budgeting, and curricular design.

Table 1. Change in accreditor expectations of assessment over time.

There’s more to be done, of course, as accreditors aspire to even higher levels of intentionality. And more is being done. A 2010 NILOA study by Staci Provezis, *Regional Accreditation and Student Learning Outcomes*, found that

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- All regional accreditors concur that the public disclosure of learning outcomes assessment information represents an issue of institutional integrity.
- With one exception (as of 2014) regional accreditation associations call for faculty members to be engaged with learning outcomes assessment through the creation of learning goals and of strategies to link assessment and improvement.
- Through workshops, conferences, and published materials regional accreditors assist member institutions in planning and carrying out assessment of student learning outcomes.
- Perhaps most tellingly, each of the regional accreditors reports that deficiencies in student learning outcomes assessment are the most common shortcoming found in institutional evaluations.

Since 2010, further advances have appeared in terms of more explicit—and more principled—expectations. A few examples:

- SACSCOC calls on its members to document through assessment the extent to which students accomplish general education competencies.
- WSCUC expects that employers are “regularly involved in the assessment and alignment” of programs.
- ACCJC, having asked institutions to define “the end point learning outcomes that students must achieve in a course/program/certificate/degree” seeks evidence in the form of samples of student work and performance. Such samples are expected to indicate that these outcomes are accomplished and that the analysis of student attainment is improving the teaching/learning process.
- MSCHE’s Standard 14 describes four expectations that summarize the third stage of the above chart: (1) the development of “clearly articulated learning outcomes,” (2) the offering of a curriculum that provides “purposeful opportunities” for students to accomplish these outcomes, (3) the assessment of student learning outcomes, and (4) the application of assessment results to “improve teaching and learning and inform planning and resource allocation decisions.”
- NWCCU requires that its member institutions “identify and publish expected course, program, and degree learning outcomes” (2.C.2) that reflect “generally accepted learning outcomes” (2.C.3).

Many other examples might be cited—and many might be drawn from the sectors of specialized and national accreditation as well—but the big picture is the point. Notwithstanding institutional uses of assessment to achieve competitive advantages and mandates concerning assessment from the federal government and state agencies, by far the most powerful prompt for effective and productive assessment comes from the accreditation community. That has been the case for more than 40 years and is even more the case today.

Given the extent to which accreditation and assessment have become synergistic, it should be obvious that proposals for radical changes in accreditation—some of which pose existential threats to accreditation itself—have profound implications for assessment. The impact on assessment will of course depend on what changes take place. But for those who have experienced how assessment can enhance the effectiveness of institutions and programs,

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there is value in understanding both the environment that accreditation must deal with and some actions accreditors might want to consider when facing environmental hazards.

A Claim for Effectiveness

By many measures, higher education accreditation has been a success story—and a uniquely American one. In the value that accreditation assigns to the distinctive mission of a small college or that of a large research university, in the trust that it places in qualified peers for the review of institutions and programs, and in its commitment to provide not only accountability for the public but benefits for institutions and programs, accreditation reveals values that correspond closely to the nation’s traditional faith in individualism, principled self-scrutiny, and continuous improvement.

There are in fact instructive parallels between the history of accreditation and that of the U.S. In Colonial times, under a decentralized government, a largely unregulated approach to higher education sufficed. But as the nation gained its independence and grew rapidly through the nineteenth century, that was no longer the case. Questions arose. What *is* a college? How can we make college learning “portable”? How can we be sure funds are being wisely used? So there began a period of organization, consensus building, and agreement on standards. Similarly, it might be said now that current disagreements over what accreditation should do, what it should refrain from doing, and whether it should exist at all mirror seemingly intractable national disagreements on issues such as health care, taxation, and foreign affairs.

It should not be surprising therefore that accreditation has come under scrutiny. But before weighing the evolving indictment and considering how accreditors might, and perhaps *should* respond to calls for radical change, we should acknowledge what has been accomplished in just a bit more than a century.

Higher education accreditation is cost-effective, well organized to meet its obligations, and so successful in providing assurance of educational quality that it has increasingly influenced quality assurance throughout the world (Amaral, Rosa, & Tavares, 2008). And in comparison with many other kinds of organizations—philanthropic, educational, governmental—accreditation appears unusually efficient. Headquarters are characteristically modest. Staffs are small. Accreditation organizations conduct their evaluations by means of a sizeable cadre of peer reviewers, most of whom volunteer for training and assignment without significant compensation. A strong commitment to the continuing education of reviewers promotes consistency in evaluation, from institution to institution and from year to year. And thorough, sustained scrutiny of evaluation team members reduces the risk of conflicts of interest. As a result, though challenges to accreditation findings lead to headlines, the recommendations of accreditors are almost always accepted without objection.

There are good reasons for this. From its early emphasis on defining “what is a college” accreditation has evolved to respond to the needs of society and the academy. Minutes of the regional accrediting associations during the first decade of the 20th century all suggest an emerging consensus not only on how a college should be defined, but on how degrees should be categorized, which students should be admitted, and how they should be enabled to transfer.

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As institutions of higher education continued to proliferate and the diversity of their missions became ever greater, accrediting associations such as the North Central Association (now the Higher Learning Commission) moved gradually away from “specific standards that have to do with quantitative measurement” to “principles... much more general in character.” There were “wide variations... in the degree of excellence attained” by different kinds of institutions, the commission affirmed. Hence it would consider “the total pattern” of an institution “in terms of the purposes it seeks to serve” (Davis, 1945, p. 72).

In mid-century, accreditation responded to the challenges posed by the GI Bill (1944), the National Defense Education Act (1958), and the Higher Education Act (1964). Each expansion of educational opportunity offered further opportunities for fraud and, in each instance, the federal government called on accreditation to provide the necessary quality assurance. Those calling now for the “decoupling” of accreditation and federal funding (i.e. that accreditation be stripped of its “gatekeeper” authority for federal student aid) would do well to recall the circumstances that called for the granting of that authority in the first place.

Perhaps the most influential element in accreditation’s response to changes in society and in higher education has been the shift from a focus on “inputs” (institutional resources such as library collections, student/faculty ratios, and laboratories) to “outputs” (graduation rates, graduate earnings, and, most desirably, the accomplishment of learning outcomes). The shift was prompted in part by enrollment increases that strained resources, in part by the rise of the assessment movement, and in part by increasing demands for accountability. It became conspicuous in 1984 when SACS introduced the expectation that institutions demonstrate their “effectiveness.”

The resulting emphasis on teaching and learning has continued to grow. As Table 1 suggests, accreditors that once asked simply that institutions and programs declare their assessment plans now routinely ask that the influence of assessment information be documented. The Higher Learning Commission, for instance, demands explicitly that an institution show that it “uses the information gained from assessment to improve student learning” (Higher Learning Commission, 2017).

Given the ways in which accreditation has developed and the resourcefulness with which it has responded to the changing environment, it should not be surprising that accreditation has offered to higher education one of its most accessible platforms for innovation while sustaining the values that prompted its formation. For the past three decades, the increasing focus on outcomes has led to reviews that are both far more discriminating and far more useful to the institutions and programs reviewed. Few if any of those who claim that the system is rife with conflicts of interest have observed, much less experienced, the extraordinary steps accreditors take to guard against such conflicts. And there are many examples of programs and institutions that have become more effective as a result of the stimulus that accreditation can provide.

In 2016, the Council for Higher Education Accreditation (CHEA) published a persuasive two-page outline that summarizes “ten ways in which accreditation serves students, society, and the public interest.” By this view accreditation is

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(1) “the primary public symbol of legitimate higher education for over 100 years,” (2) a trustworthy gateway for governmental funding, (3) a “reliable authority” for private giving to higher education, (4) a source of “protection against fraud and abuse,” (5) a stimulus for innovation and a force for quality, (6) highly efficient and economical, (7) important for state licensure, (8) “essential to international mobility,” (9) a source of increased emphasis on institutional and programmatic accountability, and (10) “vital to maintaining key features of [U.S.] higher education that have contributed to the enterprise as among the best in the world.”

I suggest below that greater cooperation among regional accreditors could offer a key to their improved effectiveness and transparency overall. But the good news is that there is now clear precedent for such cooperation. Three recent examples of accreditor consensus concern nomenclature for accreditation actions, approaches to evaluating competency-based learning, and the importance of clear student learning outcomes. All reflect the work of the Council of Regional Accrediting Commissions (C-RAC) and, in particular, the collaboration of the seven regional accreditation executives.

The first, which clarifies nomenclature, means that for the first time critical terms such as “warning,” “probation,” “show cause,” “withdrawal of accreditation,” “denial of accreditation,” and “appeal” mean the same thing regardless of geography (C-RAC, 2014). While this reform might appear to be an overdue reach for low-hanging fruit, its importance for those attempting to make sense of the most consequential accreditation actions should not be underestimated.

The June 3, 2015, statement from C-RAC concerning competency-based education (NEASC-CIHE, 2015) offers agreed-upon terms, describes the “two principal approaches” of CBE (course>credit and direct assessment>credit), and sets forth standards for accreditor evaluation. These standards ask that programs emphasize performance (“not simply knowledge”), that they be “externally referenced,” that they provide opportunities for regular interaction with faculty, and that they achieve results relative to clearly defined student learning outcomes comparable to those of traditional courses. To qualify for recognition, a competence must be demonstrated at a level judged to be at or near the ‘excellent’ range.

Finally, a similarly heartening example of leadership and vision appears in C-RAC’s June 2016 statement (WSCUC, 2016) decrying “a narrow definition” of student outcomes focused on graduation rates, employment percentages, and education loan repayment rates. The regional accreditation commissioners call instead for “direct measures of *what students learn*.” The real issue, they say, is the extent to which students “achieve the broader knowledge, skills, and attitudes that are associated with being ‘an educated person.’” They point further to an emerging consensus as to “certain attributes and abilities of an educated person no matter his or her alma mater, no matter his or her major area of study.” References to influential expressions of this consensus such as the *Essential Learning Outcomes* published by AAC&U and the *Degree Qualifications Profile* published by Lumina Foundation would have been helpful, but the commissioners deserve credit for reasserting the importance of student outcomes that are in fact related to learning—rather than those focused on putative surrogates for learning such as employment earnings and loan payback. Perhaps most notable is C-RAC’s renewed endorsement of core learning that

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“will enable students to think critically, communicate effectively, integrate and apply their learning, and continue to learn as needed in relation to work, life, and civic participation.”

As promising as these initiatives are as precedents for further collaboration among the regional accreditors, their leisurely approach to reform makes it easy to understand why critics of accreditation have not been persuaded. A more urgent response appears overdue, one that would address telling criticisms with reforms that might be accomplished expeditiously without great expense. A modest commitment to increased efficiency, flexibility, transparency, and coordination would in fact enable higher education accreditors to meet their critics head on, serve their members more effectively, and make important contributions to higher education’s reclaiming the public trust.

There is a window for such an effort, but it is closing. In the quotation from *Inside Higher Ed* that concludes the Preface, Judith Eaton describes 2016 as “an inflection point, a pivotal moment, a culmination of a multiyear revamping...” During 2016 the federal government, having “consolidated its authority over accreditation,” had become “the major actor directing and leading this work.” In addition, the conviction that accreditation’s principal priority must be “public accountability” had taken root. These are not “temporary disruptions,” Eaton said. “They will remake accreditation for the foreseeable future.” But if there remains even a small opening through which to respond, we must understand what motivates the demands for greater governmental control and radical reform and consider what might be done to manage the trend.

The Indictment

A groundswell of opinion critical of accreditation has emerged. The literal meaning of the cliché is that of a large ocean wave prompted by a distant storm. In this case, the “large wave” is the current array of proposals for change, while the distant storm is the series of critical perspectives that have been moving across the horizon since the turn of the century. For instance, a national panel convened in 2005 by the Secretary of Education on “the future of U.S. higher education,” the “Spellings Commission,” found “significant shortcomings” and called for “a transformation of accreditation” (U. S. Department of Education, 2006, p. 19.) A report by the American Council of Trustees and Alumni the following year is bluntly titled, *Why Accreditation Doesn’t Work and What Policymakers Can Do About It* (ACTA Policymakers, 2007). An even more acerbic title, introducing an even more acerbic study, is the 2010 report from Richard Vedder and two colleagues at the Center for College Affordability and Productivity, *The Inmates Running the Asylum?* (Vedder, Gillen, & Bennett, 2010).

Even more ominously, in 2010 the inspector general of the U. S. Department of Education (USDE) renewed a call for sanctions on the Higher Learning Commission reflecting his 2009 “harsh assessment” of a lack of vigilance on the part of the HLC in monitoring the substance of awarded credit hours. The report in fact recommended consideration of “limiting, suspending, or terminating the organization’s status” (Kelderman, 2010, 2009). “Alternative” recommendations in the April 2012 report of the USDE’s National Advisory Committee on Institutional Quality and Integrity pronounced accreditation “a broken system” (NACIQI Final, 2012, p. 11). And in 2013 White House

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recommendations concerning affordability and student success envisioned the development of “an alternative to accreditation” (White House, 2013).

While these and other criticisms may differ from one to another in detail and tone, an overall indictment has emerged that may be summarized in terms of six broad elements. Accreditation (1) creates obstacles for new providers and discourages innovation, (2) fails to provide sufficient evidence of quality, (3) does not promote improvement in programs and institutions, (4) creates conflicts of interest, as those doing the evaluating are often closely connected professionally with the evaluated, (5) offers the institutions and programs that are reviewed little they find useful, and (6) gives unreliable guidance through its “gatekeeper” responsibility for institutional access to federal funds. The result—or so it is said—is that student aid continues to flow through poorly prepared and often unsuccessful students to the failing institutions that have aggressively recruited them. The assertion that accreditation is “broken” has become a familiar refrain.

A refrain invites casual singers to take up a song whether they are familiar with it or not. That is the case in this instance. Anyone who has followed accreditation over the years will know that while some of the charges may be valid, they just as often betray an inadequate awareness of how accreditation has evolved to address emerging challenges. The most strident critics have shown little appreciation for the genuine progress accreditors have made on many fronts: increasing the rigor and clarity of their standards, improving their efficiency, enhancing their flexibility, and heightening the value they provide.

But accreditation has not responded in ways likely to defuse the criticisms. Instead of disarming their critics by disseminating accurate information that makes conspicuous their commitment to improvement, accreditors have often chosen not to respond or have responded defensively. As a result, the influence on policy making of persistent—often unanswered—criticism has become apparent and is likely to become even more so in the near term. As noted below under “Proposals for Change,” at least two pieces of legislation, one from Sen. Marco Rubio (D-FL), the other from Sens. Warren (D-MA), Durbin (D-IL), and Schatz (D-HI) may exert influence even if they never reach the floor for a vote.

The political climate in the late spring of 2018 discourages predictions of the future. But it is possible to recognize vectors that encourage voices calling for change. The federal government’s “consolidation” of its authority over accreditation that Eaton describes may not expand further in the immediate future but probably will not be rolled back. And there has emerged no challenge to the assumption that public accountability represents the “primary task” of accreditation. Both ideas, as Eaton says (2016), have “staying power.”

A related vector is the recent activism of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Amber Sadler captured the change in the header for her July 14, 2016, *EducationCounsel* posting: “This Is Not Your Grandfather’s NACIQI.” Having joined the Department of Education committee just prior to the June meeting at which it recommended revocation of recognition for a large national accreditor of independent colleges and schools, she observed in the meeting overall a fresh emphasis on student outcomes, an impatience with staff attention to “minutiae,” an inclination to “more rigorous review” of accreditation agencies, and a strong interest in

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greater transparency between the legs of the quality assurance “triad” (states, accreditors, the federal government). A review of the most recent meetings, February 22-24 and June 20-22, 2017, suggests that Ms. Sadler’s impression was spot on. You can read what happened word-for-word at <https://sites.ed.gov/naciqi/archive-of-meetings/> (Sadler, 2016).

Another vector may (or may not) arise from the commitment to deregulation now being voiced by the current Secretary of Education, Betsy DeVos. While her enthusiasm is unquestionable, it is unclear whether her focus on K-12 education will broaden to include significant deregulation of higher education. Perhaps of greater moment will be the enduring discussion of downsizing or eliminating the Department of Education. We have heard that threat every so often since the Reagan administration with little perceptible result. This time may be different.

The next abrupt closing of an institution in the for-profit sector that results in televised footage of outraged students demanding restitution will likely prompt a further vector, one with two strands. One will convey strong support for more rigorous oversight of institutions coupled with increased scrutiny of accrediting associations. The other will come from for-profit institutions determined to protect themselves from just such oversight.

And we are likely to continue to see pressure exerted by the employer community for greater flexibility on the part of accreditors (to encourage start-up educational providers responsive to emerging industry needs), greater transparency (in actions taken and in the language used to describe them), and greater attentiveness (to the counsel employers can provide).

A final vector, which could prove to be the most powerful, appears in the necessity for legislation to reauthorize the Higher Education Act. As of late spring 2018, discussions of reauthorization were focused on a HR bill introduced in late December. A Senate bill was reportedly in preparation. While it appeared unlikely that legislation would clear Congress before fall 2018 elections, both the HR bill and discussions of a likely Senate bill carried clear implications for accreditation.

Predictions, anyone?

Proposals for Change

Although the list of publications since 2000 critical of accreditation is lengthy, the list of substantive proposals for improvement is short. A thorough publication-by-publication survey may be found in my 2014 book, *Higher Education Accreditation*, but for the purposes of this occasional paper, a list of the most prominent and influential ideas should suffice.

Accreditation, according to its critics, should:

- provide more extensive and reliable information to parents and students enabling comparisons among institutions,
- focus on educational results rather than “inputs,”
- avoid the promotion of any “political agenda,”
- ignore current regional boundaries so that regional accreditors would compete with one another for member institutions,

We are likely to continue to see pressure exerted by the employer community for greater flexibility on the part of accreditors (to encourage start-up educational providers responsive to emerging industry needs), greater transparency (in actions taken and in the language used to describe them), and greater attentiveness (to the counsel they can provide).

- relinquish “gatekeeper” responsibility for student financial aid,
- avoid intruding on arenas more properly the purview of institutional boards,
- engage additional public members in its review processes and its governance,
- create a fast track to accreditation for new, innovative colleges,
- provide greater transparency through the open publication of its findings and conclusions,
- introduce “grades” of accreditation in preference to the current “binary” system, and, most notably, either
- yield its role to a federal agency (perhaps one modeled on the Food and Drug Administration) or
- give way to qualifications frameworks at the program level.

According to Richard Vedder and his colleagues, either of these last two proposals—that for a federal agency or that for programmatic qualifications frameworks—would offer “massive improvement” in public information regarding educational quality. In addition, either alternative would enable institutions to enjoy greater autonomy, achieve savings in indirect costs, and find more space in which to experiment and innovate (Vedder, Gillen & Bennett, 2010).

Ideas that have become more and more conspicuous through a succession of provocative arguments are no longer confined to monographs. They have prompted initiatives and stirred proposals.

One 2016 presidential candidate, Marco Rubio, identified accreditation reform as a priority of his campaign. His bill for the 114th Congress (coauthored by Sen. Michael Bennet, D-CO) proposed “a voluntary, alternative system of accreditation for innovative education providers as well as existing colleges and universities” (Rubio, 2015). His approach would offer an alternate route for access to federal financial aid and make priorities of “high student outcomes” and “return on investment.” It is to Sen. Rubio that we owe the memorable characterization of higher education as a “cartel” (Fain, 2016).

And a bill introduced in the waning days of the 114th Congress by US Senators Elizabeth Warren (D-Mass.), Dick Durbin (D-Ill.), and Brian Schatz (D-Hawaii), proposed “steps to protect students and taxpayers by reforming higher education accreditation and strengthening the Education Department’s (ED) ability to hold accreditors accountable.” Echoing the refrain that accreditation is “broken” (Warren, 2016), the “Accreditation Reform and Enhanced Accountability Act of 2016” sought to “rebuild our college quality assurance system with stronger accountability to ensure that the federal government’s growing investment in higher education actually helps students access a quality, affordable education.” Because it would improve rather than replace the present system, the bill may appear less radical than that proposed by Sen. Rubio, but its potential impact could be greater. Such a bill, if passed, would give the Department of Education “more tools to hold accreditors accountable.” It would charge the department to develop and enforce minimum standards, in effect designating it as a primary accreditor. It would charge accreditors to focus more closely “on student outcomes and affordability.” And it would mandate an immediate intervention by accreditors “when there is evidence of colleges committing fraud.” Given that the sponsoring senators asked the Government Accountability Office to gather information on the current status of

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accreditation, it appears likely that some form of the bill will eventually be reintroduced. Speaking to the annual meeting of CHEA on February 1, 2017, Sen. Warren all but confirmed this as she itemized the bill's provisions one by one.

Beyond these legislative initiatives, there is an intriguing undertaking led by Ralph Wolff, who until his retirement in 2013 was president of the Western Association of Schools and Colleges Senior College and University Commission (WSCUC). Following his retirement, he launched Ralph Wolff & Associates, a consulting group, and took part in discussions to determine whether “something new and different was needed to make quality assurance more effective and responsive” (Wolff, 2017). The outcome was an initiative called the Quality Assurance Commons for Higher and Postsecondary Education, which focuses “not on another form of institutional accreditation..., but [on] the program level where students lead their academic lives” (Wolff, 2017). The web site (<https://theqacommons.org>) indicates that the organization is “exploring, developing, and testing alternative approaches of quality assurance that respond to the changing landscape of higher and postsecondary education and will serve the needs of learners, employers, and the larger society.”

A current priority of the Commons, “co-designing a new quality assurance model,” is focused on forging partnerships with institutions and programs to create and pilot a new quality assurance process emphasizing preparation for employment. As of August 2017, the Commons was working with about 25 programs from 13 different institutions. These partners, as well as the students and employers who are being consulted for advice, will enable the Commons to define “Essential Employability Qualities” (EEQs) that programs seek to deliver and that graduates should be able to demonstrate. By so doing, the Commons will be able to create a process for the certification of programs offering effective education leading to employment.

A thoughtful overview of this undertaking, “Piloting the ‘EEQ Certification,’” (<https://theqacommons.files.wordpress.com/2017/04/theqacommons-pilotinformation-5-9-17.pdf>) defines its challenge as one of bridging “serious gaps between higher education and employers.” Having pointed to widely available documentation of these gaps, the document adduces “six core principles” that emphasize substantive evidence of accomplishment. Perhaps the most notable element in the document is the statement of “essential employability qualities” that transcend baseline credentials for initial employment. The Commons vision of graduates of certified programs is that they will be “communicators; thinkers and problem solvers; inquirers; collaborators; adaptable; principled, responsible, self-directed, and professional; and learners.”

The document also offers broad examples of the kind of evidence that would be relevant to certification (e.g., student work, syllabi, survey findings) and lists questions that the pilot process is meant to address, e.g., “What are the most relevant and useful indicators of success for each criterion?”

In several respects—its sensitivity to employer concerns, its focus on employability and career success, its awareness of expressions of consensus regarding learning outcomes such as the *Essential Learning Outcomes* and the *Degree Qualifications Profile*, and its commitment to design the certification process in close collaboration with providers and other stakeholders—the QA Commons promises a fresh approach.

The QA Commons promises to attest to quality preparation in a broad range of disciplines through exercising a singular sensitivity to the evolving needs of students and employers.

It might be argued that programmatic accreditors such as ABET (engineering) and AACSB (business) already seek to bridge the gaps that the QA Commons has identified and that programmatic accreditation in these and other fields offers the “certification” that employers seek. However, the QA Commons promises to attest to quality preparation in a broad range of disciplines through exercising a singular sensitivity to the evolving needs of students and employers. The vision expressed in the prospectus for the pilot makes it easy to imagine why an education provider or employer would find added value in EEQ CERT even for programs accredited by reputable agencies. And that is the intent: to create “a complement to institutional accreditation—not a replacement” (Wolff, 2017).

Two other initiatives deserve brief mention.

The first is a USDE program meant to promote innovation in outcomes-based assessment and accreditation. Eight pilot programs, each of which links a college or university to a non-traditional educator, are providing financial assistance to students who are pursuing skills clearly aligned with current needs. The clever acronym, EQUIP, stands for Educational Quality (Through) Innovative Partnerships.

The other is a “Talent Pipeline Management” initiative by the US Chamber of Commerce Foundation. According to Jason A. Tyszko (2017), the Chamber is exploring “how employers can close the skills gap by leveraging lessons learned from supply chain management and applying them to education and workforce systems.” The objective is the creation of “a new and complementary quality assurance system that would address the needs of employers and provide new incentives for providers.” The question as Tyszko defines it “is whether an employer-led quality assurance system can better address the needs and requirements of employers while also producing the right benefits to encourage participation from all of the necessary stakeholders, namely the education and training providers that would need to work with such a system.” “Better,” that is, than traditional accreditation.

Of the current initiatives that seek to improve on accreditation through the development of alternatives, these may deserve particular attention.

How Accreditors Can—and Should—Respond

Although the future of accreditation lies to some extent in the hands of policy makers, there are significant improvements accreditors might make in an effort to disarm the more radical proposals for change. Coordinated reforms could add significant value to higher education and enable accreditation’s quality assurance allies to stand more resolutely in its defense.

Speak with one voice.

The first step towards genuine reform must be greater consensus, alignment, and coordination within *each* sector of accreditation. There is no longer any excuse for standards, protocols, and vocabularies that differ from one accreditor to another. Cultural and historical factors may explain but do not justify differences among the six regional accreditation associations, for instance. Such differences have become impediments to public understanding and incentive for

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radical reforms. Fortunately, as we have seen, the Council of Regional Accreditation Commissions (C-RAC) has published several expressions of consensus that suggest they are moving in the right direction. We can hope that the precedents they have set will lead to a full alignment of standards and processes.

National accrediting associations offer an even more confusing picture. To begin with, there are two varieties, those that accredit career-based institutions and those that accredit faith-based colleges. In order to counter the impression that such associations offer a last resort for institutions unwilling or unable to qualify for regional accreditation, those in both categories might define themselves less as advocates for the sectors they represent and more in terms of their shared commitment to quality assurance. In short, both career-based accreditors and accreditors of faith-based institutions, despite the differences in their respective constituencies, should be able to reach consensus on evaluative standards and protocols.

Specialized accreditors are of course the most distinctive. They evaluate nearly 100 disciplines from acupuncture (ACAOM) to urban planning (PAB). Although there are considerable differences among these accreditors related to their varying disciplines, the specialized accreditors have repeatedly demonstrated a salutary interest in consensus and transparency. One important reason lies in their organization, the Association of Specialized and Professional Accreditors (ASPA). With no clear equivalent in the other sectors, this organization represents its members, facilitates their conversations with one another, and provides a platform for the expression of shared values. The association's Code of Good Practice, adopted in 1995 and revised occasionally since then, articulates the priorities of accreditation in terms anyone can appreciate, sets forth standards for professionalism in accreditation practice, and expresses a commitment to "institutional independence and freedom in academic decision making." Particularly worth noting is the commitment to "cooperate with other accrediting organizations wherever possible to avoid conflicting standards and to minimize duplication of effort by the institutions and programs."

There is more that specialized accreditors could do to clarify and promote the benefits they offer to the academy and to the public. Their achieving and expressing a consensus on what a baccalaureate or master's degree should represent, regardless of discipline, would be enormously helpful. (An easy path to this end might lie through recourse to *AAC&U's Essential Learning Outcomes* and Lumina Foundation's *Degree Qualifications Profile*.) Still, what they have achieved represents an example that regional and national accreditors should consider.

Finally, in addition to achieving greater uniformity in standards and processes, accreditors within each sector should aspire to articulating the core values common to all accreditation processes and integral to quality assurance. That would not be difficult. Such values include programmatic or institutional assessment according to clearly identified and patently meaningful learning outcomes, the use of assessment results to strengthen programs and institutions, the sharing of information from assessment to guide students and others in making well-informed comparisons among programs and institutions, and the public disclosure of results that can be easily understood. Through a coordinated explanation of how accreditation works and why it is important, accreditors could also make clear to the public the advantages offered by what remains of

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their independence from federal control.

In the light of how little has been accomplished so far in terms of greater consistency *within* the sectors of accreditation, it may appear unrealistic to suggest also that there should be greater consistency *among* these sectors. But there must be. So long as “accreditation” refers to six regional associations, eleven national associations (four “faith-related,” seven “career-related”), and 67 programmatic accreditors, with a considerable variety of standards and approaches within each of the sectors, policy makers and the public will continue to gravitate towards simplistic reforms likely to undermine the quality of U.S. higher education. What is needed is a coordinated effort, led, perhaps, by the Council for Higher Education Accreditation, to bring about a far greater degree of consistency both within and among these sectors.

Accreditation should become more efficient, more agile, and more creative.

Accreditation in general, but regional accreditation in particular, stands accused of cumbersome procedures that inhibit the development of fresh approaches to the delivery of learning, that express the assumption that “one size fits all,” and that embody the Seven Last Words of moribund organizations: “But we’ve always done it that way.” While there is some truth to these accusations, there are important indications of movement in the right direction.

For one thing, accreditation in all its forms offers higher education its most accessible and most highly visible platform for sharing and encouraging innovation. Consider the summons to the 2017 Academic Resource Conference of WSCUC, which “calls on...institutions to highlight and reflect on their missions, and to share approaches for future mission fulfillment and vitality” (WSCUC, 2017).

For another, accreditors have made considerable gains in efficiency. There is now far greater reliance on the use of technology to gather and report information at the institutional or programmatic levels. But an opportunity for even greater efficiency might be found in a reconsideration of just what indicators are really essential to the documentation of quality. Fewer, more clearly revealing criteria would allow programs and institutions to focus more closely on what really matters, and reporting, in turn, could offer to a skeptical public more persuasive assurances of educational quality.

Accreditors continue to make gains in flexibility as well. There is an increasing understanding that differences among programs and institutions call for differentiated approaches to accrediting them. But if there were to be even greater flexibility, traditional comprehensive programmatic or institutional visits might be reserved for programs and institutions whose annual reports indicate either a heightened need for scrutiny or an opportunity to benefit from such a review. Programs or institutions continuing to demonstrate their effectiveness would thus find relief from laborious and intrusive periodic oversight.

The emphasis on agility and creativity is made all the more urgent by the proliferation of non-traditional providers. Accreditors could expedite their processes leading to recognition without any sacrifice in reliability. Greater consensus among accreditors would be helpful here also.

Accreditors continue to make gains in flexibility as well. There is an increasing understanding that differences among programs and institutions call for differentiated approaches to accrediting them.

Coordination is urgently needed. Working together, accreditors could scrutinize their application processes with an eye to reducing time spans, eliminating redundancies, and lowering costs—all without compromising standards. The long ramp from application to accreditation must be shortened, but an elementary physics principle applies: shorter ramps are necessarily steeper and require just as much work.

Accreditation should become more decisive and more transparent.

Decisiveness and transparency are synergistic.

Given the human costs when programs or institutions collapse, an outcry insisting on greater diligence and decisiveness is not surprising. As noted above, the bill proposed by Sen. Warren and her co-sponsors calls specifically for an accreditor's immediate intervention if evidence of fraud should surface. And the NACIQI recommendation in June 2016 to withdraw recognition from the Accrediting Council for Independent Colleges and Schools (ACICS) (USDE, 2017) charged that the accreditor had been dilatory in responding to indications of impending institutional failure at the for-profit Corinthian Colleges. (In April 2018, the Department of Education announced that it would reconsider its decision to revoke the federal recognition of ACICS.)

Similar concerns have supported the call for greater transparency, because the public has a right to be informed at once when there is evidence of institutional or programmatic malfeasance or weakness. In a broader sense, the public has a right also to understand how the standards and procedures of accreditation serve the public interest. Some accreditors, such as the WASC Senior College and University Commission (WSCUC), have made real progress. In addition to information that has long been available (institutional location, degrees offered, and the schedule for accreditor review), WSCUC since 2012 has made available the team reports and Commission action letters (WSCUC, 2013). But positive efforts here and there have far less influence on the public narrative than a coordinated effort across the board would have.

Synergy? Decisiveness without transparency will limit the impact of prompt action and sacrifice gains in credibility, while transparency without decisiveness will simply enable the critics to strengthen their indictment.

In practical terms, an emphasis on transparency and decisiveness also should require institutions and programs to address identified deficiencies promptly. More expeditious processes of appeal might even enhance fairness. A more nimble approach to due process may increase the likelihood of denials, but shared standards and comparable processes should make it easier to argue that negative decisions reflect logical, clearly stated processes and principles. This important reform can and should incorporate recognition of the occasional need for confidentiality, but the circumstances requiring exceptional discretion should be carefully defined.

A commitment to greater transparency might prompt also a restructuring of the team report to provide a more inviting and informative guide for readers seeking differentiation among institutions or programs. Such information could prove far more useful than deservedly suspect rankings. And the candid recognition of institutional or program issues might enable colleagues at insti-

Decisiveness and transparency are synergistic.

tutions facing similar challenges to create an alliance for tackling them. Indeed, if a particular issue were to appear with increasing frequency, the academy as a whole might mobilize to address it.

The advantages to be found in more transparent reporting on institutional and program strengths and priorities could also mitigate criticism of the so-called “binary” approach: you’re either accredited or you’re not. The risks of replacing this simple system with one that assigns institutions and programs to “levels” or “grades” of accreditation are considerable. But many of the advantages that a graded system might offer could be accomplished through clear, detailed publication of strengths and concerns.

Two issues remain to be considered in the light of decisiveness and transparency: the “gatekeeper” role certain accrediting organizations accept with respect to Title IV funds and the vulnerability of volunteer consultants who participate in contentious reviews.

The first may be addressed provisionally. Notwithstanding strong proposals to strip federally recognized accreditors of their “gatekeeping” responsibilities, this compact between the Department of Education and recognized accreditors remains the most efficient, economical, and secure means of regulating access to federal funding. As accreditation achieves a stronger reputation for decisiveness and transparency, the interest in creating another bureaucracy to monitor federal spending on education should dissipate.

The second? In brief, greater consensus on standards and procedures, increased efficiency, more agility and creativity, and improved decisiveness and transparency would make both accrediting organizations and their volunteers less vulnerable to litigation. If the accrediting community were able to agree on comparable procedures and processes of appeal grounded in the experience of its members and in expert legal advice, the likelihood of “due process” challenges might also be reduced. And if more decisive and expeditious judgments should raise concerns regarding procedural fairness, the accreditation community’s agreement on comparable (and comparably transparent) procedures should address them.

Accreditation should provide leadership reflecting a shared vision.

With the rise of student debt and a corresponding increase in defaults on student loans, the pressure on accreditation to concentrate on false quality surrogates such as graduate earnings and loan repayment rates continues to increase. But accreditors are pushing back. I mention above the June 2016 statement from C-RAC (WSCUC, 2016) that sets forth a consensus on core learning. Yes, it is disappointing that the accreditation leaders double down on a long-standing source of confusion and misunderstanding: “Terms for what is expected and the way in which expectations are expressed by the seven regional accreditors may and do differ.” But as similar collaborative efforts among the regional accreditors continue to mature, a compelling shared vision might be achievable.

What might be the elements of such a vision?

The advantages to be found in reporting on institutional and program strengths and priorities could also mitigate criticism of the so-called “binary” approach: you’re either accredited or you’re not.

First, the C-RAC accreditors might expand their statement to offer more guidance to their member institutions on what meaningful outcomes statements should look like. Again, the *Essential Learning Outcomes* of AAC&U and the *Degree Qualifications Profile* can offer useful guidance. And the many resources available at the National Institute for Learning Outcomes Assessment, the publisher of this monograph, offer important support.

Second, accreditation must continue to concern itself with the *coherence* of education, a concept that far transcends the aggregation of sufficient credits to prompt an award of credentials. Education and accreditation have always been about offering to students what they need to prepare themselves for *success and advancement* in their careers, for *self-awareness and satisfaction* in their lives, and for *engagement and service* as citizens in a democracy. The means to this end remain what they always have been: a curriculum defined by clear learning goals and structured to provide a coherent cumulative experience. An emphasis on competencies (rather than credit hours) as the measure of such experience can advance such a vision, but such competencies should add up to accumulated wisdom, not simply accumulated credits.

Finally, accreditation must continue to weigh in on the side of the public good. Even in the current environment, there remains considerable support for the multifaceted value of higher education to the individual. What must be restored is the conviction that higher education benefits the welfare of the nation. That is the issue the HLC raised in its January 2013 publication of revised “Criteria for Accreditation and Core Components” (Higher Learning Commission, 2017) which now appears as Criterion 1.D. Three statements clarify an important expectation. First, what an institution does must “reflect an understanding that in its educational role the institution services the public, not solely the institution.” Second, an institution must give higher priority to its “educational responsibilities” than to “other purposes, such as generating financial returns for investors...or supporting external interests.” Finally, the institution must be able to show evidence of engagement with “its identified external constituencies” (Higher Learning Commission, 2017).

Accreditation must become more efficient, more agile, and more transparent—and remain higher education’s most powerful advocate. But such change will avail little unless accreditors continue to promote a liberal and principled vision of higher education that is student-centered, aware of national needs, and grounded solidly in assessment. Only through their pursuit of such a shared vision will accreditors help to preserve that larger vision that has guided educators and the nation for more than 200 years.

What Lies Ahead

If strengthening higher education accreditation were not complicated, much more already would have been accomplished. Indeed, many obstacles lie in the way. Policy makers often appear to misunderstand the present reality of accreditation and so urge reforms implemented long ago or ones unlikely to lead to genuine improvement. Institutions and programs may object to what they regard as greater intrusiveness while attributing to accreditors increases in oversight that are in fact prompted by government mandate. And, like many other organizations, accrediting associations may prefer the *status quo* or take satisfaction in their singularity.

With the rise of student debt and a corresponding increase in defaults on student loans, the pressure on accreditation to concentrate on false quality surrogates such as graduate earnings and loan repayment rates continues to increase.

In my 2014 book, I asked what accreditation would look like in, say, 2020, if genuine reform were to occur. The questions and answers have evolved since then, but there are a few constants. Arguably, by achieving and communicating an easily understood consensus and becoming more focused and efficient, accrediting organizations could reclaim their once unquestioned role as effective guarantors of educational quality and sustainers of educational values. Perhaps as a result, misunderstandings, such as the often-repeated charge that accreditors “count the books in the library” instead of focusing on outcomes, will no longer influence opinion leaders.

But the more important questions concern not accreditation, which is after all only a means to an end, but the effectiveness of higher education.

- Would more effective accreditation enable more students to make their way to institutions and programs better suited to their interests and needs?
- Would more students benefit from transparent articulation of cumulative learning outcomes and thus persevere to earning a degree?
- Would more employers discover in the graduates they hire the knowledge, skills, and aptitudes they seek?
- Would society benefit from the civic and cultural education graduates have received in the course of their career preparation?
- Would the public once again embrace higher education as a public good?

If higher education accreditation bodies apply themselves to addressing these questions—and do so aware of their symbiotic relationship with assessment—the future for accreditation and assessment—and for higher education—may indeed be promising. Otherwise, to refer to the future as “uncertain” may be optimistic.

Accreditation must become more efficient, more agile, and more transparent—and remain higher education’s most powerful advocate.

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About the Author

Paul L. Gaston is the author of several works on accreditation, including *Higher Education Accreditation: How It's Changing, Why It Must* (2014) and a spring 2017 white paper on accreditation for the Association of American Colleges and Universities. A few elements of these documents have been incorporated within and adapted for this paper.

About NILOA

- The National Institute for Learning Outcomes Assessment (NILOA) was established in December 2008.
- NILOA is co-located at the University of Illinois and Indiana University.
- The NILOA website contains free assessment resources and can be found at <http://www.learningoutcomesassessment.org/>.
- The NILOA research team has scanned institutional websites, surveyed chief academic officers, and commissioned a series of occasional papers.
- NILOA's Founding Director, George Kuh, founded the National Survey for Student Engagement (NSSE).
- The other co-principal investigator for NILOA, Stanley Ikenberry, was president of the University of Illinois from 1979 to 1995 and of the American Council of Education from 1996 to 2001.

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