Accreditation: A Value-Added Proposition

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Let's begin our discussion by thinking about the process of accreditation in general and examining whether it is a transactional or value-added activity. At the same time, we need to consider if the assessment it represents is more closely related to a measure of accountability or a means of improvement.

In a transactional process, accreditation is simply a means to an end. An institution or program demonstrates that it meets the standards established by the appropriate industry. If it demonstrates through a self-study report and peer review that it meets the standards, it is awarded accreditation. At that point, the report and the data collected may be shelved until the next cycle when the process begins again. The entity has been found accountable to established standards, and its work continues often unchanged.

If accreditation is a value-added proposition, on the other hand, it goes beyond simple accountability. The institution analyzes the data to examine its current status and critically inform its future practice. While striving to meet industry standards, the organization also recognizes the potential of the process to impact its internal effectiveness. It fully embraces accreditation as a process integral to its growth.

These two lenses for thinking about accreditation closely mirror the two paradigms of assessment suggested by Peter Ewell (2009): the improvement paradigm and the accountability paradigm. The former is underscored by its emphasis on formative assessment that is internally focused with an ethos of engagement. The latter is summative and framed by its judgmental nature that is externally focused with an ethos of compliance.

As we review the overall systems of U.S accreditation and NADE accreditation, let's keep these two processes and paradigms in mind. Let's critically reflect on the accreditation processes this article describes and decide if one is emphasized more than the other and where they converge.

Overall U.S. Accreditation

Today, in the United States, for an institution of higher education and its students to receive federal monies, it must be accredited by a regional or national agency recognized by the federal government. The process of gaining institutional accreditation is built around a set of standards

created by an accrediting agency. The criteria are first examined through an institutional self-study and then reviewed by a team of external peers created and trained by the accrediting agency. The outcomes of this external review include accreditation/re-accreditation for up to ten years, sanctions/warnings or denial/termination (Kelchen, 2017). Normally, the one outcome that demands a plan for improvement is when a sanction or warning is issued. This seems more punitive than value added.

Looking at this process through the lenses described above, our initial impression is that accreditation is based on standards designed to hold institutions accountable to an external agency for obtaining funding from the federal government. There is little incentive under most circumstances to use the data gathered to inform decision making. Unfortunately, this often spawns a transactional process that is more concerned with accountability than improvement.

Has it always been this way? Accreditation wasn't always linked to the federal government. In the late 1800s, there was a proliferation of educational institutions including normal schools, junior colleges, technical schools, and secondary schools. Postsecondary institutions needed a way to define what a college was and to determine standards for admission and completing a degree (Harcleroad, 1980). This led to the development by educators of regional associations to create and certify standards. The subsequent process of accreditation was voluntary and driven by educators. The outcome was the creation of a list of approved institutions. This list became very prestigious and sought after, and institutions began gathering descriptive data to ensure they were included. Thus, the process of accreditation, even before its ties to the federal government, began to be transactional and tied more to accountability than improvement.

It was not linked to federal funding until after the GI Bill when veterans were offered tuition support from the government. That eventually led to the Veterans Readjustment Assistance Act in 1952, when the government tasked accrediting agencies with ensuring that institutions met minimum quality standards (Conway, 1979). The government became interested in the work of the various accrediting agencies and in 1979 expanded the purposes of accreditation with its list of nine criteria for agency recognition. One of the criteria was "creating goals for self-improvement of weaker programs and stimulating a

general raising of standards among educational institutions" (1979, p.1). In a very general way, this may have led to a focus on a value-added approach to accreditation. It also led, however, to the challenging merger of a process of self-regulation with one of federal oversight (Legon, 2017). Some would argue that this has led to a model that is more driven by accountability than value-added.

Until the 1980s, the following general standards were used to evaluate an institution's quality: mission, governance, financial health, and academic resources. As we can see, these are essentially inputs to the institution and not directly related to outputs that result from teaching or learning: Academic resources were measured by data that described such things as the number of books in the library, number of faculty and facilities. An institution could best meet the standards by adding volumes to the library or increasing the number of faculty. Indeed, these elements were assumed to be linked to learning and thus could be considered part of a process of improvement rather than simply accountability, but there was little mention of the student-centered mission of higher education or outcomes. The criteria still seemed to be leaning toward overall accountability and a summative measure of quality. The measurement tools were quantitative rather than a combination of quantitative and qualitative which underscore the overall accountability focus (Ewell, 2009).

The accreditation process was not yet looking at teaching and learning as quality measures for the institution, nor was it asking institutions to analyze the data it collected to inform decision making that could improve its effectiveness. It was not critically examining the core purpose of higher education: To educate its students and to provide evidence of their learning outcomes, a value-added concept.

It was not until thirty years later that the government required student learning outcomes to be added to the process. Despite this new requirement to address learning outcomes, a report in 2015 showed that colleges were more likely to lose accreditation for financial reasons than academic reasons. This report was followed by an article that reported 11 regionally-accredited four-year colleges had graduation rates below ten percent (Kelchen, 2017). Clearly, no one was really paying attention to learning outcomes as a significant marker for accreditation purposes. This was somewhat adjusted in 2016 when regional accreditors set new standards for graduation rates (Kreighbaum, 2016). The new standards, however, were not clearly outlined and pretty much left up to the accrediting agency (Ewell, 2010).



More recently, regional accrediting agencies like the Higher Learning Commission (HLC) have focused more on teaching and learning with student outcomes playing an important role. Its five criteria for accreditation now include: Mission, Integrity, Teaching and Learning: Quality, Resources and Support, Teaching and Learning: Evaluation and Improvement, and Resources, Planning and Institutional Effectiveness. It is significant to note that teaching and learning have become two integral components of the HLC accreditation process (Higher Learning Commission, 2014).

With teaching and learning now comprising two of the five criteria for accreditation, the focus necessarily includes student learning outcomes and has greater potential for becoming a value-added process. Through these two criteria, HLC is asking its institutions to demonstrate specific qualities such as

- The exercise of intellectual inquiry and the acquisition, application, and integration of broad learning and skills are integral to its educational programs,
- Provides support for student learning and effective teaching
- Evaluates the success of its graduates,
- Uses information on student retention, persistence and completion of programs to make improvements as warranted by the data, and
- Processes and methodologies for collecting and analyzing information on student retention, persistence and completion of programs reflect good practice.

(An added note in the HLC policy here states that institutions are accountable for the validity of their measures.)

This represents a shift in focus to one of assessment and analysis which can drive accreditation toward more of an improvement model. Institutions accredited by the HLC are being asked to not only report data on student learning but HOW they use that data to improve their programming. What does this mean for the accountability approach? Ewell asserts that there will always be a tension between the two approaches but that one should not preclude the other. He urges all accreditors to separate compliance from deep engagement activities and for institutions to utilize the data they collect to identify deficiencies while at the same time producing summary benchmarks that meet compliance criteria.

NADE Program Accreditation

How does NADE program accreditation fit into the overall concept of accreditation and its various paradigms? How does it add value along with accountability to an institution's accreditation process? From the beginning, the NADE process has been one of self-regulation that encouraged teams of educators to deeply engage with the data from their programs. The primary goal was never compliance with standards for the sake of external accountability. Instead the goal is to facilitate a value-added process where "unique strengths and weaknesses" are uncovered through a reflective, evidence-based process. The Accreditation Commission encourages applicants to approach the process with a goal to "improve your program rather than protect it" (NADE Accreditation, 2017)).

As we saw in the earlier descriptions of institutional accreditation, too often data are gathered simply for accountability purposes. They are frequently summative in nature and do not reflect a continuous process of assessment. This does not align easily with an improvement model. In NADE's *Required Parts of Application* document (2013), it asserts that programs under review, "...are effectively engaged in the process of continuous and systematic assessment and evaluation" (p. 1). This approach fits well with Ewell's principles for easing the tension between accountability and continuous improvement.

Let's examine NADE's approach through the framework of his "Principles of Response" (2009, p. 14). He constructed these to provide guidance for those seeking to balance external accountability and evidence-based continuous improvement.

1. Respond visibly to domains of legitimate external concern.

In recent years, developmental education with its multiple components (coursework, tutoring, and course-based learning assistance) has come under attack from multiple sources. With state and federal support for postsecondary education decreasing, institutions are looking for ways to cut costs. Often the first place to cut includes student support systems such as academic assistance. At a time when increasing revenues is important, institutions look at the short term and may decide to cut developmental coursework or decrease funds for tutors. This, of course, does not consider the potential loss of tuition when students who need assistance drop out. Some state systems have phased out what they call remedial education from their four-year institutions or legislated significant reductions. Twenty-two states have reduced or eliminated developmental coursework from their public colleges and universities (Parker, 2007). In Florida and Colorado, for instance, students in public colleges can now avoid developmental classes and enroll directly in college-level courses regardless of their placement test results. Connecticut restricts separate developmental coursework to one semester per student (Lu, 2013).

While funding is decreasing, the need for academic assistance programs continues to increase. More diverse students are coming to college; often they are older and need to brush up on skills learned earlier. This population is expected to increase (NCES Fast Facts, 2011). They may also be coming from a range of secondary schools with varying amounts of academic preparation. Boylan and Goudas (2012) describe students placed into remediation as "disproportionately characterized by known risk factors such as being minority, low income, first generation and underprepared" (para.10).

Clearly there is a realistic need for developmental education programs to collect, analyze and disseminate the data that show how effective their academic support systems are. These data will not only help their institution demonstrate the overall value they add to a student's education, but they also make a significant case for additional resources through an important measure of accountability. The data gathered has the potential to make the institution appear proactive to the needs of its students and to assume a "collective responsibility" for their success. (Ewell, p. 15) This is a legitimate external concern that needs to be addressed.

2. Show action on the results of assessment.

Ewell contends that institutions often do not know how to implement evidence-based continuous improvement. He suggests that this is a result of the historical precedent of utilizing assessment data for compliance purposes. His suggestion for providing opportunities for the "thoughtful, collective reflection about evidence" (Ewell, p.16) is exactly what the NADE model accomplishes.

NADE states in the overview of essential actions that, "...the Accreditation process and the thoughtful analysis it is intended to stimulate are not linear in action" (p.5). Indeed, it emphasizes the significance of the active engagement of the self-study team and encourages the inclusion of as many stakeholders as possible. It goes on to assert: "Potential insights into areas of strength as well as areas needing improvement are enhanced by the differing perspectives offered by a diverse self-study team" (p. 6)

In addition to the creation of a strategic, actively engaged team, the NADE process requires evidence of the data being used to inform a cycle of continuous and systematic assessment. The 8th step of the process for developmental coursework accreditation states, "Using the baseline data analysis, coupled with the prioritized list of areas needing improvement, formulate the action plans intended to improve services to students and/or impact student success" (p.7).

NADE ensures that its process is a model for the value-added approach to accreditation. It not only requires a thoughtful analysis of data, but the self-study team must create an action plan that clearly spells out how the data will inform its next steps. This study will not be put on a shelf; rather, it will proactively guide the program to continuously improve. This is a model not only for a specific institution but for U.S. accreditation in general.

3. Emphasize assessment at the major transition points in a college career.

There is a significant data component to the NADE process that requires a minimum of four academic years of consecutive data that includes at least two years of baseline data plus two years of comparative data (p.14). Since developmental education programs typically occur at the beginning of a student's educational experience, descriptive data are initially collected to provide an overall picture of the incoming cohort and whether its students follow advice related to learning assistance and their subsequent performance. It is also important to note that not only is successful completion of the developmental component assessed, but additional measures are built in throughout their path to college completion. For instance, grades and/or completion rates in subsequent college-level courses are tracked as well as retention rates through the second year. The process for advanced accreditation also suggests the inclusion of comparative data that looks at the institution's overall student success data versus that of the students placed into a developmental program.

The multi-year baseline and comparative data provided through the NADE accreditation process have the potential to be valuable resources to the institution in general when it examines its overall admissions, persistence and retention rates. These are, indeed, major transition points where data can inform practice.

4. Embed assessment in the regular curriculum.

Too often assessment is an afterthought, and measurement tools are only employed at the conclusion of a program to evaluate the end results. The data that result from such an approach cannot accurately assess where the program succeeded and where it might need to be improved. Successful programs build in evaluation from the beginning by analyzing formative measures along the way to determine if the goals and objectives are being met.

To apply for NADE accreditation, a team must provide two years of baseline data collected before implementing an action plan for improvement. Following the action plan, the team collects data for another two years documenting the effectiveness of the plan. These data necessarily reflect more than simple end points. They examine patterns and multiple points of evaluation and align with the overall goals and objectives of the program. The fundamental question that guides the data templates for developmental coursework accreditation is, "To what extent is the developmental coursework program component using continuous and systematic assessment and evaluation to improve the services it provides" (p. 13). The expectation is that assessment is an integral part of an effective program and embedded throughout.

NADE's accreditation process clearly fits into a value-added approach that encourages program improvement through formative assessment and thoughtful analysis of data. Its evidence-based model ensures that programs and their outcomes will be critically examined and continuously evaluated. NADE recognized the significance of this model from the start and is well positioned to be an integral component of any institution's overall accreditation process.

As the graphic below demonstrates, the NADE accreditation process adds a significant component to at least two of the HLC components, teaching and learning, that we examined earlier. Its robust collection of data related to student outcomes has the potential to strengthen any institution's self-study process.

In addition to the significant value it adds to the teaching and learning components through its formative data, the NADE process also supports the accountability needs of an institution's accreditation with its summative data. At the very least, it has the potential to amplify the mission or integrity components of the overall accreditation process. The formative and summative data analyzed by the NADE self-study team both underscore the institution's commitment to meet the needs of its students.



In summary it is evident that although there is a tension between a value-added approach to accreditation and one that is simply undertaken to demonstrate accountability, there can be a healthy overlap. They are not and should not be exclusive processes. In the field of developmental education, we approach accreditation the same way we approach our students: We are interested in continuous improvement and formative development. We are also willing to be held accountable for our students' success and completion of their goals. That is what drives us to collect and critically analyze data that will continuously inform our decision making.

We are confident that our model will remain primarily focused on a value-added approach while also holding us accountable to rigorous standards and serve as a model to other accreditation models that have not yet reached that point.

References

- Boylan, H.R. & Goudas, A. (2012, June 19). Knee-jerk reforms on remediation. *Inside Higher Education*. Retrieved from http://www.insidehighered.com/views/2012/06/19/essay-flawed-interpretations-research-remedial-education
- Conway, M. M. (1979). The commissioner's authority to list accrediting agencies and associations: Necessity for an eligibility issue. *Journal of Higher Education* 50(2), 158-70.
- Ewell, P. (2009). Assessment, accountability and improvement: Revisiting the tension. Occasional Paper #1. National Institute for Learning Outcomes Assessment.
- Ewell, P. (2010). Twenty years of quality assurance in higher education: What's happened and what's different? *Quality in Higher Education 16*(2). 173-175.

- Harcleroad, F. F. (1980). Accreditation: History, process and problems. AAHE-ERIC/Higher Education Research Report No. 6.
- Higher Learning Commission. (June, 2014). Criteria for accreditation, CRRT.B.10.010. Retrieved from http://policy.hlcommission.org/Policies/criteria-for-accreditation.html.
- Kelchen, R. (September, 2017). *Higher education accreditation and the federal government*. Elevate the Debate. Washington, D.C.: Urban Institute.
- Kreighbaum, A. (2016, September 21). Tougher scrutiny for colleges with low graduation rates. *Inside Higher Ed*, https://www.insidehighered.com/news/2016/09/21regional-accreditors-refocus-institutions-low-grad-rates.
- Legon, R. (May, 2017). Accreditation: Transactional or value-added? The Future of Accreditation: The 20th Year Opinion Series, Issue 5. Washington, D.C.: Council for Higher Education Accreditation.
- Lu, A. (July 25, 2013). *States make changes to college remedial education*. Retrieved from www.governing.com. Stateline: Service of the Pew Center on the States.
- NADE Accreditation: Required parts of application. (2/17/17). Retrieved from www.nadeaccreditation.net
- National Center for Education Statistics. (2012). Fast facts. Alexandria, VA: U.S. Department of Education. Retrieved from http://nces.ed.gov/fastfacts/display.asp?id=98
- Parker, T.L. (2007). Ending college remediation: Consequences for access and opportunity. ASHE/Lumina Fellows Series, Issue 2. Las Vegas, N.V.: Association for the Study of Higher Education. Retrieved from ERIC database. (ED 530578).

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