

Higher Education Accreditation: How Can The System Better Ensure Quality and Accountability?

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Testimony

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Dr. Wallin is the author of *By Ships Alone: Churchill and the Dardanelles*, co-editor (along with Glen E. Thurow) of *Rhetoric and American Statesmanship*. He served as associate editor (with Robert Wesson) of a series of volumes on emerging democracies published by the Praeger Press (*Democracy in the World*; 1987-89). In addition to publishing a number of articles and reviews in his field, Dr. Wallin has written on liberal education in the thought of Robert M. Hutchins in *Notes et Documents* (Rome, 1993), and also in the thought of Mortimer Adler, in *The Aspen Papers* (Chicago, 1995). Dr. Wallin received his Ph.D. and M.A. from the Claremont Graduate School and his B.A. from Pepperdine College.

Testimony of Jeffrey D. Wallin

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Before the U.S. Senate Committee on  
Health, Education, Labor and Pensions

26 February 2004

Thank you very much for having me here today.

Higher Education in this country is on the road to becoming ubiquitous. This is in large part due to the efforts of many at the state and national levels to provide access to student populations that had not previously attended college. However, in the last two decades serious questions have been raised about whether the quality of higher education has kept up with its growth in access and in expense. Report after report have confirmed what every professor privately groans to himself: the qualifications for success in higher education cannot be reduced to mere native intelligence and ability; almost as important are the skills that we used to take for granted in any high school graduate, but which now are sadly lacking in all too many entering and returning students.

I do not mean to imply that this problem has in any way come upon us unexpectedly. Most of us are familiar with Walter Lippmann's complaint that the modern world has "established a system of education where everyone must be educated, yet [where] there is nothing in particular that an educated man – he meant men and women – should know." But this was preceded by many other observations of the sort, including Winston Churchill's that "education is at once universal and superficial." It is our duty and our responsibility to do what we can to preserve this newly won access to higher education while resisting any increase of superficiality or lowering of quality.

Considerable pressure has been brought to bear on higher education to account for the rising costs of higher education that have accompanied its growth; this, coupled with repeated revelations of what is not being learned at the undergraduate level has resulted in the rapid spread of learning assessment in recent years. Since funding provides one of the few levers by which one may attempt to prod higher education, accreditation, which acts as a "gatekeeper" to federal funds, has been required by law to develop or at least monitor outcomes assessment at its member institutions.

Historically, AALE has been a proponent of educational assessment, and while we remain a proponent, we believe that assessment has been taken as far as it reasonably can be taken by institutional or regional accreditation.

The American Academy for Liberal Education was established in part to strengthen general and liberal learning by establishing substantive academic accreditation standards, such as foreign languages, mathematics, history, philosophy, science, and so on. While we believe there is much to say for this approach, we are aware that it speaks only to the input side of the learning equation, not to the output side, and thus have spent a good deal of time in assessing student outcomes as part of moving accreditation from an almost exclusive concern with resources to a system also concerned with learning.

Our involvement with moving accreditation from a process or resource based instrument to one focused on student learning began several years ago, with major grants over several years from the Pew Charitable Trusts and the John and James Knight Foundation.

Fortunately, considerable work already existed in this field, and with the help of leading figures, such as Peter Ewell of NCHEMS and others, we were able to refine and adapt some of this for use by accreditors.

Following our initial grant, Pew then went on to make grants along the same line to some of the regional accrediting bodies. Although our grant was smaller than any of the others, an independent review commissioned by Pew found the AALE grant to be the only clear success.

Learning Assessment is now, or is becoming integral to undergraduate accreditation. While it is true that assessment is still in its infancy, I believe that its considerable benefits are becoming apparent. Perhaps the most significant of these, from AALE's point of view, is that it has proven to be one of the very few instruments that can be successfully employed to encourage faculty to reconsider just what it is that general education is supposed to do. Answering that question – which is necessary if one is going to assess whether the means chosen to achieve these objectives are working – is the critical first step in what seems to be a return to faculty responsibility for undergraduate pre-major education.

The loss of a core curriculum at many colleges over the past few decades requires this because that loss has of course been accompanied by an increase in variety. But difference resists assessment, making the assessment of such a variety of programs extremely difficult. As much as academic fields of specialization may have their own internal difficulties they do, by and large, agree to the course of study likely to produce a good chemist, engineer, or lawyer. Competent assessment of the effectiveness of such programs is widespread, which is attributable to the common coursework taken by all. Thus we ought not to be surprised that the most difficult comparative data to obtain is of undergraduate student learning, particularly in the general education portion of the curriculum. And so now we have one more argument for restoring the core: in addition to its educative value, its ends can be known and therefore assessed.

Success in accreditation monitored student assessment at the undergraduate level has, as mentioned above, produced considerable good. However, this has been accompanied by a very real cost, a cost in lost time. Assessment has added to the erosion of faculty and

administrative time, something itself that may well be responsible for maintaining poor learning outcomes. I believe this loss of time is significant and that we should be careful not to increase it further. We run the risk of reducing the amount of actual teaching taking place on our campuses and perhaps even of creating a huge but artificial edifice of assessment protocols and bodies of evidence whose purpose is mainly to allow faculty and administrators to “give the accreditors what they want” in the shortest and least painful way. The result might turn out to be little more than a cluster of Potemkin villages built of assessment tools and products, not education. Something like this has already resulted at some institutions as the result of goal driven administrations that seem satisfied, not so much with real improvement as by the creation of countless departmental mission statements, often submitted yearly; as if the mission or goals of the Biology Department were expected to change from year to year. The important point is that even Potemkin villages take time to construct, and time to maintain

There is an old saying that “Even a king should not ask for what cannot be given.” This, I think, is the heart of the problem we now face. Institutional or regional accreditation was never designed for the kind of assessment that is increasingly desired, and it cannot succeed in producing it. The assessment system currently being developed will not and can not provide the public with what it would like to have: objective rankings of different colleges and departments as an alternative to the resource-driven rankings of popular magazines. The means necessary to obtain such information, at least through regional accreditation, would risk destroying some of the most valuable characteristics of American higher education, namely, faculty and college autonomy, freedom, and judgment. To produce truly comparable data, regional bodies would have to impose the same requirements and therefore the same kind of education upon their entire regions, and then throughout the country.

In short, I believe the current legal standards on this issue are adequate as they stand. Let me remind us of what it says.

#### §602.16 Accreditation and preaccreditation standards

The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if—

The agency’s accreditation standards effectively address the quality of the institution or program in the following areas:

(i) Success with respect to student achievement in relation to the institution’s mission, including, as appropriate, consideration of course completion, State licensing examinations, and job placement rates.

As will be noticed, section

(i), which is most relevant to this issue, includes these qualifiers: “in relation to the

institution's mission" and "as appropriate."

We believe that a stronger demand, such as the one proposed by C-RAC would make things worse rather than better by further institutionalizing assessment as the goal of education rather than as simply one means to it.

All too often objections from the accreditation community are treated as merely self-serving or as ways of trying to avoid legitimate public scrutiny. I would not argue that this is never the case. But in the case of learning assessment it is precisely those of us who were on the forefront of demanding more of it who are now sounding the alarm lest it overtake in importance learning itself. Perhaps is time to recall the old Midwestern observation that "You don't fatten a hog by weighing it."

I wish to make it clear that nothing in these remarks is intended to suggest that better assessment cannot be achieved. My object has been to show that regional or institutional accreditation is not a proper vehicle for doing so. In my view institutional accreditation regarding student assessment should be left exactly where it now is, namely, ensuring that colleges and universities have procedures in place for demonstrating that they possess adequate means of assuring themselves that their educational purposes are being met. The range of acceptable procedures should be very wide, so as to accommodate the enormous variety of education offered in this country.

Are there no other ways of strengthening the link between accreditation and learning assessment? Yes, I believe there are, at least if one is willing to reconsider the present structure of accreditation.

It would be possible to revamp the present accreditation system so as to obtain the kind of answers the public seeks. Although regional accreditation is not set up for the sort of assessment that is apparently being asked for, other forms of accreditation are set up to do this. In fact, the fields of specialization represented by specialized accrediting agencies have always concerned themselves with content assessment. We do not hear any public outrage to the effect that students are graduating with biology degrees ignorant of biology, or that musicians, who have for centuries had to meet high performance standards, cannot play their instruments. Assessment works when it is focused on a specific subject or activity and when it is judged by experts in the field. The problem lies within the general education portion of the curriculum, which does not present a uniform entity to assess, and where expertise is not so easy to find.

This is why Milton Greenburg has argued ("It's Time to Require Liberal Arts Accreditation," in the AAHE Bulletin, April, 2002) that the only way to solve the assessment problem as it applies to the academic skills so many claim are not being taught or not being taught well, is to move in the direction of specialized assessment of general education and liberal education even though the latter is often defined as the opposite of specialized education.

One possibility would be to hold the specialized accreditors responsible for general

education. As it now stands, almost all of them require students to enroll in such programs, but the quality of the programs are assumed to have been assured by regional accreditation. Since we know that this is a false assumption, perhaps the subject specific accreditors should demand directly from the institutions themselves evidence of the skills and knowledge they claim their students are acquiring. Another way would be for most or all of the specialized accreditors to come to some sort of agreement as to just precisely what it is they expect from such programs and then design means of testing for them just as they now test for accomplishment in their fields through exams, performances, exhibitions, and so on. While I believe this might work, I must point out what I consider to be a very real objection to this suggestion, at least from the standpoint of AALE. Given that liberal education is already under assault from those who believe that only concrete skills and specialized knowledge is useful, I would be very cautious about any solution that would lead to more specialization, since it is hard to believe that it would not be detrimental to the wider hopes and ambitions of liberal education.

Another possibility suggested by Greenburg would be to reorient undergraduate accreditation away from the present geographically based system (an historical remnant of the past rather than a well designed tool for the current century?) to a subject or institution based system. That is, there could be a number of institutional accrediting agencies that focus on separate kinds of institutions or forms of education, regardless of where they may be located. Thus we might have an accrediting agency for research universities, one for liberal arts colleges, one for community colleges, and so on, bringing a new form of expertise to bear on specific forms of educational institutions. (AALE, of course, is just such an agency, one that deals with the liberal arts exclusively.) This would, in effect, turn undergraduate student assessment over to scholars in the fields being assessed, thus bringing the strengths of subject mastery to assessment. Even in the case of liberal education we have people who, while not being degreed explicitly in liberal education, understand the liberal arts and more importantly, understand the relation between them and the goals that lie beyond them. Regional accreditation might then be allowed to concentrate on what it does best, assuring the reliability of the processes and resources of educational institutions, and weeding diploma mills out of the system. (Of course, not all specialized accreditation performs so well, which is a good reason for encouraging competition in all fields of accreditation. If, for example, NCATE is thought by many not to contribute to strengthening teacher education, then by all means start up an alternative, such as TEAC.)

I'm sure one could come up with other ways to improve content assessment, but the point here is that demanding it from the regionals is only likely to increase the problems faced by higher education, not reduce them. They were never intended to do this and pushing them in this direction is likely to be unproductive as well as unfair.

Before closing, let me bring up a few other issues. I have mentioned above the virtues of competition. Unfortunately, however, the accreditation market has not been competitive for some time now. One of the reasons is that the transferability of student credits has been held up by organizations that at one time had no need to draw distinctions between institutional and regional accreditation. Thus, to adopt a policy that course credits can

only be transferred from one regionally based accrediting agency to another, a policy that made some sense long ago when they were written, has the effect today of placing artificial barriers between good students and good educators. C-RAC addresses this problem but does not go as far perhaps as it should. If a school's course credits are accepted because it is accredited by a regional agency, why is this superior to a school accredited by a non-regional agency with strong academic standards so long as it is also recognized by the Secretary? This is to place altogether arbitrary restrictions on a publicly funded system in a country in which geography matters less and less. AALE believes that the final decision to accept or not accept course credits from another college is the individual institution's prerogative, but to be defensible, that prerogative must not be artificially skewed to favor a system designed prior to present realities. Until such artificial barriers to transfers of credit are lifted, the illusion of a fair playing field will remain just that, an illusion.