

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

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Thank you Mr. Chairman and Members of the Health, Education, Labor, and Pensions Committee for giving me the opportunity to share some of my thoughts on how the process of institutional accreditation—our nation’s principal quality assurance mechanism for higher education—can be markedly improved.

I am Vice President of the National Center for Higher Education Management Systems (NCHEMS), a policy research and analysis organization based in Boulder, Colorado. By way of background, I have worked with regional accreditation for more than thirty years and have consulted with all seven regional commissions on topics related to standards development and the design of effective institutional review processes. I have written numerous policy papers and monographs on accreditation dating back to the 1992 Reauthorization of the Higher Education Act (HEA) and served as a member of the American Council on Education’s Task Force on Accreditation in 2011-12. I most recently completed a white paper on accreditation reform entitled *Transforming Institutional Accreditation in U.S. Higher Education* that is centered on eleven specific reforms. These reforms constitute the substance of what I want to talk with you about today, and are directed at improving the accountability and public information functions of institutional accreditation without damaging its established function of improving institutional and educational effectiveness.

The ideas that I want to share with you this morning are anchored in two central convictions. First, I believe that the practice of institutional accreditation currently falls *far short* of the model that we as a nation should possess for a credible and consistent guarantor of educational quality. The federal government, at last count, invested 138 billion dollars in postsecondary institutions and depends upon them to produce graduates who have the levels of knowledge and skills needed for the nation to remain internationally competitive with an informed and competent citizenry. Assuring the quality of our colleges and universities is therefore critical. But second, I believe strongly that *fixing* accreditation is far preferable to scrapping it in favor of an unknown, untested alternative operated by the federal government or the states. I have had a good deal of experience with national quality assurance systems for higher education in other countries—principally the United Kingdom and Australia—and I can assure you that while these systems are of high quality, they are not cheap. Only a few of our state oversight authorities, meanwhile, have the requisite capacity to discharge this function; most are understaffed and undercapitalized and would have to be beefed up considerably (again at significant public expense) to discharge this responsibility adequately. Accreditation currently performs the quality assurance role imperfectly, to be sure, but at no cost to the public. It is far better to systematically improve it than to embark upon an entirely different road.

The specific ideas that I propose are, for the most part, not new. I, together with many others, have advanced many of them since the Reauthorization of the HEA of 1992. But they have not, I believe, been put forward together in the form of a concrete, long-term, action agenda. They involve a combination of federal efforts achieved through legislation and the Department of Education, and

changes enacted voluntarily on the part of accrediting organizations themselves. These proposals are **independent** and **specific**. Action or lack of action on any one of them does not depend upon acting on any of the others. And in each case, the proposal is quite concrete, avoiding major displacements in the current regulatory landscape or significant changes in the roles and responsibilities of institutions, accreditors, and federal or state authorities. These proposals, moreover, can be undertaken without a huge infusion of additional resources. Finally, as I emphasized earlier, they can be undertaken without fundamentally disturbing the historic, and I believe largely effective, role of accreditation in inducing quality improvement.

I have divided these reform proposals into three categories of ascending difficulty or challenge with respect to their prospects for enactment. Each proposal begins with a “presenting problem” associated with current practice that has been widely cited and needs to be addressed. Each then consists of a series of specific actions intended to do so.

The first set of actions is straightforward. There is widespread agreement with them expressed through documents as diverse as the upcoming NACIQI report on the Triad, the report of the ACE Task Force on Accreditation, and Senator Lamar Alexander’s policy paper, *Higher Education Accreditation: Concepts and Proposals*. They are as follows:

- **Public Reporting.** Until recently, accreditors did not provide much information on the results of institutional reviews other than whether or not the institution under review maintained its accredited status. Such reporting has improved considerably in the past decade and most accreditors now require institutions to report this kind of information directly to the public. But public reporting might be further improved through the development of standard reports listing the strengths and challenges of each institution determined in the course of a review, as well as through the use of standard statistical performance indicators. Progress to date has been achieved as result of voluntary efforts by individual accreditors. But these efforts could be better coordinated through collective action on the part of the Council of Regional Accreditors (C-RAC) assisted through federal incentive grants for this purpose made available from the Department of Education.
- **Language.** There is considerable variation across accreditors with respect to the language that they use to describe things like the standards against which they examine institutional condition and performance, the review processes they operate, or the outcomes of reviews. As a result, it is difficult for outside observers to determine whether or not different accreditors are referencing the same things when they use different terms or are looking at different things altogether. This problem is particularly acute with respect to student learning outcomes. To address this, accreditors should be encouraged by the Department of Education through NACIQI to voluntarily adopt aligned terminology for key features of the review process and to map or otherwise justify their learning expectations for students to some kind of external reference point like the Essential Learning Outcomes proposed by the Association of American Colleges and Universities, or the Lumina Degree Qualifications Profile (DQP).

- Purpose and Focus. As currently framed, accreditation is about the quality of everything that an institution does. But this is far too broad a set of topics for accreditors to effectively examine. A first step here would be to cut significantly the number of items that accreditors are currently required by regulation to “inspect” and move this responsibility to the federal government and/or require it of states as part of their processes of licensing institutions to operate. Meanwhile, accreditors should place the primary focus of their quality review processes on the effectiveness of teaching and learning. This would mean conducting more intensive and in-depth examinations of curricula and pedagogies, and engaging in a much more thorough look at student learning outcomes. This renewed focus could be significantly aided by making changes in the language of Part H, Section 496(a) (5) (A) of the Higher Education Opportunity Act (HEOA) to emphasize “student learning” in addition to “student academic achievement.” A final ingredient here would be to extend accreditation’s reach beyond institutions entirely to embrace the growing number of alternative routes to earning credits and credentials such as credit by examination, priori learning assessment, and outsourced provision in the form of Massive Open On-line Courses (MOOCs) or StraighterLine.

Proposed actions in the second tier are more challenging, but all four have them have been widely discussed—especially in the wake of the Secretary’s Commission on the Future of Higher Education (popularly known as the “Spellings Commission”). Four proposals comprise this category:

- Standard Dashboard Measures. The body of evidence currently considered in accreditation focuses mainly on written documents prepared by institutions and reviewed by accreditors. But much information about institutional condition and performance can be succinctly presented—and, more importantly, **compared**—in numeric form. Accordingly, accreditors should develop and adopt a standard “dashboard” of ten to twelve commonly-defined statistical performance indicators for use in the accreditation process. Because alignment is important in such efforts, the development of these indicators should be undertaken collectively through an organization like C-RAC. Again, accreditors could be encouraged to develop such displays voluntarily through incentive grants provided by the Department of Education to C-RAC and suggestions by NACIQI.
- “Disciplined” Peer Review Processes. Peer Review is central to the accreditation process and should certainly remain so. But peers are good at some things and not so good at others. For example, peer reviewers frequently lack expertise in important matters like the assessment of student learning outcomes, the examination of institutional financial condition, and the interpretation of complex statistics on retention and graduation. Accordingly, peer review should be “disciplined” by expert panels operating alongside the regular accreditation process in these areas. This is largely a matter for accreditors to undertake voluntarily, perhaps encouraged by grant funding provided through the Department of Education. These actions can be undertaken by accreditors individually, because alignment across efforts is less critical than in such areas as developing a common language or standard dashboard indicators.

- Conduct of Review. Most accreditation visits rely on only one approach to gathering evidence during their site visits to institutions: group interviews of institutional staff by one or more team members. But many additional evidence-gathering approaches are available to teams, drawn from organizational consulting or the social sciences. These include mini-surveys, focus groups, audit methods, and field observation. Using such tools could result in a better body of evidence on which to make accreditation decisions. As above, because coordinated action is not necessary in this arena, such actions can be undertaken by individual accreditors, encouraged by incentive grants and NACIQI.
- Role of Students. In contrast to quality review elsewhere in the world, students currently play almost no role in U.S. accreditation. Yet they sit at the heart of the teaching and learning process at every institution. Not only could accreditation put more focus on examining student experiences as part of a site visit, students could also usefully be included on visiting teams and could help accreditors develop new standards and review processes that are focused more explicitly on the student experience. Efforts to pursue this are best undertaken by individual accreditors, but could again be stimulated through incentive grants and could be explicitly specified in the language of the HEOA.

The third and final tier of proposed actions involves more basic changes in current accreditation practices and/or the regulatory and policy environment that surrounds them. Four proposals comprise this category:

- Multiple Levels of Recognition. Currently, accreditation results in only one all-or-nothing outcome: an institution is either accredited or it is not. Establishing accreditation recognition at multiple levels would allow accreditors to recognize above-standard performance and would provide the public with more information than the current approach. Doing this would certainly require initiatives on the part of individual accrediting organizations but would probably also require language changes in the HEOA to allow institutions to be treated differently.
- A “Risk-Sensitive” Approach. In the name of “equity,” the current accreditation process treats all institutions the same. This means that institutions with good track records get the same level of attention from accreditors as problematic institutions. The alternative is to adopt a “risk sensitive” approach in which the amount of scrutiny directed at any given institution is proportional to the its track record of past performance. Such an approach could render the accreditation process far more efficient. Putting such an approach in place, however, will require explicit changes in the language of the HEOA to allow accreditors to treat institutions differently, as well as voluntary adoption of such processes by accreditors themselves.
- Revised Scopes for Regional Accreditors. The scopes of the seven regional accrediting commissions vary substantially in the number of institutions they examine. The largest has review responsibility for more than 1300 institutions and the smallest for fewer than 200. This means that they are able to devote quite different amounts of attention to any given institution

in a review. An alternative way to organize accreditation that has been proposed is by type of institution. Unfortunately, it is hard to delineate institutional types in a way that makes unambiguous distinctions among them. As a result, the best proposal is probably to retain the current scopes based on geographic region but to gradually and voluntarily redistribute the number of institutions within each region so that there is greater balance across commissions. This would require modifications in the scopes specified in the HEOA to allow voluntary changes in geographic boundaries among the regional accreditors. Additionally or alternatively, the term “regional” could be dropped in statute such that all accreditors have a national scope, with institutions allowed to choose among them.

- Accreditation Governance. The current governance arrangements of accreditation make it very difficult for those involved to speak with one voice in matters of policy. As independent membership organizations, moreover, accreditors have a hard time—and possibly even encounter a conflict of interest—when they must discipline their own members. A possible reform here would be for Congress to create a new free-standing federally chartered (but not federally owned) body to oversee and coordinate accreditors similar to the Securities and Exchange Commission, the Federal Trade Commission, or the Federal Reserve Board. This could also be accomplished through Reauthorization.

These actions do not have to occur in a particular order or be necessarily performed by the actor described. Moreover, the reforms that they describe will most realistically happen over a long time period, perhaps as long as ten years. But if only a few of these proposals are enacted, institutional accreditation for the U.S. in the year 2025 will be both more efficient and more effective in assuring quality among the nation’s colleges and universities than is currently the case.