Some of the critics of accreditation have suggested accreditors do our best work only when we sanction an institution. It’s kind of an institutional version of the “spare the rod and spoil the child” approach to parenting. Some critics even demand to know how many institutions we have shut down by withdrawing their accreditation – almost like it’s a necessary flexing of our regulatory muscle to prove we’re really ready to protect students and taxpayers. Drawing on the carrot-and-stick metaphor for changing behavior, perhaps some assume we all stick and no carrot.

If you are familiar with the history of ACCJC, you will know we are a watchdog that is not afraid to bark – or even bite. Our Commission has issued more than a few sanctions in past years. But we are conscious of the far-reaching consequences of a sanction and the action is never taken lightly. Federal policy requires sanctions be publicly reported in order to caution students and other stakeholders that an institution is out of compliance with some aspect of its operations. Unfortunately, this can feel like a form of public shaming in order to drive change at a campus.

Sanctions are not the only tool in an accreditor’s toolbox. Accreditors regularly deploy lots of carrots, including team reports, workshops, staff consultation, and Commission actions. While sanctions are not the Commission’s first resort, they typically garner the most attention, especially as they progress in severity from Warning to Probation and then to Show Cause and (under dire circumstances) to Withdrawal of Accreditation. Though an institution remains accredited while under a sanction, the action ensures that blood pressures will rise across the campus. It is, then, worth reflecting on the reasons and occasions when the Commission may reach for the stick and issue a sanction.

Most accrediting agencies will define their criteria for issuing a sanction with terms such as “serious/significant/substantial non-compliance with one or more Standards,” with room for the agency to make some judgments about the meanings of “significant” and “one or more.” The severity of the sanction is typically linked to the level of threat the area of non-compliance has to the quality of the student experience, the fiscal stability of the institution, or the integrity of its processes and outcomes.

In my experience, I have seen the interpretation of the level of a sanction influenced by the Commission’s understanding of several factors. Frequently, a Commission will discuss whether previous expressions of concern have gotten the serious attention of the decision-makers. A sanction can be influenced as well by the Commission’s discernment of the institution’s resources to address the issue. This can include not just financial resources, but also subtle factors such as leaders’ insights, decision-making structures, and constituent support. Because institutions are complex entities, and each situation is unique, the Commission does its best to target a sanction as precisely as it can to its understanding of the problem.

The Commission does not prescribe the way in which the institution will go about solving the problem identified by the sanction. The accountability for that rests with the institution, and
that is a primary goal. A sanction has the capacity to galvanize attention, unleash resources, prioritize key initiatives, and – if needed – move big agenda items upstairs to higher levels of governance. Through the years, I’ve frequently had institutional leaders confide to me, “That sanction was just what we needed to move us off the dime. We’re glad it’s behind us now, but we’re a much better institution because of it.”

The Commission keeps track over time of the primary causes for sanctions. For example, from 2011 to 2013, there was a spike in sanctions linked to planning and to board-level governance. This led to additional focused training in these areas by ACCJC and other partner organizations. During that same period, sanctions related to program review dropped significantly, suggesting growing regional sophistication on student learning outcomes and assessment.

The Commission weighs with great care the impact a sanction will have on an institution, calculating whether a period of stress will issue in a brighter, stronger future for a member institution. It should be noted the number of ACCJC institutions on sanction has declined noticeably in recent years. We don’t think this suggests a lessening of ACCJC’s expectations. Perhaps it suggests member institutions are participating as a learning community to increase their shared understanding of the value of the Standards. It may also suggest this agency’s success with increased reliance on the carrots of education, affirmation, and collaboration with its members.