2016 was
• “an inflection point,
• a pivotal moment
• a culmination of a multiyear revamping.

The federal government—
• having “consolidated its authority over accreditation,”
• had become “the major actor directing and leading this work.”

As a result—
• the conviction that accreditation’s principal priority must be “public accountability” had taken root.
These are not “temporary disruptions.”

“They will remake accreditation for the foreseeable future.”
March 13, 2017
Senators Marco Rubio (R-FL) and Michael Bennet (D-CO)

“We must end the status quo accreditation system, which
• stifles competition
• fuels soaring tuition costs, and
• limits opportunities for nontraditional students, such as working parents.
March 13, 2017
Senators Marco Rubio (R-FL) and Michael Bennet (D-CO)

“The alternative accreditation system we've proposed is
• built on higher quality standards and outcomes than the current accreditation system, and
• would mark an important first step toward shaking up a higher education system that leaves too many people with tons of student loan debt and without degrees that lead to good paying jobs.”
March 13, 2017
Senators Marco Rubio (R-FL) and Michael Bennet (D-CO)

“It’s time we shed old ways of thinking, and build a modernized education system that
- embraces different approaches and
- focuses on innovation and student success, *rather than inputs and process*.

“This bill is an important first step to change some of the broken incentive structures in higher education, *and create an outcomes-based process* for schools and students.”
March 13, 2017
Senators Marco Rubio (R-FL) and Michael Bennet (D-CO)

- A 5-year pilot program would provide an “outcomes-based process to access federal student financial aid.”

- Students could use federal student aid funds to attend institutions “that offer high-quality, innovative, and effective programs and have a proven track record of successful student outcomes.”

- Higher education programs and institutions would be able to bypass traditional accreditation and apply directly to the USDE for approval to offer federal financial aid.
Accreditation Reform and Enhanced Accountability Act

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.”
The AREAA would

- charge the USDE to develop and enforce minimum standards for accreditation (in effect designating the department as a primary accredits)
- charge accreditors to focus more closely “on student outcomes and affordability”
- mandate an immediate intervention by accreditors “when there is evidence of colleges committing fraud.”
February 1, 2017 (CHEA Meeting in DC)
Senator Elizabeth Warren (D-MA)

Establish and enforce standards for accreditation
Establish and enforce standards for accreditation
Mandate accreditor standards
February 1, 2017 (CHEA Meeting in DC)
Senator Elizabeth Warren (D-MA)

Establish and enforce standards for accreditation
Mandate accreditor standards
Mandate accreditor procedures
Your Turn

Are there elements in the (a) Rubio or (b) Warren bill you would support?
Your Turn

Are there elements in the (a) Rubio or (b) Warren bill you would support?

Are there elements that—if the (a) Rubio bill or (b) Warren bill became law—would cause you concern?
Apart from the likelihood or unlikelihood of either bill becoming law—

- What do you find worth supporting?
- What causes you concern?
A little recent history
A new century, a new direction

- 2002  ACTA: *Can College Accreditation Live Up to Its Promise?*
Accumulating pressure

- 2002 ACTA: *Can College Accreditation Live Up to Its Promise?*
- 2006 Spellings Report seeks “transformation of accreditation”
Can it? No it can’t!

- **2002**  
  ACTA: *Can College Accreditation Live Up to Its Promise?*

- **2006**  
  Spellings Report seeks “transformation of accreditation”

- **2007**  
  ACTA: *Why Accreditation Doesn’t Work and What Policymakers Can Do About It*
A wise voice in the melee

- **2002**  ACTA: *Can College Accreditation Live Up to Its Promise?*
- **2006**  Spellings Report seeks “transformation of accreditation”
- **2007**  ACTA: *Why Accreditation Doesn’t Work and What Policymakers Can Do About It*
- **2008**  CHEA: *U.S. Accreditation and the Future of Quality Assurance* (Peter Ewell)
The USDE acts!

- **2002** ACTA: *Can College Accreditation Live Up to Its Promise?*
- **2006** Spellings Report seeks “transformation of accreditation”
- **2007** ACTA: *Why Accreditation Doesn’t Work and What Policymakers Can Do About It*
- **2008** CHEA: *U.S. Accreditation and the Future of Quality Assurance* (Peter Ewell)
- **2009** USDE Inspector General recommends “limiting, suspending, or terminating” the status of the Higher Learning Commission
A fierce indictment

- 2010 Center for College Affordability and Productivity: *The Inmates Running the Asylum?*
A new mantra: “a broken system”

- **2010** Center for College Affordability and Productivity: *The Inmates Running the Asylum?*
- **2012** NACIQI report’s “alternative recommendations” describe “a broken system”
Another attempt to bring reason

- **2010** Center for College Affordability and Productivity: *The Inmates Running the Asylum?*
- **2012** NACIQI report’s “alternative recommendations” describe “a broken system”
- **2012** ACE: *Assuring Academic Quality in the 21st Century: Self-regulation in a New Age*
Proposing an alternative

- **2010** Center for College Affordability and Productivity: *The Inmates Running the Asylum?*
- **2012** NACIQI report’s “alternative recommendations” describe “a broken system”
- **2012** ACE: *Assuring Academic Quality in the 21st Century: Self-regulation in a New Age*
- **2013** President Obama suggests consideration of “an alternative to accreditation”
Your Turn

Are you aware of other indictments?
Other reform proposals?
Your Turn

If you were to author a proposal for the reform of accreditation, what recommendations would it include?
Making the case
Accreditation has responded well to a changing environment

• “A nation goes to college”
Accreditation has responded well to a changing environment

- “A nation goes to college”
- Increased costs—and accountability
Accreditation has responded well to a changing environment

- “A nation goes to college”
- Increased costs—and accountability
- Changes in higher education
  - Different kinds of institutions
  - The “new faculty majority”
  - New technologies
  - New approaches to academic credit
  - New budgeting methods
Accreditation has responded well to an *expanding mandate*

- Defining “What is a college?”
Accreditation has responded well to an expanding mandate

- Defining “What is a college?”
- Assuring transfer of credits
Accreditation has responded well to an expanding mandate

• Defining “What is a college?”
• Assuring transfer of credits
• Qualifying institutions for federal student assistance
Accreditation has responded well to an expanding mandate

• Defining “What is a college?”
• Assuring transfer of credits
• Qualifying institutions for federal student assistance
• Promoting institutional and programmatic strengthening
Accreditation has responded well to an expanding mandate

- Defining “What is a college?”
- Assuring transfer of credits
- Qualifying institutions for federal student assistance (Title IV)
- Promoting institutional and programmatic strengthening
- Requiring greater accountability
Accreditation remains

• Efficient
Accreditation remains

- Efficient
- Economical
Accreditation remains

- Efficient
- Economical
- Self-reflective
Accreditation remains

- Efficient
- Economical
- Self-reflective
- Focused on “outputs”
Accreditation remains

- Efficient
- Economical
- Self-reflective
- Focused on “outputs”
- Open to improvement
What other association, consortium, alliance, or council offers a platform for innovation that

• Reflects a broad concern for *institutional* effectiveness?
What other association, consortium, alliance, or council offers a platform for innovation that

• Reflects a broad concern for *institutional* effectiveness?
• Focuses on learning and student success?
What other association, consortium, alliance, or council offers a platform for innovation that

• Reflects a broad concern for \textit{institutional} effectiveness?
• Focuses on learning and student success?
• Convenes participants from across all sectors of higher education?
What other association, consortium, alliance, or council offers a platform for innovation that

• Reflects a broad concern for *institutional* effectiveness?
• Focuses on learning and student success?
• Convenes participants from across all sectors of higher education?
• Provides an opportunity for informal as well as formal exchange?
Your Turn

Are there other strong “talking points” that favor accreditation as we know it?
The case for continuity can be well made . . .
The case for continuity can be well made . . . but
Cartoon: “I won’t lie to you, Sandy. The sun may not come out tomorrow.”
Your Turn

Have you heard other concerns voiced?
The most persistent, determined, principled, well funded, and highly focused critic
The most persistent, determined, principled, well funded, and highly focused critic

• Seal of ACTA
ACTA’s indictment

- ACTA seal

Seal of ACTA
Accreditation is very costly.
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Accreditors are monopolies.
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Accreditation is very costly.

Accreditors are monopolies.

Accreditation is rife with conflicts of interest.

Accreditors are not private actors.

Faculty and administrators can abuse accreditation.

Accreditors interfere with trustee rights.

At its worst, accreditation is a costly nuisance.

Accreditation is no guarantor of quality.

Accreditation impedes transfer.

Accreditation stifles innovation.
What you’re likely to hear . . . .

- “It’s a ‘You scratch my back . . . .' system.”
- “Specialized accreditation is coercive: ‘Increase this program’s funding or else!’”
- “The costs of accreditation outweigh its benefits.”
- “A protective insistency on confidentiality trumps the public’s right to know.”
- “Some parts of accreditation’s mandate are in competition with other parts.”
- “Trivial differences among accreditors in process and vocabulary confuse the public unnecessarily.”
Accreditation has responded

- Emphasizing quality documented by “accountability loops”
Accreditation has responded

• Emphasizing quality documented by “accountability loops”
• Reforming processes to offer greater efficiency, flexibility
Accreditation has responded

• Emphasizing quality documented by “accountability loops”
• Reforming processes to offer greater efficiency, flexibility
• Creating additional platforms for encouraging and sharing innovation
Accreditation has responded

- Emphasizing quality documented by “accountability loops”
- Reforming processes to offer greater efficiency, flexibility
- Creating additional platforms for encouraging and sharing innovation
- Increasing visibility
Accreditation has responded

- Emphasizing quality documented by “accountability loops”
- Reforming processes to offer greater efficiency, flexibility
- Creating additional platforms for encouraging and sharing innovation
- Increasing visibility
- Expanding governance and participation
But the outlook remains unsettled
A few forecasts
Expect to remain in a “harsh spotlight”

When lawmakers do sit down to rewrite the law governing financial aid programs, accreditation will be under a particularly harsh spotlight.

*Inside Higher Ed, June 13, 2013*
Expect a “harsh spotlight”

When lawmakers do sit down to rewrite the law governing financial aid programs, accreditation will be under a particularly harsh spotlight. Members of Congress of both parties seemed to agree more with the critics, saying they were skeptical that traditional accreditation was flexible enough to respond to new developments in higher education. . . . Familiar charges against the traditional peer review system of accreditation . . . appear to be finding an increasingly receptive audience among policy makers.

Inside Higher Ed, June 13, 2013
Allowing the regional agencies to continue as they are will likely continue higher education’s slide into mediocrity and dogmatic conformity. They currently impose burdensome costs and regulations, stifle innovation, discourage competition and, most egregiously, allow substandard schools to continue operations while sucking up massive amounts of federal aid.

Jay Schalin, John William Pope Center for HE, Nov. 21, 2013
Change in the weather

A second option . . . would be to establish "a new, alternative system of accreditation that would provide pathways for higher education models and colleges to receive federal student aid based on performance and results."

White House release following State of the Union address, 2013
Is massive climate change inevitable?
Is massive climate change inevitable?

Or can accreditation take responsibility for managing the climate change?
Strategies worth considering?
Affirm consensus—
Affirm consensus—and enhance alignment.
Consensus and alignment

• Which differences among standards, protocols, actions, and vocabularies are meaningful?
Consensus and alignment

• Which differences among standards, protocols, actions, and vocabularies are meaningful?
• Which should be eliminated in favor of greater public understanding?
Consensus and alignment

• Which differences among standards, protocols, actions, and vocabularies are meaningful?
• Which should be eliminated in favor of greater public understanding?
• Which should be preserved and explained?
Improve credibility
Credibility

What practical reforms could enhance credibility

• Within the accreditor community?
Credibility

What practical reforms could enhance credibility

• Within the accreditor community?
• Between accreditors and the accredited?
Credibility

What practical reforms could enhance credibility

• Within the accreditor community?
• Between accreditors and the accredited?
• Between accreditors and the USDE?
Credibility

What practical reforms could enhance credibility

- Within the accreditor community?
- Between accreditors and the accredited?
- Between accreditors and the USDE?
- Between accreditors and opinion leaders?
Credibility

What practical reforms could enhance credibility

• Within the accreditor community?
• Between accreditors and the accredited?
• Between accreditors and the USDE?
• Between accreditors and opinion leaders?
• Between accreditation and the public?
Increase efficiency
Efficiency

What strategies not now in use might preserve (or enhance) quality oversight while reducing its intrusiveness, frequency, and cost?
Exploit agility and creativity
Agility and creativity

What more might accreditation do to respond to innovation and creativity?
Agility and creativity

What more might accreditation do to respond to innovation and creativity?

What more might accreditation do to *anticipate and encourage* innovation and creativity?
Focus on decisiveness
Focus on decisiveness and increase transparency
Decisiveness and transparency

- How can accreditation expedite its processes while avoiding any compromise of due process?
Decisiveness and transparency

• How can accreditation expedite its processes while avoiding any compromise of due process?
• How can accreditation increase the visibility of its processes and results while protecting the objectivity of peer review and honoring necessary assumptions of confidentiality?
Achieve a shared vision
A shared vision

Can accreditation assume a lead role in articulating a vision of higher education that is coherent, principled, and forward looking—a vision above all of what 21st century students need?
Your Turn

Of the possible reforms mentioned, which are most likely to prove effective?
Of the possible reforms mentioned, which are most likely to prove effective?
already under way?
Your Turn

Of the possible reforms mentioned, which are most likely to prove effective?

already under way?

What other realistic reforms should higher education accreditation consider?
Wrapping up the outlook . . .
Advantages remain advantageous

- U.S. higher education accreditation remains independent of federal control
Advantages remain advantageous

• U.S. higher education accreditation remains independent of federal control
• Peer review offers an economical, collegial, relatively efficient, and knowledgeable approach to institutional and programmatic evaluation
Advantages remain advantageous

• U.S. higher education accreditation remains independent of federal control
• Peer review offers an economical, collegial, relatively efficient, and knowledgeable approach to institutional and programmatic evaluation
• The structure of accreditation mirrors that of the academy
In practice

• Higher education accreditation has offered effective, respected, economical and efficient assurance and stimulus for more than a century
In practice

• Higher education accreditation has offered effective, respected, economical and efficient assurance and stimulus for more than a century

• Accreditation has evolved in important ways
In practice

• Higher education accreditation has offered effective, respected, economical and efficient assurance and stimulus for more than a century

• Accreditation has evolved in important ways

• Accreditation continues to evolve
In brief

For more than a century, higher education accreditation has fulfilled a critical, complex mandate—efficiently, economically, and credibly—and has demonstrated the capacity to continue doing so effectively.
Apologies to Winston Churchill

Accreditation in its present form may be the worst possible form of quality assurance—
Apologies to Winston Churchill

Accreditation in its present form may be the worst possible form of quality assurance—except of course for all the other forms that might replace it.
By taking the initiative in managing climate change, accreditation can
By taking the initiative in managing climate change, accreditation can ensure its continued relevance to its members and to the nation.
By taking the initiative in managing climate change, accreditation can ensure its continued relevance to its members and to the nation, discourage the creation of expensive, inefficient, overreaching alternatives,
By taking the initiative in managing climate change, accreditation can ensure its continued relevance to its members and to the nation discourage the creation of expensive, inefficient, overreaching alternatives, and achieve its many important missions more fully.
And ...
“The sun will come out tomorrow . . .”
Thank You