Accreditation in the Policy Crosshairs

By Barmak Nassirian

For well over a century, voluntary accreditation has served as the main mechanism for quality assurance and institutional improvement in the United States. This non-governmental peer-review model of academic self-regulation stands in stark contrast to standard international practice in the rest of the world, where colleges and universities are recognized and overseen by ministries of higher education. American skepticism about governmental control of academic matters has proven wise on multiple grounds. Not only has governmental non-interference created the largest and most accessible range of higher education options for students in the U.S., it has also produced some of the world's leading institutions of higher learning. Indeed, American-style accreditation has proven such a gold standard for quality assurance and improvement that other countries are replicating it for their purposes, often in connection with programmatic and specialized postsecondary offerings. Ironically, however, just as voluntary accreditation is being increasingly recognized as an effective tool for improving higher education in other parts of the world, it is confronting significant hostility and opposition here at home.

Accreditation's woes, not surprisingly, are tightly entangled with higher education's own receding fortunes. As the states have gradually but inexorably withdrawn support for affordable public institutions, out-of-pocket costs have escalated for the vast majority of students who access higher education through state colleges and universities or low-cost community colleges. This privatization trend, more than three decades in the making, has put public institutions on a de facto starvation diet, forced many of their students into debt, and generated political ill will toward the public sector. Furthermore, policymakers have astutely wrapped their parsimonious funding choices for public institutions in the flag of accountability, thus putting colleges in the position of explaining why they can't "get better", despite all the budget cuts and political gimmicks. This genre of accountability can best be described as an attempt to measure and increase institutional productivity and efficiency.

A significant additional pressure point on accountability has been the byproduct of the rise and fall of the for-profit sector. The precarious condition of the public sector over the decades opened new business opportunities for corporate providers, for many of which the limited capacity and budgetary constraints of public institutions have constituted an ideal environment for pitching low-quality, but expensive alternatives financed with federal aid. The past decade's proliferation and expansion of subpar and predatory for-profits have led to consumer complaints, class-action student and investor lawsuits, investigations by state and federal agencies, and a nearly constant drumbeat of headline damage. Allegations of mass fraud have proven so widespread that the U.S. Department of Education has had to embark on a rulemaking on "borrower defenses to repayment" in order to clarify the process by which defrauded borrowers, potentially numbering several millions, can have their debt discharged. The collapse of two large for-profit chains—Corinthian Colleges and ITT Technical Institutes—along with numerous additional closures of small- to medium-sized proprietary schools, has left tens of thousands of students stranded and immediately eligible for "closed-school" discharge of their federal loans. The spectacular meltdown of the for-profit sector has created an additional constituency for accountability defined as a missing consumer protection measure.

Whether it is motivated by (realistic or unrealistic) demands to do more with less, or the result of toxic programs victimizing low-income borrowers, accountability has morphed from a mere ingredient into a full-blown policy regime that dominates virtually every facet of higher education finance. Policymakers have been grappling to respond to the simple and legitimate public expectation that colleges demonstrate measurable outcomes to justify their ever-increasing costs. While convenient—albeit imperfect—metrics to measure financial outcomes for aided students—default rates, repayment rates, and the new gainful employment debt-to-income ratios—have been implemented by the federal government, they are broadly understood to be lagging indicators that only alert regulators to poor outcomes after the fact. This, in turn, has focused full attention on the accrediting bodies, who are viewed—somewhat unfairly, since the states have broad and often unexercised oversight powers of their own *qua* authorizers—as the only cops on the beat who can spot trouble before it bubbles over.

Fair or unfair, the broad perception that accreditors are, as a newspaper article put it, "watchdogs that never bark," has taken hold in Washington. There is significant merit to allegations that some accreditors have turned a blind eye to poor quality, if not outright corruption and malfeasance, at institutions accessing federal funds through their seal of approval. In fact, these allegations proved sufficiently credible for the nation's largest accrediting body and the primary overseer of for-profit providers, Accrediting Council for Independent Colleges and Schools (ACICS), to be stripped of federal recognition in the aftermath of the collapse of Corinthian Colleges. This was a radical step that was later validated by the collapse of another chain, ITT Tech, which ACICS accredited.

While evidence of waste, fraud and abuse at accredited for-profit institutions put national accrediting bodies under the microscope, misgivings about accreditation poured over into the collegiate sector, and therefore, implicated regional accreditors—as well. Naturally, policy discontent with collegiate institutions did not center on fraud, but rather, on completion and graduate rates.

Studies demonstrating the precarious financial lot of borrowers who drop out—the predictable consequence of financing equal opportunity with debt instead of with grants—and the steady barrage of foundation-sponsored exhortations to improve completions have somehow ensconced federal graduation rates—measuring only first-time, full-time students—in the public mind as reasonable measures of institutional performance. This highly imperfect metric was already overtaken by shifting demographics of higher education enrollments even 25 years ago when it was first deployed. But even if it might serve as a decent proxy for traditional-age, dependent students attending residential colleges, it systemically and radically underestimates the efficiency and productivity of institutions that serve large numbers of the "non-traditional" population that now constitute the dominant majority of enrollments, particularly at state colleges and universities and at community colleges. Nevertheless, given their visibility and administrative convenience, graduation rates have emerged as *the* bright-line marker of institutional performance.

Regional accrediting bodies have attempted to harmonize public demands for definitive answers with the complexities of assessing institutional integrity. Their balancing act was unveiled in late September in an announcement by the Council of Regional Accreditation Commissions which stated that its members would henceforth pay "special attention" to collegiate institutions with official graduation rates at or below 50 percent of their sectors (i.e, graduation rates of 25 percent or below for four-year institutions and 15 percent or below at community colleges). The regional accreditors have taken pains to assure colleges and universities that any additional reviews will be based on the totality of circumstances affecting outcomes, and that the special attention is intended to help institutions better communicate their impact on students and funders. While this additional display of vigilance may deliver on that promise insofar as colleges are concerned, it is far from clear that it will satisfy critics of higher education or allay policymakers' mistrust of accreditation. In what may prove especially significant, several leading Democratic senators (Warren, Durbin and Schatz) have introduced legislation—Accreditation Reform and Enhanced Accountability Act of 2016—that clearly indicates a rocky road ahead for accreditation.

Beyond concerns that collegiate accreditation does not adequately assure quality for its own purposes (and thus may not deserve recognition as a reliable gatekeeper of federal student aid), it also suffers the additional taint of serving an ulterior purpose of preventing innovative providers from competing with traditional colleges and universities. This critique, often articulated by labeling accreditation as a "cartel" by prominent politicians, such as Sen. Marco Rubio and House Speaker Paul Ryan, is further eroding accreditation's status as a reliable quality assurance partner with the federal government from a different angle.

It is worth remembering that as divided as Congress has tended to be in recent history, issues of bipartisan concern, even if the two sides' misgivings are radically different in nature, are the ones that translate into actual legislation through political horse-trading. Such bipartisan packages are often politically compelling, but they rarely produce particularly desirable policy. P

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