



**Statement on Accreditation
to the
National Advisory Committee on Institutional Quality and Integrity
By
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Thank you for the opportunity to submit my comments on accreditation. I hope they will be useful to the National Advisory Committee on Institutional Quality and Integrity as it reviews and deliberates this issue of national importance.

The historic role of accreditation

The American system of accreditation was created as a non-governmental, collaborative, peer system of accountability. It was designed to assure a minimum level of quality and to encourage institutional self-improvement. Its focus rightfully should be on accountability, transparency, and consumer protection.

American accreditation also resembles the nation's historic dispersion of political power, reflecting core ideals of federalism and individual autonomy. Accreditation serves as one part of a three-legged stool – accreditation, state government, and federal government. Accreditation determines that the institution meets minimum standards of quality, the state government sanctions its ability to operate, and the federal government determines whether the institution is eligible to receive federal funds.

While accreditation serves to ensure a level of quality education at an institution of higher education, it is not attempting to distinguish or define the quality. Accreditation serves to determine that the elements for delivering a quality education are in place at an institution. It does not distinguish whether the education at one institution, such as Southeast Missouri State University, is of better or lesser quality than the education offered at another university such as Northern Kentucky University or CSU Northridge.

I am very proud of the role that AASCU and its sister organization APLU have played in facilitating accountability, transparency, and consumer protection among our own institutions with the development of the Voluntary System of Accountability, which now involves 326 public institutions. Accreditors can and should rely on institutionally-determined and

implemented outcomes measures to evaluate quality assurance and improvement at the institution.

I believe that the system of accreditation that we have created over the years has in the main done an excellent job of assuring quality while preserving diversity and creativity. However, this series of hearings reflects the need for all of us to consider accreditation in the rapidly changing context of the 21st century.

AASCU believes:

1. The voluntary system of accreditation is substantially better than a process designed and carried out by a governmental agency.

Our belief in the need to preserve a non-governmental system doesn't grow out of a defensive, self-protective reaction but instead emerges from a careful study of accountability systems around the world. Most countries employ a government-organized system of accreditation. Most of those systems promote uniformity and adherence to a single set of standards, while repressing innovation and new models.

2. Having said that, however, the American system needs to develop some new approaches to address areas of current concern.

The historic process of accreditation has focused largely on inputs. I believe that we must focus substantially greater attention on outcomes. In particular, I believe that we must pay greater attention to learning outcomes for our students. Those outcomes must be broad, not narrow. How well are institutions preparing students for work in a global economy? How well are institutions preparing students for living in a diverse, multicultural world? How well are institutions preparing students to become informed and engaged citizens in our great democracy? How well are institutions preparing graduates to think critically and analyze thoughtfully? The accrediting community, to its credit, began to address learning outcomes, beginning in the mid-1980s. But that focus on learning outcomes, for far too long, was toothless. The focus on learning outcomes must be accelerated and substantially improved.

A second concern is cost. The cost in both financial and human resources is enormous. Are there ways that cost could be reduced without jeopardy to the accreditation process?

A third concern involves the practice of purchasing an institution and simultaneously accreditation, even though the faculty, curriculum, and mission of the institution is substantially changed or eliminated.

A fourth concern involves developing better mechanisms to account for rapid changes in delivery systems, program design, and instructional practices. Technology continues to alter the ways that institutions carry out their basic educational purposes. We need to ensure that accreditation processes are as nimble as the rapidly-changing educational landscape it monitors. Some regional accreditors, to their credit, have created processes (Academic Quality

Improvement Project [AQIP] and Quality Enhancement Plan [QEP]) to allow institutions to focus on new approaches but more such development is needed.

A fifth concern is that the current process allows groups of institutions to gather together for self-accreditation. There is always a tension in the self-regulatory process between high community standards and self-interest. Usually, self-interest is addressed by having the community diverse enough that any single institution's self-interest is subsumed by the community's collective interest. But if a select group of institutions, all similar in their self-interest, are allowed to become their own accreditors, the self-interest of individual institutions becomes paramount. That should not be allowed to happen.

3. The accreditation process should not be confused with the Department of Education's responsibility to determine institutional Title IV eligibility.

The federal government now invests more than \$150 billion in financial aid programs. It is appropriate that the federal government wants to have some accountability for that vast annual expenditure. And it is also appropriate that accreditation be used as one measure of eligibility for receiving federal funds. At times, the federal government has placed requirements on accreditors to ensure that taxpayer's interests are best served. Some of these requirements make sense and they are usually reviewed through a traditional accreditation process.

However, many of these requirements are legislative mandates on the Department that have been inappropriately transferred to the responsibility of the accreditors. The Department needs to move away from its reliance on accreditors as enforcers. Perhaps a model can be put in place in which accreditors merely inform the Department of their decisions, whereafter the Department engages the institution before making a decision regarding Title IV aid. The Department of Education's reliance on accreditors for enforcement has led to a diffusion of the appropriate role for institutional accreditors and has fostered an environment where the Department does not do an adequate job of enforcing its own rules.

The diversity of accreditors has diffused, rather than focused, appropriate federal concern about accreditation. There are regional, national, program and career-specific accreditors. NACIQI should focus its attention on recognition of institutional accreditors as part of the Title IV eligibility considerations and should question whether regional and national institutional accreditors should be treated differently. AASCU recommends exploration of the concept of a "tiered or developmental" approach to accreditor recognition as well as disseminating the best practices of those agencies known to be historically stable and clearly in compliance with all government recognition criteria. We think NACIQI should choose to leave program and career-specific accreditation issues to the states.

Accreditors need to shift the focus of their accreditation reviews from process and input specific criteria to a greater concern about student and learning outcomes. They need to consider institutional reports of learning outcomes such as those to be reported as part of the Voluntary System of Accountability. Institutional accreditors, not the federal government nor the individual institutions, should establish minimum standards for student and learning outcomes and should recognize institutional achievements beyond meeting those minimum standards.

If the focus does shift from over-reliance on input standards, then Department of Education regulations also need to shift, because they too are overly process and input specific. The Department will need to relax its expectations of accreditor enforcement of its requirements and rely on its own resources for enforcement. It is appropriate for accreditors to assist the Department with the protection of the taxpayer in the vein of serving the public interest, but only on those levels that are appropriate to the quality of education and an institution's ability to offer that education.

One of the initial purposes of accreditation was to help ensure confidence in the quality of an institution's offerings; the accreditor's role for providing consumer information should be expanded to meet new and changing demands from consumers for reliable and relevant information about the quality and outcomes of the academic offerings of institutions. The quickly evolving state databases that share common elements for accountability should be considered as a source of such information that might readily be incorporated into an institution's pre-accreditation visit self-study. We also believe this means an increasing reliance upon and distribution of consumer useful data following an accreditation review.

Finally, AASCU challenges NACIQI to set a goal of having the public, states, congress, parents and students better understand the accreditation process and its necessity. The goal should be aimed at helping them know what it is and what it does for students, institutions and the public.