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March 24, 2008

The Future of Accreditation?

By [Judith S. Eaton](#)

With Congress poised to renew the Higher Education Act, the push for accountability has opened the door to proposed federal changes to accreditation of higher education. If not properly countered, federal accountability demands will set us firmly on a path where self-regulation of academic quality through accreditation is significantly diminished by government regulation. We will experience a shrinking of the presence of accreditation. If confronted with our situation, Alice in Wonderland might have said: "Self-regulation is, after all, just government regulation that I like."

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It was the year 2014 and the shrinking of accreditation was complete. Self-regulation through voluntary accreditation had almost disappeared from the higher education landscape. It had been replaced with federal control of thousands of U.S. colleges and universities.

Just as the 2008 amendments to the Higher Education Act (HEA) enlarged the footprint for federal control over higher education, the 2014 amendments enabled the government to erase accreditation as an arbiter of quality from federal statute. Congress removed the standards for recognition of accreditation from the law and shut down the federal advisory committee that reviewed the accreditors, halting the 60-year federal reliance on the enterprise as a gatekeeper of federal funds. The voluminous regulations that accompanied the law and certified the reliability of accrediting organizations were rescinded as well.

How It Happened

How did this take place? Voluntary accreditation was undermined by a public that now vested greater authority in government judgment about performance of colleges and universities rather than accreditation, a nongovernmental, rather obscure and “private” source of judgment of quality that had come to be viewed as inadequate. The press and elected officials, increasingly reflecting public sentiment, were routinely describing accreditation as insular and, at times, even arrogant in its lack of full transparency and responsiveness to the public.

Accreditation, which had claimed the mantle of primary authority on higher education quality for many years was, above all, diminished by the public accountability movement that had roots in the 1980s. This demand for accountability reached a crescendo toward the end of the George W. Bush presidency (2000-2008), with the federal Secretary of Education’s [Commission on the Future of Higher Education](#) in 2005-2006 and subsequent activities in 2007. The twin themes of the commission’s report and attendant activities — the inadequacy of accreditation and the consequent need for additional government control of quality — coincided with the culmination of efforts to reauthorize the HEA that had been under way since 2003 and was completed in 2008. The reauthorization now incorporated much of the thinking of the commission, setting the stage for the diminution of accreditation and the assertion of federal control of higher education.

The federal government, by establishing an alternative system of quality judgment that had immediate credibility with the public, eclipsed the need for accreditation. The key element was the replacement of accreditation standards with government standards for quality, comparable in a number of ways to the 2002 No Child Left Behind Act that established government expectations for success in elementary and middle schools. Accreditation could no longer compete.

Institutions, to their credit, did try to sustain their considerable loyalty to accreditation.

But, in the end, they could not continue to invest in the process. College and university presidents had conducted a cost-benefit analysis that made it painfully clear that future perceptions of their institutions rested more and more with judgments emerging from government scrutiny, not accreditation. The accreditation process that institutions had undergone for years — self-studies, site visits, peer review and collegial system of careful judgments about quality – no longer provided a significant return on investment.

Higher Education and Accreditation React

Looking back, it was clear that colleges, universities and accreditors underestimated the persistence and intensity of calls for greater public accountability. Despite a series of valuable and important initiatives in this area, higher education’s otherwise compelling and forceful responses did not match the urgency of the accountability demands.

And, in a number of instances, higher education institutions and accreditors had remained emphatically resistant about public accountability. They often disagreed with government about the appropriate tools needed to address this vital subject. From the perspective of many educators, current approaches to accountability often rested on either erroneous assumptions or inadequate evidence or poor methodologies. This was simply unacceptable when addressing such complex and nuanced issues as institutional performance and student achievement.

Accountability that was mandated also did not sit well with higher education and accreditation leaders who firmly believed that it had to be addressed voluntarily. The result was a good deal of higher education discussion and activity to address accountability dating to the 1980s, but

not enough robust action to fully engage public demands.

Compounding the problem, some institutional and accreditation leaders were no longer fighting for the privilege of self-regulation. Perhaps self-regulation was simply taken for granted. Perhaps it had been a fundamental feature of higher education for so long that it had become invisible. Whatever the reasons, leaders tended, less and less, to make the case for self-regulation as the responsible exercise of a coveted independence and self-determination for the academy, especially in academic matters.

In retrospect, it would have been helpful if more academic leaders had publicly re-affirmed the importance of self-regulation. It would have been valuable to emphasize that the resultant academic independence was at its best when serving the public interest. In the face of the accountability challenge, failing to provide powerful advocacy for self-regulation that went beyond “self” resulted in higher education surrendering one of its most precious assets: the public trust vested in its institutions for leadership in academic quality.

Moreover, the long-held distinction between self-regulation and government regulation was beginning to blur. As early as the beginning of reauthorization of HEA in 2003, some institutions and accreditors appeared more and more comfortable defining “self-regulation” as “government regulation that we like.” They were ignoring the vital importance of locating responsibility for academic quality and direction with the leadership of colleges and universities. Institutions and accreditors demonstrated, over and over again, that they were willing to allow government to step in, trumping institutional leadership when it came to prescribing academic quality. This was clear during the 2007 negotiated rule making on accreditation where some of the members of the panel from higher education and accreditation supported government efforts to add regulatory language that strengthened the federal role in setting expectations of student achievement, a responsibility that historically rests with institutions.

The impact, however unintentional, was a transition from government holding higher education and accreditation responsible for producing quality institutions and programs to government prescribing what counts as quality and thus regulating higher education. It was one thing, for example, when the government requires that institutions report graduation rates of students and quite another if the government actually stipulates acceptable graduation rates for all colleges and universities.

In short, the demand for greater accountability pressed higher education and accreditation to assure the public that self-regulation was rigorous, transparent and accountable. However, in the years following the 2008 reauthorization, it was clear that the public was not assured.

How Did Accreditation Shrink?

The Federal Government Took Action

To replace accreditation standards, the federal government went on to develop four tools to judge academic quality: (1) a data collection tool to expand information on institutional characteristics and results, (2) a tool of government benchmarks of academic quality, (3) a U.S. Qualifications Framework and (4) a national ranking system for all colleges and universities.

Using the authority that the government gained in the 2008 reauthorization, the Department of Education created its data collection tool by requiring that institutions submit significantly enriched data on institutional performance – not only graduation, but also, e.g., transfer, job placement and entry to graduate schools. By 2009-2010, the government was using these expanded data to develop cut-off points or “bright line” indicators to make judgments about institutional quality. There were now government-required levels for many areas of institutional performance. These data were also to be used to populate the government qualifications framework and rankings.

By 2011, a U.S. Qualifications Framework was complete. It created a lockstep approach to student achievement with expectations of specific competencies aligned with each degree level (associate, baccalaureate, masters, doctorate) offered by an institution. The federal qualifications framework took its place beside those already established by a number of other countries and regions, e.g., China, India, the European Union and some Canadian provinces. The framework, more than any of the other tools, essentially standardized national expectations about higher education quality. Finally, by 2012, the federal government, modeled on *US News and World Report*, had also completed a ranking system for all institutions.

The federal government also assured that the public could easily access the framework and rankings, as well as customize the data for its own use. Building on the models of the “College Navigator” mounted by the Department in 2007 and the “Mapping America’s Education Progress” for elementary and secondary education in 2008, the Department Website, as of 2012, included a search engine for all higher education institutions that anyone could use to find and rank institutions by academic quality indicators as well as by, e.g., type of institution, size, budget, and financial aid to students. Prospective students, the press and the public could readily access these sites and make their own independent judgments of what counted as a quality school.

By 2014, these tools resulted in government judgment about quality as the primary driver of federal funds, now totaling some \$150 billion annually, to thousands of colleges and universities through student grants and loans as well as research and program funds. From now on, these federal dollars were conditioned on the respective performance levels of institutions as determined by the government, including adherence to the U.S. Qualifications Framework and positioning in the federal rankings scheme. Only institutions with government-defined “acceptable,” e.g., graduation rates and transfer rates were eligible. These institutions also had to document government-acceptable rates of entry to graduate school and job placement.

State Government Moves as Well

State government, responding to the tools developed following the 2008 reauthorization and reacting to 2014, also replaced accreditation, using either the federally generated quality judgments or rankings or establishing state indicators, qualifications frameworks and rankings. States discarded accreditation when deciding whether an institution could operate in their respective domains. For many states, the movement to indicators, frameworks and rankings was quite straightforward, building on their many years of state performance budgeting and performance reporting for public universities that went back to the 1980s. The scope of state authority was greatly enlarged, however, with thousands of nonprofit and for-profit private institutions also included in these requirements as a condition of being licensed to operate.

State licensure of individuals in the professions also ceased to rest on whether or not the programs from which students graduated were accredited. Rather, states now required that programs such as law, medicine and other licensed professions no longer be based upon accredited status, but on program performance as measured by federal or state indicators, including whether graduates met the expectations of competencies captured by qualifications frameworks, or the positioning of programs in national or state rankings. States also conditioned their mutual reciprocity with regard to licensure, agreeing to acknowledge each others’ licensure of professionals only if the states from which the professionals came used either the federal or state quality standards.

Employers and Foundations Change Course

Following the lead of the public sector, many private employers and foundations abandoned the requirement that institutions sustain accredited status for a demand that institutions meet specific federal or state benchmarks for performance as a condition of providing, e.g., tuition assistance or awarding grants. This shift affected millions of employees in computer and electronic fields, the automotive industry and many service industries. The private foundations that had long favored higher education with research and program funding based on accredited status now replaced this demand with requirements for evidence of how well institutions fared with regard to federal or state indicators and rankings as a condition of receiving foundation funds.

Accrediting Organizations as Enablers of Government Control

Some of the 81 recognized accrediting organizations that were active in 2008 closed their doors within several years of the establishment of federal quality standards and, ultimately, the federal government’s abandoning of the gatekeeping role. Others continued to operate, but fundamentally retooled.

Accrediting bodies transformed themselves from arbiters of higher education quality to providing audit and consulting services to colleges and universities. They became enablers of government control of quality. Institutional accreditors assisted colleges and universities in the data collection required by the federal government. They provided advice to institutions about how to analyze and use these data to showcase college and university efforts. They provided consulting assistance to establish profiles of excellence based on government indicators.

In a similar vein, programmatic accreditors, instead of supplying the standards that drove, e.g., law, medicine, business and many other professions, now worked with programs to meet state or federal standards that were aligned with state licensure requirements. They provided technical assistance to programs needing data collection and analysis and, as with institutional accreditors, worked with programs to establish profiles of excellence that would be affirmed by government review.

Shrinking Accreditation Did Not Improve Higher Education Quality

While government was successful in establishing this new system of quality judgments, this did not, contrary to public expectations, translate into additional success for higher education. Standardization of quality expectations and emphasis on transparency under government control did not, as many had anticipated, launch a new era of blossoming higher education quality. To the contrary, the new government-directed quality standards, with increasing bureaucratic emphasis on a single set of performance levels, coincided with an era of declining success in higher education. The government-based accountability brought U.S. practice closer to the ministerial approaches of many other countries. At the same time, however, U.S. institutions did not fare as well as in the past when compared to international colleagues.

As voluntary accreditation withered and government control flourished, U.S. higher education increasingly lagged beyond many other nations in academic standing, participation, success with degree attainment, innovation in teaching and success in research. Gone were the days of international leadership and successful competitiveness of a U.S. higher education enterprise that once was routinely described as “the best in the world.” Gone was the conspicuous and often overwhelming presence of U.S. institutions in the major international rankings of higher education such as the Shanghai rankings and the *Times Higher*.

Did the shrinking of accreditation serve the public interest? No. It was clear, by 2014, that public accountability, however valuable and desirable as an end in itself, was not a driver of academic quality. It was clear that replacing self-regulation through accreditation with government regulation did not enhance academic quality.

Above all, it was clear that, absent additional energetic action about accountability on the part of higher education and accreditation, the shrinking of accreditation could actually occur.

Judith S. Eaton is president of the Council for Higher Education Accreditation.

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Comments

Frameworks, yes! Feds? No way!

Leaving aside the shallow and juvenile analysis and prescriptions of the Spellings commission and the obsequious kow-towing of major higher education organizations to its “let’s grab any test that crosses the radar screen” approach to accountability, qualification frameworks would bring a lot more transparency to the system than we currently have, and certainly would tell students what their degrees mean, something that’s rather elusive now. The 46 countries involved in the Bologna process (it’s more than the European Union, Ms. Eaton) are demonstrating as much, in different ways, though it is a slow process. As IHEP’s forthcoming “The Bologna Club: What U.S. Higher Education Can Learn from a Decade of European Reconstruction” argues, this is a state matter—and a matter for the disciplines, based on the “Tuning” methodology that has now been imitated in Latin America as well. In this, the individual European higher education systems are behaving as our states would: singing in the same key, but not with the same melodic line. It’s hard work to develop those frameworks—5 years for any one of them. But it sure opens the doors of perception. Do not, however, let the Feds anywhere near it. Among other reasons: the Department of Education does not have the intellectual, creative, or organizational capacity to pull it off. Thank goodness!

Cliff Adelman, Senior Associate at Institute for Higher Education Policy, at 8:30 am EDT on March 24, 2008

Chilling scenario

Thank you, Dr. Eaton, for describing a chilling, but quite possible, scenario for the future of higher education. It should motivate us all to pay attention now.

An additional thought: because the government-imposed measures of quality will be designed to capture achievement indicators common to all institutions, and to measure learning quickly and cheaply, they will necessarily focus exclusively on the lowest-level cognitive skills. Measures of higher-order skills such as critical thinking, reasoning, analysis, and writing will be reduced to 50-minute timed tests where only the most superficial thinking is possible. The high stakes attached to test results will drive curriculum downward to the lowest common

denominator, just as it has in K12 education.

It is folly to think we can somehow measure thinking without thinking. Better assessment models are available and can be appropriated to satisfy any real need for accountability without resorting to standardized testing.

Lee Griffin, Doctoral candidate at Michigan State University, at 9:15 am EDT on March 24, 2008

accreditation not voluntary

Whether Eaton likes it or not, “voluntary accreditation” is a thing of the past – there is nothing “voluntary” about it for institutions unless they are willing to forego their access to Title IV federally guaranteed student loans and student aid grants. And only one college has done that, as far as I know. Why she continues to labor under the illusion that this is voluntary, I cannot understand.

I find the rest of her piece equally flawed as well.

Eaton’s failure to propose meaningful measures of accountability undercuts her alarmist rhetoric. It is this kind of lack of imagination that will force her to give up self-regulation by the accrediting guilds, which, as she contradictorily suggests is “just [the kind of] government regulation that I like,” but is also just wishful Alice-in-Wonderland thinking.

As most recent NACIQI testimony demonstrated, the committee is powerless to “certify the reliability of accrediting” guilds. <http://www.insidehighered.com/news/2007/12/19/naciqi> There, NCA was forced to concede publicly and for the record that there were “no minimum [accrediting] standards.”

The apt comparison to Eaton’s rhetorical exercise is with the Yale Report of 1829, the report in which faculty staunchly supported the mandatory teaching of Latin and Greek in the classical curriculum.

Innovations such as the elective curriculum, as proposed later by Charles Eliot, Harvard’s president, were effectively stifled by the report. The faculty hid behind the Yale Report for only so long, before the academic landscape changed.

That landscape is changing again beneath Eaton’s feet, but she doesn’t know it. Or she is resisting it, just like the Yale faculty did in 1829.

[Glen S. McGhee](#), Dir., at Florida Higher Education Accountability Project, at 12:25 pm EDT on March 24, 2008

“Did the shrinking of accreditation serve the public interest? No. It was clear, by 2014, that public accountability, however valuable and desirable as an end in itself, was not a driver of academic quality. It was clear that replacing self-regulation through accreditation with government regulation did not enhance academic quality.”

Bravo! As a libertarian at heart, I applaud anyone who will take a stand against more governmental intrusion in the lives of Americans.

I wonder, however, if there is a double standard. Would everyone who applauds this article be so supportive of an article lambasting government-run universal health care? If the US government would muck up something as intrinsically important as higher education (as assuredly it would) it would also muck up something as important as health care.

Assistant Professor, at 10:05 pm EDT on March 24, 2008

As a professor in a religious institution, I have watched with alarm CHEA’s willingness to allow TRACS to join the ranks of accrediting agencies. TRACS accredits (and thus opens the door to significant federal funding for both students and schools, as well as lending credibility to the incredible) “colleges” that consist of a few night classes in a church, “colleges” that have no or very few resident faculty, and a place like Bob Jones University (well known for its loss of tax exempt status for its refusal to allow inter-racial dating). Until CHEA is willing to make some difficult decisions, they invite government intervention and eventual replacement by a government agency.

Professor, at 4:50 pm EDT on March 25, 2008

Feds vs. Accreditors vs. ??

Judith Eaton’s essay is one of the best I have ever seen on this set of issues. I don’t agree with all of it, but it certainly gives anyone interested

in postsecondary oversight (which is my job) pause to think.

Likewise, Cliff Adelman is always worth reading, and his comments here are helpful, although there are some issues with the Bologna process that I will discuss in an article later this spring.

It is important to remember that the federal linkage that allows feds to yank on higher education is based largely on the need of colleges for student financial aid. The federal government really needs to establish its own meaningful standards for such aid eligibility and stop asking accreditors to play an enforcement role for which they were not designed.

The notion of a “federally recognized accreditor” is very helpful to anyone who wants to separate the sheep from the rats, but why is it desirable to be a sheep? Why should there be any relationship at all between accrediting bodies and the federal government?

Alan Contreras, Eugene, Oregon, at 8:50 pm EDT on March 28, 2008

A quote from the Professor:

(Quote)As a professor in a religious institution, I have watched with alarm CHEA’s willingness to allow TRACS to join the ranks of accrediting agencies. TRACS accredits (and thus opens the door to significant federal funding for both students and schools, as well as lending credibility to the incredible) “colleges” that consist of a few night classes in a church, “colleges” that have no or very few resident faculty, and a place like Bob Jones University (well known for its loss of tax exempt status for its refusal to allow inter-racial dating). Until CHEA is willing to make some difficult decisions, they invite government intervention and eventual replacement by a government agency. (End Quote)

TRACS exists largely for reasons of theology, the born-again, charismatic, thunder and brimstone kind. I think they may tend to write the Professors school of as atheistic and devil worshipping. The two are simply a bad fit in one accreditation organization, ergo TRACS.

Back to the maxim “It’s always about the money.” The regional accreditors love to accredit schools that look like them, private schools with big endowments or state schools with access to the public teat.

From following such matters for the last 10 years, most loss of accreditation has nothing to do with quality of academic programs. The major accreditors squeal whenever standards relating to measuring academic outputs are proposed. Most loss of accreditation has to do with administration or finances which generally makes the big private and state universities immune. Granted there usually is one meaningless academic deficiency tagged on for good measure.

Dennis Ruhl, at 6:15 pm EDT on March 30, 2008

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