QUESTIONS THAT SHOULD BE FREQUENTLY ASKED

There are several brief, cogent surveys of higher education accreditation, the most useful of which may be An Overview of U.S. Accreditation by Judith Eaton, President of CHEA (Eaton, 2012). She should know. Hence these questions can focus largely on our emphasis—how accreditation has changed, is changing, and must continue to change. The final questions concern important episodes in the history of accreditation that express the same emphasis, change and the need for change.

What is the root principle of higher education accreditation?

“Credit where credit is due.” The hoary cliché is venerable for a reason. Whether on the playing field, in the workforce, or in the classroom, we want to receive appropriate credit for what we accomplish and trust it will have some value beyond the present. If later we find what we have achieved no longer counts, we are likely to feel a sense of injustice. But the cliché has a broader application. Just as those who earn credit want others to value it, those who evaluate credit want to do so confidently. Both of these principles are evident in the origins of higher education accreditation, and both remain part of its core mission today.
What shared assumptions guide higher education accreditation in the US?
Accreditation has always reflected the values and priorities of those it accredits. That is one of its strengths, according to one perspective, and a considerable weakness, according to another. College administrators and faculty members comprise the majority of accrediting organization boards, review committees, and evaluation teams. Accreditors therefore can usually be counted on to respect institutional autonomy: the right (within some constraints) of an institution or program to define its mission, to organize itself in pursuit of that mission, and to enjoy in that pursuit a healthy measure of self-determination, from the boardroom to the classroom. At least since the early 1930s, most evaluations of an institution or program have begun with a consideration of what the institution or program seeks to accomplish. Though some critics charge that accreditation should enforce more rigorous and consistent standards, respect for mission enables accreditation to remain sensitive to the diversity of US higher education,

What does higher education accreditation in the US do?
According to the USDE, the overarching goal of accreditation “is to ensure that education provided by institutions of higher education meets acceptable levels of quality” (USDE Overview, 2012). Over time, the missions of higher education have proliferated beyond this beginning—a good thing, in some ways, problematical in others. The Eaton Overview describes three other roles (Eaton, 2012, pp. 2-3). One, that of enabling students to transfer academic credentials from one institution to another, may be found in objectives of the earliest accrediting associations. The other two—providing “access to federal and state funds” and “engendering private sector confidence”—are more recent. For many accreditors, this mandate has expanded to
include responsibility not only for quality assurance, but also for quality improvement, the strengthening of programs and institutions. More recently, as indicated in the Preface, the President of the US has himself demanded that accreditation do more to promote and report on the “affordability” of higher education relative to the “student outcomes” institutions and programs are achieving.

Why do accreditors regulate “access to federal and state funds”?

Title IV, one part of the Higher Education Act of 1965, authorizes the distribution of federal financial aid in higher education. Having defined the purpose of Title IV as the extension of “the benefits of postsecondary education to eligible students,” the law identifies five approaches: Federal Pell Grants, “supplemental educational opportunity grants to those students who demonstrate financial need,” payments to states “to assist them in making financial aid available,” “providing assistance to institutions of higher education,” and, perhaps most notably, the “trio” of “special programs and projects designed (A) to identify and encourage qualified youths with financial or cultural need with a potential for postsecondary education, (B) to prepare students from low-income families for postsecondary education, and (C) to provide remedial (including remedial language study) and other services to students” (Sec. 400 [20 U.S.C. 1070]). There are now eight such programs, rather than three, but “TRIO” survives as the collective designation. To avoid the necessity of creating a new bureaucracy or further burdening an existing one, the law provided that accrediting organizations recognized by the USDE would determine eligibility for such funds. Hence, if their students are to be eligible for federal student aid under Title IV, programs and institutions must be accredited by recognized agency. Such
funds are not limited to traditional institutions and programs. Career colleges accredited by a regional or recognized national accreditor may benefit from student access to federal programs.

**Why are critics challenging accreditation’s sole responsibility for such “gatekeeping”?**

As responses to the 2013 State of the Union address indicated, there are many voices calling either for the reassignment of this responsibility to some other bureau or for an alternate process through which innovative institutions and programs might bypass current accrediting protocols in order to seek access to Title IV funding. Chapter 4 describes several of the most prominent demands in this regard.

**Does accreditation conduct reviews outside the US?**

Yes—in two senses. US higher education accreditation reviews both non-US programs and institutions and US programs and institutions operating outside the US.

In the first category, according to the CHEA *Almanac* (2012), 42 accrediting organizations “were active in in 70 countries outside the United States . . . accrediting 857 non-US operations.” Five of the six senior regional accreditors, excepting only the North Central Association Higher Learning Commission, reach out to institutions or programs in Europe, the Middle East, and Latin America. National faith-based and career-related accreditors consider programs in South America, Australia, and China. Of the specialized accreditors, ABET is by far the most active internationally with regard to non-US programs. The technology and engineering accreditor reviews 246 programs in 22 countries including India, Egypt, and Kazahhstan. The Association to Advance Collegiate Schools of Business also has a substantial presence among non-US programs and discipline-specific institutions, accrediting 165 programs or institutions.
from Chile to Qatar. Extending their services to 746 programs or program-specific institutions in 67 countries, the specialized accreditors account for most of the international accrediting activity.

Regional accreditors are most active with regard to the accreditation of the international activities of US institutions. Middle States, which reviews the operations of 243 institutions in more than 80 countries, is the most fully engaged internationally, but all regional accreditors other than Northwest are responsible for a considerable range of programs in many nations. (The CHEA Almanac provides a full listing; these figures are cited from the 2011-12 online edition.) When all accreditors are considered, US higher education accreditation reaches out to 720 programs or institutions in 122 countries.

**How does accreditation perform its complex mission?**

All forms of accreditation rely on similar protocols. An initiative from the institution or program seeking accreditation leads to confirmation by the accreditor that the application is appropriate. Then the process leads to self-analysis by the institution or program; to the review of that self-analysis (and often of the institution or program itself) by trained peer evaluators either off-site, on-site, or both; to consideration of the peer review recommendations first by an accreditation committee, then by a board of directors; and, as necessary, to an opportunity for a program or institution to appeal an unfavorable decision. Once an institution or program is accredited it remains subject to sustained oversight and to further extensive review according to a regular cycle. Significant changes in an institution or program may trigger reevaluation and reconsideration prior to the next scheduled review, however.

**What happens during the on-site peer review?**
Although there is no fixed common protocol, most on-site peer review processes include five elements. First, prior to traveling to the campus of the institution or program being evaluated, peer reviewers scrutinize the self-study and other materials in the light of the accrediting organization’s standards. The team members may discuss these materials in conference calls, identify areas deserving of scrutiny during the campus visit, and, in some cases, develop preliminary drafts of evaluative statements. Second, once convened on (or adjacent to) the review site, members of the team organize themselves according to specific assignments, schedule interviews with groups and individuals, and plan periodic team discussions. On-site visits generally last two to four days. Third, once they begin their work on site, the reviewers audit the self-study through the examination of documents, through the appraisal of campus operations and resources, and through formal and informal discussions. Fourth, the team convenes to compare its findings, to reach consensus on its recommendations, and to outline or draft the report that will be submitted to its parent organization. Finally, the team or a delegation from the team meets with program or institutional representatives to provide a preview of its findings and recommendations. This session takes place ordinarily just before the departure of the review team, lasts less than an hour, and almost always offers simply a briefing—not an opportunity for discussion or debate.

**To what extent do such protocols ensure quality education?**

To a considerable extent, by one perspective. Hardly at all, by another. As we shall find, there are strong persuasions on both sides.

**Who pays for accreditation?**
For the most part, the accredited. Institutions and programs typically pay annual dues to their accrediting association. Those applying for initial accreditation usually pay an application fee and may pay additional fees for each stage of the process. And in most cases institutions or programs hosting an on-site review for purposes of initial accreditation or reaccreditation pay the costs of that review. Of course, all these are so-called “external” costs. There are also internal costs associated with faculty and administrative time invested in assessment and self-study, with volunteer service in accreditation activities, with the preparation of annual or periodic filings, and with attendance at accreditor meetings. Some accrediting organizations also receive grants from foundations in order to undertake special projects.

**How does accreditation in the US differ from similar processes in the rest of the world?**

In the US, oversight and regulation are based in higher education itself, not the government. Instead of a federal bureaucracy supported by tax revenues, independent non-profit associations funded by membership dues and service fees assign members from a corps of trained volunteers to serve as peer reviewers.

**Does reliance on volunteers make the process less reliable and trustworthy?**

The title of one critical report, *Inmates Running the Asylum*, points to one perspective on this question. However, a more broadly held view of peer review might be suggested by the aphorism of a university president who pioneered the “value added” approach to demonstrating institutional effectiveness. He described his creative but unorthodox methods as “working in practice, if not in theory” (McClain, 1985). Because of peer review, an accrediting commission can rely on a small staff to manage the process, maintain liaison with member institutions or
programs, conduct or contract for volunteer training, and support its board in the deliberations that lead to decisions. Together, accrediting organizations employ fewer than 1000 full-time and part-time staff members. The real work of evaluation thus belongs largely to the more than 54,000 college administrators and faculty members who make themselves available as volunteers for service and pursue the training required to provide it (CHEA Almanac, 2012).

**Peer review might appear to be subjective: “you scratch my back, I’ll scratch yours.”**

In practice, rarely. Accrediting commissions enforce clear standards to prevent conflicts of interest, train volunteers to embrace a culture of evidence-based objective judgment, monitor teams and processes to ensure that evaluation remains systematic and rigorous, and appoint “public members” (individuals not involved in higher education) to their boards. Public members sometimes serve on review teams also.

There are strategies through which even greater objectivity might be assured (see Chapter 8), but they would for the most part build on the tangible advantages offered by peer review. These advantages include cost-effectiveness. In return for travel expenses and perhaps a small honorarium, accrediting associations receive the services of experienced members of the academy as consultants and evaluators. A staff sufficiently sizeable to perform the responsibilities now assumed by peer reviewers would be unimaginably costly. Second, peer review supports the strengthening of the academy. Best practices observed by peer reviewers may prompt improvements on the reviewers’ home campuses, just as peer reviewers who observe challenges may become better prepared to offer leadership should such challenges beset their own institutions. Third, without sacrificing rigor or objectivity, peer review can create a collegial rather than adversarial evaluative atmosphere. Although the stakes are always high
when the renewal of accreditation is at issue, peer review offers an assurance that even critical observations may be not unsympathetic. Finally, peer review offers the advantage of continuity through continuing succession. Experienced consultant-evaluators retire as others sign on. Evident in the early stages of accreditation, these characteristics of peer review remain advantages today.

Are there different kinds of higher education accreditation?

There are four platforms for accreditation. Regional accreditation, the most highly visible and influential form, accredits all degree-granting public institutions and most not-for-profit private ones. Some regional accreditors also accredit some for-profit institutions. Specialized accreditation organizations accredit programs in specific disciplines, whether those programs are offered within a university or by a discipline-specific institution. Some national accrediting organizations accredit institutions and programs that are predominantly career focused and operated for profit, while others accredit not-for-profit religious colleges. These categories are not airtight.

Are there standards and principles common to all sectors?

Notwithstanding the diversity of their constituencies, most accrediting organizations—regional, specialized, national—agree that effective programs and institutions should exercise considerable autonomy, that faculty members should hold primary responsibility for curricular development and instruction, that heterogeneity among institutions strengthens US higher education, and that academic freedom contributes to educational effectiveness. The expression of such ideals may
reflect differing emphases, however. What might appear as a constraint on academic freedom in one institution may represent a precious institutional value in another.

How do the different sectors of institutional accreditation compare in size?

The six regional accrediting organizations accredit more than 3000 institutions, 96 percent of which are degree-granting, public or non-profit colleges and universities. National faith-related accreditors accredit nearly 500 institutions, and national career-related accreditors accredit more than 4000 institutions (CHEA Almanac, 2012).

How is regional accreditation organized?

Six accreditation associations (one of which, the Western Association of Schools and Colleges, is divided into senior and community college divisions) operate within their respective regions to evaluate and accredit all of the public institutions, most of the not-for-profit private institutions, and a few of the for-profit institutions. Some offer accreditation internationally as well. (See above, p. ____). The appendix lists the states for which each regional accrediting organization is responsible.

How is national accreditation organized?

National accrediting agencies offer accreditation to institutions and programs that do not qualify for regional accreditation, that choose not to pursue regional accreditation, or that find the priorities and scope of a national accreditor more consonant with their mission and character. Their standards and processes resemble those of regional accreditors. As noted above, national accreditation divides into two sectors: “faith-related accreditors [that] accredit religiously
affiliated and doctrinally based institutions” and “career-related accreditors [that] accredit mainly for-profit, career-based, single purpose institutions, both degree and non-degree” (Eaton, 2012, p. 2). While broadly indicative, these generalizations contain a considerable diversity in mission and scope that Chapter 6 will describe more fully.

May a national accreditor qualify as a “gatekeeper” to the Title IV funds described above? Yes. A list of national accreditors recognized by the USDE is available on the USDE web site provided in the Index.

Must an institution of higher education be accredited either by a regional or national accreditor? In theory, no. The process leading to accreditation always begins at the initiative of an institution. However, some states require accreditation as a condition for operation. And accreditation may be essential if the institution depends on the enrollment of students eligible for federal educational benefits.

How is specialized accreditation organized? Specialized accrediting organizations accredit programs within institutions (e.g., doctoral programs in psychology), discipline-specific schools or colleges within universities (e.g., law schools, medical colleges, colleges of education, etc.), and stand-alone institutions in some disciplines, particularly health-related ones. Specialized accreditors differ also in terms of the degree level of the programs they accredit. Many organizations, such as the Association of Technology, Management, and Applied Engineering (ATMAE), accredit associate,
baccalaureate, and master’s degree programs. Others accredit only baccalaureate programs. The American Psychological Association (APA) accredits only doctoral and postdoctoral programs, while the Committee on Postgraduate Educational Programs of the American Society for Microbiology (CPEP) accredits postdoctoral programs exclusively. Both USDE and CHEA define the approved scope of each recognized organization.

**Is there one accreditor for every academic discipline?**

No—in two respects. There are no accrediting agencies for programs in literature, history, sociology, or most other liberal arts disciplines, for instance—notwithstanding occasional calls for their creation. But some disciplines, such as business, education, or audiology, support more than one accrediting organization.

**Why would a discipline require more than one specialized accreditor?**

Accrediting organizations arise in different periods in response to particular needs and may choose to emphasize designated priorities. In business education, three agencies—the Association to Advance Collegiate Schools of Business (AACSB), the Accreditation Council for Business Schools and Programs (ACBSP), and the International Assembly for Collegiate Business Education (IACBE)—are all recognized by CHEA. The AACSB, more demanding, more selective, and more expensive, accredits for the most part complex and highly competitive programs committed to well-regarded research as well as to effective teaching. “We aspire to be the world's leading management education authority and association” (AACSB About, 2013). The ACBSP also values research but defines as its emphasis “supporting, celebrating, and rewarding teaching excellence” (ACBSP Home, 2013). And the IACBE, the youngest of the
business accreditors, was founded in 1997 to meet the needs of those “who wanted an accreditation process that was not driven by prescriptive standards relating to inputs and resources, but was mission-driven and outcomes-based.” The primary purpose of IACBE members “is excellence in teaching and learning” (IACBE History, 2013). Those schools and programs that wish to be accredited ordinarily seek out an accreditor likely to understand and support their priorities.

**Must every program be accredited if there is an appropriate accreditor?**

In some disciplines served by accreditation, not all programs choose to seek it. For instance, there are prominent programs in journalism and communication that have not sought accreditation from the Accrediting Council on Education in Journalism and Mass Communications (ACEJMC). Conversely, some smaller business programs serving limited markets choose not to pursue accreditation. But in other disciplines, such as law, engineering, nursing, or architecture—typically those that qualify students for licensure—students seeking professional qualification ordinarily must study at accredited programs.

**Are accreditors “accredited”?**

In a sense, yes. Eligible institutional and programmatic accreditors, those that serve as gatekeepers to Title IV federal student aid funding, may seek recognition from the USDE. All accreditors may see recognition from CHEA.

**Why are some accreditors recognized by USDE? Others by CHEA? And others by both?**
As indicated above, if an accrediting organization enables institutions or programs to obtain access to federal funds, particularly student aid, it must be recognized by the USDE. Correspondingly, an institution or program that seeks to offer its students access to federal student aid must earn accreditation from an accreditor recognized by the USDE. On the other hand, “CHEA recognition confers an academic legitimacy on accrediting organizations, helping to solidify the place of these organizations and their institutions and programs in the national higher education community” (Eaton, 2012, p. 8).

How many institutional accreditors have received recognition? How many specialized accreditors?

According to the CHEA Almanac, there are sixteen institutional accrediting organizations that have received recognition from the USDE, while thirteen enjoy CHEA recognition. Thirty-six specialized accreditors are recognized by the USDE, forty-three by CHEA. Thirteen institutional accreditors and seventeen specialized accreditors have received recognition from both the USDE and CHEA (CHEA Almanac, 2012).

How does an accrediting organization obtain “recognition”?

As Eaton (2012, p.5) observes, the recognition process for accreditors is similar in some ways to the accreditation process: an accrediting organization completes a self-study, hosts a site visit from the recognizing organization (either CHEA or the USDE), responds to inquiries, and eventually receives notification of a decision. The process repeats itself according to a clear schedule, usually five years for the USDE, ten years (with interim reports) for CHEA. In both
processes, a review committee considers all available information and recommends action—to the governing board, in the case of CHEA, to the Secretary, in the case of the USDE.

In order to qualify for recognition by the USDE, an agency must document that it complies with the Department’s formidable “Criteria for Secretarial Recognition” (USDE National Recognition, 2012). These criteria include the agency’s first demonstrating that the accreditation it offers is required by those it accredits *so that they may be eligible for federal funds*. The agency must then show that “its standards, policies, procedures, and decisions . . . are widely accepted” by educators, institutions, licensing groups, and employers. And it must comply with USDE expectations that it be “separate and independent” from any sponsoring organization—an issue of particular moment for some specialized accreditors.

The USDE review process seeks to ascertain that the agency operates like a proper accredditor, i.e., that it holds its members to account with respect to their financial stability, the success of their students, the credibility of the credentials they offer, the adequacy of their services and facilities, and the integrity of their recruitment practices. There must be evidence of “consistency in decision-making,” a commitment to the oversight of institutions and programs that are accredited, and, above all, evidence that the agency supervises the performance of its members regarding federal aid to students. The agency must show full awareness of “the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency” (34 CFR Part 602, Subpart B). The periodic application process to obtain continued recognition by the USDE represents a formidable challenge.

CHEA, similarly, “carries forward a long tradition that recognition of accrediting organizations should be a key strategy to assure quality, accountability, and improvement in
higher education” (CHEA Recognition, 2010, p.1). Its standards require that accreditors document how their efforts “advance academic quality,” “demonstrate accountability,” “encourage . . . needed improvement,” rely on “appropriate and fair procedures,” and include a continuous scrutiny of their “accreditation practices.” And they must also document that they “possess sufficient resources (CHEA Recognition, 2010a, pp. 4-7). While CHEA may express its standards more economically than the USDE, the essential standards of effective accreditation—determining whether an institution or program offers academic quality, making sure accurate information is made available to the public, encouraging programs and institutions to develop and pursue their own approaches to continuous improvement, and affirming that an institution or program has sufficient stability to meet the expectations of present and future students—are common to both recognition processes.

What are “diploma mills” and “accreditation mills”? “Diploma mills,” institutions and programs that grant (i.e., mail) bogus academic credentials, may claim “accreditation” from one of hundreds of self-described “accreditors.” Some are inventions of the diploma mills themselves. Others exist in name only. Some may offer a web site that purports to authenticity. None is recognized by the USDE or by CHEA.

Is accreditation the best possible form of quality assurance for US higher education? In theory, perhaps not. In practice, it has offered effective and highly economical quality assurance for more than a century. One measure of its success may be found in the demand for its services internationally. We can transpose the well-known statement by Winston Churchill
regarding democracy in describing accreditation as “the worst form of quality assurance, except for all those other forms that have been tried from time to time.”

AN EPISODIC ACCOUNT OF ACCREDITATION

The history of accreditation reflects to an extent that of the nation itself—from the acceptance in colonial times of a highly decentralized, in some respects anarchic approach to higher education, through a period of organization, consensus building, and agreement on standards, to the current highly polarized disagreements as to what accreditation should do, what it should desist from doing, and whether it should exist at all. The whole story cannot be told here, but we can review a few suggestive episodes.

States Offer Oversight

In 1787, Regents of the University of the State of New York incorporated in order to “charter, endow, and control” institutions of higher education, museums, libraries, and elementary and high schools. They visited the institutions, required reports from them, and affirmed their viability in regular reports to the NY legislature. Even though “there were no established criteria, no peer review, no group judgment, and certainly no guided self-study” a precedent for oversight was established (Young, 1983, p. 6). Some other states eventually followed New York’s example: Iowa (1846), Utah (1896), Washington (1909), Virginia (1912), and Maryland (1914). All now maintain some degree of oversight.

The Federal Government Takes a “Departmental” View

Given that responsibility for education in the US is Constitutionally reserved to states and municipalities, the chronicle of the USDE might appear counterintuitive. Granted, the limited role of the “department” on its creation in 1867 hardly anticipates its eventual rise to cabinet-
level status. But its initial charge, that of gathering and publishing information about education, remains germane to the current USDE mission and helps to inform its review of accrediting associations and agencies.

Another early charge that still informs USDE oversight of accreditation, the monitoring of federal expenditures on higher education, appears first in provisions of the 1890 Second Morrill Act for the support of land-grant colleges and universities. That charge would become more prominent with each major expansion of federal support for higher education: the “GI Bill” in 1944, the National Defense Education Act in 1958, and, as noted above, the Higher Education Act in 1965.

Finally, the “equal access mission” of the USDE, which, according its web site, reflects civil rights and anti-poverty legislation in the 1960s and 1970s (USDE History, 2012), has clearly influenced accreditation’s characteristic (and sometimes faulted) commitment to ethnic and other forms of diversity. In short, when we consider the missions of higher education accreditation—the gathering and dissemination of information, the assurance that institutions meet minimum standards of quality, the emphasis on encouraging the improvement of institutions, the auditing of institutional financial operations to assure probity and judiciousness, and the assurance of access—USDE priorities clearly have had and continue to exercise a significant influence.

*Regional Accreditors Arise*

What is a college? How might authentic colleges work together to clarify their identity and facilitate the transfer of students credentials? These were the most urgent questions that prompted the creation of the regional associations that were to become accreditors. Within a
single decade, 1885-1895, four of the six regional associations convened: New England, North Central, the Southern Association, and Middle States. The impetus in each case was different: the Middle States Association of Colleges and Schools, for instance, grew out of a meeting convened by Pennsylvania college presidents to object to a proposed property tax on colleges. But they all shared an interest in separating wheat from chaff, and they all sought to facilitate the transfer of credits. A further important precedent was set in 1912 when the North Central Association published 12 standards for the accreditation of colleges and released its first listing of accredited institutions the following year.

A National Consensus Emerges

Speaking to the annual meeting of the National Association of State Universities in 1905, E. Benjamin Andrews, the president of the association (and chancellor of the University of Nebraska) called on his colleagues to strengthen higher education, to “do something to refine the metal already so nearly pure, to strengthen the fabric now so solid” (NASU, 1905, p. 33). Later those present heard papers concerning “minimum conditions favorable to graduate work” and the “coordination of systems for admission to college.” In retrospect, an ensuing resolution “that a committee be appointed that shall report . . . upon standards for the recognition of American Universities, and upon standards for the recognition of the A.B. degree and higher degrees” seems almost inevitable (NASU, 1905, p. 9).

The minutes of the regional accrediting associations during the first decade of the 20th century all point in the same direction, towards an emerging consensus regarding how colleges should be defined, how degrees should be categorized, how students should be admitted, and how they should be enabled to transfer. The Proceedings of 1906 annual meeting of the North
Central Association of Colleges and Schools reflect the times in reporting that the association’s “committee on accredited colleges” had held preliminary discussions but had determined to defer completion of its study for the present because of “new and interesting developments relating to colleges throughout the country” (NCA, 1906, p. 61). What the committee had in mind was the work of the Carnegie Foundation for the Advancement of Teaching. Although its primary interest then lay in the “giving of retiring allowances” to professors, the Foundation sought to restrict this benefit to those who had served in acceptable institutions and, to do so, it had to adopt “an arbitrary definition of what constitutes a college” (NCA, 1906, p. 62). Brief stipulations concerning the faculty, the curriculum, and the endowment constitute the definition.

In 1907, the Foundation convened the first of what would be seventeen annual meetings of “the National Conference Committee of the Associations of Colleges and Preparatory Schools.” Reporting to his North Central Association colleagues on the 1907 meeting, George E. MacLean, president of the University of Iowa, described the charge to the committee: “to consider requirements for admission [and] matters of mutual interest to universities, colleges, and preparatory schools” (NCA, 1907, p. 44). These meetings would lead to consensus on a vocabulary for accreditation, on the “Carnegie Unit” (i.e., the credit hour), and on standards for college admissions.

Specialized Accreditation Develops

When the American Medical Association (AMA) incorporated in 1847, it appointed a Committee on Medical Education, a forerunner of its Council on Medical education that in 1904 would list medical schools in the order of their student success rates on licensure exams. Three
years later, the AMA went one step further by publishing the results of its evaluation of medical schools in two categories, approved and probationary. (Thirty-two schools made neither list.)

In 1910, a report by Abraham Flexner to the Carnegie Foundation provided both a remarkable analysis of medical education, including recommendations concerning the “course of study,” “financial aspects,” and governance, and a blunt state-by-state review of medical schools. The report concluded, for instance, “the south is in general overcrowded with schools with which nothing can be done” (Flexner, 1910, p. 186). But Flexner’s most influential contribution to the history of accreditation may lie in his attributing to the Carnegie Foundation “the attitude . . . that all colleges and universities, whether supported by taxation or by private endowment, are in truth public service corporations, and that the public is entitled to know the facts concerning their administration and development, whether these facts pertain to the financial or to the educational side.” His “accurate and fair statement of the work and the facilities of the medical schools in this country,” based on “the labor involved in visiting 150 [medical] schools,” was intended to serve not only the public, but also “the true interests of education and of the universities themselves” (Flexner, 1910, p. ix). This report, in the words of one commentator, “is viewed by most students of accreditation as the seminal event from which specialized accreditation evolved” (Booth, 1991, p. 290).

To be sure, by the time of the Flexner Report specialized accreditation had already appeared in veterinary medicine (1863), law (1893), osteopathic medicine (1897), microbiology (1899), landscape architecture (1899), forestry (1900), and family and consumer sciences (1909). But the report’s articulation of the public role and responsibilities of all higher education programs offered a point of departure for further growth. By 1935, standard-based specialized accreditation was in place also for business (1916), nutrition dietetics (1917), podiatry (1918),
occupational therapy (1923), library science (1924), music (1924), audiology and speech therapy (1925), physical therapy (1928), nurse anesthesia (1931), pharmacy (1932), engineering (1932), and optometry (1934) (See Selden, 1971, pp. A3-A4, and CHEA Almanac, 2012). The remainder of the century brought considerable further growth. Today, sixty-two specialized accreditors are recognized in a wide range of disciplines from cradle to grave (midwifery education, funeral service), from soup to nuts (dietetics and nutrition, industrial technology), and from “cats” to dogs (music, veterinary medicine).

*The NCA Adopts “Much More General” Principles*

An appreciation for the heterogeneity of US higher education as a distinct American advantage appears fairly early in the history of accreditation. The work of a North Central Association committee appointed in 1929 to make recommendations concerning a possible revision of standards led to a 1934 decision by the NCA to move from “specific standards that have to do with quantitative measurement” to “principles . . . much more general in character.” Having observed “wide variations . . . in the degree of excellence attained” by different kinds of institutions, the Commission decided to consider “the total pattern” of an institution “in terms of the purposes it seeks to serve” (Davis, 1945, p. 72). This move led to adoption of the self-study throughout higher education accreditation as a fundamental stage in the accreditation process, but its obvious significance for present practice has also a paradoxical dimension. While critics of accreditation complain that accreditors still focus more on the “quantitative measurement” of inputs (such as the frequently mentioned “books in the library”) than on issues related to quality, they complain also about the erosion of explicit standards in favor of more flexible criteria. A challenge for accreditation is thus how to expand its emphasis on meaningful results while doing
so in terms of a clear consensus on what those results should be and how they should be measured.

Landmark Legislation and the “Gatekeeper” Role

Three visionary Congressional acts in the mid-20th century led to expanded authority for accreditors and redefined the relationship between accreditation and the federal government. Paul Weissburg identifies the Serviceman’s Readjustment Act of 1944 as a “pivotal event” for accreditation even though the act says “absolutely nothing about the accreditation system” (2008, p. 94). He’s right, in a sense, in that the fraud resulting from “numerous schools of dubious quality” (p. 96) emphasized the need for a more reliable system of approving institutions for participation. The G.I. Bill’s assignment of oversight to the states clearly had not worked. Nor did 1952 legislation requiring that the Office of Education identify reputable accrediting organizations. Lacking any standards by which to make such judgments, the Office of Education simply published a list of organizations on its rolls. But it thereby “implicitly asserted that accrediting agencies were the most reliable sources for determining the quality of education and training at institutions of higher education” (Boland, 2001, p. 24). A more “pivotal event” occurred in 1958 with the National Defense Education Act’s allocation of funding for NDEA fellowships and college loans. The NDEA limited participating institutions to those that were accredited. “In other words,” Weissburg observes, “accreditation was now mandatory” (p. 100). As we shall see in Chapter 4, there are critics who lament this watershed. But a watershed it was.

Arguably the most striking expansion in accreditation’s mission coincided with the passage of the Higher Education Act in 1964. As noted above, Title IV in this legislation expressed the intent of the Congress to use federal funding to broaden access to higher education.
Having committed to this much larger role in encouraging college attendance, the federal government found it necessary to affirm that institutions benefitting from such funding were worthy of it. Rather than create a bureaucracy to monitor institutional quality, what was then the Department of Health, Education, and Welfare decided to entrust such quality assurance to recognized accrediting agencies. At that point, accreditation, already a priority for most institutions anyway, became an essential condition of eligibility for federal student aid and other forms of federal funding. The story is more complicated than that, of course. Because the HEA encouraged many proprietary institutions to seek eligibility, the Office of Education sought to manage the increasingly unwieldy environment through its own Accreditation and Institutional Eligibility Staff (AIES). Reports countered reports, and the role of regional accreditation was repeatedly scrutinized, but the broader responsibilities of accreditation in the public interest were confirmed. As Weissburg observes, the evolution of accreditation agencies into “quasi-governmental institutions” appeared conclusive (p. 104).

Accreditation Faces Tough Scrutiny

Congressional concern over dishonest and abusive practices associated with federal aid to students and the resulting escalation of defaults on student loans prompted 1992 Higher Education Act renewal legislation that called for the creation of an additional review mechanism. Even as regional accrediting organizations would be obligated to exercise more rigorous oversight of federal student aid, a postsecondary review entity (SPRE) in each state would monitor the application of federal rules. Despite considerable opposition from accreditors and from higher education in general, the USDE endeavored to implement the SPRE legislation. A “modest retreat” was evident in the rules published in 1994, though the USDE continued its
mandate that SPREs be in place by 1995 and sought to assign to them oversight traditionally the purview of accreditation (Jaschik, 1994). Eventually, reauthorization legislation in 1998 removed authorization for the SPREs. An October 1998 CHEA memorandum from Gregory Fusco to Judith Eaton affirmed that, as a result, “the relationship within the ‘Quality Assurance Triad’ of federal, state and accreditation organizations is realigned. Federal authority is reduced and voluntary accreditation is strengthened” (Fusco, 1998). True enough. But many of the concerns that had prompted the legislation in 1992—misrepresentations by institutions, defaults on student loans, and accreditor inadequacies—were not laid to rest. They remain on the table.

*Accreditation Shifts from “Inputs” to “Outcomes”*

The 1934 North Central Association standards revision mentioned above signaled an early stage in the shift from reliance on quantifiable inputs to a greater emphasis on institutional performance. That shift gathered steam with the massive enrollment increases of the 1950s that strained the “inputs” (library holdings, student/faculty ratios, student services) of many institutions and accelerated further in the 1980s with the rise of the assessment movement.

Assessment arose in part as a response to increased demands for accountability. Four influential studies (*To Strengthen Quality in Higher Education*, 1982; *A Nation at Risk*, 1983; *To Reclaim a Legacy*, 1984; *Involvement in Learning*, 1984) had argued for improvements in undergraduate education and for the more effective documentation of student learning (Nichols and Woolf, 1990, p. 81). But as the success of Northeast Missouri State University (now Truman State) was to demonstrate, assessment could also offer competitive advantages to ambitious institutions. Even more to the point, assessment offered to accreditation the prospect of making evaluation both more sensitive to institutional mission and more consistently rigorous.
The shift was confirmed in 1984 when the Southern Association of Colleges and Schools (SACS) introduced the expectation that institutions demonstrate their “effectiveness.” Other regional accrediting associations followed suit. Then at a 1994 conference described below in more detail, regional accrediting and educational association leaders agreed that they should build on efforts already under way to develop “higher standards to improve colleges, focusing on teaching and learning” (Leatherman, 1994). As will become clear, emphasis on teaching and learning has continued to evolve, from an expectation on the part of accreditors in the 1990s, both regional and specialized, that institutions and programs have assessment plans in place, to demands in the early 2000s for evidence of the operation of these plans, to more recent demands that institutions and programs show how what they have learned through assessment informs their planning and budgeting. Although accreditors should aspire to an even higher level of intentionality, the extent what already has been accomplished is impressive.

The Fall of COPA and the Rise of CHEA

In the midst of the debate following the 1992 legislation calling for SPREs, the president of the Council on Postsecondary Accreditation (COPA) surprised many of his accreditation colleagues by describing himself as “extremely pleased” by the legislation. "Reason prevailed and Congress realized that accreditation is an important part of the higher-education scene," he told a reporter for the Chronicle of Higher Education (Jaschik, S., 1992). But many disagreed with this sanguine view, most notably, the leaders of the regional accrediting associations. An organization created to create consensus among accreditors had thus magnified divisions among them. Having “spent its entire life [since 1975] in a quest for the necessary legitimacy and strength to carry out its purposes,” COPA had reached the end of the line (Boland, 2001, p. 26).
When the regional accreditors declared their intent to withdraw from COPA to form their own group, the fate of COPA was determined, and in April of 2003 COPA’s members voted to suspend operations by the end of the year.

The vacuum left by the demise of COPA—one not meant to be filled by the Council on Recognition of Postsecondary Accreditation (CORPA), an interim organization created to maintain some semblance of recognition until a more satisfactory alternative might be developed—invited institutional, association, and accrediting leaders to consider how they might sustain and improve on the objectives of COPA through a more representable, consultative, and effective organization.

The Meeting in Tucson

With COPA defunct, regional accreditation heads and higher education association leaders met in Tucson, Arizona, in January 1994, to take the initiative and the headlines away from the USDE. Through their commitment to internal reforms, they sought to disarm the efforts of the Secretary to claim many of the functions traditionally managed by accreditors. The group listened to papers it had invited and demonstrated through its discussion that it was willing to entertain far-reaching reforms, including the surrender of regional accreditors’ territorial suzerainty and a decoupling of accreditation and eligibility for federal financial aid. One compelling idea advanced for consideration called for the creation of a consensus on regional accreditation minimum standards so as to achieve consistency nationwide. Another advanced the already well-established shift to a focus on higher expectations regarding teaching and learning. And another sought to mandate far broader public disclosure of accreditation results.
Compelling ideas then—and still! But the remarks at the time of Patricia A. Thrash of the NCA proved prescient: "This was a nice mountaintop kind of place where agreements were reached. Now they have to be fleshed out" (Leatherman, 1994). They never were. Once subsequent events indicated that accreditors had overestimated both their vulnerability and the resolve of the USDE, their more radical proposals fell into abeyance. But not completely off the table. Some have been revived by critics of higher education accreditation and help to inform the recommendations of at least one friend—see Chapter 8.

*The Birth of CHEA*

The spirit of Tucson may perhaps be glimpsed in the efforts of college presidents and association leaders to create a new and more vital organization that would reflect lessons learned from the ruins of COPA in representing accreditation and the accredited more effectively. The result of these efforts was the formation in March 1996 of the Council for Higher Education Accreditation. Its mission would be broader and more inclusive than that of COPA:

"The Council for Higher Education Accreditation will serve students and their families, colleges and universities, sponsoring bodies, governments, and employers by promoting academic quality through formal recognition of higher education accreditation bodies and will coordinate and work to advance self-regulation through accreditation" (CHEA Overview, 1998).

The board of directors met for the first time in July, adopted bylaws in September, and appointed their first (and, so far, only) president, Judith Eaton, in 1996 (CHEA Report, 2009, p. 23).
Accreditation Faces Its Critics

Accreditation confronted serious criticisms in the 1980s and 1990s, but such scrutiny merely intimated the chorus of detailed, focused, and far-reaching indictments that began with the 21st century. Because the most prominent are described in detail in Chapter 4, they are mentioned here only because together they represent an important episode in the evolution of accreditation and because they demand a response that includes an appreciation of what accreditation has accomplished and of what more must be achieved within the near term.

Accreditation Reinvents Itself

Some further episodes in the story of accreditation’s continuing evolution appear in Chapters 5, 6, and 7, and some attractive prospects for accreditation’s continued reinvention constitute the emphasis of Chapter 8. But the efforts undertaken in every sector of higher education accreditation since the turn of the century demonstrate convincingly a commitment to reform that is already profound, though incomplete. Accreditation remains under close scrutiny, and it should, but it continues to make progress on several vital fronts.