

How Effective Accreditation Supports Innovation in Postsecondary Education

Introduction

Rising tuition costs. Shrinking student access to postsecondary institutions. New questions that challenge higher education as a valuable route to upward mobility. When some critics assert that higher education in America is broken, one solution offered is to reform or dismantle the nation's voluntary and independent system of quality assurance for postsecondary education, known as accreditation. Some argue that because accreditation is closely aligned with the community of post-secondary education, it is an inhibitor of innovation, the standard bearer of the status quo, and at worst, a roadblock to substantive reform.

Congress requires the U.S. Department of Education to publish a list of accrediting agencies it recognizes as reliable authorities on the quality and integrity of collegiate education, training and programs. Only with accreditation from a recognized agency, such as the Accrediting Council for Independent Colleges and Schools (ACICS), can a postsecondary institution become eligible to participate in the federal government's student financial aid programs. Accrediting agencies are the gatekeeper to federal financial aid access and, by design, an important check on how well the taxpayer's postsecondary education dollars are spent.

While scrutiny of the gatekeeper function is unavoidable, given the substantial investment at stake, the question of whether accreditation promotes or inhibits postsecondary innovation must consider a process that has been evolving since the late 19th century. While this tends to be forgotten, accreditation has not always been primarily about access to Title IV federal financial aid.

Early on, accreditation was driven largely by the frustration of secondary schools attempting to prepare their students to meet divergent and conflicting admissions requirements of various colleges and universities. Adding to the confusion, secondary

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schools occasionally dubbed themselves “colleges” while true postsecondary institutions sometimes offered secondary programs. The ambiguity led educators, business leaders and other stakeholders to insist on a system that would rationalize the higher education marketplace, improve its quality and standardize its operations. Self-governed accreditation became widely respected as a mechanism for assuring educational quality and adherence to a standards-based approach. American postsecondary education, although a relative late-comer on the world’s collegiate stage, became the envy of global competitors and the global beacon of academic access, quality and affordability. Not a bad outcome for a process so little understood.

“Accreditation” is a formal, systematic process of institutional performance appraisal. Voluntary self-regulation, regular peer review, and an on-going commitment to educational excellence are critical to the process and goals shared by accrediting agencies. While other countries have approached accreditation through government fiat or other official means, the U.S. experience suggests that an independent, self-governed system of accreditation, educational oversight and quality assurance is superior to one imposed externally. Accreditation can be improved, but like U.S. postsecondary education generally, it represents a strong foundation from which more valuable outcomes can be derived.

Delicate Balance

So how does a system built more than 100 years ago to foster standardization among disparate institutions also facilitate innovation among colleges and universities? The balance between standards and innovation is delicate and the argument for the former is compelling. After all, institutions draw credibility, prestige and reputation by standardizing credentials and the underlying curricula required to achieve them. Establishing education programs that closely resemble the accepted main stream of higher education accrues benefit to newcomers and innovators.

Accrediting agency efforts to standardize are well-intentioned, but the impacts on innovation can be restrictive, according to some critics. Likewise, holding institutions accountable for documenting processes, gathering data, or adhering to a curriculum that replicates the content, sequence and pedagogy of similar programs offered at other colleges and schools offers no guarantee of an institution’s willingness or ability to innovate. It does assure funding sources and education consumers that certain minimum expectations of quality and integrity are fulfilled.

Education draws enormous relevance from change itself. Logically, schools teaching the manufacture of buggy whips and horse drawn carriages may be excellent in everything they do but certainly fail the test of time. Others argue that accreditation itself has become hidebound, and inflexible, resistant to changing methods for assuring quality, and a deterrent to change at colleges and schools.^{3,4}

³ Donald St. Clair, *A Study of Innovation in College Business Education*, http://books.google.com/books?id=qCnzRL0yqlgC&pg=PA38&lpg=PA38&dq=accreditation+inhibits+innovation&source=bl&ots=3s3JVqlTus&sig=rquAUkr_iILA2XMy8fZrqr4q-

But have colleges and universities been unable to change, adapt, and evolve to meet new economic realities, new technologies, and new market demands? While the pressures of the here and now argue for an immediate and transformative response to pressing social and economic problems, those taking a longer, more strategic view suggest that postsecondary education is indeed changing and that accreditation has played a constructive role.

Richard A. DeMillo, director of the Center for 21st Century Universities at Georgia Institute of Technology says of the shifts in postsecondary education, “The 1910 landscape for higher education is almost unrecognizable today. A hundred years ago, when Edwin Slosson ranked universities by their reputations, there was no public funding of academic research, and his list of the top 14 elites included five public universities. Now, public research funding is huge and there isn’t a single public university in the U.S. News Top 20. The only thing we can be sure of, here in 2011, is that there’s going to be a wave of innovation over the next century, and 100 years from now, higher education won’t look the same.”⁵

Likewise, 19th century educators would see a dramatically different higher education landscape were they to survey the college landscape today. In the last 100 years, examples of sweeping change in higher education are numerous:

- The educational, operational and administrative capacity of colleges and universities expanded greatly in response to market demand, triggered in no small part by the GI Bill and Higher Education Act. In 1920, U.S. college student enrollment stood at fewer than 250,000—less than four percent of the U.S. population overall.⁶ Undergraduate education alone now reaches more than 18 million students, nearly six percent of the total population.⁷
- To improve postsecondary access and affordability, among other purposes, community colleges were formed. While once limited to certificates and two-year degree programs, some now offer four-year degrees.
- Proprietary education swelled to serve the growing ranks of non-traditional students. Between 2000 and 2009, career college enrollment grew from four percent to 11 percent of full-time students. Innovative practices of for-profit institutions include the use of experiential learning, concentrated programs as opposed to “majors”, year-round class operations, the availability of night and weekend classes, creation of convenient satellite campuses, the use of market research and demand as the predicate for program development,

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⁴ Victoria Kis, “Quality Assurance in Tertiary Education: Current Practices in OECD Countries and a Literature Review on Potential Effects, Tertiary Review

⁵ Tamar Lewin, “The Evolution of Higher Education,” New York Times, November 4, 2011

http://www.nytimes.com/2011/11/06/education/edlife/the-evolution-of-higher-education.html?_r=0

⁶ <http://education.stateuniversity.com/pages/1873/Community-Colleges.html>

⁷ The Condition of Education 2012, U.S. Department of Education, http://nces.ed.gov/pubs2012/2012045_4.pdf

a proactive approach to career preparation and placement, the use of outcome metrics, and the pioneering use of online delivery;⁸

- Private equity investors expanded proprietary education into hundreds of second- and third-tier markets, giving students the opportunity to live, work and attend college in their local community rather than needing to spend four years domiciled far away at a residential campus;
- Technology became not just a subject to be taught but an avenue for the delivery of education. More than 75 percent of American college presidents say their institutions now offer online courses and almost one in four college students have taken an online course. More than half of college students say they used laptops, tablets or smartphones in class. Only two percent of colleges restrict the use of such devices.⁹

Disruption versus Evolution

Discussion of postsecondary innovation and the need for change inevitably spill over into considerations of disruptive models and the wholesale transformation of current practice. Increasingly, innovation in higher education has become a debate between academic practitioners and policy analysts, think tanks and foundations. Practitioners, albeit vested in their own processes and methods, argue for careful study, expert deliberation, peer review, and the articulation of best practices based on data. Reformers take a more market driven and outcomes oriented approach.

Ironically, philanthropists like John Rockefeller and Andrew Carnegie helped establish the U.S. accreditation system to attempt to reform higher education. Today, philanthropy seems to support some of the higher-profile advocates of change—those most insistent that the academy reinvent itself. In the process, some of the same activists have seemed willing to marginalize the voice of education practitioners and institutional leaders.

The University of Virginia's Siva Vaidhyanathan captures the frustration of practitioners: "When we have public debates about the needs of higher education—the future of higher education—not coincidentally they track with the agendas and recommendations set forth by the Gates foundation, by McKinsey & Company, by the New America Foundation. These are considered independent resources, but basically they're putting out PowerPoint presentations—and the rest of us have to scuttle to react to their pronouncements.

⁸ Sandy Baum and Kathleen Payea, Trends in Higher Education 2011, The College Board, http://advocacy.collegeboard.org/sites/default/files/11b_3376_Trends_Brief_4Pass_110414.pdf

⁹ Kim Parker et al, The Digital Revolution and Higher Education, Pew Internet and American Life Project, <http://www.pewinternet.org/-/media/Files/Reports/2011/PIP-Online-Learning.pdf>

And so what we're not having in this country is serious scholarly deliberation about these issues, because there's so much money flowing at the punditry about higher education." ¹⁰

Much Ado about MOOCs

Massive Open Online Courses (MOOCs) are the most prominent example of a potentially disruptive model. MOOCs provide free, online courses (as opposed to degree programs) to an unlimited number of course takers (therefore potentially a massive amount). The great power of the MOOC is to untether higher education from its brick and mortar infrastructure, along with the considerable costs attendant to admissions, registration, student financial aid, student advising, career guidance and a system of institutional accountability, including self-governed accreditation.

According to one expert, "A turning point will occur in the higher education model when a MOOC-based program of study leads to a degree from an accredited institution—a trend that has already begun to develop."¹¹

The Internet has disrupted and even displaced numerous traditional business models and practices, including book retailing, newspaper publishing, television network broadcasting, travel planning, and more. Will college education be next?

While MOOCs certainly have the potential to be disruptive, many factors suggest that this technology will supplement but not supplant current forms of higher education delivery. First and foremost, fully accredited, quality assured, online education has a substantial presence in the higher education marketplace today. University level online education provides courses, complete programs and operates in tandem with classroom instruction for hybrid delivery. A survey of more than 2,500 institutions found that 65 percent deem online learning critical to long term strategy. Sixty-seven percent of academic leaders believe online education is as good as or better than education delivered in the classroom. In fall 2010, more than six million students were taking at least one online course, representing 31 percent of total enrollment.¹²

Of the three basic roles played by higher education: research, teaching, and career preparation, MOOCs pose the greatest challenge to the second and third. Even here, impediments to sweeping change loom large. An immediate challenge is the ownership of the intellectual property represented by course content. College professors developing course curriculum act as workers for hire by the institution and the course content they develop is owned by the employer. While colleges and universities may be willing to give away a portion of that content for student recruitment, image enhancement, low-risk college entry, or other reasons, they are unlikely to giveaway entire programs or the course credits that constitute the intangible currency of academia. Indeed, some major research universities have cited the need to mitigate "potential risks" to their consortium of

¹⁰ The Gates Effect, <http://chronicle.com/article/The-Gates-Effect/140323/>

¹¹ James G. Mazoue, "The MOOC Model: Challenging Traditional Education, Educause, January 2013 <http://www.educause.edu/ero/article/mooc-model-challenging-traditional-education>

¹² Going the Distance, The Sloan Consortium

institutions posed by MOOCs, and have acknowledged publically the need to address “intellectual property and revenue sharing in a reasonable and equitable way.”¹³

Some colleges and universities accept credits from university-based learning portals such as EdX, Audacity, and Coursera and from low cost online course providers such as Straighterline. In the future, other MOOCs could be operated by corporate trainers, freelance academicians, publishers, trade unions, associations and other non-university players. The extent to which such credits would be accepted in partial fulfillment of a traditional college degree remains unclear, largely because the oversight of and quality assurance behind such credits would be similarly unclear. MOOCs address the problems of postsecondary cost and scale, but foster new questions about quality, the suitability of learning pedagogy, the credibility of credits earned, and accountability outcomes generally. The skeptics include well-respected authorities on workforce development who would require Mozilla Badges, Degreed and Coursera to assess “what people learn and whether they found jobs.”¹⁴

Other Innovative Learning Models

If MOOCs challenge the business model and structure of higher education, proposals surrounding competency-based education question whether the means to learning, critical thinking and skills development are as important as the ability to simply demonstrate that these qualities have been attained.

Western Governors University is a leading practitioner of competency-based education. The institution’s approach allows its online students to pay one price, to take as many self-paced classes as they would like in a six-month term, and to prove that they have mastered the subject matter in each through test-taking, regardless of how quickly that can be done. It’s an approach that implicitly acknowledges that when it comes to learning, there are sprinters, long distance marathoners and every type of runner in between.

Other approaches recognize that college level learning may have taken place outside of college. The [National College Credit Recommendation Service](#) at the University of the State of New York (National CCSR) evaluates the course offerings of organizations for college credit. National CCSR traces its roots to the National Program on Non-Collegiate Sponsored Instruction, founded in 1973. The organization reviews the credit worthiness of business training offered by companies, trade unions, local government agencies and others, using teams of subject matter experts to make in-depth, curriculum reviews.

Similarly, the Council for Adult and Experiential Learning, with support from foundations like Lumina, Joyce and Kresge, offer students a prior learning assessment service, including the development and assessment of a learning outcomes portfolio. CAEL assesses these prior learning student portfolios and, as appropriate, assigns credit. Services like those offered by CAEL potentially

¹³ CIC Online Learning Collaboration: Vision and Framework, June 15, 2013

¹⁴ Anthony Carnevale, Director of Georgetown University’s Center on Education and the Workforce, commenting in “Degreed wants to make courses count,” Forbes Magazine, August 15, 2013.

offer students a pathway for converting the learning gained in non-credit MOOCs into college worthy PLA credits, although to date, according to one report, CAEL has no students seeking to turn MOOC courses into credit.^{15, 16}

Do accrediting agencies stand in the way of these efforts to bring more students into higher education? Hardly. While the evaluation criteria for a grant of competency-based credits must be rigorous to maintain academic quality and integrity, many accredited colleges and universities have their own assessment programs or participate with organizations that perform this function. According to the American Council on Education, more than 2000 institutions of every type recognize its ACE Credit recommendations, a process that translates formal courses and training taken in the workplace into college credit.¹⁷ CAEL claims affiliated universities in 35 states as well as 12 online institutions.¹⁸

Approaches such as competency-based and prior assessment challenge the notion of the credit hour as the ultimate calculation and deciding factor in academic creditworthiness. Accrediting agencies like ACICS approach these innovations in a manner that balances academic quality and postsecondary reform, the need to maintain rigorous standards and to strive for continuous improvement. As a result of this nuanced approach, accreditors are sometimes criticized for resisting changes that reform champions argue will improve college access, affordability and completion. These goals are meaningless, however, if they do not advance the attainment of learning and skills. Amidst loud and growing calls for change, true innovation must be carefully identified, explored and tested. To do otherwise risks the nation's massive investment in higher education, creating incentives for fraud and abuse.¹⁹

Some might argue that the marketplace is the de facto judge of knowledge and skills. Companies know what they want of the employees they hire; how talents and abilities are achieved is of secondary importance. If McDonald's University produces the best educated workers for McDonald's restaurants, so be it. Companies, trade unions or associations providing their own specialized forms of education and training also have a financial incentive to maintain the quality and integrity of those services. And, if profit is not motivation enough, third-party groups or foundations composed of outside experts could license and certify graduates. In the future, why not establish organizations to independently accredit non-collegiate education and training providers?

Perhaps that will happen. If so, the new accreditors will run into the same challenges confronting the old accreditors: the need to maintain standards and assure quality while nurturing innovation and continuous improvement. Education providers will operate with very different educational missions, goals and objectives, processes and methods, and different interpretations of quality and value. With multiple forms of accreditation and multiple accrediting agencies, innovation in

¹⁵ Prior Learning Assessment and Accreditation: An Outcomes Perspective, CHEA 2013 Summer Workshop

¹⁶ Steve Kolowich, "The MOOC 'Revolution' May Not Be as Disruptive as Some Had Imagined," Chronicle of Higher Learning, August 8, 2013

¹⁷ <http://www.acenet.edu/news-room/Pages/College-and-University-Services.aspx>

¹⁸ <http://www.learningcounts.org/affiliated-universities/>

¹⁹ Paul Fain, "Hour by Hour," Inside Higher Ed, September 5, 2012

postsecondary education delivery could lead to a meaningless muddle. This new breed of alternative accreditors would be forced to rationalize the marketplace, implement checks and balances, and place their own harness on unbridled and unaccountable change. History would repeat itself.

Institutional Accreditor: Gatekeeper or Prudent Promoter?

As this discussion has made clear, postsecondary education has dramatically evolved to meet society's changing demands, needs and expectations:

- Institutions expanded the nation's postsecondary capacity to serve more students. The number and type of Title IV eligible, degree-granting institutions has grown in the last 30 years from approximately 3,200 to almost 4,500—a 40 percent increase.²⁰
- The total number of private, not-for-profit college and university campuses has increased from just fewer than 2,000 in 1990 to more than 3,000 in the 2011-2012 academic year, an increase of 50%. The number of for-profit, degree-granting college campuses has increased from 343 to 1404 in the same time frame, or a four-fold increase.²¹
- Institutions began to serve a more diverse student population. The number of Black students earning baccalaureate degrees increased from just over 60,000 in 1980 to almost 165,000 in the 2009-2010 academic year. The number of Hispanic students earning baccalaureate degrees increased from roughly 22,000 to over 140,000 in the same time period.²²
- Degree programs diversified to address local market skill demands in areas like alternative energy (wind and solar technicians), non-traditional medicine, sustainable business management, even guide and security dog training. By the 2007-2008 academic year, career colleges offered programs in over 500 occupational areas.²³
- Institutions embraced the Internet for course management and delivery. According to a report by the President's Council of Economic Advisors, the postsecondary education expenditure on eLearning, defined as the use of electronic technology to facilitate learning, totals more than \$24 billion, 10 times the eLearning spend rate in K-12 education.²⁴
- Institutions are increasing their emphasis on outcomes, not just inputs. The career college sector, with its mandate to provide students with career education and to help graduates find suitable work, has always maintained a hard focus on outcomes. Accountability is becoming a growing concern across academia.

²⁰ <http://nces.ed.gov/fastfacts/display.asp?id=84>

²¹ http://nces.ed.gov/programs/digest/d12/tables/dt12_306.asp

²² http://nces.ed.gov/programs/digest/d11/tables/dt11_300.asp?referrer=report

²³ Association of Private Sector Colleges and Universities

²⁴ http://www.whitehouse.gov/sites/default/files/unleashing_the_potential_of_educational_technology.pdf

Certain prejudices dilute and diminish the potential for innovation in postsecondary education. Transfer of credit bias acts as an electrified fence of higher education, containing the spread of career education and disrupting the advancement of often non-traditional students from certificate and associates degree programs into four-year and graduate degree programs. While no informed observer argues that transfer of credit should be automatic, no reasonable person would argue that transfer of credit should be automatically rejected. The transfer of credit decision should not be solely based on the accreditation source of the sending institution, but on an analysis of multiple factors, including program and course content.

The Council of Higher Education Accreditation (CHEA) agrees, stating, “Institutions and accreditors need to assure that transfer decisions are not made solely on the source of accreditation of a sending program or institution.”²⁵

While transfer of credit can be a significant problem in attempts by students to transfer credits from one regionally accredited school to a second regionally accredited school, and even between schools accredited by the same regional accrediting agency, a significant barrier also persists between regionally and nationally accredited schools. The bias against nationally accredited schools is widely held among traditional colleges and universities, notwithstanding the fact the processes of regional and national accreditation are substantially similar. Transfer of credit reform would promote college retention and completion, foster educational continuity, and contribute significantly to the attainment of workforce skills and credentials.

The trade guild mentality may also be a barrier to innovation, regardless of by whom or how it is practiced. In particular, programmatic (as opposed to institutional) accreditors are occasionally criticized on this basis. One survey cites a respondent calling programmatic accreditors protectionist, an inhibitor of innovation, and the mechanism for tighter faculty control. Accrediting agency standards and norms are sometimes used as the convenient rationale to block innovation.²⁶

Regulation can also be a significant roadblock to postsecondary innovation. Federal rules changing the credit hour definition exemplify oversight that applies one foot to the gas pedal and the other foot to the brake. Arguably, federal imposition of this standard crosses over into an attempt to define academic quality, a role that regulators are ill-prepared to assume. While the federal government appears to be an advocate of capacity building mechanisms like online learning, attempts to impose a rigid metric on educational value runs counter to this advocacy.

Principles for Moving Forward

Innovation turned the black rotary dial phone into the smartphone, the mainframe computer into a tablet, the bookstore into Whispernet, and the photo lab into Instagram. Everything defends its

²⁵ A Framework for Meeting Transfer of Credit Responsibilities, Institutions and accreditors need to assure that transfer decisions are not made solely on the source of accreditation of a sending program or institution.

²⁶ Laura Palmer-Noone, Perceived Barriers to Innovation: First Report from a Study on Innovation in Higher Education, http://www.intered.com/storage/jiqm/v10n2_noone.pdf

right to exist, yet in time everything changes. So too with higher education. Accrediting agencies are the stewards of that change, preserving what is best about current postsecondary practice while encouraging institutions toward continuous improvement and greater quality. The historical record clearly shows that U.S. higher education has both been able to grow and change while becoming and remaining the global leader.

Logic suggests that while ways and means may need to adapt, accreditation's record of success should be preserved. For this to happen, ACICS believes that any proposals designed to foster postsecondary innovation by reforming institutional accreditation must be based on the following principles:

- Accreditation must remain self-governing with practitioners and subject matter experts best positioned to recognize and nurture quality and standards and apply them judiciously to innovative and transformative education delivery models;
- Accreditation must be reasonably market-driven, recognizing that while society and culture undergird the need to pursue “knowledge for knowledge’s sake,” the ability of college to link education and jobs responds to the expectations of many stakeholders, including students, parents, taxpayers, and elected officials;
- Assessment of educational standards and quality, regardless of the mode of instruction, must be based on peer review. Peer review is fundamental to top professions, including engineering, healthcare and law. To decouple higher education assessment from peer review would be no less reckless than placing engineering or healthcare decisions in the hands of laymen;
- Accreditation must make the institution’s demonstration of continuous improvement a major requirement in successfully gaining or retaining this recognition. Accrediting agencies must strike the “delicate balance” between standards and change while understanding the fact that higher education can only be considered of high quality to the extent that it remains highly relevant;
- Changes to accreditation and the recognition of accrediting agencies must balance risks and rewards. Replacing or dramatically expanding the current accreditation structure stands to weaken, not strengthen higher education;
- Accreditation review and oversight must be maximally effective and minimally intrusive, recognizing that while much in the way of new ideas, novel approaches and best practices can be shared as a part of an accreditation review, the campus community itself remains the most fertile ground for postsecondary innovation;
- Accreditation must balance accountability with quality improvement. A rigid emphasis on compliance, documentation, and record-keeping may eclipse efforts to improve the quality of education itself. Accountability must assure that institutions meet minimum standards

but not become the predominant criteria by which achievement of the education mission is judged;

- Accreditation must be sufficiently transparent and open to broad stakeholder participation so as to preserve credibility. Contacts and collaboration should be encouraged as a means of fostering better understanding and an improved environment for transfer of credit reform;
- State Authorization Reciprocity Agreements should be used to eliminate barriers to the operation of schools across state lines or by schools with campuses in multiple jurisdictions. Current federal regulations requiring state by state authorization limit the ability of institutions to scale up innovations to serve multiple campuses and more students;
- While U.S. higher education is pre-eminent, globally leadership is earned, not guaranteed. Universities in China, India and elsewhere are gaining ground in the competition for the best and brightest. Mutual recognition by international accrediting bodies will allow U.S. accrediting agencies to share best practices and learn from the innovative examples of others.

Conclusions

To meet the test of these demanding times, higher education must adapt, change and improve. Accreditation must be a facilitator, not an impediment, to that forward motion. Accrediting agencies must perform this role while safeguarding standards and upholding quality, accountability and integrity. These goals are not inherently contradictory or mutually exclusive. “Innovation” implies change in a positive direction. Positive change can only be achieved when built on a solid foundation of knowledge, understanding, trust and public confidence in an established system of accountability.

Since the dawn of the 20th century, accrediting agencies have operated with the confidence and support of the American people. Today, pressures for greater accountability and better outcomes in higher education have triggered companion pressures on accreditation itself. How lawmakers and higher education policymakers meet these pressures will say much about the future of college education.

Likewise, the extent to which colleges and universities embrace technology and new modes of education delivery will determine the extent to which they retain their hegemony over postsecondary education--and the extent to which new players and providers will enter and disrupt this space.

The evidence suggests that while accreditation has worked well in the past to foster meaningful and productive innovation, policy obstacles left unaddressed could undermine this process in the future. Fortunately, an affirmative public policy agenda exists to help accrediting agencies continue to encourage innovation while helping institutions maintain the delicate balance between quality in the form of standards and innovation in the form of potentially disruptive, non-traditional modes of education delivery that reflect the contemporary needs of the community.

ACICS stands ready to assist policy makers as they work to craft the necessary reforms.