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U.S. Senate Health, Education, Labor, Pensions (HELP) Committee Staff White Paper on Higher Education Accreditation

Formal Comments from Woodrow Wilson Foundation President Arthur Levine

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As Senator Alexander and the Senate Health, Education, Labor, and Pensions Committee examine the quality and impact of higher education in the United States, accreditation stands as one of the most important tools available to strengthen postsecondary education. Accreditation ultimately sets the standard for all colleges and universities to achieve. Underlying this standard, though, is the hope that all institutions of higher education will strive to exceed the standard, seeking the innovation and outcomes that will keep our position of having the strongest higher education system in the world.

Reflecting on the white paper put forward, following are some observations on accreditation in general, as well as some recommendations for the Senate to consider as it begins to reauthorize the Higher Education Act.

The Functions of Accreditation

There are four interrelated functions varyingly suggested for accreditation: 1) setting minimum institutional standards; 2) building institutional capacity; 3) assuring institutional quality for third-parties; and 4) providing consumer information. Each of these standards is strongly recognized in the white papers the HELP Committee has put forward as part of the process to reauthorize the Higher Education Act.

Setting minimum institutional standards

The rationale for accreditation is to enable colleges and universities to engage in self-regulation by establishing explicit standards for themselves and creating a mechanism to enforce them. At the moment, those standards operate as a floor, delineating the minimum quality necessary for institutional acceptability. It would be desirable to create something more akin to a ceiling. This might be accomplished by shifting from the current pass-fail system of accreditation with gray areas in between to a system including varying levels of pass such as meets standards, exceeds standards, and substantially exceeds standards. Rather than giving institutions a single grade of pass or fail, they could be rated in each of the key accrediting areas—such as students/access and graduation rates, program quality, governance—as well as receiving an overall rating.

Building institutional capacity

For all intents and purposes, building institutional capacity is the way that accreditation has historically worked to create a ceiling. However, the result is a hazy system which appears the equivalent of let a thousand flowers bloom. A more differentiated system of ratings could be a vehicle for adding rigor to capacity building if it allows for institutional diversity.

Establishing quality assurance for third parties

The most powerful form of third-party reliance is qualification for federal financial aid. This is a mixed blessing. On the one hand, it is an acceptance of professional self-regulation in higher education. On the other, it makes accreditation a high-stakes determination, which means giving the benefit of the doubt to colleges and universities and thereby lowering the floor. Realistic alternative routes to financial aid are the only possible ameliorative.

Providing consumer information

It has been suggested that accreditation provide the same sort of information as *U.S. News and World Report* or the popular college guides. Doing so, though, would be in violation of the confidentiality essential to self-regulation and peer review. However, publicly releasing more differentiated ratings and requiring all accredited institutions to release standardized data in key areas such as access and graduation rates would make an important contribution.

Potential Changes in Higher Education with Likely Impact on Accreditation

Shifts in demographics, economics, technology, and globalization are likely to change who is going onto postsecondary education, the characteristics of postsecondary education, and the interaction of students and postsecondary institutions.

Student Demographics

Traditional students—18 to 22 years of age, attending college full-time and living in residence—now constitute less than 20 percent of undergraduates. That percentage is likely to decline further as the price of college rises beyond the means of most families and as continuing education mushrooms as baby boomers retire and work demands more frequent updating. Today's traditional students are more consumer-oriented than their predecessors, expecting institutions to meet all of their wants—academic, counseling, room, board, support services, technology, and social life. These demands result in an expensive competition among institutions to add the newest and largest bells and whistles.

The new majority in higher education are part-time, working, and greater than 25 years of age. They are seeking institutions which offer them convenience, service, quality education, and low-cost. They are unwilling to pay for facilities, programs, and services they do not use, including natatoriums, elective courses, and intramural sports. These are prime candidates for stripped down versions of higher education, offered by on-line and non-traditional providers such as University of Phoenix and Kaplan, among others.

This demand for such education is likely to accelerate in today's global information economy in which the half-life of knowledge is growing shorter and shorter, causing students to return to postsecondary institutions throughout their lives, seeking just-in-time rather than just-in-case instruction, tailored to their personal needs in content, calendar, and learning style.

The migration patterns of Americans will also have an effect on higher education. Americans are moving from the Northern and Eastern regions of the country to the South and West. The WASC accreditation region, for instance, is growing quickly due to this shift and immigration, creating a mismatch between the availability of higher education and student demand, particularly in California. This is likely to bring an influx of non-traditional, for-profit, and out of state higher education providers to the region to meet the need.

This promises to exacerbate the condition of Hispanic, Black, American Indian/Alaska Native, and Asian/Pacific Islander populations as well as the poor, who have low high school graduation, college attendance, and college completion rates. Even those who attend college are likely to be over-represented in non-university based postsecondary education.

Postsecondary Providers

The years ahead are likely to bring a dramatic expansion in the number and types of education providers. Building on the existing providers, we will continue to see for-profit and not-for-profit; brick, click, and brick and click; local, national, and international; and combinations thereof.

This will be propelled by a for-profit community, a sector that has been under a great deal of scrutiny in recent years. It is also an industry in need of a makeover because it is relatively high in cost, inadequate in leadership, low in productivity, and weak in technology use. Higher education is also attractive to the profit-making sector because it is seen as a growth industry, countercyclical in enrollment, subsidized by government, dependable in cash flow, and a long-term purchase.

The convergence of knowledge producers will further spur the growth of non-traditional education providers. Today, content and technology companies—publishers, software and hardware makers, media companies, libraries, museums, and universities—are all trying to build their market using the same technologies and creating products that look increasingly like courses. As an example, several years ago I visited a publisher that was providing professional development to teachers in 15,000 schools online. This publisher was competing with universities to hire experts to produce their content and seeking state approval to grant credits and degrees.

States with insufficient higher education capacity, as noted, will accelerate the growth of this sector as well.

Students and Postsecondary Providers

The expansion of the postsecondary sector will offer students far greater choice in where, what, and how they study. One can expect more mixing and matching. That is, studying at a variety of different traditional and non-traditional institutions, which can be expected to distinguish themselves by area of specialization, length of their courses of study, choice of instructional delivery systems, and cost. This, combined with advances in brain research with regard to learning and the development of software tied to those advances, will permit students to select the course of study most consistent with their personal needs and learning styles. Instruction is likely to be available to students 24 hours a day, seven days a week at the location of their choice—at home, at work, on the commuter train, on vacation, or in a hotel room. Postsecondary education is for the most part provider driven. In years ahead, it will become increasingly consumer-driven, particularly in the manner of media.

Today, higher education is largely time-based. The amount of time in a classroom determines the number of credits earned, which when accumulated in sufficient number results in a degree. The idea of tying education to the clock makes less sense today. We recognize that all people learn at different rates and each person learns different subjects at different rates. Accreditation efforts in the future will need to better appreciate how the competency-based education model works and how to set high standards for it.

The shift of America from an industrial to an information economy is speeding this realization and action upon it. Industrial economies focus on establishing common processes and the American university with its course-credit system came of age during the industrial era. In contrast, information economies are concerned with outcomes. Process and time are variables. This is profound change, shifting the focus of education from teaching to learning. All of our educational institutions, pre-K through graduate school, are being pushed reluctantly in this direction by government, which is demanding specific outcomes, data, and

accountability. Pre-collegiate education is adopting this approach much more quickly than higher education, which ultimately will have the option of developing its own metrics or having the metrics thrust upon it by government.

Combine this with the expansion of non-traditional providers and the diversity of their educational offerings. Students, in the course of their postsecondary lives, are likely to have had an assortment of learning experiences which may vary from a few hours to several years offered by a host of different providers. This does not translate easily into credits and degrees. Moreover, postsecondary training by employers is more likely to focus on mastery than time. As a result, given society's shift from process to outcomes and the lack of common meaning associated with academic degrees beyond time served, it would not be surprising to see degrees wither in importance in favor of competencies, detailing the skills and knowledge students have mastered. Every student would have a lifelong transcript or passport in which those competencies are officially recorded.

What Does This Mean for Accreditation and HEA Reauthorization

The preceding observations are an attempt to read the tea leaves. Past efforts to predict where higher education was headed have not been wholly successful. But changes are likely to occur. They may occur by evolution or they may be abrupt, but change is coming. And with impending change, there are several accreditation-specific suggestions the HELP Committee can take into account as it plans the reauthorization of the Higher Education Act, including:

Expand the scope of institutions eligible for accreditation based more on student enrollment choices than institutional characteristics such as degree-granting status.

Follow student academic careers to gage the nature of their educational progress in a system in which they may study with multiple providers.

Develop common standards for regional accrediting associations in order to avoid non-traditional providers shopping for the easiest possibility.

Develop additional categories for accreditation—meets standards, exceeds standards, substantially exceeds standards—in order to go beyond the floor accrediting currently establishes, to aid institutions in capacity building, and to inform consumers. Institutions should receive ratings in key areas such as academics, governance and finances as well as an overall assessment.

Place primary emphasis on the outcomes of postsecondary education, determining what data institutions should provide to regional accreditors and what information to the public. This could be a vehicle for providing more frequent updates to accrediting bodies and reducing the paperwork, hubbub and cost associated with accreditation.

Plan for an outcome or competency-based system of postsecondary education.

A competency-based system is likely both the most significant change that will face postsecondary education and the change feared most by the system itself. In preparing for a system focused on mastery of subject matter, there are several questions that the HELP Committee and the higher education community must honestly address:

- What would competency-based postsecondary education look like?
- What is the definition of a competency?
- How can we insure that competencies go beyond vocational skills and knowledge to include civic and personal outcomes?

- What are the appropriate assessment and transcript recording mechanisms and actors?
- Should institutional accreditation be rooted in the competencies a postsecondary institution seeks to achieve?
- What is the meaning of traditional process concerns in outcome or competency-based education in areas such as facilities, teaching methods, the role and kinds of faculty employed, support service such as libraries and staffing?
- Where does responsibility for access, completion, employment, financial aid, etc. rest in a world in which students may have educational experience with a host of providers?
- What role should accrediting bodies play as these changes unfold? Is it one of shaping or reacting?

Perhaps this offers more questions than answers, but these are key issues that the U.S. Senate will need to address if it is serious about redesigning and reforming accreditation to strengthen the quality of colleges and universities.

Arthur Levine is the sixth president of the Woodrow Wilson National Fellowship Foundation. Before his appointment at Woodrow Wilson in 2006, he was president and professor of education at Teachers College, Columbia University. He also previously served as chair of the higher education program, chair of the Institute for Educational Management, and senior lecturer at the Harvard Graduate School of Education. Dr. Levine is the author or co-author of ten books and dozens of articles and reviews, including a series of reports for the Education Schools Project on the preparation of school leaders, teachers, and education researchers. Dr. Levine's numerous commentaries appear in such publications as *The New York Times*; *The Los Angeles Times*; *The Wall Street Journal*; *The Washington Post*; *Education Week*; and *The Chronicle of Higher Education*. His most recent book is *Generation on a Tightrope: A Portrait of Today's College Student* (with Diane Dean, 2012.)

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