

ACCREDITATION AND ACCOUNTABILITY

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More often than I want to admit, I am so flattered to be asked to share some time with a distinguished group that I accept, only to wonder when I start to craft my comments whether I really have anything useful to say. And so it was with your invitation and the quandry I ultimately faced up to as the time drew closer for my being here today. I know I can be informative, for I am smack in the middle of the arcane but important process of negotiated rulemaking with the Department of Education, and things are changing on that process weekly. While that might be of limited interest, even if I could be successful in sexing up an account of the negotiations—and you should know than an astute external observer has described our public meetings as “real snorers”—I would only be touching a small, albeit more important that some realize, part of a major struggle over the nature and purpose of the academy in the United States.

To say something that might be both informative and useful, I need to place these negotiations in that larger context: the struggle over the nature and purpose of the academy in this nation. My attempt to do this comes with the full realization that I will be significantly oversimplifying the sociopolitical and economic roles of higher education in the United States. The trained historian in me yells for this kind of hedging even as I move forward.

It is axiomatic to say that higher education is in a period of extraordinary, even seminal, change. It has been for at least the last twenty years. Let me capture my sense of the scope of the changes in a few quick images and examples:

- the University of Phoenix brand on a building in a relatively new suburban industrial park probably here in St. Louis, and probably in many of the cities and town from which you come;
- the recently publicized plans for the University of Illinois to mount its new Global online venture;
- the advertisements for baccalaureate and masters degrees delivered on the community college campus, sometimes by the community college itself;

- the advertising pages filled with competing, off-campus graduate programs, particularly in business and including much publicized collaborations such as the one between Kaplan University and Newsweek Magazine;
- the morning announcement on public radio that “Morning Edition” is in part sponsored by some degree program offered by a major research university;
- the higher education banners that flash across your computer screen whenever you Google; and last but not least,
- the new higher education models of collaborative eLearning graduate programs shared by multiple universities through organizations such as the Institute for Academic Alliances housed at Kansas State University.

In short, quality higher education escaped the confines of the campus years ago and quality higher education is created through partnerships once thought to be undesirable if not impossible. Delivery of quality higher education is a huge business rapidly making myth of the concept of the campus as a space set aside from all sorts of social and economic pressures the better to allow for “sifting and winnowing” of truth. As a graduate of the University of Wisconsin, I remember seeing those words hewn into stone over the entry of a building somewhere on the campus. I don’t think it was the library.

Neither the physical campus nor the singular, autonomous university will be the operative models for higher education in the 21st century. I’m sure many of you have in one way or another either shaped some of these changes or at the very least have been touched by them. When it comes to incorporating technology into support systems for new learning environments, I am conscious that libraries in general and research libraries in particular, have played a key role in enabling quality higher education to escape both the physical boundaries of the campus and ownership and control of the institution. You have been leaders in creating strategies for sharing resources early on by passing around the physical book or document and now by digitizing them for easy access, use, and sharing. For an agency that accredits institutions, you have to understand that these changes have challenged at every point a quality assurance program that assumes the autonomy of each institution or too often tries to push all of this change into an institutionally-specific package.

So we all deal with major shifts in higher education funding, in creating effective learning environments outside of the classroom, in recasting roles of faculty and staff, and so forth. The universities you work in today, I would guess, have changed in more fundamental ways in the last twenty years than they had in the previous fifty, and my guess is that all of you know that you are not done with that change, but probably just about in the middle of it. Several have argued that higher education is going through a transformation as seminal as what it experienced in the late 19th century when the modern research university emerged and came to define much what constituted quality in 20th century higher education.

But there is an even larger change afoot that fuels the very visible public policy struggles over higher education, and the hyperbole that marks too much of the discussion suggests the basic nature of it all. It simply—and this may be an oversimplification—boils down to who defines the nature and purpose of higher education in contemporary society. It pits the academy with its history and traditions, its sense of calling and purpose, and its unique structures of control against others who consider themselves to be important stakeholders in the quality and utility of higher education. Some have argued that the accountability demands in the U.S. come from legislators embarrassed by their own unwillingness to invest in higher education and, therefore, anxious to place blame elsewhere. I think there is something more profound going on, and I hope that will become clear as I discuss the latest calls for higher education accountability.

Demands for accountability in higher education are hardly new. In the 1980s several states tried to find ways to measure higher education productivity and to reward evidence of increased performance. The accountability movement then appeared to be fueled by the sense that colleges and universities had little sense of what they were trying to do let alone whether any of them were actually doing it. To some extent today's hew and cry hits the ear as being the same old song but sung by new people. You can determine what is the refrain and what is the verse, but try these: the higher education industry simply is incapable of or refuses to rise to the challenge of being publicly transparent about its productivity and effectiveness; it is too expensive, too accepting of academic failure, too prone to being protective, reactive, and defensive, and too much in the thrall of discipline-oriented, coddled faculties. We in higher education argued in the 1980s and argue now that higher education is too complex an industry

for any simple, easily understood set of performance measures. Watch the accounts of why negotiated rulemaking about accreditation will fail, for at its core, the smashup will be about the Department of Education's effort to get some traction on university performance measures through accreditation, and the higher education industry will scream about federalization and performance expectations that are too, too simple. "One size fits all," is the key criticism.

But there is an important difference in this version of accountability even if the flap over negotiated rulemaking fails to capture it. The much-ballyhooed report of the National Commission on the Future of Higher Education, often referred to as the Spellings Commission report but titled "A Test of Leadership," is only the most highly visible call for accountability in the first decade of the 21st century. The Business and Higher Education Forum in early 2004 released its own forecast of the future challenges for higher education and entitled it "Public Accountability for Student Learning in Higher Education: Issues and Options." It served as the basis for a Wingspread Conference that fall where the selected participants wrestled with how best to engage the higher education community in owning and responding to those challenges. BHEF is a kind of brain trust now with its own office and staff, and is composed of a self-selected group of industry and university chief executive officers, including some of your bosses. A little under a year later the State Higher Education Executive Officers, or SHEEO, published a report "Accountability for Better Results: A National Imperative for Higher Education." This report summarized the work of the SHEEO-founded, Ford Foundation-funded National Commission on Accountability in Higher Education the key members of which were public policy makers and SHEEO's. Leaders of industry, of major research universities, of state higher education executive offices, and state governments all appeared to read off the same song sheet in 2004 and 2005. Then came the Spellings report and soon thereafter a series of reports from various other groups including the National Conference of State Legislatures and the National Center on Education and the Economy. ATS entered the accountability chorus with its own essay on the culture of evidence that essentially outlined the difficulties of creating trustworthy instruments appropriate to accountability. Same song, really, but lots of interesting harmonics.

At the risk of oversimplifying these reports, their diagnosis of the future challenges for higher education in the United States is pretty much the same:

- To provide higher education to more students, especially students of underserved groups because within a short period of years those students will be the majority of students seeking higher education;
- To ensure that higher education sets higher expectations for the learning achieved by all of its students;
- To ensure that more students complete degrees and acquire appropriate certifications;
- To create learning environments that support life long learning; and
- To do all of this with greater efficiency and productivity; in short, without more money.

The SHEEO report also shines a special light on the need for higher education to be more productive in conducting basic as well as applied research while the Spellings Commission drew attention to the need for strong STEM programs.

By and large these reports, although differing in the solutions they provide to these challenges, share a specific view about the purpose of higher education in the United States. Namely, that in this newly flattened world, the United States is reliant on its colleges and universities to ensure that the nation is not only highly competitive but continues to be the recognized leader in most aspects of the global knowledge economy. These reports, therefore focus on how colleges and universities must provide the nation with both sufficient and necessary intellectual capital by providing the learning required by a high level workforce in the high tech global economy.

In all of these documents, the term “accountability” is linked directly to the achievement of these broad national goals. Despite the various differences within these reports, one significant thread of consistency among all of them is the prevailing view that colleges and universities should be measured by how they meet these national goals, not solely or even primarily by how they meet their own institutional goals.

Over the past fifteen to twenty years, those of us in regional accreditation have invested lots of time, energy, and money into integrating assessment of student learning into our standards and our accreditation processes. However, the SHEEO report noted explicitly that the institution-based, mission-focused approach to assessment of student learning quite simply fails to meet the needs of accountability. The Spellings Commission report dismissed assessment in a couple of sentences. During its year of study the National Commission hosted a whole series of hearings across the nation and still walked away apparently with no real sense as to what the assessment movement is about. Moreover, almost all policy makers on the Hill, we have discovered, are equally clueless. Regional accrediting agencies find that our claims about our diligent efforts on assessment either fall on deaf ears or come across as self-serving or, I fear, just seem like one more secretive, private aspect of higher education that results in almost nothing actually useful to the general public. Who, after all, publishes the massive information that might make assessment useful as a consumer tool?

For almost twenty years the Higher Learning Commission along with other regional commissions have been preaching, cajoling, and demanding attention to the fundamental importance of assessment of student learning in the management of institutions of higher education. Back in the early 90s we understood that if we wanted these tools to have any meaningful impact on the institution, we were really talking about shifting the educational culture from an emphasis on teaching to an emphasis on learning, a shift that in the long run should redound to the benefit of students and the ultimate educational performance of the institution. By focusing the emphasis on assessment of student learning we took on the larger task of making assessment a fundamental tool in the realignment of the educational culture in each college and university. This shift in culture—and it is happening slowly and on a very uneven basis—is, by the way, one major component of the larger transformation occurring in higher education. We hope it will improve the quality of the learning achieved by students, but in and of itself, however, it is not going to satisfy the demands for accountability.

As colleges and universities mount the arguments about the need for greater public investment to achieve these national goals, they inevitably face the countervailing demands for transparency and accountability. I have heard it argued quite persuasively that increased public

investment is dependent on a compelling case that there is a direct relationship between new or renewed investment and the willingness of higher education to document effectiveness and productivity. Our faculties, barely comfortable with questions about the effect of their learning environments on the learning of students, may well be learning that it is not enough to ask “Are my students learning what I want them to learn?” Accountability is driving another question: “Are we as an institution or program doing as good a job for our students as other similar institutions and programs are doing for theirs?” Even if benchmarking might be a valuable instrument for self-study and improvement, I am not sure that most faculty are really ready to move very far away from the task of researching whether their students meet the learning goals they have set for their own courses, programs, schools, and institutions. External constituents of higher education, however, think this request for comparison is a very fair question and that an institution or program genuinely committed to the quality of student learning would be eager to pose and answer it. They are right. However, I am concerned that forced public benchmarking—the comparative performance numbers too easily translated into rankings or grades—will backfire in all sorts of unfortunate ways that will benefit neither universities nor the advocates of accountability.

Nonetheless, it appears that public policy makers expect colleges and universities to do more than focus on effective student learning. They want that learning to be achieved by larger numbers of students (traditional and nontraditional alike), and they expect it to make for effective participants in the global marketplace of skills and ideas. Therefore, they want to know about performance, and this is where we find the greatest push for some sort of nationally-normed set of learning performance indicators, with the indicators tied heavily to the kinds of skills and competencies called for by those who buy the talents of our graduates, namely employers. At a somewhat lesser level of expectation, this is also a demand for the academy to connect better the learning achieved by students and the skills and knowledge they need to be successful employees and citizens.

For those who see the academy as a protected space for creation and dissemination of knowledge, this emphasis on preparation for the workforce, even a workforce marked more by intellectual power than muscle power, is problematic. I can still recall the essay not so long ago

in the Chronicle of Higher Education written by Stanley Fish who was then either at the University of Illinois at Chicago or had just recently departed from it who argued strongly that college is not about teaching citizenship skills, but should be shaped primarily by the intellectual content and rigor of the discipline. For disciplines that infrequently check with the field to explore the fit between the educational pathways they require and the utility of the learning to the workplace, this calls for a kind of partnership foreign to the traditional academic culture. For those who believe that the university is best served by a series of insulating moats around the work of the academy, this kind of demand for greater integration and coordination is threatening at the very least.

Strangely enough, the kinds of universities you represent are at the same time models for 21st century higher education and the most visible evidence of resistance to new models. While many observers of higher education might point to the community college or The University of Phoenix as exemplars of the future for American higher education, our major research universities have pioneered, often through their research. their extension and continuing education, and soft money wings, the kinds of connections with broad constituencies of higher education that public policy makers expect. But when it comes to the kind of undergraduate education defined in this rash of reports on accountability, research universities have proven often to be amazingly resilient to change. For example, with some important exceptions, they have been the most resistant to the efforts of accrediting agencies to focus on student learning at the undergraduate level. And they have been the most defensive in their responses to the calls for greater public accountability for student learning performance. If I have heard it once, I have heard it a thousand times that research university faculties are rewarded for research, not for undergraduate teaching and the learning achieved by undergraduate students.

Clearly, the Spellings Commission was not particularly concerned how faculties and universities think. So as long as accrediting agencies continue to emphasize the central role of faculty in creating successful programs through which to assess student learning, the Spellings Commission is fairly certain that unless we “transform” our work, we will not be helpful in pushing institutions to meet fundamental national goals. It should not be surprising that the Department of Education under Secretary Spellings, despite her frequent claims that she really

wants creative partnerships in bringing about desired change rather than to enforce it, is evidently ready to force significant change in colleges and universities by transforming accreditation through new federal regulations.

If colleges and universities cannot agree on best practices for transparency and comparability, then the Department will try to make sure that recognized accrediting agencies resolve that problem. The newest proposed changes to the federal recognition program for accreditors make that goal unmistakable. This is what negotiated rulemaking is all about, and it has recently come under very heavy attack from the Washington, D.C. higher education community. The fundamental question posed to accrediting agencies both in existing recognition procedures and very explicitly in the proposed new regulations is this: “When do you know that institutional performance is good enough?” The Department of Education, once proposing that accrediting agencies must set and enforce performance standards as part of the accreditation process is now prepared to accept the proposition that agencies would require institutions to set their performance standards, to measure themselves against those performance goals and publish the findings, and then to have the agency determine whether the goals and the measurements are acceptable. For all vocational programs and those leading to licensure or certification (please note, this appears to include even programs at the doctoral level), the measures must at least include program completion rates, job placement rates, and licensing or certification rates. If we continue on this path, both accrediting agencies and colleges and universities have a challenging time ahead of us. Perhaps we are dodging the bullet of federally set performance goals, but we are going to feel the sting of this shot.

I am torn. It is difficult to dodge the question “When is good enough good enough?” And the key subsidiary question: “When is good enough actually furthering the capacity of the institution to help meet national goals?” Without some pretty clear guidelines, it is not very defensible to answer, “When peers make the judgment.” It is a fair question for our colleges and universities, too. In this regard, very important questions about accountability are appropriate questions to be asked and answered, both by institutions and the agencies that accredit them.

I understand the Secretary of Education's frustration with finding little leadership within the higher education community in response to these questions. But she's part of the problem, for while she's asking very important questions I think she has decided in advance that no good answers will come from the higher education community. And the overblown rhetoric of the pushback only confirms that view. However, she certainly is wrong in deciding that she will effectively overcome higher education inertia through the stick of accreditation. Nonetheless, many in Congress seem to share her solution as well. From my vantage point, if this very unique approach by Spellings fails, Congress is ready to write into the new Higher Education Act, should it ever get around to writing it, much of what she would like to see happen, and they, too, will turn to accreditation to get it done.

The decentralization and diversity of our higher education system has served us quite well in the 20th century. It is less clear that it is going to serve us equally well in the current century. I hope that five years from now I can look back and see evidence that assessment of student learning is firmly rooted in the culture of our universities and that the leadership of higher education together with makers of public policy crafted a strategy for documenting performance that helped restore public confidence in our enterprise and public funding for it. I wish I were the person to provide the vision of how that might be done, for I am convinced that it can be. But we do need vision, for we in the higher education community are not being given much time to create our response, nor will we be given much time to implement that vision. The future is upon us.