1 *Accreditation has a rich history that has shaped its purposes and processes.*

Accreditation in the United States: How Did We Get to Where We Are?

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Each year on hundreds of campuses around the United States, thousands of faculty, administrators, and staff are preparing for an accreditation review. It is a process now accepted as part of the higher education landscape, and the basics are well known: a set of standards, a self-study, a review by peers, and a decision from a commission. But the development and context of accreditation are less well understood: How did we get to where we are? Where did this system come from? And how is it uniquely American?

This chapter discusses the conditions, trends, and events that help explain the current status of accreditation in the United States, focusing largely, but not exclusively, on regional accreditation (accreditation in the United States also includes national accreditors for faith-based and career-oriented schools and specialized and professional accreditors). What follows is not a history of accreditation (Bloland, 2001; Ewell, 2008), though an overview chronology of accreditation in context is provided in Table 1.1. Presented here are twelve points designed to show how accreditation developed in the United States—how we got to where we are.

American Accreditation in Context

1. American accreditation is unique in the world.

With the international expansion of higher education, countries around the world are developing quality assurance systems to oversee both public and private degree-granting and other postsecondary institutions. The International Network for Quality Assurance Agencies in Higher Education began

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Table 1.1. A Chronology of Higher Education and Accreditation in the United States

Date	*American and Higher Education History*	*Accreditation*
1636	Harvard College established by vote of the Great and General Court of Massachusetts Bay Colony	
1791	U.S. Bill of Rights reserves powers not mentioned in the Constitution "to the states respectively or to the people."	
1819	*Dartmouth College* case decided by the U.S. Supreme Court, preserving the right to operate chartered private colleges without state takeover	
1839	First state normal school started in Lexington, Massachusetts	
1847	American Medical Association founded	
1862	Morrill Act creates land grant colleges	
1870	U.S. Bureau of Education publishes an official list of colleges	
1876	Johns Hopkins University founded	
1885		New England Association of Schools and Colleges (NEASC) founded
1887		Middle States Association of Colleges and Schools founded
1895		North Central Association of Schools and Colleges and Southern Association of Colleges and Schools (SACS) founded
1900	College Entrance Examination Board founded	
1901	Joliet Junior College, first two-year institution, founded by president of University of Chicago	
1905	Carnegie Foundation for Higher Education publishes list of recognized colleges	
1906	Carnegie Unit developed	
1910	Flexner report on medical education, raising standards and leading to closure of nearly half of the medical colleges	
1913		North Central Association establishes criteria for collegiate eligibility
1917		Northwest Association of Colleges and Universities founded
1922	American Council on Education holds "standardizing" conference	
1924		Western Association of Schools and Colleges (WASC) founded
1925	American Library Association publishes list of accredited schools	
1926		National Home Study Council, predecessor to Distance Education and Training Council, formed
1934		North Central Association adopts mission-oriented approach to accreditation
1940	American Association of University Professors statement on academic freedom	

1944	GI bill provides direct funding to college students	
1947	Truman Commission promotes network of community colleges, primarily for returning GIs	
1949		National Commission on Accrediting (NCA) founded by higher education associations to reduce duplication and burden in accreditation
1950s		Accreditation develops mission-centered standards, self-study, team visit, commission decision, and periodic review
1951		NEASC gets permanent office and staff
1952	Veterans Readjustment Act ties financial aid to institutional accreditation	
1953		Black colleges accepted as full members of SACS
1964		Federation of Regional Accrediting Commissions of Higher Education (FRACHE) established
1965	Higher Education Act (HEA) first passed, greatly expanding financial aid to students	
1968	Formal process for federal recognition of accreditors established	
1972	HEA reauthorization opens door to for-profit school participation in financial aid	
1975		NCA and FRACHE merge to form Council on Postsecondary Accreditation (COPA)
1980	U.S. Department of Education started	
1984	*Involvement in Learning* (National Institute of Education) calls for judging institutions by effectiveness in educating students	
		SACS adopts Institutional Effectiveness standard
1992	HEA reauthorization nearly breaks the link between financial aid and accreditors; creates National Advisory Committee for Institutional Quality and Integrity; authorizes state postsecondary review entities (SPREs) to review institutions with high default rates	
1993		COPA dissolved by its board; Council on Recognition of Higher Education formed to take over recognition function
1994	SPREs defunded by Republican Congress	
		Council on Higher Education Accreditation founded
1998	No mention of SPREs in HEA reauthorization	
2006	Secretary of Education Margaret Spellings's Commission on the Future of Higher Education publishes its report	
2008	HEA reauthorized. Accountability for accreditation retained; secretary of education cannot regulate how accreditors judge student learning; advisory committee appointments to come from Secretary plus House and Senate	

in 1991 with conference attendance from approximately ten countries; it now includes as full members 148 quality assurance agencies from seventy-five countries around the world. The list is a partial accounting of a rapidly growing phenomenon. But no other country has a system like ours; among quality assurance systems, the American system stands out in three dimensions:

1. Accreditation is a nongovernmental, self-regulatory, peer review system.
2. Nearly all of the work is done by volunteers.
3. Accreditation relies on the candor of institutions to assess themselves against a set of standards, viewed in the light of their mission, and identify their strengths and concerns, using the process itself for improvement.

2. The structures and decisions of U.S. government provided the conditions in which accreditation developed.

The U.S. Constitution, the Supreme Court, and the Congress each had a role in establishing an environment in which accreditation could develop. First, whereas accreditation in other countries is generally a function of the ministry of higher education, the U.S. Constitution provides that matters not mentioned in it are left to the states and to the people. So while the federal government has become more prominent in matters of education, the early development of the education system in this country was left free of government control, allowing the establishment of a diverse array of colleges and universities. The lack of government regulation also meant there was no clear and uniform floor on the minimum expectations for a college or a college education, leaving a vacuum that accreditation grew to fill. Thus, the social interest in having a sense of minimum standards was in part responsible for the development of accreditation.

A second defining act in setting the conditions for American higher education was the *Dartmouth College* case (*Dartmouth* v. *William H. Woodward*) in 1819, in which the U.S. Supreme Court effectively prevented the state of New Hampshire from taking over the independent institution and established the rights of private organizations. Daniel Webster, arguing before the Supreme Court, said that Dartmouth was a "small college and yet there are those who love it," illustrating the devotion to the developing institution that has been a bedrock of American higher education.

Third, that same era saw another important decision, this time by Congress as it declined to advance the legislation needed to begin a national university, despite the wishes of several of the founding fathers, including the first six American presidents (Snyder, 1993). Thus, the freedom of states, churches, and individuals to form institutions of higher education was ensured, and the basis for the considerable autonomy that American colleges and universities still enjoy was firmly established.

The U.S. Constitution also provides for the separation of church and state. By the time the federal government began significant aid to higher

education after World War II, the country was replete with public and private institutions, both secular and nonsecular. The system that provides aid to the student and not directly to the institution accommodates both the Constitution and the desire to provide a broad range of student choice. By this time, accreditation was well enough developed that the federal government came to rely on it to identify those institutions worthy of federal financial aid for students.

3. Accreditation reflects American cultural values.

Alexis de Tocqueville's 1835 *Democracy in America* is remembered in part for his observation that Americans form associations to deal with matters large and small. Accrediting organizations are one such example. The New England Association of Schools and Colleges was founded in 1885 by a group of secondary school headmasters acting in concert with a group of college presidents led by Charles Eliot of Harvard, gathering to consider their mutual interests in ensuring that preparatory and secondary school graduates were ready for college. Accrediting associations were established as membership organizations, supported by dues and fees (and occasional private grants), providing the foundation for self-regulation and the independence that has helped accreditation preserve the autonomy of institutions.

Americans value problem solving and entrepreneurship. As America expanded westward, settlers started businesses, churches, and colleges. By the 1860s, over five hundred colleges had been established, though fewer than half of them were still operating (Cohen, 1998). Tracing the early history of American higher education institutions is made more difficult because the term *college* might be applied to any number of types of institution, including technical institutes and seminaries. Indeed, one of the early tasks of the New England Association of Schools and Colleges was sorting out which institutions were in fact colleges, an undertaking made more difficult by the number of "academies" that sometimes spanned the boundaries between secondary and collegiate education.

Americans also believe in the ability of the individual to achieve a self-identified goal. Leaving aside the imperfections with which the belief is translated into reality, this optimism has proven foundational for the increasing access to education throughout this country's history, especially following World War II. The history of regional accreditation of various types of institutions of higher education reflects this increasing diversity of institutions of higher education and increasing access. For example, in New England, the roster reflects the first institutional accreditation in 1929[1] to twenty-one independent institutions, plus public universities in Maine and Vermont. Later dates reflect expanding access: the first state college in 1947, the first community college in 1964, the first for-profit institution in 1964, the first overseas institution in 1981, the Naval War College in 1989, and the first institution owned by a large for-profit education corporation in 2004. Examples from other regions differ in timing and type but illustrate a similarly

expanding base of institutions reflecting increased access to higher education. For example, the Western Governors University was developed in an area of increasing population and large distances at a time when it was possible to envision an institutional model other than bricks-and-mortar to expand access to higher education.

Accreditation relies fundamentally on volunteers to carry out the work. Volunteering is, of course, a great American tradition: Americans volunteer in schools, hospitals, fire departments, and settlement houses. Lawyers work pro bono, and corporations volunteer executives to work with schools. In accreditation, volunteers are at the core of the work: teams are composed of volunteers, and it is volunteer peer reviewers who serve on the policy- and decision-making bodies.

Americans also believe in self-improvement, an activity requiring self-evaluation and identification of areas that could benefit from enhancement. In accreditation, this value manifests itself in the expectation that the institution will demonstrate candor in reviewing itself against the standards. In regional accreditation, the self-study process is not so much a proof exercise, demonstrating that the standards are met (though they do need to be met at some level) as an analytical exercise showing that the institution has the capacity and inclination for honest self-assessment, the basis of self-regulation and continuous improvement.

The Development of American Accreditation

4. Accreditation developed as higher education became increasingly important.

The history of American higher education is largely one of increased access, mission differentiation, and experimentation. Accreditation is not responsible for any of these features, but it has supported an environment in which all three could flourish while providing a basic framework that prevents chaos and promotes coherence in the system.

Harvard College was founded in 1636, and by the beginning of the American Revolution, there were nine chartered colleges: Harvard University; College of William and Mary; Yale University; University of Pennsylvania; Princeton University; Columbia University; Brown University; Rutgers, The State University of New Jersey; and Dartmouth College. The lack of government regulation in the early years and the individual, even entrepreneurial, nature of founding a college quickly led to more diversity among institutions in the United States by the mid-1800s than many other countries enjoy today. Table 1.2 summarizes the growth in American higher education.

Yet the curriculum remained narrow, and the proportion of the age cohort enrolled was small. In the late 1880s, 62 percent of college students were enrolled in classical courses, and only about 1 percent of eighteen- to twenty-four-year-olds were enrolled in college (Snyder, 1993).

Table 1.2. Growth in U.S. Population and Higher Education

Dimension/Year	*1790*	*1870*	*1890*	*1930*	*1945*	*1975*	*1995*	*2005*
U.S. population (millions)	3.9	29.8	62.6	123.1	139.9	215.4	262.8	295.5
Students enrolled (millions)	0.001	0.06	0.16	1.1	1.7	11.2	14.3	17.5
Number of institutions	11	563	998	1,409	1,768	2,747	3,706	4,216

Sources: Cohen (1998) and Snyder (1993).

In the 1890s, when the first accrediting associations were organizing, there were already more than nine hundred institutions of higher education, though the percentage of eighteen- to twenty-four-year-olds enrolled was about 2 percent. Institutions were small, averaging 160 students in 1890. But the economy was strong, the second industrial revolution was in full flower, America was in its (first) gilded age, and the link between economic development and higher education had been firmly established. The rapid rise in the number of institutions, and the types of institutions, increased the interest in a means of identifying institutions of trustworthy educational quality. Access was furthered by the establishment of land grant institutions, conservatories, black colleges, women's colleges, additional church-related schools, Bible colleges, art schools, military academies, research universities, and work colleges.

The rates of college attendance increased, though rather slowly at first. By 1945, 10 percent of the eighteen- to twenty-four-year-olds were enrolled in college; by 1953, the figure was 15 percent. By that time, the diversity of institutions had increased to include normal schools, business colleges, and community colleges. After World War II, the government made considerable financial aid available to returning veterans and required a way to ensure that taxpayer support was finding its way, through students, to legitimate institutions of higher education. Rather than develop its own system, government turned to accreditation, providing a major impetus for accreditation to develop its own enterprise.

By 1965, when the first Higher Education Act was passed, dramatically increasing the availability of federal financial aid, 30 percent of the age cohort was enrolled. The large number of baby boomers entering college at a time of social change provided the conditions for experimentation to flourish, for example, at Bennington College, Antioch University, New College of Florida, Oakes College at the University of California, Santa Cruz, the Experimental College at Tufts, and Hampshire College. The reach to accreditation to vouch for educational quality while providing peer oversight of responsible experimentation served both the public interest and the interest of higher education.

Thus, accrediting associations started at a time when there were enough institutions operating with essentially no government oversight that it was useful to begin keeping lists of what peers believed were legitimate institutions. (Developing later but somewhat in parallel are the national accreditors for career institutions, religious institutions, and distance education and a host of specialized and professional accreditors.) Accreditation became useful to the government when there was sufficient financial aid support to require a means of ensuring that the money followed students who were enrolled in educationally satisfactory institutions.

5. Accreditation has developed through evolution, not design.

Following the beginnings of the New England Association of Schools and Colleges, other regions started similar groups: Middle States Association of Colleges and Schools (1887), North Central Association of Schools and Colleges (1895), Southern Association of Colleges and Schools (1895), the Northwest Association of Colleges and Universities (1917), and the Western Association of Schools and Colleges (1924). In the regions, accrediting associations tended to be started by the relatively well-established, highly regarded institutions, so as the membership increased, it widened from a base of highly esteemed institutions.

Although the New England Association was the first to be founded and had adopted standards of membership at least by 1929, it did not use the term *accreditation* until 1952, when it also initiated a program of periodic review. In fact, the other regionals, though using the term *accreditation* earlier than the New England Association did, also functioned for many years without a systematic program of periodic review now considered an essential element of accreditation.

The early years of accrediting associations are said to be focused on identifying which institutions were legitimately colleges. By 1913, the North Central Association had developed explicit criteria for membership (Ewell, 2008). The early requirements were uniform within a region and reflective of the time of cloth ribbons and manual typewriters—rather terse by today's standards, even as the landscape of higher education was becoming increasingly diverse. By this time, the country had highly regarded and respectable institutions of several varieties: independent liberal arts colleges; public universities, including the land grant institutions; and private research universities.

The tension between clear, stringent standards and increasing institutional diversity continued until 1934 when the North Central Association developed the mission-oriented approach to accreditation, which endures today. But producing a report, much less validating it by a team of peers, posed challenges: distances were great, roads in rural areas were uncertain, the era of roadmaps had just begun, and long-distance phone calls were expensive.

Between 1950 and 1965, the regional accrediting organizations developed and adopted what are considered today's fundamentals in the accreditation process: a mission-based approach, standards, a self-study prepared

by the institution, a visit by a team of peers who produced a report, and a decision by a commission overseeing a process of periodic review. With the basics in place, the regionals have worked to refine and strengthen accreditation, learning from experience, and adapting to changing circumstances and expectations.

Since the mid-1960s, institutions have become more complex from an accreditation point of view. Driven partly by the requirements of federal recognition and partly from the realities of overseeing quality as institutions changed individually and collectively, accreditation has developed processes to train and evaluate team members and team chairs, oversee branch campuses and instructional locations, evaluate distance education, find accommodation for contractual relationships, deal with the related entities that accompany for-profit and some religiously based institutions, assume responsibilities for teach-out agreements when institutions close, and oversee the quality of campuses that enroll students abroad.

Also since the 1960s, the widespread use of information technology has enabled the development of a more sophisticated approach to data analysis, report preparation, and electronic communication. Photocopying and word processing provided new capacity for producing thoughtful reports. More recently, electronic spreadsheets, relational databases, e-mail, and the Web have provided a further foundation for the development of increased institutional capacity reflected in the accreditation process. The rise of institutional research as a field of practice has in many cases provided the human capacity to take positive advantage of the technology to analyze institutional effectiveness. Today accreditation can ask better questions and expect better analyses because institutions have the capacity to respond better than in the past.

More recently of interest is what may be considered a new generation of assessment instruments, including the now well-established National Survey of Student Engagement and its more recent cousin, the Community College Survey of Student Engagement, providing baccalaureate and associate degree–granting institutions with usefully comparable information on the educational experiences of their students. A more recent entry is the Collegiate Learning Assessment, which seeks to provide institutions with useful feedback on how much their students have gained in reasoning and communication skills and promising a measure of the value added by their institution in comparison with similar colleges and universities. More locally, electronic portfolios and consortia of institutions producing comparable data on student assessment enhance the ability of institutions to explore meaningful ways of considering what and how their students are learning, based on institutional mission.

6. Standards have moved from quantitative to qualitative, from prescriptive to mission centered, and from minimal to aspirational.

The general trend in accreditation has been a movement from focusing on inputs or resources to processes to outcomes or effectiveness. Thus, there

was a time when regionally accredited institutions were required to have a library of a certain size (at one point in New England, that size was eight thousand volumes, apparently regardless of the size of the student body or the nature of the programs). As accreditation developed, it became possible to focus more directly on ensuring student access and, later, student use of the resources and, later still, information literacy skills. Similarly, a focus on the credentials of the faculty was augmented by a concern for the quality of instruction. Leading and following higher education's shift in focus from teaching to learning, the emphasis of accreditation now is considerably on the assessment of student learning. This is not to say that the focus on inputs and processes should disappear. A well-qualified faculty is essential to quality in higher education. Rather, the focus on outcomes has developed to augment and shift emphasis in judging the quality of an institution.

When colleges and universities were being established at a fast clip, having minimal standards was useful in communicating, and ensuring, the basics needed for admission to the academy as a respectable institution of higher education. While there are still new institutions forming—in New England, the newest, Vermont College of Fine Arts, was chartered as this chapter was being written—the rate of establishing new institutions has surely declined as land has been settled and institutions of higher education have mastered the art of establishing branch campuses and new instructional locations and offering programs through distance learning. Increased requirements in most states for licensure and the need for accreditation's approval to have access to federal financial aid have raised the bar for establishing new institutions. Indeed it has become a challenge to ensure that the bar is not raised so high as to dampen the creative energy manifested in new institutions.

For established, stable, accredited institutions, minimum standards are of minimal interest. For accreditation to remain useful to these institutions, the process must have value. Accreditors have increasingly recognized that the process must promote improvement across the entire range of institutions. With standards at a sufficiently aspirational level, every institution finds dimensions on which it wishes to improve, promoting productive engagement in the accreditation process.

7. Accreditation is a social invention evolving to reflect contemporary circumstances.

An application for membership in the New England Association of Schools and Colleges in 1932 reveals separate considerations for "senior colleges" and "junior colleges," and consideration of admissions requirements, graduation requirements, "recognition" from other colleges and universities, number of faculty (including the number with master's and doctoral qualifications and student-to-faculty ratio); hours of teaching per semester (minimum, average, maximum); departments in which instruction is offered; a statement of physical facilities "and a particular statement

as to the library"; income from various sources and size of endowment; and total expenditures. The applicant institution is instructed that the "committee would also be glad to have information as to the makeup of the student body, and as to the purposes and plans of the institution for the future."

The separate handling of two- and four-year institutions is a matter addressed at some point by nearly all of the regional commissions: separate standards or different commissions were used to expand the operation to include two-year institutions in a manner that seemed reasonable at the time. Now, however, except for WASC, where two separate but cooperating commissions remain, the regionals have developed the means to accredit two- and four-year institutions, as well as free-standing graduate schools, with a single set of standards under a single system.

As accreditation developed, it embraced many of the essential elements of American higher education, including the role of the governing boards, the place of general education in the curriculum, the centrality of academic freedom for faculty and students, and opportunity for student development outside as well as inside the classroom. None of these items is required for federal recognition. (For the elements currently required, see subpart 602.16 at http://www.ed.gov/admins/finaid/accred/accreditation_pg14.html#RecognitionCriteria.) This disjuncture between what the federal government regulates, including "success with respect to student achievement," and the softer side of American higher education may help explain the angst that was generated by the work of the Spellings Commission.

That said, because a college education today is both more necessary and more expensive than ever before, accreditation faces new challenges to which it must respond. While assessment, understanding student success, and increasing transparency are the most significant issues, they are not the only ones. Accreditation has always changed as higher education has changed, and responding to increased calls for accountability is not the only current challenge for accreditors. Others include overseeing international branch campuses and instructional locations of U.S. institutions; determining what role, if any, accreditation has in student debt; and sorting through how accreditation deals with institutionally significant related entities, including large corporations owning accredited institutions.

Unique Aspects of American Accreditation

8. As a quality assurance system, accreditation is unusually focused on the future.

From an international perspective, accreditation is not the only quality assurance system in higher education; others include academic audit and inspection, both of which focus more heavily on an examination of current or past activities to identify areas for improvement.

Accreditation as practiced in the United States focuses heavily on the future, on quality improvement, unlike systems built solely or predominantly

to ensure the quality of the current operation and identify fixes that need to be made. Ideas for improvement can surely come from an examination of current practice, but they can also come from thoughtful consideration of societal trends, demographic projections, increased technological capacity, and a host of other sources. Accreditation is constructed to focus on the future, using all of these perspectives.

The various regional accreditors have different ways of emphasizing this forward nature in their self-study process. For example, SACS relies on a quality enhancement plan (QEP) to focus on improvement in an area of identified institutional importance; the New England Association includes a "projection" section for each standard in which the institution is asked to use the results of its self-assessment as a basis for planning and commitments in the area under consideration.

Awarding accreditation or continuing an institution in accreditation is a prospective statement by peers that the institution has demonstrated its ability to identify and address significant issues: that it is operating at a satisfactory (or better) level of quality and gives reasonable assurance that it will continue to do so for up to ten years, with specified monitoring, including a fifth-year report. Additional monitoring has become more frequent: for example, in 2007, the Middle States Association and NEASC specified follow-up reporting in between half and two-thirds of institutions undergoing comprehensive reviews, most often over matters of student learning, planning and evaluation, and institutional finance. Nevertheless, when compared with government systems in many other countries, it remains a light touch. The candor to identify areas needing improvement and the capacity to describe and pursue reasonable methods for improvement are keys to the confidence expressed in a decision to accredit or continue accreditation.

This forward focus of regional accreditation invites institutions to use the process itself for improvement. Standards that are aspirational allow every institution to harness the process to address identified concerns and enhance institutional strengths.

9. Accreditation has benefits not often recognized.

Some of accreditation's benefits are generally acknowledged: access for students to federal financial aid, legitimacy with the public, a ticket to listings in guides to college admissions, consideration for foundation grants and employer tuition credits, reflection and feedback from a group of peers, and keeping the government at arm's length through a self-regulatory process. Arguably these are the greatest benefits, but there are significant additional benefits as well.

First, accreditation is cost-effective. In 2005, regional commissions accredited three thousand institutions using thirty-five hundred volunteers in a system overseen by 129 full-time staff. Quality assurance systems in most other countries are more regulatory than in the United States and therefore more expensive. It is not unusual for a government-based quality

assurance system to have, on average, one employee for every two or three institutions overseen. The Quality Assurance Authority in the United Kingdom, for example, has 130 employees to oversee the quality of 165 institutions. In the United States, accreditation has relied on volunteers from its beginning; NEASC did not have a permanent staff or offices until 1951.

Second, participation in accreditation is good professional development. Those who lead a self-study frequently come to know their institution more broadly and deeply; at a time of strong centrifugal forces in higher education, the self-study can draw faculty closer to their institution. Those who serve on or lead visiting teams often proclaim it is the best professional development they get. And the roster of presidents and provosts who serve the enterprise give testimony to its value. Outside of accreditation, few academics get the opportunity to see another institution, more or less like their own, at close enough range to gain a new perspective on their own work. To engage the theater of accreditation is to see the lessons of transformative leadership, capacity, mission, and governance played out on a stage of drama, with episodes of tragedy and comedy.

Third, self-regulation, when it works, is a far better system than government regulation. A regulatory approach can require institutions to report graduation and placement rates, but it is unlikely to engage the institution in formulating its own questions about what and how students are learning. Regulation seeks uniformity, whereas self-regulation is open to differences. Self-regulation does not always work, of course. Accreditation is challenged particularly in a time of low public trust to ensure that it retains the confidence of the public to oversee educational quality in a nongovernmental peer review system.

Fourth, regional accreditation gathers a highly diverse set of institutions under a single tent, providing conditions that support student mobility for purposes of transfer and seeking a higher degree. To be sure, there are some in the for-profit and national accreditation community who believe the doors of the tent are too often closed to their students wishing to bring credits or degrees to regionally accredited institutions. However, regional accreditation has gathered a vast array of institutions under a single system without drawing boundaries that inhibit transfer and leaving the decisions about the acceptance of credits and degrees properly in the hands of individual institutions.

10. Although regional accreditation may not be entirely logical, there are benefits.

Some of the regions make geographical sense: there is only one correct listing of the states that comprise New England. That said, given the North-South split of the country, the SACS territory generally makes sense, and therefore the Middle States Association as a region is understandable. The midwestern and western states that were not fully settled into statehood as accrediting agencies elsewhere were developed are somewhat less logically

configured for purposes of regional accreditation. But then state boundaries lack an apparent rationale.

There are regional differences that impinge on higher education. In New England, we operate in a relatively small space densely populated with colleges and universities, so it is not surprising that there are no predominantly online institutions in our region. We will also face a demographic downturn among traditional-age students in the next several years that will place very different pressures on higher education from those experienced in parts of the country with expanding college-age demographics.

Accreditation is a self-regulatory system, relying on member institutions to form, adopt, and adhere to standards and policies. Regional commissions help keep the membership involved in accreditation by having more local opportunities for participation. Regions increase the ownership of the member institutions in the standards, provide communities of discussion that support knowing the standards well enough to internalize their meaning. And at some level, institutions must have internalized the standards sufficiently, through policy and practice, to be able to regulate their behavior consistent with the standards.

Regional accreditors vary somewhat in the terminology and processes, but overall, the enterprise is remarkably unified. Differences among the regionals reflect to some extent differences among the regions. New England has a strong tradition of independent higher education, and nearly half of its undergraduates attend independent institutions, in considerable contrast to other parts of the country. Many independent institutions in a region of small states raises the rheostat on issues of importance to nonpublic institutions. Conversely, the Northwest Commission operates in a region of large distances, highly dominated by public institutions.

Regional accreditation provides a natural laboratory for experimentation. As accreditation mastered the task of admitting institutions to membership while accommodating an increasing array of institutional types, it also began to wrestle with the task of making the accreditation exercise valuable for institutions for which meeting the basic requirements is not (likely) at issue and the related task of ensuring that accreditation fulfills its role of quality improvement for the full array of institutions. The regionals have approached this task somewhat differently. In the New England and Middle States regions, institutions are invited to propose self-studies with a special emphasis designed to align the energy of the accreditation process with key educational concerns or initiatives of the institution; visiting teams, while also ensuring that the institution fulfills the standards, pay special attention to the identified focus. WASC designed its two-stage process of capacity and effectiveness reviews largely in response to the needs of the large institutions that dominate the region (68 percent of students in the WASC region attend institutions of ten thousand or more students; in New England, that figure is 29 percent). SACS sequestered its compliance criteria to the first stage of its process and emphasizes the quality enhancement

proposal element, and the Higher Learning Commission (North Central) developed the Academic Quality Improvement Program (AQIP) to provide an alternative process for institutions that prefer a continuous improvement model over periodic review.

The mobility of higher education presidents, provosts, and other academics encourages good ideas developed in one part of the country to find an audience for consideration in another part. Accrediting teams in many regions frequently include members from other parts of the country. Furthermore, strong presidential and academic associations, most notably the six major institutional organizations and (the late) American Association for Higher Education and now the American Association of Colleges and Universities, provide nationally structured platforms for academics to speak to their regionally structured accreditors. (These six are the American Council on Education, American Association of State Colleges and Universities, American Association of Community Colleges, Association of American Universities, National Association of Independent Colleges and Universities, and National Association of State Universities and Land-Grant Colleges.) Finally, the regional accreditors have strengthened their own cooperative muscles of late, united by proposals from Washington and, more positively, on joint efforts around distance learning and assessment.

Accreditation's External Relationships

11. Accreditation is in an evolving relationship with the federal government

With nearly $90 billion invested annually in federal financial aid, the government, representing taxpayers, deserves a robust system to ensure that the schools the recipient students attend are of sufficient educational quality. And in fact it was the increasing amount of federal financial aid that both increased access to higher education and led to the recognition of accreditors as the gatekeepers to federal funds.

The federal program to recognize accrediting organizations as "reliable authorities concerning the quality of education or training offered by the institutions of higher education . . . they accredit" began quietly. From what has been called the second GI bill, providing support for returning veterans from the Korean War, the federal government began to rely on accreditation organizations to identify institutions educationally worthy of taxpayer investment in the form of federal financial aid to students. Thus, when the Higher Education Act was first passed in 1965, greatly expanding federal financial aid to students, the government turned to accreditation to identify institutions eligible for student payment of this aid. The process was developed by 1968 and conducted initially by federal staff.

Viewed through the lens of federal financial aid, institutions were overseen by "the triad": states for purposes of licensure and basic consumer protection, the federal government for purposes of effective oversight of

financial aid funds, and recognized accreditors to ensure sufficient educational quality.

At the beginning, the process appeared to pose no challenges to the authority of accreditation and therefore the autonomy of institutions. As late as 1986, the director of a regional accrediting commission described the relationship with the government as "benignly quiescent" (Cook, p. 166). But things had begun to change on two fronts: expectations for what has come to be called assessment of student learning and problems with the use of federal financial aid.

In 1984, a federal panel established by the National Institute of Education published *Involvement in Learning*. Arguing for access and degree completion, the panel also identified the need to focus more clearly on student learning outcomes. That same year, SACS developed a standard on institutional effectiveness, a move adopted soon after by the other regionals. These efforts built on an emerging body of research on student learning in higher education and helped spur the assessment movement (see, for example, Ewell, n.d.).

Meanwhile, the availability of large amounts of federal financial aid had attracted a few bad actors into the business of postsecondary and higher education. There were instances, most but not all outside the realm of regional accreditation, of institutions with high student loan default rates, where allegations of fraud and abuse seem not to have been misplaced.

The relationship between accreditors and the federal government changed abruptly during the 1992 reauthorization of the Higher Education Act. Most dramatic, Congress, distressed with high student loan default rates and frustrated that accreditors were not taking action, at one point considered breaking the link between accreditation and federal financial aid to students. Instead the reauthorized act included the establishment of state postsecondary review entities (SPREs), which would have had states conduct reviews based on stringent quantitative criteria in instances triggered by high institutional loan default rates. The SPREs also gave states the authority to conduct investigations where they had reason to believe there were problems. The threat was never realized: the 1994 Republican Congress declined to fund the SPREs, and they were written out of the law during the 1998 reauthorization.

The discussion of the SPREs highlighted the very differing capacities of states to oversee basic quality in higher education and their enthusiasm for undertaking the role with respect to independent higher education. Some states have robust processes to oversee the quality of independent as well as public higher education, some have satisfactory licensing processes to establish an effective floor, and some now outsource quality assurance by requiring accreditation by a regional accreditor or other federally recognized body. But a few states—fortunately a decreasing number—have declined to set a reasonable minimum bar for operation, attracting institutions of minimal quality or, in some cases, degree mills.

The 1992 reauthorization also upped the ante on student learning assessment. The bill specified areas that accreditors needed to include in their standards and reviews, including curriculum, faculty, and student achievement. The new bill established the National Advisory Committee for Institutional Quality and Integrity (NACIQI) as the group making recommendations to the secretary of education regarding the recognition of accrediting agencies; staff now provide the background information and make a recommendation to NACIQI. That members of NACIQI are appointed by the secretary of education raises concerns about the extent to which political agendas have been pursued, however.

As the government engaged accreditors on the matter of assessment, the engagement was generally in line with accreditation's approach to assessment, that is, as a means of providing evidence useful for institutional improvement. But the game seemed to change when the Commission on the Future of Higher Education, established by Secretary of Education Margaret Spellings (and referred to as the Spellings Commission), issued its report in 2006; the administration and its supporters were highly critical of accreditation for not providing "solid evidence, comparable across institutions, of how much students learn in colleges or whether they learn more at one college than another" (p. 13).

The atmosphere for increased federal concern, if not scrutiny of academic quality in higher education, is influenced by two recent trends:

- Higher education is more important than ever before. For individuals, the route to the middle class relies increasingly on higher education. Over a lifetime, a worker with a bachelor's degree has estimated earnings nearly twice that of a high school graduate.
- Higher education is more expensive than ever before in terms of both direct cost during the college years and the accumulation of debt upon leaving higher education. By 2006, approximately two-thirds of students with a bachelor's degree graduated with debt that averaged nearly twenty thousand dollars (Project on Student Debt, 2007).

As the Higher Education Act becomes more complex (the 2008 version runs over eleven hundred pages) and the experience of recognition surfaces new issues that the Department of Education seeks to address, the regulation surrounding the recognition of accreditors has intensified. This recognition system has become increasing complex—and some would say intrusive into the business of accreditation. How the regulation is carried out also matters; the approach taken by Secretary Spellings, bolstered by the report of her Commission on the Future of Higher Education, was activist, changing the atmosphere and raising the stakes (Lederman, 2007).

Peter Ewell (2008) has identified a major cause of the tension between federal regulators and accreditors as the "the principal-agent problem." In this case, the principal is the federal government, and the agent is the

accreditor, authorized to carry out a quality assurance function on behalf of the principal. Because the agent, the accreditor, is close to the institutions whose quality it oversees, it is "captured" and imperfectly fulfills the expectations of the principal. But accreditors do not think of their primary role as federal agents. Thus, the agendas of the principal and the actors are not entirely congruent, resulting in a heightened desire for control—regulation—on the part of the government-as-agent and a reluctance on the part of accreditors to assume additional regulatory functions in their relationships with colleges and universities.

The 2008 version of the Higher Education Act does not permit the secretary of education to regulate the portions of the law on how accreditors should specify and examine institutions with respect to student achievement. And NACIQI will be restructured so that members are appointed equally by the secretary of education, the House, and the Senate, the latter two with bipartisan members. Given the importance and expense of a college education, however, the importance of understanding the educational effectiveness of institutions will not abate. And the Higher Education Act is reauthorized every five years, so there is every reason to believe this saga will continue.

12. Colleges and universities are the members of accrediting associations and also influence accreditation through their other membership organizations.

The national presidentially based professional associations have had a long history of working to coordinate, oversee, and reduce the "burden" of accreditation on member institutions. As accreditation developed, some of the larger, more complex institutions were being visited not only by their regional accreditor but also a growing number of specialized accreditors. In 1949 a group of higher education associations formed the National Commission on Accreditation, with the goal of reducing the duplication and burden to institutions resulting from multiple accreditors.

About the same time, the regional accreditors joined together to create the National Commission on Regional Accrediting Agencies, replaced in 1964 by the Federation of Regional Accrediting Commissions of Higher Education (FRACHE). In 1975, in an attempt to create a strong central authority for accreditation, FRACHE, which by then included some of the national accreditors of career schools, and the National Commission joined forces to create the Council on Postsecondary Accreditation (COPA).

One of COPA's most visible activities was the development of a process to recognize accreditors. The process had two main goals. The first was to ensure that accreditors comported themselves suitably in their relations with institutions. For example, provision was made to ensure that accreditors initiated an accreditation review only on the invitation of the institution's chief executive officer. Process requirements ensured that the institution had an opportunity to review a draft accreditation report and ensure it was factually correct. The second purpose was to guard against what the presidential

associations saw as the proliferation of accrediting associations, as new groups were being established and seeking their legitimate place at the table. This goal proved challenging, as there was external and considerable institutionally based support for a continuing parade of new specialized accreditors.

Upon legal advice, COPA determined that it must entertain the application of any accreditor that met its requirements for recognition regardless of whether there was an existing accreditor in that field. Somewhat to the dismay of the presidents, this meant that not only was there less likelihood of holding new accreditors at arm's length, but also that there could be multiple accreditors in a field. Today there are multiple accreditors in business, nursing, and education. Interestingly, while presidents and provosts have at times resisted the establishment of new specialized accreditors, as assessment and the understanding of student learning outcomes has become more important, it is often the professional programs, pushed by these same accreditors, that have experience valuable to their campus colleagues on how and how not to approach assessment.

COPA's governing board voted to dissolve the organization in 1993. The various components served by COPA—the presidents and the several types of accreditors—were not working well together, and all parties were dissatisfied with how COPA had represented accreditation during the reauthorization of the Higher Education Act. COPA's task in the reauthorization was particularly difficult at the time because some of the national institutional accreditors that it recognized oversaw for-profit institutions with high default rates and the major source of the "fraud and abuse" concerns. Thus, COPA was challenged to have a clear voice representing all of its constituents.

The demise of COPA threatened to leave a vacuum. The Commission on Recognition of Postsecondary Accreditation (CORPA) was created to continue the recognition function, essentially picking up that process where COPA left off. Establishment of a broader organization was first attempted by the National Policy Board, a group of regional accreditors and major higher education associations, but the group could not reach consensus. In 1995, the Presidents Work Group was established to propose a national organization concerned with accreditation. In an institutional referendum, 54 percent of institutions voted, and among those, 94 percent voted to create the Council for Higher Education Accreditation (CHEA) (Glidden, 1996).

Unlike its predecessor, CHEA is an organization of institutions accredited by a recognized accreditor for which 50 percent or more of its institutions are degree granting. (This definition excludes some of the national institutional accreditors, giving CHEA greater focus than COPA had but making it more difficult for CHEA to be the overall convener of accrediting organizations.) CHEA has taken over the role of nongovernmental recognition of accrediting organizations, a role valued for providing access to a legitimizing recognition function for higher education accreditors that are

not federally recognized. To be eligible for federal recognition, accreditors must be gatekeepers to federal funds, generally but not exclusively Title IV. Earlier, the recognition process was open to all accreditors, including accreditors of K-12 schools, and then all postsecondary accreditors. (ABET, the engineering accreditor, withdrew from federal recognition in 2001, believing its move to emphasize outcomes assessment was not compatible with federal requirements.) CHEA has also played an active role in the reauthorization of the Higher Education Act, has an active program of publication and organizes meetings that serve as the major national forum for academics, accreditors, government officials, the press, and international guests to discuss matters related to accreditation in the United States.

After the demise of COPA, the accreditors organized themselves into mission-alike groups. The regional accreditors regrouped into the Council for Regional Accrediting Commissions (C-RAC) providing a forum for cooperation, professional development, and external relations. C-RAC executives meet three or more times a year, once with commission chairs; and the professional staff hold a retreat every two to three years. C-RAC has developed policies and other statements on assessment, the mutual recognition of accreditation decisions, and the review of distance education. Periodically C-RAC meets with the Association of Professional and Specialized Accreditors to discuss topics of mutual interest.

The recognition criteria of CHEA and the U.S. Department of Education differ. Consider, for example, the contrast between the requirement by CHEA that accreditors notify the public of their decisions—that the accreditor has "policies and procedures to notify the public" of its decisions—with the regulation by the government, stated in 375 words, including the prompt notification of government authorities. Similarly, the requirements for accreditor oversight of branch campuses and instructional locations have increased dramatically, a topic about which CHEA recognition is silent.

With the secretary of education's role on regulating how accreditors approach student learning outcomes limited by the 2008 requirements, the door is open to CHEA, as a voluntary higher education body, to address the matter more in keeping with the traditions of self-regulation and good practice in accreditation.

Conclusion

Accreditation developed within the freedoms given higher education as the United States developed. Reflecting the American culture, accreditation has provided the context in which America's prized diversity of colleges and universities has developed. For half a century, accreditation, still changing, has provided a buffer between institutions of higher education and government, providing student access to federal financial aid while significantly preserving institution autonomy. Now, at a time of change in the economy,

technology, and the federal government, accreditation has the opportunity to assess its status and context and prepare for its future.

Note

1. When NEASC began its accreditation program in 1952, the institutions previously accepted into membership were grandfathered and cycled into a new program of periodic review.

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