

**Council for
Higher Education
Accreditation**

**THE CHEA INITIATIVE
Final Report**

November 2012

The Council for Higher Education Accreditation Mission Statement

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

– 1996

The *CHEA Initiative*

Final Report

What follows is a report of the results of the CHEA Initiative, a multi-year national conversation on the future of accreditation undertaken by the Council for Higher Education Accreditation (CHEA) in 2008. The Initiative focused on building support for two major goals: (1) to sustain a balance and distinction between accountability to the federal government and the academic work of accreditation and (2) to enhance accountability in accreditation. In the course of the discussion and seeking support for these goals, eight major issues emerged.

The Initiative constituted an unprecedented national dialogue on accreditation that has influenced many deliberations of academic quality and accountability. Based on this dialogue and the issues, CHEA is putting forward six actions that, if implemented successfully, can result in significant progress with regard to the Initiative's two major goals.

The federal climate for accreditation added a sense of urgency to act as the CHEA Initiative came to a close. The U.S. Congress had held hearings and introduced legislation affecting such vital academic issues as credit hour determination and transfer of credit. These actions make clear that Congress believes there is a need to further regulate accreditation and is poised to assert further oversight. The U.S. Department of Education, through its recently expanded regulatory capacity and its detailed focus on the operation of accreditation through its periodic review of accrediting organizations (recognition), has asserted authority over accreditation similar to that of a ministry of education in other countries. A fundamental shift of responsibility and authority for academic judgments is taking place, away from the accreditation and academic communities to government.

BACKGROUND: ORIGINS OF THE INITIATIVE AND PROCESS USED

The *CHEA Initiative*, a multi-year national conversation on the future of accreditation, sought to build support to (1) sustain a balance and distinction between accountability to the federal government and the academic work of accreditation – its focus on institutional mission and independence, peer/professional review and quality improvement – and (2) enhance accountability in accreditation. Through the *Initiative*, CHEA sought consensus for action by the accreditation and academic communities, as well as preparing for the next reauthorization of the Higher Education Act in 2013 or thereafter.

The origin of the concept of CHEA sustaining an ongoing national conversation to engage the most pressing issues confronting accreditation dates back to the recommendations of the CHEA Tenth Anniversary Commission, a group of approximately 50 institutional presidents, leaders of accrediting organizations, corporate executives and policymakers appointed by the CHEA Board of Directors, that met during 2006-07. Responding to one of these recommendations, the board approved the establishment of the *CHEA Initiative* in 2008.

In addition to the recommendation of the commission, completion of the reauthorization of the Higher Education Act in August 2008 influenced the board's decision. The CHEA Board of Directors noted that the amended law reflected a significant shift in the accreditation-federal government relationship: the increasing tendency on the part of government to become more engaged in the academic work and academic judgment that traditionally had been the province of colleges, universities and accrediting organizations. This needed to be addressed.

The conduct of recognition of accrediting organizations within USDE has become a process of ongoing, detailed scrutiny with which accreditors are almost constantly engaged.

During the four years of work, the *CHEA Initiative* involved five CEO/CAO Roundtables with member institutions, 22 meetings with accrediting commissions, eight National Accreditation Fora and one student focus group for a total of 36 meetings – an unprecedented national dialogue on accreditation with some 2,500 colleagues around the country. The roundtables and commission meetings took CHEA to 11 states, including multiple visits to a number of states, in addition to its work in the District of Columbia where CHEA is headquartered. CHEA also published 15 white papers and meeting summaries as well as conducted an online survey of member institutions and accrediting organizations to gauge the importance of the goals of the *Initiative*.

During this same time period, the U.S. Department of Education (USDE) held negotiated rulemakings to implement the reauthorized law (2009, 2010 and 2011). These meetings, too, affirmed that this tendency toward government regulation supplanting self-regulation was accelerating, to the point where we have had, since the law was amended, 150 new regulations affecting higher education, many of which also affect accreditation. The net impact has been to create a serious imbalance in the public-private partnership of accreditation and government that had prevailed since 1952,

moving toward a superordinate role for government and a subordinate government-agency role for accreditation.

The imbalance is most prominent in the periodic review of accrediting organizations that USDE undertakes, a requirement for accreditors that serve as gatekeepers for access to federal funds. An institution or program must be accredited by an organization that, in turn, is reviewed and accepted (recognized) by the federal government. CHEA has been particularly focused on this development because of the deleterious implications for the independence of accreditation and academic decision-making of colleges and universities, as well as the potential harm to the vital role that accreditation plays in quality improvement. CHEA heard repeatedly, throughout the *Initiative* discussion, that colleges, universities and accrediting organizations were deeply concerned about this development.

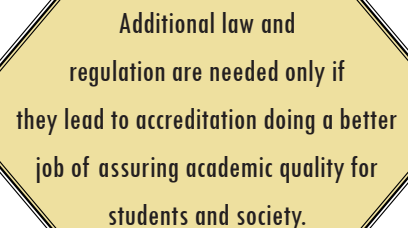
THE URGENCY OF THE CURRENT CONTEXT

As the *CHEA Initiative* was drawing to a close, clear signals from the U.S. Congress and the USDE reinforced the importance of addressing both the accreditation-federal government relationship and additional capacity for accountability within accreditation. During 2012, Congress has prepared or introduced legislation addressing credit hour determination and transfer of credit, two core academic decisions that are the responsibility of colleges and universities, not government. There has been growing talk of the need for more regulation of accreditation itself, emerging from hearings on the for-profit sector, but encompassing the nonprofit sector as well.

The conduct of recognition of accrediting organizations within USDE has become a process of ongoing, detailed scrutiny with which accreditors are almost constantly engaged, limiting the time available that these bodies can commit to work with institutions and programs to enhance quality. Recognition is becoming an end in itself, increasingly divorced from the core purpose of accreditation: to assure and improve the quality of education for students. Regulation is becoming a form of evaluation, with nothing too unimportant for scrutiny. This includes, for example, regulating to assure that the head of an accrediting body's biographical statement is on a Website and to require that an announcement about an accreditation action that is sent to various bodies such as state governments or USDE as a single memorandum to multiple parties instead be addressed individually to each party.

Also during 2012, the future of this USDE scrutiny was addressed by the National Advisory Committee on Institutional Quality and Integrity (NACIQI), a federal committee of academic and public members advising the Secretary of Education on the recognition of accrediting organizations. The 2012 report to the Secretary prepared by NACIQI calls for even greater expansion of USDE oversight, asserting that quality assurance is a federal interest requiring federal goals for the use of federal funds and federal judgment, through accreditation, of the quality of individual institutions. A fundamental shift of responsibility and authority for academic judgments is taking place, away from the accreditation and academic communities to government.

The higher education and accreditation committees are now preparing for another reauthorization of the Higher Education Act, perhaps to begin in 2013 or early 2014, in an environment of strong indications from Congress and USDE that accreditation is viewed as an instrument of government for the purposes of quality and quality assurance, with little attention to the vital features that have made accreditation effective: peer review and collegial consultation to determine quality.



Additional law and regulation are needed only if they lead to accreditation doing a better job of assuring academic quality for students and society.

EIGHT ISSUES: TOPICS OF GREATEST CONCERN AND INTEREST

Eight broad issues emerged from the national dialogue. They range across the many dimensions of accreditation and reflect both its strengths and the tensions inherent in any system of self-regulation. Although discussed on a number of occasions, participants in the *Initiative* discussions were not interested in establishing priorities among the issues or eliminating some of them, perhaps indicating that all continue to resonate. The issues not only address the two *Initiative* goals, but also speak to the depth of commitment to effective accreditation.

1. Advocacy for accreditation

Accreditation is highly valued in the academic community. There is a need for even greater advocacy to sustain its respect and credibility, especially with government and the public.

2. Accreditation's relationship with the federal government

There is growing worry that the federal government is taking on academic issues and using federal recognition for this purpose, in contrast to turning to institutions and accreditors to provide this leadership.

3. *Accreditation and accountability*

There is agreement that accreditors, institutions and programs have done a great deal to address accountability – but, at the same time, more needs to be done. There is limited consensus to date about what counts as successful accountability for all of higher education.

4. *Accreditation’s relationship with state governments*

There is a perceived need to sort out the relationship between states and accrediting organizations and to achieve parity among types of accreditors as this relates to transfer of credit, licensure of schools and licensure of students.

5. *The relationship between institutions and accrediting organizations*

Accreditation is viewed as both valuable and burdensome, with the student achievement issue looming large. There is a need to enhance shared understanding about the evolving role of accreditation.

6. *The relationships among accreditors*

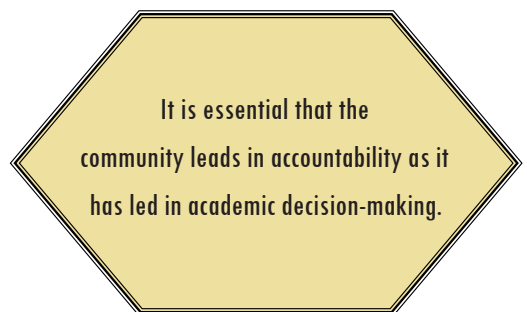
There are calls for more trust and sharing, more attention to effective practices and more working together.

7. *International activity*

Many colleges and universities have expanded their international offerings, accompanied by additional scrutiny from accrediting organizations. Accreditors spoke to the desirability of sharing ideas and effective practices for accrediting internationally. There are calls for a single set of international standards for some fields.

8. *The growth of the for-profit sector*

As for-profit higher education continues to expand, there is a need to understand similarities and differences between this sector and nonprofit higher education.



ACCOUNTABILITY AND THE INITIATIVE

In addition to affirming the importance of some modification to the accreditation-federal government relationship, the *Initiative* resulted in clear affirmation of the need for the academy to further shape and provide additional leadership for public accountability. Only colleges, universities and faculty are appropriately equipped to meld current

accountability expectations with a sustained commitment to peer review, institutional autonomy, mission and academic freedom.

The multi-year dialogue also made clear the preferred path to more robust accountability. Accreditation and higher education colleagues were emphatic in their commitment to mission-driven accountability, with judgments especially about student achievement or student learning left to peers within the academy. As long as accrediting organizations and institutions sustain institutionally and programmatically based accountability, significant progress will continue to be made. Approaches that include standardization or externally imposed comparability or that reduce judgment about quality to a formulaic approach that fails to reflect the complexities of teaching, learning and student achievement were clearly viewed as undesirable.

FOR THE FUTURE: SIX ACTIONS

Based on the four years of deliberation, CHEA has formulated a six-point action plan. These six actions offer substantive responses to what was learned during the *CHEA Initiative* dialogue. Three actions address federal policy; one addresses advocacy for accreditation; one addresses international activity and one action addresses the three issues that focus on relationships – between institutions and accreditors, among accreditors and between the nonprofit and for-profit sectors. In some instances, the actions address *CHEA Initiative* issues through activities previously approved by the CHEA Board of Directors.

Federal Policy and Balance in the Accreditation-Federal Government Relationship

With regard to the accreditation-government relationship and the gatekeeping role of accreditation, the dialogue confirmed that the community prefers that this relationship be sustained but urges both caution and restraint. The increasing tendency within this relationship for both the executive and legislative branches to engage in academic judgments (credit hour determination, student achievement goals) remains undesirable. Recognition reviews were a focal point of this concern.

The community was clear that the balance between accreditation and government needs to be one where government holds accreditation accountable as a reliable authority on academic quality, not one in which government engages in academic decision-making on its own. Government is not to become a “co-accreditor,” challenging the decisions that accrediting organizations make with regard to individual institutions and programs. The community does not want government becoming both highly directive and prescriptive about day-to-day accrediting activities such as how, for example, appeals panels are

composed or how accrediting commission members are selected. Additional law and regulation are needed only if they lead to accreditation doing a better job of assuring academic quality for students and society.

These judgments heard during the *CHEA Initiative* dialogue made clear that the following need to be addressed as the next reauthorization of the Higher Education Act gets underway:

1. Working with the academic and accreditation communities and reaching out to Congress and USDE, seek to restate and reframe the different responsibilities of the federal government and accreditation with regard to academic quality and the performance of institutions, based on the premise of the independence of accreditation described above, clearly separating and respecting the roles of the nongovernmental and governmental sectors.
2. Working with the academic and accreditation communities and reaching out to Congress and USDE, seek to modify the recognition relationship between USDE and accrediting organizations by streamlining the recognition process such that primary attention is paid to demonstrably enhancing the strength and effectiveness of accreditation – in contrast to detailed compliance-driven reviews that are often unrelated to this effectiveness. Obedience to regulation does not assure quality.

These efforts will also involve working with states, given the extent to which current federal law and regulation address state activity with regard to accreditation.

Leadership for Public Accountability

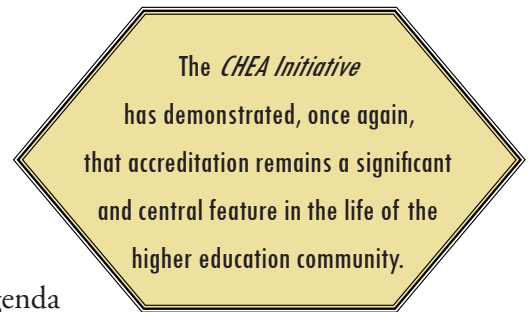
It is unlikely that progress will be made on these actions absent the academy making an even greater commitment to public accountability, even beyond current efforts described below. It is essential that the community leads in accountability as it has led in academic decision-making. Given this reality, CHEA is adding an additional action:

3. Working with the academic and accreditation communities, explore the adoption and implementation of a small set of voluntary institutional performance indicators based on mission that can be used to signal acceptable academic effectiveness and to inform students and the public of the value and effectiveness of accreditation and higher education. Such indicators would be determined by individual colleges and universities, not government.

This third action builds on much of the work done during the past 15 years, led by accrediting organizations, institutions and associations that provides a foundation for this leadership for public accountability. The work reflects the complexity that accompanies addressing accountability, with many perspectives and differing views expressed by the community. Extensive work on further strengthening standards and policies to address student achievement and transparency is being carried out by regional, national and programmatic accreditors. Institutions and associations are similarly engaged with projects such as Liberal Education and America's Promise (Association of American Colleges and Universities), College Portrait: Voluntary System of Accountability (Association of Public and Land-grant Universities and the American Association of State Colleges and Universities), the Voluntary Framework for Accountability (American Association of Community Colleges), the CIC/Collegiate Learning Assessment Consortium (Council of Independent Colleges) and Committing to Quality (New Leadership Alliance for Student Learning and Accountability).

Additional Actions

The remaining *CHEA Initiative* issues – advocacy, international quality assurance, the nonprofit/for-profit sectors, relationship between institutions and accreditors and relationship among accreditors – are addressed outside the accreditation-government relationship. They constitute an emerging working agenda for CHEA in serving its members and the accrediting community through its organizational activity. They can contribute to the robustness and resilience of accreditation and are responsive to the expressed needs and interests of institutions and accreditors.



Advocacy

4. As approved by the board of directors, CHEA is undertaking an Accreditation Advocacy Campaign intended to (1) build support in Congress and the Executive Branch for the importance and value of self-regulation and peer/professional review in higher education and (2) enhance public confidence in self-regulation and peer/professional review.

The advocacy campaign is responsive to what has been learned during the *CHEA Initiative* dialogue by focusing on the fundamental values of higher education and accreditation: self-regulation, peer/professional review, institutional independence and

academic freedom. Key messages associated with the advocacy campaign will be built around:

- Informing the academic community of the unprecedented challenge to self-regulation.
- Establishing the importance of additional investment in peer/professional review as vital to the future of higher education and essential to assuring the quality of higher education for students and the public.
- Making the case for the importance of institutional and faculty leadership to academic quality.
- Clarifying and emphasizing the distinction between accountability to government and accountability for academic quality and leadership.

International Quality Assurance

5. As approved by the board of directors, CHEA has established a CHEA International Quality Group (CIQG). Its purpose is to provide service related to international higher education quality to member institutions, accreditation/quality assurance organizations, higher education associations, students, government and employers. These services are intended to advance understanding of international quality assurance, assist institutions and accreditation/quality assurance organizations in their expanding international engagement and further enhance capacity for academic quality in international higher education. In response to what was learned during the *CHEA Initiative* dialogue, CIQG will focus on capacity-building for U.S. accrediting organizations in particular, aiding accreditors as they make decisions whether or not to operate internationally, where and how.

The CIQG will:

- Serve as a U.S. forum for international quality assurance.
- Identify and explore key international quality policy issues.
- Provide consultation services to institutions, accreditation/quality assurance organizations, governments and other organizations within and outside the United States.
- Work with other U.S. and international organizations to address future international quality challenges, opportunities and concerns.

Key Relationships

The three remaining issues of the *Initiative* all focus on relationships: institutions and accreditors, accreditors and accreditors and nonprofit and for-profit institutions and accreditors.

6. CHEA can best serve its constituents and the public by continuing its strong role as a convener of the accreditation and academic communities, as a source of research and policy analysis for higher education and accreditation and as a resource to strengthen partnerships among accreditors, institutions and programs.

SUMMARY

The six actions resulting from the *CHEA Initiative* provide a needed foundation for future work in accreditation, especially preparation for reauthorization of the Higher Education Act. The actions are to:

1. Restate and reframe the division of responsibilities between government and accreditation.
2. Streamline the federal recognition review of accrediting organizations.
3. Explore creation and adoption of voluntary, institutionally based performance indicators to inform the public and students.
4. Initiate an Accreditation Advocacy Campaign.
5. Develop the CHEA International Quality Group.
6. Address, through CHEA's existing structure of conferences and meetings, institution-accreditor relationships and accreditor-accreditor relationships, including the nonprofit and for-profit sectors working together.

The four years of work on the *CHEA Initiative* have provided a solid foundation for future efforts in federal policy as well as accreditation policy and practice. The many voices in the accreditation discussion have yielded valuable insights and understanding, for the community and for CHEA. We know more about our areas of agreement and our areas of difference. We are better informed about our commitment to the present and our capacity and tolerance for change. We have tested our beliefs about the value of accreditation and about its limitations. The *CHEA Initiative* has demonstrated, once again, that accreditation remains a significant and central feature in the life of the higher education community.

CHEA Initiative Documents

The following are presentations, summaries of proceeding and comments from participants at CHEA National Accreditation Fora, presentations from CHEA annual conferences and white papers published as part of the *CHEA Initiative*.

2011-2012

- [*The CHEA Initiative 2011-2012: The Fourth Year: From Discussion to Action*](#)
- [*Quality Assurance in Higher Education in the Twenty-First Century and the Role of the Council for Higher Education Accreditation*](#) (August 2011) (pdf)
Fred Harclerod, Higher Education Consultant

2010-2011

- [*The CHEA Initiative: The First Three Years \(2008-2011\)*](#)
- [*Summary of Proceedings: CHEA Initiative Sixth National Accreditation Forum: Establishing a Framework for Action*](#)
- [*The CHEA Initiative 2008-2010: The First Two Years: Participants Speak Out*](#)

2009-2010

- [*The CHEA Initiative: Building the Future of Accreditation: The Second Year \(2009-2010\)*](#)

2008-2009

- [*Second National Accreditation Forum Roundtable Comments*](#) (January 2009) (pdf)
- [*Recalibrating the Accreditation-Federal Relationship*](#) (Presentation) (January 2009) (pdf)
Robert Dickeson, President Emeritus, University of Northern Colorado
- [*Recalibrating the Accreditation-Federal Relationship*](#) (White Paper) (January 2009) (pdf)
Robert Dickeson, President Emeritus, University of Northern Colorado

(continued)

- [*Where Do We Take Accreditation?*](#) (January 2009) (pdf)
Stanley Ikenberry, President Emeritus and Regent Professor, University of Illinois at Urbana-Champaign
- [*Who Watches the Watchman? Thoughts on the Federal Relationship to Accreditation in Higher Education*](#) (January 2009) (pdf)
Matthew Finkin, The Albert J. Harno and Edward W. Cleary Chair in Law, University of Illinois College of Law
- [*Self Regulation – Government Regulation Relationship*](#) (September 2008) (pdf)
Mark L. Pelesh, Executive Vice President, Corinthian Colleges, Inc.
- [*Accreditation's Dilemma: Serving Two Masters – Universities and Government*](#) (September 2008) (pdf)
A. Lee Fritschler, Professor, School of Public Policy, George Mason University
- [*The Council for Higher Education Accreditation and Recognized Accrediting Organizations*](#) (September 2008) (pdf)
Fred Harclerod, Higher Education Consultant
- [*Higher Education, Accreditation and Regulation*](#) (September 2008) (pdf)
Milton Greenberg, Professor Emeritus of Government, American University

A national advocate and institutional voice for self-regulation of academic quality through accreditation, CHEA is an association of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations.

CHEA

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