



The Accreditation Backstory – An Inside View

Marsal P. Stoll, EdD, MSN, BSN

Chief Executive Officer

Accreditation Commission for Education in Nursing

QUESTION

What year was the first institutional accrediting agency established?

- A. 1887
- B. 1895
- C. 1938
- D. 1952

ANSWER



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What agency was the first institutional accrediting agency?

- A. Accrediting Commission of Career Schools and Colleges (ACCSC)
- B. Southern Association of Colleges and Schools (SACS)
- C. New York State Board of Regents, and the Commissioner of Education
- D. Middle States Commission on Higher Education (MSCHE)

ANSWER



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- A. 1867
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- D. 1979

ANSWER



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Stay tuned....

What agency was the first specialized/programmatic accrediting agency recognized by the U.S. Department of Education?

- A. National Association of Schools of Music, Commission on Accreditation
- B. American Bar Association, Council of the Section of Legal Education and Admissions to the Bar
- C. NLN/Accreditation Commission for Education in Nursing
- D. Commission on Accrediting of the Association of Theological Schools

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ANSWER



What agency was the first specialized/programmatic accrediting agency recognized by the U.S. Department of Education?

- Association for Biblical Higher Education, Commission on Accreditation
- Commission on Accrediting of the Association of Theological Schools
- Accreditation Council for Pharmacy Education
- American Dental Association, Commission on Dental Accreditation
- American Occupational Therapy Association, Accreditation Council for Occupational Therapy Education

ANSWER



What agency was the first specialized/programmatic accrediting agency recognized by the U.S. Department of Education?

- American Optometric Association, Accreditation Council on Optometric Education
- American Osteopathic Association, Commission on College Accreditation
- American Podiatric Medical Association, Council on Podiatric Medical Education
- American Veterinary Medical Association, Council on Education
- Council on Accreditation of Nurse Anesthesia Educational Programs
- Liaison Committee on Medical Education

What is accreditation?

Accreditation is a quality improvement/quality enhancement process to ensure that institutions of higher education at the institutional-level and/or program-level meet acceptable levels of educational quality.

Accreditation is voluntary and must be requested by educational institutions or programs.

What is an accrediting agency?

Accrediting agencies are private associations of regional or national scope that focus on quality improvement/quality enhancement in institutions of higher education.

What is an accrediting agency?

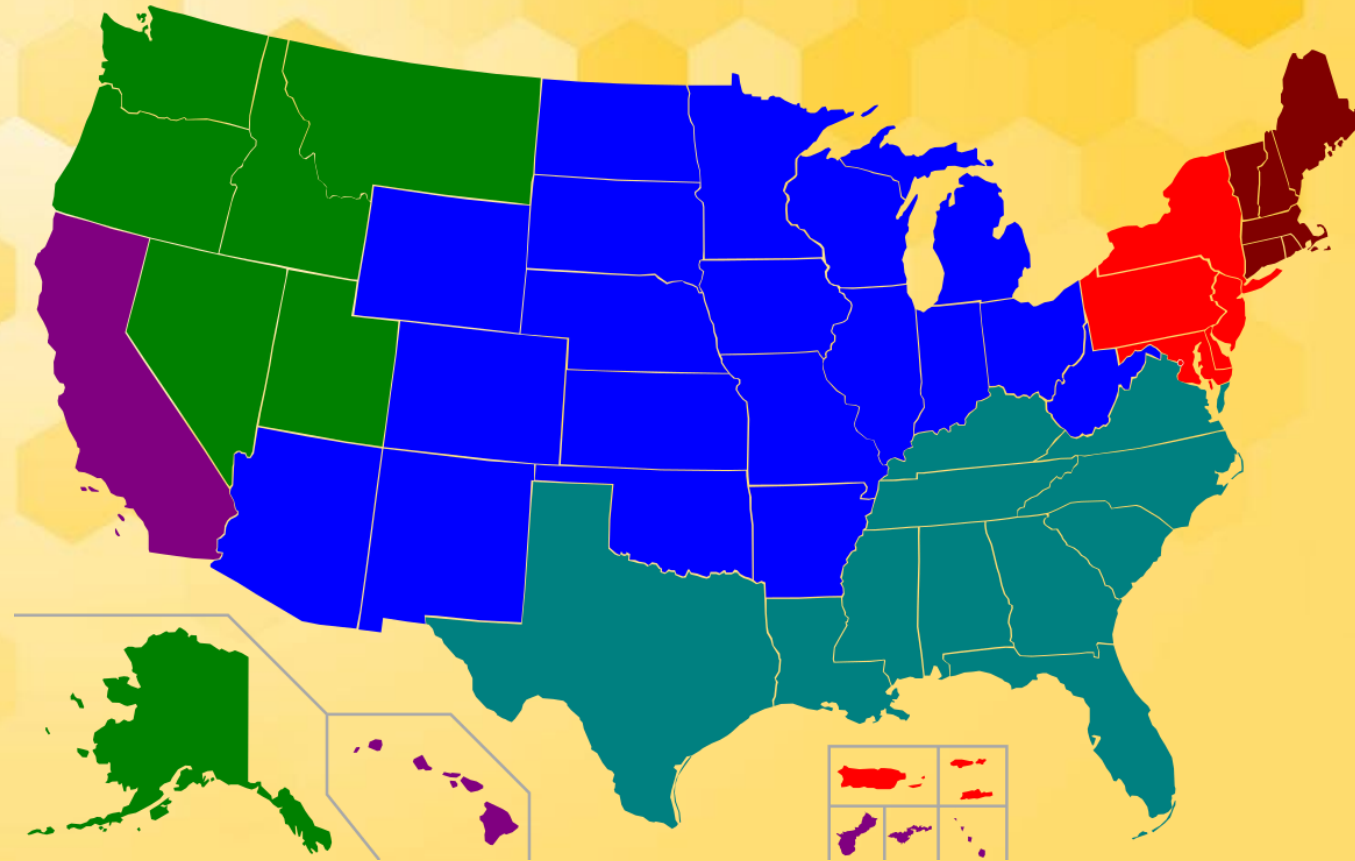
There are three general types of accrediting agencies, each of which serves a specific purpose.

- Regional accrediting agencies operate in six regions of the United States and focus on institutions of higher education within specific regions of the country.
- National accrediting agencies operate across the United States and focus on institutions with a common theme (e.g., religiously affiliated institutions).
- Programmatic/Specialized accrediting agencies operate nationwide and focus on programs and single-purpose institutions.

What is an accrediting agency?

- Institutional accreditation applies to an entire institution, indicating that each of an institution's parts is contributing to the achievement of the institution's objectives. The regional and national accreditors perform institutional accreditation.

Regional accrediting agency



Regional accrediting agency

- Higher Learning Commission
- Middle States Commission on Higher Education
- New England Commission of Higher Education
- Northwest Commission on Colleges and Universities
- Southern Association of Colleges and Schools Commission on Colleges
- Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges
- WASC Senior Colleges and University Commission

National accrediting agency



National accrediting agency

NATIONAL FAITH-RELATED ACCREDITING ORGANIZATIONS

- Association for Biblical Higher Education Commission on Accreditation
- Association of Advanced Rabbinical and Talmudic Schools Accreditation Commission
- Association of Colleges of Jewish Studies
- Commission on Accrediting of the Association of Theological Schools
- Transnational Association of Christian Colleges and Schools Accreditation Commission

National accrediting agency

NATIONAL CAREER-RELATED ACCREDITING ORGANIZATIONS

- Accrediting Bureau of Health Education Schools
- Accrediting Commission of Career Schools and Colleges
- Accrediting Council for Continuing Education and Training
- Accrediting Council for Independent Colleges and Schools
- Council on Occupational Education
- Distance Education Accrediting Commission
- National Accrediting Commission of Career Arts and Sciences, Inc.

What is an accrediting agency?

- Specialized or programmatic accreditation normally applies to programs, departments, or schools that are part of an institution of higher education.
- The accredited unit may be as large as an institution of higher education or school within an institution of higher education or as small as a curriculum within a discipline.
- Most of the specialized or programmatic accreditors review units within an institution of higher education that is accredited by one of the regional or national accreditors.
- However, certain accreditors also accredit professional schools and other specialized or vocational institutions of higher education that are freestanding in their operations.
- Thus, a "specialized" or "programmatic" accreditor may also function in the capacity of an "institutional" accreditor. Some of these "institutions" are found within non-educational settings, such as hospitals.

Programmatic/Specialized accrediting agencies

- Currently 79 USDE and/or CHEA recognized programmatic/specialized accrediting agencies
- Agencies holding USDE and/or CHEA Recognition:
https://www.chea.org/sites/default/files/other-content/CHEA_USDE_AllAccred_8.pdf

TIME OUT FOR QUESTIONS



How does an accrediting agency become recognized?

- U.S. Department of Education (USDE)
- Council on Higher Education Accreditation (CHEA)

Summary of USDE Process (CHEA Process is Similar)

- An accreditor seeking recognition from the Secretary of Education must meet the Department's regulatory criteria for the recognition of accreditors, and must have a link to a federal program to be recognized by the USDE (e.g., federal student aid, HRSA).
- Federal link not required for CHEA recognition
- Only accreditors recognized by the Secretary can provide the gate-keeping function to allow institutions they accredit to participate in the federal student aid programs under the Higher Education Act.

Summary of USDE Process

- The process for the recognition of accreditors is set forth in 34 CFR Part 602 Subpart C.
- https://ecfr.io/Title-34/cfr602_main

Summary of USDE Process

- The agency must meet eligibility requirements to serve as an accrediting agency.
 - If eligible, an agency seeking initial recognition must demonstrate that it has granted accreditation or pre-accreditation:
 - > to one or more institutions if it is requesting recognition as an institutional accrediting agency and to one or more programs if it is requesting recognition as a programmatic accrediting agency
 - > to cover the range of the specific degrees, certificates, institutions, and programs for which it seeks recognition
 - > in the geographic area for which it seeks recognition
 - If eligible, an agency seeking initial recognition must conduct accrediting activities, including deciding whether to grant or deny accreditation or pre-accreditation, for at least two years prior to seeking recognition.

Summary of USDE Process

The agency must demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by (a) educators and educational institutions; and (b) licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions or programs within the agency's jurisdiction prepare their students.

Summary of USDE Process

An accrediting agency seeking initial or continued recognition must submit a written application to the Secretary.

Each accrediting agency must submit an application for continued recognition at least once every five years, or within a shorter time period specified in the final recognition decision. The application must consist of:

- a statement of the agency's requested scope of recognition
- evidence, including documentation, that the agency complies with the criteria for recognition and effectively applies these criteria
- evidence of how an agency that includes or seeks to include distance education or correspondence education in its scope of recognition applies its standards in evaluating programs and institutions it accredits that offer distance education or correspondence education

Summary of USDE Process

After receipt of an agency's application for initial or continued recognition, Department staff publishes a notice of the agency's application or report in the Federal Register inviting the public to comment on the agency's compliance with the criteria for recognition and establishing a deadline for receipt of public comment.

Summary of USDE Process

The Department staff analyzes the agency's application for initial or renewal of recognition to determine whether the agency satisfies the criteria for recognition, taking into account all available relevant information concerning the compliance of the agency with those criteria and in the agency's effectiveness in applying the criteria.

The analysis of an application for recognition includes

- a) observations from site visit(s), on an announced or unannounced basis, to the agency or to a location where agency activities such as training, review and evaluation panel meetings, and decision meetings take place and to one or more of the institutions or programs it accredits or pre-accredits;
- b) review of the public comments and other third-party information the Department staff receives by the established deadline, and the agency's responses to the third-party comments, as appropriate, as well as any other information Department staff assembles for purposes of evaluating the agency; and (c) review of complaints or legal actions involving the agency.

Department staff's evaluation of an agency may also include a review of information directly related to institutions or programs accredited or pre-accredited by the agency relative to their compliance with the agency's standards, the effectiveness of the standards, and the agency's application of those standards.

Summary of USDE Process

If, at any point in its evaluation of an agency seeking initial recognition, Department staff determines that the agency fails to demonstrate compliance with the basic eligibility requirements, the staff

- a) returns the agency's application and provides the agency with an explanation of the deficiencies that caused staff to take that action and
- b) recommends that the agency withdraw its application and reapply when the agency can demonstrate compliance.

Summary of USDE Process

Except with respect to an application that has been returned or is withdrawn, when Department staff completes its evaluation of the agency, the staff:

- prepares a written draft analysis of the agency;
- sends the draft analysis, including any identified areas of non-compliance and a proposed recognition recommendation, and all supporting documentation, including all third-party comments the Department received by the established deadline, to the agency;
- invites the agency to provide a written response to the draft analysis and proposed recognition recommendation and third-party comments, specifying a deadline that provides at least 30 days for the agency's response; and
- reviews the response to the draft analysis the agency submits, if any, and prepares the written final analysis.

Summary of USDE Process

Before the Advisory Committee meeting, Department staff provides the Advisory Committee with the following information:

- the agency's initial recognition application or renewal of recognition application and supporting documentation;
- the final Department staff analysis and any supporting documentation;
- the agency's response to the draft analysis if requested by the Advisory Committee;
- any written third-party comments the Department received about the agency as well as any agency response to third-party comments; and
- any other information Department staff relied upon in developing its analysis.

Summary of USDE Process

- At least 30 days before the Advisory Committee meeting, the Department publishes a notice of the meeting in the Federal Register inviting interested parties, including those who submitted third-party comments concerning the agency's compliance with the criteria for recognition, to make oral presentations before the Advisory Committee.

Summary of USDE Process

- The Advisory Committee considers the materials provided in a public meeting and invites Department staff, the agency, and other interested parties to make oral presentations during the meeting.
- A transcript is made of all Advisory Committee meetings, which is publically available after the meeting.

Summary of USDE Process

- The written motion adopted by the Advisory Committee regarding each agency's recognition will be made available during the Advisory Committee meeting. The Department will provide each agency, upon request, with a copy of the motion on recognition at the meeting. Each agency that was reviewed will be sent an electronic copy of the motion relative to that agency as soon as practicable after the meeting.

Summary of USDE Process

- After each meeting of the Advisory Committee at which a review of agencies occurs, the Advisory Committee forwards to the senior Department official its recommendation with respect to each agency, which may include, but is not limited to, a recommendation to approve, deny, limit, suspend, or terminate recognition, to grant or deny a request for expansion of scope, to revise or affirm the scope of the agency, or to require the agency to submit a compliance report and to continue recognition pending a final decision on compliance.

Summary of USDE Process

- Within ten days following the Advisory Committee meeting, the agency and Department staff may submit written comments to the senior Department official on the Advisory Committee's recommendation. The agency must simultaneously submit a copy of its written comments, if any, to Department staff. Department staff must simultaneously submit a copy of its written comments, if any, to the agency.

Summary of USDE Process

- The senior Department official makes a decision regarding recognition of an agency based on the record compiled.

Summary of USDE Process

What happens if an agency isn't recognized?

- The USDE has due process to appeal an adverse action if an agency decides to appeal its decision. If appealed and the Department's decision is upheld then the agency is not recognized and any institution/program that was seeking the agency's accreditation or any institution/program that held the agency's accreditation would not be accredited. The agency may pursue recognition again, if it chooses to.

TIME OUT FOR QUESTIONS



ANSWER



What year did the U.S. Department of Education first recognize accrediting agencies?

- A. 1867
- B. 1952**
- C. 1965
- D. 1979

Why 1952?

- Accreditation began as a voluntary process, with the federal government playing no role in quality assurance.
- This changed in 1944, when the GI Bill allowed veterans to use federal funds to attend any qualified institution of their choice.
- After an initial effort to rely on states to create lists of approved institutions resulted in concerns about low-quality institutions being established to access federal funds, the federal government faced a choice (House Select Committee, 1951). It could either create its own list of approved institutions or rely on the existing private-sector accrediting system that operated separately from the states to serve as a gatekeeper for federal financial aid.

Why 1952?

- While still “voluntary”, in the Veterans Readjustment Assistance Act in 1952, lawmakers chose to rely on accreditors to ensure minimum quality standards because they were satisfied with accreditors’ ability to assure educational quality, and today, accreditation remains a necessary condition of receiving federal financial aid (Conway 1979).

What are primary accrediting activities?

- **Standards:** The accreditor, in collaboration with educational institutions and/or programs, establishes standards.
- **Self-study:** The institution or program seeking accreditation prepares an in-depth self-evaluation report that measures its performance against the standards established by the accreditor.
- **On-site evaluation:** A team of peers selected by the accreditor reviews the institution or program on-site to determine first-hand if the applicant meets the established standards.

What are primary accrediting activities?

- **Decision and publication:** Upon it is determined that the applicant meets its standards, the accreditor grants accreditation or pre-accreditation status and lists the institution or program in an official publication with other similarly accredited or pre-accredited institutions or programs. Only public and private non-profit institutions can qualify to award federal student aid based on pre-accreditation.
- **Monitoring:** The accreditor monitors each accredited institution or program throughout the period of accreditation granted to verify that it continues to meet the accreditor's standards.
- **Reevaluation:** The accreditor periodically reevaluates each institution or program that it lists to ascertain whether continuation of its accredited or pre-accredited status is warranted.

The USDE role is primary accrediting activities – 34 CFR Part 602.16

- a) The agency must demonstrate that it has standards for accreditation, and pre-accreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if—
 - 1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:
 - i. Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of State licensing examinations, course completion, and job placement rates.
 - ii. Curricula.
 - iii. Faculty.

The USDE role is primary accrediting activities – 34 CFR Part 602.16

- iv. Facilities, equipment, and supplies.
- v. Fiscal and administrative capacity as appropriate to the specified scale of operations.
- vi. Student support services.
- vii. Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.

The USDE role is primary accrediting activities – 34 CFR Part 602.16

- viii. Measures of program length and the objectives of the degrees or credentials offered.
- ix. Record of student complaints received by, or available to, the agency.
- x. Record of compliance with the institution's program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency; and

The USDE role is primary accrediting activities – 34 CFR Part 602.16

- f) Nothing in paragraph (a) of this section restricts—
 - 1) An accrediting agency from setting, with the involvement of its members, and applying accreditation standards for or to institutions or programs that seek review by the agency; or
 - 2) An institution from developing and using institutional standards to show its success with respect to student achievement, which achievement may be considered as part of any accreditation review.

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Current Issues With Accreditation and Accrediting Agencies

- Accreditors face political pressure to impose tougher standards on institutions, especially as the federal government provides billions of dollars in federal Title IV financial aid to students
- Perceived unsatisfactory student outcomes
 - Loan default rates
https://nslds.ed.gov/nslds/nslds_SA/defaultmanagement/search_cohort_2015_CY.cfm
 - Job placement rates
 - Graduation rates (based on IPEDS) <https://nces.ed.gov/fastfacts/display.asp?id=40>
 - Skills/knowledge
- Failed institutions - Corinthian, ITT, Brightwood, etc.

Current Issues With Accreditation and Accrediting Agencies

- Accreditors' efforts to deny an institution accreditation has resulted in lawsuits from the institution and pressure from lawmakers.
- St. Andrews University (TN)
- Paul Quinn College (TX)
- Pane College (GA)
- WMU-Cooley Law School
- WMU: <https://www.mlive.com/news/kalamazoo/index.ssf/2018/11/wmu-cooley-law-settles-lawsuit.html>
- **How Ailing institutions Stay Accredited:**
<https://www.wsj.com/articles/institutions-seek-workarounds-to-keep-their-seal-of-approval-1436206962>

Current Issues With Accreditation and Accrediting Agencies

"Backscratching"

- Eighty percent of the regional accrediting agency trustees and 62 percent of national agencies trustees are employed by an institution accredited by that accrediting agency.
- Is the fox guarding the hen house?

Current Issues With Accreditation and Accrediting Agencies

The regional accreditation system is a "cartel"

- An institution can only use the regional accreditor that serves its area. However, as applicable, an institution can use any national accrediting agency.
- Does the absence of competition lead an institutional or programmatic/specialized accrediting agency to set standards that are lower than desirable?
- Does the absence of competition allow low performing institutions to continue to exist and thus, students attending low performing institutions, to receive federal financial aid?

Current Issues With Accreditation and Accrediting Agencies

Current accrediting agencies are not suited to handle non-institutional educational providers

- A growing number of companies are teaching individual courses/programs and these companies don't qualify to be an institution with degree or certificate offerings. However, USDE regulations only allow financial aid to be granted to students enrolled in an institution that awards degrees and certificates.

Current Issues With Accreditation and Accrediting Agencies

Accreditation is too focused on financial metrics and not sufficiently focused on student learning

- Government Accountability Office reported that institutions were far more likely to be denied accreditation for financial reasons than academic reasons
- *Wall Street Journal* reported that 11 regionally accredited four-year institutions had graduation rates below 10 percent.

Current Issues With Accreditation and Accrediting Agencies

The accreditation process is too burdensome and expensive

- Preparing for and conducting a comprehensive, quality review takes too much human, physical, and financial resources.
- Is this really true given that peer evaluators are volunteers?
- How much should a comprehensive, quality review conducted by an institution or a program “cost” in terms of internal and external human, physical, and financial resources?
- Should “flagship” institutions and programs be held to the same or different requirements?

Solutions to Current Issues With Accreditation and Accrediting Agencies

- Restructure/streamline accreditation – choice of regional accreditor, consolidate into only one regional accreditor; consolidate into one regional accreditor by degree level and/or sector
- Dictate quality measures and bright line outcome indicators
- Restructure/streamline accreditation process – risk-based accreditation
- Revise 34 CFR Part 602 Subpart C; **this is currently occurring**
- Open up access to federal financial aid to new “accreditors”
- Untether access to federal financial aid from accreditation and accrediting agencies
- Pass new/revised higher education act

Current Issues With the USDE

U.S. Department of Education Office of Inspector General in June 2018 found that the Office of Post-Secondary Education of the USDE doesn't practice what it requires accrediting agencies to do

Current Issues With the USDE

Office for Post-Secondary Education (OPE) has a formal process for reviewing agency petitions for recognition that incorporated the petition review procedures required under 34 C.F.R. § 602.32.

- **Findings:** OPE's process did not provide reasonable assurance that the Department recognized only accrediting agencies meeting Federal recognition criteria.
- **Finding:** Several weaknesses related to OPE's agency petition review process were found.

Current Issues With the USDE

- **Finding:** OPE does not have adequate controls over the institutional information that accrediting agencies use as evidence to demonstrate that they have appropriate accreditation standards and effective mechanisms for evaluating compliance with those standards.

Current Issues With the USDE

- **Finding:** OPE does not have written policies and procedures to guide its analysts through the review of accrediting agencies' recognition petitions, which can and has led to inconsistencies across accrediting agency reviews and among OPE analysts.

Current Issues With the USDE

- **Recommendation:** Require the OPE Accreditation Group to use risk-based procedures and readily available information to identify which and how many institutions each petitioning accrediting agency must use to demonstrate that it consistently applies and enforces its accreditation standards and otherwise complies with Federal recognition criteria.

Current Issues With the USDE

- **Recommendation:** Require the OPE Accreditation Group to adopt written policies and procedures for reviewing accrediting agency petitions for recognition.
- **Recommendation:** Require the OPE Accreditation Group to adopt a risk-based methodology, using readily available information, to identify high-risk accrediting agencies and prioritize its oversight of those agencies during the recognition period.

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