

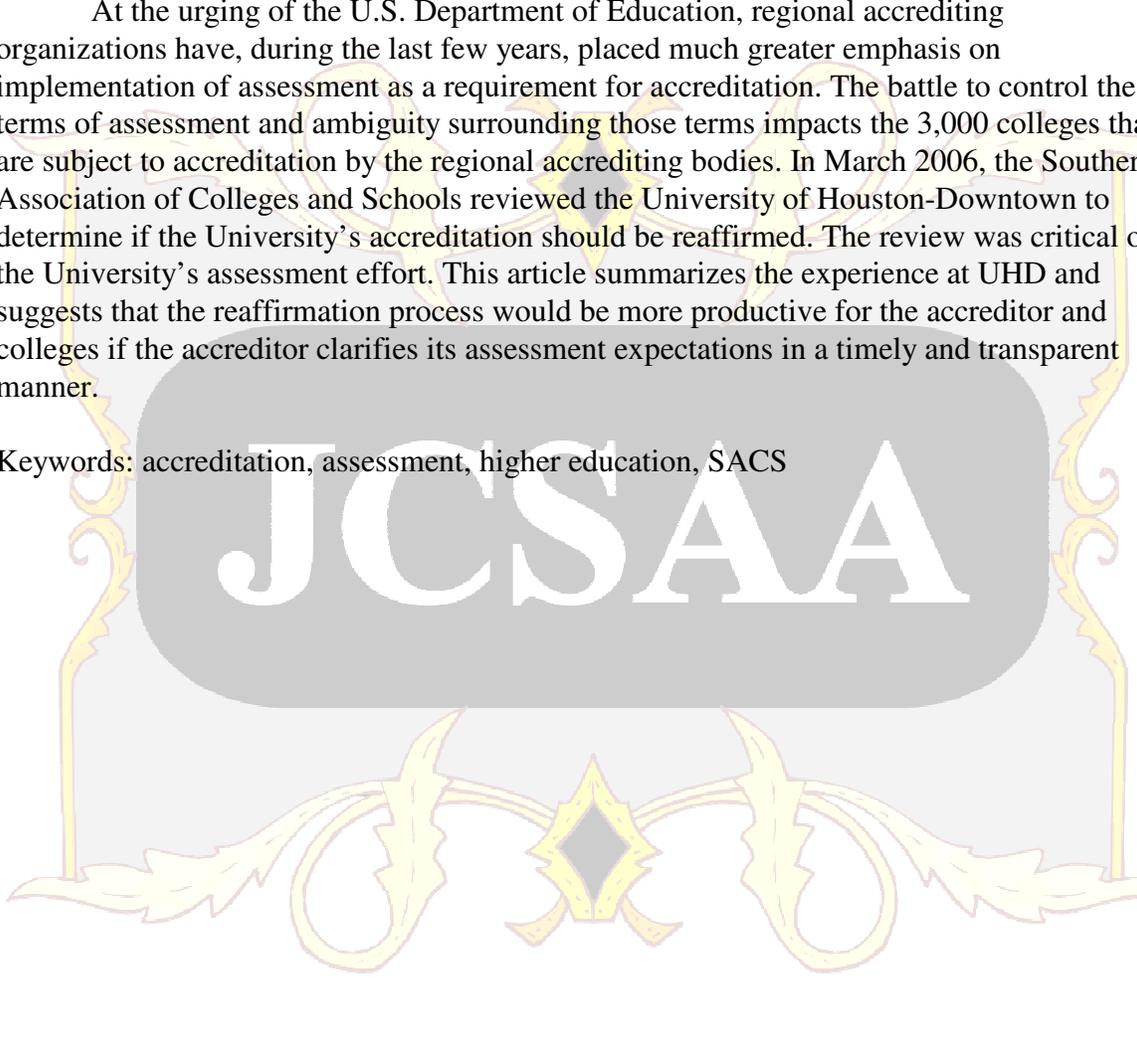
Case study of accreditation reaffirmation with emphasis on assessment-related ambiguities

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ABSTRACT

At the urging of the U.S. Department of Education, regional accrediting organizations have, during the last few years, placed much greater emphasis on implementation of assessment as a requirement for accreditation. The battle to control the terms of assessment and ambiguity surrounding those terms impacts the 3,000 colleges that are subject to accreditation by the regional accrediting bodies. In March 2006, the Southern Association of Colleges and Schools reviewed the University of Houston-Downtown to determine if the University's accreditation should be reaffirmed. The review was critical of the University's assessment effort. This article summarizes the experience at UHD and suggests that the reaffirmation process would be more productive for the accreditor and colleges if the accreditor clarifies its assessment expectations in a timely and transparent manner.

Keywords: accreditation, assessment, higher education, SACS

A large, semi-transparent watermark of the JCSAA logo is centered on the page. The logo consists of the letters 'JCSAA' in a bold, serif font, set within a dark grey rounded rectangle. This rectangle is framed by an ornate, yellow-gold decorative border with intricate scrollwork and floral patterns. The background behind the logo is a light grey gradient.

JCSAA

INTRODUCTION

The primary audience for this article is stakeholders in the accreditation of U.S. colleges and universities, especially where accreditation reaffirmation by a regional accreditation agency is upcoming and where the commitment to assessment and development of sound assessment practices requires additional attention.

This article provides background information about the ongoing power struggle to define the measures of effectiveness of higher education and the current ambiguities that have resulted from the struggle, describes the impact of those ambiguities on the most recent accreditation reaffirmation experience at University of Houston-Downtown (UHD), and argues that written guidance from the regional accreditors is needed to reduce assessment-related ambiguities.

BACKGROUND

Assessment of higher education is an ongoing, politically charged, and contentious issue. The combatants include the United States Department of Education (DOE), Congress, accreditors, and colleges. The DOE, through the National Advisory Committee on Institutional Quality and Integrity (NACIQI), has a stranglehold on the accrediting agencies and has conscripted them to serve, in part, as proxies for the enforcement of DOE-promulgated assessment practices when conducting accreditation reviews of institutions of higher education.

Accreditation agencies are nongovernmental entities, but the DOE can exert considerable influence on them because accreditors must meet the DOE criteria for measuring the quality of an institution. NACIQI periodically reviews all federally recognized accrediting agencies on behalf of the DOE to determine if the accrediting agencies' standards meet the DOE criteria.

Accreditation started as and remains a voluntary process; but, in 1965 the federal government set accreditation by a DOE-recognized accrediting agency as a prerequisite for students' eligibility for federally guaranteed loans. Because these loans are an essential source of income for most colleges, accreditation became a requirement for survival of many colleges.

The recent emphasis on assessment of outcomes as a component of accreditation has roots in the 1992 reauthorization of the Higher Education Act (HEA). The HEA included a new measure: "Success with respect to student achievement."

More than a decade later, President George W. Bush, shortly after taking office, pushed for more accountability in education through the No Child Behind Act and changes to the 2004 renewal of the Higher Education Act. Accrediting agencies and colleges opposed the use of standardized measures to increase educational accountability, arguing that such measures are ineffective tools for meaningful evaluation of diverse and complex institutions. Farrell (2003) reported that accreditors expressed their opposition to Congress through their umbrella lobbying organization, the Council for Higher Education Accreditation (p. 25).

Bush appointee, Secretary Margaret Spellings, shortly after assuming leadership of the DOE in 2005, initiated the Commission on the Future of Higher Education. Bollag (2006) reported that in March 2006 the Commission

. . . released a discussion paper that proposed dismantling the current accreditation system. The paper, which was vehemently attacked by accreditors and some higher-education leaders, called for legislation to establish a national accreditation body to replace the six regional accreditors that oversee 3,000 institutions.

The final version of the Commission's 2006 report backed off from the dismantling position, but called for the accrediting agencies to make performance outcomes the core of their assessment (p. 42).

Accreditors objected to this recommendation of the Commission. During her tenure as president of the New England Association of Schools and Colleges, Barbara Brittingham (2008) expressed misgivings about the proposals and methods of the DOE under Secretary Spellings: "Those proposals and the attempt to enforce them through new regulations have been widely viewed as unacceptable by the higher education community." Furthermore, "Regional accreditation is fundamentally sound and should not be harmed by abrupt regulatory changes" (p. 32).

Spellings stocked NACIQI with administration appointees who demanded that accreditors require colleges use more measurements based on outcomes. In 2007, Congress became concerned with NACIQI's behavior and later passed legislation that curtailed the secretary's authority to appoint all the members of the panel as a provision of the reauthorization of the Higher Education Act. Basken (2007) observed that lawmakers from both houses and both parties, led by Tennessee Senator Lamar Alexander, argued that Congress, not NACIQI, should set the guidelines for how colleges measure student achievement. The reauthorization gave the House and Senate the right to select 12 of the NACIQI review panel's 18 members. The Senate included a provision in its version of the reauthorization bill that gave "colleges primary responsibility to develop the measures of learning that their accreditors would use to judge them" (p. 1).

Field (2007) reported that the House initially included a similar provision in its version of the bill, but with the secretive, backroom support of accreditors, and over fierce opposition from college lobbyists, but the provision was later struck from the House version through an amendment by New Jersey Representative Robert Andrews. Becky Timmons, assistant vice president for government relations for the American Council on Education, a college lobbying entity, summed up legislative maneuvering by the accreditors:

Accreditors ambushed colleges and universities with the Andrews amendment, which unravels months of hard work to get language into the Higher Education Act acknowledging the right of institutions to establish their own student-learning outcome measures (p. 1).

The politically charged, and contentious battle for control over the terms of assessment as a component of accreditation has led to publicly expressed resentment of NACIQI's tactics and uncertainty about what NACIQI will eventually demand of accreditors. Basken reported that Steven D. Crow, who, at the time, was the executive director of the North Central Association of Colleges and Schools' Higher Learning Commission commented on Congressional concern about NACIQI running roughshod over the regional accreditors, "I'm not sure they [NACIQI] care what Congress is saying." Crow added, "NACIQI has become a spectator sport because you never know what may happen at any given NACIQI meeting, and you never know what may be the new agenda of the day."

NACIQI has been critical of the accreditors. In June 2006, a NACIQI review of SACS, cited the need ". . . to more clearly define what SACS itself considers acceptable levels of institutional success with respect to student achievement" (p. 1).

What are the implications for colleges seeking reaffirmation of accreditation? The recent experience of UHD may be illustrative of the experience of many institutions.

UHD

Until the most recent reaffirmation visit from SACS, UHD had a history of uneventful accreditation and reaffirmation experience that extends back to its founding in 1974.

Unlike previous visits, after its March 7-9, 2006, on-site review, SACS emphasized the need for evidence that the assessment cycle of data collection, evaluation, and modification to improve learning outcomes was consistently completed for all programs throughout the university. In a letter dated January 9, 2007, SACS made several recommendations, including the following: "The institution should provide evidence that student learning outcomes are being assessed for each of the educational programs and that the assessment data are used to enhance the quality of the programs" (B. Wheelan, personal communication).

During September 2007, UHD responded to SACS with its First Monitoring Report. The report asserted that UHD was in full compliance with the requirements of SACS, concluding:

. . . the University believes that the combination of evidence from classroom assessments, department program assessments, university-wide proficiency exams, and nationally-normed evaluation instruments provide evidence that its graduates have attained the college-level competencies identified in its general education core. Further, the University now has a systematic plan in place to ensure that the various components of the general education will continue to be assessed on a regular and ongoing basis (Fairbanks, personal communication, p. 12).

SACS was not satisfied. On January 9, 2008, SACS responded to the First Monitoring Report with a letter to then UHD President Dr. Max Castillo, as follows, "The institution is requested to submit a Second Monitoring Report due September 5, 2008." The report

. . . should include clear evidence that the university has defined student learning outcomes for each educational program, documentation showing that the student learning outcomes for each educational programs are being assessed through both direct and indirect methods, and evidence that the results of assessment data are being used to enhance the quality of the educational programs.

A further report is requested and should (1) include evidence that the university has defined the competencies students should attain in the general education core and (2) provide documentation that those competencies are assessed and that graduates have attained those competencies

Please note that with the submission of this report, your institution will have submitted monitoring reports for a period of two years, concluding in December 2008. Federal regulations and Commission policy stipulate that if

an institution does not demonstrate compliance with all the standards and requirements of the Principles of Accreditation within two years following the Commission's initial action on the institution, representatives from the institution may be required to appear for a meeting on the record before the Commission, or one of its standing committees, to answer questions as to why the institution should not be removed from membership (Wheelan, personal communication, p. 2).

Not only was SACS not satisfied, if UHD failed to satisfy SACS in the next 12 months, it's faced the possible loss of accreditation. UHD students are heavily dependent on financial aid. Any interruption of their ability to get financial aid not only disrupts their education, but also disrupts the operation of the University.

Ambiguity

Former UHD President Castillo, who at the time had nearly three decades of successful service as a college president and had participated in accreditation assessments of other colleges, sought clarification from SACS about what appeared to him to be a new interpretation of the SACS accreditation Principles, and failure of SACS to clarify how such changes could impact institutional accreditation reaffirmation.

The March 11, 2008, response from SACS President Wheelan failed to identify and clarify the real change, which seems to have been the accreditor's new interpretation of the guidelines in response to NACIQI pressure.

If you read carefully what the Commission requested of your institution in December 2007 and as represented in my letter of January 9, 2008, you will note that there is very little change in the follow up request from the initial recommendation of the affirmation committee relating to student learning assessment and the Commission's December review in 2006 (p.1).

Regarding the assumption that Commission staff notifies institutions of changes to the Principles, it is the responsibility of an institution to be current in the changes to the standards that are posted on the Commission's Web page after we have informed you of such. (p. 2).

At that time, and to this day, the Principles of Accreditation lacks important information about the accrediting body's requirements for institutional effectiveness. The Principles are limited to two concise statements.

Section 2.5 states

The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation processes that incorporate a systematic review of programs and services that (a) results in continuing improvement, and (b) demonstrates that the institution is effectively accomplishing its mission (p. 15).

Section 3.3.1 states

The institution identifies expected outcomes for its educational programs and its administrative and educational support services; assesses

whether it achieves these outcomes; and provides evidence of improvement based on analysis of those results (p. 22).

SACS augments the Principles with guidelines, which it describes as advisory statements “. . . designed to assist institutions in fulfilling accreditation requirements. As such, guidelines describe recommended educational practices for documenting requirements” and provide “. . . examples of commonly accepted practices that constitute compliance with the standard” (p. 37). At the time, three guidelines were provided, one for advertising, student recruitment and representation of accredited status, the second for contractual relationships with non-regionally accredited entities, and the third for travel and committee visits. There were, and still are, no guidelines concerning institutional effectiveness, either in the Principles or on the SACS website.

SACS also provides “good practices,” which it describes as “. . . commonly-accepted practices within the higher education community which enhance institutional quality.” At the time, one good practice was provided, which concerned “electronically offered degree and certificate programs” (<http://sacscoc.org/policies.asp>). In 2010, a second good practice about developing policy and procedures documents was added. There were, and still are, no good practices concerning assessment! The absence of such information seems to support the validity of the afore mentioned NACIQI contention that SACS does not explain what it considers “. . . acceptable levels of institutional success with respect to student achievement.” Incorporating in the Principles or posting to the SACS website assessment information, such as that contained in the January 9, 2008 letter from SACS President Wheelan regarding the need for direct and indirect measures, would be a useful start.

The need for a greater understanding about SACS expectations, especially regarding assessment, led UHD to seek the help of an assessment consultant. During the first weeks of 2009, the UHD upper-level academic administrators finalized a plan of action. The faculty senate met to both chastise these upper-level administrators for their failure to avoid the criticism from SACS and to express the willingness and availability of the faculty to do whatever was necessary to help bring the situation to a satisfactory conclusion.

Crisis Mentality

The jeopardy to accreditation contributed to a crisis mentality, which turned out to be a mixed blessing. On one hand, it provided the significant advantages of a focused approach and highly motivated participants; on the other hand, it limited the breadth of stakeholder participation and depth of widespread deliberation among faculty about the range and desirability of various assessment options.

The immediate strategy of the UHD assessment effort was clear: satisfy SACS. J. Allen (2004) notes there is a tendency to formulate assessment strategies that try to do too much. She recommends a streamlined approach (p. 98). The approach at UHD was nothing, if not streamlined. So much so that the education and thoughtful deliberation of stakeholders was necessarily truncated. It was not the fear of the anarchy of participation (Latour 1999), but rather the fear of failure, that limited the implementation of participatory assessment, as described by Salvo and Ren (2007). There was little time for democratic deliberations or academic arguments. In their place was a succinct strategy and a drop-dead date.

Banta (2004) editorializes, “. . . stakeholders are much more likely to become engaged if they can perceive assessment as an integral part of a process they value such as curriculum development, peer review, or personal scholarship” (p. 3). At UHD, stakeholders became engaged in assessment because they feared the consequences of failing to satisfy SACS. Motivation among administrators, faculty, and staff was high.

The deans led the efforts within their colleges to develop the documentation required for SACS. Each department recruited one or more individuals to lead the effort at the program level. The deans tasked the department-level liaisons with the development of LOs and rubrics, and the identification of indirect measures with which to assess the achievement of the LOs. Rubrics were a good choice for measuring the diverse LOs to be identified by the departments. As M. Allen (2004) states, “Rubrics can be used to classify any product or behavior, such as essays, research reports, portfolios, works of art, recitals, oral presentations, performances, and group activities” (p. 138).

Results

The jeopardy to the University’s accreditation was unsettling, the topic of much speculation, and some finger pointing. The effort to clarify, implement, and document the level of assessment required to satisfy SACS was urgent, intense, and far-reaching. SACS reaffirmed the accreditation of UHD at the 11th hour. One might be tempted to conclude that “all’s well that ends well,” but the effort required the unnecessary expenditure of scarce resources, both on the part of the institution and SACS, which might have been avoided had SACS clarified its expectations in a more timely, clear and transparent manner.

The effort at UHD to institutionalize meaningful assessment continues. The institution’s mission statement was rewritten. A director of assessment was hired. Explicit LOs for programs across the University now exist, as do various means for measuring the achievement of the LOs, and, as needed, making modifications to improve achievement. Many members of the faculty and administration are now engaged increasing their knowledge and application of assessment principles and practices. There seems to be a widespread and growing understanding of the nature and growing importance of assessment, which is resulting in an increased receptivity to participation in, and support of, various assessment activities, for example, the English Department Rank and Tenure Committee recently proposed adding the tenure requirement of “. . . assessing success in meeting learning outcomes and adjusting teaching practice as assessment indicates is advisable” (p. 1). It is too soon to identify the impact of intensified assessment efforts on the achievement of learning outcomes, but at this time, it appears that significant momentum is building for the creation of a culture of assessment at UHD.

The urgency of the situation intruded on the process at UHD, and may have provided some justification for ignoring principles of good practice for assessing higher education, as identified by Astin et al., and published through the American Association of Higher Education. At UHD, it seemed that

- Conceptualization was a group effort, albeit a very small group, which expedited the conceptualization process.

- Participation by external stakeholders, such as actual and potential benefactors, was restricted, possibly to protect both ongoing development efforts and the University's reputation.
- Long-term sustainability of the assessment effort was uncertain. There was reason to wonder what would happen with assessment if the immediate threat could be averted.

The net effect of the urgency was to accelerate the development of a successful response to the immediate threat and institutionalization of practices intended to minimize the likelihood of the recurrence of a tumultuous accreditation event.

CONCLUSION

DOE pressure has compelled the regional accrediting bodies to put greater emphasis on assessment. In the case of colleges subject to accreditation by SACS, and possibly of colleges subject to accreditation by one or more of the other five regional accreditors, there is a need for timely and explicit statements from the accreditor that clarify its changing expectations, especially regarding the sufficiency of institutional assessment efforts. Failure of an accreditor to proactively clarify and publicize its expectations, especially when expectations change, can waste scarce resources of the institutions subject to review by the accreditor, which should be addressed by the accreditor, rather than leaving institutions to intuit expectations based on shared experiences, conference participation, hiring consultants, and other activities. One channel for publishing such statements is the accreditor's website. Incorporating "push" technology, such as an RSS feed on the SACS website, would allow subscribing colleges to automatically receive notice of updates to the site.

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