Accreditation

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Prepared for the American Enterprise Institute Conference, "Increasing Accountability in American Higher Education"
November 17, 2009

The collected papers for this conference can be found at www.aei.org/event/100134.

Southeastern University had the saddest bookstore you'll ever see.

It was more of a walk-in closet, really, a tiny space off the lobby of the university's one and only building. When I walked through the bookstore doorway in May 2009, the shelves were half-bare, haphazardly stocked with Kleenex and sundries, introductory business textbooks, and, unaccountably, two brand-new copies of William T. Vollmann's sprawling 2005 novel, *Europe Central.*

I left without buying anything and wandered down a nearby hallway, which was filled with the kind of notices and advertisements (Roommate needed-- no smokers or pets!) found on college walls everywhere. But on closer inspection, some of the notices seemed strange. "Listing of Classes Without an Instructor," one said, followed by a lengthy roster of courses like "Principles of Accounting" and "Health Services Information Systems." Oddly, it didn't suggest that the classes had been *cancelled* due to the lack of someone to teach them. It was more, "Hey, FYI."

After further wandering, I was drawn back to the closet-cum-bookstore. There was a small stack of T-shirts in one corner, along with hats, bags and paperweights, all bearing the university's official seal. "Chartered by the Congress of the United States" the seal proclaimed, in circumnavigational text, along with a large-font bid for aged-based gravitas: "1879." I bought a paperweight—$1.99, on sale—and dropped it my bag before walking across the lobby to a kiosk under a sign that said "Admissions."

"I'm interested in university course offerings," I said to the woman behind the counter. "Do you have a catalogue?"

"I'm not allowed to give out that information," she replied.

"But the sign says 'Admissions.' "

"I know. But we're not allowed to give it out. Everything's on hold right now. Because of the, you know, the situation."

There was nothing left to see. So I walked back out through lobby's front doors, onto the sidewalk on 6th Street in southwest Washington, DC. The university—all of it—sat before me on a small corner lot protected by barbed wire in an elementary school-sized two-story building of unfortunate concrete-based 1970s architectural vintage. No students were visible. If not for the sign out front, passers-by would have no reason to believe the structure contained a university of any kind.

The day was a long time coming. Small, poor, and non-selective, Southeastern took a turn for the worse over the last five years, graduating only a small fraction of undergraduates while hemorrhaging students, money, and staff. For decades before, the university had been mired in obscurity, mediocrity, cronyism, and intermittent corruption.

Yet during all that time Southeastern enjoyed the goldest of gold approval seals: "regional" accreditation, the very same imprimatur of quality granted to Ivy League univesities including Princeton, Columbia, Penn and Cornell, along with world-famous research institutions like Johns Hopkins University in Baltimore and Georgetown University, which sits in wealth and splendor above the Potomac river just a few miles away.

In the story of how Southeastern University gained that status—and ultimately lost it—much can be learned about the principal means of holding American colleges and universities accountable: how the accreditation process works, how it has failed, and how it must be transformed if the nation seriously aspires to provide all college students with a great education at an affordable price.

History

Southeastern is accredited under the umbrella of the Middle States Association of Colleges and Schools, which was founded in 1887 by a small band of Pennsylvania college officials to "seek at the hands of the present Legislature the passage of a new act…to render impossible the further taxation of any property of institutions of learning."[1] This attitude toward

paying taxes—and government in general—is among the many aspects of American higher education that have changed little throughout the centuries.

After a few decades, Middle States felt the need to be more specific about what, exactly, it meant by "college." In 1917 it formed a "Committee on Standardization of Colleges." After due deliberation, the committee came back in 1919 to recommend the creation of a "Commission on Higher Education." The commission would create standards defining what a college should be, e.g. "an institution must have at least eight professors," a half-million dollar endowment, and certain required courses in the liberal arts. Teachers colleges, junior colleges and technical institutions would not be considered.

Colleges immediately understood the importance of the designation. As Ewald B. Nyquist, chairman of Middle States in the 1950s, later wrote, "the most turgid, emotional and often irrelevant prayers for relief were made by presidents of institutions scheduled to be left off the initial accredited list." After much debate, the original roster of 59 institutions was released in 1921. The Middle States Commission would go on to become one of the six powerful accreditors that eventually carved up the United States into geographically defined territories, or "regions," giving them the deceptively modest designation of "regional accreditor."[2] In most things (including other aspects of higher education), regional is synonymous with provincial and second-rate. In accreditation, the regionals reign. Today, Middle States has jurisdiction over Delaware, Maryland, New Jersey, New York, Pennsylvania, and the District of Columbia.

From the beginning, Middle States adjusted its approach to accreditation to accommodate the demands of the times. The growing diversity of higher education institutions quickly became an issue. While the Ivy League has not grown since 1921, many other types of institutions have come into being since then, or evolved radically from earlier forms. The higher education system as whole has exploded in size to accommodate a vastly larger and varied population of college students. In 1926, Middle States agreed to accredit engineering schools. The first junior colleges were accredited in 1932 and teachers colleges were added in 1937. To make room for these very

different institutions, Middle States gradually generalized its criteria, moving from fixed quantitative measures like "at least eight professors" to qualitative evaluations of standards broad enough to accommodate Columbia University, TK, and everything in between.

Middle States also quickly ran up against the limits of its authority as a voluntary, non-governmental organization that relied on the members it regulated for financial support. Due to various scandals and outrages associated with intercollegiate athletics, the Commission resolved in 1933 to ban members from offering athletic scholarships. Two years later, it mailed out a questionnaire asking members if they were in compliance. They all dutifully replied in the affirmative. "Upon reflection," wrote Nyquist, "it seems probable that several institutions were not in harmony with the Commission's action and their uniform replies indicated a canting simulation of goodness." Powerless in the face of widespread non-compliance, the Commission abandoned the standard. Chairman Wilson H. Farrand concluded the matter by saying:

> "…although in the face of manifest opposition we are unable to enforce the rule, the Commission takes this opportunity to reiterate its firm conviction that no college that grants athletic scholarships is worthy of a place on our accredited list."

Today, athletic scholarships and related outrages remain widespread in the middle states, as elsewhere.

The Commission was a creature of the institutions that formed it, and thus adopted a fundamentally collegial approach to quality control. The association was a club, a guild, and difficult conversations would remain safely within shared walls. "To divulge the name of an institution which is just not quite good enough or which is in trouble," wrote Nyquist, "is a form of pitiless publicity probably never intended in 1921 and never practiced since."

Middle State began with an inspectorate model of accreditation, sending staff to visit campuses and ensure that everything was up to snuff. Institutions chafed at the intrusion. One such dean noted "the well-known principle that an expert is an ordinary person who is away from home. These outsiders are brought in because of their objectivity, objectivity being the capacity for discovering faults abroad which you cannot recognize at home. To be a good educational

surveyor…you must have a sharp eye for foreign motes, but a dull one for domestic beams." By the 1950s, Middle States had switched to process of institutional self-study. Combined with the abandonment of quantitative standards in the face of institutional diversity, this meant that institutions were being asked to evaluate themselves against standards of their own choosing.

As time wore one, state and federal governments grew steadily more involved in higher education. This presented a major challenge for accreditors—the associations were in many ways specifically constituted to prevent such encroachment. As one of the original Middle States commissioners said, "Fear of government in educational affairs and yet a realization that there must be some means of educational control and guidance produced the accrediting agency." The accreditors would likely have preferred to maintain the collegial, guild-like atmosphere of accreditation indefinitely. But they were powerless in the face of tectonic historical trends.

In the 1950 and 1960s, federal funds began pouring into higher education to fund various enterprises, including the education of veterans and the scientific research needed to wage the Cold War. In 1952, Congress passed the Veteran's Readjustment Assistance Act, a new version of the iconic G.I. Bill. It required the U.S. Commissioner of Education to produce a roster of officially recognized accreditors. The federal Higher Education Act of 1965 expanded these responsibilities. That same year, the National Vocational Student Loan Act opened up a whole new class of institutions to federal funds, including trade schools, technical institutes, and community colleges.

By the 1970s, federal lawmakers had established the system of student-centered, grant- and loan-based financial aid that remains in place today. Rather than create a new system of federal evaluation and oversight, Congress tied Pell grants and other form of aid to accreditation. Students could give their federal dollars to accredited colleges and no other. For institutions, accreditation was now more than just an issue of status—large amounts of money were at stake.

Meanwhile, college-going among high school graduates went from being the exception to the rule. Advances in transportation and communication created national (and then international)

higher education markets. An abundance of media and growing societal wealth produced a thriving consumer culture and helped make the most famous colleges objects of striving middle class aspiration. Both consumers and governments thirsted for information about higher education.

All of these changes produced a series of tensions and outright contradictions for accreditors like Middle States.

The Association may have been founded on antagonism toward paying money into the public treasury, but its members had few qualms about taking public money *out*. So organizations created to repel government interference became increasingly enmeshed with the federal bureaucracy, becoming de facto public agents subject to ongoing oversight and review.

Public officials wanted accreditors to enforce rigorous standards of quality and judge colleges at arms length. But the accreditors existed at the pleasure of their members, and—as the disastrous foray into intercollegiate athletics showed—could only push the people who paid the bills so far. Those people also didn't want the bills to get very large. The massive increase in the number of institutions seeking accreditation created a commensurate need for more staff at the regional accreditors. Rather than ask for more money to pay for more full-time, independent inspectors, the accreditors began relying heavily on a force of volunteers from other colleges to conduct site visits and help render judgment. It was an inexpensive approach, but it opened the door for log-rolling (you give my institution a pass and I'll return the favor) as well as the inevitable dull edges of collegiality.

The public demand for consumer information was a challenge in any case—colleges and universities, particularly in the modern age, are inordinately complex, multidimensional institutions. And whatever ability accreditors might have had to meet that demand was stymied by the inherent secrecy of the guild, an aversion to "pitiless publicity" in all its forms.

All of these problems and contradictions were in place by 1977, when Middle States first granted accreditation to Southeastern University. In large part, they explain the sorry history of that relationship over the next 32 years.

Difficulty from the Beginning

Signs of trouble weren't long in coming—in 1981, the university fired its comptroller after an audit found she had inappropriately directed over $100,000 in university funds to a local culinary school, of which the president of Southeastern was a trustee.[3]

Founded by the YMCA in 1879 and chartered by the United States Congress in 1937, Southeastern had for most of it history been an unaccredited trade school. Like hundreds of similar institutions, it saw the advantages of accessing the federal financial aid system that emerged in the late '60s and early '70s. But as a private institution, Southeastern had to charge higher tuition than nearby public colleges. Because most of the university's students come from modest socio-economic backgrounds, many had to borrow to pay their tuition bills. For a significant number of students, repaying those loans was a struggle. In 1982, the U.S. Department of Education put Southeastern on a list of sanctioned institutions, due to loan default rates exceeding 25 percent.

Southeastern's business manager was the next to go, fired in 1983 after he and his wife were accused, as the *Washington Post* described, of "defraud[ing] the university of more than $500,000 through several local companies in which they were secretly involved."[4] The business manager's lawyer loudly proclaimed his client a scapegoat for "monumental management and accounting problems" inherited from previous university leaders. The manager pled guilty two years later, detailing how he had paid students $4,000 a month for janitorial services, charged the university $13,300 a month, and pocketed the difference.

Meanwhile, instead of fixing its student loan problems, the university let them get worse—by 1987 the default rate had ballooned to 42 percent. In 1989 the U.S. Department of

Education again cut the university off from federal loan funds. Southeastern continued to decline throughout the early 1990s, with enrollment dropping from 1,800 to barely 500. The U.S. Department of Education threatened it with a $3.6 million fine for failing to properly account for federal financial aid dollars.

Then, in 1996, the university hired DC city councilwoman Charlene Drew Jarvis as president. A Ph.D neuropsychologist, Jarvis was the daughter of Dr. Charles Drew, the famed African-American doctor and blood bank pioneer. She was also a veteran of several failed mayoral campaigns who was forced to pay the city thousands of dollars in fines due to financial impropriety among her campaign staff.

The presidency eventually became a political liability for Jarvis—critics noted that her $110,000 presidential salary came on top of her $80,605 council salary, and questioned how she could adequately perform both jobs at once. In 2000 she lost her council seat to a 29-year old political upstart named Adrian Fenty—now the popular mayor of Washington, DC. But Jarvis's leadership brought Southeastern temporarily back from the brink. She negotiated the government fine down to $500,000 and aggressively recruited new students. For a few years, the university seemed to be on track.

Throughout all of these travails, Southeastern remained a regionally-accredited institution, eligible to grant credits and degrees and accept public funds.

Middle States was not, however, indifferent to the university's many troubles. Almost as soon as it granted Southeastern accreditation, it began threatening to take it away. In fact, the university enjoyed unqualified accreditation for only 14 of the 32 years from 1977 to 2009. The other 18 were spent in various states of probation, sanction, conditionality and general opprobrium, including a near-death experience in the early 1990s.

The first years of Jarvis' presidency were fairly positive, and in June 2001 Middle States voted to reaffirm accreditation, albeit with a request for an unusually swift (for accreditation) follow-up report in 2003. Then Washington, DC was hit by the terrorist attacks of September 11th.

The federal government responded with an immediate clamp-down on foreign student visas. Students from overseas (particularly Asia) had long been an important part of Southeastern's student body. It had also enjoyed steady enrollment in computer science courses. The one-two punch of 9/11 and the Dot-com bust put a serious dent in enrollment, and the university had little financial cushion to spare.

In response, Southeastern began to aggressively move people into online courses, which, if implemented properly, can be a valuable option for the adult working students who comprise most of the university's enrollees. But soon the *majority* of all enrollments were online, without the required permission from the U.S. Department of Education or Middle States. When the Department found out, it ruled that the university had been ineligible to receive the federal grants and loans students had used to pay for the online courses. It levied a multi-million dollar fine.

Southeastern's board did little to prevent these problems or help the university to firmer ground. "They were her friends," one university employee told me, referring to President Jarvis. "They were there to give or get money. There was little governing involved."

After receiving the 2003 follow-up report, Middle States demanded evidence that Southeastern had a plan to address its declining enrollment and deteriorating balance sheet. In 2005, the accreditor issued an official warning that Southeastern's accreditation was in jeopardy—one of the methods accreditors have developed to signal displeasure without officially revoking accreditation and thus administering the "death penalty" of removing access to federal funds. Middle States demanded more enrollment and financial data along with more information about student dropout and loan default rates and "clarification of the institution's mission." In March 2006, it issued another official warning. Southeastern seemed headed for oblivion.

Then, on June 22, 2006, Middle States took the warning away and "reaffirmed accreditation." What changed in the intervening months isn't clear, particularly since Middle States continued to require frequent data reports and plans. Four months later, the accreditor

approved an *expansion* of the university's scope, four new certificate programs in Allied Health that would be offered in southeast DC.

The respite didn't last long. In June 2007 the Commission sent another long list of demands for information and plans. In November of that year, it put Southeastern back on "warning" status. Unsatisfied with the response, it moved two months later to put the university on "probation," which is worse than "warning," because of:

> "lack of evidence that the institution is currently in compliance with Standard 1 (Mission and Goals), Standard 2 (Planning, Resource Allocation, and Institutional Renewal), Standard 6 (Integrity), Standard 7 (Institutional Assessment), and Standard 13 (Related Educational Offerings) as well as Standard 3 (Institutional Resources) and Standard 8 (Student Admissions and Retention)."

It also had deep concerns about:

> *"Standard 4 (Leadership and Governance)…Standard 5 (Administration)…Standard 10 (Faculty)…Standard 11 (Academic Rigor)…and Standard 14 (Assessment of Student Learning)."*

In other words, Southeastern was broke, depopulated, unorganized, and dishonest, with students who were unlikely to graduate or learn much along the way. Of the 14 Middle States standards, Southeastern was failing twelve.

In March 2008 the Commission reaffirmed that Standards 1,2,3,6,7,8, and 13 were deficient. Three months later, in June, it sent a letter requiring Southeastern to "show cause, by November 1, 2008, as to why its accreditation should not be removed"—"show cause" being worse than "probation" which is worse than "warning."

Southeastern tried to put its best face on the situation. It continued to enroll students, and its Web site prominently featured a picture of President Jarvis in full academic regalia, clasping hands with then-Senator Barack Obama. "Is it business as usual at Southeastern?" the Web site asked, rhetorically. "Absolutely," it replied. "***Southeastern University remains accredited by the Middle States Commission on Higher Education."*** (italics and bold in original.) In a public statement, Jarvis said "We are inspired by this exploration of our potential." The university filed a new report on February 25, 2009.

But by that point the hole was too deep to escape. Barely a week later, on March 6, 2009, Middle States sent Jarvis a letter informing her that the commission had voted to remove Southeastern's accreditation, effective August 31, 2009. Most publicly-available accreditation-related documents are maddeningly vague or steeped in impenetrable jargon. This letter featured the kind of candor and clarity that one uses in discussing a broken relationship that is unlikely to be repaired. In justifying its decision, the Commission described a litany of findings of and failures, including:

- "The strategic plan has no timelines for implementation."
- "Most of the various plans documented in the response might be characterized as wish lists rather than plans."
- "The institution was spending more on fund-raising than it was receiving in gifts and donations."
- While Southeastern "pledged to establish a fund…to meet the immediate financial, operational, and human resources needs…no information was provided on what those needs are, how large the fund will be, or how or when it will be deployed."
- "While the institution copied the Commission on its November 3, 2008 response to a U.S. Department of Education review, the institution's failure to include any mention of this review in its November 1, 2008 report demonstrates a lack of integrity."
- "The team noticed seriously invalid student data presented with the institution's November 1, 2008 report."
- "The most recent six-year graduation rate for all first-time (full-time and part-time) baccalaureate students was 14%, with another 11% returning."
- "Southeastern University began the Fall 2008 quadmester with only six full-time faculty members for over 30 academic programs. Two of the full-time faculty members—the registrar and assessment coordinator—also had administrative responsibilities."
- "The response documented pass rates on six assessment exams administered by the [recently created, with Middles State approval] Center for Allied Health Education. Pass rates were 0% on three of the exams, 16% on one exam, 33% on one exam, and 40% on one exam."
- The team "found no evidence that students have knowledge, skills, and competencies consistent with institutional and appropriate higher education goals."
- "Adding to the uncertainties of Southeastern's present status and plans for the future is the complete absence in the February 25, 2009, report of any mention of Southeastern's incumbent president, Charlene Drew Jarvis, in the text or as a signatory."

The list of shortcomings and broken promises goes on for pages. It provides more than ample evidence for revoking accreditation. But it also raises the question of why such dismal performance was allowed to persist. Given the university's extended history of loan defaults, financial struggles, and scandal, it's fair to assume that a similar report could have been issued

years or even decades before. Why wait so long to pull the plug? Surprisingly, Middle States provided an entirely plausible answer at the end of the document:

> "Ever since Southeastern University's initial accreditation by the Middle States Commission on Higher Education in 1977, the Commission has recognized the University's mission of serving diverse and underserved student populations. It is largely as a consequence of this recognition that the Commission has been so forbearing in its actions to date regarding Southeastern University, spending significant time discussing the Commission's expectations, accepting an exceptional number of late and supplemental reports, and deferring accreditation decisions when institutional circumstances have changed. Despite these accommodations, Southeastern University's history with the Commission has been characterized by a pattern of Commission sanction and ineffective institutional response…The issues considered by the Commission at today's meeting have been cited as ongoing concerns in Commission actions over the past thirty years."

One might logically conclude that low-income, traditionally under-served students are *most* in need of a high-quality university education and the protections of external regulatory bodies. Such students live at the margins of economic opportunity, often receive substandard K-12 schooling, and are most likely to drop out of college, even when they attend a non-terrible institution. They are also less likely to have access to the social networks and personal experience needed to evaluate institutional quality on their own.

Yet Middle States lowered its standards for Southeastern to near-subterranean levels precisely *because* the institution served vulnerable students. Rather than act with unusual haste to protect Southeastern undergraduates, it allowed the university to flail about in mediocrity and failure for three decades, leaving thousands of loan defaults, non-graduates, and students without the "knowledge, skills, and competencies" they needed in its wake.

One could argue that Southeastern is not representative of the entire Middle States membership, which is entirely true. But regional accreditation isn't a factor in the upper echelons of higher education, where institutions are far above minimum standards. Middle States may accredit half the Ivy League, but the only practical consequence of this is to give institutions like Southeastern what Ewald Nyquist described as "gilt by association." Accreditation only truly matters at the lowest margin. Southeastern exposed just how low those standards have sunk.

This outcome was not an aberration. It was the unavoidable consequence of the basic contradictions that have plagued the accreditation process for most of its history. If those contradictions are not resolved, more such failures will surely come.

Divergent Interests and Goals

Accreditation has been controversial for as long as it has existed. Some of the conflict has come from within the accreditation community itself, with regional accreditors vying for power with "specialized" accreditors that examine and approve specific schools or programs, e.g. law schools and departments of education. Colleges were already fed-up with the cost, hassle, and overlap of competing accreditors by the late 1940s. In 1949, the biggest national higher education groups formed the National Commission on Accreditation (NCA), in an attempt to bring order to the chaos of multiple accreditors and address, per Nyquist, "rising national concern over the abuses and evils of accrediting." It largely failed. Regional accreditors valued their independence and didn't want to cooperate with university presidents driving the NCA agenda. The regionals went on to form their own association, which evolved into the Federation of Regional Accrediting Commission on Higher Education (FRACHE).

Not long after the federal government gave regional accreditors the keys to the federal financial aid kingdom in the 1960s, policymakers began having second thoughts. In 1969, the Secretary of the Department of Health, Education and Welfare tasked Stanford University official Frank Newman with leading a Task Force on Higher Education. With funding from the Ford Foundation, the group worked for two years before presenting the first of what became known as the "Newman Reports" in 1971. It was, as one historian later wrote:

> "…a blistering attack on accreditation as it was then organized. The Newman Report proposed that the [U.S. Department] set its own institutional standards, which would then be administered by a national commission. It particularly favored disclosure and a separation of [financial aid] eligibility from accreditation. The Newman Report attacked the accrediting process, and thus the regional accrediting associations and commissions, as 'self-interested, without due process, and educationally conservative."[5]

FRACHE itself had sponsored critiques of accreditation—the 1970 "Puffer Report," led by Claude Puffer of the University of Buffalo, charged regional accreditors with being overly secretive and unconcerned with the public interest. It also called for a single national authority that would enforce uniform standards across regions, one that would resemble a "public utility commission with a responsibility for protecting the public [which] becomes less oriented toward the membership and more toward the public as a whole."[6]

Volleys from Washington, DC continued throughout the decade. As one Middle States historian wrote, "it was a rare Commission meeting in the 'seventies at which a major item on the agenda was not an extended discussion of how and in what ways the CHE should respond to some government action at the federal or state level." In 1975, legislation was introduced in Congress that tracked Newman's recommendations. Feeling the heat, accreditors worked to bring more order and national coordination to accreditation. That year, NCA and FRACHE merged into the Council on Postsecondary Accreditation (COPA).

In 1979, President Carter created the U.S. Department of Education, elevating the Secretary of Education to Cabinet rank and further strengthening the role of the federal government over education, including colleges and universities. The administration proposed severing the link between financial aid and accreditation link and handing that responsibility over to state governments. States were becoming increasingly aggressive actors in higher education, a consequence of the massive build-out of state university systems over the previous three decades. Accreditors were able to fend off these ideas and maintain control.

The 1980s were calmer—President Reagan was more interested in abolishing the U.S. Department of Education than expanding its control. But by the early 1990s accreditors were once again under attack. "Accreditation is now seen as part of the problem, not as part of the solution," said COPA president Kenneth Perrin.[7] In 1992, Congress reauthorized the federal Higher Education Act and included major reforms to accreditation. Power was transferred to 50 state-level State Postsecondary Review Entities (SPREs), which would be charged with

investigating institutions identified by the U.S. Department of Education as deficient on criteria such as high student loan default rates. Regional accreditors would lose authority while institutions could fall beneath the federal thumb.

The change was short-lived. The "Republican Revolution" of 1994 brought anti-government conservatives to power. The higher education establishment quickly made common cause with Newt Gingrich and abolished the SPREs.

Resistance to Change

By this time, COPA had been replaced by CHEA (the Council for Higher Education Accreditation), an organization created by higher education institutions to self-regulate accreditors in much the same way that accreditors were created to self-regulate higher education institutions. But the underlying flaws and contradictions of accreditation remained. The system provided little useful information to the public and didn't enforce high standards of learning or student success. It was just a matter of time before someone who was concerned about these problems and had the power to do something about it came along.

That time came in 2005, when U.S. Secretary of Education Margaret Spellings created a high-profile "Commission on the Future of Higher Education" to examine a range of issues including financial aid, student learning, and accountability. Accreditation quickly became a flash-point issue, particularly after Robert C. Dickeson, a former university president and senior advisor to several governors, wrote a white paper for the commission that included a stinging critique of the accreditation status quo.[8]

Accreditation is a "crazy-quilt of activities, processes, and structures," he wrote, one that is "fragmented, arcane, more historical than logical, and has outlived its usefulness." Standards for regional accreditation, Dickeson noted, are "based on an institution's self-study of the extent to which the institution feels it has met its own purposes." "Accreditation settles for minimal

standards," he said. "Nearly all institutions have it, very few lose it, and thus its meaning and legitimacy suffer."

"Any serious analysis of accreditation as it is currently practiced," concluded Dickeson, "results in the unmistakable conclusions that institutional purposes, rather than public purposes, predominate…This is not to suggest that institutions are ignorant of or antagonistic toward the public purposes of accreditation. But a system that is created, maintained, paid for and governed by institutions is necessarily more likely to look out for institutional interests." Dickeson called for the creation of a "National Accreditation Foundation" built as a public-private operating partnership that would take over the job of determining financial aid eligibility and provide more transparent results to the public at large.

The accreditation community objected strongly to these ideas. The proposed National Accreditation Foundation would "[attack] the unique combination of responsibility and freedom that has historically defined our colleges and universities," said Judith Eaton, president of CHEA. Early drafts of the commission's recommendations included a major overhaul of the accreditation system. But under pressure from the higher education establishment, the final report was watered down to include a finding of "significant shortcomings," including excessive secrecy, inattention to student learning outcomes, and hostility to innovation.

Secretary Spellings wasn't through with accreditation, however. She was determined to bring more transparency and information to consumers. Accreditation offered one of the few federal policy levers to accomplish this, because the Department of Education controlled the National Advisory Committee on Institutional Quality and Integrity (NACIQI), a body that essentially accredits accreditors in their role as gatekeepers to the federal financial aid system.

While NACIQI has occasionally taken a hard look at the lesser, "national accreditors" that have sprung up in recent decades to approve for-profit colleges, its attitude toward regional accreditors like Middle States has been distinctly hands-off. Then Spellings began appointing new members to NACIQI with a very different attitude. In December 2007, the New England

Association of Schools and Colleges came before the panel. New England was the first regional accreditor, established in 1885, and ever since has enjoyed the elevated status of accrediting Harvard, Yale, and other august institutions that pre-date the founding of the nation.

In the past, NACIQI recognition had been a mere formality. This time, one of the newly-appointed committee members took a different tack. Her name was Anne Neal, a former aide to National Endowment for the Humanities chair Lynne Cheney and now the president of the conservative American Council of Trustees and Alumni. Neal was no stranger to higher education in New England, having graduated magna cum laude from Harvard as an undergraduate before going to earn a J.D. from Harvard Law. She was not, however, willing to take the New England Commission's word that all its institutions were up to snuff. Reading the Commission's published standards aloud, Neal noted that individual institutions essentially had carte blanche to decide whether they were doing a good job. "What," she asked the New England Commission's director," do you view as acceptable with regard to an institution's success with regard to institutional achievement?"[9]

The director responded that institutional diversity made it impossible to set minimum requirements, but that every accredited institution "aims high." "None aims to offer an average or merely adequate education." She did not assert that every accredited college actually *achieves* its lofty aims, which would have been a difficult statement to defend, given that the New England Commission grants its mark of quality to institutions like the University of Bridgeport, which charges students almost $40,000 per year, has a four-year graduation rate of approximately 28 percent, and has been identified on multiple occasions as "America's Worst College."[10]

Neal pressed on. "How do you know that graduates of the institutions you accredit have achieved the standards of literacy to become informed citizens?" she asked.

"There is no accepted minimum standard," the director replied.

That was the issue in a nutshell. Secretary Spellings wanted regional accreditors to enforce some kind of minimum standards of quality, defined in terms of student success in learning and earning credentials. They wouldn't necessarily enforce the *same* standards for all institutions, just *some* standards. Accreditors and institutions objected, arguing, essentially, that if the U.S. Department of Education were to judge whether accreditors were enforcing standards, it could only do so by having its *own* standards lurking somewhere in the background, and that this in turn constituted a wholly unacceptable federal intrusion into the sacred autonomy of higher education. For organizations founded to ward off government control, there could be no greater peril.

As a result, the accreditors and college lobbyists took their cause directly to the United Congress, which in 2008 passed a law prohibiting the U.S. Department of Education from requiring colleges to measure how much students learn. It also abolished NACIQI and replaced it with a panel whose members would be primarily appointed by the United States Congress. The accreditors had once again lived to fight another day.

The More Things Change…

It is remarkable how constant the criticisms of accreditation have been. For decades, people have complained that the self-regulatory, guild-like process is ineffective when it comes to enforcing rigorous standards of quality and making hard decisions about low-performing institutions. They have observed that the combination of self-defined standards and self-directed evaluation allows institutions to be their own, inevitably forgiving, judges of success. They have decried the secrecy and opacity of the process, the reflexive aversion to "pitiless publicity," particularly in light of the growing need for public information. In 1970, Middle States President Taylor Jones laid out "Ten Theses" for accreditation. The ninth was, "The public has the right to know more than the accredited status of the institution." In 2009, when I asked Middle States for

historical accreditation reports about Southeastern University, I was told that I needed the university's permission. (It declined.)

And for much of that time, people have been proposing the same solutions: de-coupling accreditation from federal financial aid and moving beyond the archaic regional system. The fact that these reforms have been repulsed should not be taken as evidence against them. Instead, the history of institutions like Southeastern should be taken as evidence that the reformers were right all along.

The past half-century has been a time of great success for the upper-echelon colleges and universities for whom accreditation is all but irrelevant. They've become wealthy and famous beyond even their considerable ambitions. The predominantly well-off students who attend them have gone on to fame and fortune.

But the lower-echelon institutions—the only colleges and universities for whom accreditation really matters—have been far less successful. They've struggled with inadequate resources and a tidal wave of new students who emerged from high schools without basic skills in literacy and math. They have reported shockingly high failure rates. Hundreds of accredited institutions have graduation rates below 50 percent, and scores are much lower: 40 percent, 30 percent, 20 percent—even, as with Southeastern, lower still. The most recent survey of college student literacy found that less than half of all recent four-year *graduates*—that is, those among the 40, 30, and 20 percents—were proficient in prose literacy and the use of numbers.[11] Minority college graduates scored substantially worse than their white peers.

While the survey didn't break down the numbers by institution, it's a safe bet that illiterate college graduates aren't coming from Columbia, Johns Hopkins, or Georgetown. They're coming from Southeastern University and its ilk. Many years ago, the nation decided—or through lack of any centralized decision-making, simply allowed—that the best way to achieve mass higher education was to replicate the existing university model and ensure quality through the existing

accreditation system. Today's deeply inadequate graduation and literacy results suggest that this was a tremendous mistake.

Accrediting agencies themselves, it should be said, are by and large staffed with dedicated professionals who sincerely want the institutions they oversee to succeed and thrive. But accreditors are severely and deliberately under-resourced. As Ralph A. Wolff, president of the Western Association, has noted, the regionals accredit "nearly three thousand institutions serving over fourteen million students, with a combined professional staff of only 46 full-time members and 57 support staff."[12]

The fact that de-accreditation is the equivalent of a financial "death penalty" creates tremendous pressure for accreditors to forestall meaningful action until the last possible minute. As a result, accreditors often end up doing little more than stand next to the financial abyss and give collapsing institutions a small additional nudge on their way over the cliff. Even then, it can be difficult. In August 2009, Paul Quinn College successfully sued to temporarily block de-accreditation by the Southern Association recently, despite the Southern Association's finding of persistent deficiencies in financial stability, qualified staff, faculty credentials, governance, control of finances, and student achievement, among others.[13] A historically black institution, Paul Quinn has a 16 percent graduation rate for black students. For black men, the rate is seven percent. After the judge's ruling, Paul Quinn's president issued a statement declaring that "it means that our diplomas and credit hours mean exactly the same as any other accredited institution in America."[14]

The nation and its college students deserve a better higher education accountability system than this. We should start by distinguishing between public and institutional interests, and reforming accreditation accordingly.

What Can Be Done?

The public interest should be protected by a single regulatory body, a Commission on Higher Education (CHE), created by Congress and governed by an independent, bi-partisan group of commissioners. In an increasingly borderless world, it makes no sense to leave access to the huge and growing system of federal financial aid in the hands of six different regional organizations whose jurisdictions are a function of historical accident and who are financially and culturally beholden to the institutions they regulate.

Instead, the CHE would enforce a uniform set of standards. Financial viability would be an important factor and the commission's independent, professional staff would have the ability to audit and examine the financial status of institutions, much as the Securities and Exchange Commission can examine publicly-traded corporations. The CHE would work aggressively with law-enforcement agencies to clamp down on diploma mills and other forms of higher education fraud.

The CHE would be much more outcome-focused than are regional accreditors. It would work with higher education representatives to develop a suite of common student learning measures that institutions could, voluntarily, use to report their success. In making accreditation decisions, the CHE would put a premium on results, not process. It would provide a quicker path to accreditation for the most promising new higher education providers. (Currently, new providers are caught in a Catch-22: they have to successfully operate and enroll students for several years before receiving even provisional or "candidate" accreditation, but it can be very difficult to attract students to an unaccredited provider.) It would not limit accreditation, as the regionals currently do, to institutions that provide complete degree programs. Students are increasingly assembling credits and degrees from multiple sources. An organization that is able to successfully specialize in one of those areas—providing only math courses, for example—should not be discriminated against.

The CHE would also have a quicker process for *revoking* accreditation. Failure would not be tolerated for decades, as it was at Southeastern, and as it continues to be at other obscure and marginal institutions. The Commission would be far more aggressive about fulfilling F. Taylor Jones' ninth thesis and communicating accreditation results. It would not provide public information grudgingly—doing so would be part of its core mission. Results would be published, quickly and clearly, on a Web site specifically designed for students and parents choosing which college to attend.

The CHE would serve as a national clearinghouse for students transferring credits from one higher education provider to another. The present difficulty of credit transfer is a large and under-appreciated problem, and another failure of the current accreditation system. Despite the alleged quality assurance of regional accreditation, accredited institutions routinely reject credits granted by other accredited institutions, for inscrutable and self-interested reasons. Some estimates put the annual cost to students in wasted time and tuition in the billions of dollars.[15] The CHE would provide a nexus of information for students, the majority of whom earn credits from multiple institutions. It would also establish a baseline assumption of credit transferability: accredited providers would be required to accept credits from all other accredited providers unless they specifically explain why certain credits are unacceptable.

The CHE would not eliminate the need for regional accreditors, or for the specialized accreditors that provide in-depth examination of discipline-specific programs. Advocates for regional accreditation have testified on many occasions to the crucial benefits of in-depth, confidential peer review. The need for such processes to be conducted in an atmosphere of trust and secrecy is often cited to rebuff critics calling for more transparency in accreditation. In this new regime, regional accreditors could provide peer review unmolested. They could conduct meeting in sound-proof vaults and store reports behind steel doors, if they prefer. If the process is really as valuable as both institutions and accreditors often claim, then regional accreditors should

have no trouble convincing institutions to continue engaging in it and paying to support its expense.

Handing the keys to the public financial aid system back to the public (where they belong) would also free regional accreditors to return to their original purpose: establishing true standards of quality in higher education. The Middle States Commission, along with the other regional accreditors, was founded on the idea that a liberal education means something—and as such, doesn't mean just anything.

"At least eight professors" probably doesn't work anymore as a standard. (Although it would have knocked out Southeastern.) But it wouldn't be unreasonable for a voluntary association to enforce legitimate, ambitious standards for the knowledge, skills and abilities that members impart to their students, not merely in terms of defined curricula but in terms of what students actually, demonstrably learn. Such standards could be set high enough to make meaningful, public distinctions between excellence and mere adequacy.

Accreditors argue that institutional variance makes this impossible. Indeed, the centrality of the "diversity" concept to arguments defending the accreditation status quo cannot be overstated. Asked for thoughts on the newly-reconstituted NACIQI, former North Central Association president Steve Crow, said that commission members need to "understand the tremendous diversity in U.S. higher education and, consequently, the decentralized programs of quality assurance related to that diversity." Bernard Fryshman of the New York Institute of Technology said "Our independent and diverse system of higher education depends on accreditation serving as a barrier against the Department of Education's direct involvement in college and universities. Susan Hatten, consultant to private colleges, said that "accreditation continues to be the best means for promoting quality while respecting diversity." Judith Eaton said that the committee should "operate within a context of respect for responsible institutional independence and academic freedom, as well as investment in the diverse higher education enterprise that has served the nation so well."[16]

Diversity is thus the main justification for both the *structure* of accreditation, with authority fractured and dispersed among dozens of weak, idiosyncratically defined, often contradictory organizations, and the *ethic* of accreditation, which manages to finds glimmers of promise in the most marginal and abject institutions. But while the defenders of accreditation allege that the all-powerful diversity idea is rooted in differences of organizational philosophy and mission, this is untrue. Instead, the American system of accreditation has evolved over time to accommodate diversity in *quality* to an almost infinitely elastic degree.

There was, after all, nothing remotely innovative or divergent about Southeastern's approach to higher education. It offered associates and bachelor's degrees in business, the most common academic major in the nation. It conducted classes in square rooms where students sat in chairs, listening to an instructor. It had departments and degree programs and gave its employees titles like "Registrar" and "Dean of Faculty and Academic Affairs." The lock-step imitation of standard higher education forms extended all the way to the simulacrum of a book store and the Harvard-alluding "Veritas" on the university seal.

The only thing that truly distinguished Southeastern—the only aspect of the university that might legitimately be labeled "diverse"—was the abnormal tendency of enrolled students to not graduate and/or default on their student loans. That and a propensity for financial misadventures among employees and multi-million dollar U.S. Department of Education fines.

Accreditation in America has settled into a series of unacceptably low equilibria: accreditors without the resources to adequately monitor institutions, standards that hover just above total institutional dissolution, a process subject to constant criticism and loss of legitimacy that always manages to live on to another day. This isn't good enough, particularly in a time when more students than ever want and need higher education, when economically marginal students like those enrolled at Southeastern suffer from declining income and increased economic instability, when the consequences of higher education failure are more dire than they have ever been before. The Enron accounting scandals and the role of rating agency-endorsed toxic

financial instruments in bringing about the recent near-collapse of the global economy show the inevitable consequences of allowing vital institutions to be monitored by allegedly independent organizations that depend on those they oversee for funds.

Higher education is too important to allow similar crises to occur. Small and insular, borne of antagonism to government control, accreditation was established at precisely the wrong moment in history, just before the nation's higher education system exploded in size and became irrevocably tied to government funds. Public and institutional interests have been confused and compromised by the accreditation process since the beginning. It's time to separate them, once and for all. Both will be better for it.

Epilogue

By the spring of 2009, Charlene Drew Jarvis had left the Southeastern building. It's not clear how, or why—when asked, university employees declined to describe the exact circumstances of her departure. Accreditors may do little to prevent colleges from crumbling to the ground, but they have at least developed some protocols for helping students emerge from the wreckage in an orderly fashion. Middle States helped appoint an interim president to manage the institution's last days. The university held a final summer session to help as many students as possible finish their degrees, The nearby University of the District of Columbia (which has had its own troubles graduating students over the years) announced that it would accept Southeastern credits in transfer. Trinity Washington University, a private college that serves many DC residents, also stepped in. Students attempting to bring their credits elsewhere were victimized by the accreditation system's inability to manage credit transfer and were frequently refused.

The final class of Southeastern students reacted to the shutdown with a mix of anger and resignation. "I lost $1,300 because one of the classes I took couldn't transfer" wrote a student who enrolled for the first time in January 2009, only to leave three months later when he learned of the accreditation problem.[17] Said another:

> "All I have received to date regarding the accreditation debacle is a series of emails. Initially we were told that they were shutting down online courses due to issues with the accreditation. Based on what I was told at the time, it didn't seem like this would be a long term problem, just a short term issue. If I had known that this was coming I would have accelerated my studies to graduate before this mess took place. Now I find myself in a situation where I only need four courses to graduate but I may have to start all over someplace else. In addition, I am out thousands of dollars in loans that I have to repay for an education that, on paper, is worth nothing. Near the end, they were not even offering the classes that I needed."[18]

Southeastern worked throughout the summer to negotiate a merger with the GS Graduate School, which was founded by the U.S. Department of Agriculture and serves over 200,000 students per year, nearly all working adults, in more than 1,000 courses ranging from foreign language to economics, auditing, and landscape design. GS is, in many ways, everything Southeastern was not: thriving, well-managed, and financially stable. The one thing it lacked was the magic medallion of regional accreditation—the one really valuable thing Southeastern could provide.

But with the medallion in jeopardy, the merger made less sense, and as of mid-September no deal had been reached. On August 31, 2009, Southeastern finally lost the regional accreditation it had clung to, barely, for 32 years. The picture of President Obama disappeared from the Web site, which now simply says "we are not accepting students at this time." Today, the building on 6th Street sits, locked and empty, a monument to mediocrity and ultimately failure, both in the pursuit of higher education and in the deeply flawed accreditation process that allowed unsuspecting students to be ill-served for so long.

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[1] All accounts of the history of the Middle States Commissions are from *History Revisited: Four Mirrors on the Foundations of Accreditation in the Middle States Region,* including Ewald B. Nyquist, "Life Begins at Forty: A Brief History of the Commission," and Richard D. Challener, "The Middle States Association at Age One Hundred, The Last Twenty Five Years: Issues and Challenges 1887 – 1987."

[2] The other five are the New England, North Central, Northwest, Southern, and Western Associations / Commissions. Jurisdictions roughly track names, but there are exceptions—North Central's bailiwick extends all the way to Arizona while Middle States oversees Puerto Rico and the Virgin Islands.

[3] Washington Post cite TK

[4] Washington Post cite TK

[5] Harland G. Blolan, *Creating the Council for Higher Education Accreditation,* The American Council on Education and the Oryx Press, 2001.

[6] Puffer Report, Volume 1: 261, as quoted by Glenn S. McGhee (http://www.insidehighered.com/news/2009/01/28/accredit).

[7] Blolan, p. 39.
[8] Robert C. Dickeson, *The Need for Accreditation Reform,* The Secretary of Education's Commission on the Future of Higher Education, 2006.
[9] Doug Lederman, "Someone Didn't Get the Memo," *InsideHigherEd,* December 19, 2007.
[10] "The Worst Colleges in America," *Radar,* August 2008.
[11] Source TK
[12] Ralph A. Wolff, "Accountability and Accreditation: Can Reforms Match Increasing Demands?" *Achieving Accountability in Higher Education: Balancing Public, Academic, and Market Demands,* Joseph C. Burke editor, Jossey-Bass, 2004.
[13] Southern Association of Colleges and Schools, Disclosure Statement Regarding the Status of Paul Quinn College, July 7, 2008.
[14] www.pqc.edu, retrieved September 20, 2009.
[15] Reference TK.
[16] Doug Lederman, "Advice for the U.S. on Accreditation," *InsideHigherEd,* June 24, 2009.
[17] Email to author, June 17, 2009.
[18] Email to author, June 16, 2009.