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Dear Chairman Phillips,

I am writing in response to your request, as Chair of the subcommittee of the National Advisory Committee on Institutional Quality that has been charged with developing a set of legislative recommendations for the 2013 renewal of the Higher Education Act, for comments on the current system of accreditation of institutions of higher education. I am delighted to have this opportunity to respond, as I believe there are aspects of the current system that are in need of reform.

Before responding to the specific questions in the charge to the committee, I would like to offer several general observations about the sector of the U.S. higher education system that I understand best: research universities. First, the United States currently is the world leader in higher education, whether measured by international rankings such as those provided by the U.K.’s Times Higher Education World University Rankings or Shanghai Jiao Tong University’s Academic Ranking of World Universities, or by the choices that students around the globe make each year about where to pursue their studies. Our higher education system at its best is among America’s most globally competitive enterprises and comprises a set of institutions that are admired around the world. As the members of the subcommittee consider ways that the accreditation process can be used to improve the overall quality of the education available to post-secondary students, I urge them to adopt a “do no harm” approach to a sector of our society that contributes so significantly to American competitiveness.

Second, the nation’s research universities have dual missions: to educate young men and women for careers and lives where they are able to contribute meaningfully to society and to push back the frontiers of knowledge, thereby serving as powerful economic engines. With their focus on fostering innovation and entrepreneurship among young scientists and scholars, U.S. universities are credited with generating a significant fraction of the gain in economic prosperity that this country has enjoyed in recent years, through the founding of new industries such as biotechnology and e-commerce. In the face of increasingly intense international competition for students and ideas, it is imperative that the nation preserve and even enhance the strengths of those institutions that are national and international in scope and that engage in teaching and research at the highest levels of quality.

To turn to the first question of the charge, “How well does our current accreditation/recognition system protect the interests of the taxpayer who is underwriting that investment in education?”, I would answer, “Not well enough.” Accreditation historically has been intended to serve two purposes: (1) to insure that institutions eligible for federal
financial aid meet basic threshold standards of quality; and (2) to encourage institutional self-
improvement through periodic external peer review. The most important of those goals, in my
view, is the first one. Taxpayers deserve to know that students directly, and society indirectly,
are being well served by the institutions that they support through student loans and grants. Yet
two of the most effective ways of measuring educational effectiveness—graduation rates and
career outcomes—are significantly undervalued in the current standards by which institutions are
judged for accreditation. Instead, over the last decade there has emerged an over emphasis on
collecting voluminous amounts of information on “student learning outcomes” that are not tied
in any way to whether students graduate and are prepared to be useful members of society. With
the current focus on quantification of learning outcomes, I fear that the real point of higher
education is being lost.

One of the great strengths of American higher education is the diversity of its institutions. They
vary in size, mission, degree of state support, and in many other ways. Some draw their students
largely from their local communities or regions, while others are more national or even
international in scope. This diversity has the great benefit of providing points of entry into
higher education for students of very different talents and interests, but it has exposed structural
flaws in the current accreditation system, which was founded on geographical, rather than sector
criteria. While geography may have been a useful organizing principle for accreditation at a time
when travel across the country was time-consuming and expensive, and may even now make
sense for institutions that are largely local or regional in nature, there are many institutions for
which it does not make sense. By having each of the six regional agencies oversee everything
from small local community colleges to large research-intensive universities that draw their
students and faculty from throughout the world, the current system creates incentives to adopt
standards and review processes that either are so generic as to be meaningless in any specific
context, or that are so focused on one context that they are meaningless, or even damaging, in
other contexts.

Developing a more flexible and nuanced approach to accreditation has become increasingly
important as the nature of education has changed. Students now engage in independent study, in
learning programs that reach outside the classroom, and in international study—initiatives that
are helping to prepare students for the new global economy and for lives in which they will need
to continually cope with the discovery of new knowledge and the development of new
technologies. As such programs continue to expand and evolve, it is even more likely that a
“one-size-fits-all” approach to accreditation will constrain innovation, creativity, and
improvement, even among institutions with a proven record of excellence in teaching and
research.

So in answer to the second of the questions in your charge, “If we were starting now, would we
design this system?”, my answer would be a resounding “No!”

“How might a system we would design differ from what currently exists?” I would argue
strongly for a sector-specific national system that would allow each agency to develop standards
that are relevant to its sector, and thereby be able to compare apples to apples. Understanding
that the devil will be in the details, I would suggest starting with relatively broad categories, such
as research-intensive universities, liberal arts colleges, for-profit technical education, and 2-year
community colleges. Freed from having to serve such broad constituencies, these more targeted agencies could then work with research universities and colleges that competitively draw students both nationally and internationally to set threshold standards that are significantly more demanding than apply now within the regionally-based agencies, such as high graduation rates, excellent placement records, demonstrated alumni satisfaction over time and outreach to students from diverse backgrounds. Institutions that meet these higher threshold standards should be judged to have met the first purpose of accreditation (assurance that they meet agreed-upon threshold standards of quality), so that the time and dollars they devote to the accreditation process can be focused instead on accreditation’s second purpose: strengthening the institution’s pursuit of its mission through measures that are appropriate to its particular circumstances, while not requiring the institutions to engage in practices that detract from it.

That raises a second aspect of the current accreditation system that is badly in need of reform—the enormous administrative and financial burden it places upon faculty and staff at a time when resources are either flat or declining. In their quest for one-size-fits-all measures of performance and learning, accreditation agencies have come to demand volumes of paperwork and bureaucratic reporting, much of it untied in any constructive way to the educational mission of the institutions that they are evaluating. There is evidence that the cost of going through an accreditation review has been escalating at an alarming rate. It is becoming common for institutions to report that the cost of preparing for a decennial review exceeded $1 million and occupied hundreds of hours of staff time. One institution reported a 250% increase in cost over the last ten years. Few university presidents believe that this effort is even remotely commensurate with the benefit that the review provides to the institution. Furthermore, there seems to be a growing practice of finding even highly regarded colleges and universities wanting in the decennial review, largely for failing to meet quantitative standards developed by the accrediting agencies, which then requires the institutions to generate additional documentation between reviews. In a recent paper prepared for the National Institute for Learning Outcomes Assessment, it was reported that a staggering two thirds of institutions that underwent review by the Middle States Commission on Higher Education and 80% of those in the New England region required follow up actions related to assessment. These follow-up actions generally consist of further evaluations, reports, and paperwork that provide no clear benefit to students and are of no interest to the parents and donors who pay their tuition. There needs to be a serious reckoning of benefit versus cost in this bureaucratic system that seems to be running amok.

Let me turn to what is surely the most contentious issue surrounding accreditation today, and that is the surge in emphasis on metrics around student learning outcomes. In recent years the balance between assessing whether an institution has met threshold standards versus assessing continuous improvement has heavily shifted to the latter goal, with responsibility for decision-making shifted from knowledgeable peers to agency staff. Furthermore, the nature of what is meant by “continuous improvement” has swung from a broad assessment of what the college or university is doing to improve to a narrow focus on quantitative measures of student learning, unlinked, as I said earlier, to whether that learning is producing productive citizens. The last set of questions posed in the charge

reflects this change in focus: “Should there be common standards for learning outcomes/student achievement (should the rule of construction stand or should there be a set ‘standard’ for student achievement?) Who should decide those? How should they be measured? What should be the metrics of quality? What benefits (other than access to student aid)” accrue in a quality assurance process? Are those benefits worth the costs?”

A credible college or university, one deserving of accreditation, should always be focused on ways to improve the quality of education it provides to its students. In the past, decennial reviews were opportunities for an institution to improve through self-reflection and intensive peer review. For example, in Princeton’s last review in 2004, we used the occasion to lay out plans for a new residential college system that more thoroughly integrated our academic program into the residential experience of our undergraduates. One of our goals was to significantly improve academic advising and enhance the extent to which academic pursuits extend outside the classroom. This was chosen for our self-study because it was the highest priority of the university at the time. The reviewers were enormously helpful in pointing out possible alternative ways to proceed, a number of which were incorporated into the ultimate plan. In our judgment, this process played a positive role in our effort to “continuously improve,” but it was targeted specifically on Princeton’s needs at the time. It did not lend itself to a judgment by “common standards,” nor would any application of “common standards” have been useful to us or helped to improve student learning. The fact that we were undertaking this initiative, and taking it very seriously, provided clear evidence that we were committed to the goal of continuous improvement. That an exercise so clearly beneficial to the institution would no longer be accepted as evidence for a commitment to improvement is a sad comment on how far we have moved in the wrong direction in our approach to accreditation.

Since this review, the definition of what constitutes continuous improvement has been rapidly narrowing to focus almost exclusively on improving statistical or formulaic measures of student learning outcomes. Some institutions may judge these measures useful, but others may find that the effort to compile and analyze them produces only questionable evidence of educational quality and deflects resources and efforts that could better be applied to clear areas of educational need. The narrow focus on quantifiable “student learning outcomes” relies on a conception of continuous improvement that may make sense in some circumstances, but it is potentially damaging to the quality of some of our best colleges and universities. This is not to say that measuring student learning and learning from it are not important. They are, and they should be encouraged by any means that are appropriate to the institution and to the individual course of study, but they should not take the place of nuanced and institution-specific initiatives to achieve real continuous improvement and they should not be used to impose a least-common-denominator approach to accreditation that runs the risk of diminishing quality and creativity, not enhancing it. In attempting to address issues of genuine concern in American higher education—diploma mills and institutions granting credit for courses that require little or no work—we risk imposing regulatory requirements that are not appropriate, or even necessary, for all institutions.

The charge to the committee asks whether there should be “common standards” by which accreditors measure student learning. I would argue that such an approach would fly in the face
of the enormous diversity among educational institutions that is a great *strength* of the American system. As stated earlier, universities and colleges differ in many ways, including their educational philosophies and pedagogical approaches. Requiring institutions to conform to a common standard would risk damaging the diversity of approaches that has benefited American students in the past by enabling them to enroll at the institutions that are best able to address their diverse needs and talents. Students learn in different ways and at different paces; they pursue interests as diverse as mathematics and comparative literature; and they have a broad range of life goals and aspirations. No standard measure of student learning could be equally and fairly applied to a mathematics concentrator and a student of comparative literature; the nature of their learning is fundamentally different and as a country we need both excellent mathematicians and members of our society who can help us understand the great literatures of many cultures. I would strongly urge the subcommittee to preserve the right of colleges and universities to define their educational mission, and to develop their own processes, standards and metrics for measuring how effective they have been in realizing that mission.

The question of “who decides” goes to the heart of the matter. Unlike many nations elsewhere in the world, the United States has nurtured a vibrant and vigorous respect for academic freedom. Under such a system, American higher education has flourished. I respect the right of the public and the government to seek assurance that institutions attended by students with the assistance of federal funds are meeting appropriate standards of quality. I believe that, rightly done, accreditation can play a positive role in sustaining and enhancing the country’s institutions, even as it also seeks to insure that all accredited institutions meet appropriate basic standards. But if recent trends continue, in which the staff of accrediting agencies seek to substitute their own judgments about what mission an institution should pursue and about how the institution can best achieve that mission and measure success, we risk damaging the country’s leading institutions.

In its deliberations I would urge the members of the subcommittee to be clear about what problem they are trying to solve, respectful of the strengths of our current system even as they address its weaknesses, and avoid causing harm to the aspects of higher education that are working well.

Sincerely,

Shirley M. Tilghman
President