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PERSUASIVE NARRATIVE: EXAMINING POLICY
ACTOR INFLUENCES ON ACCREDITATION
REFORM LEGISLATION

A Dissertation Submitted in Partial Fulfillment
of the Requirements for the Degree of
Doctor of Philosophy

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College of Education and Behavioral Sciences
Department of Leadership, Policy and Development:
Higher Education and P-12 Education
Higher Education Student Affairs Leadership

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This Dissertation by: Rebecca Lynn Woulfe

Entitled: *Persuasive Narrative: Examining Policy Actor Influences on Accreditation Reform Legislation*

has been approved as meeting the requirement for the Degree of Doctor of Philosophy in College of Education and Behavioral Sciences in Department of Higher Education Student Affairs Leadership.

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ABSTRACT

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Accreditation is an integral component of the higher education landscape. Regional accreditors accredit approximately 7,000 institutions of higher education in the United States. In the decade from 2008 to 2018, these accrediting agencies have been the recipients of significant criticism and demands for change. This study explored federal public policy narrative related to accreditation reform through the lens of Narrative Policy Framework (NPF) theory. The research was bounded by an embedded case study of legislation from the 115th U.S. Congress. The subcomponents identified within the case were two pieces of legislation written to reauthorize the Higher Education Act (HEA). The two bills: Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act and the Aim Higher Act, included significant recommendations for accreditation reform.

The purpose of the study was to determine how competing coalitions use narrative in public policy documents to escalate the issue of accreditation reform, and how narrative contributes to the formation of the subsequent policy. The findings from the study suggest that narrative, in particular the use of narrative that described the exploitation of students and taxpayers, contributed to the prioritization of the issue of accreditation reform. Identified as the devil shift strategy in NPF theory, pro-reform

policy actors consistently used the inclusion of villains (accrediting agencies) and victims (students) in their narrative to garner the attention of legislators. Additionally, the findings indicated these policy actors used additional narrative strategies to inform and influence the formation of the accreditation reform legislation introduced during the 115th Congress.

Public policy at all levels, but especially at the federal level, is a significant factor in how institutions of higher education conduct their business, support students, and advance research agendas. This study uncovered the significant influence policy actors have on the prioritization and formation of higher education policy. Diverse policy actors from mass media, think tanks, advocacy groups, and foundations use their social and financial capital to forward their agendas and mold the future of higher education through accreditation reform. It is critical for higher education leaders to ensure all voices contribute to the conversation and that policy actors use narrative strategies to minimize divisiveness and to build consensus.

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INTRODUCTION TO THE STUDY

The mention of the word accreditation in higher education circles sparks a range of responses. Institutional administrators recognize how accreditation ensures that the millions of dollars of federal funding continue to funnel through their coffers. Faculty members recall the arduous work of assessment and the documentation of student learning outcomes—activities that may detract from research and teaching. The students on college campuses know little of accreditation and among those who may know, likely wonder if accreditation affects them at all. Regardless of how these stakeholders view accreditation, regional accrediting agencies accredit the vast majority of colleges and universities in the U.S., having responsibility for all public, private, nonprofit, and degree-granting, two- and four-year institutions. Because all categories of higher education institutions benefit from accreditation, this study does not distinguish between private and public institutions. Should an accreditor withdraw an institution's accreditation, it faces an existential crisis since accreditation is critical to the financial sustainability of colleges and universities. Accreditation reform is therefore a powerful lever that policymakers can use to initiate change in higher education policies (Gaston, 2014). Because federal lawmakers cannot directly impose laws on postsecondary education, policymakers skirt this limitation by writing policy to regulate the regulators—accrediting agencies. The Higher Education Act (HEA) is an example. Title IV of the

HEA defines the role of accrediting agencies, and legislators have modified the role of accreditors in each HEA reauthorizations over the last 50 years.

Higher education accreditation has several masters and many critics, and the call for accreditation reform has a long history (Fritschler, 2008). Beginning in 1968, each reauthorization of the HEA act purported to "fix" accreditation. Additionally, when higher education came under fire in 2005-2007 through the Spellings Commission, the U.S. Department of Education (USDE) followed up with aggressive moves to regulate accreditation (Ewell, 2018). Legislators, special interest groups, the public, and those within academia have publicly criticized regional accreditation (Alstete, 2006; Brittingham, 2008; Crow, 2009; Eaton, 2007; Gaston, 2014; Wergin, 2012). The criticisms are varied and range from minor infractions to an all-out dismissal of how institutions of higher education are accredited. Legislators disapprove of the self-regulation inherent in the process and suggest a collegial quid pro quo exists between peer reviewers and institutions. Business leaders oppose the closed system created by accreditors and institutions and lobby for a more innovative system that permits organizations outside of higher education to deliver credentials and receive their fair share of federal funding. Because of increased tuition rates and higher borrowing levels, students and families question the lack of transparency on outcomes. Consumers of higher education want to ensure they are getting value from their investment. Changes based on these criticisms and recommendations could have a significant influence on higher education, providing evidence for a study to explore how policy actors use public policy processes to influence accreditation reform.

I selected the *process* of public policymaking because it provided a rich arena to explore accreditation reform. Through the policy process, special interest groups, political leaders, and trade associations influence the environment in which higher education professionals work and students learn. Because policy and regulations have a heavy hand in determining the direction of higher education, a study of public policy processes provided insight into this influence. For this study, policy actors fell into two categories, those who were determined to reform accreditation (and by association higher education), and those who wanted to maintain the status quo. These two adversarial groups used a variety of tactics and strategies to move their agendas forward.

This study focused on the use of narrative as a strategy to influence public policy. Narratives are potent tools and lay the foundation of human communication and persuasion (McBeth, Lybecker, & Husmann, 2014; O'Bryan, Dunlap, & Radaelli, 2014). To frame the use of narrative in public policy making, I used the public policy theory of Narrative Policy Framework (NPF). NPF provided a foundation for examining narrative through a non-contextual lens—evaluating the components and structure of the narrative to analyze how policy actors used language to persuade, rather than the specific topic of a narrative or story (McBeth, Lybecker, & Garner, 2010).

Background

Higher Education Accreditation

The approximately 7,000 institutions of higher education in the U.S. enroll over 19.1 million students (U.S. Census Bureau, 2016). Because the Tenth Amendment of the U.S. Constitution ensures that higher education is not within the realm of the federal government, these institutions have, in theory, autonomy from federal regulations

(Brittingham, 2009; Neal, 2008). Without federal oversight, a system of self-regulation emerged that eventually led to the current system of accreditation.

In order to monitor quality, higher education followed other specialized professions, such as medical and legal fields, and incorporated a system of self-regulation through regional accrediting agencies (Brittingham, 2008). For all of these professions, however, the U.S. federal government does have the authority to protect citizens' best interests and civil rights. Through this authority, legislators and policymakers enacted the Higher Education Act (HEA) in 1965 as a means to regulate higher education. The HEA did not replace the accreditation system, but it did use Title IV of the act to define how the federal government would distribute federal funding to institutions, among other requirements. The HEA assigned the task of monitoring quality to the non-governmental accrediting agencies. Title IV directed accreditors to use explicit criteria to ensure that only legitimate colleges and universities could access federal funding. It is a solution that (1) provides some degree of control over higher education, (2) remains compliant with the Tenth Amendment, and (3) inexorably entangles accreditors with the federal government (Brittingham, 2008; Suskie, 2015).

There are three types of higher education accreditors: regional accreditors that accredit the entire institution; national accreditors that accredit institutions that fall outside of the regional accreditors due to factors such as the exclusion of a general education focus; and specialized accreditors that accredit specific programs within an institution (Suskie, 2015). Because the regional accreditors accredit the vast majority of institutions in the U.S., 73.7% of degree granting institutions, this study will focus on reform activities associated with this category of accreditors. The U.S. regional

accreditation system consists of six regional accreditors, each charged with addressing the needs and mandates of diverse constituents ranging from the federal government to the leadership of the individual institutions. In addition to monitoring the quality of education provided by colleges and universities, these agencies are responsible for driving quality improvement and ensuring that colleges and universities meet all federal regulations.

Theoretical Framework

I used Narrative Policy Framework (NPF) as the theoretical framework for this study. Briefly described, NPF is a relatively new public policy process theory that systematically studies generalizable narrative elements to analyze the role and influence of narrative in the process of policymaking (McBeth, Jones, & Shanahan, 2014). One of the defining characteristics of NPF is its focus on narrative patterns and its inattention to the context of the narrative (Jones & Radaelli, 2015; McBeth, Jones, & Shanahan, 2014). NPF researchers focus on the setting, characters, plots, and morals found in narratives associated with public policy (Jones & McBeth, 2010). Researchers use these elements across different policy contexts to determine how policy actors use narrative to influence policy. NPF scholars have defined strategies that policymakers use to sway and manipulate opinions, eventually influencing the outcome of policymaking. These strategies include scope of conflict, causal mechanisms, and devil/angel shift (McBeth, Jones, & Shanahan, 2014).

Several studies have incorporated NPF as a policy theory, primarily in the field of highly contested environmental policy. For example, Gupta, Ripberger, and Collins (2014) explored the controversial process of siting a nuclear power plant in India. The

authors explored the narrative produced from winning and losing coalitions and the

difference in strategies. The theory is relatively new to the education policy arena. Ertas

(2015) used NPF to explore how policy narratives influenced public opinion regarding

charter schools in a study on the individual level of narrative influence. Ertas exposed

participants to different narratives to determine how narrative strategies shape individual

public opinion. Findings suggested both skeptical and supportive narratives shifted

individual beliefs on the topic of charter schools. Another related study is Matthews'

(2012) exploration of narrative in the federal government's role in higher education. This

study incorporated Kingdon's (1994) multiple streams theory, a policy theory that closely

aligns with NPF. The findings demonstrated how the role of narrative contributed to the

emergence of a problem stream and a policy stream to create an open policy window.

This policy window provided the necessary opening for the passage of the 1992

Reauthorization of the HEA.

This dissertation focused on two narrative strategies inherent in NPF theory:

scope of conflict and *the devil/angel shift*.

Scope of conflict. NPF scholars attach the labels of winner and loser to the

competing coalitions. NPF researchers label the group working to maintain the status quo

as winners because these groups typically have an advantage. The theory labels reform

groups as losers because they have a significant challenge to initiate change (Gupta et al.,

2014). NPF suggests individuals and groups associated with both the winning and the

losing side of an issue use narrative uniquely to achieve their goals. The scope of conflict

strategy states that losing coalitions attempt to *increase* participation (policy issue

expansion), and winning coalitions attempt to *restrict* participation (policy issue

containment) to maintain the status quo (McBeth, Shanahan, Arnell, & Hathaway, 2007; Shanahan, Jones, & McBeth, 2011; Shanahan, Jones, McBeth, & Lane, 2013).

Policy actors use a scope of conflict narrative strategy to either expand or contract focus on a policy issue (McBeth, Jones, & Shanahan, 2014). Losing coalitions can achieve issue expansion by focusing on the high costs of the current policy and minimizing any associated benefits. In contrast, policy actors on the winning, or status quo side, take an alternative approach and seek to focus on the benefits and minimize the costs (Shanahan et al., 2013). As an example, when Gupta et al. (2014) examined the narratives from the nuclear power controversy study, they found strong support for NPF's scope of conflict strategy. The researchers identified the pro-nuclear coalition as winning and found significant evidence showing how the coalition frequently discussed how the project would benefit a great number of people. Conversely, the losing coalition (anti-nuclear) focused on the high cost of the project (Gupta et al., 2014). Additionally, the sheer number of voices involved in an issue can also have an impact on policy outcomes. The losing side, or opponents of the status quo, works to increase the number of policy actors involved (Jones & McBeth, 2010). Researchers have used scope of conflict to analyze the use of narrative in studies ranging from the examination of religious politics (Kusko, 2013) to the contentious policy issue of wind turbines in Massachusetts (Shanahan et al., 2013). In addition to analyzing scope of conflict, NPF researchers evaluate how policymakers personify the issue using character archetypes.

Devil/angel shift. The devil/angel shift is a second narrative strategy that examines archetypical characters within policy narrative. Stories and narratives rely on the use of character archetypes to establish traits such as fears, goals, motivations, and

personality characteristics (Schmidt, 2001). Policy actors use the devil/angel shift narrative strategy to influence opinions related to a policy issue. NPF scholars have refined the use of devil shift over the last decade after Sabatier, Hunter, and McLaughlin (1987) initially presented the concept. Policy actors use the devil/angel shift strategy to effectively influence the outcome of a policy issue. The devil shift occurs when a policy actor exaggerates "the malicious motives, behaviors, and influence of opponents" (Shanahan et al., 2011, p. 554).

NPF scholars have identified the use of archetypes to identify the implementation of the devil shift strategy. By studying the incorporation of hero, villain, and victim characters in policy narratives, researchers can examine the concept of devil or angel shifts (Shanahan et al., 2011). Examples of research incorporating the devil/angel shift include Protopsaltis' (2008) study of Colorado's higher education voucher system, and Longaker's (2013) study of the Sao Paulo, Brazil Lesbian, Gay, Bisexual, and Transgender (LGBT) movement. In Protopsaltis' study of the Colorado voucher system, members of the losing coalition "were certainly characterized by mutual suspicion" (p. 490). The characterization of the opposition as villainous demonstrated the use of the NPF devil/angel shift strategy. Researchers categorize individuals or groups who fix problems as heroes, those who cause problems as villains, and those who suffer at the hands of the villain and/or are saved by the hero as victims. In a devil shift strategy, policy actors more frequently reference victims and villains. In contrast, researchers identify a greater emphasis on heroes and a commitment to problem solving when policy actors incorporate an angel shift.

NPF coalition labels of winning and losing appear to have served scholars well in previous NPF studies. These studies have focused primarily on highly-contested environmental issues such as fracking or nuclear power where there is a significant difference of opinion between the two sides. This study on accreditation reform policy had opponents that were not so well defined and an issue emerged when referencing groups as either a winner or loser. Throughout this dissertation, although I reference these labels when required, I primarily use the labels of pro-reform and status quo. Based on NPF theory, I had to label the status quo coalition as the winner and the pro-reform coalition as the loser. It is noteworthy that neither of these coalitions used these labels, adding to the possibility for confusion.

Statement of the Problem

Political stakeholders use federal accreditation policy to influence institutions of higher education (Gaston, 2014). Policymakers and stakeholders interested in higher education and accreditation come from varied backgrounds and bring conflicting agendas to the policymaking process. In debating accreditation reform, reformers have an agenda focused on innovation, significant revisions to the accreditation process, and consumer protection. The opposing agenda, held by policymakers and stakeholders supporting the status quo, focuses on maintaining higher education autonomy and self-regulation. These conflicting agendas pose several problems for higher education professionals. First, special interest groups and political officials view higher education from the outside, often with minimal understanding of the intricacies associated with higher education (Eaton & Neal, 2015). Because these stakeholders typically attended college, they use their experience as a student, and possibly the higher education experience of their

children, as the benchmark for evaluating the strengths and weaknesses of higher education.

The first issue higher education professionals face is the varied motivations, divergent interests, and power differentials that policy stakeholders bring to the process. Political officials, represented by legislators, White House actors, and agency leaders, tend to be more involved in high-profile policies and subjects that they can more easily understand (Natow, 2015). They are dependent on elections and re-elections that may depend on their ability to influence and deliver new policy (Hall & Deardorff, 2006). Hall and Deardorff (2006) describe legislators as resource-constrained, suggesting these policymakers are typically working on more than one policy at a time under limited time and resources. Additionally, lobbyists and campaign contributors regularly approach these political actors, potentially influencing their support and priorities.

The second issue for higher education leaders relates to the power and influence of special interest groups. The policy actors involved in accreditation reform are often highly funded and rich with resources. Typically, an influential philanthropist or other public funding initiative provides funding for special interest groups (Howlett, Ramesh, & Perl, 2009). These groups or coalitions combine the agenda of the philanthropist with robust resources to influence policy. Scholars have also referred to these groups as venture philanthropists to recognize their efforts to level resources for the public good. I chose not to use this term as it is an evolving term (Di Lorenzo & Scarlata, 2018). Gandara, Rippner, and Ness' (2017) study on performance-based funding suggests these well-funded groups may coerce policy actors using financial incentives. Special interest groups are interested in elevating higher education policy agendas through a call to

action. They are expert at taking complex subjects and simplifying them so other policy actors and citizens can better understand the issues (Gandara et al., 2017). These organizations also use their resources and political shrewdness to build coalitions that consist of elected officials, interest group leaders, media representatives, and think tanks (Ness, 2010). The interests of political actors and special interest groups may be misaligned with the interests of colleges, universities, and their students. Researchers need to conduct a closer examination of interest groups, as these policy actors are effective at agenda setting and inciting a bandwagon effect to promote their agendas (Miller & Morphew, 2017).

Finally, as evidence of the importance and influence accreditation policy has on higher education, the American Association of State Colleges and Universities (AASCU) identified "changes in federal law" as the number one policy issue for states (American Association of State Colleges and Universities [AASCU], 2018). In addition to the revision of the tax bill in 2017, the organization identified the potential for the reauthorization of the HEA in 2018 to affect states and higher education in a myriad of ways. "For the first time in the 11-year history of the *AASCU Top 10* report, federal policy is the leading issue affecting higher education policy" (AASCU, 2018, p. 2). In a field that identifies self-regulation as important to its continued success, the influence of outside forces on higher education accreditation policy is an issue worthy of additional attention. Professionals in the field of higher education benefit from research into public policy processes to better understand the influences, centers of power, and policy actor strategies. Results from this research can inform stakeholders and provide additional

insight as higher education accreditation and associated public policy continue to guide our institutions.

Significance of the Study

This study explored how policy actors used public policy processes to influence accreditation reform. Public policy reshapes higher education through the accreditation process, and "accreditation redesign may have a far-reaching impact on institutional planning, regardless of an institution's regional affiliation" (Jackson, Davis, & Jackson, 2010, p. 10). Accreditation is a powerful lever in influencing higher education, because without accreditation, institutions do not have access to federal funding. The federal government is responsible for funding $30.68 billion in Pell Grants, $18.25 billion in tax credits (Turner, 2017), and an additional $1.1 trillion in student loans (Looney & Yannelis, 2015). Loss of this funding due to a loss of accreditation forces institutions to close their doors. Accreditation is vital to a healthy higher education environment; therefore, there is significance in a study of how policy actors drive innovation and change in accreditation policy.

This study looked at the policymaking process through the lens of NPF to better understand how policymakers use narrative to influence the policy process. "NPF starts with the assertion that the power of policy narratives is something worth understanding" (McBeth, Jones, & Shanahan, 2014, p. 225). Stone (2012) suggests that narrative stories are central to the process of defining and contesting policy problems. In her research, Stone determined that narrative devices are especially persuasive and emotionally compelling. Crow and Berggren (2014) suggest narratives go beyond policy and are important to the understanding of any cultural, political, or institutional process.

Narrative can move humans to take action they would not normally take, and to persuade individuals, even when facts demonstrate a different story (McBeth, Lybecker, & Husmann, 2014).

Policy research scholars emphasize the importance of ongoing public policy research. Schneider and Sidney (2009) emphasize the potential impact of public policy on specific social groups. These researchers stress how the policymaking culture has become "increasingly negative, divisive, and more intent on 'winning'" (Schneider & Sidney, 2009, p. 116). It is critical to consider who benefits and who wins when policymakers manipulate opinions and embed these opinions in policy formation over time (Weible, 2014). As the role of policy grows stronger in the regulation of higher education and higher education accreditation, it is important for professionals in the field to have a thorough understanding of how policy actors influence the policy process. Powerful special interest groups, think tanks, and political officials use narrative elements to persuade policymakers and the public to align their beliefs and opinions with those of these coalitions. Advocacy groups also use narrative strategies to move their agendas up the priority ladder and focus political and public attention on the changes desired by reformers. Increased awareness of the tactics and strategies used by policy actors to influence policy is critical to higher education leaders. This increased understanding of how policy actors use narratives in the public policy process to influence accreditation reform provides higher education leaders and advocates with a clearer perspective. When higher education leaders can better decipher the stories told around accreditation reform, and participate consciously in telling their own stories in support of the mission of higher education, all stakeholders will benefit.

Research Questions and Methodology

Overview of Research Questions

Researchers have used NPF as a framework to study the role of narrative in policy learning and in shaping policy solutions (McBeth, Jones, & Shanahan, 2014). As an example, research by Jeon and Haider-Markel (2001) shows how changing the narrative regarding disabilities led to a change in policy. NPF scholars cite such research to demonstrate that narrative "can play a more powerful role than science in influencing opinions" (McBeth, Jones, & Shanahan, 2014, p. 243), and can serve to bring a policy issue to center stage. Topics receive the attention of legislators for a variety of reasons including their own beliefs, current political climate, and public interest (Hillman, Tandberg, & Sponsler, 2015). Policy actors on both sides of an issue can use narrative to either increase the public's awareness of an issue or minimize it. Therefore, this study's first research question examined how policy actors used narrative to escalate an issue and drive legislators to introduce legislation for policy change. Of the narrative strategies identified by NPF scholars, scope of conflict aligns with the examination of policy prioritization. Specifically, researchers explore this NPF strategy by examining how policy actors describe the distribution of costs and benefits (McBeth, Jones, & Shanahan, 2014).

The first research question addressed the influence of policy actors on the *prioritization* of a policy issue:

Q1   How do policy actors use narrative strategies to promote accreditation reform as a priority issue?

To investigate this research question, I examined the following hypotheses:

> H1 Policy actors will use *issue expansion* as a narrative strategy to promote accreditation reform as a priority issue. Groups will emphasize costs and diminish the opposing groups' benefits.

> H2 Policy actors will use *issue containment* as a narrative strategy to minimize accreditation reform as an issue. Groups will emphasize benefits and diminish costs in an effort to maintain the status quo.

Additionally, numerous political actors use narrative and stories to support, defend, oppose, or transform the regulatory outcome of legislative actions. NPF suggests the archetypes of hero, victim, and villain are common elements used to influence these outcomes. In studying the role of narrative in the formation of policy affecting accreditation, this study examined the use of these archetypes in the narratives associated with the introduction of the 2018 reauthorization of the Higher Education Act (HEA), legislation designed to affect change in higher education accreditation. Therefore, the second research question of this study addressed the *formation* of policy:

> Q2 How do policy actors use narrative archetypes to influence the formation of accreditation policy?

To investigate the potential of NPF as a policy theory in answering this study's second research question on how policy actors use narrative archetypes to influence accreditation policy formation, the study examined the following hypotheses:

> H3 Accreditation reformers will use the devil shift strategy and will include a high ratio of villains to heroes. Policy narratives will seek to vilify their opponents.

> H4 Policy actors supporting the accreditation status quo will use the angel shift strategy; narrative from supporters will have a high ratio of heroes to villains. These narratives will seek to identify heroes and allies.

Specifically, this study investigated the language and stories told by advocacy coalition members and individuals to determine if they used narrative archetypes of hero,

victim, and villain; and whether or not the use of these archetypes influenced the formation of accreditation policy. These archetypes corresponded to the devil/angel shift strategy identified by NPF theorists (Jones & Radaelli, 2015; Shanahan et al., 2013). For example, in the aforementioned study on wind turbines, researchers Shanahan et al. (2013) found distinct differences in how competing coalitions used narrative elements. Specific to the devil/angel shift strategy, the researchers' data suggested the losing coalition used the devil shift to demonize their opponent, in contrast to the strategy used by the winning coalition.

This study sought to determine if NPF theory explained the role of narrative in shaping policy and advancing policy learning using generalized storytelling elements. The study investigated how policymakers used narrative to elevate policy issues related to higher education accreditation. Additionally, the study examined how policy makers used narrative archetypes to influence the formation of accreditation reform policy.

Summary of Study Design

An interpretivist worldview grounds the study. Jones, Torres, and Arminio (2014) suggest that one's worldview represents how an individual defines his or her relationship with the world. Within an interpretivist research design, the following six key ideas are typically present: artifacts are created by humans; these artifacts hold meaning (maybe different meanings) for stakeholders and the researcher; meaning can change over time; meaning is interpreted by participants and researchers; the meaning making is socially constructed; and language plays a role in understanding the world (Schwartz-Shea & Yanow, 2012). The exploration of narrative and storytelling aligns with an interpretivist's focus on social construction and the importance of language.

From this epistemology, and my interest in addressing the importance of policy processes, the methodology used was a case study. Case study research design is well suited to questions of process (Merriam, 2001). To study a defined process, defining or bounding the process to a single instance is advantageous. For this study, it was beneficial to define an instrumental case, one that is representative of many, rather than one that is unique (Creswell, 2013). Legislation to reauthorize the Higher Education Act (HEA) that was proposed during the 2017-2018 legislative session defined the case, with a specific focus on the components of the act related to higher education accreditation. An excess of narrative on accreditation reform exists in the literature and in the media. By using the policy narrative associated with the reauthorization of the HEA exclusively, I was able to specifically define the range of documents and narrative texts to review. Precedents for using legislation to define a case study include Protopsaltis' (2008) study of the legislation that led to the adoption of Colorado's College Opportunity Fund (Senate Bill 189), and Natow's (2013) case study on three regulations (gainful employment, accreditation and student outcomes, and distance education and teach-out plans) implemented by the Department of Education. I collected documents leading up to and through the introduction of HEA reauthorization legislation such as the Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act and the Aim Higher Act, during the 115th Congress, January 2017 through December 2018. I included narrative from policy documents, the media, and congressional debate and discussion related to the legislation.

To examine the public policy process, my first step was to identify the key stakeholders and policy actors involved in accreditation reform. I assigned these groups

or individuals to a category based on whether they advocated for accreditation reform or pressed for the status quo. I collected, read, and analyzed narratives written or supported by the two groups and identified their use of narrative elements. I used a qualitative coding scheme informed by the theoretical framework of NPF to code the data. Additionally, I identified the supporters and opponents of the HEA reauthorization legislation. I coded their narratives and stories from speeches and congressional hearings along with any written documentation.

Definitions

Accreditation: A quality review process conducted by professional peers whereby an agency evaluates an institution or program to determine whether it has a minimum level of adequate quality.

Accreditation Reform: The action or process of making changes in the practice of accreditation. Includes the social, political, and institutional practices associated with higher education accreditation.

Higher Education Act (HEA): The original legislation was signed into law in November of 1965 as part of President Johnson's Great Society domestic agenda. The intention of the law was to strengthen higher education and increase federal funding. Financial assistance for students is covered in Title IV of the HEA. Reauthorization has occurred in 1968, 1972, 1976, 1980, 1986, 1992, 1998, and 2008.

Policy Actors: Individuals or groups who have an interest or stake in policymaking and/or policy issues.

Policymaking: A broad term used to reference any activity related to the creation of public policy. Includes, but is not limited to, statues, laws, regulations, executive decisions, and government programs (Birkland, 2010, p. 9).

Reauthorization: The legislative process, typically carried out every five years (in the case of the Higher Education Act), whereby Congress reviews and either renews, terminates, or amends existing programs.

Regional Accreditation: Accreditation focused at the institutional level. Regional accreditation refers to one or more of the six regional accrediting agencies.

Regulations: After Congressional bills become law, federal agencies are responsible for putting those laws into action through regulations.

Title IV: Part of the HEA that addresses the administration of federal student aid programs including Pell Grants, federally guaranteed student loan programs, and the federal work-study program.

U.S. Department of Education: The arm of the federal government concerned with education quality and access nationally. There are several ways to refer to the United States Department of Education. This dissertation used USDE.

Organization of the Dissertation

The five chapters of this dissertation followed a standard progression starting with this introductory chapter that provides a rationale and purpose for the study. Chapter two presents current literature on the history of accreditation, the state of accreditation reform and related policymaking, key stakeholders, and the existing research on accreditation reform policy. Finally, this chapter includes a thorough explanation of Narrative Policy Framework (NPF), the theory used to frame the study. Chapter three focuses on the

methodology and study design and includes sections on data collection, data analysis, trustworthiness, and researcher positionality. Chapter four describes the findings from the examination of data related to each research question, and the analysis and interpretation of the research findings. Chapter five, the final chapter, presents the general conclusion and implications for practice, policy, and further research.

CHAPTER II

LITERATURE REVIEW

In the examination of how policy actors use public policy processes to influence accreditation reform, this literature review provides a comprehensive foundation for the study. This section begins with a brief history of accreditation. Accreditation of higher education has evolved alongside higher education (Brittingham, 2008) and has a varied and complex history. Accreditation had its beginnings in a voluntary process implemented by Harvard University in the mid-17th century and advanced over the next 300 years to a robust system of six regional accreditors with significant oversight and authority over higher education institutions.

Advancements within accreditation in the last two decades have come with significant criticism and calls for reform. This review includes an extensive overview of the key factors under fire. The first factor addressed is the criticism directed at the peer review process, an essential process used by regional accreditors. A second factor involves the role of accrediting agencies as the gatekeeper for the release of federal financial aid funding. This role situates accrediting bodies between two masters—the federal government and the institutions they accredit. Accreditors must meet the demands of the institutions they serve, as well as the demands of the federal government. These and other criticisms have created an adversarial environment, one that is rife with conflict and calls for new policy.

The Higher Education Act (HEA) reauthorization attempts during the 115th Congress defined the case for this study. This literature review provides a historical context of the HEA and the political influences of is origination. Since its initial writing in 1965, the HEA has undergone eight reauthorizations and two failed attempts. This section provides key information on these reauthorizations to provide a foundation for the case. Information on the political climate and key issues are included.

Public policymaking is a complex process and significantly influenced by politics. This review provides information on the political process, including the politics of policymaking, how policymakers create and implement rules within the field of higher education accreditation, and the role of key policy actors in the process. A review of existing research on policymaking concludes this section and includes examples of studies that address public policy overall, as well as studies that have examined the role of policy in higher education accreditation specifically.

Finally, the theoretical framework for this study is a public policy theory named Narrative Policy Framework (NPF). A relatively new policy theory, NPF acknowledges the influence of narrative in the development and implementation of public policy and rulemaking. The founders of NPF were interested in developing a theory with a postpositive perspective that addressed the social construction of reality found in policymaking narratives (McBeth, Jones, & Shanahan, 2014). This section provides readers with a deeper understanding of the framework and a review of the research that incorporates NPF as a framework.

Higher Education Accreditation

The field of higher education is self-regulated through a non-governmental accreditation system made up primarily of regional accrediting agencies. These agencies are part of a de facto triad system consisting of the federal government, states, and accreditors (Brittingham, 2009; Crow, 2009; Suskie, 2015). This section provides a brief history of U.S. accreditation and a review of the accreditation reform literature.

A Brief History of Accreditation

Higher education accreditation had its beginning at Harvard University in 1642 when administrators conducted a self-study and invited peer reviewers from Great Britain and Europe to evaluate the results (Brittingham, 2009; Davenport, 2000). The institution initiated this process because U.S. Founding Fathers ascertained the absence of federal regulation in higher education oversight. The Tenth Amendment charged states with the responsibility to charter new universities, but states provided little guidance after the initial approval (Brittingham, 2009). With the exception of the voluntary peer review at Harvard, few universities felt compelled to justify the quality of their educational services. The Land Grant or Morrill Act of 1862 changed the nature of higher education and created a culture shift. Higher education was now available to a larger population, not just the sons of the elite (Selden, 1960). Increased enrollment and social forces such as the rapid growth of industry, capitalism, and individualism, combined to create a unique system of higher education. This distinct system required a comparable system of accreditation that acknowledged the variety of educational offerings found in private universities, public research universities, and the new land grant institutions (Selden,

1960). U.S. accreditation policy would need to be flexible and able to address a wide range of institutions.

The resulting system of accreditation was comprised of regional non-governmental associations. Established in the late 1800s, the first regional accrediting agencies were membership organizations. Membership dues and fees supported the organizations and a system of self-regulation and independence emerged. These components remain as key attributes of accreditation today (Brittingham, 2009). Specifically, 1885 marked the beginning of the first of six regional accrediting agencies—the New England Association of Colleges and Secondary Schools (Andersen, 1978; Bemis, 1983). By 1917 an additional four regional accreditors came into being with the final accreditor making its appearance in 1962 for colleges in the west, the Western Association of Schools and Colleges (Andersen, 1978). Between these two bookends, the four additional regional accreditors are the Middle States Commission on Higher Education, the Higher Learning Commission, the Northwest Commission on Colleges and Universities, and the Southern Association of Colleges and Schools. Initially, regional accreditors simply provided a list of member institutions, and if an institution was on the list, it was accredited—no additional process was necessary (Orlans, 1975). Accreditors were regional because "distances were great, roads in rural areas had just begun, and long-distance phone calls were expensive" (Brittingham, 2009, p. 14). Current critics cite this historical rationale and suggest the need for regional accreditors is outdated.

With the Veterans Readjustment Assistance Act (GI Bill) in 1974, enrollments in higher education increased significantly, and higher education experienced its Golden

Age (Ewell, 2012; Geiger, 2011). The increased enrollment spurred the beginning of less reputable institutions and the decline of standardization (Selden, 1960). It was in 1952 when institutions first used the word accreditation to verify the legitimacy of an institution (Brittingham, 2009). Soon after, in 1965, the passage of the first Higher Education Act (HEA) increased federal financial aid significantly. One section of the legislation, Title IV, tied accreditation to an institution's access to this large pool of financial aid (Brittingham, 2009). The voluntary nature of accreditation was no longer fiscally possible—if an institution wanted to stay solvent, accreditation was a necessity.

The higher education climate changed again during the late 20th and early 21st centuries, triggering a shift in public opinion of higher education and the role of accreditation. College students became more diverse (Gaston, 2014; Suskie, 2015). For example, in 2016, 17% were parenting and 46% worked either full time or part time (National Center for Education Statistics [NCES], 2018a). Additionally, in 2016 48% of undergraduates were over 24 years old, compared to only 39% at the turn of the century. At the time of this study, students are also more racially and ethnically diverse. Data from 2016 on enrollment by ethnicity reported 54% of students enrolled in degree-granting institutions were White, 22% Black, 18% Hispanic, 5% Asian/Pacific Islander, and 1% American Indian/Alaska Native (NCES, 2018b). In comparison, ethnicity data from 2000 were 68% White, 11.3% Black, 9.5% Hispanic, 6.4% Asian/Pacific Islander, and 1% American Indian/Alaska Native (NCES, 2003).

College leaders increased resources to support all of these diverse factors, prompting increases in tuition rates. The higher cost of tuition and the decrease in state funding put more responsibility on students and families to pay for college, inciting

public skepticism of higher education (Sandmann, Williams, & Abrams, 2009;

Schmidtlein & Berdahl, 2011). With a greater percentage of their income going to tuition,

families focused increasingly on results. They asked institutions to "demonstrate that

their service is worth the cost" (Schmidtlein & Berdahl, 2011, p. 73). The 1992 HEA

allowed national and regional accreditors to accredit for-profit institutions, making these

institutions eligible for federal financial aid (Brittingham, 2009; Gaston, 2014). The price

of college was even higher for the thousands of for-profit colleges in the U.S. This

increase in borrowing led to increased default rates on student loans, creating a flurry of

discourse on the high levels of student loan debt in the U.S. (Looney & Yannelis, 2015).

All of these factors—dramatic change in student demographics, state defunding of higher

education, and the encroachment of for-profit colleges—contributed to a public loss of

trust in higher education (Rudder, Fritschler, & Choi, 2016). Critics were convinced

change was needed; for those policymakers and public officials looking to improve

higher education, "accreditation offered a tempting target" (Gaston, 2014, p. 83).

This brief history of accreditation would not be complete without the mention of

two additional milestones. The first is the Spellings Commission Report in 2006 (Bardo,

2009; Ewell, 2012; Gillen, Bennett, & Vedder, 2010; Neal, 2008). Then Secretary of

Education, Margaret Spellings, established the Commission on the Future of Higher

Education to research the state of postsecondary education. The final report was highly

critical of higher education, and positioned current accreditation policy at the center of

the problem (USDE, 2006). The report cited accreditors' failure to assure quality,

encourage innovation, contribute to competitiveness, and sustain rigor (Eaton, 2007). Still

reeling from the effects of the Spellings Commission, accreditors were forced to take a

second blow when President Obama, in his fifth State of the Union Address and corresponding report (White House, 2013), suggested the U.S. system of higher education accreditation needed to address quality and affordability. The report asked Congress to consider value, affordability, and student outcomes in higher education and went as far as to suggest the establishment of a new, alternative system of accreditation (White House, 2013). Higher education accreditation had evolved alongside higher education. Because higher education had come under fire, it could no longer take public trust for granted. Accountability for quality was falling on the regional accreditors. Moreover, critics of the accrediting agencies were numerous and persistent in advancing ideas for reform.

Accreditation Criticism and Reform

Criticism toward regional accrediting agencies came from government officials, policymakers, students and families, business leaders, special interest groups, and even the administrators and faculty of the institutions they serve. These stakeholders brought a variety of complaints and suggestions for reform. This section categorizes the criticisms into four areas: peer review, accountability, gatekeeping, and market forces. Each category includes a description, an analysis of the causal factors, and reform options.

Peer review. Regional accreditors in the U.S. maintained a cost-effective process for accreditation by using a peer review system consisting of all volunteers (Brittingham, 2009; Suskie, 2015). These individuals brought specific areas of expertise to the work. In addition to providing expertise and maintaining low costs, peer review teams contributed to the spirit of self-regulation and kept government out of the assurance business (Wergin, 2012). Positive outcomes of peer review included the dissemination of best

practices and the ability for accreditors to be responsive to the changing environment of higher education (Brittingham, 2008; Ewell, 2012).

Peer review is a common practice in many professions including the fields of law and accounting, because the knowledge and experience of professionals is necessary for a thorough audit or review (Fritschler, 2008). Critics of higher education accreditation, however, have identified the peer review process as unreliable for several reasons. Gillen et al. (2010) titled their research *The Inmates Running the Asylum? An Analysis of Higher Education Accreditation.* This title creatively described the authors' concern with the peer review process. Higher education peer review teams attempt to maintain collegiality, and provide their colleagues with quality improvement recommendations. Yet, these teams are extremely reticent to deny accreditation or deliver a significant sanction (Eaton & Neal, 2015). Peer reviewers often refrain from extreme penalties because they know their college or university will be the next one reviewed. Manning (2018) referred to this practice as a "daisy chain of kindness" (p. 22). Reviewer A will be kind to institution B in hopes that reviewer B will be kind to C, then C is kind to D who in turn is kind to A. Other researchers and authors address conflict of interest within the peer review process. Burke and Butler (2012) refer to "the fox guarding the henhouse" (p. 9), suggesting peer review teams are questionable as evaluators and are more likely to protect the interests of existing universities. "It's far easier and less painful to tell colleagues in other institutions what they need to do to improve than it is to tell them that, at the end of the day, they're just not good enough" (Wergin, 2012, p. 34). Neal (2008) took the argument one step further, suggesting that because peer review teams focus on quality improvement, they mislead the public into thinking accreditors are also implying quality assurance.

A broad, sweeping reform measure to address peer review was to eliminate regional accreditors all together. Gillen et al., (2010) determined the current system was highly flawed and attempts to reform it or fix it would not be effective. Neal (2010) agreed with this solution and suggested the implementation of standardized assessment criteria were needed that included data on recruitment, admissions, student body, complaints, financial capacity, default rates, student repayment rates, and learning outcomes. For reformers who wanted to keep the current system but make improvements, professionalizing the peer review system was the answer. Professionalizing peer review would include additional training for reviewers, the involvement of knowledgeable experts in place of generalists, and the inclusion of additional stakeholders to the peer review teams such as students, employers, and public policymakers (Crow, 2009).

Accreditation proponents suggested peer review was instrumental in maintaining a system of self-regulation for colleges and universities. Acting on recommendations to change this model would "seriously erode the successful self-regulatory enterprise of the past hundred years. Institutional autonomy, academic freedom, and peer review—hallmarks of our enterprise—would be sacrificed" (Eaton, 2007, p. 1). Higher education advocates believed institutions flourished in a climate of shared best practices and the collegiality of working with a team of peer reviewers throughout the accreditation process. Even with all these advantages, critics distrusted the process of self-regulation through a peer review process. Critics often paired their distrust of peer reviewers with the next topic—accountability. Reformers questioned how colleagues could truly hold one another accountable.

Accountability. As public trust in higher education weakened, stakeholders demanded higher levels of accountability and evidence of quality. During the Golden Age of higher education, 1945 to 1970, the public had great faith in higher education and its contribution as a public good. Funding and support were strong for higher education because of the existing belief that it served to perpetuate wealth and class along with providing social mobility for individuals willing to put in the effort (Newman, Couturier, & Scurry, 2004; Thelin, 2004). As states began to defund higher education, and tuition levels increased to make up for the difference, public support for higher education diminished (State Higher Education Executive Officers [SHEEO], 2018). Students questioned the increased financial burden and began to see themselves more as consumers. Students and families wanted to know they were spending their tuition dollars on a quality education (Gaston, 2014). In 2011, the federal government loaned $179 billion to students and families to finance postsecondary education (American Council on Education [ACE], 2012). Consequently, families and the federal government put pressure on regional accreditors to account for the quality of higher education output, taking the expectation of accountability to a new level (Gaston, 2014). Defining quality and determining how best to measure effective education proved challenging. Public officials at the state and federal level struggled to define specific outcomes related to a given college or educational activity (Schmidtlein & Berdahl, 2011). Outcomes such as graduation rates may or may not be indicative of quality in the classroom. Conversely, learning outcome mastery may or may not lead to employment.

The methods regional accreditors used to demonstrate accountability also came under criticism and were labeled as unacceptable in a climate of distrust. The Spellings

Report (U.S. Department of Education [USDE], 2006) stated that higher education had "a remarkable absence of accountability" (p. vii). The report suggested accreditors needed to provide students with more evidence of student achievement and institutional performance, ensure this evidence was easily accessed and understandable, and requested a means for comparing institutions (Eaton, 2010). Gillen et al, (2010) gave accreditors an "F" for quality assurance because the accreditation process did not define appropriate measures. Quality assurance is an elusive measurement. Blanco-Ramírez and Berger's (2014) quest for the definition of quality led them to determine that "quality needs to be analyzed in context and relation to other educational values such as access and relevance" (p. 92). Similarly, accreditors and critics were unable to come to consensus on benchmarks. Accreditors historically focused on inputs such as number of books in the library. At the time of this writing, accreditors had moved to outputs such as graduation rates and retention rates (Brittingham, 2009); however, accreditation reformers were demanding more.

To reform accountability measures in accreditation practices, critics put forth several options. One common suggestion was to increase the transparency of information. Crow (2009) suggested disclosure of institutional metrics such as job placement, cost, and accreditation sanctions were critical in the era of Sarbanes-Oxley, legislation that mandated strict reforms to protect financial investors. Crow (2009) continued to warn, "if accreditors fail to participate in a reasonable program of disclosure, they will choose to be irrelevant" (p. 89). Additionally, reformers recommended accreditors allow for comparisons among institutions on standardized performance measures and make all findings from accreditation reviews accessible to the public (USDE, 2006). An additional

recommendation designed to increase transparency was the incorporation of a gradated

system to accreditation ratings. Critics refuted the current model of either a yes or a no

for accreditation decisions. In place of a binary model, accreditors would assign approval

levels such as silver, gold, and platinum. These distinctions would provide students,

families, and policymakers with the ability discern differences in colleges and

universities (Alexander, 2015; Neal, 2008).

In considering accountability and how to measure quality in higher education,

Trow (1996) summarized, "education is a process pretending to have a measurable

outcome…Our impact on our students can never be fully known; it emerges over their

whole lifetimes and takes various forms at different points in their lives" (p. 321).

Regardless of accreditors' willingness or ability to define appropriate measures of

accountability, stakeholders continued to demand standardized and transparent outcomes.

Standardization can limit innovation and may not address the differences in institutions.

The outcomes suitable to a community college would be significantly different from

those of a Research I university. Accrediting agencies argued that transparency related to

how well institutions perform would undermine the primary goal of accreditation—to

promote self-improvement. Full disclosure would violate the safe space required for

institutions to be candid in their self-evaluation process (Brittingham, 2008). Accreditors

resisted transparency and preferred to provide confidential feedback, to avoid any

embarrassment on the part of the institution (Gillen et al., 2010). The balance between

accountability, trust, and transparency is complex.

Gatekeeping. The role of regional accreditors underwent a significant change

when the Higher Education Act (HEA) was legislated, authorizing Title IV financial aid.

Title IV designated accreditors as the gatekeepers for ensuring quality and the associated stamp of approval for an institution to receive federal funding (Brittingham, 2009). The unintended outcomes from this change in responsibility included compromising the *voluntary* aspect of accreditation and morphing accreditors from reviewers into enforcers (Alstete, 2006). Higher education institutions would have to close their doors if an accreditor withdrew Title IV funding due to lack of accreditation. Once accreditors became gatekeepers, they "essentially gained regulatory control over colleges" (Burke & Butler, 2012, p. 18). Institutions still saw accreditation review teams as colleagues, yet the federal government required them to be enforcers. These two roles were at odds, creating conflict that was unhealthy for accreditors (Alstete, 2006; Eaton & Neal, 2015). Described another way, collegial review teams supported institutions with quality improvement, while Title IV legislation stated they must address quality assurance. Ewell (2012) suggested quality improvement and quality assurance were important, but they were also at competing purposes. Quality assurance indicates a level of suitability with specific benchmarks. Quality improvement is an ongoing process that includes a self-assessment process, accreditor feedback, change implementation, and then re-assessment.

Reporting to these "two incompatible masters" was a challenge (Alexander, 2015, p. 2). The USDE required regional accreditors to address the needs of the institution, as well as the demands of the federal government. Accreditors came under significant fire for this role as gatekeeper. Neal (2010) used the following analogy, "a gatekeeping system using peer review is like a penal system that uses inmates to evaluate eligibility for parole" (para. 6). Two additional criticisms were related to the gatekeeping role. First, accreditors were extremely reticent to deny accreditation. Accreditors rarely considered

denial as an option because the outcome of losing accreditation was so significant. This professional norm provided subpar institutions the ability to maintain accreditation. Second, an organizational membership issue existed (Eaton & Neal, 2015). Dues paid by institutions funded regional accreditors, and included fees associated with accreditation activities. If an institution were to become unaccredited, there would be no more revenue from that institution collected by the regional accreditor (Burke & Butler, 2012). This conflict of interest contributed to the frustration critics described when they addressed their concerns with the current accreditation system.

Reform efforts related to the issue of gatekeeping emphasized the uncoupling of the gatekeeping role and accountability. As an alternative, reformers suggested that the federal government could replace the gatekeeping mandate with one of two new policies. The first would establish financial stability through a certification by an independent auditor, and would require institutions to post key information on student outcomes, default rates, normed assessments, and job-placements rates—all disaggregated by demographics (Alexander, 2015; Eaton & Neal, 2015). A second alternative to the current system of accreditation was to convert from a regional accreditation system to a nationwide system (Dickeson, 2003; Dill, 2014; Miller, Bergeron, & Martin, 2016). One way to achieve a nationwide system was to create a national accreditation foundation responsible for identifying and evaluating quality standards, improved public communication, and the responsibility for financial aid eligibility (Dickeson, 2003). Because it would have been a non-governmental foundation, the federal government would have remained detached. Critics suggested a second option, also separate from the federal government. They proposed a national agency (rather than a foundation) modeled

after international accreditation systems similar to Hong Kong or the European Balogna System (Dill, 2014).

Uncoupling gatekeeping from the accreditation process was a recommendation promoted most often by individuals and organizations outside of academic communities (Eaton & Neal, 2015). Brittingham (2008) suggested, "the major problem with breaking the federal link is that there is no reasonable proposal for an alternate system for assuring educational quality" (p. 38). A drawback of national models from other countries was the considerably higher cost (Brittingham, 2008). Additionally, the creation of an agency with the experience to manage the unique needs of the approximately 7,000 institutions in the U.S. would have been a significant challenge (Broad, 2015).

Market forces. Business professionals were some of the most vocal critics of higher education accreditation (Newman et al., 2004). Because market forces are at play in maintaining quality in the business world, there was an assumption that market forces would support quality in higher education. "Colleges and universities now operate in a competitive, global market. To survive, and certainly to excel, in this new environment, institutions need to be flexible, change quickly, and respond to market pressures" (Newman et al., 2004, p. 105). Market forces could work to maintain quality because, in a perfect world, market influences would force underperforming institutions out of the market as students make choices on where to attend college (Turner, 2017). An institution's reputation would determine quality assurance, and accreditation could return to its voluntary beginnings (Burke & Butler, 2012). Burke and Butler (2012) submitted that the force of competition is more powerful than the weight of accreditation.

A market-driven environment would not only encourage universities and colleges to address quality, but it would also improve innovation and receptiveness to the specific needs of businesses (Kirwan & Zeppos, 2015). A disparity existed between the perspectives of college administrators and business leaders related to the ability of institutions to be responsive. From a 2013 survey of chief academic officers at U.S. higher education institutions, 96% believed their institution "is very or somewhat effective at preparing students" for the workforce. Conversely, only one-third of American business leaders surveyed agreed these institutions were graduating students with the skills and competencies their businesses need (Jaschik & Lederman, 2014). Accreditation standards created a protective bubble for higher education institutions, preventing them from having to be responsive to student and market demands (Neal, 2008). For example, the federal government guaranteed funding so institutions did not have to compete for revenue, protecting them from the financial realities of a competitive environment. Because this funding ensured their sustainability, institutions were not motivated to invest in new programs to address industry needs.

Alexander's (2015) reform recommendations to address market demand and innovation included the creation of a new accrediting system for non-college providers of higher education. At the time of the writing of this literature review, organizations that provided alternative and innovative postsecondary offerings could not be accredited, and therefore, did not have access to federal Title IV funding. Examples of nontraditional offerings included coding boot camps, competency-based programs, and massive open online courses (MOOCs). Without these fiscal resources, many students could not take advantage of these options (Burke & Butler, 2012). Senator Alexander's examples

included using businesses, trade associations, and labor unions as organizations that could determine quality assurance for these new delivery models. Another recommendation was to move higher education to a market-based model and completely dissolve accreditation as a quality assurance mechanism (Burke & Butler, 2012; Eaton & Neal, 2015). The free market would be an improved method to provide public accountability for a college degree (Gillen et al., 2010). Newman et al. (2004) cited international examples of countries implementing a free-market model with an analysis of New Zealand and Australia. New Zealand benefited from more entrepreneurial institutions and additional student choice. Australia also experienced increased enrollments and improved equity for some underrepresented groups (Meek, 2002). The free market experiments in New Zealand and Australia also resulted in negative outcomes. These countries did not find that quality improved for all their institutions; instead, there was an increased gap between winners and losers, and increased costs to students (Newman, et al., 2004).

A market-based environment free of regulation could certainly influence quality. The question remained as to whether students are knowledgeable enough to make consumer-based decisions that would support the ousting of fraudulent institutions (Zemsky, 2005). Students typically did not have adequate criteria to evaluate the true quality of a degree. Most students only acquired one bachelor's degree in their lifetime. Because no secondary market exists for their degree, and the value of the degree may not be apparent immediately, it may take decades before students realized the true economic benefits of their degrees (Gillen et al., 2010; Nassirian & Harnisch, 2018; Zemsky, 2005).

These factors complicated the issue, and created an environment where market forces alone may not be enough to ensure quality delivery of education.

Summary

As stakeholders question the value of a higher education degree, accreditation must evolve to address the increasing concerns (Brittingham, 2009). One method used by stakeholders to stimulate change is through public policy and regulations. Eaton (2010) describes the difficulty regional accreditors have faced over the last two decades related to legislation. With all the criticism and calls for reform, policymakers have increased the number of regulations and the amount of policymaking associated with accreditation. The Higher Education Act (HEA) and its subsequent reauthorizations are examples. A review of the literature associated with the HEA and the political process follows.

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The Higher Education Act

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The HEA is the foundational piece of legislation that governs higher education in the U.S. It is a complex piece of legislation authorizing programs associated with federal aid, student support, and aid to strengthen teacher preparation and institutional quality. The original HEA consisted of eight titles, each with a specific focus. The eight titles in the HEA are:

- Title I—General Provisions

- Title II—Teacher Quality Enhancement Grants

- Title III—Institutional Aid

- Title IV—Student Assistance

- Title V—Developing Institutions

- Title VI—International Education Programs

- Title VII—Graduate and Postsecondary Improvement Programs

- Title VIII—General provisions for the law

Title IV is the section dealing specifically with accreditation. Policy actors often refer to Title IV as the central purpose, or "heart" of the HEA (Parsons, 2004). Title IV, and specifically Part H, define the role of accrediting bodies and how institutions are eligible for federal funding programs. It provides the legislative framework that defines the specific factors accreditors must oversee in order to carry out the accreditation process (Matthews, 2012).

Higher Education Act of 1965

President Lyndon Johnson initiated the Higher Education Act as a means to equalize higher education opportunities and provide access to college for more low- and middle-income students (Gladieux, King, & Corrigan, 2005). Entrenched in the 1960s and the civil rights movement, and following the land-grant movement and GI Bill, the HEA was federal policy that "embodied for the first time an explicit federal commitment to equalizing higher education opportunities" (Gladieux et al., 2005, pp. 174-175). Because President Johnson saw education as the great equalizer, the HEA legislation was key to unlocking the door for thousands of young men and women (Matthews, 2012). The underlying spirit of the legislation was a moral imperative to remove inequitable barriers (Gladieux, Hauptman, & Knapp, 1997).

President Johnson's successful implementation of the HEA was aided by the ability of the House and Senate to work together since the Democratic Party controlled both. From its initiation in 1965, each of the reauthorizations had a small group of policy actors who worked together on revisions. These individuals included Senators Edward

Kennedy, Robert Theodore Stafford, and Claiborne Pell. Pell and Stafford were

instrumental in student aid programs and two federal aid programs still carry their names

today, the Pell Grant and the Stafford Student Loan Program. Representative Nancy

Kassebaum and James Jeffords also worked across party lines to write higher education

legislation during this period (Parsons, 2004).

A formalized process to review and approve accrediting agencies soon followed

the HEA. The federal student aid associated with the HEA became a major source of

funding for institutions and was a growing federal investment. Because regulations

defining accreditation needed to take on more structure, legislators moved forward

quickly with the first reauthorization of the HEA in 1968 to shore up the accreditation

process (Ewell, 2008).

**Reauthorizations of the Higher
Education Act**

Reauthorizations of the HEA occurred in 1968, 1972, 1980, 1986, 1992, 1998,

and 2008. The first reauthorization in 1968 focused primarily on accreditation as the

vehicle to determine institution eligibility for receiving the increased influx of federal aid

(Ewell, 2008). The 1968 reauthorization legislation changed the relationship between

accreditors and the federal government. Once primarily a clerical role of tracking higher

education institutions, the accreditors now had a quasi-regulatory role (Pelesh, 1994). A

significant change in the next reauthorization of 1972 was the addition of federal funding

for schools with a postsecondary designation that included non-collegiate career

preparation and occupational education offered in community colleges and proprietary

institutions (Finkin, 1994; Hannah, 1996). The scope of oversight for accrediting

agencies expanded to include these additional institutions. However, applying the same

criteria for a new type of institution proved challenging. The stable world of traditional public and non-profit private degree-granting institutions relied on accreditation criteria that did not fit neatly when accrediting these nontraditional institutions.

The addition of proprietary and for-profit institutions to the legislation increased the amount of funding and the default rates of student borrowers. The 1986 reauthorization raised loan limits and interest rates, tightened loan disbursements, and improved collection procedures to address the problems (Hannah, 1996). However, it was not until the 1992 reauthorization when legislators fully addressed these issues (Finkin, 1994). College costs were now outpacing inflation and enrollment in proprietary schools had increased by a factor of five. The 1992 reauthorization was also the first one to receive significant influence from special interest groups, specifically trade and professional associations such as the American Council on Education (ACE), the American Association of State Colleges and Universities (AASCU) and the American Association of Community and Junior Colleges (AACJC). The intent of the 1992 reauthorization was to restore integrity to student aid and address the abuse and fraud that had resulted from the 1972 reauthorization (Finkin, 1994; Gladieux et al., 2005). For many participants, the process of the HEA of 1992 was a disappointment. It "converted higher education from a social good to a consumer product and paved the way for much greater federal regulation of academic quality" (Hannah, 1996, p. 524). The stage was set for a political environment that moved from legislative consensus to a dance between political officials and special interest group lobbyists.

Similar to the 1986 reauthorization, legislators used the 1998 reauthorization to patch current issues in higher education. This reauthorization addressed distance learning,

access for underserved populations, teacher education and recruitment, and worked to balance the forms of student aid (grants, loans, and work study). It continued to reinforce accreditation as the principal means of assuring quality in higher education institutions that receive federal aid (Matthews, 2012). It was the 2008 reauthorization, however, that made headlines again. Spurred by the Spellings report (USDE, 2006), the 2008 reauthorization included provisions for greater accountability and resulted in 29 new federal rules, all of which focused on accreditation (Eaton, 2010). This was the first major push to reform accreditation. "The growing public demand for increased accountability, quality and transparency coupled with the changing structure and globalization of higher education requires a transformation of accreditation" (USDE, 2006, p. 14). The new regulations addressed the peer review process, accreditation report transparency, credit hour calculation, employment rates of graduates (gainful employment), and the appeal process. The federal government "took over the decisions about what is best for the operations of the accreditor…diminishing the freedoms enjoyed by accrediting organizations and their institutions and placing the responsibility for quality in the hands of federal officials" (Matthews, 2012, p. 121). The 432-page 2008 HEA touches nearly every aspect of federal higher education policy with a focus on accountability and new expectations for accreditation (Matthews, 2012).

Matthews' (2012) review of the federal role in higher education accreditation and the effect of the three rounds of the HEA in 1992, 1998, and 2008 provided insight into the HEA reauthorizations through a public policy theory lens. Matthews used Kingdon's (1994) multiple streams theory to frame the analysis. Among many findings, the study suggests the greatest tension is between accreditation's primary responsibility as a

gatekeeper and the need for accreditors to assure quality assurance and ongoing quality improvement.

Reauthorization Failures

The HEA is typically reauthorized every four to six years. Therefore, the next reauthorization of the HEA was overdue in 2014. As of 2019, legislators had been unable to come to consensus, and a dearth of literature on the topic existed. Higher education news media reported on the recommendations and proposed legislation; however, I found limited scholarly research on the topic. Funding continued via annual authorizing of appropriations, but an update to the legislative action on higher education was still forthcoming at the writing of this study.

Judith Eaton, President of the Council on Higher Education Accreditation (CHEA), stated that the upcoming 2014 reauthorization was "a hugely high-stakes event for accreditation" and speculated that the soonest it would pass would be 2017 (Carlson, 2014, para. 4). Beginning in 1990, the Congress had experienced unprecedented partisanship, affecting its ability to pass legislation (Bump, 2016). The inability of Congress to reauthorize the HEA is a complex matter. An opportunity existed to better understand the complexity and to determine how policy actors influence the process. The next section provides additional information on the political process and the current climate of dissensus within the legislature.

<div align="center">

Political Process

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This section reviews the literature on public policy, policymaking, and the politics associated with the process. The review covers an overview of the public policy process

for new higher education legislation, information on policy setting, and relevant policy actors. In addition, I include a summary of current research in these areas.

Public Policy Overview

Public policy is defined simply as laws or regulations implemented to address a public problem (Howlett et al., 2009). Identification of public problems in higher education can come from a variety of sources. They may emerge after a crisis such as a reduction in funding, or policy actors may fabricate a problem to support their agenda (Protopsaltis, 2008). In addition to the U. S. Department of Education (USDE), laws affecting higher education come from the Department of Health and Human Services, Department of Labor, and the National Institute of Health (Hillman et al., 2015). Examples of legislation affecting higher education that originated outside of the Department of Education include the Violence Against Women Act (VAWA), Affirmative Action, and regulations related to the American Disabilities Act (ADA). Federal policies or laws originate from the three branches of the federal government. Legislation comes through Congress, administrative orders come from the executive branch (president's office), and judicial rulings come from the courts (Hillman et al., 2015).

Policymaking consists of several interrelated steps. Anderson (2003) outlines the five stages of public policymaking and Figure 1 provides an illustration. The first step is agenda setting. Several factors contribute to the emergence of an issue. As an example, individual citizens, interest groups, or government officials may persuade policymakers to address their concerns with a new or changing policy. The second stage of policymaking is formulation. At this stage, policymakers review competing perspectives

and wrangle with proposed solutions. Input comes from several stakeholders including government officials, trade associations, and research centers. Adoption and implementation are the third and fourth stages. Adoption represents the final decision on the new legislation or regulation and is followed by implementation. Implementation is what occurs after a bill becomes law. It encompasses everything done to carry out the law, to apply it, and to achieve the desired outcome (Anderson, 2003). The last stage in policymaking is evaluation. As in most processes, the designers of the legislation or regulation want to assess its effectiveness. This process is iterative and policymakers not only evaluate how well it works, but also cost efficiency and equity issues.

The Policy Process

Stage 1: Policy Agenda	Stage 2: Policy Formulation	Stage 3: Policy Adoption	Stage 4: Policy Implementation	Stage 5: Policy Evaluation
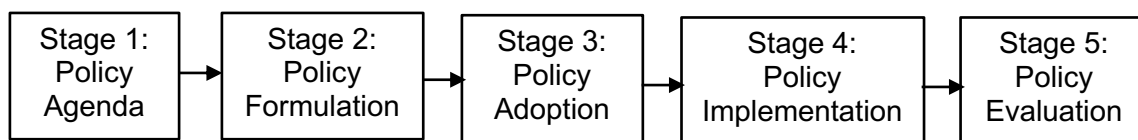
Figure 1. Policy process illustrated in five stages. Adapted from Anderson, Brady, and Bullock (1984).

Figure 1 illustrates a simplified model of the policy process and provides a foundation for this study. Other models describe a less-linear approach with arrow symbols that point in both directions to create a more complex model. Policymaking is a convoluted process in which phenomena and actors are constantly changing and influencing the various stages (Ripley, 2010).

This study centered on stages one and two—policy agenda setting and policy formulation. Scholars have identified several strategies policymakers use to set agendas. Policy agendas stem initially from problems. Identification of problems can come from a variety of sources including constituents, special interest groups, and societal trends (Gray & Lowery, 2000; Ripley, 2010). Conversely, in some instances, policymakers may

have a solution in mind for which they are looking for a problem (Stone, 1989). Because political officials have thousands of issues vying for their attention, extant literature is available on how policymakers drive policy agendas. Stone (1989) identified three routes for prioritizing a problem: 1) attitudes and resources of the policy actors, 2) the seriousness of the problem, and 3) the use of deliberate language to persuade. The media also influence agenda setting. Scheufele's (2000) study on media and policy setting suggested consumer media has little effect on telling the public *how* to think; however, it has significant effect on informing the public what to think *about*—what problems are most important now (Scheufele, 2000).

Relative to this study, additional research confirms Stone's (1989) identification of the deliberate use of language to influence policy setting. The use of narrative can be powerful when used by media, stakeholders, and citizens (Crow & Berggren, 2014). Kahan, Jenkins-Smith, and Braman (2011) found public opinion was highly influenced by narrative associated with individual values and less so by scientific research. This emphasis on language and narrative in the public policy process of agenda setting influenced the design of this study. Additionally, policymakers often capitalize on the importance of addressing values by aligning narrative with familiar story elements that includes the use of heroes, villains, dramatic struggles, and moral stakes (Kahan et al., 2011). Concerning policy formation—the collection, analyzing, and writing of policy— the influences are similar to policy setting (Ripley, 2010; Stone, 1989). Likewise, policy actors use causal stories and value laden narrative to persuade policymakers to adopt their solutions to the public policy issue (Anderson, 2010; Gray & Lowery, 2000; Ripley, 2010).

Politics of Policy

It is impossible to separate policymaking from politics; therefore, it is important to address the higher education political climate before exploring public policy research. Weible (2014a) states that there is a "continuous interaction between public policy and politics and the outcomes on society" (p. 13-14). Early scholars classically defined politics as "who gets what, when, and how" (Lasswell, 1936/1990, p. 853). In more finite terms, researchers define politics as the struggle to determine winners and losers, and the ability to find meaning and identity (Zahariadis, 2014). Lastly, Wildavsky in his seminal work on politics frequently refers to politics as the informal games and bargaining behind policymaking and suggests these factors are more important than the formal rules (Wildavsky & Caiden, 2004).

Political climate. In reviewing the higher education political environment during the decades prior to this study, researchers had identified a sea change in the overall climate. The Higher Education Act (HEA) of 1965 represented the first significant higher education federal legislation. Researchers described this era in politics as one of consensus, a time when a small group of policymakers created bipartisan legislation to promote higher education as a public good (Hearn & Holdsworth, 2004; Parsons, 2004; St. John, Daun-Barnett, & Moronski-Chapman, 2013). St. John et al. (2013), defined this time as the progressive period beginning with the end of the Great Depression and lasting through the end of the Cold War. The focus of higher education ideologies for conservatives was to promote classical education, science and technology and the promotion of economic growth. Liberals supported education for justice and social good

along with equal opportunity. The original HEA of 1965 and the 1992 and 1998 reauthorizations of the HEA dominated legislation from this period.

St. John et al. (2013) defined the following period as the global period. The first two decades of the 21st century represented a move away from higher education as a public good to a focus on markets and efficiency. A more significant attribute of the era, however, was a climate of dissensus and bipartisan politics (Hearn & Holdsworth, 2004). Parsons (2004) described the influences of the higher education policy arena in this new period: "highly partisan politics, ideological divides, retirements by major policy actors, shifting public opinion, demands for accountability, a declining trust in government, and a movement in emphasis away from equity in favor of privatization" (p. 213). The climate at the time of this study was marked by a distinct clash between conservative and liberal values, creating an environment of winners and losers (St. John et al., 2013). Hearn and Holdsworth (2004) suggested this environment was representative of the norm in politics, and the years of consensus that laid the foundation for much of higher education's policy was unique.

Incremental policy development. When political ideologies collide, progress is slow, and it is almost impossible to implement whole scale reform. This environment creates an incremental policy process, a term coined by Wildavsky in 1964 (Wildavsky & Caiden, 2004). Initially used to define the federal government budgeting process, incremental policy development results in small, incremental changes, rather than comprehensive change (Wildavsky & Caiden, 2004). Hearn and Holdsworth (2004), in referring to higher education incremental policy development, suggested these incremental changes were more likely to emerge when policy arenas experienced high

turnover of actors. An unfortunate element of incremental policy development is that insufficient resources are devoted to oversight and evaluation (Hearn & Holdsworth, 2004). Because changes are relatively small with minimal impact, policymakers rarely consider evaluation. Policy arenas naturally trend toward the status quo and incremental change; therefore, policy actors must exert extraordinary effort or significant conflict to achieve a major change (Baumgartner, Jones, & Mortensen, 2014).

In summary, politics matter in policy processes and outcomes. Politics are comprised of compromise and adjusting perspectives to find common ground among conflicting factions (Wildavsky, 2010). Policy actors face challenges in their ability to come to compromise and find consensus in the political climate at the time of this study. This environment of winners and losers provided a rich setting for policy process research within the NPF framework.

Policy Actors

Federal legislation can have significant impact on students, accrediting agencies, and higher education professionals. The involvement of a variety of policy actors is indispensable in policymaking as a number of stakeholders have a stake in the outcome. Participants in policymaking must have knowledge and resources that include technical expertise, the ability to mobilize others, and necessary resources (Kerwin & Furlong, 2011). Therefore, in most instances, participants are groups, organizations, and coalitions. Individuals are sometimes involved, but typically to a lesser extent (Kerwin & Furlong, 2011). The list of common participants and policy actors for this study included federal agencies, trade associations, special interest groups, research organizations, think tanks, foundations, and the mass media.

Federal agencies. Members of federal administrative agencies are important

actors in the higher education policymaking process (Hillman et al., 2015). The public

elects individuals as congressional delegates to serve in the House and the Senate. The

primary agency associated with higher education is the Department of Education

(USDE), but other departments are also involved. For example, the Department of

Veterans Affairs can influence student veterans and financial aid. The Legislative Branch

of the U.S. Government, namely Congress, is central to policymaking. Congressional

representatives from both the House and Senate write, discuss, and revise policy within

committees dedicated to key groupings of issues (Hillman et al., 2015). In the House of

Representatives, the committee responsible for higher education policy is the House

Committee on Education and Labor (HCEL). In the Senate, the committee with higher

education oversight is the Health, Education, Labor, and Pensions (HELP) committee.

These two committees are responsible for most of the legislation written to address

higher education and accreditation issues. Outside of these committees, other legislators

who have an interest in an issue may contribute to discussions and support of higher

education legislation.

Intermediary public policy organizations. Policy actors identified as

intermediary public policy organizations (IPPO) are groups that typically have an indirect

influence on policy. Termed intermediary, they occupy a space between at least two other

organizations providing any or all of the following: research, information, advocacy, and

funding (Orphan, Laderman & Gildersleeve, 2018; Scott & Jabbar, 2014). In their

research on IPPOs, Gandara et al. (2017) lumped all non-governmental policy actors

within this definition: thank tanks, philanthropic foundations, advocacy groups, and the

news media. For the purpose of this study, news media occupied its own category. The study of IPPOs suggests they can be instrumental in setting agendas and supporting policy change (Gandara et al., 2017; Miller & Morphew, 2017; Scott & Jabbar, 2014). Having emerged as major players in the higher education public policy arena, these organizations give voice to underrepresented student populations, bolster members' influence, and provide data (Orphan et al., 2018). The downside to the influence of IPPOs is they can also withhold information or disregard some research to advance their agendas (Gandara et al., 2017).

A group of influential IPPOs in higher education is membership-based trade associations. A number of higher education trade associations participate in policymaking (Lowry, 2009). Table 1 provides a list of the most prominent trade associations that support higher education.

Table 1

Trade associations in federal higher education politics

American Council on Education (ACE)
American Association of Community Colleges (AACC)
American Association of University Professors (AAUP)
Association of American Colleges and Universities (AACU)
Association of American Universities (AAU)
American Association of State Colleges and Universities (AASCU)
Association of Public and Land-Grant Universities (APLU)
Council for Higher Education Accreditation (CHEA)
National Association of Independent Colleges and Universities (NAICU)
State Higher Education Executive Officers (SHEEO)

(Lowry, 2009)

The trade associations displayed in Table 1 are quite active in the higher education policy arena. Examples of position papers from a variety of groups on a wide range of topics are easily accessible. As an example, CHEA published a position paper on regulatory relief for accreditation in April of 2017 to provide the then new administration with information on higher education accreditation regulation (Council for Higher Education Accreditation [CHEA], 2017). A second example is a 52-page report from ACE's National Task Force on Institutional Accreditation (ACE, 2012). It summarized the common criticisms of accreditation and then offered recommendations for improvement. The Bill and Melinda Gates Foundation supported the task force that wrote the report, and a university president and former president of the American Association of University Professors (AAUP) served as co-chairs. ACE serves as a strong advocate for higher education and is one of many trade associations representing the diverse mix of colleges and universities in the U.S. In the hyper-aware environment of accreditation reform, these trade associations play an important role. Without their ability to speak for colleges and universities as a group, individual institutions would struggle to find resources for lobbying and participation in the policymaking process.

Special interest groups comprise another category of IPPOs, and several special interest groups are active in higher education. Also referred to as pressure groups, they are important actors in policymaking because they often represent areas that would go unrepresented if not for them (Anderson, 2003). Often organized as foundations and funded by philanthropists, special interest groups "assert considerable influence on policy" (Howlett et al., 2009, p. 69). Furlong and Kerwin (2005) describe the activity and impact of special interest groups, citing how these groups may serve as a surrogate for

public participation and often see positive results in their favor during the policymaking process. Research conducted by McKay and Yackee (2007) found strong support for the researchers' squeaky wheel hypothesis, "when federal agency officials receive strong, loud, and united messages from interest groups, they are responsive" (p. 349-350).

In the early 1900s, the Carnegie and Rockefeller foundations were the first foundations to get involved in higher education and contribute to quality assurance practices. As an example, in 1955, Rockefeller "provided 630 liberal arts colleges with faculty salary improvement funds equal to each institution's total for the previous year" (Harcleroad & Eaton, 2011, p. 198). Donations of this size can drive institutional direction, creating significant influence on operations. Foundations active at the time of this research, and involved in higher education, included Lumina, Bill and Melinda Gates, the Koch Family Foundation, and to a lesser degree, the Markle Foundation, which focused on alternative educational initiatives. The work these foundations chose to fund contributed significantly to the direction of many higher education institutions and would "entice supposedly autonomous colleges to do things they might not do otherwise" (Harcleroad & Eaton, 2011, p. 199). The Lumina Foundation was committed to redefining accreditation in the U.S. with a national model. Lumina published their strategic plan for 2017-2020 and it included the creation of "an integrated quality assurance system for postsecondary learning" as a key goal (Lumina, 2017, p. 10). With the widening partisanship and associated lack of trust in government, special interest groups often felt they could be more effective in creating policy compared to traditional policy actors (Confessore, 2011).

Closely connected to special interest groups, another category of IPPOs is research organizations, also referred to as think tanks or knowledge broker organizations. The 21st century has seen a proliferation of think tank organizations. There are 120 private nonprofit research firms in Washington, D.C. alone and another 170 scattered across the U.S. (Anderson, 2003). Foundations fund many of them, demonstrating aligned interests. James (1993) defines a think-tank as "an independent organization engaged in multidisciplinary research intended to influence public policy" (p. 942). These organizations employ either full-time or part-time experts on various issues. Their research addresses policy problems and proposed solutions to public problems (Howlett et al., 2009). Research organizations may also exist at universities. These institutes tend to be bipartisan compared to public think tanks that reflect partisan interests (Howlett et al., 2009). Evidence suggests there is a wide range of ideological leanings and significant biases in the research produced by these organizations (Anderson, 2003). The challenge with think tanks is that they present as credible experts, regardless of their research methods and intentions (Haas, 2007). In examining reports associated with controversial policymaking, it is important to consider the source of data, reports, and white papers.

An example of a think tank that focused on higher education in general and accreditation reform specifically is New America, an organization that produces policy papers on education policy. In their own words, "we hope to help inform policy development by raising awareness of the public's attitudes, knowledge, and beliefs about higher education" (Fishman, Ekowo, & Ezeugo, 2017, p. 29). In reviewing New America's report on higher education accreditation, references consisted primarily of mainstream news outlets such as the *Wall Street Journal* and the *New York Times*, with

no references from peer reviewed journals. The Bill and Melinda Gates Foundation funded the report, and it reflected the direction supported by this foundation. Additional biased research organizations active in higher education partisan research are the Brookings Institute (progressive), American Enterprise Institute (conservative), the Center for American Progress (liberal), and the New America Foundation (independent) (The Best Schools [TBS], 2017). These organizations have significant influence on public opinion as mainstream media often quote them and many policy actors review their reports. If balanced with opposing views, however, think tanks can effectively provide views that contribute essential information to the policymaking process (Haas, 2007).

Mass media. For high profile issues, mass media is an actor in the policy arena, reporting on those public problems judged to have high public appeal (Howlett et al., 2009). Political officials are therefore sensitive to the information published in national news channels like *The Washington Post*, *Wall Street Journal,* and *New York Times* as these outlets can significantly influence public perception (Anderson, 2003; Haas, 2007). Mass media includes newspapers, news magazines, radio, television, and the Internet-based complements to these sources. These channels may not necessarily change policy, but they do influence opinions. Poor publicity can hinder or even stop policy from moving forward (Anderson, 2003). Haas (2007) found that if news media included the opinion of an expert or scientific data, news pieces were better able to sway public opinion. In addition, these media also influenced the public's perception of which sources are credible. However, Haas found that individuals the media identify as "experts" were more likely to be individuals willing to participate in an interview rather than the top

expert in the field. Additionally, policy actors that present problems to the media already packaged in a story are more likely to get airtime and have their views shared with the public (Callaghan & Schnell, 2001; Hermann & Chomsky, 1988).

Social media is a unique form of mass media. It shares many of the same characteristics as traditional media, yet has some unique attributes. The distribution of information is significantly different. Social media platforms rely on the "logic of virality," a distribution method more easily described as digital word-of-mouth (Klinger & Svensson, 2015, p. 1248). The likelihood of a social media posting *going viral* is low. An extremely limited number of posts receive viral attention, with most remaining unnoticed (Klinger & Svensson, 2015). Boynton and Richardson's (2016) study on the political use of twitter indicates social media's extended reach has added a new dimension to agenda setting. Now matching or exceeding the reach of television, there is still debate regarding its ability to persuade. In a chicken and egg debate, does mainstream media influence social media topics, or do grass-roots bloggers initiate the area of interest? Diehl, Weeks, and Gil de Zúñiga (2016) suggest individuals do not seek out political information media; however, there is evidence for an organic exposure to political information that may change or persuade opinions.

Many fields use specialized media such as journals, newspapers, newsletters, and websites to inform and influence constituents and policymakers (Anderson, 2003). In the field of higher education, two news channels widely distributed are *The Chronicle of Higher Education* and *Inside Higher Ed.* A generic search on the word "accreditation" resulted in 391 articles in the years 2015-2017 in *The Chronicle*, and over 500 articles from *Inside Higher Ed*. These publications have regularly provided information to

readers on the policy issue of accreditation reform and have cited experts, problems, and issues with accreditation. In his research on the news media's influence on education policy, Haas (2007) found "public acknowledgment of an education issue as a 'social problem' in need of additional resources appears to depend in part on the degree to which education is discussed or ignored by the news media" (p. 64). Several journalists from higher education publications go beyond reporting on the problem by also suggesting solutions to the problem (Howlett et al, 2009). The stories and narrative associated with accreditation reform are factors in policymaking and serve as sources of influence on policymakers. As an example, evidence suggests the media stories on student aid fraud contributed to the reauthorization of the HEA in 1992 (Hannah, 1996).

Mass media is one of the more complex policy actors (Callaghan & Schnell, 2001; Howlett et al., 2009). Designed to provide the public with accurate information, little evidence is available to show this is the reality. The impact of bias in the media is significant "considering that news reporting is not an objective mirror of reality, undistorted by bias or inaccuracy" (Howlett et al., 2009, p. 74). Mass media may be an influential policy actor on its own as political officials often use it for their own purposes through interviews, press releases, and leaks. Special interest groups, trade associations, and other groups use media to test the waters and to influence attitudes—sophisticated groups can use it to their advantage and easily counteract its negative influence (Howlett et al., 2009).

Advocacy Coalitions

In addition to specific policy actors, IPPOs can come together to advocate for or against policy through the formation of advocacy coalitions (Natow, 2013). Sabatier and Jenkins-Smith (1993) defined advocacy coalitions as:

> Actors from a variety of public and private institutions at all levels of government who share a set of basic beliefs and who seek to manipulate the rules, budgets, and personnel of government institutions in order to achieve these goals over time (p. 215).

Advocacy coalitions tend to be stable and are powerful groups united to influence policymakers and participate in rulemaking (Ness, Tandberg, & McLendon, 2015). Their common belief system defines their association and keeps them together (Howlett et al., 2009; Kirst, 2007; Natow, 2013). Advocacy coalitions are usually successful at influencing policy and may even recruit applied researchers and journalists to count among their members (Natow, 2013). Acting together, individuals have greater power as, "the political fortunes of actors tend to rise and fall with those of the advocacy coalition they belong to" (Princen, 2007, p. 18). Groups and networks like advocacy coalitions help individuals make sense of their worlds (Jones, McBeth, & Shanahan, 2014). In higher education, advocacy coalitions exist around several pertinent issues. This study examined advocacy coalitions associated with accreditation reform. Other examples include advocacy groups that focus on the completion agenda or on innovation with particular investment in competency-based education. In their research on interest groups in rulemaking, Furlong and Kerwin (2005) found 93% of interest groups used the formation of coalitions as a means to participate in policymaking. Additionally, 96% of interest groups reported it was an effective method.

Participation is foundational to the policymaking process. Individuals acting on their own, trade associations, higher education administrators, and advocacy coalitions all bring the necessary knowledge, interest, persuasive strategies, and belief systems needed to create the rules and policies that regulate higher education and accreditation.

Public Policy Research

Policy research and policy analysis are two ways to explore policy. Policy research is the exploration of the process of policymaking rather than on the specifics of a policy outcome. Policy analysis is the exploration of a specific policy and its affects. This study focused on policy research. Researchers with a focus on policy process research can better understand the broader impact of the process involved in policymaking.

The research on the policy process and policy development for higher education and accreditation at the federal level was minimal (Hillman et al., 2015; Natow, 2013). Conversely, a significant number of studies existed on the role of state politics and policy in higher education (Mawhinney & Lugg, 2001; Ness et al., 2015). Research on the role of state policy can serve to inform federal policy; however, because there are unique factors affecting accreditation reform at the federal level, a study of this nature was important. This section provides a sampling of existing research. The examples fall into three areas: federal policymaking, higher education policy, and accreditation reform.

General policymaking. Scholars have engaged in extensive research on the process of policymaking (Howlett et al., 2009; West, 2004). A seminal study on participation in policymaking is Golden's (1998) study that examined who participated in policymaking and the role of policy networks or advocacy coalitions. Findings suggest

agencies may not hear from everyone, and policymakers face challenges related to the arbitration of competing interests (Golden, 1998).

Interest group participation, especially in state policy setting, is a frequent topic of research, yet limited research was available at the federal level. One available study was Furlong and Kerwin's (2005) study of interest groups on federal policymaking that examined the influence of interest groups over a ten-year period. The major finding of this study was that interest groups have incorporated a wider and more diverse set of tools for participating in policymaking. Additionally, the researchers confirmed that interest group involvement is important. The studies on policymaking summarized here fall outside of higher education and accreditation. The next section focuses on research conducted specifically on higher education policy.

Higher education policy. In the last few years, higher education scholars have increasingly turned to the fields of political science, public policy, and economics to examine factors influencing the condition of higher education (Ness et al., 2015). Because there is significant legislation at the state level, state policy research dominates the research on higher education. The U.S. Constitution limits federal regulation of higher education; however, federal policy drives federal student aid and accreditation through funding governance. One available study examined the difference between K-12 education and postsecondary education federal policy (Lowry, 2009). Specifically, the study looked at how organized interests representing K-12 and postsecondary educational opinions differ, specifically around student outcomes. Lowry (2009) discussed the difference in organized interests such as special interest groups and advocacy coalitions. Findings indicated that the postsecondary HEA 2008 reauthorization regulations were not

as much influenced by businesses and unions, but by professional associations and accrediting agencies. This was in stark contrast to the special interest groups, namely businesses and unions, that influenced the K-12 No Child Left Behind (NCLB) regulations. Additionally, the regulations associated with learning outcomes in the postsecondary HEA regulations were defeated, while advocates were successful in moving forward with NCLB regulations and control over K-12 learning outcomes (Lowry, 2009).

Specific to higher education are two studies, one by Protopsaltis (2008) and one by McLendon (2003). Both studies used higher education federal policy processes to investigate the application of public policy theory. Protopsaltis framed his study on the interplay of several policy theories including multiple streams framework (Kingdon, 1994), punctuated equilibrium theory (Baumgartner & Jones, 1991), and advocacy coalition framework (Sabatier & Jenkins-Smith, 1993). Protopsaltis' extensive investigation of these three theories, and their ability to be useful in explaining state policymaking, resulted in the conclusion that multiple streams theory had a strong capacity to explain the policy under study, while the other two were moderate to weak. McLendon's study on policymaking patterns leading to the decentralization of higher education, informed readers on the rival theories of public policy—multiple streams theory, rational-comprehensive theory, and incremental theory. His findings also suggested multiple streams theory aligns with the unpredictable and ambiguous nature of higher education policymaking (McLendon, 2003). Policy theory "continues to be essential to the study of policy processes" (Weible, 2014b, p. 391). A final study by Natow (2013), explored the advocacy coalition framework with specific focus on the

beliefs of policy actors and the contexts that influence policymaking. Natow suggested the higher education policymaking process was more complex than what these theories defined. The study provided information on the power of policy actors and the strategies and tactics used. Additionally, Natow discovered the level of controversy associated with policies highly influenced the policymaking process.

Although scholars have not used NPF in a higher education policy setting, a study by Ertas (2015) used NPF in a quasi-experimental study to examine how narrative influenced public opinion related to charter school policy in the primary education environment. The findings from the study suggested, "policy narratives consistently influence individual opinion about charter schools" (Ertas, 2015, p. 441). Because of the empirical results on the influence of narrative, the researcher suggested narrative is a powerful tool for informing, as well as a potentially destructive strategy if misused (Ertas, 2015). These studies provided a model for advancing the research agenda of higher education policy and supported this study's examination of narrative policy framework as a theory to explore accreditation reform policy.

Accreditation reform. As this section focuses even more specifically on accreditation reform, the available research was more limited. Research organizations and regional accrediting agencies provided a significant number of reports on the current state of accreditation and recommendations for change; however, scholarly research was minimal. Pelesh (1994) conducted an early study that reviewed the rulemaking process used by the USDE on the regulations affecting accreditation from the Higher Education Act (HEA) of 1992. The HEA identified twelve areas related to regional accreditation. Pelesh analyzed the rulemaking process used by the USDE and provided insight into the

challenges and the failed implementation of the State Postsecondary Review Entities (SPREs).

As accrediting agencies worked to address criticism, several had implemented change. Jackson et al. (2010) conducted a study on the impact of new accreditation practices initiated by the Southern Association of Colleges and Schools (SACS) on institutions undergoing accreditation. Researchers found unintended effects from the new accreditation practices included increased scrutiny of instructional processes, faculty members' ability to facilitate learning, and a focus on student performance. The study results also indicated a "trend toward transparency, accountability, and student learning directs institutions to operate differently today than they have in the past" (Jackson et al., 2010, p. 18). Lastly, accreditation reform and the shifting alliances within the field provided a platform for Weissburg (2008) to apply and study the theory of multiple-principal theory. The study highlighted the challenges regional accreditors and institutions of higher education face in addressing the demands and needs of multiple masters.

Lastly, Cogswell (2016) explored the relationship between accreditors and institutions and how the relationship affected institutional outcomes. Principal Agency Theory (PAT) framed the study. The researcher used the theory uniquely by identifying the regional accreditors as the principal and the institution as the agent. In typical policy studies, the federal government serves as the principal and the accreditors as the agent (Kivistö, 2008; Lane & Kivistö, 2008). Public policy theory and accreditation reform converge in these studies; the findings from these researchers frequently suggest the need for additional research on the role of federal public policy as well as the need to refine

public policy theory. To better understand the public policy related to accreditation reform, this study used Narrative Policy Framework (NPF) as a public policy theory to frame the research.

Narrative Policy Framework

"If policy-making is a struggle over alternative realities, then language is the medium that reflects, advances, and interprets these alternatives" (Rochefort & Cobb, 1994, p. 9). Language has a variety of purposes. "Individuals use the narrative form to remember, argue, justify, persuade, engage, entertain, and even mislead an audience. Groups use stories to mobilize others" (Riessman, 2008, p. 8). Narrative inquiry is an approach to research identified by Creswell (2013) as a qualitative method used to capture information and data via stories told by individuals. Researchers gather stories through interviews, documents, and images. Researchers can extract data from stories in several ways. Identifying themes within stories is a common analysis method (Huber & Whelan, 1999), as well as the deconstruction of stories to analyze structure or format (Czarniawska, 2004).

In the field of policy analysis, McBeth and Shanahan (2004) embraced the idea of policy narratives as socially constructed stories and used the approach to pursue policy research (McBeth, Lybecker, & Husmann, 2014). Similar to Czarniawska's (2004) deconstruction of narratives, the founders of NPF demonstrated how researchers could use policy narrative elements, such as setting, actors, and character archetypes, to reliably quantify and measure how policy actors use narrative to influence policy beliefs. This type of structural analysis goes beyond what is said; it sets content aside and focuses instead on how the content is organized, how the story is told, and on an analysis of

common themes (Riessman, 2008). This review of NPF includes an introduction, a review of NPF form and content, core assumptions, information on its three levels of analysis, and a discussion of the limitations of the theory.

Foundation

Originally defined as a postpositivist theory, NPF examines narrative systematically to disaggregate narrative components and identify patterns to better understand how narratives shape public policy (Gray & Jones, 2016; Jones & Radaelli, 2015). The founders were interested in addressing social construction in policy theory and developed NPF through three foundational studies (McBeth & Shanahan, 2004; McBeth, Shanahan, & Jones, 2005; McBeth et al., 2007). Jones and McBeth (2010) officially named NPF in 2010 in an article that included an extensive history of the theory (McBeth, Jones, & Shanahan, 2014). NPF theory "starts with the assertion that the power of policy narratives is something worth understanding" (McBeth, Jones, & Shanahan, 2014, p. 225). Because storytelling is a seemingly universal means for communication and sharing reality, it follows that narrative is influential in the work of policymaking (Jones & McBeth, 2010).

Researchers grounded NPF in the ontological position that reality is socially constructed and narratives contribute to the construction of reality in the making of public policy (Jones & Radaelli, 2015; McBeth, Lybecker, & Husmann, 2014). NPF introduced one of the first postpositivist theories to policy process theory. In many ways, it was in response to the absence of postpostivism in Sabatier's (1999) seminal book on policy process theory. Postpositivism shifts away from the objective view of positivism to a subjective and constructivist view of reality. Crotty (1998) stated that the difference

between positivism and postpositivism is not one of quantitative or qualitative, but of how researchers perceive reality and the associated nature of research findings. Studies using NPF can be either quantitative or qualitative; however, NPF researchers all agree on the socially constructive nature of reality (Jones & Radaelli, 2015). Jones and Radaelli (2015) suggested NPF was "more nuanced than the positive/postpositive caricatured dualism often used to describe the framework" (p. 348). Although typically used by researchers with a postpositivist worldview, NPF scholars have also come from an interpretivist epistemology. Schwartz-Shea and Yanow (2012) described interpretive research as the study of humans as agents collaborating and constructing their politics while continuing to make meaning of what motivates actions. NPF and interpretivism share a common perspective on reality and the role of narrative and policy actors.

Form and Content

Policy researchers use NPF in a variety of settings with dependable results because the theory does not focus on the policy area, but on the consistent and recurring components that humans use in the creation of stories and narrative. NPF researchers have identified four elements essential to analyzing policy narratives (Jones & McBeth, 2010; McBeth, Jones, & Shanahan, 2014). NPF policy narratives must contain a setting, characters, plot, and a moral. As defined by NPF, these elements consist of the following (Jones & McBeth, 2010; Jones et al., 2014; McBeth, Jones, & Shanahan, 2014):

(1) *Setting:* Considered the stage for the narrative, scholars compare the setting to the props in a play. Typically, they are part of the background, but sometimes they become the focal point. In policy narrative, the economic conditions, legal characteristics, or other policy elements of the environment make up the setting.

(2) *Characters:* Consistent with the play analogy, characters are real or fabricated agents active in the story. NPF requires at least one character; however, there is often more than one. Researchers categorize characters as classic story archetypes of heroes, victims, and villains. Characters play an important role in understanding policy. They play out the experiences of victimhood, working as allies, and defending against enemies.

(3) *Plot:* NPF defines plot as the description of the action. It also establishes the relationships between characters. Examples of plots include decline, stymied progress, and change as an illusion.

(4) *Moral of the Story:* NPF suggests all narratives need to include a moral. Typically, the moral is the action taken by policy actors or the actual policy solution.

Researchers apply these core elements across different policy contexts (Jones & McBeth, 2010). NPF identifies these four basic elements as key to policy narrative; however, researchers may find relevancy with other common storytelling elements such as foreshadowing or flashbacks (Jones et al., 2014). The use of these NPF elements also varies between opposing sides. Winners and losers use characters differently and "vary in how they define victims and harms, attribute blame for the harms to villains, and promote different champions and policy solutions" (Gray & Jones, 2016, p. 195).

Core Assumptions and
Levels of Analysis

Central to most theories is a set of core assumptions used to guide researchers in determining the basis of the theory. Table 2 lists the core assumptions of NPF. From the five foundational elements summarized in Table 2, the fourth assumption provides NPF

researchers with focus by categorizing studies at three levels of analysis. These levels are

for purposes of narrowing the scope of a study and offering direction to researchers.

Additional information on each level follows the table.

Table 2

Core Assumptions for Narrative Policy Framework

Assumption	Description
Social Construction	Variable meanings are assigned to various objects or processes associated with public policy based on how humans perceive them. Suggests perceptions of reality may vary tremendously.
Bounded Relativity	The social construction nature of NPF creates different policy realities; however, the realities are not random, and such things as belief systems, ideologies, and norms bound them.
Generalizable Structural Elements	NPF uses the structure of plays (plots, setting, and characters) to create a specific, generalizable structure. It focuses on elements rather than context.
Simultaneous Operation at Three Levels	The theory divides research analysis into three interacting categories: *micro* (individual), *meso* (group and coalition), and *macro* (cultural and institutional).
Homo Narrans Model of the Individual	NPF assumes that humans and their stories are central to policy processes. People prefer to share information in story form, interpreting social problems in a narrative format.

(McBeth, Jones, & Shanahan, 2014)

The core assumption related to the three levels of operation is significant in

determining the focus of a research project. At the *micro* level, researchers are primarily

interested in the individual and how narratives inform or persuade people through policy

narratives (McBeth, Jones, & Shanahan, 2014). Methods at this level tend to rely on

surveys and quasi-experimental research designs (Gray & Jones, 2016; Shanahan et al., 2013). Common micro-level themes include how policy narratives impact individuals, exploration of positive responses to heroes, congruency between policy narrative and personal opinion, as well as the power of characters such as heroes, villains, and victims (McBeth, Jones, & Shanahan, 2014). Examples of studies include Ertas' (2015) study on how narratives related to charter schools influenced opinions. This quantitative study surveyed individuals before and after reading disparate opinion pieces to examine congruence and issue familiarity (Ertas, 2015). A second example is a qualitative study by Longaker (2013) that included interviews of individuals active in LGBT pride events in Brazil. The study focused on deep core beliefs and used Advocacy Coalition Framework (ACF) along with NPF.

At the *meso* level, researchers are interested in how groups use narrative within policy subsystems or advocacy coalitions (McBeth, Jones, & Shanahan, 2014). Methods used are typically the analysis of narratives produced by groups and coalitions with a focus on the types of strategies used to influence competing sides (Jones & Radaelli, 2015). McBeth, Jones, and Shanahan (2014) identified common strategies found in meso level policy narratives. An example of a meso-level study is the Crow et al. (2017) study of Colorado wildfire policy. This study analyzed local news media coverage to assess the problems identified in the narrative and the frequency of publication. Findings from the study suggested the timing of natural disasters has influence over policy processes.

At the *macro* level, where policymakers use narrative at the cultural level, there is a dearth of research and it has yet to be as developed as the micro and mesa levels (Crow & Lawlor, 2016). One study by Ney (2014) provided an example. The researcher

explored how macro-cultural narratives influenced social entrepreneurship. However, no other known studies were available at the time of this study.

Narrative Policy Framework narrative strategies. At the meso level, NPF scholars have identified three strategies: devil/angel shift, causal mechanisms, and scope of conflict (McBeth, Jones, & Shanahan, 2014). The first, the devil/angel shift strategy, identifies archetypical characters with which people can easily identify. In a devil shift, the policy story exaggerates the power of an opponent, suggesting they are villainous. An angel shift is a policy story that emphasizes a group's ability or commitment to solving a problem (Shanahan et al., 2013). Second, policy actors enacting the causal mechanism strategy create narrative that implicitly or explicitly tie events or individuals to the cause of an issue (McBeth, Jones, & Shanahan, 2014). Closely associated with the devil/angel shift, this strategy looks to identify responsibility or blame. Stone's (2012) work on narrative influenced the causal mechanism strategy. Stone (1989) identified four theories based on levels of actions (unguided or purposeful) and levels of consequences (intended or unintended). For example, if actions are purposeful and consequences unintended, Stone (1989) labeled the theory inadvertent cause as there is explicit intervening, but unforeseen effects. Finally, significant research has incorporated the scope of conflict strategy, examining how coalitions affect the scope of a narrative issue. NPF suggests if a coalition is losing, they work to increase the scope of narrative. If a coalition is winning, they contain the scope to maintain the status quo (McBeth, Jones et al., 2014). One example was the study conducted by Gupta et al., (2014) where researchers examined narratives associated with the politics of siting a nuclear power plant in India.

Researchers found advocacy coalitions strategically constructed narratives to achieve increased conflict (if losing) or limited narratives to maintain status quo (if winning).

NPF is a public policy theory founded in the belief that humans use stories as the primary way to communicate. In the process of policymaking, the stories told by policy actors play a critical role in the language used and the outcomes of policy and legislation. Jones and McBeth (2010) have advanced public policy theory by incorporating narrative into a framework that researchers can use to effectively analyze public policy processes.

Limitations of
Narrative Policy Framework

NPF emerged from the criticism posed by Sabatier (2000) regarding the lack of empirical foundation in the use of narrative as a source for research. NPF's founders addressed this initial criticism by developing an empirical postpositivist approach to the study of narrative in policy analysis (Jones & McBeth, 2010). Limitations of the theory include its inability to measure objective reality and its restriction on addressing a specific policy issue or context (McBeth, Lybecker, & Husmann, 2014). Additionally, because NPF originated as a quantitative framework, interpretivist researchers must slightly recalibrate the framework to service qualitative methods (Gray & Jones, 2016). Gray and Jones stated, "NPF was born of a merger of interpretivist theory and scientific method," and therefore its foundation lies in qualitative methods (p. 215). Additional research is necessary to determine if NPF is effective in studies outside of its original empirical postpositivist beginnings.

NPF is a relative new framework that researchers often describe as an "emerging framework" (Kusko, 2013; Shanahan et al., 2011). Because NPF is in its relative adolescence, several limitations correspond to this phase. First, most of the published

research originates from three individuals (McBeth, Jones, & Shanahan, 2014). A review of the literature results in the repetition of these three researchers and their associated support of the theory. Second, most of the studies have focused on environmental policy (Ertas, 2015). It is therefore important to see if the results are consistent in other contexts. Finally, gaps exist in the research related to the three levels of micro, mesa, and macro. There has been significant research at the micro and meso levels, but virtually no studies at the macro level (McBeth, Jones, & Shanahan, 2014).

Lastly, not all researchers value narrative and many are skeptical of its role in policy research (Shanahan et al., 2013). Critics suggest narrative may simply be "fodder entertaining the masses" (Shanahan et al., 2011, p. 536) and a product of the media rather than data used to research policymaking (Crow & Lawlor, 2016). A theoretical framework focusing primarily on narrative must first address the importance of narrative and its role in human communication and culture.

Summary

NPF scholars invite policy researchers to test the NPF hypotheses in different policy contexts to improve understanding of the central NPF research question: Do narratives play an important role in the policy process? (McBeth, Jones, & Shanahan, 2014). This study sought to use NPF as the framework to examine how policy actors use public policy processes to influence accreditation reform. Narrative is a powerful strategy. The use of a public policy theory that recognizes the influence of narrative achieves the goal of this study and serves to also evaluate the usefulness of NPF in explaining the role of narrative. By incorporating theory, researchers have an interference tool for mitigating bias, providing structure, and supporting reader comprehension.

Chapter Summary

This chapter opened with a brief history of accreditation to provide a basis for the study on accreditation reform policymaking. A review of the criticism levied at regional accreditors and the corresponding solutions and suggestions for reform followed. The chapter included background on the Higher Education Act (HEA) as it is the legislation used to define the case study. Information on policymaking at a general level, as it relates to higher education, and finally its role in accreditation compliance provided the reader with a foundation in policymaking. A review of existing research supplemented this foundation. Finally, a synopsis of the Narrative Policy Framework (NPF) provided readers with an overview of a public policy theory used by researchers to analyze the use of narrative in public policy process.

CHAPTER III

METHODOLOGY AND STUDY DESIGN

The objective of this study was to explore how policy actors use public policy processes to influence accreditation reform. This exploration included the examination of the policy actors who participate in policymaking, how these actors devise and strategically use narrative and stories, and the integration of NPF to frame the analysis of the narrative. This chapter steps through the research methods, theoretical framework, and the associated data collection and analysis strategies used for this study and its research questions:

Q1   How do policy actors use narrative strategies to promote accreditation reform as a priority issue?

Q2   How do policy actors use narrative archetypes to influence the formation of accreditation policy?

Research Design

This section defines the case study method I used to explore the study's research questions. Additional information on how I incorporated the theoretical framework of NPF to examine the research questions follows.

Case Study Method

The case study method is one of the most used methods in social science research (Yazan, 2015). Researchers can discover the details and application of the case method in three seminal books (Yin, 2009; Stake, 1995, and Merriam, 2001). Exploration of updated strategies related to the case study have been reviewed (Elman, Gerring, &

Mahoney, 2016); however, this study aligned with the traditional case study method since comparable policy studies continue to incorporate this approach (Crow & Lawlor, 2016; Gandara et al., 2017; Orphan et al., 2018). Numerous examples of case studies exist in public policy research. Studies relative to this research include Leslie and Novak's (2003) multiple case study of state governance reform efforts, and Crow and Berggren's (2014) case study on environmental policymaking that incorporated NPF. Several additional factors informed the choice of method. For this study, the following attributes of a case study aligned with the research: ability to answer "how" and "why" questions; a focus on what has gone unseen; capacity to handle a wide range of evidence; and an emphasis on the exploration of a social phenomenon. Research questions that ask "how" or "why" are candidates for case studies along with topics that focus on contemporary events (Yin, 2009; Merriam, 2001).

Additionally, case studies provide researchers with the ability to gain an in-depth understanding of a specific instance (Creswell, 2013; Stake, 1995). Because of this depth of exploration, researchers often "see what others have not yet seen" (Stake, 1995, p. 136). Additionally, one of the strengths of a case study is its ability to handle a wide range of evidence. Researchers implementing case study methods have used documents, artifacts, interviews, and observations (Creswell, 2013; Yin, 2009). The focus on narrative within this study also aligned well with a case study method. Stake (1995) reminds us that case studies can provide an opportunity to hear peoples' stories and seek to better understand them. Additionally, there must be a commitment to interpretation and the use of stories (Stake, 1995). Lastly, an important aspect of a case study is the interest in a social phenomenon examined through a specific example of that phenomenon (Yin,

2009). All these case study attributes aligned with the focus of this research study—the exploration of how policy actors use public policy processes to influence accreditation reform.

Several different forms of case study research designs are available. Some investigate only one case, while others investigate multiple cases (Creswell, 2013; Yin, 2009). This study employed a form of case study known as the embedded case study (Yin, 2009). An embedded case study is a singular case that analyzes more than one unit of analysis. An example of an embedded case study is a study designed around a specific program that has several individual grant funded projects within the program (Yin, 2009). This study explored the policy process associated with the reauthorization of the Higher Education Act legislation proposed during the 2017-18 federal legislative session. The subunits within this overarching case included the unique bills introduced by different legislators to address the reauthorization. Congressional leaders introduced two distinct pieces of legislation during the legislative session under study. Authors of the legislation included specific changes to the accreditation process in these bills.

Yin (2009) emphasizes the importance of incorporating theory into the case study research method and submits it is an essential component. Theory development within a case study serves to create a structure to the study and facilitates data collection. Yin shares, "the appropriately developed theory also is the level at which the generalization of the case study results will occur" (p. 38). The following section provides an overview of the study's theory. This theory provided a blueprint for the study that ensured a stronger design and improved data interpretation.

Theoretical Framework

For the purposes of discussing the research design, this section provides the specific attributes of NPF related to this study's research questions. NPF is a policy theory with a range of applications and three distinct levels: micro, meso, and macro (McBeth, Jones, & Shanahan, 2014). This study will use NPF at the meso level to examine the role of narrative used by groups and coalitions to influence policy issues. The meso level of analysis includes the following components as identified in Table 3:

Table 3

Narrative Policy Framework Meso Analysis Components

Component	Meso Level
Unit of analysis	Group/Coalition

Core NPF variables	Policy narrative
	  Setting
	  Character
	  Plot
	  Moral

Important theories	Belief systems Devil/angel shift Heresthetics Policy learning Public opinion Scope of conflct
Known applicable methods	Content analysis Network analysis Rational choice
Potential data	Written texts, Speeches, Videos

(McBeth, Jones, & Shanahan, 2014)

From the components in Table 3, this study examined policy narrative through the devil/angel shift and scope of conflict. Shanahan et al. (2013) described the devil/angel

shift as a concept used to analyze opponents and allies. The devil/angel shift strategy identified by NPF scholars has found that losing coalitions use the devil shift more frequently, and the winning coalitions' narratives reveal a greater use of an angel shift (Shanahan et al., 2013).

Additionally, I incorporated the scope of conflict strategy in the study. Several studies have examined how interest groups either expand or contain policy issues (McBeth et al., 2007; McBeth et al., 2010; Shanahan et al., 2013). When a coalition is in a losing position, it typically works to expand the scope of conflict. When a coalition is in a winning position, the opposite occurs—it works to contain the scope of conflict to maintain the status quo (McBeth, Jones, & Shanahan, 2014). McBeth et al. (2007) demonstrated one of the most reliable methods of examining scope of conflict by analyzing the distribution of costs and benefits in their study of Yellowstone policy debates. These researchers found, in the review of 105 documents related to a specific environmental policy issue, the coalition identified as the winner diffused benefits and concentrated costs to maintain status quo. The losing coalition concentrated benefits and diffused costs to expand the scope of the policy issue (McBeth et al., 2007). This study examined this strategy to explore the use of narrative in policy process and to contribute to the expansion of NPF theory through testing its predictability in an atypical field.

Data Collection

The study relied on document analysis of obtainable texts and transcriptions. Several public policy researchers have used public documents as the primary source of data. In Crow and Lawlor's (2016) study of environmental rulemaking across states, the researchers gathered and coded interview data and public documents to examine the

study's research questions. Natow (2015) used the actual rules and regulations themselves as documents, along with the public comments submitted, to study the process of USDE policymaking. A study with a slightly different approach was Miller and Morphew's (2017) study of higher education performance-based funding that included not only government and news documents, but also flyers and PowerPoint presentations. The selection strategies that follow resulted in the collection of 172 documents.

Identification of Coalitions

An initial task to pursuing the study of NPF and policy process in accreditation reform legislation was to identify the major policy actors involved in accreditation reform policy. To determine the key actors involved in this issue, I collected news articles and reports produced during the two years of the 115th Congress (January 2017 through December 2018), along with reports and testimony from key political officials who introduced and/or supported legislation related to accreditation of higher education during this time. I used a broad definition of policy actors, including think tank (or knowledge broker) organizations, special interest groups, foundations, political officials, journalists, and professional organizations. This search yielded a significant database of organizations. I then assigned organizations and their associated documents to a category: pro accreditation reform or accreditation status quo. Figure 2 illustrates the division of the 172 documents based on stance.
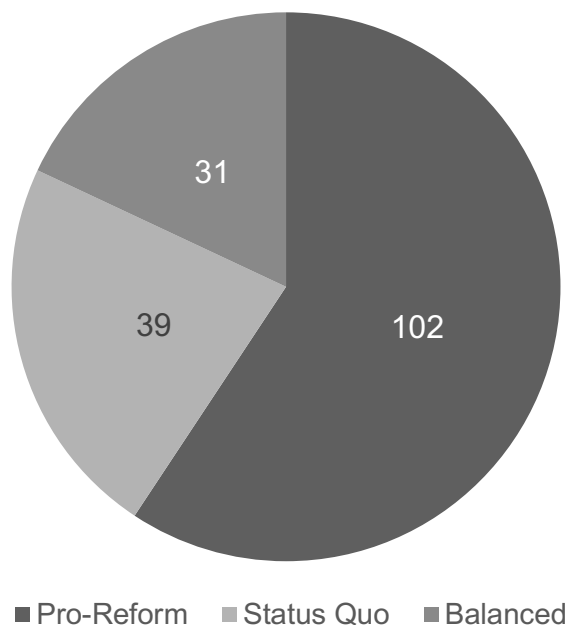
Figure 2. Document set composition based on issue stance.

The classification of documents based on stance resulted in 102 pro-reform

documents, 39 status quo documents, and 31 balanced documents as Figure 2 illustrates.

Examples of policy actors producing pro-reform documents included private foundations

active in the education arena such as the Lumina Foundation and the Bill and Melinda

Gates Foundation. Many political officials fell into this camp, as well as many of the

think tanks like the Center for American Progress and New America. Policy actors that

produced status quo documents included accreditation advocates such as the Council for

Higher Education Accreditation (CHEA), and trade associations such as the Association

of American Colleges and Universities (AACU) and the American Association of

Community Colleges (AACC). And finally, example policy actors that produced

balanced narrative included media sources such as *The Chronicle of Higher Education*

and *The Washington Post*.

I purposefully selected these sources for this study. Merriam (2001) explains that purposeful sampling within a case study "is based on the assumption that the investigator wants to discover, understand, and gain insight and therefore must select a sample from which the most can be learned" (p. 61). This broad list of policy actors, based on the criteria that they have shared narrative on higher education accreditation, provided a depth of information needed to examine the research questions.

Data Sources

Schwartz-Shea and Yanow (2012) stated, "the interpretive documentary researcher wants not just any text but *those that matter (or matters) to the agents under study* [italics in original text]" (p. 70). Documents identified for this study mattered to the individuals or groups debating accreditation reform. Data for this study came from three sources: (1) articles and opinion pieces from national mass media sources; (2) letters of support/non-support and reports from advocacy groups that include intermediary organizations and trade associations; and (3) government produced documents from federal agencies and members of congress, including transcriptions of oral testimony. I describe each of these sources in more detail below, along with the strategies used for document selection.

Finding relevant material was the first step in the process of analyzing documents to address the research questions. In considering documents for use in this study, I followed the ideals cited by Merriam and Tisdell (2016) that included the need to determine the authenticity of documents by questioning: Is the document complete? Who is the author? What is the goal of the author? For whom was the document intended? What were the writer's sources of information? What is the author's bias? I analyzed

each document reviewed for this study for authenticity and notes recorded based on these questions. Documents came from mass media channels, advocacy and intermediary organizations, and from the federal government.

  Mass media. Mass media channels play a role in persuading public opinion and influencing legislators. For this study, the selection criteria for media channels included the requirement that the channel reach a national audience, it regularly publishes articles on higher education, and was considered a reputable source. I started by incorporating the data used in Otero's (2018) national media bias chart. The media bias chart was available in Excel and I sorted the data by the quality index as well as the neutrality index to find the top 25 sources. To ensure that higher education was a recurring topic for the sources, I conducted a key word search on higher education within each source. I included sources with a minimum of 150 articles naming higher education during the one-year timeframe of January – December 2017. The six news outlets that met these criteria included: *The New York Times*, *PBS News, Politico, The Hill, The Wall Street Journal*, and *The Washington Post*. In addition to these national media channels, the national higher education news media publications, *The Chronicle of Higher Education* and *Inside Higher Ed,* were included. Criteria for the selection of higher education news media included a search on the keyword accreditation that resulted in 100 or more articles in 2017. For each of these news outlets, I accessed their respective websites, conducted the keyword search on accreditation and quality assurance using the site's search function, and downloaded news articles and opinion pieces as PDF documents for inclusion in NVivo for coding and analysis.

Advocacy and intermediary organizations. In the policymaking arena, many intermediary public policy organizations (IPPOs) were active in producing reports related to issues they support. Think tanks, also known as knowledge broker organizations, are one type of IPPO. University of Pennsylvania library guides (University of Pennsylvania, 2018) published a list of public policy research think tanks in the U.S. I used this list in the selection of the IPPO think tanks to include in this study. From the top 50 think tanks, I first evaluated each one for their interest in higher education issues. Second, I looked for a minimum of three (3) source documents related to accreditation within the two-year period of this study. Based on these criteria, Table 4 lists the IPPOs I selected.

Reports from the IPPOs in Table 4 were available via their organizational websites. I used the search feature within these websites to search on accreditation and quality assurance to identify the documents. Once identified, I downloaded the documents as PDFs for inclusion in NVivo. These reports contained relevant information in narrative form about the actors and strategies associated with accreditation reform and the reauthorization of the Higher Education Act. *Varying Degrees, New America's Annual Survey on Higher Education* is an example of a report from the think tank New America (Fishman et al., 2017). This report criticized the role of accreditation and suggested regional accreditors inhibited educational innovation. Additionally, I analyzed reports from special interest groups and think tanks that provided views on accreditation reform and contributed to the promotion of accreditation reform as a significant policy issue. Reports were limited to the two-year period identified within the case study.

Table 4

Think Tank Intermediary Public Policy Organizations and Associated Key Funders

Ranking	Think Tank IPPO	Key Funders
1	Brookings Institute	Steve & Roberta Denning Foundation Bill & Melinda Gates Foundation The Hutchins Family Foundation
4	The Heritage Foundation	Members Koch Family Foundation
7	Center for American Progress	Ford Foundation Bill & Melinda Gates Foundation The William and Flora Hewlett Foundation The Hutchins Family Foundation W.K. Kellogg Foundation
11	Urban Institute	Bill & Melinda Gates Foundation Ford Foundation John D. and Catherine T. MacArthur Foundation Rockefeller Foundation
14	American Enterprise Institute	Raikes Foundation Koch Family Foundation
43	New America Foundation	Bill & Melinda Gates Foundation Siemens Foundation

Trade associations provide input into the policymaking process of higher education. I included all trade associations associated with higher education (see Table 1 in Chapter 2) in the study. Documents from trade associations were typically briefs or letters of support or non-support. A review of trade association websites provided access to these letters and information provided on behalf of their members. A keyword search on the sites' search engines resulted in the identification of these documents. I downloaded the letters and opinion pieces as PDFs and uploaded them into NVivo. I

included the narratives that addressed accreditation reform in the data analysis.

Additionally, these organizations frequently provided public comments on legislation

associated with higher education accreditation and I also included this input in the study.

These documents came from the search I conducted of government-related sources. I

excluded state or regional organizations (e.g. Midwestern Higher Education Compact

[MHEC], Western Interstate Commission for Higher Education [WICHE]) to minimize

regional influences and maintain a national focus.

Finally, large foundations influence policy formation and agenda setting through

grant making. Barnhardt (2017) suggested higher education was in a period of giving

reminiscent of the days of Carnegie and Rockefeller. The Lumina Foundation, Bill &

Melinda Gates Foundation, Ford Foundation, and Koch Family Foundation led giving in

higher education based on the frequency of their funding in the IPPOs identified for this

study. In reviewing the associated foundation websites for narrative, the only foundation

who published under their own name was the Lumina Foundation. This study included

three (3) documents from the Lumina foundation. These documents were all coded as

IPPOs and were associated with the pro-reform coalition. All other foundations served as

funders for the think tanks identified as IPPOs. I included tracking of these foundations

during the coding process because they actively funded many of the advocacy

organizations focused on higher education and accreditation reform.

Government documents. In lieu of interviews (a typical source of data for

qualitative studies), I analyzed oral narratives from legislative testimony, hearings, and

debates. Congress.gov, the official website for the U.S. federal legislature, provides

access to information from members of Congress and legislative agencies. This site

provided access to the transcripts and recordings necessary to include oral narrative data in this study. I captured data from the Department of Education (USDE); the House Committee on Education and Labor (HCEL); and the Senate Committee on Health, Education, Labor, and Pensions (HELP). I searched the websites for the department and the committees to access these documents. I downloaded each document as a PDF and imported it into NVivo. In addition, the social networking site, YouTube®, provides channels for congressional leaders to share their activities. For example, Representative Virginia Foxx, author of the PROSPER Act, has a YouTube channel that includes video clips of her congressional activities, as does Senator Alexander, who frequently speaks out regarding higher education and accreditation issues. These videos had associated transcripts that I downloaded from the YouTube site and saved as a Word document and imported into NVivo. I reviewed oral narratives regarding higher education accreditation legislation and policymaking from this site within the timeframe of the 115th Congress, January 2017 through December 2018.

Finally, I included transcripts of testimony from relevant legislative hearings. These documents encompassed discussion and testimony associated with the PROSPER Act and the Aim Higher Act as related to accreditation reform. These documents were also available on the congressional committee websites. I accessed these websites, used their search function, and downloaded the hearing and testimony documents. The documents included comments from political officials and field experts testifying on behalf of the HEA reauthorization legislation associated with higher education accreditation. An example of such a document is the Report of the Committee on Education and the Labor together with Minority Views (U.S. Government Publishing

Office, 2018) that provided a response to the HEA bill authors. Figure 3 provides a

breakdown of the 172 documents based on source.
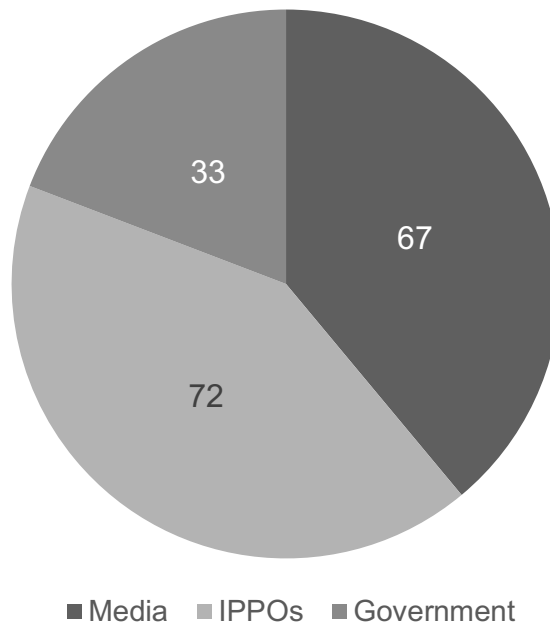
Figure 3. Document set composition based on source.

Rules of inclusion. I applied the following criteria to all documents identified

from all sources as identified in Figure 3 (mass media, intermediary public policy

organizations [IPPOs], and government documents):

1. Date range of January 1, 2017 – December 31, 2018;

2. Discoverable on the search terms of accreditation, accreditor, accredit,

    PROSPER Act, Aim Higher Act, HEA reauthorization; and

3. Presence of one of the following terms within the document: accreditation,

    accredit, quality assurance.

The criteria resulted in 67 documents from media sources, 72 from IPPOs, and 33 from

government-related agencies or individuals. Because the HEA reauthorization legislation

was complex and included topics outside of accreditation, it was important that all

documents included a mention of accreditation or quality assurance to ensure they contributed to the focus of this case study.

Data Analysis

"The search for meaning often is a search for patterns" (Stake, 1995, p. 78). The analysis of the case study documents began with coding and the identification of common patterns. I conducted an initial reading of all narratives for overall comprehension. As a next step, I went through the documents and coded for analysis. Coding provides a system to facilitate the analysis of narrative data and to identify patterns and themes across documents (Merriam & Tisdell, 2016; Patton, 2014). Codes are often a word or a short phrase that symbolically represent a theme or narrative element.

I used inductive and deductive analysis strategies for the collected documents with the assistance of the qualitative software program NVivo. The deductive coding included traditional NPF policy narrative codes: costs, benefits, winners, losers, and archetypal characters. Following the principles of interpretivist strategies (Schwartz-Shea & Yanow, 2012), I also inductively reviewed document content for emerging patterns, themes, and concepts. In addition to NPF coding, I analyzed the documents for additional trends such as frequency by category, differences in approach prior to the release of the legislation versus after the release (the PROSPER Act was introduced in December of 2017), and differences based on funding (where applicable). I labeled documents by category (mass media, intermediary organization, and government) as well as by issue stance (pro-reform, status quo, and balanced).

Coding Schema

Research question 1 asks: *How do policy actors use narrative strategies to promote accreditation reform as a priority issue?* The hypotheses associated with question one suggested a difference existed in how opposing coalitions affect the scope of the conflict. NPF proposes that the representation of costs and benefits are key elements in identifying whether policymakers are looking to expand the scope of the issue or contain it to maintain the status quo. Modeled after the work of Gupta et al. (2014), I used the coding schema outlined in Table 5 to code all documents. I read the narrative and identified phrases that symbolized the following themes: winners, losers, a few gain, many gain, a few pay, many pay. For example, the statement "the reality is that costs of regulation are almost always passed on to consumers in the form of higher prices" (Kirwan, 2017), was coded as many pay. If a narrative mentioned a significant number of individuals or dollars, it was coded with many pay or many gain depending on the emphasis. Identifying winners and losers proved to be more challenging. Typically phrases that were associated with victims were also identified as losers. I used the winner code when a beneficiary was identified. For example, the phrase "empower America's working families to succeed in our economy" (Committee on Education and the Workforce Democrats [CEWD], 2018) was a phrase coded as winner.

Once the coding process for question 1 was complete, I conducted an analysis of the codes. Strategies used by winning and losing coalitions were interpreted based on the identification of winners, the identification of losers, the distribution of benefits, and the distribution of costs. I also analyzed the documents based on the date of production to determine if it contributed to the prioritization of the issue.

Table 5

Coding Schema

Document Codes	Code Option 1	Code Option 2	Code Option 3
Document stance	Pro-Reform	Status Quo	Balanced
Category	Mass Media	Intermediary Organization	Government
Coverage	PROSPER Act	Aim Higher Act	General
Funding (if applicable)	List funder from identified list: Lumina Foundation, Bill & Melinda Gates Foundation, Ford Foundation, Koch Family Foundation		

NPF Strategy Codes			
Narrative identifies either a specific winner or loser	Loser	Winner	Neither
Narrative describes benefits of the proposed reform	Few Gain (concentrated benefits)	Many Gain (diffused benefits)	
Narrative describes costs of the proposed reform	Few Pay (concentrated costs)	Many Pay (diffused costs)	
Archetypal character identified (can code for more than one)	Hero	Villain	Victim
Name of character	For example: victim-student, villain-predatory institution, hero-legislators, etc.		

Kear and Wells (2014) used NPF to explore the defeat of Ohio Senate Bill 5.

Their strategy looked at the role of villains, heroes, and victims in the narrative associated

with a change in collective bargaining regulations in the state. The strategy used to

analyze documents associated with this contentious state issue aligned with this study's

second research question. Also outlined in Table 5, these codes supported the exploration of how competing coalitions use villains, heroes, and victims through NPF's devil/angel shift strategy to influence policymakers as policies are either signed into law or die. To explore the second research question in this study, *how do policy actors use narrative archetypes to influence the formation of accreditation policy,* I coded documents to determine the presence of archetypal characters. Themes coded were: identification of villains, heroes, and victims; and to whom does the document name each of the characters (e.g. students, institutions, legislators, etc.). For example, in a USDE (2018b) document, several phrases identified students as victims, including "we know students are having poor experiences" and "they represent students 'in distress' with very real implications for our economy and our future." I found the identification of archetypes to be relatively straightforward because there was consistency in the entities identified. Finally, I also coded documents related to HEA legislation with codes that identified the specific bills (PROSPER Act or Aim Higher Act). I applied these codes at any mention of either bill.

Analysis Strategies

To answer the first research question, *How do policy actors use narrative strategies to promote accreditation reform as a priority issue?* I analyzed the number of documents identified as status quo and compared the results to the documents identified as pro-reform. I did not include documents from the balanced coalition in the analysis. The documents coded with many gain (diffused benefits) versus few gain were assessed along with the number of documents coded with many pay (diffused costs). These codes, defined by NPF, indicated how winners and losers either contained the scope or expanded

the scope of the issue, confirming the use of the NPF scope of conflict strategy. I then categorized the documents based on production date to determine if there was a difference in the number of documents released prior to the introduction of the legislation (indicating issue prioritization strategies). Finally, I reviewed the documents based on source category (media, IPPO, or government), analyzing for the frequency of documents from each stance (status quo or pro-reform).

To answer the second research question, *How do policy actors use narrative archetypes to influence the formation of accreditation policy?* the coding associated with archetypal characters was analyzed. I calculated the ratio of heroes to villains for status quo and pro-reform documents and disaggregated the results based on source (mass media, intermediary organizations, and government) as well as by date—examining if there was a difference once the legislation was introduced (data prior to the introduction of the PROSPER Act versus after). Once again, I did not include documents from the balanced coalition in this analysis. I then collected and analyzed the names of heroes, villains, and victims to determine if trends existed. These results indicated whether the NPF strategy of the devil/angel shift was incorporated into the formation of policy as indicated by the inclusion of accreditation reform within the legislation.

Trustworthiness and Positionality

Trustworthiness

I addressed trustworthiness in this study from the point of view that qualitative research pursues different goals than quantitative research and therefore has unique criteria for evaluating trustworthiness (Jones et al., 2014; Merriam & Tisdell, 2016). Schwartz-Shea and Yanow (2012) suggest the positivist standards of validity, reliability,

and replicability are "ill-suited to interpretive research" (p. 94). The standard view of

reality from positivist researchers suggests there is a *real* meaning to data. This

perspective conflicts with an interpretivist study that approaches social phenomena that

are "dynamic and fluid" (Schwartz-Shea & Yanow, 2012, p. 94). Identifying strategies to

address trustworthiness in qualitative studies typically address transparency,

dependability, and engagement with positionality (Jones et al., 2014; Schwartz-Shea &

Yanow, 2012).

Creswell (2013) begins the conversation around qualitative trustworthiness with

several questions. These questions include:

- Is there sufficient raw data presented?

- Are there a sufficient number of data sources?

- Is the point of view of the researcher apparent?

- Are personal intentions examined?

These questions provided a framework for addressing the trustworthiness of this study.

First, it was important to ensure a sufficient amount of data were collected. The

researcher should feel as if he or she has hit a point of saturation (Merriam & Tisdell,

2016). Yin (2009) described saturation as the point in which data are "exhaustively

covered" (p. 160). In addition to saturation of data, qualitative researchers must

purposefully seek out inconsistencies or gaps in the data (Schwartz-Shea & Yanow,

2012). This transparency is a second component of trustworthiness. Creswell (2013)

identified the need for transparency in the revelation of the researcher's point of view. In

addition, it is also important to provide transparency in the researcher's reasoning and

selection of methods (Schwartz-Shea & Yanow, 2012). For this study, data saturation

resulted from extensive collection of data in the form of documents from a wide range of sources along with a significant assemblage of oral narratives. Steps taken to ensure transparency included the detailed strategies outlined in the methods section and the forthcoming findings section that highlight the process for interpretation and analysis. The final two questions posed by Creswell (2013) relate to the importance of positionality and reflexivity. The following section covers these key components of a trustworthy qualitative study.

Positionality and Reflexivity

In keeping with the protocol for qualitative studies, it is important for the audience of this study to have at least a general understanding of my position as a researcher and my relationship with the topic of this study. To create a sense of trustworthiness, it is important to know the experience, background, and worldview from which this study originates and the motivation for pursuing this study. At the time of this research I was employed as a higher education professional and had worked within higher education since 1994. I worked as an administrator in a community college and had worked on two accreditation visits at two different institutions. The five years between the two visits resulted in an observation about the increased degree of regulations and need for compliance. Both institutions completed the accreditation visits through the Higher Learning Commission, and it was clear that in the five years between visits there had been significant changes in the field. This observation led to my interest in examining the influences to regional accreditors, accreditation reform, and ultimately the public policy aspects. In chapter one, I referenced Schwartz-Shea and Yanow's (2012) perspective on finding the balance between being a stranger (outsider) and being

familiar (insider). At the time of the study, I was an obvious insider on the topic of higher

education and accreditation.

In contrast, when I embarked on this research, my experience with public policy

was minimal. Therefore, I brought an outsider perspective to this study when reviewing

public policy processes. While an outsider perspective can create certain limitations, it

can also provide a study with important strengths. Because of my outsider perspective, I

was more likely to bring a neutral perspective, having no previous bias, to the findings

related to policy processes. I was a curious beginner, learning about how policymakers

initiate legislation and the resulting regulations that contributed to the compliance work

of higher education.

My previous research reflects my interest in theory. Having participated in writing

articles with colleagues and my own research, I uncovered a passion for theory. As I

explored a variety of public policy theories, the notion of looking at narrative was an

obvious fit with my interpretivist worldview—that the very nature of our reality is

socially constructed and what better way to interpret it than through our stories and

narratives. Jones et al. (2014) states, "readers of your work should never lose sight of

your epistemological and theoretical perspective because it should be evident in all

aspects of the research design" (p. 72). The design of this research, the integration of the

theoretical framework, and the process for analysis were all representative of my

experience, biases, interests, and desires.

Lastly, to address how my positionality interacts with the data and analysis in this

study, I share here how who I am could influence my evaluation of the data and the

resulting findings. I am a white female, I hold a relatively high position within a higher

education setting, and I was a first-generation college student. The first and second identities bring with them implicit privilege that is sometimes outside of my awareness. Colleagues typically respect my opinions and I feel safe in most environments. In contrast, my identity as a first-generation student position me as feeling less-than, of not fitting in, and having a sense of having to "catch-up." There is also a general sense of lack of social capital. I question how to act, how to dress, and how to network with ease. Even serving as a higher education administrator with familiar colleagues, I had a sense that I was missing something important. All these identities influenced the choices I made in selecting sources, analyzing them, and interpreting their meaning. As I moved through the stages of this research design, I kept these influences in mind, acknowledging they are part of the "researcher as instrument" notion of interpretivism (Schwartz-Shea & Yanow, 2012), but I also worked to keep them in check to ensure the reader can make decisions about the content, knowing that neutrality was also important to me.

Chapter Summary

This chapter described the methodology for a qualitative research study designed to examine how policy actors use public policy processes to influence accreditation reform. Qualitative studies are unique from quantitative studies not in just their difference in data, but also in that which the researcher searches. Stake (1995) defined the difference in searching, "quantitative researchers have pressed for explanation and control; qualitative researchers have pressed for understanding the complex interrelationships among all that exists" (p. 37). Additionally, the methods of qualitative research often lend themselves to adjustments in process, new learning, and revised analysis strategies (Yin, 2009).

CHAPTER IV

DATA ANALYSIS AND RESULTS

This chapter presents a discussion of the data analysis and findings for this case study. I organized the chapter based on the two research questions. For research question 1 and its associated hypotheses, I discuss results and data analysis associated with the *prioritization* of accreditation reform as a public policy issue. Case study subunits, the PROSPER Act and the Aim Higher Act, provided context for the examination of how policy actors use narrative for this purpose. The *scope of conflict* strategy from the NPF theory and the associated examination of winners and losers frame the discussion. Research question 2 addresses the *formation* of policy. To address this question and its hypotheses, I discuss the results on the use of characters in policy narratives along with the NPF *angel/devil shift* strategies—how opponents use narrative to position themselves as heroes or vilify their adversaries. Throughout the chapter, I provide charts and tables to illustrate the results of my data analysis along with narrative samples to provide context for this qualitative study.

Data for this study came from 172 documents, produced between January 2017 and December 2018, that referenced accreditation or quality assurance. I selected these documents based on the inclusion criteria identified in Chapter 3. I used NVivo software to examine the narrative data. This qualitative analysis tool provides researchers with the ability to classify each document using a series of attributes along with traditional coding abilities. I classified documents in NVivo using three attributes: stance, source, and

timeline. For stance, I selected from status quo, pro-reform, or balanced. For source, I

selected from government, intermediary public policy organization (IPPO), or media.

Lastly, for timeline, I labeled each narrative with the publication month and year. I then

went through each document and coded for the NPF themes of benefits/costs, characters,

and the identification of a winner or loser. For the final step, I coded for the case study

subunits: PROSPER Act and Aim Higher Act. With all documents classified and coded, I

used the query functions within NVivo to aggregate and disaggregate data, run

comparisons, and examine the narratives associated with each of the themes. This chapter

provides additional detail on the results of these queries.

Before examining the data for each research question, I first categorized each of

the 172 documents based on the stance attribute. If narratives focused on reforming

accreditation, emphasizing the need for change, I classified them as pro-reform. If

narratives provided information on the strengths of existing accreditation practices or

provided narrative on the negative aspects of change, I classified them as status quo.

Because the topic of accreditation reform is contentious, I was able to easily identify a

distinct stance. If a narrative included both perspectives, I classified it as balanced. Once

I classified the documents with these identifiers, I sorted them into balanced, pro-reform

or status quo coalitions. Table 6 includes the composition of the two coalitions: pro-

reform and status quo, and those sources with balanced reporting. With the documents

aligned by coalition as identified in Table 6, I then examined the NPF coding results to

confirm the hypotheses for each of the two research questions.

Table 6

Advocacy Coalition Composition

	Status Quo Coalition	Pro-Reform Coalition	Balanced Reporting
Government Sources: (n=33)	None	House Committee on Education and Labor Health Education Labor and Pension Committee U.S. Department of Education (n=33)	None
IPPO Sources: (n=72)	Regional Accrediting Agencies American Association of Community Colleges American Association of State Colleges and Universities Association of American Universities American Council on Education Association of Public and Land-Grant Universities Council on Higher Education Accreditation National Association of Independent Colleges and Universities (n=35)	Lumina Foundation American Enterprise Institute Brookings Institute Center for American Progress New America The Heritage Foundation Urban Institute Association of American Colleges and Universities (n=37)	None
Media Sources: (n=67)	*New York Times* *PBS News* (n=4)	*Inside Higher Ed* *The Hill* (n=32)	*The Chronicle of Higher Education* *Politico* *Wall Street Journal* *Washington Post* (n=31)

Research Question 1: Influencing Policy Prioritization

Research question 1 asked: *How do policy actors use narrative strategies to promote accreditation reform as a priority issue?* The two hypotheses associated with this question are:

H1   Policy actors will use *issue expansion* as a narrative strategy to promote accreditation reform as a priority issue. Groups will emphasize costs and diminish the opposing groups' benefits.

H2   Policy actors will use *issue containment* as a narrative strategy to minimize accreditation reform as an issue. Groups will emphasize benefits and diminish costs in an effort to maintain the status quo.

Overview

NPF, the public policy theory framing this study's research questions, suggests issue coalitions will use the strategy of scope of conflict to promote their respective agendas (McBeth, Jones, & Shanahan, 2014). Because maintaining the status quo is more stable than reform movements, NPF scholars have identified coalitions focused on the status quo as "winning" coalitions. Conversely, NPF scholars identify coalitions advocating for issue reform as "losing" coalitions. As suggested by the two hypotheses, pro-reform (losing) coalition policy actors emphasize issue expansion by diffusing costs and concentrating benefits. Winning coalitions, or status quo policy actors, will use elements of the scope of conflict strategy to contain the issue through diffusion of benefits and the concentration of costs. Several studies have examined how coalitions have used scope of conflict to expand or contain policy issues (McBeth et al., 2007; McBeth et al., 2010; Shanahan et al., 2013). For example, the case study from Shanahan et al. (2013), that examined the narrative associated with the Cape Wind's proposal to install wind turbines off Nantucket, found results consistent with NPF theory. These researchers identified a difference in how the two competing coalitions used NPF scope

of conflict strategies. Similar to my study, the researchers evaluated hypotheses associated with issue expansion and issue containment.

To find support for these two hypotheses related to question 1 of this study, I analyzed the NPF codes for scope of conflict. I coded all documents using the following standardized NPF codes: many gain, few gain, many pay, few pay. I used the code "many gain" anytime the narrative referenced a large number of individuals or institutions that would benefit from the change or from maintaining the status quo. Similarly, I used the code "many pay" any time the narrative referenced a large number of individuals who would pay a high cost, often times referencing actual financial costs. If the narrative mentioned only a few individuals or institutions, I coded these documents with either "few pay" or "few gain." In addition to these codes, I coded each document for any reference to an identified winner, an identified loser, both, or neither. Finally, I counted the number of documents associated with each coalition.

Strategies Used by
Competing Coalitions

To analyze whether or not coalitions incorporate scope of conflict differently, NPF theory calls for researchers to identify the narrative elements coalitions use in their efforts to expand the issue or contain it. As a reminder, NPF scholars identify two narrative approaches that influence scope of conflict: 1) mention of winners and losers, and 2) description of benefits and costs. To conduct this examination, I queried the number of documents that included the associated codes. Table 7 provides the results of the NPF scope of conflict coding outcomes for the pro-reform and status quo coalitions. The number of documents and the percentages are included.

Table 7

Strategies Used by Status Quo and Pro-Reform Coalitions

Strategy	Status Quo (Winning Coalition) % (n = 39)		Pro-Reform (Losing Coalition) % (n = 102)	
Identification of Winners	35.9	(14)	41.2	(42)
Identification of Losers	51.3	(20)	52.9	(54)
Distribution of Benefits	33.3	(13)	2.9	(3)
	(diffused/many gain)		(concentrated/few gain)	
Distribution of Costs	5.1	(2)	64.7	(66)
	(concentrated/few pay)		(diffused/many pay)	

Table 7 illustrates the difference and similarities between to the two coalitions and how each of them incorporated the components of the scope of conflict strategy. If the results supported hypothesis 1, a higher percentage of documents from pro-reform sources would emphasize costs (many pay), would more frequently identify a loser, and would minimize benefits (few gain). If results supported hypothesis 2, documents from status quo sources would emphasize benefits (many gain), would more frequently identify a winner, and would minimize costs (few pay). Additionally, the total number of documents produced by each coalition within the period of the study provided additional insight into the research question. The pro-reform coalition should produce more documents in order to expand the issue, and the status quo coalition should produce fewer documents in order to contain the issue.

Identification of winners and losers. To confirm hypotheses 1 and 2, I expected the status quo coalition to identify more winners as a strategy to convince policymakers that the current accreditation policies are working. I expected the pro-reform coalition to identify more losers in order to demonstrate the need for change. In relationship to the

identification of winners and losers, an initial review of Table 7 suggests mixed support

for the two hypotheses. In examining the identification of a winner, only 14 (35.9%) of

the 39 documents produced by the status quo coalition identified a specific winner;

whereas, 42 (41.2%) of the 102 documents produced by the pro-reform coalition

identified a winner. In summary, the pro-reform coalition was actually more likely than

the status-quo coalition to identify a winner within their narratives.

This finding was inconsistent with NPF theory, but was explainable. It was

possible that the pro-reform coalition included both winners and losers in greater

numbers to emphasize (and expand) the importance of the issue. For example,

Representative Virginia Foxx, author of the PROSPER Act, who typically focused on

losers, also shared examples of winners. In her 2018 CHEA conference presentation, she

referenced how students would win with accreditation reform, "innovative approaches

like competency-based curricula and online learning. These and other creative solutions

can help students earn relevant degrees. They can help them graduate with less debt"

(Foxx, 2017, 7:44). Similarly, the status-quo coalition included references to both losers

and winners, but at a slightly lower rate. Based on NPF theory, I expected status quo, or

winning coalitions, to primarily mention winners. By highlighting winners, the winning

coalition preserves a positive (no need to change) policy image (Gupta et al., 2014).

However, in this study I also found the winning coalition made multiple references to

losers. AASCU president, in referencing the release of the PROSPER Act, stated it will

"disrupt access, discourage public service and teaching, and undermine educational

quality" (Howard, 2017, para. 2). Interestingly, these results are consistent with the

findings from a study by Gupta et al. (2014) on the siting of a nuclear power plant in

India. The data from the Gupta et al. study also suggested both coalitions used similar approaches, indicating these results signified an opportunity to modify the NPF theory.

Further analysis of the data included the identification of the winners and losers within the narratives. The results showed policy actors from both coalitions identified students as winners more than any other option. Examples from the pro-reform coalition included the following quotes: "We can improve the accreditation system, ensuring a balance between flexibility for institutions and accountability for students and taxpayers" (House Committee on Education and Labor [HCEL], 2017, para. 13); and "students and taxpayers have much to gain from accreditation reforms" (Hall & Reim, 2017, p. 1). These quotes emphasized how students would come out as winners if policymakers reformed accreditation. An example of narrative identifying students as winners from the status quo coalition is: "accreditation continues to play its critical role in helping the public and students identify and invest in quality institutions" (Ransom, Knepler, & Zapata-Gietl, 2018, p. 20). This quote indicated that students are winners under the current accreditation policy. In addition to students, the status quo referenced institutions as winners, "I have seen [accreditors] bring impressive insight into helping the institution thrive – in the application of its processes" (Winn, 2018, para. 13). These examples are representative of phrases that were coded as winners and illustrate how students and institutions are identified frequently as winners. Winner is one of the NPF codes used to evaluate the implementation of the scope of conflict narrative strategy.

The identification of a loser, however, was a strategy used even more often than the identification of a winner. A higher percentage of documents from both coalitions (51.3% for status quo and 52.9% for pro-reform) identified a loser. Most often, the losers

were either students or taxpayers. Policy actors from pro-reform documents made statements such as: "opportunities for postsecondary success are unequally shared, and that means millions of Americans cannot fully contribute to the nation's well-being or reach their own goals" (Lumina Foundation, 2017, p. 3). The IPPO, American Enterprise Institute, in a publication on accountability, included the following quote in its narrative in reference to accreditors, "notwithstanding the efforts of these regulatory bodies and the increasing degree of oversight of institutions, the results for students are worse than ever" (James, 2017, para. 5). The media included examples as well. *Inside Higher Ed* quoted Antoinette Flores from the Center for American Progress, "The sheer number of rules targeted would effectively gut the few protections for students left" (Kreighbaum, 2018, para. 17). An article in *The Hill* describes the current higher education system as "a system that has made the pursuit and completion of higher education extremely difficult, of not unachievable, for far too many students" (Bearse, 2018, para. 3). These examples illustrated how policy actors describe losers in their policy narratives. Additionally, these results are consistent in demonstrating how the language associated with the "loser's tale" is typically more divisive and is structured to mobilize change through emotionally charged rhetoric (Shanahan et al., 2011; Stone, 2012).

The status quo coalition referenced losers 51.3% of the time, almost equal to the pro-reform group. These narratives were primarily present in the admonishment of the PROSPER Act, legislation designed to reform accreditation. These status quo advocates made statements that included: "the proposed legislation represents a step backwards on access and quality because it eliminates important student benefits and undermines accountability. Students and the nation need more of both" (AASCU, 2017, para. 2).

Narrative from the *New York Times* stated, "Committee Democrats called the bill a 'war on students'" (Green, 2017, para. 16). Finally, a statement from a leading trade association included, "the PROSPER Act would be an alarming setback for students and taxpayers making both more vulnerable to unscrupulous actors and terrible outcomes that can wreak havoc on lives" (Association of Public and Land-Grant Universities [APLU], 2018, p. 5). Similar to the pro-reform coalition, the status quo narrative used emotionally charged words such as "undermines," "war," and "unscrupulous" to trigger an emotional response in the reader to garner support of their status quo position.

My findings suggest the use of winners and losers does not vary by coalition. Both coalitions used the identification of winners and losers consistently and at similar levels. The coalitions identified a loser slightly more often, approximately 10 to 15 percentage points more, compared to the identification of a winner. Because the identification of a loser can be more influential, evidence suggests the release of accreditation reform legislation put the status quo coalition into a defensive (losing) position, motivating them to incorporate "loser" strategies. The identification of a winner and/or loser within narratives is one of two narrative tools used to expand or contain the scope of conflict. The next section looks at the distribution of benefits and costs, a second tool used to evaluate the scope of conflict narrative strategy.

Distribution of benefits and costs. Another attribute researchers use to identify the NPF scope of conflict strategy is the distribution of benefits and costs. As a reminder, coalitions focused on reforming policy issues will stress the diffusion of costs, emphasizing that not reforming would have associated high costs for many. Coalitions set on maintaining the status quo will emphasize the diffusion of benefits, inferring that

maintaining the current policy is associated with ongoing benefits for many. Table 7 provides mixed support for this hypothesis. The data indicated the pro-reform coalition used the diffusion of costs, consistent with the NPF theory linked to "losing" coalitions. Conversely, the diffusion of benefits that should be associated with the status quo coalition is not as evident. Narratives from the status quo used the diffusion of benefits (many gain) in only one third of their documents.

To explore this discrepancy in more depth, I calculated the number of documents within the status quo coalition that included a reference to the legislation (PROSPER Act and Aim Higher Act) and those that did not. I found that almost half of the narratives analyzed included a mention of the accreditation reform legislation. I also found the documents that addressed the legislation used a different approach than those that did not. This duality in approach indicated the status quo coalition was working toward two goals, 1) maintain the status quo, and 2) mitigate the impending change associated with the proposed legislation. The results suggested the status quo used the strategy of diffusion of costs to support their arguments *against* an issue (similar to the role of a losing coalition). Stated in another way, the policy actors working to maintain the status quo shifted their strategy once accreditation reform legislation was released. Rather than maintaining narrative approaches that focused on benefits, they shifted to narratives that resembled the approaches more commonly used by those seeking change and focused on the high costs associated with accreditation reform legislation. Table 8 illustrates a summary of the results when I excluded documents that mention the legislation (either the PROSPER Act or Aim Higher Act). This disaggregation provided an opportunity to explore the distribution of benefits and costs in more detail.

Table 8

Strategies Used in Status Quo Narratives with No Reference to Legislation

Strategy	Winning Coalition (Status Quo) Narratives with no legislation	
	%	(n = 23)
Distribution of Benefits	43.5	(10)
	(diffused/many gain)	
Distribution of Costs	9.0	(2)
	(concentrated/few pay)	

As anticipated, Table 8 indicates the percentage of narratives that align with the NPF hypothesis increased. The number of narratives that identified diffused benefits increased from 33.3% to 43.5% and the number of narratives that include concentrated costs increased from 5.1% to 9.0%, bringing the new total to 52.5%. When status quo (winning) narratives addressed the importance of maintaining current accreditation policies, they frequently included a reference to the diffusion of benefits (many gain). For example, in Legon's (2017) opinion piece written for CHEA, he stated, "accreditation is the pillar of self-regulation of our colleges and universities…critically important to the millions of students seeking access to higher education" (Legon, 2017, p. 1). Alternatively, when the status quo coalition shifted to rallying against specific legislation, authors reduced the use of the diffusion of benefits strategy; replacing it with a greater emphasis on the diffusion of costs (many pay). An example from a status quo narrative that referenced the PROSPER Act states, "this bill would make higher education more expensive for millions of students and families" (Mitchell, 2017, p. 1). This coalition's strategy shifted when the release of legislation put them into a defensive or losing position, resulting in a shift of their narratives to a focus on the diffusion of costs.

By closely examining the data, this study demonstrated two outcomes related to the diffusion of costs and benefits. First, without disaggregating, the data suggested the status quo coalition shifted strategies from diffusing benefits to diffusing costs, indicating the second hypothesis was not supported. However, a second outcome revealed support for the NPF hypotheses when the data were disaggregated based on the exclusion of the post-legislation documents. As a reminder, NPF theory states the distribution of benefits and costs by opposing coalitions will be different. The status quo, or winning coalition, will focus on benefits while the pro-reform, or losing coalition, will focus on costs. Based on the disaggregated data in Table 8, the first hypothesis was fully supported and the second hypothesis had mixed support.

Similar to the evaluation of losers and winners, coalitions frequently identified students and taxpayers in their narratives associated with benefits and costs. In a statement on the importance of maintaining the current accreditation system, AASCU, President Mildred García (2018) shares, "AASCU institutions are delivering America's promise to millions of students" (para. 3). This statement represents a focus on how "many benefit" from maintaining the status quo. Conversely, the pro-reform policy actors focused on how a large number of students or taxpayers would experience high costs. Ben Miller, associated with the Center for American Progress, testified before the House Committee on Education and Labor. In his conclusion, he stated,

> Taxpayers, meanwhile, invest over $120 billion a year for educational options beyond high schools. The sums of money involved demand that we have a strong quality assurance system that ensures funds go to high-quality educations… accreditors have either stood by or acted with molasses-like speed while taxpayer investments and student dreams got wasted (Miller, 2017a, 42:37).

Miller's quote demonstrates how policy actors bring attention to large costs. This example and the others referenced previously included the phrases "over a $120 billion,"

"promise to millions of students," and "more expensive to millions of families."
Narrators used language emphasizing high costs to influence readers to support change,
in this case, accreditation reform.

I found that opposing coalitions in my study emphasized associated costs and
benefits in a manner that aligned with NPF theory. Pro-reform coalition results are better
aligned than the status quo. Status quo results showed alignment when I reviewed
narratives discussing the strengths of accreditation. When status quo narratives discussed
pending legislation, however, the description of costs and benefits began to align more
with that of a "losing" coalition. These results indicate instability or variability in the
strategies used by policy actors and the confusion that can exist in the identification of a
coalition as being in the winning or losing position.

Summary of strategies. I have explored research question 1, "*How do policy
actors use narrative strategies to promote accreditation reform as a priority issue*"
through an NPF lens that evaluates scope of conflict. The study results demonstrated
mixed alignment with the scholarly work associated with the theory. The pro-reform
coalition, in particular, followed the expected NPF patterns and used the identification of
losers along with a diffusion of costs to expand the scope of the issue of accreditation
reform. Alternatively, the status quo coalition demonstrated that it had not consistently
used the NPF scope of conflict strategies as expected. Although some evidence suggests
that the status quo coalition used strategies to contain the scope of the issue, they also
used some of the strategies associated with the pro-reform (losing) coalition. In addition
to scope of conflict strategies, I explored the quantity of narratives produced by each

coalition and the dates on which the policy actors produced the narratives. The next section describes these findings.

Rate of Narrative Production

In addition to analyzing the strategies used by the coalitions to contain or expand the issue of accreditation reform, I reviewed the rate of narrative production based on coalition. I queried the number of documents based on the month and year of publication and then disaggregated them by source (government, IPPO, or media) and stance (status quo or pro-reform). Figure 2 illustrates the rate of narrative publication based on milestones within the timeframe of the study, January 2017 through December 2018. This date range represents the 115th U.S. Congress. During this two-year period, policymakers introduced two major bills related to the reauthorization of the HEA that included accreditation reform measures. The first piece of legislation was the PROSPER Act, introduced by House Republicans on December 12, 2017, and the second bill introduced was the Aim Higher Act, introduced by House Democrats on July 26, 2018.

The pro-reform coalition trend line in Figure 2 indicates this coalition produced the highest number of documents on a consistent basis. Rates increased slightly during the pre-PROSPER period compared to the timeframe associated with the introduction of the legislation (from 3.7/month to 7/month). The rate then remained high and dipped only slightly as the legislative session closed. Based on NPF theory, I expected this trend as the pro-reform coalition worked to expand the issue to ensure Congress prioritized accreditation reform since one effective approach to getting the word out, or expanding the issue, is through sheer volume.
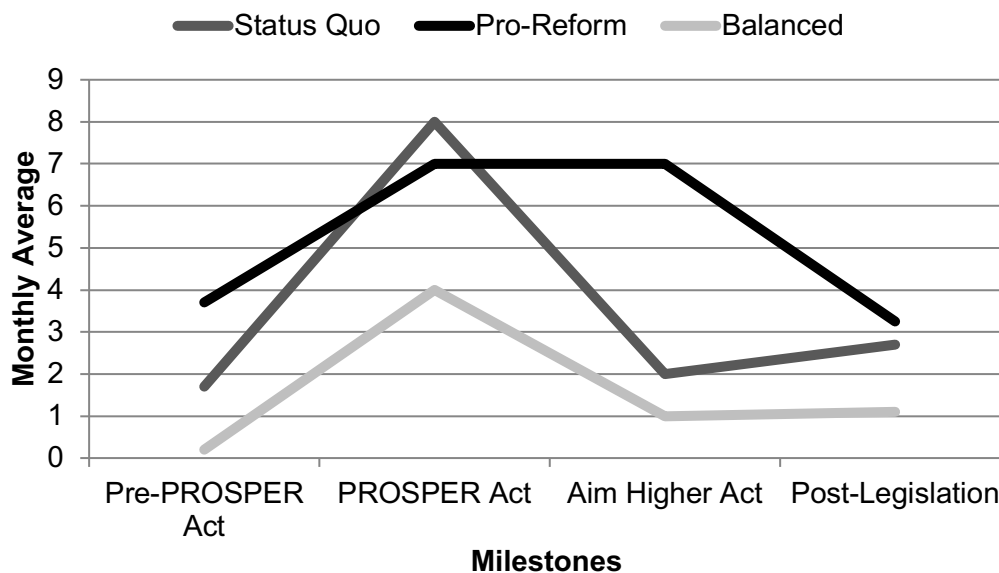
Figure 4. Average number of documents produced monthly, classified by coalition. Data entered at key milestones from January 2017 through December 2018.

Alternatively, Figure 4 shows that the status quo coalition had a relatively low narrative production average per month, and it only spiked in response to the PROSPER Act. Again, I expected this trend based on the NPF prediction that status quo coalitions attempt to contain an issue. Finally, the trend line in Figure 4 for balanced narrative production runs similar to the status quo, just at a lower level. These sources were not motivated, like the pro-reform coalition sources, to expand the issue.

I conducted an additional analysis to evaluate how narrative contributed to the prioritization of accreditation reform as a policy issue. I reviewed a report that identified the date of publication cross-walked by source type (government, IPPO, or media). Figure 3 illustrates the results of this analysis. The College Transparency Act, a lesser-known piece of legislation, was also included because it clarified the increased number of publications around its introduction.
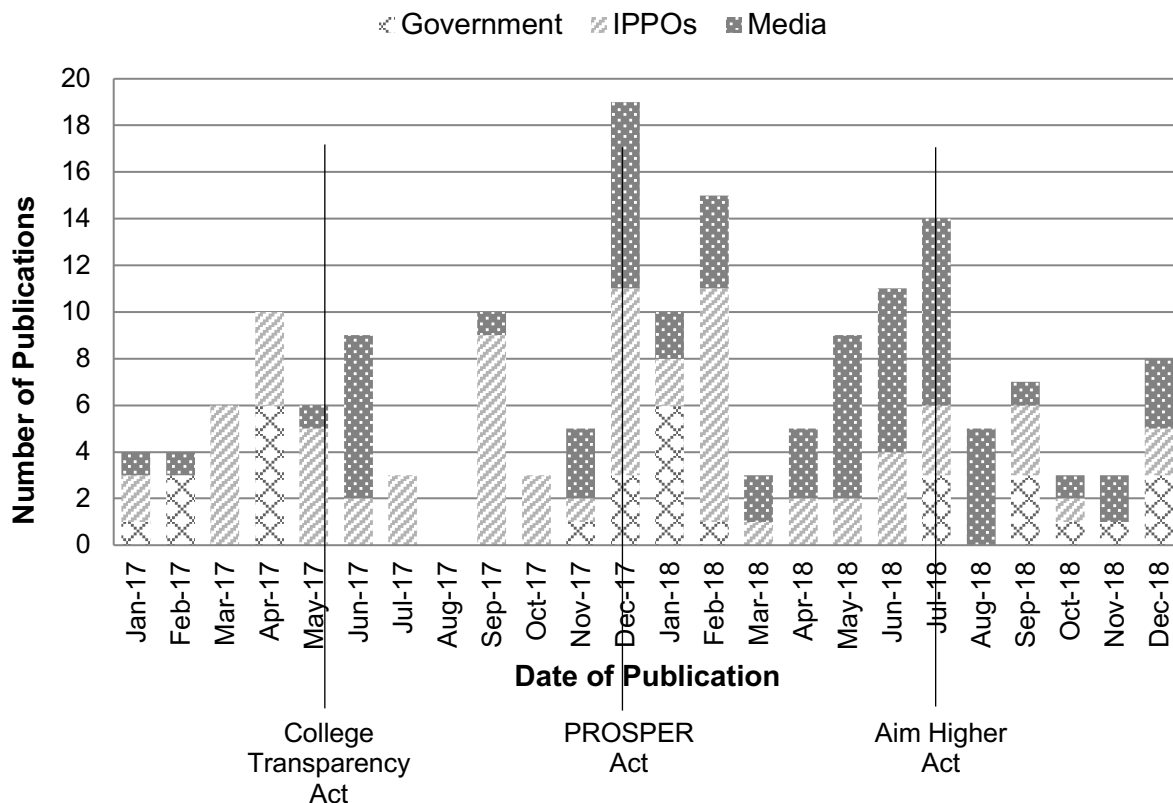
Figure 5. Number of documents published each month January 2017 through December 2018 based on source type. Dates of significant legislation identified for reference.

The information provided in Figure 5 illustrates three trends. First, the number and timing of narrative documents produced by media sources appears to be reactive. The graph shows a surge right after the College Transparency Act was introduced, then again when the PROSPER Act was introduced. Finally, when Democrats were discussing their counter bill, and subsequently released the final version of the Aim Higher Act, media sources were active once again. Alternatively, Figure 5 shows the documents produced by IPPO sources were high just before and right up to the introduction of the legislation, suggesting they were laying the groundwork for accreditation reform. Not surprisingly, since policy actors associated with the government typically *react* to the narrative

produced by IPPOs, government sources produced narratives clumped right around the introduction of legislation to support their actions.

Accreditation Reform Prioritized

In answering research question 1, *How do policy actors use narrative strategies to promote accreditation reform as a priority issue* the findings from the study support the NPF hypotheses that losing coalitions, or those groups who are advocating for change and reform, will expand the scope of the issue through emphasizing costs and identifying losers. The pro-reform coalition from this study demonstrated a more frequent mention of losers, more frequent mention of higher costs, and produced significantly more documents. Additionally, the pro-reform sources included emotionally charged language in their narratives to motivate change. The study findings were not as conclusive regarding the actions associated with the status quo coalition. NPF theory suggests these sources should have produced narratives that focused more on winners and should have emphasized benefits. Although policy actors associated with the status quo coalition did publish a significant number of narratives with these characteristics, they also had a high number of narratives that focused on losers and higher costs. This discrepancy may have been due to the defensive position the status quo coalition experienced as Congress introduced legislation with significant reforms. From this defensive position, the status quo coalition reacted similar to a "losing" coalition. Additionally, the status quo coalition produced fewer documents as compared to the pro-reform coalition. These findings suggest support the first hypothesis associated with research question 1, and illustrate mixed support for the second hypothesis. These results suggest the policy actors in this study used narrative to prioritize accreditation reform as a significant policy issue.

Research Question 2: Policy Formation

The second research question of this study asks: *How do policy actors use narrative archetypes to influence the formation of accreditation policy?* The two hypotheses associated with this question are:

> H3   Accreditation reformers will use the devil shift strategy and will include a high ratio of villains to heroes. Policy narratives will seek to vilify their opponents.

> H4   Policy actors supporting the accreditation status quo will use the angel shift strategy; narrative from supporters will have a high ratio of heroes to villains. These narratives will seek to identify heroes and allies.

Overview

Research question 1 asked about the influence of policy actors in the *prioritization* of a policy issue. Question 2 addresses the *formation* of policy. I framed the hypotheses of this question using the NPF narrative strategy referred to as the devil/angel shift strategy. NPF theory suggests that winners, or status quo coalitions, incorporate an angel shift strategy that focuses on heroes and allies in order to influence policymakers. Alternatively, losers, or pro-reform coalitions, will focus on a devil shift that includes references to victims and villains. I examined the policy stories of these two coalitions to evaluate their use of these archetypical characters. Table 9 provides definitions and examples of the NPF elements used to examine this research question and the associated hypotheses.

Table 9

Narrative Policy Framework Character and Devil/Angel Shift Definitions

Element	Definition*	Accreditation Reform Example
Characters	Participants in a policy narrative	
Hero	The entity designated as making the situation right or fixing the problem.	The USDE, an entity that is resolute on de-regulating higher education in order to increase innovation. (Pro-Reform)
Victim	The entity harmed by a specific condition or situation.	College students who are at risk or harmed because accreditation reform could strip them of protections from predatory institutions. (Status Quo)
Villain	The entity responsible for the damage done the victim or the entity responsible for the problem.	For-profit institutions that have historically abused federal financial aid, bringing harm to students and taxpayers. (Status Quo)
Devil shift	A policy story exaggerating the power of an opponent and seeks to blame and vilify.	The Obama administration and its regulations related to accreditation have driven up costs, restricted access to higher education and cost taxpayers billions of dollars. (Pro-Reform)
Angel shift	A policy story that emphasizes a coalition's ability and/or commitment to solving a problem, while de-emphasizing the villain.	Regional accreditation is the gold standard, has the ability to keep costs low, and has the potential to improve accountability and enhance innovation. (Status Quo)

*Definitions from Shanahan et al., 2013, p. 459.

For this research question, I coded the study documents with NPF themes based on character type as well as the entity of the named character. For example, a common victim within the narrative was the student. I therefore labeled all references to student

victims as *victim-student*. A common villain within the pro-reform narratives was the accrediting agencies, so I coded each villain reference associated with an accreditor as *villain-accreditor*. To analyze the policy stories that focused on a devil shift or angel shift, I also captured the frequency of character use.

Character Types

The use of character archetypes is central to NPF theory (Crow & Berggren, 2014). In analyzing the use of characters, I identified 43 different entities as a hero, a victim, or a villain. Many entities emerged under more than one category. For example, authors identified accrediting agencies as heroes within status quo narratives, and pro-reform authors coined these same entities as villains. To illustrate, in testimony associated with accreditation reform, McComis (2017) stated, "Accreditation as an education quality assessment mechanism has been the hallmark of educational success in this country for over a century" (47:46). This narrative presents accreditors as heroes, and suggests they are the solution to the policy problem. Alternatively, in a report produced by the IPPO American Enterprise Institute, the author stated, "the current accreditation mechanism, which allows institutions access to Title IV dollars, imposes high compliance costs but provides little meaningful accountability" (Turner, 2018, p. 10). Here, accreditors were positioned as villains, blamed for the problem and illustrated the need for accreditation reform. Other examples of entities coded as hero and villain included Congress, Democrats, the PROSPER Act, and the Trump Administration.

To address question 2 hypotheses, I analyzed the use of specific entities and their character identification by status quo and pro-reform coalitions. This analysis included the identification of the entity as well as the frequency of use to determine if the two

coalitions were more or less likely to use certain character types (heroes, victims, and villains). I also calculated a percentage to compare the rate of use. Table 10 depicts the results of the analysis and is inclusive of entities that authors referenced in a minimum of seven documents across both coalitions. I selected this value because there was clear line of demarcation in the results. I identified additional entities, but did not include them because authors only referenced them once or twice.

The findings in Table 10 show that pro-reform narratives were more likely to identify villains and victims. For almost all entities, the pro-reform villain percentage was higher. For example, both coalitions identified accreditors as villains; however, accreditors were villains in only 10% of the status quo narratives, but represented villains in almost half of the pro-reform narratives. Conversely, entities identified as heroes experienced a higher rate of inclusion in status quo narratives as compared to pro-reform. To illustrate this difference, pro-reform narratives identified public/private institutions as heroes in less than 2% of their narratives. Alternatively, status quo narratives identified them in 17.9% of their narratives.

Table 10

*Characterization of Different Character Archetypes in Status Quo Documents (n=39) vs.
Pro-Reform Documents (n=102)*

Entity*	Hero		Victim		Villain	
	Status Quo % (n)	Pro-Reform % (n)	Status Quo % (n)	Pro-Reform % (n)	Status Quo % (n)	Pro-Reform % (n)
Accreditors	28.2 (11)	7.8 (8)	12.8 (5)	15.7 (16)	10.2 (4)	46.1 (47)
Students	0 (0)	0 (0)	48.7 (19)	54.9 (56)	0 (0)	0 (0)
USDE	0 (0)	6.9 (7)	0 (0)	0 (0)	30.8 (12)	44.1 (45)
Public/Private Institutions	17.9 (7)	1.96 (2)	20.5 (8)	9.8 (10)	5.1 (2)	22.5 (23)
Taxpayers	0 (0)	0 (0)	15.4 (6)	32.4 (33)	0 (0)	0 (0)
For-Profit Institutions	0 (0)	.98 (1)	5.1 (2)	2.9 (3)	17.9 (7)	20.6 (21)
Low-Income Students	0 (0)	0 (0)	10.3 (4)	19.6 (20)	0 (0)	0 (0)
PROSPER Act	0 (0)	6.9 (7)	0 (0)	0 (0)	20.5 (8)	7.8 (8)
Higher Education System	2.6 (1)	.98 (1)	2.6 (1)	4.9 (5)	2.6 (1)	7.8 (8)
Congress	0 (0)	.98 (1)	0 (0)	.98 (1)	10.3 (4)	6.9 (7)
Students of Color	0 (0)	0 (0)	7.7 (3)	12.7 (13)	0 (0)	0 (0)
DeVos	0 (0)	3.9 (4)	0 (0)	0 (0)	2.6 (1)	5.9 (6)
State Disinvestment	0 (0)	0 (0)	0 (0)	0 (0)	7.7 (3)	4.9 (5)
Obama Administration	0 (0)	0 (0)	0 (0)	0 (0)	5.1 (2)	4.9 (5)

*Entity included if present in seven or more documents.

In analyzing the use of a victim character, *student* was the most common entity identified by both coalitions. Table 10 reveals that the percentage of documents including students was similar: the status quo coalition included the student as victim in 47.5% of their narratives and the pro-reform coalition identified the victim-student in 55.4% of their narratives. Outside of students, the pro-reform coalition identified other victims almost twice as often as status quo narratives. For example, status quo narratives included taxpayers only 15.4% of the time, pro-reform 32.7%. Low-income students showed up as victims in 10.3% of the status quo narratives and 19.8% of the pro-reform narratives; and students of color were 7.5% and 12.9% respectively. Students and taxpayers are only represented as victims, never heroes or victims. To vilify one's opponent, identifying the victim of those villains reinforces the argument, and both coalitions used students with similar frequency. However, the pro-reform coalition more frequently incorporated vulnerable student populations: students of color and low-income students, in an effort to increase the emotional response associated with identifying a victim.

The identification of entities as heroes, victims, or villains is important to the evaluation of how coalitions implement the NPF angel/devil shift strategy to persuade readers. The frequency of use, the ratio of heroes to villains, and the identification of entities all contribute to the analysis. The following sections provide more detail on the results from this study that inform the examination of the angel/devil shift as a strategy used to influence the formation of public policy.

Angel/Devil Shift

The use of characters within narratives is an indicator of whether or not a coalition is implementing a devil or angel shift. Stone (2012) noted that in classical

stories, heroes solve problems, and villains instigate problems. NPF scholars have

consistently found that policy narratives using the devil shift as a strategy to mobilize

change will use villains more often than heroes. Conversely, policy narratives

incorporating an angel shift strategy will identify heroes more frequently (McBeth,

Lybecker, & Husmann, 2014). To evaluate the overall use of these archetypes, I coded

documents and counted them based on whether or not they identified each type of

character. Tables 11, 12, and 13 document the analysis of the use of heroes, victims, and

villains within this study.

Table 11

Character Use Percentages by Status Quo and Pro-Reform Coalitions

		Status Quo % (n)	Pro-Reform % (n)
Hero	Use	43.6% (17)	51.0% (52)
	No use	56.4% (22)	49.0% (50)
	Total	100% (39)	100% (102)
Victim	Use	76.9% (30)	77.4% (79)
	No use	23.1% (9)	22.5% (23)
	Total	100% (39)	100% (102)
Villain	Use	82.1% (32)	91.2% (93)
	No use	17.9% (7)	8.8% (9)
	Total	100% (39)	100% (102)

The use of heroes, victims, and villains is surprisingly consistent across the status

quo and pro-reform narratives. NPF theory suggests these numbers should be different in

an attempt to differentiate their narrative strategies. However, the data revealed both

status quo and pro-reform coalitions identified a victim in approximately 77% of their

narratives. The pro-reform narratives revealed a slightly higher use of villains (91.2%

compared to 82.1%) compared to status quo, but both included villains in a high percentage of their narratives (see Table 11).

In addition to identifying whether a character type was included in a document, I tracked the frequency within each document of the character types. I documented these results in Table 12. The status quo coalition incorporated an average of just over two villains in their narratives. Comparatively, the pro-reform coalition mentioned an average of almost three villains per narrative. Because a t-test can determine significance between population means, I conducted t-tests on the mean results of "character use" to determine if the values were significantly different. For heroes and victims, no significant difference resulted. However, for villains, the t-test results indicated a statistically significant difference (0.0012 $p < 0.05$), demonstrating the pro-reform coalition used significantly more villains compared to the status quo coalition. This difference contributes to the evidence of the implementation of the devil shift strategy.

Table 12

Character Use Means by Status Quo and Pro-Reform Coalitions

	Number of Characters per Document		
	Status Quo Mean (n)	Pro-Reform Mean (n)	t-statistic, p-value
Heroes	1.65 (17)	1.48 (52)	0.560, *ns*
Victims	2.94 (30)	2.30 (79)	0.091, *ns*
Villains	1.84 (32)	2.74 (93)	0.001, *sig*

Additionally, when I reviewed the ratio of heroes to villains, the data indicated the ratio of heroes to villains is different between the two coalitions. Per Table 13, the ratio of heroes to villains for the status quo coalition is 1:1.12. The pro-reform ratio is almost twice as high at 1:1.85. If a coalition is incorporating a devil shift, a coalition's narrative will have a high ratio of villains to heroes; if a coalition is incorporating an angel shift,

the converse is true (Gottlieb et al., 2018). These results support the premise that the pro-reform coalition is incorporating the devil shift narrative strategy.

Table 13

Ratio of Heroes to Villains

	Status Quo Heroes/Villains	Pro-Reform Heroes/Villains
Mean per Document	1.65/1.84	1.48/2.74
Ratio	1:1.12	1:1.85

To explore the use of villains in more depth, I wanted to explore the outlier documents—those documents that had more villains than average. Because standard deviation is a commonly accepted measure of variation, I calculated the standard deviation for the mean number of villains for status quo and pro-reform documents and then reviewed those narratives that had a number of villains above one standard deviation. I selected one standard deviation because the number of documents in this range provided a usable sample. Two standard deviations or higher represented document sets that were too small. Calculating one standard deviation above the mean resulted in reviewing status quo documents that identified four or more villains and pro-reform documents that had five or more villains. This examination resulted in 5 narratives from the status quo coalition and 11 narratives from the pro-reform coalition.

Of the 16 total documents, seven (43.8%) of them came from narratives produced by government sources such as testimony at governmental hearings, press releases, and reports written for government agencies, all of which fell within the pro-reform coalition. For IPPO and media sources, three outlier documents came from IPPO sources and six from media sources with representation from both coalitions. Figure 4 illustrates the difference in number of documents based on source.
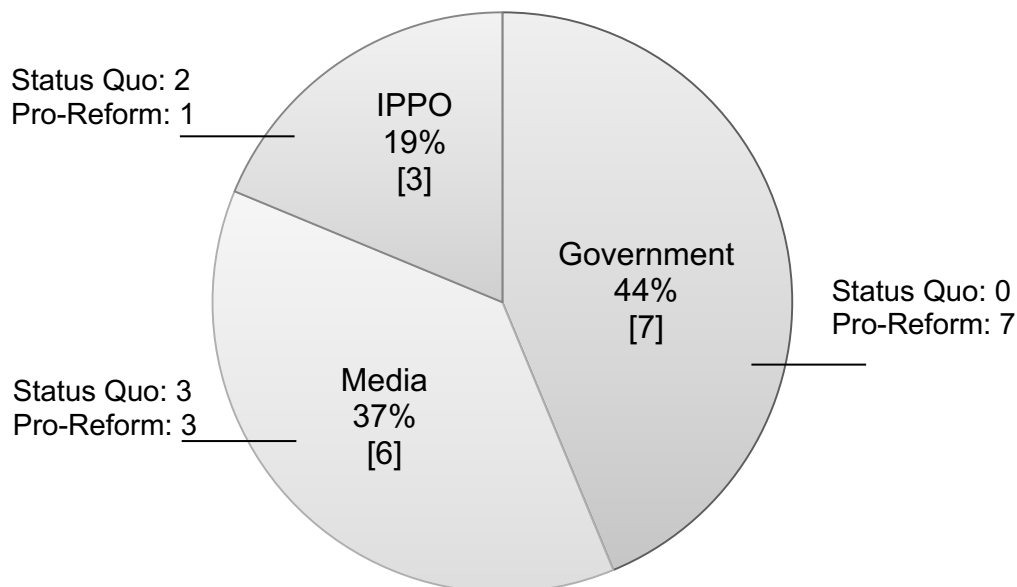
Figure 6. Narratives with a high number of villains (based on one standard deviation above the mean number of villains). Categorized by source with a breakout identifying number of documents by coalition.

The data illustrated in Figure 6 reveals two trends: 1) the pro-reform coalition was more likely to use a high number of villains in their narratives, and 2) government and media sources tended to use more villains relative to IPPO sources. Regarding the first trend, the inclusion of a higher number of villains within the pro-reform coalition narratives is consistent with their use of the devil shift strategy. The second trend is more challenging to interpret. Additional investigation into the use of characters by source was needed to determine if the difference noted in this study was a consistent trend. There appeared to be a more divisive tone in the government documents evidenced by the use of a high number of villains.

An outlier document from a government source that included reference to nine villains was a press release from the USDE reporting on a speech from Secretary of Education, Betsy DeVos (USDE, 2018a). Examples within the narrative included the

following quotes. DeVos (2018) identifies the Obama Administration as a villain, "under the guise of helping expand the Pell grant program and paying for ObamaCare, the previous administration federalized the student loan portfolio" (p. 5). In describing the USDE as a villain, she continues, "*Everything* has become more cumbersome and confusing for *everyone. The government [USDE] monopoly has proven costly to taxpayers and it hasn't been a panacea for students either*" [emphasis in original] (USDE, 2018a, p. 5). Finally, a third example illustrates how she vilifies colleges and universities, "when the federal government loans more taxpayer money, schools raise their rates" (p. 5). Additionally, DeVos identified herself as the hero in this document, stating, "As Secretary, I can move on a few, small tactical measures. And we are working daily to improve *every* part of FSA's [Federal Student Aid] operations and I'm committed to doing everything I can to solve this crisis" (p. 6). These quotes and more like them suggested a divisive culture within the federal government narratives as compared to other sources such as IPPOs and media.

To contrast this example, a document from the status quo coalition that emphasized heroes is an opinion piece by John Bassett, former university president, written for the Council for Higher Education Accreditation (CHEA). He referred to accreditors as heroes in several instances, including, "a great deal about accreditation goes well and is rarely controversial…second, the self-study process needed for accreditation is found to be valuable by most programs and colleges" (Bassett, 2017, p. 1–2). Bassett (2017) also identifies colleges and universities as heroes in this statement, "how many of these colleges are so bad that their communities would be better off if they had to close their doors? It is a sobering question since many colleges who

struggle the hardest still serve an important purpose to members of their communities" (p. 2). These two examples, one from the pro-reform coalition and one from the status quo coalition exemplify the different approaches frequently found in how winning and losing coalitions frame their narratives.

A final source of information I reviewed to examine the use of the angel/devil shift was the list of entities the narratives identified as heroes and villains. As a reminder, the NPF suggests that losing coalitions, represented by the pro-reform group in this case study, will vilify their opponent. In evaluating the characterization of entities displayed in Table 10, the most referenced villain by the pro-reform coalition is accreditation, with 46.1% of their narratives vilifying accrediting agencies. The second most likely villain is the USDE, identified as a villain in 44.1% of their documents. In order to convince policy actors change is needed, the pro-reform coalition policy actors used the devil shift strategy and painted an image of their *opponents* as being more powerful than they really are and more evil than they actually are—a common finding in NPF scholarship. For the status quo coalition, the angel shift strategy suggests they will identify *themselves* as the hero. Again, referencing Table 10, the heroes most often referenced by the status quo coalition were accreditors (27.5%), and colleges and universities (17.5%) indicating the NPF angel shift strategy was in play with the status quo coalition since these heroes are representative of the status quo policy actors.

The archetype of the villain (and the associated negative effect on the victim) is a powerful character and can be quite persuasive in mobilizing individuals to move toward change (Shanahan et al., 2011; Stone, 2012). In addressing the second research question to determine if policy actor narratives influenced the formation of policy, the introduction

of the PROSPER Act and the Aim Higher Act provided evidence of this influence. Specifically, the PROSPER Act, the first HEA reauthorization legislation introduced in the 115th Congress, included a call for significant accreditation reform, indicating the impact of pro-reform narrative on the formation of this public policy. As evidence of the reform included in the legislation, a narrative describing the PROSPER Act stated, "it would change everything from the way families finance education to the way colleges are held accountable for their performance" (Douglas-Gabriel, 2017, para. 3). The proposed legislation included significant changes for these agencies, suggesting pro-reform ideals influenced policy actors and were included in the formation of the policy.

The data analysis and results from this study indicated support for the hypotheses associated with research question 2. Hypothesis 3 stated accreditation reformers would use the devil shift strategy, include a high ratio of villains to heroes, and vilify their opponents. My analysis of the 102 pro-reform coalition documents supports this hypothesis. Hypothesis 4 included the necessary components that indicate evidence of the status quo coalition's alignment with NPF theory. My analysis of the 39 status quo documents indicated a degree of alignment, although not as conclusive as hypothesis 3. Although the status quo coalition's shift from maintaining the status quo to opposing the introduced legislation resulted in muddied outcomes, the data suggested areas of alignment with NPF. The status quo coalition used the angel shift strategy, demonstrated by the identification with more heroes and allies and a lower ratio of villains to heroes as compared to the pro-reform coalition. The muddied outcomes included the implementation of more "loser" strategies than would be expected.

Chapter Summary

This study sought to answer two key questions: 1) *How do policy actors use narrative strategies to promote accreditation reform as a priority issue,* and 2) *How do policy actors use narrative archetypes to influence the formation of accreditation policy?* The data from my content analysis of 172 policy narratives involved in shaping the national policy conversations on accreditation reform suggested these opposing groups incorporated strategies in alignment with the NPF theory (McBeth, Jones, & Shanahan, 2014). The status quo coalition, when compared to the pro-reform coalition, incorporated strategies typical of winning groups. The narratives associated with the status quo were more likely to identify a winner, incorporate a hero, and implement an angel shift strategy. In contrast, the pre-reform coalition consistently identified a loser, made mention of villains more frequently, and implemented the devil shift strategy in which they vilified their opponents. The exception to the NPF theory was the use of "losing" strategies by the status quo coalition. Although they were more likely to identify a winner as compared to the pro-reform group, they also incorporated the strategies normally used by the losing coalition. In this study, in addition to winning strategies, the status quo coalition also included the identification of a loser, included victims and villains in their narratives, and would sometimes implement the devil strategy—tactics typically associated with the losing or pro-reform coalition.

NPF scholars developed their public policy theory to better understand the action of governments. In response to question 1, the results were mixed. Table 7 illustrates the NPF data points used to indicate whether the coalition was constraining the issue or expanding the issue; these data showed little difference between the two coalitions. Both

the status quo and the pro-reform groups incorporated a winner about one third of the time and loser half of the time. Additionally, both groups indicated that many would gain (diffused benefits) about one third of the time and suggested many would pay (diffused costs) about two thirds of the time. The data points associated with the frequency and source of narratives does support how policy actors use narrative to prioritize a public policy issue. These indicators suggest IPPOs and government agencies in favor of reform flooded the field with narratives right before legislators introduced a piece of legislation, creating an environment ripe for reform legislation. These narratives served their purpose in elevating the policy issue of accreditation reform to a level of interest high enough to spur legislators into action. Additionally, media sources joined the fray once the legislation was introduced, creating a high point in the production of narratives from both pro-reform and status quo coalitions as they reacted to the legislation.

Question 2 addressed how narratives contribute to the formation of legislation. I found the results of the data associated with the question 2 hypotheses aligned more closely with NPF theory. The ultimate test of the angel/devil shift was found in the ratio of heroes to villains where the data suggested the pro-reform coalition was almost twice as likely to incorporate a villain as compared to the status quo—although both coalitions made use of the devil shift, the pro-reform coalition implemented it more frequently. The use of policy narrative contributed to the accreditation reform legislation introduced during the 115th Congress. Unfortunately, the divisiveness present in the House and Senate prevented the legislation from moving forward and becoming law.

CHAPTER V

DISCUSSION AND CONCLUSION

This final chapter opens with a summary of the study and its key findings. I follow this section with the study limitations. Implications of the findings for policymakers, higher education professionals, and the theoretical framework come next, along with further discussion on the topic. Finally, the chapter concludes with ideas for future research that can build on the findings from this dissertation, a reflection on the significance and contributions of the study, and a final chapter conclusion.

Summary of the Study

Before discussing the implications of the research findings, I have provided a summary of the study. The summary opens with a review of the study's purpose, a discussion on how the research questions framed the study, and how I incorporated the theoretical framework. I then end this section with a succinct summary of the key findings from Chapter 4.

Study Purpose

The study's purpose was to better understand how policy actors use public policy narrative strategies in their efforts to influence policy prioritization and then secure the resultant legislation necessary to move their agendas forward. Specifically, the study focused on the policy work related to accreditation reform and the stories policy actors tell to influence change in accreditation policy, or to maintain the status quo and reject reform. Accreditation policy significantly impacts the work of higher education

professionals. The direction of accreditation policy typically sways the direction of higher education. Reform impacts everything from how institutions are funded, to the amount of data that must be collected, to the definition of the credit hour. Supporters of the status quo are seeking stability; reformers are looking for innovation. I also wanted the study to provide insight into opposing coalitions and the differences in their narrative strategies. Finally, the study also shed light on how different policy actors, specifically government actors, IPPOs, and the media, use narrative in addressing public policy topics related to accreditation reform within the context of the reauthorization of the HEA.

I framed the study using Narrative Policy Framework (NPF) theory. Therefore, I also anticipated the study could provide insight into how well NPF theory aligned with this particular public policy issue. To date, researchers have primarily conducted NPF research on public policy related to highly contested environmental issues such as emissions, nuclear sites, fracking, and climate change (Gottlieb, Oehninger, & Arnold, 2018; Grubert & Algee-Hewitt, 2017; Gupta et al., 2014; Jones, 2014; Muto, 2017; Weible et al., 2016; Zanocco, Song, & Jones, 2018). The accreditation reform in higher education policy issue was a departure from the typical environmental issues NPF scholars usually explored. This study was an opportunity to determine if NPF could be predictive outside of this standard setting. In addition to addressing context, I anticipated the results of this study would also provide insight into whether or not the NPF hypotheses related to scope of conflict and the angel/devil shift strategies were supported.

Key Findings

I organized my findings in Chapter 4 around the two research questions. The first research question, *How do policy actors use narrative strategies to promote accreditation*

reform as a priority issue, emphasizes the prioritization of accreditation reform as a policy issue and how the NPF narrative strategy of scope of conflict provides evidence of this process. The second research question, *How do policy actors use narrative archetypes to influence the formation of accreditation policy,* explores how policy narrators use the NPF devil/angel shift strategy to influence change and mobilize policy actors.

      Prioritization of accreditation reform. In reviewing the results for research question 1, the narratives produced by the pro-reform coalition indicated a supported hypothesis related to scope of conflict. NPF theory outlines the necessary evidence for this conclusion through the strategies used within the narratives. For example, the identification of either a winner or a loser and the diffusion of costs and benefits are narrative strategies that affect whether a coalition is containing or expanding the issue (scope of conflict). I also noted narratives produced by the pro-reform coalition outnumbered those produced by the status-quo coalition by an almost three to one ratio. This finding suggested policy actors with a reform or change agenda are more likely to expand the scope of the issue through a higher production of documents and by their choice of narrative strategy. Additionally, the pro-reform coalition identified a loser within the narrative of these documents more frequently in an attempt to elevate the importance of their agenda through telling a loser's tale that seeks to destabilize the status quo and mobilize action. I also found the pro-reform coalition's narratives more frequently focused on the diffusion of costs—suggesting many people would pay a high price if current accreditation policies were allowed to continue and reform not implemented. The pro-reform coalition narratives focused on an HEA agenda that called

for significant changes and used a diffusion of costs as the reasoning. Carnevale's (2018) testimony before the Committee on Health, Education, Labor, and Pensions (HELP) recounted that the current regional accrediting model was designed to provide feedback to colleges and should be reformed to measure outcomes. Without this change, he suggested the "the system has led to egregious outcomes and a waste of public funds" (Carnevale, 2018, p. 8).

Data analyzed around the status quo coalition documents indicated the status quo coalition responded as expected. This coalition kept the number of documents to a significantly fewer number in an effort to minimize attention to the policy issue. However, the status quo did not respond as expected in the use of identifying winners and the diffusion of benefits. Although the status quo coalition used this strategy in approximately one third of their documents, they also relied on the incorporation of the loser's tale, especially after Congress introduced accreditation reform legislation. The introduction of the PROSPER Act, an HEA reauthorization bill, spurred significant responses from trade associations decrying the potentially high cost of this legislation. For example, the American Council on Education, representing 36 additional higher education trade associations, sent a letter to the authors of the bill stating the bill would increase the cost of higher education for millions of students (Mitchell, 2017).

Another key finding related to the prioritization of accreditation reform as a policy issue was that intermediary public policy organizations (IPPOs) were more active in expanding the scope of an issue, producing a higher rate of narrative documents compared to other sources right before congress introduced legislation. This outcome suggests IPPOs are instrumental to the prioritization of public policy issues. In the case of

accreditation reform, narratives produced by governmental agencies were strictly associated with a pro-reform stance and, like IPPOs, were more active before the introduction of legislation. Because legislation is typically introduced to change current policy, it is reasonable that governmental narrative would focus on reform. To move their agendas forward, these policy actors contributed significantly to the number of pro-reform coalition documents, although not quite as extensively as the IPPOs. Authors writing for the media, from both pro-reform and status quo coalitions, produced documents in response to the legislation (after the release rather than before) suggesting they contributed minimally to the prioritization of the policy issue.

Policy formation. In response to research question 2, I found policy actors regularly incorporated narrative archetypes to influence the formation of policy designed to reform accreditation practices. Findings indicated both status quo and pro-reform coalitions incorporated the archetypical characters of heroes, victims, and villains in almost all of their documents at varying levels. How authors use these characters, according to NPF theory, provides evidence of the angel/devil shift strategies. Coalitions use these strategies to persuade and move policy actors to action. In the case of accreditation reform, pro-reform actors motivated legislators to incorporate accreditation reform policy in the two HEA Reauthorization bills, the PROSPER Act and the Aim Higher Act, by incorporating more villains. DeVos (2018) villainized accrediting agencies in her remarks to ACE. She described the current model as costly and prohibitive to competition. Introducing a villain within narrative like this example provokes emotion and motivates actors to initiate change. The villain and the associated victim provide evidence of the needed change.

Both coalitions were consistent in their use of each type of character. Narrators for both coalitions mentioned heroes in approximately half of their documents, victims in three fourths of their documents, and villains even more frequently—in 82% of the documents for the status quo coalition and in 91% of the documents for the pro-reform coalition. Where I encountered a difference in the two coalitions was in the number of entities identified as each character. In my coding, I documented the number of unique heroes and villains in each narrative. NPF theory infers that a coalition is implementing the devil shift strategy if its narratives contain a higher ratio of villains to heroes. Therefore, I calculated the ratio of villains to heroes for both coalitions and found the pro-reform coalition had a higher ratio of villains compared to the status quo coalition. Because the pro-reform coalition narratives mentioned more villains in each document compared to heroes, I concluded the pro-reform coalition aligned with the NPF in their implementation of the devil shift strategy.

The pro-reform coalition also vilified accreditors and the USDE, entities representing the status quo, in two thirds of their documents. By vilifying the opponent, these narrators encouraged policymakers to act and address the "evil." Both HEA Reauthorization bills included significant reform to accreditation. The changes to accreditation policy that were within the PROSPER bill included a reduction of oversight of for-profit, potentially predatory, institutions; a higher level of accountability for minority-serving institutions; the move to accredit competency-based education (CBE) and apprenticeships; and the granting of Title IV federal funding for non-accredited organizations (Harris, 2017). The inclusion of these reform strategies in the bills

suggested the pro-reform coalition narrative incorporated the devil shift strategy to influence the formation of the legislation.

      Narrative Policy Framework alignment. Scholars use NPF public policy theory to frame the interpretation of policy actors' use of narrative. This study focused on two of the three NPF policy narrative strategies. The two strategies that served to answer the study's research questions were scope of conflict and angel/devil shift. After analyzing the results of the study, I noted two key findings related to the theoretical framework. First, the concept of winners and losers is more fluid than what the theory suggests. Coalitions may move between a position of strength and a position of defense. My results showed how the status quo began as a winning coalition, but the introduction of reform legislation eventually pushed them into a defensive position. From this position, they acted in their narratives more like an NPF losing group. Other NPF researchers uncovered a similar finding (Gottlieb et al., 2018). These scholars also found that the winning coalition used the devil shift, a result not anticipated by the NPF. Their review of the literature resulted in further questioning related to the connection between angel/devil shifts and the winning-losing concept (Gottlieb et al., 2018). The results from my study align with the Gottlieb et al. (2018) hypothesis. Because the results do not consistently align with winning and losing coalitions, this dissertation and the Gottleib et al. study suggest different factors may be involved in determining when a policy actor decides on when to use angel/devil shifts as a strategy.

      Second, throughout the coding process, it was clear that in addition to heroes, victims, and villains, the narratives frequently identified beneficiaries. Narrators included situations that described who would benefit and how, specifically naming entities such as

students and taxpayers. In Ubell's (2018) opinion piece on the strengths of current accreditation policy, the author identified students as the beneficiaries of the current accreditation system, stating "once a higher education institution is accredited, students can enroll with confidence, unafraid it will suddenly fold or be revealed as just another scam, a shabby diploma mill" (para. 4). Therefore, a key finding related to the NPF theory is the need to explore this fourth archetypical character and how it contributes to the angel/devil shift strategy.

Aside from these observations of opportunities for NPF scholars to address inconsistencies, the results of this research demonstrated alignment with NPF hypotheses, especially in relation to the pro-reform coalition. Additionally, this study provided evidence of the effectiveness of NPF theory, and the important role of narrative in public policy process, in a context outside of highly contested environmental issues. By demonstrating NPF's ability to be predictive in the public policy issue of higher education accreditation reform, this study opens the door for public policy scholars to use NPF in several contexts to advance public policy research.

Study Limitations

Some limitations to this research exist. When I analyzed the possible limitations of the study, I first addressed my professional affiliation with an institution of higher education. This insider perspective, also referred as an emic view, most likely influenced the study. I brought significant working knowledge about the field of higher education and the experience of institutions going through accreditation. Because of this experience, the topic also had meaning for me and kept me engaged throughout the research process. I made a conscious effort to be aware of my emic perspective, ensuring

a neutral position in reading narratives from status quo and pro-reform sources. If others from outside of higher education conducted the research, they might have taken a different approach or analyzed the results differently.

Although I made every effort to gather all documents produced during the study's timeframe, based on my rules of inclusion, the possibility that I overlooked some documents is plausible. Additionally, there may have been IPPO, media, and government sources I overlooked or did not have access to as I explored all possible sources. This research is also the product of a single researcher as necessitated by the dissertation process. Other scholars may have introduced more variation in the coding of documents, identifying different passages or entities in the process.

Policymaking is a complex process with numerous influences and goals. This study focused on only one of those influences—that of narrative and storytelling. This narrow focus did not consider all the other influences that might have contributed to the outcomes of policy processes and rulemaking. Furthermore, I employed only one theory to frame the study. I incorporated NPF theory to direct the study design, coding schema, and analysis of the results for this study. Specifically, the study used NPF at the *meso level*, limiting the focus to the hypotheses and strategies within this level. Of the three strategies associated with this level, scope of conflict, causal mechanisms, and devil/angel shift, the study used only two. I eliminated causal mechanism because the topic of higher education and accreditation, although controversial, does not suggest any intended harm or conspiracy-related causes. The incorporation of this strategy or other policy theories could provide different or complementary results. The single theory provided boundaries and the experience of other NPF scholars to guide the study.

Additional or alternative theoretical perspectives may contribute to different outcomes and implications for the topic.

Finally, in conducting this qualitative study, my intention was to deepen the knowledge of the topic rather than to derive generalizability. Merriam and Tisdell (2016) provide insight into this qualitative research approach. These authors suggest we can learn from a particular situation and then transfer those concepts to future situations. If my readers gain any kind of insight into accreditation reform or the formation of public policy, then this research study was a success, for it is, "the person who reads the study [who] decides whether the findings can apply to his or her particular situation" (Merriam & Tisdell, 2016, p. 256). Despite these limitations, this dissertation research advanced the understanding of how policy actors implement public policy reform narrative strategies and how narrative advances policy issues and contributes to the formation of policy.

Implications

The findings from this study have implications for policymakers, higher education professionals, and contribute to NPF scholarship. In this section, I discuss the implications for policymakers and for higher education based on the results of this study. I also include a discussion on implications and recommendations related to NPF theory.

Implications for Policymakers

This study suggests several implications for policymakers. The first and most evident implication is the recognition that coalitions may adjust their strategies based on external changes to the policy issue climate. In this study, the status quo shifted from a "winning" position to a "losing" position when forced to defend against pending legislation. Early narratives focused on how students could gain from the current

accreditation policies and accrediting agencies positioned themselves as heroes who could resolve any issues. Once Congress introduced legislation that included significant accreditation reform, the status quo coalition began incorporating a focus on how students would face high costs if the legislation passed and began portraying the USDE and the actual legislation (the PROSPER Act) as villains.

This incorporation of villains and victims illustrated a shift in the narratives of the status quo coalition. An awareness of this volatility can support policymakers in better understanding how policy actors may appear to shift their opinions, or seem to be waffling. A shift in strategy may be evidence of a change in information or policy climate. Policy actors may also want to consider how they react to changes. For example, if a status quo coalition incorporates a devil shift strategy along with their opponents, it may result in a more polarized political environment. This climate reduces the possibility that policymakers will find a productive solution. If a status quo coalition could maintain a winner's story, perhaps a more desired outcome could result. When both sides implement a devil shift strategy, the situation results in the use of divisive language and the vilifying of the other side—creating a polarized environment that inhibits progress.

This implication leads to a second implication—the detrimental effect of the language used in devil shift narratives. In order to vilify and show the ineffective nature of the opponent, narratives include adversarial language that can often put up a wall between the two coalitions rather than creating an environment where policymakers can reach consensus. Examples of narrative vilifying accreditors include phrases such as, "accrediting agencies are notoriously opaque" (McCann, 2017); current accreditation practice "has seen massive failures in recent years and fight transparency and oversight

tooth and nail" (Bass, Laitinen, & McCann, 2018). Others report, "the ossified accreditation system does little to connect higher education to the needs of the workforce or give students any meaningful indicator" (Amselem, 2017). Some narrators label accrediting agencies as "cartels" (Amselem, 2018) and the "watchdogs that don't bark" (Flores, 2018). Policy actors incorporate this adversarial language to motivate action, but it often leads to responses that are more defensive and contributes to a cycle of continued negative narrative.

Other scholars have noted the negative consequences of the devil shift strategy for policy actors. Fischer, Ingold, Sciarini, and Varone (2016) suggest this strategy creates an environment of mistrust among actors and strengthens borderlines between coalitions, hampering their ability to find compromise. Lybecker, McBeth, and Stoutenborough (2016) noted that the public policy literature from the last decade provided evidence that groups use narratives to bring a focus to emotions rather than evidence. These studies suggest experts are frustrated with the power of policy narratives and the divisiveness they create. The outcomes from the 115th Congress, the case study for this research, reinforce this effect. During the two years of this legislative session, Congress was unable to come to consensus and reauthorize the already overdue Higher Education Act. The implication for policymakers is clear. If policymakers were truly interested in moving legislation forward, a focus on solutions and heroes would be more productive than a focus on villains and problems. Although probably not an intended outcome, an alternative perspective could identify the stalemate brought on by the divisive environment as a "win" for the status quo coalition since change was ultimately delayed.

Finally, the use of narrative in policy prioritization and formation reveals issues of power and influence. This study demonstrated the influence of IPPOs in setting the stage and preparing for accreditation reform. The use of narrative strategies and the sheer number of narratives produced by these intermediary organizations elevated the issue of accreditation reform and influenced the formation of the subsequent legislation. Unseating the status quo takes time, energy, and sufficient social capital to "weather the suspicion and derision of the defender of the status quo" (Schulz, 2010, p 130). Many IPPOs bring the necessary social and financial capital to move their agendas forward, influencing policymakers and their constituents (Natow, 2015).

Policymakers need to ensure student and family voices do not get lost in the debate. These stakeholders can find themselves caught in the middle and marginalized when the power and influence of persuasive actors is unbalanced with rational and evidence-based information. In a strongly worded PBS article decrying the potential harm of accreditation reform, Binkley (2018) quotes John King, Jr., former education secretary under the Obama administration, "the Trump administration is once again choosing the interests of executives and shareholders of predatory for-profit higher education institutions over protecting students and taxpayers" (para. 16). This narrative uses underrepresented populations as evidence for the maintenance of the status quo. Conversely, the pro-reform narratives focused on the attainment gap and used it as evidence for the necessity of reform. One think tank, Center for American Promise, consistently referenced equity in their rational for accreditation reform (Flores, 2018; Miller, 2017b; Miller & Hatton, 2017). An example narrative stated, "existing accountability measures and structures overlook the most worrisome problems facing

higher education today. For instance, no part of the federal system currently addresses issues directly related to equity" (Miller, 2017b, p. 3). The implication for policymakers is two-fold. First, a need exists to continue to tell the stories of underrepresented students and families; second, we need to acknowledge the off-balance of power and privilege associated with the influence of well-resourced IPPOs.

Implications for Higher Education

The findings from this study suggest several implications for higher education institutions and professionals. As discussed in the prior policymaker implications, the nature of a recurring devil shift strategy creates a divisive environment leading to a lack of policy direction. In this turbulent policy environment, higher education leaders must be nimble and prepared for continual change. The inability for Congress to reauthorize the HEA means policymakers often resort to alternative methods such as negotiated rulemaking to affect change. The negotiated rulemaking process focuses on specific higher education policies and is implemented by the USDE rather than needing to move through the legislative process. Agency leaders implement these regulations more quickly, creating an unstable regulatory environment (Natow, 2015).

Additionally, this evolving regulatory environment impacts the daily work of higher education professionals. When regulations change from year to year, it can cause administrators to have a "wait and see" attitude, delaying necessary changes or innovation. The ambiguous environment also contributes to increased workload. Higher education professionals at all levels have had to spend additional time documenting results and reviewing data. An example from 2019 was the USDE requirement for the College Scorecard to provide program level outcomes. This regulation significantly

increased data submission requirements on colleges and universities. The USDE required outcome and employment data for each program offered by the institution.

Considering the results of this study, it is evident that reform is imminent under the current administration. The strength and persistence of IPPOs and the Trump administration was apparent as the 115th Congress ended. In early 2019, through negotiated rulemaking, the USDE, led by Secretary of Education DeVos, continued their mission to undo the work of the Obama administration and implement radical change in accreditation. Kreighbaum (2019) reported that the pending regulation would create "huge disruptions for the regional accreditors" (para. 2). An example of the disruption includes a change that would realign the geographical boundaries of accreditors, creating chaos for institutions and accreditors. When higher education leaders must traverse rough and ever-changing waters, there is an associated opportunity cost. The expenditure of time and resources needed to address new accreditation regulations takes leaders away from more productive student success initiatives and innovations. Additionally, these regulations contribute to increased costs connected to the mounting data reporting needed to demonstrate quality and meet accountability measures.

Based on the results from this study, I also noted an increased influence of IPPOs and government agencies on public policy. Gandara et al. (2017) researched the role of IPPOs in performance-based funding and also determined that "although intermediaries do not have direct authority over states or higher education institutions, they are able to exercise power over higher education institutions and even states by providing incentives or shaming institutions into compliance" (p. 713-714). IPPOs are significant actors in moving accreditation reform forward. These well-funded organizations produce slick

reports filled with data that are instantly available and narrative that is strategically written to motivate policy actors to action.

The data from this research focused on accreditation reform policy; however, higher education leaders find IPPOs influential in other areas. In 2018, IPPO agendas included not only accreditation reform (Lumina, 2017), but also a completion agenda (Harbour & Smith, 2016) supported by the Lumina and Gates funded IPPO Complete College America (CCA). Another agenda item, the elimination of remedial education, also supported by the Gates Foundation and CCA, has led to state policy in Connecticut and 2019 legislation in Colorado that dictates how higher education institutions implement remediation (H. 1206, 2019; Mangan, 2013). Higher education leaders would benefit from staying current on the narrative produced by IPPOs related to higher education issues. The influence of these well-funded entities is significant and they are often effective in advancing their agendas via legislation to strong-arm higher education institutions.

Finally, in addition to the influence IPPOs have on the prioritization of policy issues, the findings from this study suggest the federal government is imposing a larger role in quality assurance and accountability. Evidence of this shift is found in an increased interest in regulating the regulators and in federal rating systems such as the College Scorecard (Kelchen, 2018). A highly regulated federal climate diminishes the autonomy higher education institutions have experienced for the last two centuries (Barnhardt, 2017). As mentioned in Chapter 2, the U.S. Constitution separated higher education regulation from the federal government. Recent federal administrations have found workarounds through leveraging accreditation policy and negotiated rulemaking.

Higher education leaders need to remain vigilant in monitoring state legislation as well as federal legislation and rulemaking.

Theoretical Implications

The implications for policy theory are many. First, an important aspect of theory is relevant here—theory not only guides the study by identifying possible themes and outcomes, it also serves to provide context within which readers can come to a greater understanding of the study results and outcomes. Additionally, using a theory to frame a study creates boundaries related to data collection, formulates the coding schemas, and focuses the researcher on specific results. In this particular study, the public policy theory NPF proved to be an ideal tool for informing all aspects of the study from the research questions to the study design, through the data analysis, and finally the findings and conclusion. St. John and Parsons (2004) suggest we need to "move from an abstract use of theory to explain the policy process to a pragmatic use of theory to advocate for better-informed policy choices" (p. 9). The theoretical findings in this study informed NPF scholars with a means to advance the theory and provide additional resources for future NPF research.

Two specific implications can inform NPF scholars. First, the alignment with NPF hypotheses suggests this policy theory is informative outside of highly contested environmental issues. This finding implies an opportunity exists to incorporate NPF in additional policy studies. Second, NPF scholars must continue to refine and develop the theory. NPF provided a strong foundation for this study, but as reflected in the findings, NPF scholars need to: 1) address the labels of "winners" and "losers" to better define

when coalitions implement a scope of conflict narrative strategy, and 2) consider

expanding the cast of NPF characters to include beneficiaries.

Throughout this dissertation, the explanation and clarification of the definition of

winners and losers was necessary. The potential frustration for readers resulted from a

lack of a clear or standard definition for identifying a winning or losing coalition. I

purposely moved away from these labels in this study and identified coalitions by status

quo and pro-reform. When two coalitions are in opposition, it is not always readily

evident which coalition is winning and which is losing. Until accreditation reform

legislation actually passed (or did not pass), one could not clearly identify which side

"won." In true alignment with the NPF, a winner consistently incorporates heroes and the

angel shift, while the loser consistently incorporates villains and the devil shift. While the

results of this study show a propensity for both coalitions to follow the prescribed

strategy, it was also clear the winning (or status quo) coalition also incorporated the devil

shift and the use of villains relatively frequently.

The inclusion of a binary: winners and losers, may not adequately reflect the

actual experience of policy actors and coalitions. The narratives analyzed throughout this

research demonstrated that policy actors often modified their stance based on a variety of

factors. New information, the introduction of legislation, and the introduction of new

policy actors appeared to cause individuals and coalitions to shift their narrative

strategies. Policy actors are known to change their preferences and objectives based on

experience (Wildavsky, 2010). The implication for NPF scholars is a need to re-evaluate

the factors that are involved when a coalition decides to implement the angel/devil shift

strategy. These factors could then better define why a coalition selects one strategy over the other and replace the current winner/loser definition.

NPF scholars have traditionally used the archetypal characters of hero, victim, and villain. However, while coding the documents for analysis, it was apparent early in the process that many of the narratives included the use of beneficiaries in addition to victims. Beneficiary characters were individuals who could benefit from the current accreditation policy, or from new and reformed policy. In reviewing pro-reform documents, 40.2% of them included a reference to at least one beneficiary, and the review of status quo documents indicated 38.5% of their narratives mentioned at least one beneficiary. The use of beneficiaries as a character type could add depth to the use of characters in the theory. Weible et al. (2016), in their study of climate and air issues in Delhi, India, also focused their study on enhancing the precision and clarity of the study of policy narratives. These researchers came to the same conclusion and suggested that an additional development of the NPF would include a new character—the beneficiary. Weible et al. suggest, "policy narratives involve the quintessential elements of politics about who is to blame, who suffers, and who *benefits*" [emphasis added] (p. 420). The results of Weible et al. (2016), Gottlieb et al. (2018) and this current study indicate an opportunity exists to advance the NPF theory by adding a fourth character type.

Discussion

I begin a discussion of the study by revisiting where this dissertation started. The tale of accreditation reform is a story that includes heroes, victims, and villains and its origin story is the 2006 Spellings Report (USDE, 2006). This report opened the accreditation reform conversation. Its authors came from a variety of backgrounds, but

included the voices of industry, think tanks, and for-profit institutions along with higher education leaders. This commission not only pulled back the curtain to display the mechanics of higher education, but it also exposed the tender underbelly of higher education accreditation practices that included peer review, outdated regional boundaries, accountability that focused more on improvement than quality, and a controversial gatekeeping role. The report vilified accreditors with language that included "inadequate transparency," "no comprehensive strategy," and "significant shortcomings" (USDE, 2006, p. 13-14). The report concluded with a call for a revitalized postsecondary system, stating, "the future of the country's colleges and universities is threatened by global competitive pressures, powerful technological developments, restraints on public finance and serious structural limitations that cry out for reform" (USDE, 2006, p. 270). From this origin story, accreditation reform has experienced over a decade of discourse.

Public Policy and Policy Actors

This discourse is dominated by well-funded IPPOs. Powerful think tanks that include the American Enterprise Institute, Center for American Progress, and The Brookings Institute were created as vehicles for powerful and wealthy individuals and families to move their agendas forward. These modern-day philanthropists use language that speaks to legislators. They reference diffused costs and benefits, susceptible victims, and evil villains to pull at the emotions of policymakers to incite action. These organizations come to the table with noble intentions and high aspirations, but they also have a single focus and limited experience in higher education and accreditation. Additionally, coalitions often have long-term objectives. The strategies they implement year-to-year lay the groundwork for an even more significant goal to change the face of

higher education by compromising the role of accreditors. There is evidence in the narratives of this study that coalitions are opportunistic, waiting for the right policy actors within the legislature, or a change in the White House. Multiple references to the Obama Administration and the Trump Administration, portraying both as villains and heroes, demonstrates at least an awareness of how a progressive or conservative administration can impact progress toward short- and long-term goals.

I am concerned that the unintended consequences of these well-meaning agendas and long-term plans could result in unintentional harm to students and could negatively affect the quality of a postsecondary education. For example, through accreditation reform, many of the pro-reform IPPOs wanted to open the flood gates of Title IV funding (federal financial aid). They wanted to allow access to these dollars to fund organizations like boot camps and private training facilities. As an example, proposals from the Trump Administration, introduced after I had concluded data collection, included reduced levels of accountability for new programs and faculty qualifications (Kelderman, 2019b). I can appreciate their enthusiasm for expanding the reach of educational opportunity, but without the oversight of the academy and faculty, not to mention accreditors, it is unlikely the quality of these programs could withstand the test of time and provide students with the necessary knowledge, experience, and foundation that have been the cornerstone of a higher education experience.

Policy prioritization and formation. The primary impact of IPPOs is in the prioritization of policy issues. Prior to the release of any legislation, significant content is introduced by IPPOs. Primarily think tanks, these policy actors produce extensive materials to support their agendas. These narratives typically come in the form of

professional-looking reports that include data supporting their positions. These documents are freely available on the Internet and are often referenced in emails that consolidate current news in higher education. For example, *Inside Higher Ed, The Chronicle of Higher Education* and the Lumina Foundation send out daily summaries of stories, and include information produced by think thanks. These emails reach legislators, higher education leaders, and other policymakers. Think tank narratives are typically written by staff writers and frequently the same topic appears in multiple documents, allowing these organizations to flood the market. With less frequency, government agencies may gather a task force or committee to research a topic and create a report. The USDE released *Rethinking Higher education: Accreditation Reform* (USDE, 2018b) and the U.S. Government Accountability Office issued *Higher Education: Expert Views of U.S. Accreditation* (Government Accountability Office [GAO], 2017). These reports are examples of policy narrative that contributed to the prioritization of accreditation reform as a policy issue.

It is noteworthy that the issue prioritization of accreditation reform did not emerge from the field itself. There is a dearth of narrative from accrediting agencies and higher education leaders prior to the introduction of legislation. IPPOs were the primary advocates for reform, those organizations highly funded and resourced via large foundations such as the Lumina Foundation, Bill & Melinda Gates Foundation, and the Koch Family Foundation. Higher education leaders and other policy actors need to be aware of this trend. In addition to accreditation reform, these organizations are addressing higher education reform on several fronts including performance funding, the elimination of developmental education, and an increased focus on career-oriented education. These

new philanthropists are more intentional than philanthropists of the past. They hire experienced writers and researchers, and they build coalitions with others who have similar political agendas to leverage their donations.

In addition to published documents, IPPOs contribute to policy prioritization by hosting convenings, single-issue meetings, and events (Orphan et al., 2018). These conversations and narratives propel higher education to continue to move forward, to step back and look at what is working and where policymakers have opportunities for change and growth. It is important is to ensure all voices are at the table. IPPO leaders, policymakers, students, and higher education advocates need ongoing forums where all voices are heard. The challenge is the uneven distribution of power and resources. As this study confirmed, highly funded and resourced coalition members with reform agendas produce almost three times as many documents as the status quo advocates from less funded higher education trade associations. When some voices hold more social capital than others, an associated imbalance exists. The institution of public policymaking, similar to higher education, consists of a dominant culture. Organizations made up of wealthy and white individuals use purposeful language to perpetuate and legitimize its values and knowledge (Serna & Woulfe, 2017). To address this gap, we need to continue to address these concerns of stratification in public policy discourse.

Policy actors. The narratives from governmental policy actors emerged after the issue had been prioritized. Legislators reached out to a wide range of constituents to gather information before writing the draft legislation. Hearings were held and it was at this point that higher education leaders typically got involved. In reviewing the testimony from this study, policy actors internal and external to higher education contributed. They

used persuasive language and backed up their arguments with data that supported their

positions. For example, the April 25, 2017 hearing on *Strengthening Accreditation to*

Better Protect Students and Taxpayers included testimony from universities accredited by

regional accreditors, but also from for-profit institutions accredited by national

accreditors. For legislators that do not have a foundation in higher education policy, the

testimony can be convincing. All these external voices have significant influence on the

formation of the impending legislation.

The focus of accreditation reform has been myopic. By consistently focusing on

the student, pro-reform advocates have neglected a discussion of other important

components of higher education. Faculty members at universities across the country

advance the scholarship of their fields through research and writing. Medical

breakthroughs and the development of new knowledge are key aspects of the U.S. higher

education system. Policy actors external to higher education often neglect these important

aspects and put an overemphasis on teaching. The findings in this study related to

narrative and the focus on the "loser's tale," demonstrated this focus on teaching and the

student as victim. In addition to the victimization of students, pro-reform actors vilify

those who advocate for maintaining the status quo, using this narrative strategy as a tool

to manipulate and persuade. Gellman-Danley provided additional evidence on this

student focus (Baime, Phelan, Amato, & Gellman-Danley, 2019). She shared her

frustration when, during a negotiated rulemaking session on accreditation, USDE

representatives inferred the Department was looking out for students' best interest, and

suggested the accreditors in the forum were not (Baime et al., 2019). A focus on the

student as a vulnerable victim is a narrative strategy that policy actors continue to use.

Students are a fallback, a last resort, when narrators have no other case or when one side

feels they are losing a battle. Just as external policy actors neglect to cover the full

breadth of contributions such as research and scholarship in higher education discourse,

these actors may find the intricacies of accreditation daunting. Policy actors outside of

higher education have little patience for these details and continue to emphasize only the

student experience.

Outlook

The hyper-attention associated with accreditation reform will more than likely

continue until Congress is able to reauthorize the HEA. The aftermath of accreditation

reform, upon the completion this study, was a session of negotiated rulemaking initiated

by the USDE under the Trump Administration. Negotiated rulemaking is a complex

process and is the only way to make changes to Title IV regulations (the section of the

HEA that addresses accreditation and federal financial aid) outside of a reauthorization.

This session of negotiated rulemaking ran from July 2018 through April 2019. The USDE

attempted to address accreditation deficiencies with significant reform proposals. These

proposals included the end to regional accreditors by replacing them with a national

agency or the possible reorganization of the regional accreditors by adding or subtracting

states (Kelderman, 2019a). When reporting on the outcomes of the rulemaking at a

national conference, Gellman-Danley stated that the initial focus of the USDE was a push

to deregulate, a stance supported by many legislators. Gellman-Danley also shared how

the current administration was for-profit friendly, only cared about business, and had

little respect for shared governance and the liberal arts (Baime et al., 2019). In the end,

the status quo was maintained on almost all issues. Some of the regulations were so

divisive they had to be dropped. Others so extreme, they did not stand a chance of moving forward. The only accreditation changes that resulted from the process was that accreditors would have additional flexibility in working with institutions when needed such as natural disasters or changes to state licensure requirements (Lieberman, 2019). What these examples demonstrate is that changes to accreditation are imminent, but that more than likely the reform will be incremental. The momentum from the pro-reform coalition is strong; but as the research demonstrates, unseating the status quo takes significant time and resources.

As higher education enters the next decade, corporate America, government agencies, and constituents will continue to apply pressure. This pressure will continue to shape and form higher education like a crucible shapes its molten metal. The direction of higher education will be the result of these outside forces combined with internal innovation to pave the way for the next generation of higher education leaders. These leaders will need to provide the necessary vision and leadership necessary for institutions to advance human knowledge and address the needs of the next generation of students.

Concluding Remarks

Accreditation reform is imminent. It is no longer productive to discuss whether it will occur. Higher education leaders need to invest time in preparing for reform and ensuring they have a voice in the outcomes. Narrative strategies are effective in prioritizing issues and in the formation of policy designed to improve higher education outcomes. Leaders within IPPOs, media, and the government influence the future through their language and narrative strategies. Because of the power inherent in narrative, we need to always consider the implications of the language we use, the narratives we

produce, and the ways in which we use our privilege, our wealth, and our social capital. In the case of accreditation reform, this shift in approach is critical as it has the potential to have long-term consequences for the lives and futures of our students and institutions.

Future Research

"Scholars must continue to invest time and resources in policy research that offers relevant and applicable interventions leading to greater student access and success" (Dar, 2012, p. 788). This study advances the research of higher education public policy research and the role of narrative. As Dar (2012) suggests, it is important to students, higher education leaders, and policymakers for scholars to continue to evaluate public policy processes. This study looked at public policy through an NPF lens. Future scholars may want to advance this work by incorporating other public policy theories or combining theories in the study of how policy actors use narrative to advance their agendas; and how IPPOs, governmental agencies, and media use narrative to influence policymakers.

Two public policy theories are complementary to NPF. The first is Advocacy Coalition Framework (ACF). ACF not only addresses coalitions, but also adds an emphasis on the beliefs coalitions hold and share with others. This focus on beliefs suggests actors from the same coalition will have substantial consensus on issues, even setting some of their own beliefs aside to support the beliefs of the coalition (Jenkins-Smith, Nohrstedt, Weible, & Sabatier, 2014). Additionally, ACF has a focus on policy change, an attribute that would support a study on policy reform. The second theory is Multiple Streams Theory (MST). Scholars use MST to examine policymaking and issue reform (Zahariadis, 2014). This theory defines three independent streams at work in

policy development that lead to policy formation. A policy window opens when a policy problem coincides with a policy entrepreneur, typically resulting in new policy. Future research in accreditation reform could include viewing data and results through a cross-theory lens that includes the coalition belief systems associated with ACF and the process components of MST. Additional information could emerge in examining how policymakers share and advance beliefs through narrative. Researchers could incorporate MST by identifying references to policy problems and policy windows, a logical complement to the hero/villain analysis in NPF where heroes solve problems and villains create problems.

Scholars may also want to consider how the hypotheses and strategies associated with NPF theory connect to how humans respond generally to narrative and then more specifically to narrative written with the intent to influence policy. The results of NPF research strongly suggest we influence each other, not with facts and data, but with a good story. In examining the role NPF theory played in this study, it became clear to me, as it has for other NPF scholars, that the use of narrative to influence is reminiscent of behavioral psychology and neuroscience theories (Westen, Blogov, Harenski, Kilts, & Hamann, 2006; Smith & Larimer, 2013). Combining NPF theory with theories from these fields could provide researchers with information on why policymakers turn to the devil shift strategy to influence and why it appears to have a stronger influence than the angel shift strategy. There may be an opportunity for NPF scholars, with a better understanding of the psychology and neuroscience components of how people respond to narrative, to address the detrimental devil shift strategy and move toward narrative that seeks to unite and bring consensus to political issues.

Scholars could add depth to the findings of this study by 1) examining additional higher education reform issues, and 2) extending the length of the study. In the first instance, it would be interesting to look at other educational reform legislation such as gainful employment, state defunding, supplemental instruction, and performance-based funding. Overlaying results from studies of these issues could confirm or disprove the findings of this study, namely the early influence of IPPOs and governmental agencies, and the reactive response associated with the media. A second strategy for adding depth in future research would be to extend the length of time for document collection. The 115th Congress bounded this study; however, authors produced a significant amount of narrative in the prior two years that focused on accreditation reform. An analysis that included these earlier narratives might provide additional insight.

The data collected for this study were comprised of traditional communication documents that included reports, news articles, hearing testimony, and opinion pieces. The study did not include social media narrative. Future research could incorporate the narrative associated with social media to examine if the NPF theory hypotheses remain consistent with narratives from these sources. Scholars could examine narratives from Twitter, Facebook, LinkedIn®, and other social media outlets using the themes associated with NPF. This examination could lend additional information to how policymakers use narrative to prioritize a policy issue and contribute to policy formation.

Finally, this study revealed some inconsistencies in the NPF theory. Additional studies that focus exclusively on the devil/angel shift could provide more detail on when and why coalitions implement this strategy. NPF currently suggests coalitions elect either the devil shift of the angel shift. This study found coalitions might change strategies

based on a variety of circumstances or environments. Research that examines this possibility could advance the NPF theory and provide additional advantage for researchers studying public policy. Scholars could also explore the presence or absence of a beneficiary character in policy narratives to determine if there is a consistent use of this character and the role it plays in influencing policy actors and the public.

Conclusion

This study provides the fields of higher education and public policy with insight into the complex workings of the use of narrative in public policy reform. The work of policy reform, moving policy away from the status quo, requires diligence and resources. The results of this study demonstrated the status quo coalition remains relatively steadfast, working to constrain the amount of information and reminding policy actors of how accreditors are the solution, the hero, and insist change is not needed. Coalitions determined to reform accreditation policy use a different set of tactics. They expand the conversation, point to high costs, and use strong language to incite action. In a twist of events, like any engaging story, our hero comes up against reform legislation and the tables turn. In an effort to discredit their opponents, the status quo coalition shifts their narrative strategies to vilify the reform efforts.

"This decade has been one of the most reform-rich periods in the history of higher education" (O'Banion, 2019). I would suggest accreditation reform tops that list and is representative of an increased regulatory environment. According to Goldrick-Rab and Stommel (2018), the American public loves to hate higher education and many people associate it with high costs, a lack of accountability, and an absence of innovation. This dissertation provides a window into the complex world of public policy, an examination

of how policy actors use narrative to influence the process, and information on how the narrative strategies incorporated may actually work to hinder the passage of reform legislation. Fischer et al. (2016) remind us, "a non-collaborative attitude and mistrust between actors jeopardize the elaboration of effective policy solutions" (p. 309-310). The inability of the 115th Congress to pass legislation to reauthorize the HEA is evidence of this non-collaborative attitude and mistrust.

This dissertation presents a case study that informs the use of narrative strategies in public policy discourse. Higher education leaders and policy actors would benefit from monitoring IPPO narratives, recognizing they will play an influential role in prioritizing higher education policy issues. An opportunity may exist for these leaders to leverage the resources of IPPOs through collaboration. Higher education professionals can provide additional input on the needs of students, faculty, and higher education's underlying commitment to quality. Continued engagement in public policy debate and advocacy for current higher education issues is critical work for higher education leaders. Additionally, the outcomes of this study serve as a reminder of the negative impact that comes from a divisive climate. When coalitions use NPF's devil shift strategy, the impact can be detrimental. This strategy incorporates the use of villains, victims, vilifying opponents, charged language, and a focus on the "loser's tail." In this negative climate, consensus becomes close to impossible and moving coalition agendas forward takes priority over writing policy to support our students and the advancement of higher education. In the aftermath of this study, the public policy narrative around accreditation reform continues to be adversarial. Until legislators return to a climate of cooperation, it is highly unlikely we will see a reauthorization of the HEA anytime soon.

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