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A Supporting Role: How Accreditors Can Help Promote the Success of Community College Students

By Radha Roy Biswas

An **ACHIEVING THE DREAM** Policy Brief

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ACHIEVING THE DREAM: COMMUNITY COLLEGES COUNT is a national initiative to help more community college students succeed (earn degrees, earn certificates, or transfer to other institutions to continue their studies). The initiative is particularly concerned about student groups that have faced the most significant barriers to success, including low-income students and students of color. *Achieving the Dream* focuses colleges and others on understanding and making better use of data. It acts on multiple fronts, including efforts at community colleges and in research, public engagement, and public policy.

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A Supporting Role: How Accreditors Can Help Promote the Success of Community College Students

Introduction and Summary

For over a century, voluntary institutional accreditation, rather than regulation, has been the primary means of assuring quality in higher education in the United States.¹ It is mainly through accreditation that colleges and universities establish their reputation among different stakeholders—students and parents, employers, other educational institutions, funders, and policymakers. Accreditation processes are used for self-improvement and for targeted planning for future institutional development. Accreditation enables institutions to determine whether a credential from another institution or courses taken elsewhere are of sufficient quality to be accepted. Accreditation helps consumers assess the quality and stability of higher education institutions. And accreditation is a precondition for an institution’s participation in federal aid programs for its students.

More than 3,000 of the nation’s higher education institutions are recognized and assessed through regional accreditation. This is a voluntary, peer-review process, managed by regional organizations that are run by their member higher education institutions (Council for Higher Education Accreditation 2006). In the United States, for historical reasons, there are six regional accreditation agencies, housing eight higher education commissions. Standards used in accreditation processes vary from one region to another. Regardless, the standards are meant to ensure quality and promote institutional self-study and self-improvement while being flexible enough to assure the quality

of the great variety of U.S. higher education institutions (Council for Higher Education Accreditation 2004).

As the movement for accountability in higher education has gained momentum, criticism of the regional accreditation process has become more frequent and louder. In recent debates on reauthorization of the Higher Education Act, Congress questioned the effectiveness of accreditation as an accountability system. More recently, the Secretary’s Commission on the Future of Higher Education triggered a firestorm of debate in spring 2006 with the publication of *The Need for Accreditation Reform* (Dickeson 2006). However, criticism of accreditation is not entirely new. In 1992, amendments to the HEA almost disestablished accreditation as a recognized player, and there was interest in a proposal to create a national accreditation agency under the leadership of the American Council on Education.

These and other critiques of accreditation tend to focus on the limitations of a self-regulatory system in driving improved outcomes, controlling costs, and improving efficiency and quality in higher education. Accreditation is characterized by some as archaic and complex—a kind of secret society—that could be more effective if the existing system were replaced by a federal agency with direct oversight.

Many stakeholders—including colleges, policymakers, and the accreditors themselves—defend the basics of

the existing system by arguing that institutional accreditation is inevitably complex and must stay flexible if it is to achieve its many goals. Institutions vary significantly in terms of capacity, goals, missions, and operations, making the establishment of benchmarks and standards difficult, even counterproductive. The key in accreditation, they argue, is to find a balance: setting standards that can guide the institutional review process in clear directions, while preserving institutions' individual missions and objectives.

The focus of this brief is student success: To what extent can the accreditation process drive significant improvement in student persistence and completion at institutions that undergo the peer review process, particularly for students from groups traditionally underrepresented in higher education? Because this inquiry is in service to *Achieving the Dream*, a national initiative on community college student success involving nine states and fifty-seven community colleges, our particular interest is accreditation as it plays out in the community college sector. We ask:

- Can accreditation be an effective lever for institutional improvement in the area of student success?



- Given current standards and procedures across the regional accreditation agencies, by what mechanisms can the accreditation process support and accelerate institutional change efforts that focus on retention and completion?
- Can regional accreditation agencies do more—in terms of standards, procedures, guidance, or other actions—to help institutions tackle the difficult challenges of improved student outcomes?

Jobs for the Future began this inquiry because of two trends that pointed to the potential of the accreditation process to contribute to the goal of institutional change that is at the heart of *Achieving the Dream*:

- The regional accreditation bodies have been revising their standards during the past decade or so, becoming more explicit about the importance of student outcomes to the self-assessment and review process. How is the updating and revision of standards for accreditation affecting institutions' analyses of their strengths and weaknesses and their improvement plans and actions?
- Several community colleges participating in *Achieving the Dream* have undergone their accreditation process while part of the initiative. This provides an opportunity to take a look at how institutions that are clearly motivated to improve student outcomes use the accreditation process. Is accreditation an important lever for institutional improvement that targets outcomes? What lessons can be gleaned from the experience of these colleges about the potential and the actual role of the accreditation process in supporting or leading a process of institutional improvement focused around better retention and completion?

To pursue these questions, JFF took a close look at the standards related to student success that the regional accreditation agencies have added or revised in recent years. We also examined the ways in which several *Achieving the Dream* colleges have used recent accreditation reviews to help them advance the agenda of improved student success. Third, we brought together the CEOs of almost all the regional accreditors and leaders from a number of *Achieving the Dream* col-

leges to discuss challenges and opportunities for accreditation to play a stronger role. Additional information comes from accreditation agency publications and handbooks of standards and criteria; publications from the U.S. Department of Education, the Council for Higher Education Accreditation, the Council of Regional Accrediting Commissions, and others; and interviews with *Achieving the Dream* college officials, evaluators, and accreditors.

Our conclusions from this initial research encourage us to pursue these issues further. Accreditation does not appear—by itself—to be a strong enough lever to drive higher education institutions to make student success the core of their review and improvement plans. The standards—even the new ones focused on success—are not designed to be prescriptive of institutional priorities for and measures of improvement. The accreditation bodies' emphasis on flexibility in the face of varied institutional missions and contexts, combined with the commitment to institutional self-assessment and peer review, makes the process more one of internal focus and planning than of external specification of priorities.

At the same time, the accreditation process, with its emphasis on institution-wide review and planning guided by top leadership, clearly provides tools, opportunity, and processes that leaders can use to move complex and difficult change throughout their institutions. Colleges can also use accreditation effectively to support and accelerate attention to, and action on, an institution-wide student success agenda. The review process's greater attention in standards to outputs and outcomes, rather than inputs and processes, coupled with an emphasis on a culture of evidence and inquiry, creates an opening that interested institutions can use to advantage. The recent introduction of explicit quality improvement mechanisms to the accreditation processes in two regions—the South and the North Central states—provides an important foundation for institutions to make data-driven institutional change the core of those processes and to diffuse the change process broadly through institutions' divisions and departments—goals that are consistent with the data-driven change model of *Achieving the Dream*.²

Several *Achieving the Dream* colleges have leveraged their data collection for the initiative and the self study required for accreditation to direct institutional attention and resources toward improving specific student outcomes, such as success in remedial education courses or success rates for low-income, minority students. While accreditation standards typically do not mandate any special attention to outcomes for low-income and minority students, the colleges' involvement with *Achieving the Dream* has allowed them to focus the institutional lens on these issues, while at the same time fulfilling accreditation requirements. Most important, accreditation has provided a tool for college leadership to build consensus around decisions and plans of action and to strengthen the institutional infrastructure needed to implement plans.

JFF prepared this brief to spark discussion with regional accreditors, community colleges, researchers, policymakers, and others interested in identifying and strengthening external levers that can complement and accelerate internal institutional change processes. We have been encouraged by the interest that leaders of regional accreditation bodies have expressed in continuing the dialogue and exchange with *Achieving the Dream* colleges and partners.



A Guide to Accreditation

Structure

There are two types of accreditation in the United States: institutional and program-specific (also called “specialized”).

The regional accrediting agencies are the primary bodies that accredit entire institutions. Regional accreditors perform a number of common functions: assuring academic quality to students and the public; providing access to federal funds (e.g., student grants and loans and other federal support); easing transfers across colleges and universities; and engendering labor market confidence in the value of credentials.

The regional accrediting agencies operate in six clusters of states (see Table 1). They review entire institutions, 97 percent or more of which are degree-granting, non-profit institutions. While regional accreditors may be active in K-12 and higher education sectors, their commissions for higher learning focus on postsecondary education. Two of the six regional accrediting agencies have separate commissions for different sectors in higher education, so there are a total of eight higher learning commissions.

Of the eight, seven review and accredit both community colleges and four-year institutions. The Western Association of Schools and Colleges has two commissions, one for junior and community colleges, another for senior colleges and universities. The New England Association of Schools and Colleges has two commissions, one for community colleges and universities and another for career and technical schools.

In addition to the regional agencies, six national accreditors review private, for-profit, degree- and non-degree-granting institutions, including faith-based organizations. Many are single-purpose institutions focusing on adult learning or training institutions with programs in business and information technology.

The specialized or programmatic accrediting agencies serve specific programs or schools, such as law, medical, and engineering schools and programs, as well as health profession and other industry-specific programs.

There are currently about 60 professional accreditation agencies, and the number is growing.

The six regionals and their higher learning commissions operate autonomously, but they are accountable to the Secretary of Education’s National Advisory Committee on Institutional Quality, which reviews and approves their practices and policies on a five-year cycle, based upon published criteria. Approval by the National Committee is necessary for students at accrediting bodies’ member institutions to be eligible for federal financial aid under Title IV of the Higher Education Act (Terkla 2001).

Although they are largely independent of one another, some non-governmental agency has coordinated the accreditation agencies for more than 50 years. Currently, this role is played by the Council on Higher Education Accreditation, a membership organization of educational institutions created after 1992 amendments to the Higher Education Act to improve communication between institutions and accreditors. CHEA replaced an association of accrediting organizations that dissolved in the late 1980s. CHEA performs a number of tasks, including but not limited to: working with Congress on legislation affecting accreditation; conducting research on the accreditation function and the development of tools to help accreditors do their jobs better; and coordinating and facilitating communication among accreditors.

CHEA has established its own recognition policies and procedures for accreditors, with a focus on improving accountability (Council of Higher Education Accreditation 2006a). Recognition from CHEA provides status and legitimacy to an accrediting agency. Because universities and colleges are the primary members of CHEA, recognition of an accrediting body by CHEA effectively implies recognition of its member institutions (Werner 2004a).

The regional higher education commissions also coordinate their activities through a voluntary Council of Regional Accrediting Commissions. The council serves as an informal networking and peer learning forum.

Table 1: Regional Accreditation and Higher Learning Commissions

COMMISSION	MEMBER STATES
<i>Middle States Association of Colleges and Schools</i> Commission on Higher Education accredits community colleges and four-year institutions	Delaware, District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico
<i>New England Association of Schools and Colleges</i> Commission on Institutions of Higher Education accredits community colleges and four-year institutions	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont
<i>North Central Association of Schools and Colleges</i> Higher Learning Commission accredits community colleges and four-year institutions	Arkansas, Arizona, Colorado, Iowa, Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, Wyoming
<i>Northwest Association of Schools and Colleges</i> Commission on Colleges accredits community colleges and four-year institutions	Alaska, Idaho, Montana, Nevada, Oregon, Utah, Washington
<i>Southern Association of Schools and Colleges</i> Commission on Colleges accredits community colleges and four-year institutions	Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia
<i>The Western Association of Schools and Colleges</i> Accrediting Commission for Community and Junior Colleges Commission for Senior Colleges and Universities	California, Hawaii, Pacific territories

Process

Regional accreditation is not a regulatory process. In fact, regional accreditation arose in the absence of any direct federal authority charged with overseeing educational quality. The system and practice of institutional accreditation through non-governmental, peer evaluation of educational institutions and programs reflects the broad autonomy that institutions of higher education traditionally have had and fought to defend in the United States. Broad standards, rather than narrowly defined assessment measures, are the other hallmark of this system, which works to provide “standards without standardization” in higher education (Council of Regional Accrediting Commissions 2003).

The accreditation process is built upon, and promotes, a process of gradual and continuous improvement through self-study and self-review. It typically begins with a period of in-depth self-study and self-assessment, based on agency guidelines. Every accrediting agency has a published handbook of criteria and standards (mandated by the U.S. Department of Education) and required documentation for institutions to follow

in their self-study and preparation for evaluation. The specific criteria and standards vary from commission to commission.

The self-study usually takes place about a year before a visit by a peer evaluating team. In preparation for that visit, the institution examines its mission, priorities, capacity, practices, and policies. This internal program review involves faculty, staff, students, trustees, and others, and it may include external stakeholders (e.g., employers, community representatives).

The self-study culminates in the review team’s visit, which results in a preliminary assessment. There is a growing trend toward multiple visits in a cycle, with more frequent “interim” visits to follow up on specific issues. Evaluators are selected through a voluntary process: member institutions nominate a review team composed of staff and faculty who are subject experts and experienced in institutional functions. Accrediting agencies provide training workshops and materials to guide the evaluators. The U.S. Department of Education and the regional agencies have policies to avoid conflicts of interest and safeguard the process’s credibility.

Site evaluator reports are reviewed by committees of elected commissioners at the accrediting commission. All commissions draw some members from the political and employer communities, so that decision-making bodies include people from outside higher education and who are particularly attuned to the external environment within which accreditation and higher education institutions function. These commissioners make the final determination of an institution's compliance with accreditation requirements.

The institution is then accredited (or reaffirmed) or faces one of three other outcomes: 1) at the commission's request, the institution may have to make sug-

gested improvements, for which it is reviewed periodically; 2) the institution may be put on probation until certain acute problems are addressed; or 3) the institution may lose its accreditation.

Accreditation typically takes place in six- to ten-year cycles, although newer requirements for continuous improvement by some accreditors specify shorter cycles.



Accreditation Standards and Processes: How Is Student Success Addressed?

Accreditation is guided by standards created and regularly revised by the accrediting bodies. Typically, these standards are broad statements, designed to guide an institution's efforts to develop a rigorous, comprehensive approach to its self-study and review. The standards tend to emphasize the documentation of review processes and strategic planning efforts, as well as the alignment of funding and other priorities with institutional goals and missions. Colleges use this assessment and documentation process to demonstrate their compliance with accreditation requirements, and they craft institutional improvement plans in accordance with both accreditation agency guidelines and their own missions and goals.

An institution's performance and quality are reviewed in accordance with those plans. References to benchmarks are very general: colleges are asked to use commonly accepted standards in their sector. Regional accreditation agencies differ considerably in the extent to which they specify what must be measured in terms of student outcomes and what constitutes adequate evidence of progress and success. This is by design, in the tradition of upholding institutional autonomy and respecting individual institutional goals and missions.

Accreditation agencies must themselves follow standards and guidelines established separately by the U.S. Department of Education and the Council for Higher Education Accreditation. CHEA's requirements are based on standards that include advancing academic quality and encouraging needed improvement (Council for Higher Education Accreditation 2006). The department's standards and criteria for the recognition of accrediting agencies are transferred directly to the standards and criteria for institutional accreditation required by the regional accreditors. The criteria for recognition require an agency's accreditation standards to address effectively the quality of the institution or program in the following areas: institutional capacity and resources, such as faculty, facilities and equipment, and fiscal and administrative infrastructure; student services; recruitment and admissions; and compliance data for student financial aid programs. Most important, one Department of Education criterion explicitly

addresses student outcomes: "success with respect to student achievement in relation to . . . course completion, state licensing examinations, and job placement rates." Institutions can establish additional student outcome criteria beyond this minimum (U.S. Department of Education n.d.). In recent years, this criterion has gained greater prominence in department publications and guides.

Changing Emphasis in Accreditation Standards

The focus of accreditation, as reflected in its standards and criteria, has been changing toward defining institutional quality based on outcomes rather than inputs (Terkla 2001). Across the regional agencies, although to varying degrees, the increased public and policy interest in greater accountability in higher education has prompted this shift in emphasis. Most of the impetus has been external. The Carnegie Foundation for the Advancement of Teaching first pushed for student learning outcomes in accreditation in 1982 (Terkla 2001). In 1999, the Pew Charitable Trusts provided seed funding to the North Central Association of Schools and Colleges to create an alternative, voluntary route to accreditation that put institutional improvement planning at the heart of the process.³ The Southern Association of Colleges and Schools also secured outside funding to orient its standards more toward improvement. Most recently, the push for change has come from the continuing debate on higher education accountability, which has been a theme in Congress during debates on reauthorization of the Higher Education Act.

Regional accrediting agencies have updated their standards and criteria for assessment of institutional performance to make them more sensitive to student outcomes and success (Ewell 1998). Almost universally, agencies now ask institutions to have processes for documenting the answers to questions like: What have students learned? What skills have students developed? Have graduates found jobs? What kinds of jobs?

Table 2 (pages 9–10) summarizes these changes and highlights standards related to student success that

guide institutions accredited by the different accrediting bodies for higher education. This table is descriptive, designed primarily to show how different regional accreditors have adjusted the guidance they give institutions and evaluation teams. How these standards are actually used in any particular accreditation process is a question that requires institution-level research.

Some critics of accreditation argue that these standards and the process by which institutions are evaluated are too weak and generic to drive complex change processes on their own. Other critics point to limitations of the process of accreditation, not just the standards, arguing that the system of voluntary review by “peers” is inadequate to the task of driving greater accountability, because peers lack an incentive to come down hard on colleagues who may someday evaluate their institution. Still others criticize the lack of emphasis on evaluator training, noting that more attention to training, even of the experts who are selected to serve on peer review teams, could strengthen the accreditation process and the clarity and consistency of reviews.

Despite these criticisms, many within higher education have come to see accreditation as an opportunity to reinvigorate and redirect institutional strategic planning and quality improvement in ways that would otherwise be difficult. A recent brief from the League for Innovation in the Community College argues that accreditation creates a structure for important conversations and planning processes around student learning, assessment of effectiveness, continuous improvement, and evidence—the principles of effective practice for any complex change and improvement process (Baker and Wilson 2006).

Institutional Improvement Plans and Programs in Accreditation

Perhaps the most significant recent development in accreditation standards has been the introduction of institutional improvement plans and programs to augment traditional compliance criteria. Two regional accreditors, the Southern Association and North Central’s Higher Learning Commission, have introduced new accreditation processes that put institutional improvement at the core of the entire process. (Middle States has moved more tentatively in this

direction: it offers colleges greater flexibility in their self-study, allowing colleges to choose between a basic, comprehensive study or a more detailed, topic-oriented assessment.) These opportunities represent a new direction for accreditors. Through the continuous improvement plans, accreditors are structuring assessment processes that put greater emphasis on student outcomes and on change processes in colleges.

The revised accreditation criteria of the **Southern Association of Colleges and Schools** include a new core requirement: the Quality Enhancement Plan. The QEP is used to outline a course of action for institutional improvement by addressing one or more issues in student learning that contribute to institutional quality. According to the Southern Association, “Engaging the wider academic community and addressing one or more issues that contribute to institutional improvement, the [QEP] plan should be focused, succinct, and limited in length” (Southern Association of Colleges and Schools 2001). The QEP requires the college to identify an area for improvement, to develop a plan to meet specific, measurable goals, and to engage in ongoing assessment of progress toward completing the plan. Five years following the initiation of the QEP, a college must demonstrate the measurable impact of the QEP on student learning, as defined in the plan. Further, the QEP has to be broad-based and engaging, and it must affect a broad swath of college stakeholders—academic staff, support personnel, students, and the community—in the selection of the plan focus and its implementation.

The Higher Learning Commission of the North Central Association of Schools and Colleges has taken a somewhat different approach to increasing the emphasis on student outcomes in the accreditation process. In 1999, with funding from the Pew Charitable Trusts, North Central introduced a voluntary alternative process for accreditation. Colleges can elect to participate in either the Academic Quality Improvement Program or the Program to Evaluate and Advance Quality. PEAQ resembles the more traditional process, including an institutional self-study process and a comprehensive evaluation conducted by external evaluators. AQIP, which is based on criteria used in the

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Table 2: Accreditation Standards Related to Student Success

Regional Accreditation and Higher Learning Commissions	Recent Changes in Standards	Standards Pertaining to Student Success and Special Populations
<p><i>The Middle States Association of Colleges and Schools:</i></p> <p>Commission on Higher Education</p>	<p>In 2002, 14 new criteria entitled <i>Characteristics of Excellence</i> were established, with seven addressing the institutional context and seven focusing on educational effectiveness. Every accreditation standard includes an assessment component; the assessment of student learning is addressed in Standard 14, and the assessment of <i>all</i> key institutional goals, including those assessed in the other 13 standards, is addressed holistically in Standard 7 (Institutional Assessment).</p> <p>Institutions can choose from different models of self study—comprehensive or topic-oriented.</p>	<p>Standard 14, Assessment of Student Learning, requires evidence of students' skills and competencies consistent with institutional and higher education goals. In a separate handbook, the agency lays out the details for student learning assessment at the course, program, and institutional levels. The commission's standards allow institutions to use numerical or non-numerical measures, and to choose whether or not to use standardized tests, according to the type of learning goals and the educational mission of the college.</p> <p>Standard 9, Student Support Services, asks the institution to demonstrate how the institution's "program of student support services relates to student needs . . . and are available regardless of place or method of delivery."</p> <p>Criteria for Special Populations:</p> <p>Standard 13, Related Educational Activities, addresses programs or activities that are characterized by particular content, focus, location, or delivery—including basic skills or developmental courses. It asks, "How does the institution systematically identify students who are not fully prepared for college-level study? For admitted under-prepared students, is there institutional provision of or referral to relevant courses and support services?"</p> <p>Under the optional analysis and evidence section of Standard 14, Assessment of Student Learning, it asks for: "analysis of direct and indirect indicators of student achievement such as persistence and graduation rates, student satisfaction and other evidence of student goal attainment, licensure examination results, alumni satisfaction and achievement, <i>including consideration of parity of outcomes across different student groups</i> [emphasis added]."</p>
<p><i>The New England Association of Schools and Colleges:</i></p> <p>Commission on Institutions of Higher Education</p>	<p>Revised standards, now numbering eleven, became effective as of 2006.</p>	<p>Three of the eleven standards pertain directly to student learning and success:</p> <p>Standard 4, The Academic Program, requires that the institution work systematically and effectively to plan, provide, oversee, evaluate, improve, and assure the academic quality and integrity of its academic programs and the credits and degrees awarded. The institution develops the systematic means to understand how and what students are learning and to use the evidence obtained to improve the academic program.</p> <p>Standard 4.4, Assessment of Student Learning, requires clear statements of what students gain, achieve, demonstrate, or know by the time they complete their academic program.</p> <p>Standard 6, Students, addresses the issues of admissions, retention, graduation, and the role of support services.</p> <p>Criteria for Special Populations:</p> <p>Standard 6 also addresses the issue of special populations, suggesting that if an institution chooses to recruit and admit specific populations, including remedial students, it must provide support for the success of these populations, and it will be assessed separately on the success of these populations.</p>
<p><i>North Central Association of Schools and Colleges:</i></p> <p>Higher Learning Commission</p>	<p>Revised criteria went into effect in 2005. The five criteria include a new focus on student learning and community engagement, the latter to help institutions address diversity.</p> <p>The HLC has two avenues for institutions for accreditation: the Program to Evaluate and Advance Quality resembles the more traditional accreditation process; the Academic Quality Improvement Program provides an alternative, optional evaluation process structured around quality improvement principles and processes involving a structured set of goal-setting, networking, and accountability activities.</p>	<p>The wording of Criterion 3, Student Learning and Effective Teaching, makes an important shift from emphasizing processes to emphasizing evaluation of evidence. Under Criterion 3, Core Component 3a states that the institution's goals for student learning outcomes must be clearly stated for each educational program, and learning must be assessed at the course, program, and institutional level. It must also report graduation rates, passage rates on licensing exams, placement rates, transfer rates generated, and other outcomes data generated for external accountability.</p> <p>For Core Component 3c, the college must create learning environments that include advising systems focused on student learning.</p> <p>Criteria for Special Populations:</p> <p>The association address special populations indirectly by asking institutions to engage in strategies that address diversity. Criterion 1, Mission and Integrity, asks that a college's mission documents recognize <i>the diversity of its learners</i>. Criterion 5, Engagement and Service, requires that the organization demonstrate its responsiveness to the constituencies it serves, and analyze its capacity to serve their needs and expectations.</p>

Table 2 continued

Regional Accreditation and Higher Learning Commissions	Recent Changes in Standards	Standards Pertaining to Student Success and Special Populations
<p><i>The Northwest Association of Schools and Colleges:</i> Commission on Colleges</p>	<p>The association has identified nine standards for their regional accreditation process. The commission is reviewing its standards for accreditation.</p>	<p>Four standards, Institutional Mission and Goals, Planning and Effectiveness, Educational Program, and its Effectiveness and Students, are dedicated to students and learning outcomes.</p> <p>Standard 1.B, Planning and Effectiveness, requires evidence that demonstrates the analysis and appraisal of institutional outcomes, including studies regarding effectiveness of programs and their graduates; studies that indicate degree of success in placing graduates; and pre- and post-test comparisons of student knowledge, skills, and abilities.</p> <p>For Standard 2.B, Educational Program Planning and Assessment, the institution identifies and publishes the expected learning outcomes for each of its degree and certificate programs, and through assessment, demonstrates that students who complete their programs have achieved these outcomes.</p> <p>Policy 2.2, Educational Assessment, expects each institution and program to adopt an assessment plan responsive to its mission and its needs, with suggested outcomes to be measured, such as intake, retention and completion rates by gender, age, ethnicity, and school of origin.</p>
<p><i>The Southern Association of Schools and Colleges:</i> Commission on Colleges</p>	<p>Revised standards issued in 2001 “must have” compliance statements to four areas of compliance. These include compliance with the <i>Principles of Accreditation</i>, compliance with the Core Requirements, compliance with the Comprehensive Standards, and compliance with additional federal requirements. Core requirements now include the Quality Enhancement Plan used for outlining a course of action for institutional improvement by addressing one or more issues that contribute to institutional quality, with special attention to student learning. The QEP constitutes a significant portion of the accreditation process.</p>	<p>Standard 3.4, All Educational Programs, requires each institution to demonstrate that each educational program for which academic credit is awarded is approved by the faculty and administration and establishes and evaluates program and learning outcomes.</p> <p>Comprehensive standard 2.10 requires that the institution provides student support programs, services, and activities consistent with its mission that promote student learning and enhance the development of its students.</p> <p>There is no special language addressing special populations.</p>
<p><i>The Western Association of Schools and Colleges:</i> Accrediting Commission for Community and Junior Colleges</p>	<p>ACCJC is unique among the regional accrediting bodies in that it only accredits two-year institutions. This is not surprising, given that nearly 10 percent of all community colleges in the nation are in California. Four broad standards were adopted in 2002: institutional mission and effectiveness; student learning programs and services; resources; leadership and governance.</p>	<p>Under Standard IB, Improving Institutional Effectiveness, the institution must demonstrate a conscious effort to produce and support student learning, measure that learning, assess how well learning is occurring, and make changes to improve student learning. The institution must also organize its key processes and allocate its resources to effectively support student learning. The institution demonstrates its effectiveness by providing evidence of the achievement of student learning outcomes and evidence of institution and program performance.</p> <p>Standard II, Student Learning Programs and Services, covers instructional programs, student support services, and library and learning support services. The institution identifies student learning outcomes for courses, programs, certificates and degrees; and assesses student achievement of those outcomes.</p> <p>Criteria for Special Populations: Standard II A requires that an institution identify and seek to meet the varied educational needs of its students through programs consistent with their educational preparation and the diversity, demographics, and economy of its communities.</p>
<p><i>The Western Association of Schools and Colleges:</i> Accrediting Commission for Senior Colleges and Universities</p>	<p>The commission adopted a multi-stage model and new standards of accreditation in 2001. The model addresses two core commitments: institutional capacity and educational effectiveness. To support these core commitments, the commission handbook specifies four new standards that address: institutional mission and assessment of effectiveness; student learning programs and services; human, physical, fiscal, and information resources; and governance.</p>	<p>Standard II, Achieving Educational Objectives Through Core Functions, deals with student learning programs and services. Standard II requires, “Regardless of mode of program delivery, the institution regularly identifies the characteristics of its students and assesses their needs, experiences, and levels of satisfaction.”</p> <p>There is no mention of special student populations.</p>

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Malcolm Baldrige National Quality Award, provides an alternative evaluation process structured around quality improvement principles and a structured set of goal-setting, networking, and accountability activities. Characterizing itself as a “continuous performance improvement model,” AQIP is based on ten criteria and principles for high performance. Colleges identify and undertake three “action projects” for improvement through which they can examine new opportunities or address longstanding challenges. At least one of

these projects must relate to student learning—it can deal with learning assessment, educational program design and delivery of instruction, evaluation, transcribing, academic advising, or other academic processes that directly affect student learning.

When a college or university formally becomes a participant in AQIP, the date of its next reaffirmation of accreditation is set seven years from the official action admitting the organization to AQIP. An organization can elect to leave AQIP at any time to return to PEAQ. The Higher Learning Commission can move an institution back to PEAQ if the college’s demonstrated com-

The Western Association’s Commission on Senior Colleges and Universities Revamps its Accreditation Process and Support

From 1995 to 2000, with funding from the Pew Charitable Trusts and the James Irvine Foundation, the Western Association’s Commission on Senior Colleges and Universities undertook a major overhaul of its accreditation philosophy and standards. Although community colleges are outside the purview of this commission’s work, it deserves special mention for going further than most in rethinking the role and process of accreditation. At the heart of the transformation is a shift “from an organization perceived in the mid-1990s as largely regulatory and compliance-oriented to a capacity-building organization around issues related to student learning” (Western Association of Schools and Colleges 2006).

The commission undertook a comprehensive evaluation of its policies, procedures, and standards. Designed from the start as a collaborative process with institutions, the evaluation involved commissioners, representatives of member institutions, and the public. The result was a multi-stage model of accreditation and, in 2001, the publication of new standards of accreditation.

The new model addresses two core commitments: institutional capacity and educational effectiveness. The commission’s handbook includes four new standards that address institutional mission and assessment of effectiveness; student learning programs and services; human, physical, fiscal, and information resources; and governance. The new standards emphasize student learning outcomes as central measures of excellence and institutional improvement. Each standard comprises four interrelated elements: the standard, criteria for review, guidelines, and questions for institutional engagement.

The commission also redesigned the peer review visit. The new accreditation review process involves three stages: the institutional proposal; the preparatory review; and the educational effectiveness review. Stages 2 and 3 involve site visits to determine how an institution fulfills the core commitments to institutional capacity and educational effectiveness. The four new standards, especially Standards 2 and 4 on learning and governance, serve as a frame for selecting topics to be examined in the review. An institution can choose to base its review on an in-depth assessment of a limited number of topics, or it can follow an “audit-like” approach to examining key processes for assuring quality in teaching and learning.

The review cycle is a maximum of ten years. Institutions have three years to complete the process of self-review and external evaluation, followed by an extended period for sustaining initiatives and acting upon the review’s recommendations.

The commission has acknowledged that its new model challenges institutions and evaluators and requires a culture shift. To demonstrate its own accountability to the new model, the commission undertook an internal review, resulting in the adoption of a set of values to guide its own conduct in implementing the new standards and the conduct of evaluation teams and institutions going through the process.

To help colleges adapt to new guidelines, the commission requires pre-visit conference calls with the review team and provides worksheets for teams to use in those calls so there is greater consistency of approach across institutions. The commission also conducts workshops to help colleges identify appropriate learning outcomes and strengthen the reporting of outcomes.

mitment to the process is weak, and the institution is not making reasonable progress in improving performance.

AQIP has developed *Vital Focus*, a tool for institutional self assessment. This assessment package lets colleges situate themselves in relationship to the AQIP criteria, identify gaps in their performance, and undertake strategic planning. The package involves an online survey that all faculty and staff are asked to complete. During a subsequent campus visit by AQIP representatives, survey results are discussed, leading the college toward setting institutional improvement goals and specifying action projects.

The **Middle States Commission** has developed yet another approach. In 2002, it established fourteen new criteria, entitled *Characteristics of Excellence*: seven address institutional context and seven focus on educational effectiveness. The standards are clearly defined and illustrated, with examples of evidence that could substantiate an institution's achievement of the standards. While the commission has not instituted separate requirements or options for quality improvement plans, as the Southern Association and North Central have done, it offers institutions the choice of three major approaches to self-study: comprehensive, selected topics, and collaborative (Middle States Commission on Higher Education 2006). Institutions can choose a fully comprehensive self-study or one that is more narrowly focused. Each model can be organized by the commission's published standards for accreditation, by groups of standards, or thematically—in a way that is most useful to the institution for self-evaluation and improvement.

In each of these associations' institutional improvement models, it is up to the colleges to identify areas of improvement on which to focus efforts within broad guidelines set by the accrediting body. For the most part, the process relies on commonly accepted norms, determined and validated by the experience and judgment of accrediting teams, rather than specific guidelines from the accrediting body.

Interviews with evaluators and college officials indicate that the QEP and AQIP processes provide real opportunities—accompanied by many challenges—to focus an entire institution on what it takes to improve stu-

dent learning and student outcomes and to sustain that improvement over time. Their design and incentives can be an effective spur to reflection, planning for improvement, and data-driven monitoring of the effectiveness of change strategies.

Institutional improvement processes like QEP and AQIP help colleges move beyond a compliance perspective to a focus on improvement. Because they are linked to accreditation, on which a college's reputation and fiscal viability rest, these processes can become an "institutional glue" and provide a platform for leadership to build an institution-wide consensus around priorities, strategies, and resource allocations. Accreditation processes rooted in improvement plans can provide leadership with the opportunity and leverage needed to build new infrastructure or set up internal structures to address institutional weaknesses.

AQIP and QEP provide additional advantages for colleges that want to improve student outcomes.

Reporting cycles for institutional improvement plans are shorter and more frequent than the traditional decennial reporting structure in accreditation.⁴

Improvement processes also require considerable institutional energy and focus, which allow the work of accreditation to permeate deeper and wider.

Appropriate faculty and staff must be involved to "make it happen" if specified targets of action are to be designed well, implemented, and assessed effectively.

Several *Achieving the Dream* colleges that have been involved in accreditation have identified two distinct benefits from simultaneous involvement in AQIP or QEP. The processes have provided college leadership with a legitimate and urgent reason to focus institutional time and resources on improving student outcomes—and on making coherent and concerted change a priority across the college. In addition, the processes have given an extra boost to colleges' efforts as part of *Achieving the Dream* to use data and analysis to plan and act institution-wide to improve student outcomes, particularly for low-income and other traditionally underrepresented students. The synergies that resulted were of great value to the leadership and boosted efforts to focus the college and its faculty and staff on student success.

Using Accreditation to Focus on Improving Student Success: The Experience of Two Achieving the Dream Colleges

Several colleges participating in *Achieving the Dream* have undergone accreditation recently. At least two, Danville Community College in Virginia and Tallahassee Community College in Florida (both in the Southern Association of Colleges and Schools region), have explicitly aligned their *Achieving the Dream* efforts with their accreditation process.

In part because of timing, the community colleges have taken slightly different approaches to aligning accreditation with *Achieving the Dream* planning and implementation. At Danville, initial planning for *Achieving the Dream* priorities and activities coincided with the launch of the Quality Enhancement Plan process. As a result, the meetings and strategic planning related to *Achieving the Dream* helped shape the priorities and the focus of the QEP effort. In particular, the *Achieving the Dream* focus on improving retention and completion outcomes for low-income, minority, and other less well-prepared groups helped shape the topics the college chose for its QEP process and review. At Tallahassee, the QEP process was underway before the college joined *Achieving the Dream*. The decision to join *Achieving the Dream* provided additional resources to implement particular activities. *Achieving the Dream* enabled the college to sharpen its focus on the analysis of student outcome data for particular groups of students enrolled at the college.

The experiences of both colleges demonstrate the ways in which aligning two data-driven, institution-wide processes can reinforce each other. They show what a committed and creative leadership can do to seize the opportunities that present themselves to focus institutional attention and resources on issues of student success. Accreditation, particularly in regions where the process has moved toward greater emphasis on outcomes and improvement, can provide a useful lever for institutional leadership. As noted above, an institution can get accredited without putting student success at the heart of its priorities, plans, and assessment, but for institutions that want to move in that direction, accreditation can legitimize and add urgency to leadership change strategies.

Danville Community College

Danville Community College recently underwent its reaffirmation with the Southern Association. Danville has an annual headcount of 4,000 students. About a third of its students are minorities, primarily African Americans. Two-thirds of its students are enrolled part time, and about 40 percent are enrolled in occupational and technical training.

Danville's participation in *Achieving the Dream* and its reaffirmation with the Southern Association occurred concurrently. At the college's annual planning retreat in the year the process was launched, focus group feedback and data generated for both reaffirmation and *Achieving the Dream* led the leadership to identify four areas where institutional actions might enhance student learning and success. These four areas became the foundation of the Southern Association's mandated Quality Enhancement Plan aimed at improving student learning and success:

- *College success skills course*: The college determined that a first-year student success course was needed to address faculty concerns about student readiness for college and other student issues.
- *Enhanced assessment*: While all Virginia community college students who enroll in a program must take a placement test, the college decided that it needed enhanced assessment capabilities to better evaluate students' strengths and weaknesses and place them in the proper course level to improve their chances of success. Leadership also decided that more personalized counseling would aid students in identifying and reaching their academic, personal, and career goals.
- *Faculty and staff development*: The college decided to focus on staff and faculty development and to identify training needs and opportunities that might help overcome any instructional barriers to student engagement, such as variations in cultural competence.

- *Academic and student support*: The college wanted to expand and strengthen student support services to improve student learning and success.

According to Janet Laughlin, coordinator of the Student Success Center and Professor of Administrative Support Technology at the college, Danville's leadership created an internal structure that addressed the goals of *Achieving the Dream* and the Quality Enhancement Plan. The college Leadership Team responsible for overseeing the accreditation process also became responsible for overseeing the *Achieving the Dream* initiative. Four teams, chaired by faculty, were formed to develop the QEP. Each team was comprised of approximately fifteen faculty and staff members. With an *Achieving the Dream* planning grant underway, Danville recruited staff and faculty to join the teams that would focus research on minority and low-income students within the context of each of the four QEP areas. These recruits formed subcommittees within the QEP teams, and the objectives and strategies that emerged from their research and discussion with their QEP teammates were written into an *Achieving the Dream* implementation grant proposal.

The committees identified two priorities: improving the success of low-income students and students of color in developmental math; and improving semester-to-semester persistence. Research led to the conclusion that learning communities would be the best way to address the needs of less-prepared and less-advantaged students. In fall 2005, Danville implemented the new college success skills course, the central piece of the QEP, through four curricular learning communities. *Achieving the Dream* funds supported the development of the college success skills course. The courses connected through the learning communities were developmental math, college success skills, and a course in the student's major.

Within the learning communities, faculty collaborated on ways to better engage students in their learning and the life of the campus, reinforced course content across the three courses, emphasized ethical principles and academic integrity, and encouraged students to take advantage of free supplemental tutoring provided at times fitted to course schedules. Also provided to learn-

ing community students through *Achieving the Dream* funds were two additional assessment instruments: one to identify career interests (Strong Interest Inventory) and another to identify non-academic barriers to success (Noel-Levitz College Student Inventory). Students had to meet a counselor to discuss the results of using both instruments.

Danville's experience suggests that accreditation can be a very useful opportunity for defining and acting on an institution's desire to improve outcomes and narrow achievement gaps across different groups of students. However, Danville benefited greatly from the strong commitment of its leadership and from additional planning and resources. The *Achieving the Dream* planning grant gave both impetus and initial focus to a process of institution-wide commitment. Accreditation enabled the college leadership to make an even more concerted effort to engage the entire institution in a process of planning for improvement focused on student success. Accreditation did not drive the institutional attention to success or, particularly, to improved outcomes for minority and low-income students; rather, it provided an opportunity that leadership seized.

Tallahassee Community College

Tallahassee Community College, an urban community college located in Florida's state capital, has a credit enrollment of more than 14,000 students. TCC is the largest feeder institution to Florida State University, and it also has an excellent relationship with Florida A&M University and other Florida colleges. Nearly three-fourths of the college's Associate's degree graduates transfer into the state university system the following year, the highest percentage in the Florida Community College System. However, graduation rates for African-American and Hispanic students have lagged far behind those of their white peers. When selected to participate in *Achieving the Dream*, TCC set two primary goals: closing the achievement gap between African-American and white students; and moving more students beyond developmental and gateway courses toward successful transfer.

Like Danville, TCC's selection to participate in *Achieving the Dream* occurred concurrently with its scheduled participation in the Southern Association accreditation process. TCC was one of the first colleges tasked with using the adoption of a Quality Enhancement Plan as a key component of institutional improvement and renewal.

TCC President William Law saw the greater emphasis on student outcomes incorporated into Southern Association accreditation processes as an opportunity to put in place, generate momentum for, a new infrastructure for improvement. According to Law, the QEP provided an opportunity to go beyond the institutional checklist mentality and address "how to help students be successful." As Law notes, accreditation is typically seen as a high-stakes event, but he feels this is the wrong way to think of the process. There is very little chance that TCC (or most established institutions) would ever fail to be re-accredited. So, in Law's view, institutions should break out of the compliance mentality and think of ways to take advantage of the process, using it to advance the institution's priorities for change and improvement.

As with many community colleges, Tallahassee serves a more diverse student body now than it did in the past. Law wanted to use *Achieving the Dream* to sharpen the college's focus on student outcome data—a task that the college had already undertaken as part of its QEP. He wanted to find out what was happening with students in different programs, with different backgrounds, and from different population groups.

Tallahassee's leadership decided to define student success as "students finish what they start." The quality team determined that if students could complete a difficult gatekeeper course, they were much more likely to return the next semester and eventually graduate. That focus on *finishing* allowed every staff and faculty member to examine his or her role in making that happen. It became easier to engage faculty, staff, administrators, and trustees, a process that was an enormous task under the previous "accounting/checklist mentality."

The college has started work on a new, strategic, knowledge management system that seeks to inform decision making by students, faculty, staff, and administrators and strives to ensure student success by supporting decisions based on evidence rather than instinct. It is developing a "first-time-in-college" system to track student success and retention. Using the system, TCC is following the progress of students intending to pursue an Associate's degree. The college has also introduced a series of interventions to improve student outcomes and the effectiveness of programs and student support services. Today, TCC's first-time-in-college system supports the strategic alignment of student, course, and academic department goals, and it puts information on student performance and progress into the hands of decision makers in a timely manner.

College leaders and staff are convinced that, through the QEP and *Achieving the Dream* processes, TCC has gained the confidence to follow the trail, wherever the data leads. According to Law, "Getting better at describing and justifying why our students aren't successful is a waste of energy. An institution needs to change in order to help every student meet their goals." For Law and his institution, the confluence of accreditation and *Achieving the Dream* accelerated a data-driven approach to institutional improvement that was already a priority.



Looking Ahead: How Can Accreditation Become More Supportive of Better Student Outcomes?

The role of accreditation as a lever for higher education accountability has become controversial in recent years. Some critics take the accreditation bodies to task for providing colleges with too little direction on issues of quality and improvement. They argue that self-regulation through voluntary peer review may not suffice when the value-added of higher education programs and institutions is a critical public policy and private investment concern.

In response, regional accreditors have revised standards to give greater emphasis to student learning and student success. However, the specificity of these standards varies across the regional accrediting bodies, as does the traction they have in any given accreditation process. As noted, several regional agencies have added an institutional improvement planning component or option to accreditation process.

As a process that must be flexible enough to assess the quality and effectiveness of many different types of institutions, with varying missions, priorities, and programs, accreditation is not, on its own, a particularly powerful accountability mechanism. Standards are fairly broad and general, so that institutional autonomy and mission are respected. Prescribing acceptable outcome benchmarks is not part of the process.

Accreditation processes could certainly benefit from greater transparency and better communication of findings to relevant stakeholders. Other accountability mechanisms are needed—and states are a logical locus for more powerful accountability.

Even if accreditation may not be the tough external driver for institutional improvement that some might hope, creative and committed institutional leaders can use it effectively toward that end, particularly in regions where institutional improvement plans are an option or a requirement. The process provides an opening for greater focus on and institutionalization of change. And, according to college leaders and evaluators interviewed for this brief, the change in emphasis toward student learning, student outcomes, and continuous improvement processes is having an effect.

In July 2006, Jobs for the Future and the American Association of Community Colleges convened a meeting of CEOs of regional accreditation agencies and several leaders of of *Achieving the Dream* colleges. The participants identified specific opportunities for, and challenges to, the use of accreditation to drive greater attention to student outcomes and improvement in those outcomes. Summarized below, they fall into five categories:

- Student outcome standards and definitions;
- Standards and criteria related to special populations and their needs;
- Student learning versus student progress and success;
- Institutional research capacity; and
- The self-study process and training related to it.

At the conclusion of the July convening, the participants agreed to pursue opportunities to benefit from further exchanges of ideas, lessons, tools, and materials. Jobs for the Future and the American Association of Community Colleges will keep this dialogue going in the coming year.

Student Outcome Standards and Definitions

All higher education accreditation bodies now have standards around student outcomes, but the standards remain broad and generic. They vary considerably in their specifications and how they are applied by different visiting teams. While the materials and guides of all regional accrediting agencies specify that direct measures of student learning outcomes are required, there is minimal guidance on what appropriate measures might be. Some of the commissions go further than others in providing examples of what constitutes good evidence of particular student outcomes. By and large, though, the commissions expect colleges to determine appropriate outcomes for themselves and to assess performance accordingly (Dale 2004).

The Middle States Commission provides an instructive example. Middle States offers more detailed specifications on standards than do many accrediting agencies, and each standard is followed by “fundamental elements” that explain and elaborate upon the standards. For each standard, there are sample questions for self-study. In a handbook, the agency lays out the details for student learning assessment at the course, program, and institutional levels, and it has compiled an extensive Web-based library of institutional examples of the use of student outcomes assessment. However, the commission gives institutions wide latitude in how they approach the self-study requirement for accreditation—they can choose between a comprehensive and a topical approach—and in how they define and set goals for student outcomes. Moreover, the standards are very broad. Under “Assessment of Student Learning,” for instance, the handbook explains that “[a]ssessment of student learning [should] demonstrate that the institution’s students have knowledge, skills and competencies, consistent with institutional goals and that students at graduation have achieved appropriate higher education goals.”

Are such definitions and standards sufficient?

According to interviews for this brief, the specification of standards around student learning outcomes has become one of the most difficult challenges for accreditors as they seek to help colleges become more outcome-oriented. It has also spurred some frustration among institutions trying to specify outcomes—particularly learning outcomes—that meet accreditors’ standards. A growing number of institutions are finding, as they go through their first accreditation under new standards, that they are expected to specify outcome measures, but they get little guidance on what those might be or how they should be constructed and presented. One interviewee, who has been an active accreditation reviewer, reports a significant increase in the number of institutions coming to her for assistance on outcome measures—either after they have been “marked up” for not meeting outcome-related standards or because they fear they don’t know how best to select, track, and act upon the implications of student learning and outcome measures in their accreditation efforts.

Because many colleges are using the revised standards for the first time, they are getting “marked up” due to their inability to meet the new accreditation requirements. The problem of outcomes that are overly broad and poorly defined has been noted by other observers of accreditation. Peter Ewell (2001) has pointed out the need for accreditors to be clear about terminology when considering evidence of student learning outcomes. He also pointed to the need for “accreditors to develop a common vocabulary around their requirements.” Others have noted that this is not the first time that higher education accountability entities have failed to look at commonly accepted methods for measuring student learning. In fact, the lack of such standards in state accountability systems was a key point of the Measuring Up reports.⁵

Under current patterns of accreditation, the experience and training of evaluators is the primary source for validating the appropriateness of the outcomes and integrity of an institution’s goal-setting efforts. Can the commissions go further in clarifying outcomes for institutions or specifying outcomes to include in self-study and reaffirmation plans? Do existing variations in standards and their relative specificity appear to make any difference in the way institutions respond? How can accrediting commissions work together to set a balance between flexibility and prescription that provides more guidance and direction on issues of student learning and outcomes?

Standards and Criteria Related to Special Populations and Their Needs

For *Achieving the Dream*, tackling achievement gaps and improving the success of low-income students and students of color are central priorities. This goal is not explicit in accreditation standards and criteria, except in the broadest of terms. The Middle States Commission suggests that parity across student populations be a consideration in a college’s student outcome goals. The New England Association of Schools and Colleges, in its *Handbook of Accreditation*, suggests that if an institution chooses to recruit and admit specific populations, including remedial students, it must provide support for the success of these populations and will be assessed separately on their success. However, NEASC

does not prescribe how the institution should go about doing this or what acceptable outcomes might be. The North Central Association's approach is indirect, requiring a college to demonstrate its attention to diversity by documenting how well it engages and serves communities in its service area. Because many community colleges serve areas with heavy concentrations of low-income or minority populations, this standard of assessment, instituted recently, has become a potential lever for colleges to focus on improving services for those populations. The Western Association of Colleges and Schools states: "The institution should identify and seek to meet the varied educational needs of its students through programs consistent with their educational preparation and the diversity, demographics, and economy of its communities. The institution relies upon research and analysis to identify student learning needs and to assess progress toward achieving stated learning outcomes."⁶

In the past, accreditors found it problematic to specify standards or expectations on diversity in access to higher education institutions. Participants in the July 2006 meeting convened by JFF and the AACC said they are far more comfortable with standards that give priority to equitable performance (rather than access), i.e., equitable outcomes across different student demographic subgroups.

The diffused focus on low-income and minority populations in accreditation requirements poses a challenge. Without such a lens, an institution has no special incentive to dedicate resources and energy to these populations or focus on them for the purposes of accreditation, even though they comprise a significant and growing body of students in the nation's community colleges—and are among those students who have the most difficult time succeeding in college. Should accreditation be more explicit about narrowing achievement gaps as a priority for institutional performance and quality? If so, what would such a priority look like in standards and in the accreditation process?

Student Learning Versus Student Progress and Success

The emphasis on student outcomes in new accreditation criteria tends to focus on student learning. Accrediting bodies should be congratulated on their focus on learning; accountability discussions about higher education are only beginning to tackle this challenging and critical issue, and the accrediting bodies are out front in their emphasis on learning and its measurement. Other improvement efforts, including *Achieving the Dream*, address student progress toward completion, rather than learning itself. For institutions trying to put the two processes together, this can make their alignment more difficult. Learning and completion are two sides of the same coin, but they differ in emphases and strategies. While student learning is certainly the primary outcome for an educational institution, success measures such as retention and completion push colleges to grapple with the conditions beyond classroom interactions that can affect learning, such as financial aid, counseling, support services, articulation, and alignment with other education sectors. A question requiring more discussion and research is the balance that should be struck between outcome measures that focus on student progress and completion and those that related to student learning.

Institutional Research Capacity

To a large extent, accreditation is based upon, and dependent on, an institution's capacity for self-assessment, even as it seeks to strengthen that capacity. Most colleges will require additional capacity to implement effectively the regional bodies' expanded focus on outcomes, institutional effectiveness, and improvement. Such capacity is not evenly distributed across institutions. The power of accreditation as a data-driven process for institutional improvement can be undercut by a lack of research capacity or an unfamiliarity with what is required to use data for improvement and decision making.

Accrediting agencies acknowledge this constraint. The Middle States Commission notes that, in order to meet its revised standards, institutions must commit increased resources to research and analysis, particularly related to the assessment and improvement of

teaching and learning. When the Southern Association revised its accreditation criteria to call for a greater focus on institutional effectiveness—even before it introduced the QEP—North Carolina introduced state funding for institutional effectiveness personnel at its community colleges, recognizing the disparities in capacity across its colleges.⁷

This issue looms large: institutional research capacity is critical to continuous improvement strategies. Further, colleges also vary in their ability to perform other functions necessary for institutional effectiveness, such as program evaluation, strategic planning, and budgeting. Is there a role for regional accreditation agencies in stimulating resource reallocation for research capacity and other institutional effectiveness functions? Can states, or even the accreditation agencies, do more to promote institutional assessment capacity through training? Interviewees emphasized the need to find ways to support the institutional research *function* rather than the IR *office*. At least one accrediting agency ran into problems a number of years ago when its standards around institutional research led institutions to staff an IR office without any clear indication of what functions a new or expanded office should play.

The Self-Study Process and Training Related to It

The accreditation process relies heavily on accepted norms in higher education—for example, the number of credits required to complete a course or confer a degree. The evaluation of institutional performance is highly contingent on the experience of the evaluators and their interpretation of an accreditor’s standards and data. Although supporters argue that peer review assures a certain level of knowledge and expertise, it might be possible to improve the training of evaluators to mitigate subjective influences, assure more consistency in evaluation, and help attune evaluators to student success and outcomes and how they are addressed in institutional plans.

The U.S. Department of Education requires accreditors to have effective controls against the inconsistent application of standards. Every accrediting agency must have competent and knowledgeable individuals, quali-

fied by education and experience in their own right and trained by the agency on its standards, policies, and procedures, to conduct its on-site evaluations, establish its policies, and make its accrediting and pre-accrediting decisions (U.S. Department of Education n.d.).

Some commissions (e.g., the Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges) are further along than others in developing better systems and materials for evaluator training, and in using evidence rubrics in team training and deployment, but mechanisms to increase consistency in evaluator training across the regions are weak or non-existent. The Council of Regional Accrediting Commissions has identified general principles of good practices in accreditation, but they do not extend to a discussion of evaluator team composition and training. More consistency and rigor in training could be a way to accelerate and deepen attention to student outcomes in the accreditation process and in improvement processes guided by review reports (Ewell 1998). Interviewees from *Achieving the Dream* colleges noted the need for review team training and support that might cover specialized skills, from finance to data to learning outcomes definition and measurement.



Conclusion

A variety of stakeholders in higher education are placing growing demands for greater accountability by colleges, posing new and significant challenges to accreditors and the peer assessment model. This challenge is especially difficult to meet because accreditors are not direct regulators of educational quality or institutional performance, yet they must respond to such demands.

The prevailing system of accreditation, marked by a considerable degree of autonomy and independence for both institutions and accreditors, may not longer be sufficient—either for colleges or accreditors.

There is a growing sense, among institutions and accrediting bodies alike, that accreditation would benefit from moving toward an ongoing process of continuous improvement based on a culture of evidence, built around the central themes of student learning and student success. This shift from a periodic, discontinuous seminal event will require a parallel shift from a compliance framework to an improvement framework, with data driving the undertaking. And it will require assistance and support from the accrediting bodies so that institutions can develop the capacity to make this shift. In effect, they will need to change what they can provide to, and expect from, their institutions and to work together toward that end with their colleges and with each other.

For accreditors and their institutions, perhaps the biggest challenge involves finding the balance between guidance and prescription. As the CEO of one accrediting body put it, “Colleges like to know what they need to do, but they don’t want to be told what to do.” All accreditors have introduced standards to get institutions to focus on student outcomes as part of their accreditation requirements, but they are discovering that institutions need help in navigating this new territory. Institutional expertise around evaluation and measurement is an issue, as is institutional research

capacity that can help colleges do this, but more important for colleges is to know what to measure. This will require collaboration between accreditors and their colleges and their faculty members to arrive at a consensus on some common, acceptable measures of student learning and student success.

Continuous improvement requires ongoing dialogue between accreditors and institutions, a conversation that is very different from a model of high-stakes, periodic interactions. North Central and the Southern Association have moved in this direction through the introduction of their quality improvement plans, while some other accreditors have introduced elements of ongoing dialogue in their accreditation procedures. The trend in this direction is likely to continue.

In this period of change, rising expectations, and a demand for greater accountability and transparency in higher education, the role of accreditation and of accreditation agencies is being looked at anew. If the experience of *Achieving the Dream* institutions is any indication, accreditation can be a powerful tool in efforts to improve student outcomes. Moreover, greater ongoing collaboration, sharing, and learning between accreditors and their institutions and across institutions trying to improve student outcomes can benefit all parties. The appetite among regional accreditors to revisit their policies and practices and to continue trends that have been set in motion in recent years is encouraging.

Achieving the Dream will continue the dialogue begun this year, and it will identify specific activities and projects that can unite accreditors and *Achieving the Dream* colleges in pursuit of strategies to improve student outcomes and increase student success at member institutions. The progress of these efforts will be reported in future *Achieving the Dream* publications.

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Notes

- ¹ Accreditation is not the only means of assuring educational quality in the United States. States exert varying degrees of control over their institutions of higher education, and they often have separate and parallel requirements for institutional accountability. Public colleges and universities are reviewed by state governments to qualify for state funding. Institutions also hold internal program reviews that serve as internal quality checks. In some cases, licensing agencies may also review programs and institutions (see Werner 2004). The media has also played a role in increasing awareness about variations in educational quality: an example is the *US News & World Report* annual ranking. However, this kind of benchmarking targets selective colleges and universities and is irrelevant to assessing community college quality.
- ² The perspectives and experiences of both institutions, which are accredited by the Southern Association of Colleges and Schools, are fairly representative of those in the broader community college world.
- ³ The Pew Charitable Trusts also made substantial investments in the Western Association's Commission for Senior Colleges and Universities, with the objective of moving accreditation towards outcomes. This agency—which works with four-year institutions but not community colleges—has been on the front line in the move toward an outcomes-oriented, continuous improvement model.
- ⁴ The newer reporting cycles are not limited to institutional improvement plans; some of the other accrediting bodies have introduced shorter cycles and interim reporting in their accreditation requirements as well.
- ⁵ Measuring Up is a series of biennial, state-by-state report cards for higher education from the National Center for Public Policy and Higher Education. This report grades states on their performance in five categories: preparation, participation, affordability, completion, and benefits.
- ⁶ Some agencies have dealt with the issue of educational preparation quite specifically. The New England Association maintains that: “If the institution recruits and admits individuals with identified needs that must be addressed to assure their likely academic success, it applies appropriate mechanisms to address those needs so as to provide reasonable opportunities for that success. Further, the association requires that “the institution utilize appropriate methods of evaluation to identify deficiencies and offer appropriate developmental or remedial support where necessary to prepare students for collegiate study.” Under Standard 13, Related Educational Activities, the Middle States Commission addresses programs or activities that are characterized by particular content, focus, location, mode of delivery, or sponsorship. This includes basic skills or developmental courses. For this standard, the commission needs to know: “How does the institution systematically identify students who are not fully prepared for college-level study? For admitted underprepared students, is there institutional provision of or referral to relevant courses and support services?”
- ⁷ In 1989, following the introduction of institutional effectiveness criteria in the Southern Association's accreditation requirements, North Carolina introduced institutional effectiveness plans into its own accountability criteria. Through Senate Bill 80, the state funded one staff position for institutional effectiveness in every community college from its general fund. Many colleges used this funding to build their institutional research capacity.



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