APPENDIX A – MEETING TRANSCRIPT OF THE CHALLENGES AND PERSPECTIVES ON QUALITY IN HIGHER EDUCATION PANEL

MR. EWELL: Okay. That's wasn't clear, but that's fine. I'm Peter Ewell from the National Center for Higher Education Management Systems, Vice President. I'm very happy to be here. Thank you for the invitation.

It seems like I've been thinking about and talking about this particular topic for the last 30 years, and it's something that I've written about a good deal. The particular accreditation connection goes back all the way to writing for COPA, which some of you may remember back in the mid-80's, in pieces about student learning and accreditation.

But I think the most relevant pieces that you might want to consult are a piece that I did for CHEA just two years ago Judith, something like that.

MS. EATON: Yes.

MR. EWELL: Called "U.S. Accreditation and the Future of Quality Assurance," the 10th anniversary monograph. I learned a great deal about the history of accreditation at that point, and I

think uncovered a couple of dilemmas that have been with us at least since -- I was talking to Art about this, 1994.

In the 1992 Reauthorization, we raised a number of these issues at that time, and they're still out there. I wrote about this with Jane Wellman as well, in a piece called "Refashioning Accountability" in 1997, which was really in the wake of the 1992 amendments and the kinds of issues that were put there.

All those issues are still on the table, and I'm going to try to at least outline a couple of them in the few minutes that I have. As a member of the opening panel, I was asked particularly to frame the evolution of the role of accreditation and quality assurance historically, and then take a look at its current condition.

Institutional accreditation has been around for a very long time, 100 years at least. You'll hear from Barbara Brittingham from the New England Association, which was founded in 1885. The newest one is the Western Association, which goes

back to 1924.

And the framing question for these associations was what is a college? How do we distinguish a college from high school, from a different kind of provider, whatever it may be? It's kind of interesting, delving into this for the monograph.

One of the framing events was that Germany wanted to know whether or not the folks that were coming over to teach at German universities were respectable, and they asked the U.S. government what's a university? What's an institution that we can trust? That was the first time that that question really had been raised, and that in many ways framed the development of these organizations.

But in the early years, accreditation functioned as much as associations as they were as quality assurance kinds of organizations. They had conferences about curriculum, they had conferences about pedagogy, what should be taught, what's a legitimate subject, all of that kind of thing.

Only a very small piece of what they were

doing was reviewing institutions and determining whether they were sort of worthy to sit in the ranks of being a university. They also were really small. Belle Wheelan's going to talk to you from the Southern Association. Her organization had 12 institutions as its original founding body. It had risen to 40 by 1915. So, you know, it got started really, really in a small way, and gradually included more and more institutions of different kinds.

The normal schools, which were the institutions that taught teachers back when they were called that, were not included in accreditation originally. None of the technical institutions were. And so throughout the century, you got gradually wider inclusion of institutions that were looked at.

There wasn't much inspection going on. At most, a half a day visit one time and you were in. There was no periodic reevaluation and all that, and it wasn't really until about the 1950's that you had the accreditation that we now know, which is founded on a mission-centered review, and I think that that's very important in all of our deliberations to

recognize, is that accreditation was always designed around the notion that you took a look at an institution's mission, and you looked at the performance of that institution, according to that mission, not according to a set of completely standard standards, that you really were looking at that in relation to what it said it was trying to do.

Self-study, that became regularized very, very early, and self-study is probably, and certainly Judith, your Presidents Project and many of the pieces of research that we've dealt with, that's the thing that presidents seem to value the most about all of this, is that you learn so much about yourself in the course of self-study, and it's really a very good thing to have somebody make you do that, because you don't necessarily want to sit down and do that on your own.

Peer review. Peer review, essentially on the assumption that any kind of set of chosen individuals from the academic community ought to be able to recognize quality when they see it, and can therefore go and visit an institution and determine

whether it's there.

I think the emphasis on institutional improvement really has been the hallmark of the classic accreditation paradigm. It really is not about --

CHAIRMAN STAPLES: We've reached our five minutes, and I hate to cut you off. Could you try to wrap up?

MR. EWELL: I will. I'm sorry. Why don't I cut to the chase in terms of the current condition of accreditation. Accreditation was never design to do that job that it's now being asked to do by the federal government. That was the point in the long historical exegesis, is that it really was put in place to do something quite different.

And the drawbacks of accreditors as enforcers, as essentially doing a federal job, have been periodically pointed out over the years, and they came out very, very early. Most of them center on a couple of common themes, where a lot of observers, including myself, believe that substantial improvements can be made, without impairing

accreditation's significant quality improvement role, and without imposing a government or a federal solution.

I think that it's important to recognize that, at least in my view, is not going to work.

Four areas for consideration, very quickly: Need for rationalization and alignment of standards across accreditors. Accreditors speak in very different voices at the moment, although they do very different, very much the same thing.

A need for greater consistency in the quality judgments produced by peer review. Peer review assumes that the peers really know what they're doing, and in many cases they do, but things have gotten much more complex, particularly in the role of assessment of student learning outcomes, and the current approach varies a lot from team to team, and teams don't get a whole lot of training.

I've done a lot of work internationally and have taken a look at what other quality assurance systems internationally do, and our teams don't get much training compared to others.

The need to address, I think, all or nothing quality of accreditation decisions. The accreditation decision is up or down, and that means that an accreditor is often reluctant to sanction institutions because it can be for some of them a death sentence, and the possibility has been raised from time to time and I think it's worth considering, of having different levels of accreditation that would modulate that event.

And the need for greatly improved transparency with respect for the outcomes of accreditation, in terms of how you get a decision essentially out to the public, and requiring institutions to prominently display evidence about student learning.

All of these are areas, I think, where progress is possible, and the accreditors and the Department can work together. I want to make a plea at the end that our non-governmental distributed system of quality assurance based on the triad and accreditation is the envy of the world in a lot of ways. A lot of countries would like to be where we

are.

And I think it needs a thorough review and overhaul, leading up to the next reauthorization. But I don't think that the system needs to be chucked out entirely.

CHAIRMAN STAPLES: Thank you very much, and we'll have an opportunity for questions, I'm sure, after the remarks are finished. Dr. Eaton, I'd love to hear from you.

DR. EATON: Thank you, Mr. Chairman, and good morning committee members and colleagues. I am Judith Eaton, the President of the Council for Higher Education Accreditation. We're an institutional membership organization, non-government, with a charge to provide national coordination of non-governmental accreditation.

I am pleased to be here to talk with you this morning about the future of accreditation and about the role of accreditation in our society. CHEA has been addressing this vital issue for the past two and a half years, in an effort that we call the CHEA Initiative.

We started in 2008 and launched what I believe is an unprecedented national dialogue about the future of accreditation and its serving society.

Many of the issues that are raised in the Policy Forum document are raised in the CHEA Initiative as well, and several weeks ago we sent each committee members all the summaries we have of the CHEA Initiative, everything we've learned in summary form from the 33 meetings that we have held since 2008.

We thought that might be of some value to you as you undertake this very important task, and all of this information is available publicly. It's on our website.

In what remains of my five minutes, I'd like to make five points, offering hopefully some thoughts about how to frame our discussion going forward about accreditation. My first point is that our shared commitment, institutions, accreditors, government, sometimes get lost.

We all want quality in higher education. We all acknowledge the importance of higher education

to our society. But then we have a number of differences with regard to honor this commitment, how to realize this commitment.

My second point is about accountability. In my view accountability is at the heart of this discussion about the future of accreditation, and in my view it's vital that accountability be additionally addressed. There is a crucial federal interest here. It's not only money, but it's the credibility of our higher education enterprise nationally and internationally.

There's a need for even greater attention to accountability from accreditation itself. Dr. Ochoa spoke at the CHEA annual conference last week, and he used a phrase that caught my attention. He talked about accreditation adding new virtues, which I found extremely helpful.

My third point is that we need to remind ourselves of the value of the fundamental principles on which accreditation is built, and Peter has already spoken to these. Accreditation has a history of significant success. Yes, it has its limitations

and you will hear about those limitations, I am sure, throughout the course of today and tomorrow.

But we are built on fundamental principles that have engendered success, responsible institutional independence, and driven by mission, academic leadership from institutions and faculty, not other sources; peer review, professionals judging professionals; and academic freedom, and that's familiar to all of us.

However, all too often in the current accountability discussion, we don't hear anything about the value of accreditation, nor do we hear an acknowledgment of the value of these fundamental principles.

My fourth point is about caution. Whatever we do going forward, let's not overstep. Let's not encourage compliance at the price of collegiality in accreditation. Collegiality is the bedrock of peer review. Let's not honor regulation at the price of quality improvement. Peter already spoke to the value of that undertaking.

I worry that we are overstepping in the

federal government accreditation relationship, when the federal government dictates accreditation standards and practice, telling accreditors how they must do their work versus holding accreditors accountable. And again, we must be accountable. The issue is how do we go about doing this.

I worry when the federal government second-guesses the judgment of accreditors about individual institutions or programs, and I worry frankly that the basic building block of any academic program moving in -- the credit hour moving into federal regulation, and what issues that raises about the capacity for academic leadership from our institutions.

So my fifth point is that there is a middle ground. We can have greater accountability and sustained fundamental principles of accreditation. Let me sketch out several points I think that would help us get there.

Government accreditors and institutions, for example, could agree to address accountability by a primary focus on institutional performance.

Evidence of --

CHAIRMAN STAPLES: We're at the end of our five minutes, so if you could please.

DR. EATON: I will. Thank you, Mr. Chairman. I was saying that we could agree on what the object is of our accountability, and I'm suggesting here institutional performance, evidence of institutional results, and success with students. We could develop a range of acceptable indicators for successful performance, whether it's students completing their educational goals or degree completion, or other indicators.

These indicators must be driven by mission, and it would be up to the institution to identify their indicators, provide evidence of their results, judge their results, make their results public and use their results to improve. Accreditors hold institutions accountable; government holds accreditors accountable.

If we could agree on the focus of our accountability efforts, and acknowledge these fundamental principles, we'll have honored our shared

commitment and diminished our disagreement about how to achieve it. We will have achieved greater accountability. We will have maintained, as I indicated, the principles, which was my third point, and my fourth point, we will have avoided overstepping.

I hope that as we move along with these deliberations and discussions, that we can find a path that enables us to realize these benefits. Thank you very much for your attention.

CHAIRMAN STAPLES: I thank you very much. Dr. Ochoa, thank you very much for being here, and we look forward to hearing your remarks.

DR. OCHOA: Thank you. Thank you, Chairman Staples. I'm Eduardo Ochoa, Assistant Secretary for Postsecondary Education in the Department of Education, and I thank you for the opportunity to address you.

I will be looking for the advice so I'm hardly in a position to give you advice on what advice to give me. So I'm not going to do that.

(Laugher.)

DR. OCHOA: But I did want to point out a couple of things, just for context. We really have been experiencing, in recent years, a very significant shift from state support of public higher education to federal support.

This has been happening as states have been reducing their subsidy to operating costs of public universities. Many of them then have responded by raising their tuition levels to be able to cover their costs, and the federal government has stepped in to increase support through Pell grants and financial aid and student loans to students.

So in effect, there has been that shift in terms of the support for the costs of public higher education. In particular public higher education I'm mentioning, because it is, at the end of the day, they produce well over 70 percent of the graduates, of college graduates in the country.

So this obviously means that the federal government has a great interest in ensuring that these taxpayer dollars are well-spent, and we're currently supporting higher education through this

mechanism of financial aid to the tune of, in the neighborhood of about $150 billion a year. So it's a significant amount of money.

There are basically two areas of concern. One is assuring the fiscal integrity of the institutions, so that the money is actually handled properly, and the other one is quality assurance. This is consistent with regulatory practice in the American economy, where whenever you have a product that is difficult for consumers to assess directly, there is some sort of mechanism by government to assure that quality, minimum quality levels are there.

And of course historically we have relied on accrediting agencies to carry out this role of quality assurance. This has become much more significant as the stakes have risen and, you know, it's been pointed out sometimes that there may be somewhat of a divergence or less than full overlap between the role of accreditors as supporters of institutions, in terms of continuous improvement, quality improvement, more of a formative assessment,

rather than more of the quality assurance or gatekeeper role, as it's been put.

So the questions that we're interested in hearing from the Commission and from the distinguished individuals that are going to be advising you is is our current structure, accrediting structure working? Is it doing -- can it handle the job that we face now, given the increased federal role in supporting higher education, or are there some changes that are advisable?

I think that we've heard already some recommendations from Peter and Judith, that you know, you will be taking into account, and we'll hear from others. So I'm very interested to see how you sort through this, parse through all this advice, and give us some recommendations, because we do have a, you know, I do believe we have the best higher education system in the world.

But the world is not standing still. So we have to continue to work to improve it, and our accreditation structure is one key piece that needs to be looked at with this notion of continuous

improvement that we're applying to the whole sector. So thank you.

CHAIRMAN STAPLES: Thank you very much. I really appreciate your remarks and will certainly take those words to heart. I'd like to see if the Committee has any comments. Yes.

COMMITTEE MEMBER ROTHKOPF: Yes. I want to thank the three panelists for really a very important start to this conversation. Let me say that my own background includes a college presidency, and I have to say that I was a board member of CHEA and in fact its board chair for a few years. So I have a perspective on what Judith has been saying.

I guess as I reflect on this issue, it seems to me we're asking the accreditors to do far more than they ever anticipated. They do, and based on my own experience with a regional accreditor, that they do a great job of helping institutions improve themselves, and I think the institutions recognize and are appreciative of that.

But now, as Dr. Ochoa indicates, there's $150 billion of money that's going out. In a way,

it's outsourced to these accreditors. They're the ones who once the Secretary, you know, recognizes an agency, then it's up -- then the accreditors are basically opening the gates to a huge amount of money, and even in Washington, $150 billion is meaningful.

I'm not sure that the system, and I don't have a solution, but I think there is a real dysfunction here between what the accreditors are doing and have been doing traditionally, and what we're asking them to do.

I guess I'd ask, I thought Peter Ewell's four suggestions were very interesting and start move in the right direction of maybe gradations of accreditations, far more transparency. I think the current system, where accreditation is often a black box to consumers, should not be permitted to continue, and a much better alignment of outcomes and standards.

I guess I'd ask, you know, do you all think that this system is feasible as that $150 billion continues to grow, and as the President wants

more people to go to school, quite rightly, there's a growth in many sectors here. Is this a viable system going forward for the next five or ten years?

DR. EWELL: I think that it can be aligned and fixed, rather than fundamentally disestablished. But it's going to take a lot to do it. I mean one, transparency is wonderful if you have, if you're singing off the same hymnal, and I think that one of the real difficulties that accreditors have at the moment is that the public doesn't see them as singing off the same hymnal. They look different from one another.

I mean take everything from the point of Arizona, it's in the North Central Region. I mean are you kidding? It doesn't really add up. I think that the fixes can be made, but it's going to be the accreditors and their constituents or the institutions that are going to have to do the fixing.

I think that, you know, weren't you around in '94, when the National Policy Board and the creation of CHEA, we were talking about exactly the same issues. I thought actually we were very close

to having a solution then. But the crisis went away we all essentially went on with business as usual.

So I think the fixes are there, but the community's going to have to do it. I don't think the federal government is going to be able to tell them to do it, because I think that that's not a solution that will fly.

DR. EATON: Art, I think it depends on how we do it. If the goal is standardization, I think that's extremely difficult across accreditation as we know it, and in many instances undesirable, and I would question whether it is workable.

We talk about there has to be common understanding for the community. I don't know what's so hard about saying we have a social institution here. It's an institution, higher education institution. We expect it to achieve certain results, and I'm going to obtain my information and make my judgment on what I know about the institution.

I can look at a lot of different institutions and make some comparisons. Will those

comparisons be perfect? No. But then you've got Princeton Review and U.S. News. You've got lots of different ranking systems that come out with different results, looking at similar entities.

So if we mean everybody's got to dance to the same tune, do exactly the same things and is measured by the same things, I don't think that's going to help anybody. I don't think it's going to help higher education, I don't think it's going to help the federal government, and I don't think it's going to help accreditation.

That's why I think it's important to figure out what do we want when we're looking at accreditation now.

Second, yes, accreditation is built on trust, and accreditation is built on an investment on the part of an institution or program that it wants to make things better. That's somewhat different from threshold quality determinations, and if in the view of all of us, and we've not discussed this very much, threshold quality needs a new look.

Initial accreditation, whether you have

access to federal funds at all, as higher education continues to grow, a new look for new institutions, emerging institutions. Then I think we need to figure out how to do that. But it doesn't make sense to focus on threshold quality for all institutions, many of which are quite mature, have a demonstrated track record of significant results, high quality performance.

Let's get clear on the accountability discussion, and I don't think standardization is the way to go there. Second, if we're really worried about institutions we believe are questionable for a variety of different reasons, and that's not code for type of institution at all, let's talk through how we address that. But again, not at the price of the benefits of the current system.

COMMITTEE MEMBER ROTHKOPF: Thank you. I appreciate it.

CHAIRMAN STAPLES: Other members of the Committee have questions? Anne?

COMMITTEE MEMBER NEAL: I want to pursue a little bit of the history that Peter, you put out so

nicely. As we look back at it, we have the two prongs, the quality assurance and the quality improvement.

As I understand it, the initial accrediting bodies were voluntary, so that they were very much used to doing quality improvement. And as I listen to all of you, there seems to be a continuing tension between those two roles, as the accreditors attempt to be both assurance for the public and quality improvements for the institutions themselves.

I'm wondering if that tension can actually be accommodated in any effective way, and I ask you, looking at that history and also looking at the statute, where is there in the statute an expectation that accreditors would be engaged in collegial quality improvement?

DR. EWELL: Well, it's probably not in the statute, because the statute was not intended to do that. I mean the history is one that accreditation was deputized. I mean that's a term that I've used quite deliberately, that it was around. It was the

only thing here.

The federal government gets a bargain out of accreditation. I mean they get essentially a quality assurance system with all its flaws for free. I mean there may be some difficulties associated with it, and I think it's important to recognize some of the things that really have been accomplished, particularly over the last 10 years, 15 years, by accreditation.

One is the focus on student learning outcomes. I think that actually, although the Spellings Commission had a lot of wonderful things to say about the problems in American higher education, it gave accreditation a bad rap with regard to that. Accreditation really has been responsible.

An organization that I'm associated with did a survey last year, that the primary reason why institutions are engaged in student learning outcomes assessment is because the accreditors are asking them to do it. That's no small thing, and I think that needs to be put there.

But going back to your historical point, I

think that they are kind of incompatible things, but I think they can be accommodated, and they can be accommodated largely by separation.

I think that some of the cleverer of the accreditors, and I won't name names at this point, have separated the function, as Judith was suggesting, of the initial accountability for minimum standards, and the continuous improvement.

Those two are antithetical to one another. Once you get them in the same process, accountability wins, compliance wins, and it sucks all the air out of the room. So what you have to do is create processes where you can separate the two functions in as visible a manner as possible, so that they can be accommodated.

But you're right in pointing out there is a fundamental contradiction here, which makes it difficult.

DR. EATON: I think it's important to remind ourselves that accreditation predates the public-private partnership of the recognition, of the recognition function, of the federal government

relying on accreditation as an authority on academic quality.

Second, to remind ourselves to go all the way back to the beginning of this relationship, 60 years ago, the Office of Education or whatever the relevant federal agency, had six conditions, six conditions for relying on accreditors.

There were things like you've been in operation several years; you were sustainable; you had adequate fiscal resources to do the job; you had a set of standards, all right. That was one page.

Compare that to where we are right now, with multiple pages in law, and ten times the multiple pages in law in regulation and in sub regulation. That in a way is reflective of the growing importance of higher education, the growth of higher education period, and thus the growth of accreditation.

But Anne, I'm beginning to wonder whether it's time to frame the issue differently, than saying quality assurance and quality improvement.

I've been talking to myself about this,

and that's why I said earlier, what do we want to know about colleges and universities, all right? How could accreditation help us answer those questions? How can other sources help us answer those questions?

The federal interest includes federal inquiry into a good deal of what higher education institutions do, as does state law, especially for public institutions. What do we want to know and what's the best source to get the information?

That to me is a better way, if I may, to come at this than to stay within the language that is so familiar to us, again at least this is what I've been telling myself, quality assurance and quality improvement. Because I think we would all agree that there is some tension there, no matter how much we do to make those two functions coexist.

COMMITTEE MEMBER KEISER: Thank you. Great panel, great discussion. In today's Inside Higher Education they talk about the fact that one of the major worries of the American public is the cost of higher education, and my son, who is a junior at a local institution here, it is very expensive and

we're pricing, it seems to be higher education, especially at the independent sector, pricing itself out of the ability of the American public to pay.

How much does accreditation play in that role, in driving up the costs, and how can we balance that accountability requirement, quality assurance, institutional improvement, without pushing institutions into elaborate systems and mechanisms that in many cases are there to create comfort for accreditors rather than for the benefit of the students?

DR. OCHOA: I'd like to take a crack at that question, not as the Assistant Secretary, but as a former provost, who actually had to undergo reaccreditation, both institutional reaccreditation for a campus and earlier as a dean of business, accreditation through ACSB.

I can tell you that it was a very worthwhile process, that it actually prodded my school and institution into undertaking, you know, improvement initiatives that were well worth it for their own sake, and accreditation actually acted as a

stimulant and an incentivizer for that process.

So it does, of course, it did cost us a little bit to go through that process, but the cost that were truly, you know, accreditation-specific and not related to these worthwhile initiatives were relatively minimal. It had to do mostly with handling the visit and those sorts of things.

But the actual work that we did in the institution, in terms of developing data systems, in terms of developing program review processes and those sorts of things, were all very worthwhile, and I wouldn't consider those costs of accreditation. I'd consider those investments in the quality of the institution.

DR. EWELL: Just one comment. Insofar as the improvement function is concerned, I think that there's very minimal cost, and I think that one of the things that you've seen institutional accreditors, particularly the regionals over the last few years, is an attempt to marry, if you will, the review process with the internal processes of planning and program review that Eduardo noted.

In fact, it's making the process more efficient than I think it was. What is inefficient is essentially an inspector that doesn't add value to the educational process.

DR. EATON: Two points I'd make are one, we attempted some research, CHEA did, on the subject of what is it costing for accreditation several years ago, a number of years ago, and we went out to a representative sample of institutions.

Most of what we got back was estimated and not actual, because a number of institutions had set up cost centers to track their accreditation costs, but a number had not, all right. But what we found, we did not publish this because it was estimated, and I ask you to treat this information that way, now is that less than one percent of what an institution was spending was invested in accreditation, and the preparation and the site visit and the follow-up compliance.

You can amortize that less than one percent over the years of life of the accreditation that you received. Now we can debate whether that's

too much or too little to spend on quality assurance and quality improvement.

Second, you raise the question of a process has bureaucratic elements and regulatory elements. Accreditation does, no question. I would ask all of us to look at the extent to which federal obligations contribute to what some might consider to be too much bureaucracy and too much regulation.

I read the analyses of what regulations are going to cost on the one hand, when rules come out, for example. But I also see what accreditors have to do to implement those rules, and we might all benefit. But thinking about how we can not only modify regulations but perhaps we need fewer, perhaps we need less bureaucracy.

That's not to say that accreditation wouldn't have some bureaucratic and regulatory elements on its own. I believe it would. But a significant driver of those features comes from federal requirements.

CHAIRMAN STAPLES: Judith, I'd like to ask you a question about a distinction you make in your

prepared remarks about the difference between holding accreditors accountable and directing or prescribing accountability.

You mentioned the difference in the areas of specifying curriculum of faculty credentials, and that would be directing or prescribing accountability, and how important that distinction is in terms of keeping, I guess, respecting our role and respecting the role of outsiders in the direction that we give to accrediting agencies.

A question I have. Is there -- if accrediting agencies are expected to look at student learning outcomes, for example, is that by its nature prescribing, directing or prescribing accountability? Or is that the type of issue that can be emphasized in a way that holds accreditors accountable and defers to the mechanisms through which they would monitor that?

DR. EATON: I believe that the way the current statute is written, that accreditors are responsible to examine success with regard to student achievement. That language does hold accreditors

accountable.

It's when, in prior years, and in advisory committee meetings, and I've been to very, very many of them since 1997, we witnessed questions about whether the expectations that have been set by the accreditor are adequate, or whether the accreditation standards are explicit enough or not about what counts as success with regard to student achievement, and suggestions that come back with regard to what those expectations ought to be.

I see that happen in the give and take as well, within the past years, within the accreditation division. The pressure is an informal one. I think it is a powerful one, and as you move, as you do that more and more, you're going to be holding accountable, to stipulating what counts as success with regard to accountability, and that is --

I'm worried about that transition, because the fundamental role of accreditation in setting standards with the community and meeting those standards is undermined. The federal government's a pretty powerful force with regard to all of this, and

that's why I think it's so important that we keep that distinction in mind.

If in the judgment of government, holding accreditors accountable is no longer adequate, we need to talk about that and where we want to go from there, rather than what's happening now.

CHAIRMAN STAPLES: So a discussion around our trying to achieve some understanding of what would be reasonable ways to measure student outcomes, is by its nature prescribing, you think. In other words, that you really can't even agree on what the metrics would be or the measures would be, because that would be dictating the mechanism that accreditors would use to see if institutions met the standards?

DR. EWELL: The prior question is can we even name the outcomes? I mean I think that that's the first thing. I think that the accreditors are very close to saying the same thing there, but they're not saying it very transparently. They're saying it in a different language.

One of the projects that I and some

colleagues have worked on with Lumina support over the past year or so is to create an American equivalent of a degree qualifications framework that every other country has basically got, which says that this is what you've got to know to have a Bachelor's degree.

We're very close to that. If you look at the mission statements of virtually every college and university, they're all saying more or less the same thing. But I think what we need to do is not so much codify that, but the community needs to agree and come forward to you and say this is what we mean, and this is what we're going to hold ourselves accountable for.

Then you get to the measurement question, and the measurement question, there's lots of different ways to do that. There certainly are, it's an emergence of good practice that I think we can publish and talk about, and all of the accrediting organizations are training their institutions as much as possible, to get into that.

But I think we've got to start with the

obvious, which is what do we mean.

CHAIRMAN STAPLES: Thank you very much. Jamie, go ahead.

COMMITTEE MEMBER STUDLEY: I'm thinking about this in part from my past experience as the Department of Education deregulator. So I'm sensitive to the burden questions that people are raising. One of the standard simply mantras we used was that it's not helpful to give people both a recipe and a picture of what they had to come out with, that we should try to regulate one or the other, because otherwise it was a signal that it might be too prescriptive.

So I'd be interested in as you think about performance measures, can you take us a little further down the road in understanding whether you think those are, instead of input measures, how would we transition to that, I think, is a question for both you, Peter and Judith, and what would that look like down the road?

You may have had some more examples of performance measures to share with us. Then Peter,

you raised the good example of the work that you're doing on degree-granting programs. How does this analysis apply to the even wider diversity that includes non-degree programs?

DR. EWELL: Well, just to take the last one first, we didn't do those. We said let's make a start in the universe that we think we can talk about. But the logic of this extends the entire ladder, and we have the example now of the high school exit standards that are being put in place by a number of organizations that do that as well.

So you know, I think the outcomes philosophy, if you will, essentially says we need to remake everything essentially around the notion of certification and attainment. I think that's a vision worth doing.

Now backing up a little bit, I would far rather have us say what's the picture of what the future ought to look like, and then say it's up to the community to figure out how to get there, than the other one. Now the other one certainly is useful for things like malfeasance or, you know, real bad

practice or whatever you need to regulate the how and things of that sort.

But in this area of outcomes, I think that we need essentially all of the innovation, entrepreneurship and creativity we can get, in order to get to some solid bits of evidence, if you will. I think there are good methodologies out there, but they're just beginning to get started.

And it's part of what you guys have been doing in a certain sense to stimulate that industry. I think that industry needs some stimulation and some new creativity.

COMMITTEE MEMBER STUDLEY: Did you want to --

DR. EATON: Yes. Institutions are charged with, given their mission, determining results, and then they're charged with achieving, achieving those results. Student achievement, if you approach it, talking about the individual student, helping to create that teaching and learning judgment, that's a work of faculty. It's not the work of accreditors or government.

The institution sets expectations and attempts to meet them. The accreditor goes in and says what are your expectations vis-a-vis your mission, and the accreditor, and that's peer review. That's professionals looking at professionals, make a judgment about how the institution is doing, and accreditation emerges.

I would disagree a little bit with Peter. I think accreditation's a little more nuanced than up or down for other than federal purposes, because you get accredited with conditions all the time.

So the accreditor looks and says all right, given -- here's a team of professionals. Given what we know about our profession, is this adequate or not? The accreditor comes to you, comes to the Department about being federally recognized.

My sense of the responsibility at your level is to see if the accreditor has the appropriate capacities and procedures and processes and policies in place to do that job well, not to judge the accreditor's decision or judgment about an institution or program. That's the distinction that

I keep trying to get at, would that have been an appropriate thing, that institutions have outcomes and meet them.

That is the role, in my view, of this body. It is not the role of the federal government to say to accreditors "you will have these standards with specific, explicit standards with regard to student achievement."

COMMITTEE MEMBER STUDLEY: And there's something in there about you have certain expectations and you meet them, and they are above some requisite level. I think that's the other key point that I would say.

DR. EATON: The issue is --

COMMITTEE MEMBER STUDLEY: They may be expressed in many different ways appropriate to that field, judged by academics, but the whole enterprise has to be happening here rather than there. That's what we're saying.

DR. EATON: Well, in some ways we're out there looking for a switch, turn it off, turn it on, with regard to when is good, good enough. The

reality is that accreditation as a process is qualitatively-based in many ways; peer review is professional judgment, and does not lend itself to turn the switch off or on, all right.

You're accredited, you're not, and the effort to impose that, I think, would be quite harmful to higher education quality.

COMMITTEE MEMBER STUDLEY: That's the tension that Anne Neal was talking about.

DR. EWELL: I'm not sure -- yes. I'm not sure it's quite that simple, because I mean when you get back to Belle's 12 institutions that were in SACS back in eighteen whenever, they all had to pass a test to get in. I mean it essentially was an admissions process, and the admissions process was then different from whatever came after.

So I think the two functions are important, and accreditation plays both of them. I think that again it's important to recognize how are they separated from one another, and what are the distinct processes that allow one to happen and not necessarily the other? But you know, I'd pushback at

Judith just a little bit.

I mean the public doesn't see the nuanced nature of all of these various judgments. The public sees accredited or not, and it's all a code as far as we in the community, as to know that the University of such and such has been given five years instead of eight. That doesn't come forward as far as public recognition.

CHAIRMAN STAPLES: Art.

COMMITTEE MEMBER ROTHKOPF: I'm okay.

CHAIRMAN STAPLES: Okay, Bill and then -- Bill.

COMMITTEE MEMBER McCLAY: I know it's always dangerous to introduce anecdotes in this kind of discussion, but I'm feeling the absence of something concrete in the discussions, a lot of abstractions being thrown around.

So I'm going to offer a true story, dealing with accreditation, and see how you react to it. This is from my home institution, and it's something that I'm involved in. By the way this, I think, gives a perspective that I think so far hasn't

been incorporated into the discussion, and that is the perspective of faculty, although also parents in my case, of college-aged children.

A number of years ago, when my institution was undergoing accreditation review, the Chancellor called me up and asked me to come see him. The gist of the meeting was that we were running into very heavy weather in the accreditation review over the issue of our mission statement, and the accreditation people were saying you haven't changed your mission statement in ten years.

His position was well, that's because we haven't changed our mission. But we know what we want to do; we've set out what we want to do. We'd like some help in determining whether we're doing it well. But they're saying you need to change your mission statement.

So will you help me tweak the mission statement so it will satisfy them that we're changing our mission statement? Now their rationale for this, near as I could understand, was that to -- for a public university not to change its mission statement

in ten years was a sign of its being or lacking dynamism and so on.

So leaving aside the notion of whether changing the statement changes the institution, we went ahead and did it and it was fine. Everything went through. One point about this little incident is that it, I think, well expresses the attitude of almost all faculty towards accreditation; that is, that it is a --

I'm sorry if this sounds harsh, but I'm trying to reflect the view of the -- the view that I think my peers hold, as a sterile and formalistic process, that doesn't really give institutions any kind of useful feedback about their activities.

That's an unfair view, and faculty are known for being provincial and unfair, and I acknowledge that. But there's something to be said for it at the same time.

But here's my question. Is that an appropriate -- that particular question, why haven't you changed your mission statement, or simply the statement "you haven't changed your mission statement

in ten years," is this an appropriate use, in your view, of the accreditation process?

If as I suspect, I hope you'll say it isn't, what can an institution do about that, and how is the federal role, which I agree, I'm very persuaded, Judith, by much of what you say about this.

But how is the federal government to blame for this kind of busy-bodying or whatever you want to call it, and I'd be very interested if some of the presidents here have had similar experiences that they're willing to talk about?

DR. EATON: Well, I spent 14 years as a college president, and frankly if an accreditor came in to me and said you've got to change your mission, I'd go "huh?" On what basis? And I don't know. Maybe we've strayed so far from our mission that the mission statement needs to change. You didn't include that in your comments. But that would be my reaction.

I don't see how that has any connection whatsoever to the federal interest and the federal

role and the federal government --

COMMITTEE MEMBER McCLAY: Well, what should my chancellor have done, other than say what you've said? My recollection is he did say these things, and simply was told you must change the mission statement.

DR. OCHOA: You should have asked to have the team leader replaced.

DR. EWELL: Which you can do.

COMMITTEE MEMBER McCLAY: Yes, that's right.

DR. EWELL: I think it's okay as a question. It's not okay as a statement. I mean I think that actually it is the role of accreditors to raise those kinds of questions. That's eminently appropriate.

But I mean your anecdote is interesting because I mean I could come back with an anecdote of a wonderful experience with accreditation. The point is the variation; that's the difficulty.

The difficulty is that you can tell one story and you can tell another story, and in an

enterprise that's basically lacking in protocols and lacking in rules of the game, that essentially said here are the boundaries of the conversation; here are the topics that we can talk about and so on, you're going to get that kind of variation.

We did a review of one of the regionals a little while ago, where we brought in quality agency people from other countries, and they basically took a look at what the requirements were, what the institutional report looked like and they said "are you crazy? I mean you can't possibly determine much here. It's all over the place."

So I think that that's more the difficulty than the particulars of the situation that you --

DR. EATON: What I might do is ignore the advice of the team, and then if it showed up in a final team report, then at that point make an issue of it, and Peter and I may be talking about different things.

But accreditation's shot through with rules about how you manage this process. The rules don't circumscribe the activities of teams such as

they must behave in some kind of lockstep fashion, nor do I think they should.

CHAIRMAN STAPLES: Bill?

COMMITTEE MEMBER PEPICELLO: Mine is more of a comment, perhaps, for your reaction. To go back to the recipe and the picture, for me, because I deal with all three pieces of the triad on a regular basis, and that is with 40 states, the Feds and accreditors, if you look at what that picture is, if you ask any of the three pieces of the triad what that picture is, it's going to be different.

From my perspective, the larger picture of the future is more like a jigsaw puzzle, and the pieces of the puzzle are all different shapes and sizes, and that would be the triad.

We'd need to somehow align those three, so that when we put the pieces of the puzzle together, we get the overall picture that we want, but it incorporates somehow an alignment of those three areas, just to use a bit of a different metaphor.

DR. EWELL: I think that's very well said. I think that even though your remit is essentially is

around institutional accreditation, because that was the CT does. In the run-up to reauthorization, we need to look at the whole triad. We need to look at the roles and responsibilities of each member, and the states need looking at as well.

And there are a number of other players out there that are not official members of the triad. I mean we have a fourth estate out there consisting of policy organizations that in a sense are making policy too. I think we need a critical reexamination of the whole thing.

DR. EATON: Dr. Ochoa said something I thought was extremely important, and that is the shift in responsibility and the larger role, as I heard him, of the federal government. That in and of itself speaks to reconsideration of the triad, as you're suggesting.

CHAIRMAN STAPLES: We have pretty much exceeded our time, but I wanted to give Susan a chance to ask a question, and hopefully that will be our last part of this panel.

COMMITTEE MEMBER PHILLIPS: Getting the

last word, hey. My question is actually for Peter to come back to a couple of things that you said at different points in your remarks.

You talked about our quality assurance system, our accreditation system, our higher education system as being sort of the envy of the world, and yet it is clearly a system which could benefit from some further development, shall we say.

So the question that I have is how do you reconcile the notion of having such a well-regarded quality assurance system, and yet having so many holes in it, such as the site visitor problem.

So we have this great quality assurance system, a great higher education system, and a quality assurance process that doesn't seem to correlate with that. So could you --

DR. EWELL: I think it may be that other countries are looking at what we have in accreditation with envy because they don't really know how it works. I mean they haven't really experienced it in a lot of ways. But you do have South and Central America, in particular, that are

inventing accreditation in all kinds of different ways.

I think that what's appealing is essentially the institutional determining of things, the mission-centeredness, the improvement orientation and things of that sort. As I say, when the folks that had reviewed the documents that I mentioned took a look at it, they said essentially the downside of this is its lack of discipline.

I think that what we need is a system that has all those virtues, but is a more disciplined system than we currently have. I mean an analogy that I like to use, that I'll leave you with, is that in many ways accreditation is like the financial audit on the academic side.

I mean what accreditation does is it says essentially this institution is operating according to commonly-recognized quality principles, and you can believe its bottom line, and its bottom line in this case is the learning, the statements about learning that it does. That's what I think accreditation does and what it needs to be held to.

COMMITTEE MEMBER PHILLIPS: Thank you.

CHAIRMAN STAPLES: Thank you very much. This has been an extremely enlightening discussion, and we really do appreciate your participation. We will now be taking a ten minute break and we'll reconvene then. Thank you.