
Accreditation and Accountability

Testimony to the National Commission on Accountability in Higher Education
State Higher Education Executive Officers

Provided by the
Council for Higher Education Accreditation

April 8, 2004 (Revised)

The Current Climate for Accountability

From corporate and church scandals and vastly expanded scrutiny fueled by 24-hour news and the Internet, every aspect of American life seems to be experiencing newly emphasized demands for better accountability. In higher education, the combination of highly visible price increases and public uncertainty or ambivalence on the relevance of the “product” to the future needs of the student seems to give voice to higher expectations of accountability. We often hear demands for better public means of demonstrating the value of higher education to its stakeholders, constituents and supporters. While the so-called “public demand” for higher education proving its worth may be overstated, it is a constant theme from public officials, journalists and opinion leaders.

Higher education needs an additional compelling means of demonstrating its accountability – what we do and how well we do it – while preserving the fundamental nature of our enterprise. In the United States, this means that the discrete and unique mission of each institution of higher education and the educational goals of the students it serves must be put forward as the proper framework for measurement of accountability and response to these “public demands.”

Higher education leaders can also seize the opportunity to inform our audiences that not all forms of accountability are appropriate for higher education. For example, a set of simple, uniform, universal quantifiable measures are viewed by some as a desirable approach to higher education accountability. Yet, this would be more misleading and less useful than accountability mechanisms that are grounded in a commitment to institutional mission

Summary

This testimony addresses accreditation and accountability and offers several recommendations for consideration by National Commission on Accountability in Higher Education.

The Council for Higher Education Accreditation (CHEA) seeks to strengthen the usefulness of accreditation to state policymakers through:

- Further expanding the attention to accountability within accrediting organizations;
- Identifying effective practices in state-accreditation relationships that can assist states in addressing accountability; and
- Using tools developed through accreditation to focus additional attention on student protection, especially dubious providers of higher education in the form of diploma mills and accreditation mills.

CHEA offers these recommendations for the commission’s consideration:

- ***National Policy on Accountability***—Endorse the CHEA commitment to accountability reform as a basis for national policy on accreditation and accountability and as one means of reinforcing and enhancing the commission’s work on state accountability.
- ***Models of Effective Practices in Accountability***—Support exploration and development of individual state-accreditor models of effective practice in accountability.
- ***Accountability and Student Protection***—Support state leaders in a reexamination of licensure practices to diminish the likelihood of degree mills and accreditation mills and explore working more closely with accrediting organization in this effort.

and the educational goals of students. Rigid, quantitative measures could do more harm than good.

Further Expanding Attention to Accountability within Accrediting Organizations

The expertise and mission of the Council for Higher Education Accreditation (CHEA) lies mostly in accreditation, the voluntary peer-based systems that our colleges and universities have used successfully to review and improve their quality for a century.

Accreditation was not invented to serve a governmental need, although it has served the public interest from its inception. Accreditation is buttressed by many other forms of accountability in higher education, perhaps most significantly, the marketplace in which United States institutions compete vigorously for students, resources and public acknowledgment of quality. The other forms of accountability also include fiscal reporting and control, state licensing, institutional governance and administrative and academic leadership in reviewing and improving the academic offerings of an institution.

CHEA initiated its work on accountability and accreditation in 2000-2001 when the CHEA Board of Directors approved student learning outcomes and accreditation as a major organizational priority. Attention to student learning outcomes began with the publication of *Accreditation and Student Learning Outcomes: a Proposed Point of Departure* (2001) by Peter Ewell of the National Center for Higher Education Management Systems (NCHEMS). This CHEA *Occasional Paper* provides a blueprint by which accrediting organizations, working with their institutions and programs, can determine if and how they will address student learning outcomes. The release of the paper was followed by a series of workshops on outcomes in 2002. Most recently, CHEA laid out a set of principles by which to address student learning outcomes in its *Statement of Mutual Responsibilities for Student Learning Outcomes: Accreditation, Institutions and Programs* in 2003.

The CHEA commitment to accountability is also at the heart of its agenda for the reauthorization of the Higher Education Act (HEA) currently underway.

The *Reauthorization Agenda* (attached) stresses accountability reform as vital to the continued effectiveness of accreditation in the key policy areas of distance learning, transfer of credit and information to the public. Accrediting organizations, institutions and programs are well served by routinely providing more information about educational quality to students and the public, especially when this information focuses on institutional performance and student achievement. Efforts to achieve enhanced accountability to students and the public need to take place within the mission-based, decentralized system of higher education with its strong commitment to institutional independence and academic freedom.

CHEA recommends that the commission endorse the CHEA commitment to accountability reform as a basis for national policy on accreditation and accountability and as one means of reinforcing and enhancing its work on state accountability.

Identifying Effective Accountability Practices in State-Accreditation Relationships

The history of state-accreditation relationships is spotty at best. A few states rely on accreditation when licensing institutions; most do not. Some leaders in accreditation are reluctant to become involved with state government if this means that their independence could be compromised by their organizations being viewed as "arms of the government." Institutions sometimes complain of unnecessary duplication between the demands of state program review and accreditation.

In addition, the higher education enterprise is decentralized, with 50 states sustaining distinct accountability practices and 80 recognized accrediting organizations that are private bodies with distinct standards and policies. While maintaining the richness and diversity associated with a decentralized enterprise, SHEEO and CHEA can nonetheless assist states and accreditors to develop, where appropriate, individual state-accreditor partnerships in accountability. The partnerships could develop models of effective practice in a range of areas where both states and accreditors are involved. For

example, interested states and accrediting organizations might address:

- Data collection and analysis: coordination of data reporting to both states and accrediting organizations as needed;
- Combined state-accreditation program review in select professional programs to preclude unnecessarily duplicative reviews; and
- Analysis and coordination of accountability expectations from states and accrediting organizations to diminish the likelihood of unnecessary burden on institutions.

CHEA recommends that the commission consider support for exploration and development of individual state-accreditor models of effective practice in accountability.

Using Tools Developed Through Accreditation to Focus Additional Attention on Student Protection and especially Diploma Mills and Accreditation Mills.

One of the most vexing issues in quality assurance in higher education is the need to protect students from dubious providers of higher education and especially the challenge posed by diploma mills and accreditation mills. States, charged with chartering and licensing of higher education providers, have a major responsibility in this area. Accrediting organizations are confronted with unprecedented numbers of accreditation mills and are beginning to explore appropriate action in this area.

Diploma mills and accreditation mills mislead and harm. In the United States, degrees and certificates from diploma mills may not be acknowledged by other institutions when students seek to transfer or go to graduate school. Employers may not acknowledge degrees and certificates from diploma mills when providing tuition assistance for continuing education. "Accreditation" from an accreditation mill can mislead students and the public about the quality of an institution. In the presence of diploma mills and accreditation mills, students may spend a good deal of money and receive neither an education nor a useable credential.

Identifying diploma mills and accreditation mills is

not easy. A number of the features of diploma mills are similar to familiar higher education institutions. A number of the features of accreditation mills are similar to well-known accrediting organizations. Nonetheless, prospective students and the public can look for several indicators that suggest an operation may be a diploma mill or an accreditation mill (please see attached). It is the presence of a number of these features taken together that should signal to students and the public that they may, indeed, be dealing with a mill.

To date, there have been three approaches to addressing mills in which some accrediting organizations and others have been engaged: (1) a "shine the light on the problem" approach characterized by identifying institutions and accreditors that are considered mills, (2) identifying the universe of reliable institutions and accreditors, and (3) developing tools for students and the public that enable them to make judgments about reliable providers of higher education. All are effective to some extent. At the same time, mills continue to emerge and function successfully.

CHEA recommends that state leaders examine licensure practices to diminish the likelihood of degree mills and accreditation mills and explore whether it would be appropriate to work more closely with accrediting organization in this effort. In addition, state leaders and accrediting organizations can continue to address distance delivery of higher education (electronic, video-based, mail-based) and how to assure that students and the public in their respective states are protected from dubious providers at a distance.

CHEA thanks the commission for this invitation to share our views and extends best wishes for success in your important work.

Attachments (2):

- CHEA *Reauthorization Agenda*
- CHEA *Fact Sheet #6: Important Questions About "Diploma Mills" and "Accreditation Mills"*

COUNCIL FOR HIGHER EDUCATION ACCREDITATION

A Reauthorization Agenda for Accreditation and Accountability Reform

May 2003

An Agenda for the Congressional Reauthorization of the Higher Education Act

INTRODUCTION

THE COUNCIL FOR HIGHER EDUCATION ACCREDITATION (CHEA) REAUTHORIZATION AGENDA places primary emphasis on accountability reform in accreditation. The six goals of the agenda call on accrediting organizations, institutions, and programs to strengthen and expand the commitment to accountability in accreditation as key to meeting the changing needs of higher education and society.

Accountability reform must take place in a context of continued commitment to self-regulation through accreditation as the central means of assuring the independence and academic quality of higher education. Advocacy for a strong system of accreditation is also advocacy for the current mission-based, decentralized structure of higher education with its core commitments to institutional autonomy and academic freedom.

The CHEA Reauthorization Agenda builds on the current strengths of accreditation:

- Accreditation *provides value* by routinely affirming and working to improve the academic quality of higher education.
- Accreditation *has historically been accountable* to students, families, government, and the public as part of a range of accountability initiatives used by higher education institutions, faculty, and governing boards.
- Accreditation *is responsive* to significant changes in higher education, such as distance learning and international education.

GOALS FOR ACCREDITATION AND ACCOUNTABILITY REFORM

CHEA's reauthorization goals address accreditation and accountability in relation to student learning outcomes and institutional performance, information to the public, distance learning, transfer of credit, and key principles of accreditation. The goals also include proposed legislation for accreditation and accountability reform.

Goal 1. Expand development and use of evidence of student learning outcomes as well as evidence of institution and program performance in accreditation review in order that this evidence play an increasingly influential role in judgments about academic quality and accredited status.

Goal 2. Expand information to the public about the findings of accreditation review as this information is developed by accrediting organizations, institutions, and programs.

- Goal 3.** Assure quality in distance learning by calling for appropriate quality review of any distance learning providers or offerings that are newly eligible for Title IV (Student Assistance) funds.
- Goal 4.** Take additional steps to strengthen transfer of credit to meet student access and mobility needs in those instances in which accredited status may be problematic as transfer decisions are made by institutions and programs.
- Goal 5.** Advocate accountability reform in accreditation in the context of four principles on which accreditation operates:
- Accreditation is committed to the *efficacy of a national decentralized, mission-based approach* to higher education as well as to accreditation.
 - Accreditation *is a private self-regulatory undertaking* and not a state actor or arm of the government.
 - Accreditation has *primary responsibility for judgments about academic quality in higher education.*
 - Accreditation is responsible for *judgments about the general fiscal and administrative soundness of institutions and programs*, but not for their compliance with Title IV (Student Assistance) of the Higher Education Act (HEA).
- Goal 6.** Present proposed legislation (*The Academic Quality and Higher Education Accountability Reform Act of 2003*) for accountability reform in accreditation and commitment to the value of accreditation to assure academic quality.*

*Under development

THE COUNCIL FOR HIGHER EDUCATION ACCREDITATION (CHEA) is a nationally based, nonprofit organization that coordinates institutional and programmatic accreditation and represents degree-granting institutions and accrediting organizations. CHEA's primary responsibilities are advocacy for self-regulation of higher education through voluntary accreditation, scrutiny ("recognition") of accrediting organizations, and articulation and presentation of key accreditation issues and challenges to higher education, government, and the public.

CHEA[®]

Council for Higher Education Accreditation

One Dupont Circle NW • Suite 510

Washington DC 20036-1135

tel: (202) 955-6126 • fax: (202) 955-6129

e-mail: chea@chea.org • www.chea.org

FACT SHEET # 6

Important Questions about “Diploma Mills” and “Accreditation Mills”

May 2003

In their quest for higher education and training, students and the public in the United States sometimes encounter “diploma mills”—dubious providers of educational offerings or operations that offer certificates and degrees that are considered bogus. They may also encounter “accreditation mills”—dubious providers of accreditation and quality assurance or operations that offer a certification of quality of institutions that is considered bogus.

Diploma mills and accreditation mills mislead and harm. In the U.S., degrees and certificates from mills may not be acknowledged by other institutions when students seek to transfer or go to graduate school. Employers may not acknowledge degrees and certificates from diploma mills when providing tuition assistance for continuing education. “Accreditation” from an accreditation mill can mislead students and the public about the quality of an institution. In the presence of diploma mills and accreditation mills, students may spend a good deal of money and receive neither an education nor a useable credential.

Internationally, diploma mills and accreditation mills are a disservice to the public in several ways. U.S. diploma mills and accreditation mills that have become items for export cast doubt on the reliability of legitimate degrees and accreditation. Students from outside the U.S. can be vulnerable because they have limited information and experience by which to judge whether or not a U.S. operation is a “mill.” Governments outside the U.S. seeking to learn about accredited status of U.S. operations can be vulnerable as well. Unsuspecting students and governments of other countries may know only that a provider is “American” and not be aware that it is a mill.

There is no single definition of “diploma mill” or “accreditation mill” in higher education. While a few states have laws or regulations regarding these operations, most do not. Some agencies of the federal government may scrutinize diploma mills or accreditation mills, but this is quite limited to date. In general, diploma mills would not pass the initial screening of accrediting organizations (review for eligibility, candidacy, or initial accreditation) and thus fall outside the purview of these bodies. Similarly, accreditation mills would struggle with the pre-screening for recognition and thus escape this scrutiny as well.*

Identifying diploma mills and accreditation mills is not easy. A number of the features of diploma mills are similar to familiar higher education institutions. A number of the features of accreditation mills are similar to well-known accrediting organizations. Nonetheless, prospective students and the public can look for several indicators that suggest an operation may be a diploma mill or an accreditation mill. *It is the presence of a number of these features taken together that should signal to students and the public that they may, indeed, be dealing with a “mill.”*

(continued on next page)

* In the United States, an accrediting organization may seek a review for quality (or “recognition” review) from the federal government through the U.S. Department of Education or privately, through the Council for Higher Education Accreditation. “Recognized” accreditors are those organizations that have successfully undergone an external review of their quality based on the standards of these entities.

A series of questions follows to help determine whether a provider is a diploma mill or an accreditation mill. In each case, if, for example, the answers to a majority of the questions below are “yes,” students and the public should take this as highly suggestive that they may be dealing with a mill. In this circumstance, students and the public may be best served by looking for alternatives for higher education and quality assurance.

DIPLOMA MILLS

If the answers to many of these questions are “yes,” the operation under consideration may be a “mill”:

- Can degrees be purchased?
- Is there a claim of accreditation when there is no evidence of this status?
- Is there a claim of accreditation from a questionable accrediting organization?
- Does the operation lack state or federal licensure or authority to operate?
- Is little if any attendance required of students?
- Are few assignments required for students to earn credits?
- Is a very short period of time required to earn a degree?
- Are degrees available based solely on experience or resume review?
- Are there few requirements for graduation?
- Does the operation charge very high fees as compared with average fees charged by higher education institutions?
- Alternatively, is the fee so low that it does not appear to be related to the cost of providing legitimate education?
- Does the operation fail to provide any information about a campus or business location or address and relies, e.g., only on a post office box?
- Does the operation fail to provide a list of its faculty and their qualifications?
- Does the operation have a name similar to other well-known colleges and universities?
- Does the operation make claims in its publications for which there is no evidence?

ACCREDITATION MILLS

If the answers to many of these questions are “yes,” the operation under consideration may be a “mill”:

- Does the operation allow accredited status to be purchased?
- Does the operation publish lists of institutions or programs they claim to have accredited without institutions and programs knowing that they are listed or have been accredited?
- Are high fees for accreditation required as compared to average fees from accrediting organizations?
- Does the operation claim that it is recognized (by, e.g., USDE or CHEA) when it is not?
- Are few if any standards for quality published by the operation?
- Is a very short period of time required to achieve accredited status?
- Are accreditation reviews routinely confined to submitting documents and do not include site visits or interviews of key personnel by the accrediting organization?
- Is “permanent” accreditation granted without any requirement for subsequent periodic review?
- Does the operation use organizational names similar to recognized accrediting organizations?
- Does the operation make claims in its publications for which there is no evidence?

CHEA

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One Dupont Circle NW • Suite 510

Washington DC 20036-1135

tel: 202-955-6126 • fax: 202-955-6129

e-mail: chea@chea.org • www.chea.org