***Accreditation and Its Discontents***

Remarks for the Annual Meeting of the

Higher Learning Commission

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We live in an age of intense [discontent](http://www.gallup.com/poll/1597/confidence-institutions.aspx) with institutions and their industries. Name even one major institution or industry that is not a source of intense aggravation, suspicion, scandal, hostility and downright contempt in some quarters. Congress? Banking? The Church? Baseball? The American Presidency? Greece? The SAT? Law School? Higher Education? K-12 Education? Newspapers? Hollywood? Apple? Healthcare? Heck, even the [Girl Scouts](http://www.huffingtonpost.com/patricia-mcguire/bob-morris-girl-scouts_b_1302196.html) are denounced as purveyors of evil, and I’m not talking about packing on pounds with Thin Mints.

We work in a time of extreme judgmentalism when any self-styled Robespierre with an internet connection can launch a reign of terror fueled by rumors and innuendoes and half-truths and whole lies. We all know the particular hell of the virulent blogosphere.

Government struggles to find its footing in this climate of constant complaint and demands that government stay out --- except where called in --- to protect, enable, defeat, release or otherwise address the competing demands of hundreds of millions of self-governing citizens organized into various directorates sometimes called parties --- Republican, Democrat, Tea, Green, whatever.

No wonder government over-reaches at times; the deafening cacophony of an electorate in full and apparently perpetual primary bore makes it hard to think straight.

A right-thinking government wants to protect its citizens against all kinds of harm, of course, including the harm of scoundrels peddling scurrilous diplomas. A government dazed and confused by the cacophony decides that the only way to impose order on the chaos is to treat everyone as a scoundrel out to mislead, deceive or confuse the innocents.

And, yes, in a climate of excessive judgmentalism and a pervasive sense of “*J’accuse!*” for just about anything, no government can be quite big enough to regulate, investigate, corroborate and adjudicate all of the complaints arising from not only the occasions of genuine malice on the part of institutional agents, but also, the far more numerous occurrences of bad judgment, inadequate research, laziness, alcohol, the locations of girlfriends and sheer whim that lead to faulty consumer choices in higher education.

I’ve yet to find a database that can adequately warn applicants about the dangers of broken hearts on any given campus. We’ve yet to come up with the “new and more tolerant perspective scorecard” that indicates how much philosophical change the student will experience as a result of a college education. We are years away from creating the perfect app that will tell a student at age 19 or 20 exactly what major program will give her every single skill and factoid she will need for the job she will hold when she is 45.

But if only accreditation would do its job, our students would have that perfect college selection calculator, wouldn’t they?

Of all of the vexatious, often-misguided and predictably intrusive regulatory behaviors affecting higher education, none portends graver long-term consequences for the freedom and efficacy of colleges and universities than the misguided federal efforts to control private voluntary accreditation as a not-so-subtle attempt to control higher education, itself. The presumption behind so much Congressional and regulatory behavior seems to be that absent the big stick of government regulation wielded through increasingly onerous accreditation rules, we’re all out to rip off our students and we don’t care one whit about whether they’re learning anything. This is preposterous, of course, but being preposterous has yet to stop a member of Congress from writing sanctimonious legislation.

Yes, to a great extent, the horse is long gone from this barn, and railing against the government’s desire to exact an increasingly high price for federal financial aid seems like a fairly useless endeavor. I’ve been a president for 23 years (how astonishing that sounds even to me!) and I can safely say that I cannot recall a single year during that time when accreditation was NOT on some griddle for something or other. So, I say to myself, “Get over it, deal with it, regulation of and through accreditation is here to stay.”

I like what Judith Eaton of CHEA had to say about this. Calling it “[Accreditation’s Accidental Transformation](http://www.chea.org/pdf/Inside%20Higher%20Ed%20Op-Ed.pdf),” she wrote in *insidehighered.com*:

*“Academic quality assurance and collegiality -- the defining features of traditional accreditation -- are, at least for now, taking a backseat to consumer protection and compliance with law and regulation. Government and the public expect accreditation to essentially provide a guarantee that students are getting what they pay for in terms of the education they seek.*

*“Blame the enormous amount of taxpayer money involved (some $150 billion every year at the federal level alone), which puts more and more pressure on accreditors to give more and more attention to assuring that taxpayers’ money is well-spent. “Well-spent” is not about abstract notions of quality.*

*“Blame the powerful demand that, above all, colleges and universities provide credentials that lead directly to employment or advancement of employment. Driven by public concerns about the difficult job market and the persistent rise in the price of tuition, accrediting organizations are now expected to assure that the colleges, universities and programs they accredit will produce these pragmatic results.”[[1]](#footnote-1)*

(Let the record reflect, by the way, that higher education did not cause the recession; I seem to recall that failed banking regulation had something to do with that. We seem to be the whipping boys and girls --- I guess it’s easier to regulate educators than bankers, so we’re getting *their* share of it! Next thing you know, the government will say that higher education must be held accountable for all of the foreclosures resulting from subprime mortgages because we educated the bankers who snookered the consumers who we also failed to make more skeptical of too-good-to-be-true loans. Wait --- aren’t they already creating that model with the proposed new rules to evaluate schools of education based on the test results of the pupils of teachers who graduate from our colleges? Regulation by slippery slope is very dangerous!)

Against this backdrop, I pose three questions this morning: What is at stake right now? What can we do to ensure continuing independence for higher education? Will anything we do make a difference in the long run?

First, what is at stake right now?

The immediate issue is who gets to define “educational quality” in higher education.

But lurking behind that oft-wonky data-driven discussion is the ultimate issue of the genuine independence of all of higher education as an industry, whether public or private institutions. Higher education is the great counterweight to government in a free society. Our purpose is not the same as the government’s. Our purpose in the discovery, creation and transmission of knowledge is essential to human advancement. While government may have a legitimate interest in supporting this purpose as a public good, the pursuit of advanced knowledge must occur in complete freedom from political entanglements or, for that matter, even private interests that would interfere with the independent search for truth.

In the same way, in higher education the teaching enterprise is not some advanced version of the K-12 idea of learning that, for better or worse, entails the relatively passive absorption of already-established bodies of knowledge. Among various states, we clearly see the ways in which the “culture wars” manipulate K-12 textbooks in history or social sciences or literature to satisfy political ends.

With the support of a great deal of private philanthropy as well as federal mandates, we also are seeing increased nationwide standardization of the K-12 curriculum driven by test mania, robbing teachers of any independent judgment about teaching their particular students with appropriately designed lesson plans, but, at the same time, holding them responsible --- under threat of losing their jobs --- for the systematic conveyance of other people’s decisions about content and assessment measures.

Higher education’s very being rejects the notion that there is one standard version of, say, American History, to cite just one example. Our constant quest is not to force all faculty to adhere to the same text, at all, but on the contrary, to insist that they must reconsider and change the text continuously --- as the results of good assessment should make clear.

The reality is that the best of American higher education believes that the teaching and learning experience is unique in every encounter, that every faculty member is a leader in the journey of discovery with students, that each class and course must be open to new designs, new learning objectives and new pedagogies because --- if we believe in the true dialectic of assessment --- we learn how to do it better and differently every time we teach. And we teach, not to create automatons who can regurgitate what we tell them on standardized tests, but rather, independent self-directed minds whose ultimate goal is to challenge well, and sometimes successfully, every thing we try to teach them.

Hence, the best of higher learning is an ongoing argument, a well-informed debate that peels away assumptions and conventional wisdom to discover the kernels of truth obscured by history and bias and laziness and political manipulation and prior bad work. We are like curators removing so many layers of grime from a Michelangelo masterpiece; in the discovery of the true original, we set off ferocious arguments over whether the new vision is authentic, or a distortion of all that we once knew and believed to be true.

This is why conservatives think that college ruins the mind, because higher learning, done well, makes the student question everything by probing down through the layers of artifice to get at the truth. The truth, as we know, can be deeply, profoundly, disturbing and disorienting.

No Truth Left Behind! How would the Department like to measure that?

So, now we come closer to accreditation and its discontents: the government remains discontent, highly irritated that some of us proffer the “excuse” of the inevitably hard-to-measure search for Truth as our *raison d’etre*, a checkmate position that seems to shut down the argument. Does the government of a democracy really want to interfere with academic and intellectual freedom? As of now.... no. They simply want measurable results, gosh darn it!

And on the other side of our discontent we behold our faculty in splendid array, as we presidents, wearing our accreditation mantles and hoisting the shields of the standards, gingerly approach the opposite ridge to say: we really could solve this problem if we produced better assessments.

*Oh, tempora! O, mores![[2]](#footnote-2)*

“Assessment,” as a faculty member at a nameless institution snarled at me on a Middle States visit I chaired a few years back, “Assessment is a right-wing administrative plot to rob the faculty of our freedom! We must resist the assessment movement at all costs!”

*Sancho! My armor! My sword![[3]](#footnote-3)*

Good heavens. It’s really just being able to demonstrate that our students actually learned what we set out to teach them. How hard is that?

We are a decade or more into the assessment movement that is largely a result of accreditation’s forecast that we’d better do it ourselves before the government mandated it in their own way. And, certainly, after all of this time, many if not most institutions are doing a credible job of organizing and producing assessment data for both regional and specialized accreditors. Yet, we continue to see too many institutions getting failing grades on meeting assessment standards, and at the same time, some fairly wealthy and prestigious places put a lot of energy into whining about the ‘burden’ of assessment and, indeed, accreditation itself. We have too many colleagues who seem willfully clueless in failing to make the urgent connection between making sure that higher education, itself, *owns* the definition of “educational quality” and providing evidence of exactly that in great assessment and accreditation reports. If we want to own it, we have to earn it and prove it continuously.

Meanwhile, the more the “ivory tower” is perceived as whining, the more incentive public officials and their allies in the regulatory agencies --- and the not-inconsiderable voices of editorial boards ---- have to impose their own version of outcomes assessment, which comes handily packaged with bubble sheets.

Which leads me to my second question: in this environment, what can we do to ensure continuing independence for our enterprise in higher education?

I am tempted to say: stop whining! But some colleagues might find that offensive, or just impossible. So, let me do what all presidents do when we have hard messages to deliver: let’s talk strategic planning!

We have to demonstrate a serious capacity to change this industry --- to clean-up our obvious deficiencies, to abandon our defensiveness in the face of severe criticism, and, even more important, to align our teaching and research even more thoughtfully and effectively with the long-range needs of our economy and society. We have to do this in concert with our colleagues in government, K-12 education, the corporate and public interest sectors. We’re not here to perpetuate our institutions for themselves; we are not curators of museums to our glorious pasts. Our institutions must serve a clear and central public purpose, now and in the future, or we make ourselves both irrelevant and even more exposed to government takeover through regulation.

We’re not going to transform this industry by talking about change; we have to engage the hard work of planning for change. And assessment at all levels provides the essential data and information to make the plans more dynamic and responsive to changing conditions. And, by the way, that very same data and information gives us precisely the platform on which we can communicate our results far more effectively with our many publics, including our prospective students, our accreditors and our regulators.

We need far more effective planning and assessment for institutional and industry-wide transformation in higher education because the demographic, economic, technological and cultural characteristics of our society have changed quite radically in the last half-century, and will continue to change in even more pronounced ways in the future. The 22 million students already enrolled in higher education this year represent a far different profile of college students than in the past --- consider the fact that the National Center for Education Statistics has already made it clear that nearly 75% of all college students have “non-traditional” characteristics, and yet, we are still operating on assumptions largely applicable only to highly traditional students.

The profile of our students will continue to change dynamically as increasing proportions of new populations of students enroll --- Hispanic, African American, students from immigrant families, first generation students with high financial need and often marginal academic preparation. They will be enrolling in programs for burgeoning industries --- healthcare, media and telecommunications, hospitality or other services --- and engaging in forms of learning previously unimagined, driven by pervasive technology and access to knowledge sources previously kept locked up in libraries.

The nature of knowledge acquisition, pedagogy, assessment of learning, and work, itself, are all experiencing radical, even disruptive transformation. Indeed, our own workplaces have changed dynamically in many ways in the last two decades --- and yet, the academy generally clings to modes of operation and structures of work that are deeply rooted in the design of the medieval college.

The imperative for transformation is clear; either we will do it, or others will do it for us --- very badly, in ways that are harmful and not visionary, to be sure, but they will if we don’t get there first. That’s what’s at stake today in the struggle over accreditation.

No institution can or should claim a “pass” at this moment. Institutions with a lot of prestige and big endowments and lots of ego investment should be leading the way in creating effective responses to the public demand for greater, more transparent accountability. Set some example, folks! Rather than seeking a “pass” on worthy and rigorous accreditation review, the more elite institutions could be helping the rest of us do it even better by engaging the assessment process with creative energy and vision, sharing better practices and even lending tangible research support to the smaller institutions serving needier students who often do not have the bandwidth of time or resources to do the deep analysis that proves educational effectiveness in creative new programs for previously marginalized students.

Now that I’ve managed to upset a lot of colleagues, let me keep going out onto that thin ice and suggest a few other things we must do to bolster our independence by demonstrating real seriousness of purpose about some bedrock transformation of higher education.

Instead of whining about the cost of accreditation, let’s transform our work to embed the best practices of planning and assessment in our daily routines. So long as we treat accreditation and assessment as something “extra,” outside of our routine operations, it will be an additional burden. Re-engineering our workplaces to embed best practices is a more economically efficient approach, but not without resistance from the old order.

What am I talking about? In my own institution, Trinity, in my early years I spent a great deal of time persuading both faculty and staff that the work of planning and assessment was not “volunteer service” above and beyond their “real” work. I got a lot of pushback from those who felt that they did not have to explain themselves to anyone --- the essence of accountability. I did have the advantage of an institution that spent years struggling to thrive, and in many ways, Trinity’s long-suffering quest for a better life made it somewhat easier to bring a critical mass of colleagues along for the ride in a new direction. Over time, our faculty and executive team began to take great pride in producing terrific reports on the results of their assessments, which became the basis for accreditation reports. Along the way we learned a great deal about how to re-engineer programs, processes, courses and services to serve our dynamically changing student population more effectively --- which is, of course, the entire point of the effort.

Trinity is an interesting example of an institution that learned how to grow and change strategically with the leverage of accreditation. An accreditor or regulator less astute about mission than Middle States would have posed a serious threat to our ability to traverse the treacherous terrain of transformation in the 1990’s. But Middle States, with its clear focus on mission as the guidepost for accreditation, kept forcing Trinity to return to the central question of our own continuing existence: how does mission drive institutional transformation? What does transformation mean for how we must adapt curricula, programs and services? What evidence do we have that we have managed to sustain educational quality and effectiveness in the midst of so much change, particularly with students who need so much more support?

Trinity was founded to create access for Catholic women who had no real access to college in DC in 1897; access for women remains our central mission commitment today, albeit with radically different populations of women than those who needed us in the past. Our 2500 students today are predominantly low income African American and Latina women (and some men in our professional studies and graduate programs) from our city and the Washington region, and they thrive at Trinity with as much zeal as past generations. But they are dramatically different from the women of Trinity’s past generations, and a Middle States reviewer once noted, quite astutely, that Trinity’s decision to stick with the primary mission to women was a far more radical choice than if we had “gone coed.” Making our historic mission to women thrive in the modern age required a complete change in focus, curricula, programs and pedagogies, and that “paradigm shift” in students and curricula became the emphasis of our successive accreditation reports in the last two decades.

I cannot imagine how any standardized accreditation protocol or regulatory agents could have helped us through those difficult years, but our visitors from Middle States --- and they were numerous at times, both peer reviewers and association staff --- were constructive, challenging and insightful as we engaged the transformative process. When a group of angry Trinity alumnae appeared unannounced in the middle of one accreditation site visit, demanding to meet with the visiting team to tell them how profoundly I had destroyed their once-glorious institution, the team chair --- president of another women’s college who well-understood the culture of angry women’s college alumnae --- met with them and heard them graciously while I sat fuming in my office. A regulatory agent might have called the police, or at least marked us down for further investigation. The peer reviewer completely understood that the kind of change we were managing would provoke resistance and dismay, which might actually be evidence that we were doing exactly the right thing. Peers understand that the noise is part of the process; government agents and, unfortunately, Congressional committee chairs usually think that complaints always mean that something is wrong, rather than hearing them as evidence that change is at work.

Keeping a rigorous focus on mission as one of the hallmarks of independent, private, voluntary accreditation is an urgent priority to sustain the independence and diversity of American higher education.

Another point: we must stop being so opaque about our work, both our accreditation reviews and our assessment results.

For people whose life’s work is all about communicating, we’ve done a fairly poor job of making our work and our results clear, accessible and persuasive to our various constituencies.

Other people are already trying to do that communication for us, and so we wind up with the grand illusions perpetuated by the rankings games, for example --- the annual [*U.S. News*](http://www.womenscolleges.org/story/college-ratings-game) beauty contest is like “[Hunger Games](http://www.thehungergamesmovie.com/)” for wonks. How many goodies did you snatch from the mouth of the [golden cornucopia](http://thehungergames.wikia.com/wiki/Cornucopia)? Rankings are all about winning and losing according to some bystander’s version of what counts. Almost none of them are about the core mission of university life in teaching and learning across an astonishing array of disciplines.

Our work is complicated, and demonstrating educational quality defies reduction to an easy data set. How we measure quality in our Nursing Program, for example, is quite different from how we measure quality in first year general education, and different again from the Psychology major or MBA. We expect every course and every academic program to establish quality measures, which is the basis for assessment, and to apply those measurements consistently. We look for evidence of consistency in the course syllabi, the analysis of entrance, mid-term and exit data for gateway courses at least, the results of sophomore and junior seminars, the summative assessments in senior capstones, the theses and other evidence produced in graduate programs, the success data gleaned from professional licensure examinations.

Can we tell this complicated story more effectively? Yes, but it’s not a simple one-pager, or a scorecard. We need to do a better job communicating the diversity of higher education, not simply by institutional type, but in reality, by disciplinary fields, degree levels and the broad range of intellectual, social and cultural activities we undertake every single day.

Will anything we do change the likely outcome?

Of course --- but only if we are willing to demonstrate bold, gutsy leadership to create truly lasting change in our enterprise in education. We cannot indulge ourselves in the cynical discontent of the age. We have to be better than that, believing each day that we actually can make progress.

Of all the issues we face right now, the “killer app” is college cost. All other concerns seem to pale by comparison. I was at a fancy dinner the other night in Washington with some top women executives that surely have household incomes ten times or more that of my students at Trinity. Yet, these CEO’s with large paychecks and larger options packages could do nothing but complain bitterly about the tuition prices at their kids’ colleges, many of whom are at elite public universities. While we read a lot about the threat to access posed by the tuition price spiral, in fact, Trinity and some universities like us --- small, private, often religiously affiliated institutions --- are often educating the poorest of the poor in our cities while the flagship state universities enroll increasingly wealthy students. Some of us have learned how to keep higher education accessible and affordable for low income students, but we surely cannot keep meeting that need alone. Absent a somewhat profound institutional commitment to control costs --- including salaries and amenities --- the tuition price spiral takes its inevitable course, particularly in schools that equate excellence with “stuff” (truth be told, because the complaining parents and students also like “stuff,” as do the rating agencies and ranking editors.) We must get a grip on prices and expenses.

Even as we do more to control our prices and to demonstrate the clear outcomes of our work, we presidents must also exert much stronger leadership in asserting and defending the independence of higher education and our real purpose in advanced intellectual attainment, research and scholarship. We are not high schools; we are not trade schools. While we may gather and present data about the employment patterns of our graduates, and this may be particularly important for our professional programs to do, we must insist that the ultimate purpose and worth of higher education does not boil down to jobs as the only or the most important metric of our success.

We must insist that the real outcomes of higher education can only be measured in the passionate stewardship of the intellectual and social freedom that is essential for democracy to thrive --- that’s our job! --- and in the nurturing of the creative genius that makes continuing innovation possible across all fields of human endeavor; in the careful cultivation of those habits of mind and philosophies of the soul that give advanced learning its power to shape succeeding generations of citizen leaders with the intellectual acuity and moral fortitude to lead this often fractious nation, its institutions and communities forward toward that good society of our best hopes.

In this moment, let us hear and respond to the challenge of real leadership that the late Yale President [Bart Giamatti](http://yalepress.yale.edu/reviews.asp?isbn=9780300121872) issued so long ago:

*“Leadership...is an essentially moral act, not --- as in most management --- an essentially protective act. It is the assertion of a vision, not simply the exercise of a style: the moral courage to assert a vision of the institution in the future and the intellectual energy to persuade the community or the culture of the wisdom and validity of the vision. It is to make the vision practicable, and compelling.”[[4]](#footnote-4)*

Higher education’s future depends on our ability to do exactly that.

1. Judith Eaton, “Accreditation’s Accidental Transformation,” [www.insidehighered.com](http://www.insidehighered.com), July 20, 2010. [↑](#footnote-ref-1)
2. Cicero bemoaning the climate of the times in his [First Oration Against Cataline](http://www.gutenberg.org/files/24967/24967-h/24967-h.htm#notes_sec2). [↑](#footnote-ref-2)
3. Don Quixote girding for one last battle, from the [Man of La Mancha](http://www.ficml.org/jemimap/voy/filk/originals3.html) script. [↑](#footnote-ref-3)
4. A. Bartlett Giamatti, president of Yale University 1978-1986, in [A Free and Ordered Space: The Real World of the University](http://www.amazon.com/Free-Ordered-Space-World-University/dp/0393306712) (New York: Norton, 1990) [↑](#footnote-ref-4)