



INNOVATION

*Beyond The Horizon and the
Future of Higher Education*





About the **AUTHORS**

The Higher Learning Commission's (HLC) strategic plan, Beyond the Horizon 2020, promised to form a think tank that cut across multiple sectors to guide HLC on emerging topics in higher education.

One initiative, partially funded by a grant from the Lumina Foundation, was the development of HLC's Partners for Transformation. It is a think tank comprised of representatives from the higher education industry that are focused on innovation. This group met repeatedly in the last two years and identified three main areas of potential innovation for the future of higher education:

- Student-Focused Accrediting Agencies
- Revolution of Postsecondary Education: The Unbundling
- Relationship to the Triad and Beyond

HLC thanks the Partners for Transformation, listed below, for their work to help HLC foster innovation in higher education.

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About the Higher Learning Commission: The Higher Learning Commission (hlcommission.org) accredits approximately 1,000 colleges and universities that have a home base in one of 19 states that stretch from West Virginia to Arizona. HLC is a private, nonprofit regional accrediting agency. HLC's mission is to assure and advance the quality of higher learning.

About Lumina Foundation: Lumina Foundation is an independent, private foundation committed to increasing the proportion of Americans with high-quality degrees, certificates and other credentials to 60 percent by 2025. Lumina's outcomes-based approach focuses on helping to design and build an equitable, accessible, responsive and accountable higher education system while fostering a national sense of urgency for action to achieve Goal 2025.



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BACKGROUND

By Karen Solomon, Vice President for Accreditation Relations and Director of the Standard Pathway, HLC

In the mid-1890s, American education was shifting. Public schools, instead of private institutions, were becoming the norm. Colleges and universities were developing with clearly defined formal structures instead of the more informally organized liberal arts colleges. Curriculum was being designed to meet the needs of students. While some found the changes led to improvements in education, others found the entire system in chaos.¹ On March 29, 1895, the foundation for this accrediting agency was established. At the centennial in 1995 it was noted that “one major theme has been the continuing need to confront change... the goal was to maintain the organization’s relevance and effectiveness by keeping up with the continually developing state of education thought and practice” (p. 370). Fast forward to today, and conversations about change and chaos continue.

In 2015, HLC was developing its strategic plan, *Beyond the Horizon*, and outlining key initiatives for the five strategic directions referred to as VISTA (Value to Members, Innovation, Student Success, Thought Leadership, and Advocacy). The expansion of dual enrollment, emergence of alternative educational providers, creation of new forms of credentials and the growing emphasis on student completion were indicators that the agency needed to reconsider how to evaluate quality while supporting the evolving higher education system. During that time, HLC entered into discussions with Lumina Foundation about the changing nature of higher education and the need to re-examine the role of accrediting agencies in the future.

Once the plan was complete, HLC identified specific goals that could potentially be supported by Lumina. An application was submitted in summer 2016 with a request for funds to identify new, innovative accreditation processes for the evolving credentialing ecosystem that would increase quality and completion. HLC was awarded a \$500,000 grant to pursue programming to cultivate industry-leading practices within the higher education accreditation

process. The multi-year initiative focused on student success and innovation in higher education.

While the recommendations presented in this compendium are relevant to the near future, HLC is known for this type of experimentation. In the mid-1920s, the Committee on Experimental Units was formed to encourage testing and publication of the results to encourage new administrative and curricular changes.² This compendium represents the final set of recommendations resulting from the grant work and focuses on innovation for the Higher Learning Commission.

STUDENT SUCCESS INITIATIVES

After two years of effort, HLC has heightened insight into student success by working with participants to set a framework. More than 55 people were involved in the effort to develop and test variables and measures for evaluating student success outcomes.

A Testing Student Success Data group completed a quantitative study to test select variables designed to help answer the question, “Why do students not succeed?” A white paper offers HLC’s membership the findings and recommendations. A Defining Student

1 Newman, M. (1996). *Agency of Change: One hundred years of the North Central Association of Colleges and Schools*. Kirksville, MO: Thomas Jefferson University Press.
2 Geiger, L.G. (1970). *Voluntary Accreditation: A History of the North Central Association 1945-1970*. Menasha, WI: George Banta Company.

Success group developed exploratory topic papers proposing to shift the conversation regarding the focus on student success and also to explore ways HLC might expect institutions to disaggregate student populations in order to demonstrate levels and trends of student success over time. In addition, the group developed a glossary recommending definitions to assist peer reviewers and institutions in their efforts to assess institutional performance with an emphasis on student retention, persistence and completion. These proposals are available at hlcommission.org/student-success.

INNOVATION INITIATIVES

Working to create an innovation infrastructure, HLC created an Innovation Zone group comprised of college and university representatives who have been actively engaged in the HLC substantive change process to develop recommendations institutions to respond to new fields of student and new modalities in a timely manner. They proposed an expedited substantive change review process and the development of an experimental framework in order for institutions to test, study and learn about emerging practices that provide more students the opportunity to earn credentials. These proposals are available at hlcommission.org/innovation.

PARTNERS FOR TRANSFORMATION

The following papers represents innovative ideas regarding how HLC operates as an accrediting agency. A think tank, Partners for Transformation, was convened and is an incubator for emerging practices to enhance the value of institutional accreditation. Institutional leaders and creative minds from across the higher education industry have worked to picture the future of postsecondary education. The group was challenged to work toward a “transformation” of accreditation, not to merely “tweak” what was already in place. Two exploratory topic papers on “Student-Focused Accrediting Agencies” and “Revolution of Postsecondary Education: The Unbundling” offer a distinct new view of the issues to be addressed by an accreditation agency functioning in the 21st century. The third paper, “Relationship to the Triad and Beyond,” calls for a reorientation of the roles various organizations provide as oversight to higher education in this transformative structure.

These papers will serve as background while HLC works to build its next strategic plan on the eve of agency’s 125th anniversary. Please take time to read the papers and offer your ideas as, together, HLC’s community strives to define higher education that will meet the demands of the emerging technological industry and global marketplace, as well as provide lifelong educational opportunities for learners.



INTRODUCTION

By Maggi Murdock and David Wendler

Higher education is in the midst of a revolution: institutions, processes, providers, delivery and financing models, student demographics, and even societal and political perceptions of the value of higher education are, and have been, changing rapidly. These changes impact not just institutions of higher education, but accreditation processes as well, and they require intense self-reflection, analysis and action. As it has across its history, HLC takes this revolution seriously, understands the need for change and seeks to transform the role of accreditation as higher education evolves into the future.

The HLC 2020 strategic plan, *Beyond the Horizon*³ called for the agency to work as a thought leader and to support sustainable innovation in a focused effort to look beyond the current higher education horizon. As part of its efforts, HLC, with support from Lumina Foundation, established the Partners for Transformation (Partners), a group of educational leaders from across the spectrum of postsecondary learning.

The Partners have spent more than a year analyzing the changes in higher education, recognizing that changes continue to occur over time and accreditation agencies must also change to remain relevant. The foundational perspective of the Partners' discussion is the recognition that dramatic change is needed to address the higher education revolution, requiring accreditation that is student-focused, rather than solely institution-focused, in order to create an awareness of barriers that may limit students' ability to achieve their educational goals. Common threads of the Partners' discussion include the need for better understanding of the real value of higher education, transparency in all aspects of higher education, and a collaborative approach to the assessment of the competencies of learners in order to ensure portability of student outcomes. The Partners recognize that the transformation of accrediting agencies, the Triad and other postsecondary education partnerships will be critical in order to impact the change needed.

FUTURE FOCUS

In their quest to move postsecondary education accreditation effectively into the future, the Partners have considered big picture options. That is, what can be done to effect change, what change is likely and what change should occur?

The possible: what could be done to effect change. Change will require all partners in higher education accreditation to collaborate in order to develop clear standards for learning, develop agreement on essential learning outcomes and how these outcomes are demonstrated and evaluated, and facilitate collaboration across institutions and other providers. Through such collaboration, the language of both institutions and accreditation agencies can become more student-centric; institutions can collaborate to make efficient use of resources; and institutional and programmatic accrediting agencies, as well as federal and state agencies, can align their standards and processes, based in an agreement on outcomes and their measures. Alignment is necessary to reduce the time to candidacy for emerging institutions and providers, and allow for pilot programs of experiments and innovation that might include personal learner accounts (transportable, accredited recognition of learning across institutions and other providers that embraces a variety of learning from a variety of providers across the country). Even the development

³ *Beyond the Horizon: The 2020 Strategic Plan*, identified five strategic directions that affirm HLC's mission of **servicing the common good by assuring and advancing the quality of higher learning**: **V**alue to Members, **I**nnovation, **S**tudent Success, **T**hought Leadership, and **A**dvocacy. For the full plan, see https://download.hlcommission.org/BeyondtheHorizon-StrategicPlan_2016_INF.pdf.

of a two-year National Service program that enhances the common good through citizenship development and the maturation of students prior to entry into postsecondary education could be developed.

The probable: what is likely to be done to effect change. As in all things, what could be done and what is likely to occur as a result of change within higher education accreditation may differ. It is likely that higher education, along with its accrediting agencies, will become more student-centered, with an emphasis on learning and outcomes as students engage in lifelong learning to meet the needs of a changing society. More “just-in-time” learning will emerge through non-traditional means, challenging institutions and accrediting agencies to recognize and embrace both credit and non-credit learning in a global, integrated system of learning outcomes that can be measured and assessed, as well as valued socially and politically. It is also likely that collaboration among the institutional members of the HLC will increase, a result of preference or of necessity in a time of scarce resources. In much the same way, it is likely that more coordination among accrediting agencies will occur, driven by the need to understand what is really relevant in learning and, thus, metrics that will measure outcomes rather than demographics.

The change to higher education is ongoing; challenges exist and will need to be addressed. These challenges include clearly defining the roles of faculty, tenure, academic freedom and intellectual property; balancing the uniqueness of institutions with the need to focus on student learning across providers; attending to the current lack of support for learning innovations; strengthening the leadership from institutional presidents and boards; and recognizing the power of politics, regulation and subsidies that impact higher education and accreditation.

What is preferable: what should occur. Understanding what could occur and what is likely to occur, the Partners also considered what they thought should occur. Preferences included the need for a clear exploration of assumptions about higher education and the value of learning, and better information for decision-making at all levels and in all sectors that affect postsecondary education. Student-centric higher education should be the norm, with an explicit emphasis on quality. The preference would also lean toward an acceptance of a pluralistic system of delivery models that fulfill public and private roles and missions.

The testing of new models must occur. There will be successes and failures, but consideration of students must be a priority during this time, as at all times. Specific preferences for what should occur include a change in perspective about pilot projects to promote innovation in learning: pilots should be considered an investment and not a cost in the allocation of resources. Accreditation agencies can foster this alternative perspective through partnership with the U.S. Department of Education (USDE), perhaps in the format of experimental projects, allowing providers to experiment without fear of penalty.

Increased education for boards, institutional leaders and governmental agencies about the value of postsecondary education should be encouraged as “the right thing” for learners. All involved must recognize the need for immediacy in changes by encouraging nimble and engaged activity and decision making.

Accrediting agencies and institutions of higher education will have to choose to recognize the re-engineering of higher education either as an obstacle or as an opportunity, understanding that success follows risk and the default to tradition is not a viable option. Much like the landscape of education at the time of the initial HLC meetings more than 120 years ago, the need for focused innovative change is a necessity.

CONCLUSION

After the Partners’ initial meeting in 2017, the group was divided into three subcommittees, focusing on broad areas of the higher education change:

- Student-Focused Accrediting Agencies
- Revolution of Postsecondary Education: The Unbundling
- Relationship to the Triad and Beyond

Each subcommittee was tasked with developing a thought paper with a focus on the future of higher education. The thought papers, presented here, are available for review and consideration by the HLC stakeholders. The Partners encourage response to the issues that are raised in each paper as we work to develop a formal proposal to submit to the HLC Board of Trustees and staff for consideration. Send responses to partners@hlcommission.org.



STUDENT-FOCUSED Accrediting Agencies

*By Sylvia Jenkins, Chris Bustamante, Terry Hartle, Lynda Milne,
Maggi Murdock, Larry Skogen, Jeanie Webb and David Wendler*

INTRODUCTION HLC's Partners for Transformation Subcommittee on Student-Focused Accrediting Agencies was tasked with understanding how accrediting agencies might conceive, design and enact a shift toward becoming more student-focused, and to describe how HLC can provide leadership for such change. Analyzing ways to develop a framework for a radically transformed higher education accreditation system that is primarily student-focused led the subcommittee to define two overarching goals: (1) demystifying higher education and accreditation for students and for those who support students, the public and policy makers; and (2) fostering and formally certifying postsecondary educational quality by rigorously evaluating the education offered and demonstrated by colleges, universities and other providers.

BACKGROUND

Postsecondary learners have been changing for decades: no longer are these learners primarily fresh high school graduates who are first-time, full-time freshman seeking their associate's or baccalaureate degree through a single institution in a two- or four-year period of time. Increasingly, learners feel the necessity of educating themselves across a lifetime of work and civic engagement, as society and the economy require them to do. In this changed environment, both degree and non-degree learning is valued: training and education are increasingly perceived as complementary and not exclusive. To meet the demands of different learners, the providers of postsecondary education have also been changing, with many different kinds of providers in addition to traditional community colleges, colleges and universities. However, while accrediting agencies increasingly consider the welfare of students in their decision making, their standards and criteria for accreditation are focused largely on the evaluation of traditional postsecondary institutions and not on students and their learning goals. Non-traditional providers of postsecondary education are usually not members of accrediting agencies and are therefore not reviewed and accredited by regional accreditors.

Changing student demographics and student goals; vastly different postsecondary providers, rapidly developing learning technologies, and the evolving social, political and economic systems demand a radically different kind of higher education accreditation. It is clear that this accreditation should be primarily student-focused in order to be effective across time, geography, providers and technologies.

LEADING THOUGHTS AND OPPORTUNITIES

What does accreditation look like when it is enabling, empowering and visionary, but also deeply practical—all on behalf of students? Can accreditors be the calculated, purposeful risk-takers necessary to be the first voice, rather than the last, when change is essential? How can HLC provide leadership as accreditation becomes more student-centered and relevant?

HLC could be the first voice when crafting policy statements that recognize students as their primary constituents. HLC is committed to taking a road less traveled as it fundamentally rethinks what quality control and accreditation look like from a student-centered focus, defining what reliable data are and how institutions can track the learning

outcomes defined both by students themselves and by the common good.

How can HLC provide the leadership necessary to meet the challenges of change? This subcommittee identified a two-pronged goal for HLC as it transforms itself into a student-centered accrediting agency: (1) demystifying higher education and accreditation and (2) fostering and formally certifying postsecondary educational quality.

To demystify higher education and accreditation for students, those who support students, the public and policy makers, HLC should provide simple, but relevant, information that defines what accreditation does and why it is important for each individual student's educational decision making. HLC should explain clearly what students should seek from institutions and other providers as they initiate and progress through their lifelong learning journeys. In addition, HLC should be the guarantor of quality; guarantor that academic offerings fit the purpose of the students' educational intents. HLC standards for quality should be defined clearly and simply, and those standards must be applied across the variety of providers that will serve students throughout their lives of learning.

HLC, like other accrediting agencies, should also be an advocate. It should advocate for effective and efficient student learning opportunities within the interconnected ecosystem of learning. All learning opportunities, not just traditional academic institutions of higher education, should be included in this advocacy. A future-oriented, student-focused accrediting agency should advocate for the recognition of a wider variety of providers and help to define how these providers integrate into a system of lifelong learning beyond secondary education. At this precipice of a credential revolution, accreditors need to shift long-held viewpoints of a degree as the only path to success.

The role of advocate for HLC and other accrediting agencies also includes encouraging strong social and political support for higher education (defined as learning across a lifetime) at the local, state and national level. Finally, HLC and other accrediting agencies should advocate for drastic and effective changes in the measurement metrics of student success in order to fully recognize the fundamentally

altered postsecondary learning environment that produces both citizens and workers in society.

To foster and formally certify postsecondary educational quality, HLC should rigorously evaluate the education offered and demonstrated by colleges, universities and other member providers. HLC should also develop accreditation principles, values, criteria and processes that require, and then measure, how effectively institutions are guiding students in their individual, varied educational journeys. The primary evidence of quality should always be student outcomes—the outcomes sought by students and declared as their goals, and the outcomes offered and assessed by providers. In all of its operations and commitments, HLC and its members should set forth and emulate models of institutional excellence. Examples in other domains include the Mayo Clinic, whose effective patient-centered care, processes, operations and insistence on quality and innovation result in pre-eminence in its field. Another example for emulation is the Cleveland Clinic, where care is provided by “an integrated group, with each function supporting every other function... . Coordination, standardization, quality improvement, [are essential to making] high quality products and services available to more people more cheaply...”⁴

HLC should promote this goal of fostering and certifying postsecondary educational quality in a variety of ways:

HLC should develop messages and processes that speak directly to students, rather than only communicating through institutions. For example, HLC should encourage, or even require, institutions to develop web-based guidance for students to help them navigate their way through their institution(s) so they can identify and reach their learning goals (e.g., Are you a returning student with credits from multiple institutions, or do you have work or military experience that might be applied as credit to a degree program? If so, contact X in Institution Y). If this web-based guidance were standardized, students with credits from multiple institutions would find the process simpler. HLC should develop its own web-based guidance to aid students in finding the right information and support within each student's institution(s).

⁴ See Toby Cosgrove, M.D., *The Cleveland Clinic Way: Lessons in Excellence from One of the World's Leading Healthcare Organizations*, McGraw-Hill Education, 2014, p. 3

A student-focused learning ecosystem should be founded upon the perspective of the accumulation of learning across a lifetime, rather than upon one certificate or degree program. Such a student-focused learning ecosystem should include the possibility of students having individual learning accounts, e.g., MyLearning (like MyPatient or MyHealth accounts), that document learning of every kind. Likewise, institutions should develop processes to organize, recognize and value such varied learning in appropriate ways. In such a student-focused system, students who can document learning through any provider in HLC's network should have their learning recognized and validated by any other HLC-accredited provider.

HLC, in partnership with other accrediting agencies, should define, develop and implement an advocacy program at the institutional, local, state and national levels that clearly and effectively communicates why higher education, including continuing, lifelong learning, is critical to the economy and the nation. It should develop accreditation principles, values, criteria and processes that (1) reduce the competition for resources among institutions and increase incentives for collaboration and sharing of resources within and across institutions to support learners and (2) require effective and efficient transfer of credits and recognition/acceptance of learning from a variety of sources.

In addition to the foregoing, three intriguing ideas are proposed by this subcommittee:

1. Enhance Recognition and Valuation of Learning

Might HLC consider non-traditional postsecondary learning providers as members? Might HLC more closely collaborate with specialized accreditors? And might HLC develop reciprocity agreements with other regional accreditors to recognize accredited learning across regional accrediting agencies, akin to the WICHE SARA and Interstate Passport programs?⁵ In this radically altered postsecondary learning ecosystem, innovative ways should be found to recognize and value students' learning across a variety of platforms, modalities and locations as they pursue learning across their lifetimes.

2. Provide Title IV Funding Directly to Students

If Title IV funding went directly to the student rather than the institution, would this help address the revolution in higher education and

make accreditation more student-focused? Such a process might entail a deposit into a "learning account" that would be available to the student to pay for accredited learning opportunities and might include a work requirement. Perhaps a reduction in institutional financial aid bureaucracy might help reduce the costs in the present system. HLC might encourage collaboration among institutions and states to build an equivalency network of courses and credentials where the Title IV monies could be used, which would provide a granularity that is not currently within the capacity of HLC. Another option could be to allow students to use this money as they see fit, by taking it to a traditional institution, an employer-sponsored set of courses, a learning camp or other non-credit type of learning that fits the students' learning goals. Developing accountability measures will be critical to the success of such a process of funding. To avoid the problems that have arisen historically with financial aid defaults by students, some proportion of funding could be awarded for completion—of a competency, a degree component, a certificate, and/or a degree.

- ### **3. A National Service Requirement**
- How might HLC encourage the development of a two-year national service requirement that takes place after a student finishes secondary education and before a student enters college or university? How might HLC support research that documents that such a national service requirement will enhance, rather than diminish, the learning experience of students, the effectiveness of learning providers, and the strengthening of the social, political and economic systems?

Lingering Questions

This subcommittee has some lingering questions that they pose to HLC and other accrediting agencies as these agencies consider how they will adapt to the revolution in postsecondary education:

1. Does the current membership structure of HLC and other regional accreditors ensure that they will always be more institution-focused rather than student-focused?
2. How could HLC and other accrediting agencies ensure that the students' courses, credits and

⁵ See <http://nc-sara.org> for more information about the National Council for State Authorization Reciprocity Agreements.

certifications always transfer across institutions and regions?

3. How might alternative providers of education, training and skills become members of HLC—or should accrediting agencies have standards that ultimately expand the ways through which students obtain recognition/credit for these forms of learning? In short, how might the quality of offerings of third-party providers be assured?
4. How can HLC provide the leadership for the cultural shift necessary for policy makers, institutions and society to recognize and value the fundamental change in postsecondary student demographics and learning processes?
5. If HLC does make the change to become student-centered, what would be evidence of its success? What would the reinvented HLC and its processes look like?
6. How can HLC and other accrediting agencies encourage the development of federal and state requirements and regulations that recognize and value a student-centered, lifelong learning ecosystem?

CONCLUSION

Student-focused accreditation broadens the space for accreditors. While accreditors should be bold during this revolution in postsecondary education, they should not throw out everything that is familiar, or it will only create confusion. Accreditors need to keep enough that seems familiar, even though it may work in a different way. Change in the policies, criteria and standards of HLC and other accrediting agencies will create change within postsecondary institutions and among other providers of postsecondary learning. However, all innovations, policies or processes that are crafted to address change will require accreditors like HLC to always ask: Are these innovations effective for students and their learning?

SOME RESOURCES TO CONSIDER

- Chapman, Bruce, “A Bad Idea Whose Time is Past: The Case Against Universal Service,” *Brookings Review*, Vol. 20, Fall 2002, pp. 10-13 (2002).
- Cosgrove, Toby, M.D. *The Cleveland Clinic Way: Lessons in Excellence from One of the World’s Leading Healthcare Organizations*, McGraw-Hill Education, 2014.
- Dionne, E.J., Drogosz, Kayla Meltzer, Litan, Robert E., *United We Serve: National Service and the Future of Citizenship*. Washington, D.C., Brookings Institution Press, 2003.
- Galston, William A, “The AmeriCorps Experiment and the Future of National Service.” Washington, D.C., Progressive Policy Institute, 2008.
- Hall, Joshua, “Higher-Education Accreditation Market Regulation or Government Regulation?” *The Independent Review*, Vol. 17, Issue 2, Fall 2012.
- Hall, Joshua. *The Efficacy of Regional Accreditation Compared to Direct Public Regulation of Postsecondary Institutions in the United States*. Ph.D. Dissertation, University of Southern California Rossier School of Education, 2012.
- Korb, Lawrence J., “Time to bring back the draft?” *The American Enterprise Online*, December 21, 2001.
- Krey, Patrick, “Any Volunteers for National Service?” *New American*, Vol. 25, February 2, 2009.
- Sawhill, I.V., “It’s Time to Make National Service a University Commitment,” *Brookings Institutional Press*, 2017.



The Revolution of Postsecondary Education **THE UNBUNDLING**

*By Rufus Glasper, Don Betz, Cheryl Johnson-Odim, Arthur Levine,
Mark Milliron, Timothy Slottow and Burck Smith*

INTRODUCTION The next revolution in higher education is here as the industry navigates what Vaill conceptualized decades ago as “turbulence, this permanent white water of modern organizations.”⁶ The analogy of white water remains true today, with technology, shifting demographics and the advent of a global, digital, information economy driving change faster and more pervasively than ever before. The question posed in this paper is what does this “environment of continual newness”⁷ and the unbundling of educational programs and services mean for accreditation now and post-revolution?

The drivers of the revolution of postsecondary education are well known,⁸ and accreditation has evolved as variables of change have entered academe. At the center of the current, almost urgent need for accreditation to hasten its evolution is the reality that credentialing in higher education is diminishing as the coin of the realm as institutions, curricula, employees and employers adapt to the new reality of the knowledge economy. The purpose of accreditation began as quality assurance and later expanded to include gatekeeper of federal funding⁹ when as a result of the 1965 Higher Education Act “Congress expanded accreditors’ role by entrusting them with ensuring academic quality of the educational institutions at which federal student aid funds may be used subject to oversight by the federal government through the recognition process.”¹⁰

This paper suggests that policymakers, educational leaders and interested stakeholders broadly consider accreditation adaptation both

horizontally—anticipating a recalibration of the accreditor/federal relationship—as well as vertically—between the accreditor and the accredited¹¹—and add probing questions to spur discussion and new ways of thinking. These recommendations are made in the context of deconstructing, or unbundling, significant aspects of the current academic revolution as they relate to accreditation. These aspects include, for example, expanding innovation, increasing personalization, and new micro and macro models of higher education aimed at meeting more diverse learning needs.

BACKGROUND

Fueled by an economy transitioning from agrarian to factory to knowledge work, population change, and a fluctuating volume of taxpayer subsidies, enrollment at accredited colleges grew from just under 6 million in 1965 to just over 20 million in 2015.¹² During this remarkable 50-year expansion, accreditation served

6 Peter Vaill, 1996, *Learning as a Way of Being: Strategies for Survival in a World of Permanent White Water*. San Francisco, CA: Jossey-Bass., p. xiv.

7 Vaill

8 Michael Bassis, *A Primer on the Transformation of Higher Education in America*, July 2015; Michael M. Crow & William B. Dabars, *Designing the New American University*, 2015; Adrianna Kezar, *How Colleges Change*, 2013; Richard Susskind and Daniel Susskind, *The Future of the Professions: How Technology Will Transform the Work of Human Experts*, 2015

9 Higher Education Accreditation Concepts and Proposals. Senate Committee on Health, Education, Labor & Pensions. <https://www.help.senate.gov/imo/media/Accreditation.pdf>

10 https://www2.ed.gov/admins/finaid/accred/accreditation_pg2.html#U.S.

11 Robert Dickeson, CHEA report “Recalibrating the Accreditation-Federal Relationship, January 27, 2009. Washington, D.C.

12 <https://www.statista.com/statistics/183995/us-college-enrollment-and-projections-in-public-and-private-institutions/>

as the guarantor of quality and the gateway to student financial aid. Until recently, there were few postsecondary education models available other than the two- and four-year, 60 and 120 credit units for degrees. The standard educational model required a fixed location and a co-located community of credentialed experts and students. Accreditation created standards that judged the quality of facilities and the credentials of the experts.

However, in the current environment accredited colleges and universities are being buffeted by a confluence of forces that include new technologies, globalization, a consumer orientation that unbundles and fragments the market, declining financial and public support, and the long list of variables that are fueling an academic revolution. Though the demand for knowledge workers continues to grow, current accreditation standards and processes are not adapting quickly enough to support educational innovation that comes with market changes. Without adapting standards to include new educational models and providers, taxpayer subsidies cannot be extended to forms that are clearly desired by students.

As membership organizations dedicated to helping their members improve, accreditors are vested in the maintenance and adaptation of the college model that has been so successful for so long. As a de facto regulator, accreditors are compelled to embrace new models of education delivery, so the best and most effective education is available to consumers and the marketplace. This raises more questions than answers: How can membership interests be balanced with new models? Can legacy standards of quality be applied to new models? Should they be? What is in the best interest of the student? What is in the best interest of the taxpayer? What is in the best interest of the employer? What is the best interest of society?

Accreditation's original purpose was to standardize the Wild West nature of higher education as it moved into the Industrial Age. During that time, the stages of change were similar to those being experienced now: frequently recurring cycles of major criticism, rejection of that criticism, broad-scale experimentation, best-practice models, and diffusion of models across higher education. For example, courses and the Carnegie credit unit served to standardize practice, and a new organization called accreditation was developed. Now, amid cries for

innovation and for quicker decisions, accrediting agencies need to set modern standards for quality, rejecting bright lines in favor of common-sense standards that allow innovations to improve or expand learning options.

The continuing revolution in higher education forces reconsideration of the overall definition of postsecondary education and recognition of colleges and universities as a subset in its larger context. If higher education is to remain vital during this time of profound change, the industry should acknowledge and respond to the many forces it faces as well as opportunities and venues for innovation. It is time for accreditation to redefine itself. The following discussions are posed to stimulate thought about approaches for accreditation to adapt itself to this academic revolution.

MARKET SHIFTS IMPACTING HIGHER EDUCATION

Technology and New Providers

The internet has changed how information and expertise is accessed and shared. Technology-enabled global economics, politics and cultures are impacting higher education institutions and promise to reshape teaching and learning, student recruitment and retention, and educational labor. "Technology is providing access to free-range, organized information: people can create pathways to learning, either on their own or through third-party non-profits or companies... [and] new technological advancements have given us the capacity to recognize and capture learning whenever and wherever it happens..."¹³ Susskind and Susskind (2015), in a review of technology's transformation of the professions, reaffirm the shift in how expertise has been produced and distributed:

More people signed up for Harvard's online courses in a single year, for example, than have attended the actual university in its 377 years of existence. In the same spirit, there are a greater number of unique visits each month to the WebMD network, a collection of health websites, than to all the doctors working in the United States. In the legal world, three times as many disagreements each year amongst eBay traders are resolved using 'online dispute resolution' than there are lawsuits filed in the entire U.S. court system.¹⁴

13 The Silent Learning Revolution in Higher Education.

14 Richard Susskind and Daniel Susskind, *The Future of the Professions: How Technology Will Transform the Work of Human Experts*, 2015, p. 1.

With many more options available to them, students are better able to access educational choices that match their needs and their price points. Nationally and globally, there is a need for re-skilling and up-skilling, both types of training that can be and are offered by alternative providers. Many of the new providers have built business models and learning/curriculum options outside of accreditation and without taxpayer subsidies. They often address more discrete learning needs that would traditionally be integrated into a larger degree program (e.g., coding academies teaching core competencies in a specific programming language). Others offer the delivery of single or a handful of courses rather than a full 60 or 120 credits, sometimes bundled into certifications or badges. Some of these programs are built on subscription models rather than fixed-price structures and offer competency-based assessment and advancement (e.g., all-you-can-learn offerings that allow students to progress at their own pace over a period of time). These providers are responding to market demands for just-in-time education, such as “needing to know a foreign language by Thursday,” and for options to purchase education when it meets consumer price and demand points.

Online delivery has enabled non-accredited providers to provide education in different increments, with different pricing models, staffing models and ways of evaluating success. Accreditation was built to evaluate credential-granting offerings, not to evaluate quality across a market with as many permutations as are present in today’s higher education market.

As new providers offering different price and program structures gain credibility, the distinction between their structures and traditional education has become more apparent. The following four factors serve as examples that illustrate this distinction:

- **List Price.** Some companies are able to offer prices for online courses that are lower because these companies do not need to subsidize other parts of their organization.
- **Risk.** Some providers offer courses on a subscription basis or charge after completion. Such pricing structures dramatically reduce the pricing risk of taking courses and starting degrees.
- **Term.** Boot camps like General Assembly or Flatiron School serve the function of some graduate programs, but in a more compressed time frame.

- **Faculty.** In some contexts, the faculty role has shifted to that of a mentor who supports the student learning experience as needed. In other contexts, such as boot camps, the focus is on relevant industry experience more than traditional faculty qualifications. In both cases, the criteria for functional expertise has changed.

The questions to be asked given the pace of technological change and new entrants to the higher education marketplace include: How quickly are new entrants entering the market and in what numbers? How can accrediting agencies and the accreditation process stay abreast of and support quality innovation and experimentation? How can the process be less bureaucratic and time-consuming, while retaining quality standards?

Granularity

Granularity reflects the unit of education being offered and focuses on modular programs rather than the required two-year or four-year degree. Alternative providers are already filling the role of providing modules of postsecondary education (e.g., coding camps). Some employers have created their own just-in-time education, which is giving value to badges and credentials. In education, examples of granularity are not mutually exclusive, i.e., they often stack into each other, and can include the following:

- **Degrees.** Associate’s, bachelor’s, and graduate degrees.
- **Credit Hours.** Time accumulations that can be assembled into associate’s and bachelor’s programs.
- **Competencies.** The set of skills being promised and assessed.
- **Experiences.** An educational experience that can be defined and mapped into a curricular pathway, such as a music concert, a political speech or a trip.

While it is tempting to assume that the college student is an adept consumer who rationally calculates price, granularity and value, that is not the case for all students. Many are entangled with other concerns or motivations that do not fit neatly within this set of assumptions. Calculability, cost and value may not be the prime factors for undergraduate students when making decisions about college. Granularity drives questions related to whether accrediting agencies can and should more broadly define curriculum, program and degree, as well as

the term “credential”: What about the readiness of accounting systems to support alternative measures of learning, defined competencies and effects on financial aid?

Faculty Roles

Faculty roles are changing, as are models of faculty work. Part-time and non-tenure track faculty are by far the new majority (70 percent)¹⁵, but despite this reality, the full-time faculty tenure discussions often grab the headlines. Different delivery methods require different development, instruction and assessment strategies. Traditional roles of grading and advising can be assumed by specialized educators. Instructional designers may take primary responsibility for developing curriculum; however, this increasingly occurs using technology that enables faculty-driven course development. Faculty may be given course templates complete with content, activities and assessments. These changes can be the result of specialization, scale, cost, location, partnerships or a combination of factors.

A system driven by market demand and an increased level of business involvement in the creation of curriculum is an advancing reality, but important messaging to the public about the value of faculty or mentors filling that role remains essential. Success in the workplace and community requires more than content acquisition, and, for students who need to develop the skills and ethos, a new normal for the role of faculty is necessary, one which includes beyond-disciplinary development for students. What, if any, is the role of the new majority of faculty—part-time, non-tenure track—in accreditation redesign? Should there be a range of standards for learning? Once standards are established, what is the role of faculty?

The best of full-time faculty has long been expansive in their openness to allowing for new models to emerge, where those models can serve well. It is inaccurate to say all tenured faculty are resistant to change and will no longer be in demand. Indeed, some traditional universities and colleges may not see the roles of their faculty change much. This is not a “better than” argument. It is, however, a “better with” one. Higher education is better with more flexibility and inclusiveness in the emerging educational models, including the roles of faculty

and related educational professionals. The industry may be moving from a more traditional general-practitioner view of faculty to one with generalists and specialists, much like the world of health care. If higher education is going in this direction, then what is the role of part-time, non-tenure track, or more specialized faculty in accreditation redesign? With more diverse and specialized faculty roles, how does the industry ensure these roles are included in developing education standards? How will academic freedom be addressed?

Shared Services

Increasingly, institutions are outsourcing services. Support services, student services and curriculum may be purchased from for-profit or nonprofit entities. The role of accreditation may be to help define the lines of demarcation, so lines are not crossed and student needs are appropriately met. In a review of Sundararajan’s “The Sharing Economy,” Davies asks readers to think about when “the sharing economy comes to campus,”¹⁶ and a future where the lines between the “market economy and social reciprocity” become more blurred (e.g. Uber, Airbnb) as a result of new information-sharing platforms and providers. For instance, “when a car is constantly shifting identity among consumer good, capital asset, rental service, and community asset, the main challenge lies with the regulator grappling with this new fluidity.” This same could be said for postsecondary accreditation, emerging partners and institution/campus services relationships. When education shape shifts, shared services models create new questions, such as: What are the potential conflicts of outsourcing and how are they mitigated? Should providing student services be an expectation of colleges and universities, or should these services be provided by others?

FOCAL POINTS FOR RECONCEPTUALIZING ACCREDITATION

Price

Until recently, prospective students wanting to use education to improve their employability had few choices other than a two- or four-year degree from an accredited college or university. With demand high and per-student state subsidies decreasing, college-going costs—and student debt—rose rapidly. The result is over \$1.44 trillion in student debt and a 10.8 percent student default rate. One aspect of a student

15 Adrianna Kezar & Daniel Maxey, *Adapting by Design: Creating Faculty Roles and Defining Faculty Work to Ensure an Intentional Future for Colleges and Universities*, 2015.

16 William Davies, “The Sharing Economy Comes to Campus”, in *The Chronicle of Higher Education*, February 3, 2017, p. B14

choosing to enroll in a college is the buying decision. For this facet of the decision, the student, like any consumer, seeks the best value. Value can be defined by the combination of the price paid and the return received. Unlike other consumer markets, identifying price and return is more complex in higher education (see also “Why Can’t a College Be More Like a Firm?” by Gordon Winston¹⁷). The return to a college degree might not be apparent for years into the future, and, when apparent, might be attributable to other factors. Because of the difficulty of assessing return and the nation’s desire to subsidize higher education, accreditation was given the responsibility of judging quality, one aspect of which is a proxy for anticipated return. Institutions that meet accreditation’s quality standards, and their students, are then eligible to receive taxpayer subsidies.

Value

Value may determine the fit between the student and the traditional or alternative provider. Accreditors will need to clarify their role regarding alternative providers and will need to define value and quality in the context of the various provider models. Different models fit diverse student needs.

The value of a credential, especially one that is publicly funded, is an issue that needs clear metrics for quality assurance, outcomes and other relevant factors, particularly since these values are reassessed, negotiated, and reaffirmed or replaced in every generation. There are certainly advantages to the current state of modular programming—granularity—of colleges and universities. The Student Transformative Learning Record is one example of an initiative that adds value by adding to the current state of credentials. As the universe of alternative credentials continues expanding—digital badges, micro-credentials, MOOC certificates, nanodegrees, etc.—how will students and employers rectify the value proposition question?

Students may enter and exit their education over a period of time, so they are likely to value transferable and stackable credentials that result in an escalating certification or degree. Answering price, granularity and value questions for accredited higher education through the quality assurance measurement process, particularly with the growth of online learning, has become difficult. What role, if any, will accreditation agencies have in the inevitable shifts in credentialing and educational value?

Quality

About one billion texts are sent every day, 15.2 million every minute, and this doesn’t include app-to-app messaging. Texting is a simpler form of communication than email, and its thumb-driven typing yields short messages filled with acronyms and emojis. And yet, texting filled the niche for short notes and communication in a way that email could not. Likewise, rentable urban scooters are low-quality transportation. There’s room for only one rider, no cargo space, limited range, limited speed, no cover from rain, and more. However, when integrated with other transportation options, it nicely fills a consumer need for convenient, affordable, short-haul transportation. If communication or transportation regulators prohibited low-quality providers, then new business models and technologies that filled needs better than existing providers would never have been allowed. Accreditation is faced with a similar conundrum today. How does accreditation judge quality when the market for education is expanding to include a much wider variety of technologies, business models, and providers? Should it?

What if the postal system was given the authority to require stamps for email? Or, if taxi drivers were responsible for regulating ride-sharing and scooter programs? Would these tech-inspired business models have ever entered the market? As a membership organization that is also responsible for providing access to taxpayer subsidies, accreditation is faced with a similar dilemma. This is even more complicated in postsecondary education than in other markets undergoing change because colleges and universities are heavily subsidized. Further, they are large employers across the country with political power and active stakeholders supporting preservation of regulatory structures just as they are, despite the unsustainability of student debt and the promise offered by new models.

Rather than trying to define and enforce a quality experience, the better question for a regulatory agency in a vastly expanded marketplace is: How can bad outcomes be prevented? This enables accreditation to layer new consumer protection structures on top of the existing regulatory infrastructure, or in some cases replace them. For instance, accreditation could focus on the degree to which students are at financial risk when signing up for an education program, pricing clarity for

17 <https://sites.williams.edu/wpehe/files/2011/06/DP-42.pdf>

educational offerings, and alignment between a college's financial incentives and a student's investment in education. In short, as the education market becomes more populated and diverse, accreditation's role should be to ensure that the market functions properly rather than to define quality in such a way that taxpayer subsidies flow only to certain business models.

Defining Learning: Credit Hour, Competencies, Outcomes, Experiences, Transferability

In this information economy, higher education needs to focus on outcomes and competencies, raising questions regarding who will decide the outcomes, how they are assessed, and the accreditor's role in these processes. Some wonder if the fundamental standards are already too low, while others think the concept of such a base is not well defined or useful. Some politicians believe brightlines are needed while others find them too restrictive. Those arguing against bright-line approaches see the many models from which students can choose and rely on the market to determine outcomes and competencies. With outcomes, the focus is no longer on what students are taught; it is on what they have learned. It is a student-centered approach. By identifying what really matters, the accreditation approval process should speed up for both existing institutions and new providers.

A growing number of stakeholders are placing more emphasis on technically driven and job-specific education, yet the value of the traditional educational experience has not diminished. If students feel they do not need or cannot afford a degree, they now have other options. Some students may want smaller pieces of curriculum that meet their needs at the time. Even in traditional degree programs, students will begin to ask for acknowledgement of parts of courses such as taking quarters of a course in different timeframes. When education is delivered in granular form, coherence and quality may become issues. However, they may be advanced, as the connections to curricular and programmatic paths can be made clearer. The same is true for transferability.

Diverse models and smaller modules within higher education bring forth again, and in different ways, the questions accrediting agencies have asked via the peer review process for decades: How is learning measured? How might competencies be defined through off-campus stakeholders, such as foundations, government, employers and professional associations, that have an interest in outcomes?

While compelling, an outcomes approach begs new questions, such as: Who decides the outcomes? How are they assessed? How do students access subsidies in advance of undertaking a program to achieve these outcomes? How can accreditors convene and work with stakeholders to establish shared definitions of competencies? The responses to these and similar questions point to revolutionary change in a higher education system that was not designed to create revolutionary change.

Reauthorization of the Higher Education Act

What happens with the Higher Education Act is important. Decreasing federal guidelines, allowing experimentation and eliminating the credit hour are under discussion. The inevitability of outcomes eventually replacing the credit hour, with time and process becoming variables, has been asserted. The Diagnostic and Statistical Manual in psychiatry and the healthcare industry's experience may provide models for determination of competency. It is likely this change will not come from within institutions, but rather from external stakeholders. Entities that played a role in the industrial revolution of higher education could again play a role in this change. These entities include professional agencies, accreditation agencies, foundations, government and employers. This will require a new accreditation system based on outcomes and their assessment and will require buy-in from the political class.

RECOMMENDATIONS

The changing nature of the student population, new technology-infused delivery models, and the just-in-time training and education needs for employees are the basis for considering an evolution to a market- and outcomes-based subsidy and regulatory structure. Clearly, time and price influence students' decisions about whether to take the risk of earning a postsecondary education credential. Moreover, with new alternatives, more students may not want or need a two- or four-year degree, may not want or need the full campus-life experience, and may be looking for a shorter and more compact experience at the best price. The following recommendations are presented against this backdrop.

Promote Innovation and Institutional Change

Promoting innovation and providing thought leadership that supports innovation are strategies accrediting agencies can use to remain vital during this time of profound change. There is a need to allow

institutions to experiment and to fail, perhaps like the U.S. Department of Education's Experimental Sites Initiative. Institutions cannot transform themselves overnight. For HLC, the questions become: How do accreditors help existing institutions get there, and how do accreditors apply this to new institutions and bring them in? With many drivers of change competing in the higher education ecosystem, how is the typical college or university positioned to react and lead? How do colleges and universities change and innovate while adapting to the broader context at the accreditation level? If accreditation agencies embrace even the most basic innovative ideas, how will institutions and people within those social systems respond?

Define Quality

To be effective in the future, accreditation must ensure quality is properly defined, the appropriate outcomes are measured, and institutions are held accountable. However, this must be done in a way that distinguishes quality differences among different institutions, and there must be a mechanism that allows the accreditation process to be flexible enough to change as the world, technology and labor markets change. One challenge is to maintain and enforce quality standards for the current models while enabling new definitions of quality to empower new education models. Ensuring consistent application of quality standards can help institutions improve societal outcomes, internal practices, relevant credentials and involvement in innovation. For example, establishing a uniform set of reporting criteria could inform reporting of key metrics on student success.

Define Outcomes

HLC should be a champion for outcomes-based education and a leader in defining the outcomes that all providers should meet. Defining outcomes is only part of the equation, however. HLC should also provide clear expectations for processes that assess achievement of learning outcomes. HLC should convene stakeholders to launch this initiative to create common definitions of competencies and common methods of assessing their achievement. This should be conducted within a framework that allows for diverse input from diverse constituencies and for input to be weighed against externally required standards that can be used to influence institutions and the federal government.

Support New Financial Models

HLC should support increasing not only student access to college, but also choice among postsecondary options, and it should support increased student financial aid as well as institutional accountability with regard to price. With just-in-time education across a student's lifespan on the rise, HLC should advocate for student funding for lifelong learning and lifetime transcripts of competencies.

Develop Alternative Accreditation Models

The one-size-fits-all, time-based model of higher education is badly out of date. Today, opportunities to reimagine and reinvent higher education are essential. Leading higher education into the future, accreditors should be champions for innovation and invention. This requires making the approval processes quick and nimble to accommodate the speed with which innovation is occurring. Alternative models should also focus on a small number of essential criteria and should apply to current and new institutions. Conducting a thorough assessment of the value of the various reports and other requirements could lead to streamlining the accreditation and reporting processes while strengthening and sharpening the focus on quality. Development of alternative models should include stakeholders such as the U.S. Department of Education to generate support for innovation pilots that allow for failure without punishment and with opportunities for revision and refinement stemming from lessons learned.

Thrive in the Revolution

A revolution is happening in education, so HLC should develop a timeline for progressing through it—or for taking a leadership role in shaping it—to include steps to be taken now, in 3–5 years and in the longer term. HLC should explore options for necessary funding to support these strategic efforts. If funding comes from external sources, HLC will need to determine how to maintain its independence when using external dollars. HLC will also need to review its capacity to continue, or whether and how to revise, its current responsibilities in light of the new compendium of thoughts and ideas. The dual role of accreditation to maintain minimal standards and promote high goals for continuous improvement and innovation leads to further questions: Should these roles be coupled in a single process or split into different processes? Will HLC need to determine whether it should be a standards-based regulator, or something else? How should HLC be measured? Should it be

measured on its contributions to the nation's deficits in educational opportunities for those who seek socioeconomic mobility?

For today's colleges, the role of accreditation is reasonably clear. Accreditation agencies review and certify that the organizational structure of a college and its offerings conform, within reason, to historical models of a college and its program offerings. With limited diversity of price and granularity, colleges can be judged principally on inputs and intra-institutional outcomes. However, with increasingly diverse permutations of price and granularity available among new providers, such oversight seems unworkable. Instead, some have proposed that all providers be judged on outcomes rather than inputs. In other words, establish outcomes and competencies that are valued and let the market decide what fits which students best.

CONCLUSION: BALANCING TRADITION AND CHANGE

With the advent of federal financial aid, accreditation's role was to define higher education's granularity such that federal financial aid could be conferred to desiring students. When instituted, there were few alternatives to the degree, which still serves as a proxy for competencies and is the product of credit hours and experiences. Since then, market and technological changes have combined to allow students to unbundle the degree. Many adult students are interested in the degree but not the experience of traditional higher education. Employers might be interested in competencies rather than degrees. High school students seeking to lower the price of higher education by shortening their experience are interested in credits without experiences. However, because federal financial aid is tied to accreditation and accreditation recognizes only certificate- and degree-granting institutions, increasingly this

demand is being fulfilled by alternative providers and employers themselves. The public is losing trust in the ability of accredited higher education to meet obvious student and workforce demand. Indeed, "colleges and universities of all kinds are struggling to compete effectively and continue to serve the public's needs and maintain its confidence."¹⁸

Regional accreditors are increasingly aware that they operate in high-velocity environments. Striking a balance between time-honored traditions and strategic accommodation of high-velocity environments is a challenging task. Creating multiple points of accreditation or review, focusing on outcomes, and replicating models like the Experimental Sites Initiative may be promising options for accreditation to explore. Questions and reflection about processes and structure are worthwhile, both at the institution level and at the level of accreditors.

The ideas expressed in this paper point to the very foundational concepts of why education exists. The reality is that this question is answered differently by various stakeholders. The value of education is ultimately determined by society and the trust society places in the systems. With regards to outcomes, there is a balance between broad system outcomes and individual outcomes. Sometimes they are aligned, other times they are not. A student returning to school to earn a set number of credits in pursuit of a professional certification has a very different definition of success than a student who is seeking a bachelor's degree. The defining of outcomes and goals is contextual. Accreditors are likely uniquely positioned to help redefine the outcomes process and systems by which these outcomes are measured. The ideas expressed in this paper are central to discussions that will only become more central to the future of education and learning.

¹⁸ <http://www.oecd.org/site/eduimhe08/41218043.pdf>



RELATIONSHIP TO THE TRIAD and Beyond

By William Tammone, Stephanie Davidson, Robert McMahan,
Elizabeth Sibolski, Robert Stein and David Wissmann

INTRODUCTION From the perspective of the U.S. Department of Education, the American postsecondary education system is relatively autonomous:

“

In the United States, institutions of higher education are permitted to operate with considerable autonomy. The United States has no Ministry of Education or other centralized federal authority exercising control over the quality of postsecondary educational institutions, and the states assume varying degrees of control over education. As a consequence, American educational institutions can vary widely in the character and quality of their programs.¹⁹

From the perspective of many working within the postsecondary academic community, however, higher education is a highly regulated industry. The operations of most, if not all, postsecondary institutions are overseen by an assortment of organizations that vary in number and authority across the states.

1. Autonomous institutional governing boards

Institutional governing boards are charged with, among other things, ensuring that institutions operate with integrity and serve the public good. In some instances, a single board has authority for multiple campuses. Ideally, institutional governing boards are expected to operate at a policy level, delegating the everyday operations of an institution to its president. In some cases, the board of two- and four-year public institutions are elected. In other situations, the governor of the state in which the institution operates appoints the board members. And in private institutions, the members of the board are often nominated, recruited, or chosen by

current board members. Corporations or other business partnerships often run for-profit institutions.

The Association of Governing Boards identifies major fiduciary responsibilities associated with institutional governing boards, including acting responsibly and in good faith on behalf of an institution's interests and ensuring that the institution operates legally within the scope of its governing documents. Further detail about these major responsibilities of governing boards can be found at <https://www.agb.org/briefs/fiduciary-duties>.

2. State governing boards, coordinating boards, and/or regulatory agencies

A variety of organizational entities may be involved, depending on each state's legal framework, to do statewide planning and require institutional accountability with a goal of fostering an effective, efficient, quality statewide higher education system. Many

¹⁹ "Accreditation in the United States," U.S. Department of Education, <https://www2.ed.gov/admins/finaid/accred/accreditation.html>

states have multiple and/or overlapping layers of regulatory oversight that include several departments of state government, e.g., economic development and elementary/secondary education. The extent to which both public and private institutions are included in oversight also varies across states, depending on the particular policy and/or program in question, e.g., new program approvals, substantive program changes, eligibility for state student financial aid, dual credit programs, transfer policies, workforce development initiatives and many others. Some institutions, such as tribal colleges, are also overseen by their sovereign nations.

3. State licensing agencies

Programs in several practicing professions, e.g., nursing, education, lab technicians, social work, counseling, massage therapy, architecture, and many others must meet standards set by state licensing boards.

4. Accreditors

According to the Council for Higher Education Accreditation (CHEA),²⁰ accreditors are “private nongovernmental organizations created for the specific purpose of reviewing higher education institutions and programs for quality.” Colleges and universities, as well as specialized programs within them, can be accredited. “Recognized” accreditors are those that have been vetted by CHEA, the U.S. Department of Education or both.

a. Institutional Accreditors

Institutions as a whole are accredited by regional or national accreditors. There are seven recognized regional accreditors and 12 recognized national accreditors.²¹ Institutional accreditation is a voluntary, independent, peer review process that serves two major purposes: to ensure that all aspects of an institution meet standards established for quality higher education and to promote continuous improvement of quality.²²

b. Specialized/Programmatic Accreditors

Programs, departments or schools within colleges and universities can hold specialized or programmatic accreditation. There are

approximately 60 recognized specialized/programmatic accreditors in the United States.²³ In general, this type of accreditation also involves a peer review process to ensure a particular program or collection of programs in a department or college meet standards established independently by the profession and also to promote continuous improvement of quality. In some professions, graduating from a program that has specialized/programmatic accreditation is required to obtain a license to practice. For other disciplines, specialized accreditation is voluntary.

5. Agencies of the federal government

The federal government’s role in oversight of higher education is driven by regulations associated with federal dollars that flow to colleges and universities along with mandates to promote federal interests. In addition to the U.S. Department of Education, there are other federal departments that have direct relationships with postsecondary institutions that receive federal funds. Guidance for the work of the U.S. Department of Education comes from federal regulations, many of which are outlined in the Higher Education Act, which is regularly reauthorized through negotiated rulemaking and ultimately legislative actions.

6. Other external stakeholders

Employers, program advisory committees and other external stakeholders can also have a significant influence on higher education. This influence can affect not only what programs a college or university offers, but also the length and curricular content of those programs.

It is important to note that regardless of whether an institution is public, private not-for-profit (including faith-based) or for-profit, the number of oversight agencies and extent of regulation may differ slightly but remains substantial.

At the institutional level, as opposed to the program level, the three primary regulators are the U.S. Department of Education, state government agencies and the institutional accrediting agencies (regional or national accrediting agencies). Collectively, these

20 <https://www.chea.org/about-accreditation#who>

21 <https://www.chea.org/about-accreditation#who>

22 <https://www.c-rac.org/copy-of-about-accreditation>

23 <https://www.chea.org/about-accreditation#who>

three entities are known as the Triad. An institution eligible to receive federal financial aid for its students is subject to oversight by the Triad. As previously noted, there are many regulatory agencies beyond the Triad, and which of these agencies a college or university must work with will vary.

Questions

- What role does, or should, HLC play in a state and federal climate of actual and potential regulatory change? What are the potential conflicts between the HLC mission and these changes? How does HLC mitigate these potential conflicts?
- What role does, or should, HLC play in a climate of actual and potential regulatory change by specialized accreditors? What are the potential conflicts between the HLC mission and these changes? How does HLC mitigate these potential conflicts?
- How well are the roles of the Triad communicated to HLC institutions? How can HLC better communicate its role (and its limitations) to a continual influx of new students, parents, institutional leaders, and other stakeholders?

HLC INTERACTIONS WITH FEDERAL, STATE AND SPECIALIZED REGULATORS

HLC interacts with the federal government frequently and on a variety of issues, but primarily regarding federal student aid responsibilities and legislation that might affect accreditation. HLC assures that institutions meet their Title IV student financial aid responsibilities and responds to U.S. Department of Education requests for information on accredited institutions. HLC follows up on referrals of complainants from the U.S. Department of Education staff. HLC must apply for U.S. Department of Education recognition as a higher education quality assurance entity every five years through the National Advisory Committee on Institutional Quality & Integrity (NACIQI).

HLC leadership engages in meetings and advocacy on points of policy as they might affect accreditation. This advocacy currently includes a voice during the negotiated rulemaking process. There are also some ad hoc inquiries or courtesy communications from Homeland Security, Justice, Veterans Affairs or others related to accredited institutions. Direct interaction with U.S. Senators and Members of Congress or their legislative staff is primarily associated with the

House Committee on Education and the Workforce. HLC, along with the other regional accreditors via the Council of Regional Accrediting Commissions (C-RAC), employs professional advocates in Washington, D.C.

Regular interactions occur with representatives from HLC and representatives of state agencies/ organizations from its 19-state region at the annual meeting of State Higher Education Executive Officers (SHEEO). HLC communicates accreditation information with state agencies, state authorization is a prerequisite for HLC accreditation, and HLC considers the actions of states in its reviews. HLC works with the states to partner on conducting joint visits with the goal of streamlining the accreditation/regulatory process for institutions.

HLC interactions with specialized accreditors include exchanging communications regarding changes in accreditation statuses.

Questions

- How well are the roles of the Triad communicated to institutions?
- How can HLC better communicate its role (and its limitations) to a continual influx of new students, parents, institutional leaders and other stakeholders?
- What role does, or should, HLC play in a climate of actual and potential regulatory change by the U.S. Department of Education, by state agencies, by specialized accreditors?
- How does HLC mitigate any potential conflicts with regulatory changes?

DRIVING FORCES, RESTRAINING FORCES AND CONTEXT

Externally, one of the most common criticisms of higher education is that the current system of oversight does not result in guarantees of educational quality. In some cases, consumers believe they are at risk of losing time and money in their pursuit of higher education, and many employers, legislators and other stakeholders state dissatisfaction with the knowledge, skills and abilities of recent college graduates. To further complicate the issue, there are new providers of higher education, which raises the question of accrediting agencies' role in oversight.

Internally, while most in higher education recognize the necessity of and some value in the oversight and regulation, four concerns are commonly expressed:

1. Inconsistent standards of quality

One example that surfaced in recent years would be the differing faculty credentialing requirements as they apply to instructors teaching dual credit/dual enrollment/concurrent enrollment courses (the terms vary by state) in high schools, where students are simultaneously earning high school and college credits. This can be particularly controversial when the courses involved are transferable general education courses in fields such as English, math and history, which could count toward the fulfillment of requirements for bachelor's degrees as well as associate's degrees.

Many state agencies are satisfied when the instructors teaching such courses are certified to teach these subjects at the secondary level and have a master's degree in education. However, regional accrediting agencies such as HLC, are not. HLC has long maintained that all faculty (including part-time faculty and faculty teaching at off-campus locations such as high schools) have a master's degree in the field they are teaching or a master's degree in some other field, but with at least 18 graduate credit hours in the field they are teaching.

Specialized accrediting agencies can also have standards for faculty qualifications that differ from HLC's. A case in point would be the Joint Review Committee on Education in Radiologic Technology (JRCERT). JRCERT requires full-time didactic faculty to have, at a minimum, a bachelor's degree. A bachelor's degree would also meet HLC's faculty credentialing requirement, if the courses were part of an associate of applied science degree program. A bachelor's degree would not be sufficient for a faculty member teaching in a bachelor's degree program. This also can be problematic in contractual arrangements between universities and hospital-based radiological technology programs that lead to the awarding of a bachelor's degree, since such arrangements must be approved by HLC.

Another example that recently surfaced was the emergence of "3+3" Juris Doctorate (JD) programs. These programs are allowable under the U.S. Department of Education's definition of a "doctor's degree-professional practice,"

the American Bar Association's standards and many state bar requirements, yet they require "double counting" 30 semester hours for the undergraduate degree and the professional degree—something that is not routinely allowed by regional accreditors and some states. The proliferation of professional doctoral degrees, as well as efforts to improve college affordability, are likely to result in increased efforts to streamline programs where possible while maintaining the integrity and quality of degrees.

2. Redundancy or duplication of effort

Many institutions have to prepare for multiple accreditation visits a year and/or submit multiple required annual reports to institutional and specialized accrediting agencies, state boards and agencies, and the federal government. In many cases, these institutions are responding to the same questions and providing the same or very similar data.

3. Burdensome cost

Individually, the regulatory agencies, particularly the specialized/programmatic accrediting agencies, have only a limited impact on the resources of the institutions of higher education. However, when considered collectively, the cost of such oversight can be significant. Not only do institutions have to pay annual fees to maintain their institutional and specialized programmatic accreditation, but they also have to pay the expenses associated with accreditation-related visits and reports. In fact, the workload associated with accreditation-related reporting and preparation for site visits is so great that many institutions now have to dedicate at least one full-time employee to handle these responsibilities. Additional costs are incurred due to the personnel and technology expenses related to maintaining institutional research offices. Thus, the costs associated with the regulation of higher education can be measured in technical and human resources, as well as financial resources.

4. Inconsistent Definitions for the Same Metric

When requesting data from institutions of higher education, the various oversight agencies sometimes use the same terms, but define those terms differently.

Questions

In addition to duplication of effort and burdensome costs, what other consequences (both positive and negative) do institutions face with separate regional and specialized accreditation visits? How can HLC processes be changed to maximize positive consequences while mitigating negative impact?

LEADING THOUGHTS AND OPPORTUNITIES

The Partners for Transformation Triad and Beyond Subcommittee sees opportunities for addressing these issues that require enhanced communication and collaboration among the major oversight agencies.

1. Enhanced communication and collaboration between the regional accreditors and the states within their regions should be used to address the concerns about inconsistent minimum standards for quality, duplication of effort and burdensome cost.

Differences in standards could be addressed by having regional accreditors, along with each of the states with the regions, come together to uncover areas of inconsistency and, where found, determine how best to address those inconsistencies. Including the SHEEO professional association in conversations about opportunities for greater collaboration between the states and regional accreditors would add value in identifying new opportunities. One of the challenges is the degree of variability in governing structures across states, with some having multiple entities (sometimes with overlapping responsibilities) and, in other cases, having no centralized governing structure.

A reduction of the cost and redundancy related to separate reviews by the state agencies and regional accreditors could be accomplished if the regional accreditors and state agencies would agree to joint reviews, where information is shared and site visits are coordinated. Ongoing efforts by the Ohio Department of Higher Education and HLC have demonstrated that reviews and decisions can remain independent while reducing the burden on colleges and universities.

The use of different measurement definitions for the same metric results in conflicting and confusing information about student and institutional performance and makes comparative

analysis difficult, if not inappropriate. HLC would benefit from exploration with SHEEOs or their staff in identifying key metrics that involve oversight agencies using different measurement definitions for the same factor.

2. Enhanced communication and collaboration between the regional accreditors and the specialized/programmatic accreditors should also be used to address the concerns about inconsistent minimum standards for quality, duplication of effort and burdensome cost.

More engaged conversation between regional and specialized/programmatic accreditors would help to identify areas of mutual concern and interest, along with the extent of alignment in the standards to which institutions are held accountable.
3. Enhanced and transparent communication with the U.S. Department of Education. While the leadership of the U.S. Department of Education changes with different administrations, it is critically important to engage key staff in discussions with the states and accreditors. HLC holds annual fall meetings with states within the HLC region; inviting a U.S. Department of Education representative to attend would be extremely helpful in advancing the engagement within the Triad. The federal agenda can change with new leadership at the U.S. Department of Education and its effects on the Higher Education Act reauthorization. It will be helpful to develop a shared understanding of all federal issues between HLC and the states.
4. Enhanced and transparent communication between the institutional accreditors themselves. More engaged conversations among the regional and national institutional accreditors would help to identify areas of mutual concern and interest, particularly in those areas where the standards established by specialized/programmatic accrediting agencies cross regional boundaries.

RECOMMENDATIONS

Pilot Project 1: Special Convening With SHEEOs From the HLC Region

HLC has a long tradition of convening meetings with representatives from SHEEO agencies from within the HLC region twice a year. In the early years, several SHEEOs were directly involved, but over time many

states have sent chief academic officers or persons in other staff positions to represent their agencies. In addition, a representative from the National SHEEO office is often in attendance, along with some representation from the Midwest Higher Education Compact. These meetings provide important opportunities for information sharing concerning policy updates and new initiatives by accreditors, states and the federal government, along with other topics of mutual concern involving oversight of postsecondary institutions and the promotion of continuous quality improvement.

While these meetings should continue, there would be value in holding a special convening for SHEEOs from HLC states with the president of HLC and some HLC Board members. Objectives for this convening should include:

- Design a joint statement clarifying similarities and differences between HLC and state SHEEO agencies in specific oversight roles associated with quality assurance and consumer protection.
- Identify quality criteria embraced by both SHEEOs and HLC, e.g., faculty qualifications, program length, general education requirements, transfer of credits, treatment of prior learning, treatment of digital badges and other micro-credentials.
- In areas of overlapping responsibilities, determine which of the quality criteria staff from the SHEEO agencies and HLC should work collaboratively to develop agreed-upon standards.
- Develop a prioritized list of other agreed-upon projects for staff from HLC and SHEEO agencies from the 19 HLC states to work on collaboratively.
- Integrate the U.S. Department of Education into any relevant discussion and decision making.

The imprimatur of HLC leadership and state SHEEOs on specific action-oriented projects would help to ensure ongoing persistent work for systemic change within the region, such as the other recommendations made in this compendium. In addition, another outcome from in-depth conversations of this nature would be an enriched understanding by both institutional accreditors and state agencies of the separate demands that are placed on institutions of higher education.

Pilot Project 2: Focused Conversations Between HLC and One or More Specialized/Programmatic Accreditors

The minimum standards of quality established by institutional accrediting agencies can differ from the minimum standards established by specialized program accreditors. In Pilot Project 2, HLC should engage in focused conversations with certain specialized program accrediting agencies, such as the Joint Review Committee on Education in Radiologic Technology (JRCERT), in an attempt to reach consensus on minimum qualifications expected of faculty teaching in programs leading to college degrees (associate's and bachelor's degrees). Related to this, these discussions would also focus on whether the courses and programs accredited by JRCERT require levels of performance by students appropriate to lower division or upper division undergraduate coursework. At the present time, some institutions of higher education regard JRCERT-accredited radiologic technology coursework as upper division coursework that satisfies the "major" requirements for bachelor's degrees, while others treat it as lower division coursework that only satisfies the requirements of an associate's degree.

Pilot Project 3: Joint Visits

HLC should identify one or two interested specialized accreditors to explore the potential of integrating oversight activities with the goal of reducing unnecessary redundancy of effort and burdensome cost experienced by institutions. Experimentation could serve as a proof of concept for expansion to other partnerships.

Ideally, HLC would eventually work with all interested specialized accrediting agencies to coordinate the timing of accreditation site visits. This might take the form of "joint visits," with a visiting team made up of members from both agencies or improved coordination of separate visits, with the goal of reduced institutional impact on financial and human resources. A separate area within this project would involve exploration of duplication in regular reports and paper reviews, such as substantive change requests, submitted to each agency.

Pilot Project 4: Summit on Professional Doctoral Degrees

State and regional accreditor standards for doctoral programs have been in place for many years and likely reflect expectations for research degrees such as the

Ph.D. Over the past several years, there has been a proliferation of professional doctoral degrees. Although the programs that offer these degrees are often approved by specialized/programmatic accreditors and allowed by the U.S. Department of Education, there has not been a concomitant examination of minimum standards and expectations by states and regional accreditors, resulting in conflicting messages to colleges and universities.

In Pilot Project 4, HLC should bring together the relevant stakeholders (state agencies, specialized/programmatic accreditors, the Council of Graduate Schools and the U.S. Department of Education) for a Summit on Professional Doctoral Degrees. Topics to be addressed could include, but not be limited to, program length, faculty qualifications and integration with bachelor's degrees.

Pilot Project 5: Shared, Web-Based Reporting Mechanism

HLC should work with state agencies and interested specialized accreditors to develop a shared, web-based reporting mechanism for data of common interest. Agreed-upon institutional data could be entered into these web-based databases and accessed by the cooperating specialized accreditors as well as the states, HLC and the U.S. Department of Education.

Another aspect of this project could involve HLC and state agencies engaging in conversations, especially about inconsistent data definitions, with representatives from the Data Quality Campaign (DQC), which is a nonprofit organization committed to working with states to improve their educational data systems. While K-12 data systems have been of primary interest, attention has also involved a focus on states' integrated P-20 data systems, making meaningful longitudinal analyses possible. More information on the Data Quality Campaign is available at dataqualitycampaign.org.

Pilot Project 6: Collaboration Between HLC and One of the Other Regional Accrediting Agencies

The Council of Regional Accrediting Commissions (C-RAC) is a collective of seven regional accrediting bodies responsible for the accreditation of approximately 3,000 of the nation's colleges and universities. While regional accreditors in the United States vary in size, scope of activities and particular processes used to ensure quality higher education standards and to promote continuous quality

improvement, C-RAC provides regional accreditors with opportunities for information sharing, for collectively issuing joint statements to influence public policy and for engaging in collaborative efforts to study an issue in depth and release a report, e.g., the recent C-RAC Graduation Rate Information Project Report.²⁴

In addition to sharing information with its C-RAC colleagues about initiatives that result from the Partners in Transformation report, HLC should work with one or more of the other regional accrediting agencies with the intent of identifying an additional collaborative project.

Two possible projects include:

1. Expansion of the initial proof of concept work with specialized accreditors to include at least two regional accreditors at the front end, especially since the specialized accrediting agencies often have oversight over programs throughout the country.
2. Design of a centralized web portal with current information about the public policy environment for each state within a specialized accreditor's region. Such a resource would be extremely useful to peer reviewers making site visits.

The current NCHEMS resource on state governance structures (<http://nchems.org/projects/postsecondary-search>) which HLC uses and shares with accreditation teams, is a good first step, but falls short by containing only limited information, some of which is out-of-date. Other organizations often issue a report about each state's public policy environment on a specific topic, e.g., Education Commission of the States report on Dual Credit Programs. These types of resources often lose their impact over time, unless there is ongoing responsibility to keep such a report updated on a regular basis.

Designing the content for such a web portal would be arduous at first but could include several partners in providing initial content, with state SHEEO agencies having ultimate responsibility for the portal's content. As a public portal, states would be motivated to keep the information both accurate and current.

A comprehensive resource of this nature could include information on state regulations and

²⁴ https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4c07fc8660dd9.pdf

guidelines covering key issues affecting quality, including, but not limited to: faculty qualifications for teaching college-level work, concurrent enrollment (dual credit) programs, transfer of academic credit across institutions, performance funding, shared governance, general education requirements, competency-based education programs and residency requirement.

Should any or all of these pilot projects seem promising, the regional accreditors, state agencies and/or willing specialized program accreditors will also need approval and encouragement from the U.S. Department of Education if these changes are going to be scaled to a national level. Sovereign nations and national institutional accrediting agencies would also be encouraged to participate in these collaborative initiatives.

Questions

The goal of this relationship is to maintain the autonomy and purpose of members of the Triad and of specialized accreditors, while at the same time providing a seamless, efficient system of assuring and encouraging quality in higher education.

- Should the U.S. Department of Education, the states, and national, regional, and specialized accreditors agree on terminology and definitions (e.g. assessment of student learning, student success) so institutions need only one response to a requirement rather than different versions for the same concept?

- Should accreditation and regulatory standards be standardized so that institutions complete one report instead of multiple reports?
- Should one review/visit suffice for all accreditors and regulators?
- Should a nationalized/ integrated data-tracking system be used so that student credits transfer across regions?
- Should the College Scorecard and IPEDS be improved or another data-tracking measure be created to gain more complete measures of student success? Should some of the U.S. Department of Education's regulations be relaxed so that accreditors might champion institutions' innovations?
- Should the U.S. Department of Education, the states and accreditors join together and speak with one voice in advocating for higher education, especially during the revision of the Higher Education Act?

The answers to these questions will require moving beyond cooperation and coordination to collaboration among the triad and the specialized accreditors. Collaboration should result in new ways of doing things, streamlined oversight efforts, higher quality, agreement on outcomes and better advocacy efforts.



RESPONSE

From Friends of the Partners for Transformation



January 10, 2019

Dear Colleagues,

I am pleased to support the efforts of the Higher Learning Commission's Partners for Transformation. Collectively, this work signals the emergence of a new paradigm for accreditation in American higher education. All of these papers include an important and active recognition that the rapidly changing societal, economic and technological conditions in which universities operate increasingly limit the effectiveness of historic and proven methods of ensuring quality. More importantly, they recognize that with these new conditions come entirely new demands for accrediting agencies. The HLC will have to fundamentally transform and develop entirely new capacities to continue fulfilling its legacy mission with greater efficiency. With this background, I am reminded that the undertakings and impact associated with HLC's Partners for Transformation extend well beyond what is captured in these papers. The implications of this work are broadly relevant to American higher education and should invite mindful reflection on the need for higher learning organizations to develop capacities to perpetually adapt.

My views on these efforts are informed by nearly 30 years of executive leadership in higher education, including my post as Executive Vice Provost at Columbia University and more than 16 years in my position as President of Arizona State University. My experience at ASU is especially relevant to the issue of transformation. ASU is a unique university that aspires to operate at the frontiers of social and technological change and has been able to do so, in part, because of the enabling efforts of the HLC.

From 2002 to today, enrollment at ASU has more than doubled, from about 55,000 to more than 111,000. Currently, more than 38,000 of our students are enrolled in fully online, "digitally immersive" degree programs. In 2002, we had no online learning capacity. In a world where completion of a college degree is associated with profound increases in socioeconomic,

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emotional and physical wellbeing, ASU has awarded more than 120,000 degrees over the past six years, including more than 23,000 in the most recent academic year alone. And since 2002, minority enrollment at ASU has more than doubled.

While aggressively advancing its access mission, ASU has transformed into a national scale research institution. The research enterprise has grown by a factor of four and now accounts for more than \$600 million in annual expenditures. According to data from the National Science Foundation, ASU ranks 8th of 490 in total research expenditures among universities without a medical school—ahead of Caltech, Princeton and Carnegie Mellon. ASU ranked 22nd in terms of NSF-funded expenditures—ahead of Harvard, Duke, and Johns Hopkins—and eighth in NASA-funded expenditures—ahead of Stanford and UCLA. ASU ranked 13th in non-science and engineering disciplines, fourth in the social sciences, and fourth in the humanities. Over the past ten years, ASU has been the fastest growing research university in the nation among all institutions with research enterprises exceeding \$100 million.

These transformational outcomes are animated by a deep institutional commitment to national service and an anticipation of the same massive scale social, economic and technological change that motivates the HLC's Partners for Transformation. They are associated with a number of important prescriptions, which are included explicitly or implicitly in these papers.

The first is a renewed focus on students, as opposed to institutions. By focusing on students as the beneficiary of transformation, individual universities and, more broadly, American higher education will be able to effectively respond to rapid social and economic change. This approach will help higher education stand apart from other industries affected by rapid change. For example, throughout the recent financial crisis, the banking industry (and associated regulatory institutions) experienced an additional crisis of legitimacy as it neglected the needs of consumers in focusing too narrowly on the needs of institutions.

The second general prescription is an expanded focus on measuring and rewarding institutions for serving the communities in which they are embedded. Obviously, this has geographic and demographic implications for a state university. But smaller independent colleges and universities might also serve distributed communities, such as those defined by a profession or any number of background characteristics. Service to a community, however defined, will help insure that transformation is meaningful.

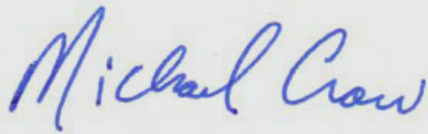
As a final prescription, I am reminded by the HLC's Partners for Transformation that we have entered an era of new institutional designs and new conceptual definitions. Through new institutional designs, universities may develop novel approaches to link knowledge production and learning. This may require rethinking how we define such critical factors such as credits, classrooms, and faculty. The challenge for accreditation agencies is to actively recognize that their role is no longer to standardize, systematize or, worse, preserve the status quo. Instead, the HLC is asked to empower the forms of innovation and new institutional designs that meaningfully service society. Making this challenge exponentially more complex is the

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reality that with innovation comes institutional diversity. To navigate quality assurance in an era of innovation the HLC will have to reduce the compliance burden at many high performing schools. This can be done easily through expanded reporting of student success metrics and targeted (rather than comprehensive) assessments of proven education providers. Proven innovators can also be seen as partners to help the broader higher education ecosystem understand the best approaches to managing change in this complex new world. The work presented here represents both incremental and radical steps towards ensuring that new designs and new approaches come about with student and societal benefits in mind.

Sincerely,

A handwritten signature in blue ink that reads "Michael Crow". The signature is fluid and cursive, with the first letters of "Michael" and "Crow" being capitalized and prominent.

Michael M. Crow
President
Arizona State University

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January 25, 2019

Dr. Barbara Gellman-Danley
President
Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604-1411

Dear Barbara,

Thank you very much for the opportunity to review and respond to the three papers prepared by the HLC's Partners for Transformation subcommittees. As usual, HLC is leading the way in thinking about and planning for the future, even if such thinking and planning force us to confront uncomfortable truths. Clearly, the subcommittees took seriously their charge to think critically and creatively about the future of higher education and the role of accreditation in that future. I applaud you and the subcommittees for giving the rest of us not just food for thought, but a smorgasbord of provocative questions and recommendations about accreditation's future. It is a professional and personal privilege to express my strong support for this work and to offer some related observations.

Student-Focused Accrediting Agencies

Focusing on students is always a good idea. They are, after all, the primary reason we are here and do what we do. After almost four decades as a president of four universities and one university system, I know at least one thing for certain: our students are a source of profound insight and wisdom if only we listen carefully to and engage with them. For too many of our students, however, accreditation is an arcane, distant, nebulous exercise-if they are aware of it at all. This subcommittee wisely recognizes the value of focusing on students as the most significant unit of analysis. I offer the following ideas as two ways institutions can meet HLC halfway in this journey of transformation.

Almost all institutions offer programs and courses intended to help first-year students adjust to college. Should we not include an explanation of the accreditation process in these orientation programs and courses to increase student awareness from their first day on campus and to solicit their input about how accreditation should work in the future? Many institutions offer graduate programs in higher education administration and offer courses on everything from public policy to organizational behavior. But how many of these programs offer courses about accreditation? For the benefit of future higher education administrators and scholars, let's

encourage MA and PhD programs in higher education to develop courses on accreditation as a step toward creating a robust scholarly specialization in this area.

Accreditation's relationship to the "Triad"

This subcommittee has done a great job describing the increasingly complex regulatory environment in which higher education operates. This landscape is dominated by the U.S. Department of Education, state government agencies, and accreditation agencies. With an increase in complexity comes higher stakes, greater costs, and more opportunities for confusion, duplication, and tension. It is in the best interests of every institution to unravel this complexity and promote better communication in support of regional and specialized accreditation as well as public accountability. The subcommittee's six pilot projects recommended are innovative and represent a compelling blueprint for how to accomplish this.

I offer an additional suggestion. Based on my experience toiling in the education policy vineyards, I have found enormous value in working with Governors and Legislators. As the people with their hands on the levers of political and budgetary power, they are indispensable partners in reducing regulatory burdens. Therefore, I suggest that many of these pilot projects would benefit from the direct involvement of gubernatorial and legislative staff. Let's also invite representatives from the National Governors Association, the National Conference of State Legislatures, and the Council of State Governments. These organizations serve vital roles by advising elected officials and diffusing good ideas and policy innovations across state borders. The same is true for education-specific organizations such as the Education Commission of the States and (in West Virginia's case) the Southern Regional Education Board, trusted and respected by elected officials of both parties. Inviting gubernatorial and legislative staff, as well as representatives from the organizations that work closely with them, will amplify the positive effects of our efforts.

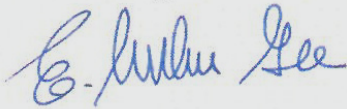
Accreditation thriving in the revolution

Visitors to my office are greeted by a framed quote from General Eric Shinseki: "If you dislike change, you're going to dislike irrelevance even more." Even when change comes in the form of a revolution, with all of the attendant chaos and uncertainty, it is still preferable to irrelevance. Higher education has been not just relevant but essential to America's economic and social progress over the last two centuries. I am particularly proud that public land grant universities, such as West Virginia University and The Ohio State University, have contributed mightily to this cause. Higher education must never become irrelevant—and accreditation offers us a powerful tool to avoid that terrible fate. I appreciate and agree with the subcommittee's recommendations about how accreditation can thrive in the ongoing revolution and avoid irrelevance. The paper made me wonder, however, if reconceptualizing accreditation may require renaming it. Instead of "accreditation," how about "endorsement"? To me, "endorsement" implies a much stronger vote of support than "accreditation." Do we not want to signal to students, parents, government officials, the media, and everyone

else that we are not just accrediting institutions but endorsing them and their quality? What about “commendation”? Do we not want to tell students and parents that we are not just “accrediting” institutions but “commending” them for maintaining access and affordability? Or perhaps “empowerment”? Do we want to say that institutions that work with HLC and go through the process are “accredited,” or would we rather say they are “empowered”? Our names and the words we use to describe our work are important. Maybe now, as we race along with the revolution, is an appropriate time to think about the names of these organizations and the crucial work they do. Maybe Shakespeare was wrong when he wrote, “What’s in a name? That which we call a rose by any other word would smell as sweet.”

Thanks again for allowing me to be a junior partner in transformation with HLC. Guided by your work, I am more optimistic than ever about the future of our enterprise.

Cordially,
E. Gordon Gee

A handwritten signature in blue ink that reads "E. Gordon Gee". The signature is fluid and cursive, with the first name "E." and last name "Gee" clearly legible.

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CONCLUSION and Response From HLC

A Message from HLC's President Barbara Gellman-Danley

As you can see, the papers contained in this compendium offer far-reaching observations and suggestions for the Higher Learning Commission to consider. We asked the Partners for Transformation to think outside the box, or as I often say, “break down the box altogether.” There were no fences put around their ideas; we gave them free range of thinking without limitation. The meeting discussions were very rich and resulted in lively debates and fascinating new lenses through which to see regional accreditation for the future. We set up the think tank recognizing there are so many others weighing in on higher education that there is a clear obligation for HLC to engage in similar provocative conversations. Thank you to the Lumina Foundation for helping to support these initiatives as part of our strategic directions.

It our sincere hope that our members and other stakeholders recognize the integrity of the recommendations as coming from the perspective of national leaders in higher education versus those of us working at the Higher Learning Commission. We weighed in when asked, offered thoughts to consider, then stepped back and listened.

Taken together with the many avenues offered for input, we are in a much better place to move toward an innovative future in higher education accreditation. The HLC Board members and staff are committed to spending time examining each of the papers and their perspectives as we apply continuous improvement to our work, maximizing ways to assure that we are thought leaders in both accreditation and higher education. They are never mutually exclusive.

Our stakeholders matter, with a laser focus on students. These papers are filled with thought-provoking ideas for our member institutions, higher education in general, partners within the Triad, elected officials, Washington, D.C. think tanks and many others. The challenge is to embrace the ideas put forth as key discussion points for deep dives and potential adaptation. Taking a conservative stance as the nation's largest regional accreditor will not serve us well. That is exactly why we wanted to hear from experts, practitioners and members.

The next steps will be to ask the questions listed on the following pages both within HLC and outside. To this end, HLC will be holding stakeholder meetings this fall and invite all readers to provide feedback on these recommendations and the following questions to partners@hlcommission.org.

We are committed to resisting “it can't be done” and replacing it with “what should be done?” To respond will require very thoughtful reviews as we apply new ideas to our work and those of our membership. The intent is not to fall off the edge of a cliff by moving too quickly, but not to be anchored down by the past at the same time. It will be a very interesting and challenging balance.

I want to thank all the members of the Partners for Transformation, the HLC Board and staff who have committed hundreds of hours resulting in the compendium. It is a first step in a dynamic process of self-reflection bridging us toward our next strategic plan, EVOLVE 2025.



Partners for Transformation: Questions

STUDENT-FOCUSED ACCREDITATION PAPER

1. What does accreditation look like when it is enabling, empowering and visionary, but also deeply practical – on behalf of all students?
2. Can accreditors be calculated, purposeful risk-takers necessary to be the first voice, rather than the last, when change is essential?
3. How can HLC provide leadership as accreditation becomes more student-centered and relevant?
4. How can HLC craft policy statements that recognize students as their primary constituents?
5. How can HLC define reliable data and how can institutions track the learning outcomes defined both by students themselves and by the common good?
6. How can HLC provide leadership necessary to meet the challenges of change?
7. How can HLC be the advocate for effective and efficient student learning opportunities with the interconnected ecosystem of learning?
8. How/should HLC advocate for the recognition of a wider variety of providers and help to define how these providers integrate into a system of lifelong learning beyond secondary education?
9. How can HLC and other accrediting agencies advocate for and encourage strong social and political support for higher education?
10. How can HLC and other accrediting agencies advocate for drastic and effective changes in the measurement of metrics and sources?
11. How can HLC evaluate the education offered and demonstrated by its member institutions and other providers, which may become members?
12. How can HLC measure outcomes?
13. How can HLC promote fostering and certifying postsecondary education quality in a variety of ways?
14. How can HLC develop messages and processes that speak directly to students?
15. How can HLC work with institutions to evaluate the accumulation of learning across a lifetime?
16. How can learning be recognized and documented by all providers?
17. How can accreditors advocate the critical importance of higher education to the economy and the nation?
18. How can accreditors assist in resource allocation for collaboration and sharing across institutions to support learners?
19. How can HLC and other accreditors require effective transfer of credits and recognition/ acceptance of learning from a variety of resources?
20. Should HLC consider non-traditional postsecondary learning providers as members?
21. How can HLC work with other specialized accreditors?
22. Might HLC develop reciprocity agreements with other regional accreditors to recognize learning across regions?
23. Should Title IV funding be awarded directly to the student versus the institution?
24. How might HLC encourage the development of a two-year national service requirement that takes place after a student finishes secondary education and before that student enters a college or university?
25. What research can be done to validate that a national service requirement will enhance student learning and the strengthening of the social, political and economic systems?

Lingering Questions

1. Does the current membership structure of HLC and other regional accreditors ensure that they will always be more institution-focused rather than student-focused?
2. How could HLC and other accrediting agencies ensure that the students' courses, credits and certifications always transfer across institutions and regions?
3. How might alternative providers of education, training and skills, become members of HLC – or should accrediting agencies have standards that ultimately expand the ways through which students obtain recognition/credit for these forms of learning? In short, how might the quality of offerings of third-party providers be assured?
4. How can HLC provide the leadership for the cultural shift necessary for policy makers, institutions, and society to recognize and value the fundamental change in postsecondary student demographics and learning processes?
5. If HLC does make the change to become student-centered, what would be the evidence of its success? What would the reinvented HLC and its processes look like?
6. How can HLC and other accrediting agencies encourage the development of federal and state requirements and regulations that recognize and value a student-centered, lifelong learning ecosystem?
7. How can membership interests be balanced with new models?
8. Can legacy standards be applied to new models? Should they be?
9. What is in the best interest of the student? The taxpayer? The employer? Society?
10. How can accrediting agencies set modern standards for quality, rejecting bright lines in favor of common-sense standards that allow innovations to improve or expand learning options?
11. How can the industry of higher education acknowledge and respond to the many forces it faces as well as opportunities and venues of innovation?
12. How can/should accreditation redefine itself?
13. How quickly are new entrants to the higher education marketplace and in what numbers?
14. How can accrediting agencies and the accreditation process better stay abreast of and support quality innovation and experimentation?
15. How can the process be less bureaucratic and time-consuming while retaining quality standards?
16. What is higher education's obligation to assist students in becoming adept consumers?
17. What is the role of the faculty?
18. How can HLC assist with important messages to the public about the value-add of faculty, or mentors filling the role?
19. What, if any, is the role of the new majority (part-time, non-tenure-track) of faculty in accreditation?
20. Should there be a range of standards for learning?
21. Once standards are established, what is the role of the faculty?
22. How will academic freedom be addressed?
23. With respect to new shared services, what are the potential conflicts of outsourcing, and how are they mitigated?
24. Should providing student services be an expectation of colleges and universities, or should these services be provided by others?

THE REVOLUTION OF POSTSECONDARY EDUCATION: THE UNBUNDLING

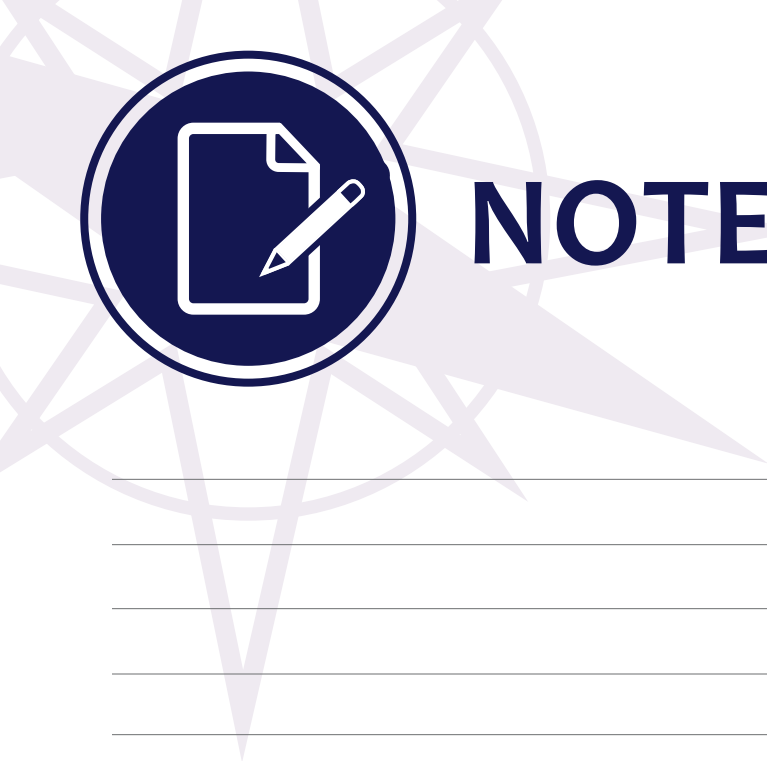
1. What does the current “environment of continual newness” and the unbundling of educational programs and services mean for accreditation post-revolution?
2. How can HLC and other accreditors expand innovation, increase personalization and recognize new micro and macro models of higher education aimed at meeting more diverse learning needs?
3. How can the current accreditation standards and processes adapt quickly enough to support educational innovation that comes with market changes?
4. How can accreditors embrace new models of educational delivery, so the best and most effective education is available to consumers in the marketplace?

23. How is learning measured?
 24. How might competencies be defined through off-campus stakeholders which have an interest in outcomes?
 25. Who decides the outcomes?
 26. How are competencies assessed?
 27. How do students access subsidies in advance of undertaking a program to achieve these outcomes?
 28. How can accreditors convene and work with the stakeholders to establish shared definitions of competencies?
 29. How can HLC consider an evolution to a market and outcomes-based subsidy and regulatory structures?
 30. How do accreditors encourage and support innovation of existing institutions and new providers?
 31. How is the typical college or university positioned to react and lead?
 32. How do colleges and universities change and innovate while adapting to the broader context at the accreditation level?
 33. If accreditation agencies embrace even the most basic innovative ideas, how will institutions and people with their social systems respond?
 34. How can HLC be a champion for outcomes-based education and a leader in defining the outcomes that all providers should meet?
 35. How can HLC support increasing choices among postsecondary options?
 36. How can HLC's approval processes be quick and nimble to accommodate the speed with which innovation is occurring?
 37. How can HLC respond to the revolution happening in higher education or take a leadership role in shaping it?
3. What might be the impact of the recognition of new accreditors to HLC's work and its members?
 4. How should HLC interact with specialized accreditors?
 5. What external stakeholders are important to the way HLC conducts its business – i.e., employers and others that have a significant influence on higher education?
 6. Is there a role for differential accreditation by sector?
 7. What role does or should, HLC play in a climate of actual and potential regulatory change by specialized accreditors?
 8. What are the potential conflicts between the HLC mission and these changes? How does HLC mitigate these potential conflicts?
 9. How well are the roles of the Triad communicated to HLC institutions?
 10. How can HLC better communicate its role (and its limitations) to a continual influx of new students, parents, institutional leaders, and other stakeholders?
 11. How should HLC handle the policies that encourage transfer of credits when the "rights" remain with the receiving institution?
 12. How can HLC handle the conflicts that exist between the accrediting agency's standards and those of a state. i.e., faculty qualifications?
 13. How can HLC handle the conflicts that exist between the accrediting agency's standards and those of a specialized accreditor?
 14. What is the best approach within the Triad to avoid redundancy or duplication of effort and the resultant time and cost to institutions?
 15. In addition to the duplication of effort and burdensome costs, what other consequences (both positive and negative) do institutions face with separate regional and specialized accreditation visits?
 16. How can HLC processes be changed to maximize positive consequences while mitigating negative impact?
 17. How might HLC enhance communications among members of the Triad?
 18. How might HLC address the standards' differentiations?

RELATIONSHIP TO THE TRIAD AND BEYOND

1. How should HLC relate to the states in its region when many states have multiple and/or overlapping layers of regulatory oversight that include several departments of state government?
2. How should HLC interact with state licensing agencies for programs in many professions, i.e., nursing, education and others?

- 19.** What are ways in which all members of the Triad can engage in discussions, and what may be the impact on negotiated rulemaking and the reauthorization of the Higher Education Act?
- 20.** How can institutional accreditors be transparent among agencies?
- 21.** What might be the role of the State Higher Education Executive Officers (SHEEO) in these discussions?
- 22.** What is the role of specialized accreditors in engagement with regional accreditors?
- 23.** Are there ways transparent web-based communications within the Triad could enhance consumer awareness of the varying and collaborative roles of each?
- 24.** What might be the outcome of a strong and transparent Triad?



NOTES

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