

Shaun O'Malley  
Accreditation Critique  
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Accreditation. It is a major topic in the realm of Higher Education because having a positive accreditation status can allow an institution access to federal funding, recruit the best possible students and promote its credentials to the world. The development of the accreditation process is not abnormal and it is not unusual. As Barbara Brittingham outlines in her article "Accreditation in the United States: How Did We Get To Where We Are?," the origins of the accreditation process evolved from a no-government intervention philosophy in Higher Education based upon inexplicit roles of the US Constitution, evidence based upon Supreme Court Cases and Congress' interactions coupled with American values of forming associations to deal with large scale issues, the need for self-improvement, and an emerging culture of extremely diverse institutions of higher learning (Brittingham, 7-14).

In order to regulate these institutions and to ensure that governmental funding was actually going to "legitimate" institutions, accreditation created standards to ensure that all institutions met certain requirements to receive governmental funding. These standards, which are used today, "require a mission-based approach, standards, a self-study prepared by the institution, a visit by a team of peers who produced a report, and a decision by a commission overseeing a process of periodic review" (Brittingham, 14-15). There is a lot at stake. The accreditation process serves as the gatekeeper to the dissemination of over \$90 billion in federal financial aid and it is imperative that the government has some sort of impetus to dictate where the money goes (Brittingham, 21). In most regards, the accreditation process is beneficial because it allows institutions to reflect upon their mission, examine student-learning outcomes and make changes/improvements to better serve the constituents of that institution. In the case of the City College of San Francisco (CCSF), fault on both the institution and its accrediting agency, the Accrediting Commission for Community and Junior Colleges (ACCJC) created a nightmare of lawsuits, which lead to questions of integrity violations on behalf of both organizations.

### **The Purpose of Accreditation**

The US Department of Higher Education has a narrow definition of accreditation. According to the US DoE Website, "The goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality." This leaves a very subjective view of what quality really is. Because of that, accrediting bodies have had to develop or evolve to meet the changing needs of Higher Education.

As Brittingham points out, "Accreditation developed as Higher Education became increasingly important" (Brittingham, 14). With such a rapid increase in growth of Universities, fed by the entrepreneurial spirit of America, it was more and more important for students, parents and the government to be able to choose which institution was a legitimate one (Brittingham, 13). After the influx of financial aid being directed towards institutions of Higher Education, specifically after World War II, the government decided to utilize the accreditation system already in place to decide "quality" institutions rather than create their own system (Brittingham, 13).

The accreditation system is not meant to be detrimental to an institution, especially today where standards have given way from rigid measures of inputs and outputs to a focus on student learning outcomes. According to J. Fredericks Volkwein, it is important for institutions to be mindful of their duty to the constituents they serve as well as to their mission and vision (Volkwein, 4). Volkwein presents this notion through internal self-improvement and external accountability, which is the foundation for the accreditation process (Volkwein, 4). The inspirational approach in accreditation encourages institutions to create self-reviews that foster an environment "ongoing development and continuing improvement," (4). The pragmatic aspect of accreditation uses assessment to "demonstrate accountability to stakeholders; legislators and trustees, taxpayers and tuition payers," (4).

Brittingham maps out the evolution of the accreditation process stating that at first, accrediting agencies main tasks were focusing on "identifying which institutions were legitimate colleges," (Brittingham, 15). A dichotomy exists between stringent standards and institutional diversity, which was changed in 1934 when the North Central Association created a mission-oriented approach to accreditation which is used today (15). These standards, which are used today, "require a mission-based approach, standards, a self-study prepared by the institution, a

visit by a team of peers who produced a report, and a decision by a commission overseeing a process of periodic review” (Brittingham, 14-15).

As Volkwein notes, after 1980 the accreditation process drastically changed and moved from a system that focused on the quality of inputs to match the quality of outputs (Volkwein, 14) and Brittingham notes that the process moved from a quantitative approach to a more qualitative approach (Brittingham, 15). Standards had loosened when it came to accreditation and instead of just focusing on “bureaucratic checklist approaches that emphasized admissions selectivity, resources, curricular requirements, facilities, faculty credentials and seat time, now focusing their reviews instead on attaining educational objectives, particularly those related to student learning,” (Volkwein, 8).

### **Accreditation must be Valuable to All Institutions Across the Board**

Because schools are paying membership dues to participate in these accreditation reviews, it is important, as Brittingham notes, that the process remain of value to all institutions across the board. With that, there are many benefits that come from an accreditation process. Besides access to much needed federal financial aid, accreditation allows institutions to be listed in college guidebooks, consideration for specific grants and employer tuition credits, legitimacy among stakeholders, and important feedback from peers (Brittingham, 18). Accreditation also allows for professional development from all participants involved (whether serving on a site-team visit, a commission panel or preparing your accreditation report for an accrediting body, it allows for a fuller, deeper understanding of each individual institution while sharing new ideas and spreading the good work that is being done at colleges and universities (Brittingham, 19). A self-regulatory process of accreditation also allows institutions to look at questions and issues important to them that they want to improve upon allowing for difference and autonomy from each institution whereas governmental regulation will only focus on specific measurable standards such as the rigid standards accreditation once used such as enrollment rates, retention rates, graduation rates, number of collections in the library, etc (Brittingham, 19).

In order to remain valuable for all institutions, accrediting bodies must walk a tight balancing act. Because accrediting bodies are made up mostly of volunteers from member institutions, accrediting bodies do not report to governmental agencies to dictate their operating standards. However, because accrediting body’s control which institutions have access to over \$90 billion in federal financial aid, the Department of Education does have the authority to decide which organizations they approve for an accrediting authority (Dodd, 13). As Dodd notes, there are 6 regional accrediting organizations that operate within the country (13). Many attempts have been made to “centralize” accreditation and those attempts have proven unsuccessful (Brittingham, 24). Even though each accrediting agency has different operating procedures and policies, overall their mission remains the same and that is to provide unique conversations for institutions to self-evaluate their program, focus on weaknesses, maximize their strengths, open their program up for peer review, and allow for external accountability for all constituents (Brittingham).

Even though the government does not have oversight on the standards or qualities that make up a commission’s decision on offering accreditation to an institution, the accrediting agencies as well as college administrators have felt a pushing and pulling from all constituents involved (Volkwein, 10). Therefore a focus on measuring overall institutional effectiveness has emerged from the accreditation process. Volkwein suggests there are three models for regulating institutional effectiveness that matches the needs of all the different constituents. The first model is the resource/reputation model in which institutions focus on faculty credentials, institutional reputations, financial responsibility, external funding, student test scores and expert ratings (10) which meet the needs of external constituents, taxpayers and governmental agencies. The second model focuses on the client in a client-centered model. This model focuses on student services, faculty attentiveness, alumni success, student satisfaction and tuition cost with available financial aid. This approach helps the constituents attending the institution (parents and students) (10). The third major model focuses on the strategic investment model, which looks at admission rates, graduation rates, time to degree, expenditures per student to meet governmental agencies and taxpayers...the focus cost of investment in comparison to return on investment (10). In order to meet the needs of all constituents and to examine all models, institutional research becomes an important focus on accreditation. Volkwein also suggests that to help minimize costs, accreditation processes can be incorporated in strategic planning processes that already exist, accomplishing both needs through the same or similar processes (Volkwein, 9).

Volkwein notes that measuring student outcomes is complex. And since this has become the centerpiece of accreditation processes, it requires an evaluation of the overall institutional effectiveness (Volkwein, 7). “Good outcomes will not result from flawed educational processes,” (7). As institutional researchers have become a part of the accreditation process to merge already existing self-evaluation reviews and processes on campus with the accreditation process, institutional researchers must measure everything (8).

### **The Big Picture...and What Happened?**

Thousands of schools are accredited across the country and internationally every year, so what happened in the City College of San Francisco case that created an accreditation nightmare? The City College of San Francisco was not doing well. Financially the institution was on the edge of collapse, consistently running on a deficit and dipping into financial reserves to help pay off more than \$14 million in outstanding fees (Fain, 2012). The Chancellor Don Q. Griffin had to resign because of the diagnoses of brain cancer (Fain). With all of these struggles, the institution was on the edge of collapse.

The Accrediting Commission for Community and Junior Colleges evaluated CCSF and issued that CCSF was in violation or non-compliant with 14 major standards for accreditation. As Volkwein noted, institutional researchers must measure everything and since “good outcomes will not result from flawed educational processes,” the accrediting agencies focus on the financial resources, governmental structure, physical, student, technological and financial resources and how they impede the success of student learning outcomes (Volkwein, 7). On July 3<sup>rd</sup>, 2012 the accrediting organization ordered CCSF to remedy the situation in 8 months. Among these areas of non compliance included a lack of formal assessment of student learning or institutional research, inappropriate level of administrative capacity, lack of financial, physical, technological and student resources and services, stunted decision making processes, conflict with the CCSF Mission, strained relationships with the accrediting commission, and board and administrative organization.

After 8 months on March 15<sup>th</sup>, 2013, CCSF submitted a progress report detailing what CCSF has done to comply with the accrediting bodies decision. After a substantial review of the progress of CCSF, on July 3<sup>rd</sup>, 2013 ACCJC concluded that only 2 of the 14 areas were addressed and that in 1 year ACCJC would revoke the accreditation status of CCSF. ACCJC also noted that the problems at CCSF had been ongoing and started long before their review in 2012 and that in 2006, ACCJC also made recommendations for improvements noting that 8 of the 14 areas of non-compliance were identified 6 years earlier.

The decision on behalf of the ACCJC was massive. Officially removing the accreditation status of the City College would have major implications on the 90,000 students enrolled in the institution, the 2,200 faculty and staff members who teach and work at the institution, the 39 administrators that run the institution, and the various businesses or communities that rely on the 12 campuses that were created to educate and sustain such a large system of students (Fain, 2012). Furthermore there would be a burden placed upon all 2-year institutions in the area since the system is already overcrowded and with the City College turning away 200,000 students a year (Fain, 2012).

The original decision to ask CCSF to “show cause” for why their accreditation status should not be revoked and the final decision to revoke the accreditation status sparked lots of controversy throughout the community. As the threat of losing accreditation loomed, students began to drop out of the institution, faculty started to leave and local government, community members and students all started questioning how the situation could have gotten as bad as it was. For a school already suffering financially, the threat of losing accreditation caused enrollment to drop by 14% (Asimov, April 2015). This also created an environment where people sought to figure out how something like this could happen.

The Board of Governors for Community Colleges in California were not happy with the governance of the City College and the San Francisco Mayor and Attorney agreed something needed to be done to discover how a situation like this could have happened. To right the wrongs, the Board of Governors for Community Colleges removed the City College’s board of Trustees and appointed a “special trustee” who would have great oversight into righting the sinking ship. Sadly, in any situation with dire consequences, everyone was placed on the chopping block for review and the ACCJC was party to this investigation. Trustees at the City College stated that

they had no clue that the situation had gotten out of control as bad as it did, administrators said they were working hard to make progress on the 14 areas of non-compliance and the faculty, staff and students were upset because from their standpoint the university was functioning properly.

The ACCJC had a hard job, to make an unwanted decision for an institution who's entire mission was to ensure that as many people as possible could receive an education even if they could not afford to pay it. City College was negligent in collecting over \$4.6 million in tuition dollars and fees from students who could not afford to pay (Asimov, 2013). Interim Chancellor of City College, Pamela Fisher explained to the Board of Governors for Community Colleges in California that the situation developed because, "the college had a very big heart. It tried to do a lot for a lot of people. The college was very generous," (Asimov, 2012). Fisher also noted that City College also hired lots of faculty at higher pay than most comparable institutions and that "San Francisco values...can sometimes get in the way of making good decisions," (Asimov, 2012). This was detailed by the ACCJC when they noted that the institution only had 39 administrators on staff with over 1,200 faculty and that 92% of City College's operating budget went to pay for salaries and benefits for its employees (Fain, 2012).

### **ACCJC Also Had Its Own Problems**

Anyone looking at the situation can clearly attest that there were many failures and flaws in the operation of the City College, especially because at the time of review, City College also did not implement or have any formal assessment of student learning (the most important aspect of accreditation today), however, ACCJC was not without their own problems in the process.

Though this situation cannot be used to describe the entire accreditation process for all 6 accrediting agencies across the country, it does create some questions. The Faculty Unions at CCSF were not happy with the accrediting body's evaluation or their treatment of CCSF and they issued complaints with the accrediting agency. ACCJC did not feel that CCSF's complaints were warranted so the Faculty Union decided to take their complaints to the Department of Education. Among these complaints were issues of a lack of transparency, conflicts of interest and failing to follow state and federal laws (Fain, July 2013). And to complicate matters, The Department of Education agreed with the Faculty Union stating that the ACCJC was non-compliant in several areas and that the ACCJC had 1 year to become compliant or they would lose their authority to accredit institutions (Fain, August 2013).

The Department of Education recognized that the ACCJC did not have an official policy on conflict of interests. The President of ACCJC's husband served on the site-team visit for City College of San Francisco, and recognized that this created an environment where it became impossible to judge if the ACCJC acted without bias (Fain, August 2013). The commission also lacks a policy on site visits and their makeup and the Department of Education agreed that with the Faculty Union that the site-team visit was made up of predominantly administrators and lacked faculty insight (Fain, August 2013). The Faculty Union also declared that the ACCJC violated federal and state laws by not giving CCSF the chance to appeal the accrediting body's sanctions (Fain).

The San Francisco Attorney also filed a lawsuit against ACCJC and the situation went to court. The judge in the situation issued an injunction and put on hold ACCJC's decision to remove CCSF's accreditation. Following the trial, the judge ruled that ACCJC was in fact in violation of federal and state laws and that once the ACCJC made arrangements to correct the situation, they could then make the decision on whether or not they should remove the accreditation status of City College of San Francisco. Judge Curtis Karnow ruled that the ACCJC did indeed break federal law in four areas in 2012 and 2013 (Egelko, 2015). Among these failures, Karnow ruled that the commission's site team visits did not have appropriate numbers of academics on their team and that the site-team make-up was chosen under old rules. Karnow also ruled that the commission never allowed City College the opportunity to talk about and discuss the deficiencies that were discovered by the commission and that the commission itself did not clearly explain those deficiencies (which was also agreed upon by the Department of Education when they felt that it was unclear if the ACCJC's recommendations were mandatory or recommendations for accreditation) (Egelko, 2015). The judge ruled that he was not going to invalidate the commission's decision to declare a "show cause" in 2012 or their decision in 2013 to revoke accreditation, but that the commission is required to allow City College of San Francisco a new review following new procedures. The commission also granted City College a two-year extension to remedy the situation and fix the areas of non-compliance (Egelko, 2015).

## **Where to Go from Here?**

As Volkwein, Dodd and Brittingham have all pointed out, the purpose of the accreditation process was to create a standard across higher education to determine the quality of the education that would take into consideration the diversity of each institution. The process examines institutional effectiveness and student learning outcomes to measure the quality of learning offering an inspirational internal self-review and a pragmatic external accountability through peer review. The goal is to focus on improvements and allow institutions the opportunity to shed light on areas that need improvement. The end result clearly is to make a better institution while continuing to offer quality opportunities to students.

So what are some areas of improvement? As noted by the CCSF vs. ACCJC case, the accreditation process must continue to be a collaborative process where individual institutions take seriously the accreditation process and the recommendations from accrediting commissions. Institutions voluntarily enter into an accrediting relationship, and as a voluntary program, the institution is required to meet certain standards that are developed by its members. The institution enters into this agreement, not selflessly, but in order to remain a viable institution with access to federal funding and marketing opportunities. Why be a part of accreditation review if you do not want to fully participate? The goal is, as Volkwein states, “to build cultures of evidence that feed into continuous improvement systems” (Volkwein, 9).

Accrediting commissions need to become more transparent and up front when working with institutions. In CCSF, the ACCJC on several occasions did not agree with CCSF’s appeals or complaints against unfairness. Accrediting bodies are only as successful as the authority its member institutions give to it. Member institutions pay lots of fees for membership and thus the accrediting agency needs to recognize its member institutions as “customers” and take a more customer-service approach. The job of an accrediting body is hard and sometimes the accrediting agency has to make decisions that are not well-received. Removing accreditation should be an absolute last-resort for an institution. Transparency and clear communication will help to build a true partnership between the accreditation process and the member institution being reviewed. In the CCSF case, doubt was surely cast upon the accreditation agency and its ability to remain unbiased throughout the review process, especially only giving City College 9 months to resolve any conflicts knowing that CCSF was a very large institution and slow on their decision-making processes to remedy 14 areas of non-compliance. The accreditation process can really offer an opportunity for an institution to improve and focus on their students, but the actions of an accrediting agency, once viewed as biased, can have great consequences for all accrediting agencies. As mentioned earlier, institutions are accredited every year, and hopefully this situation does not become the status quo.

Accrediting body’s need to make sure that they are following standards and holding themselves accountable by reviewing their processes and ensuring that they are meeting the needs of their member institutions. Accreditation needs to be consistent, and the Department of Education needs to focus on ensuring that accrediting agencies are consistent. It is clear that the Department of Education does not want to have the control or the final say in if an institution is compliant with accreditation standards, but accreditation agencies cannot issue accreditation on subjective standards. According to data presented about the ACCJC, shows that the ACCJC issues more sanction violations than any of the other accrediting agencies for community colleges. One study by the RP Group found that 41 out of 111 community colleges or 37% of California Community Colleges were placed on some sort of sanction by the ACCJC between 2003-2008 compared to 0 to 6% at all the other community college accrediting agencies (Moltz, 2010).

Accreditation provides an opportunity for an institution to provide an opportunity for internal review and external accountability that the federal government decided to utilize in making decisions about where \$90 billion in federal financial aid goes. The process is a process of constant evolution as changes and needs for higher education change. The goal of the process is to be a collaborative effort between the accrediting agency and a member institution to leave a positive and lasting affect on the institution to better improve for the students that attend the institution. The goal is not meant to be detrimental or conflicting and more work needs to be done to ensure that the accrediting process remains smooth and seamless so that what happened between CCSF and ACCJC never happens again because when a school closes, everyone loses.

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