American Accreditation:
Its Process and Spirit

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Tokyo, Japan
May 15, 2002

It is a pleasure to stand before you today and share some thoughts about the experience in the United States with accreditation, our primary means of quality assurance in higher education, but also a practical tool for institutional improvement. I very much appreciate the opportunity provided me to do this. I speak to you not as a scholar of accreditation and evaluation, but rather as a practitioner. For more than two decades I have been responsible for directing the accreditation process for over 200 colleges and universities in six-state New England region of the United States, which includes not only the most selective and prestigious institutions of higher learning in our country, but also less well known institutions which together serve to provide educational opportunity to well over a half million students

My task is to provide you some understanding of our system of accreditation. I hope to do that by relating to you not only the details of its operation, but also its spirit, which gives it life and meaning, which makes it unique, and which is an essential element of the environment in which our system of higher education functions and thrives. And I wish to leave you with some thoughts as to the essential principles that can be taken from our now nearly 100 year's experience with institutional evaluation which I believe have universal applicability.

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(Before beginning, let me note that I have prepared a handout which provides the addresses for numerous accreditation related web sites in the United States. Obviously, I can't say everything here, and those interested can use, the internet, to learn more. Because the measurement of student learning outcomes is pertinent to accreditation, I have also included a number of sites related to this topic. I understand that this document is being made available to conference participants.)

First some context may be useful. The American system of higher education is marked by three fundamental characteristics: size, diversity, and competitiveness. We have over 3000 degree granting institutions and their range by type is greater than others would think should be included in higher education, particularly those who follow the European university model. We have two year community colleges, undergraduate liberal art institutions, graduate professional schools of all sorts, research universities, though that list does no more than to begin to suggest the compass of our educational universe. I would also note in particular the existence of very small institutions both graduate and undergraduate – often enrolling less than 500 students, sometimes even less than 20, each adding an essential micro-nutrient to our society. Somewhat more than half of our institutions are independent – that is receive no direct public funding. Here the United States has much in common with Japan, the only two countries in the world with large independent sectors, in both nations sources of great educational and more broadly, societal strength. Most students, in the United States attend publicly supported colleges and universities. Over half of the students finishing high school this year in the United States will attend a tertiary institution in the coming year, though the average age of a college student in the United States has steadily increased in recent years and now approaches 30, and as an expression of this fact, the number of part-time students is growing. Also this statistic is powerfully reflective that we have indeed become a national of life-long learners.

Higher education in the United States is throughout a remarkably competitive industry, the result of its relative autonomy within a decentralized federal structure, the large number of independent institutions, our strong cultural incentives for the enterprising,

and the American belief that a largely unfettered market place is more productive of social good than interventionist state regulation. Our system of accreditation permits and encourages this competition. Historically it was invented because of the absence of state involvement in higher education and, provided it continues to do its job well, its existence precludes significant state intervention.

The role of government in terms of quality assurance and oversight of American higher education is quite limited. Washington, though there is a Department of Education, has no direct powers of control. The federal government fundamentally depends on accreditation as its primary quality indicator, but there are no national standards. While higher education is a direct responsibility of each of our fifty states, their intervention, compared to what has been the norm elsewhere, is also limited; the states too depend on accreditation for basic quality assurance. While all institutions must be licensed or chartered, which is a state responsibility, for most independent institutions this does not provide a basis for ongoing oversight or quality assurance except in extraordinary circumstances. Indeed, some of our leading universities benefit from colonial charters, making them, in their mind, totally free as an educational enterprise from state involvement. Even among public institutions, many of whom refer to themselves as only "publicly assisted" reflective of the fact that less than half their support comes directly from the state, there is also remarkable autonomy in law in terms of academic matters and no less importantly by practice.

It is our system of accreditation which provides basic quality assurance within what must be seen from the outside as chaos. Simply put, *accreditation is a status granted to institutions and programs found to meet or exceed standards designed to measure educational quality*. It has dual purposes: quality assurance and quality improvement; it judges but it also helps. Accreditation, in effect, confers a basic legitimacy on institutions. However, accreditation processes are designed in such a way as to encourage the improvement of institutional quality, its other basic purpose. Indeed, I would suggest that the most important product of accreditation is improvement. These

two purposes, quality assurance and improvement, are interlocking, they function symbiotically. I would argue that in any effective system of accreditation both must exist.

Accreditation is private and non-governmental. It is carried out by independent not-for-profit entities, the members of which are the accredited institutions or programs.

Accreditation is non-regulatory but rather self-regulatory. It is the accredited entities themselves who establish and enforce the standards of quality which accredited institutions and programs are committed to abide by.

It is often said that accreditation is voluntary, and in a way it is. There is no explicit requirement that institutions need it to exist. However, accreditation is so written into law and regulation in the United States as the chief indicator of quality and a part of academic practice that it is in practice mandatory (e.g., only individuals graduating from accredited institutions may be licensed to teach, it provides basis for the transfer of academic credit from one institution to another and admission into graduate school, employers typically hire only graduates from accredited institutions, and no parents would allow their child to attend a non-accredited institution). As a result, there are almost no unaccredited institutions in the United States.

Accreditation in the United States is a mature construct. Generally speaking, in its present form, American accreditation has existed for about a half century, though it is by no means resistant to change; its history has been one of growth and adaptation in response to a dynamic system of higher education. Our form of accreditation as our primary system of quality assurance, being non-governmental, non-regulatory, is a condition, though not a cause, which has permitted and encouraged this institutional dynamism which others would like to emulate.

We have two forms of accreditation: institutional accreditation and specialized or professional accreditation. While they share values and approaches, their unit of analysis is different. Institutional accreditation covers the entire college or university; it

encompasses the whole entity, but not any one of its parts specifically. It is carried out by several agencies, each quite autonomous, which cover separate geographical regions; the term regional accreditation is synonymous with institutional accreditation. The agency or commission that I direct, as indicated, has jurisdiction over the 200 colleges and universities in the six state New England region. For some institutions, this is their only form of accreditation which is their sole form of external quality assurance.

Specialized or professional accreditation is program specific. That is, these agencies, and there are about 50 of them, accredit specific academic programs primarily in professional or applied areas such as law, medicine, teaching, social work, clinical psychology, even business administration. The traditional arts and sciences (e.g., history, philosophy, languages, biology, other forms of psychology) do not have separate accreditation agencies; their quality is assured through institutional accreditation.

Organizationally, accreditation agencies are quite similar whether they deal with programs or institutions. They are not-for-profit entities, administered by small paid staffs. A board elected by the accredited institutions or programs provide oversight, determine evaluation criteria and policy, review evaluations, and make decisions about accreditation. The actual work of evaluation is undertaken by volunteers who are most often peer academics.

The accreditation process, generally speaking, is similar among all accreditors. Let me provide a quick overview with the intention of addressing each step in some detail in a moment, placed within context of regional accreditation. Institutions or programs are asked first to engage in self-examination against the criteria or standards for accreditation. The completion of the self-study is followed by an evaluation by a team of peers whose task is to assess fulfillment of accreditation standards by validating the content of the self study report. The team, which undertakes a visit to the campus, prepares a written report of its findings which is then reviewed by the accrediting

commission, again made up of volunteer peers, who make a decision about program or institutional accreditation.

Accreditation is cyclical; comprehensive reviews occur regularly every several years. For institutional accreditation, the period between such visits is a decade and among the specialized accreditors, it is typically somewhat shorter. In granting or reaffirming accreditation, and it is through such actions that the accountability function is expressed, these commissions will specify the timing of the next evaluation and often identify matters of concern to be addressed in the interim. In cases where concerns are serious, reports may be called for and evaluations on progress in addressing identified concerns may also be required. The decision about granting or reaffirming the status of accreditation and its cyclical nature give meaning to the process of self-study and evaluation. However, once accredited with the date of the next visit established, institutions are not left unmonitored. While colleges and universities are essentially stable creatures, they do change, and accreditation processes recognize this. Typically, institutions are asked to submit annual reports which provide basic information, and there are policies on substantive change which require that when accredited entities undergo certain types of change (e.g., begin offering degrees at a higher level than when most recently accredited, begin using new instructional modalities such as distance education) a review of their accreditation is mandated. It is an essential expectation of accreditation that between reviews, while institutions are essentially "left on their own," they will self-regulate, that is function in a manner compatible with accreditation standards.

Let me now talk in some detail about institutional or regional accreditation. The object of analysis, the accredited entity, is the institution as a whole. What are our standards? Or put another way, how have we developed criteria which at once serves as a basis for the evaluation of our diverse set of colleges and universities and encourages that diversity? The criteria applied, given the wide focus of evaluation and the variety of our member institutions, are broad; they are mission-driven and open-ended. While expressed in detail, essentially accreditation standards ask: What is the institution's

mission? Does it have the resources to fulfill its mission? Is it fulfilling it, and can it be expected to do so into the future? Thus, for example, the standard on faculty asks, does the institution have a faculty sufficient in number and by training to offer the institution's educational program? What evidence is there that they are successful as teachers? Does the institution have in place mechanisms and a culture by which there is assurance that it will continue to have in place a suitable instructional staff?

Essentially, what this means is that each institution is evaluated against its own stated purposes. Given this construct, the same standards can be applied to very different colleges and universities.

This broad and open-ended approach to institutional quality recognizes that educational opportunity can be provided in different forms to meet the diverse demand for education found in modern society. It is this definition of quality which has allowed if not encouraged educational diversity, flexibility, and creativity in our country.

Furthermore, this approach in defining quality reflects several things. First, our profound commitment to institutional autonomy. It also reflects our own perspective on quality, that it cannot be meaningfully defined in detail; the content of education is too complex and diverse for that. But also, detailed or highly focused definitions stultify the creativity and experimentation so vital to institutional growth and improvement.

Included in the application of these criteria are all aspects of the institution. Thus there are 11 standards in number: *Mission and Purposes, Planning and Evaluation, Organization and Governance, Programs and Instruction, Faculty, Library and Learning Resources, Student Services, Physical Resources, Financial Resources, Public Disclosure,* and *Integrity.*

There are no normative standards; as noted, colleges and universities are evaluated against their own stated purposes. Obviously, these open-ended criteria call for the application of considerable professional judgment, something we are quite comfortable

with. As suggested, by design and application, they permit incredible variety, even among institutions of the same type, and encourage experimentation. It should also be noted that these are minimum standards, though there are implicit and explicit expectations that institutions will seek to improve themselves. Yes, these criteria result in significant and substantive variation among accredited institutions in terms of traditional aspects of quality. While the institution is accredited as a whole, it is understood that some programs will be stronger than others.

How do we develop our standards; by what processes are they formulated? As noted, accreditation is a form of self-regulation. Therefore, the members themselves periodically assess the effectiveness of their criteria and, as necessary formulate new ones. We have regularly gone through such processes in New England and will soon set about this task anew. Recently, we undertook an evaluation of our standards, seeking the views of member colleges and universities through such individuals as chief executive officers, chief academic officers, and self-study leaders, that is persons knowledgeable about our accreditation and its processes. We also polled evaluators and, as it were, the consumers of our accreditation, employers of college graduates. Our revision process, once begun, will continue to seek this input through a series of meetings with member institutions. Where thought needed, new criteria will be drafted by committees of institutional representatives. We will go through a lengthy comment period allowing institutions to react to any changes, before new standards are finally adopted. This process also results in a sense of ownership of and commitment too the standards. The point of this detail is to suggest that accreditation is and should be highly participatory. That the very nature of self-regulation mandates the thoughtful involvement of institutions if it is to be effective.

Turning our attention to how these standards are applied, let us begin with self-study. It is important to think of self-study in two ways, first as a *process* and then as a *product*. The process. Essentially, this is typically a two-year effort largely about broadly participatory candid self-analysis and reflection which seeks to measure the institution against the standards for accreditation. Its purpose is primarily improvement.

Institutions essentially assess their own effectiveness with an eye to identifying strengths and ways to maintain and improve them as well as concerns which need to be addressed if the institution's success in fulfilling its purposes is to be enhanced. It is also a product in the form of a report, a document of about 100 pages which relates the findings of the process of self-assessment. This report serves as a basis for further review for accountability purposes.

The process itself is most often characterized by a committee structure topped by a steering committee, which gives leadership to and directs the process as a whole, and sub-committees, each of these responsible for one of the standards. Who is on these committees? A broad range of faculty and administrators. Most often, the process is led not by the president; generally CEOs are at arm's length from day-to-day self-study activities. Nor is the chief academic officer usually in charge. Self-studies are most often directed by a senior academic knowledgeable of and experienced with the institution. Similar individuals make up the various committees. While responsible administrators may be involved with a particular subcommittee but not in leadership roles, e.g., librarians would certainly serve on the library sub-committee, they do not chair it. In this way, we believe, the process, while it has some risks, can be more searching and productive.

The various subcommittees and the steering committee spend their time thoughtfully considering, often debating, how well the institution meets the relevant standard, offering a view of what improvements are necessary and how they might be achieved. This, obviously facilitates one of the purposes of accreditation, institutional improvement.

I might also note that the commission I work for provides a two-day self-study workshop in the fall to assist institution in understanding expectations as well as planning for the organization of the effort. We include a special session for presidents, who while not expected to be directly involved in the self-study effort, must understand its purpose and possibilities for the institution and the necessity of giving to it importance by relating to the institutional community their commitment to an effective and useful effort.

As a product, in the form of a 100 page report, the self-study is an exercise in generalization. This requires the winnowing of subcommittee reports to assure only grain and not the chaff is found in the final document. Admittedly, this is not an easy task. However, this distillation results in a focus on broad, often systemic, institutional issues, issues that cut across organizational and program boundaries. It also assures the usefulness of the process for improvement by precluding an emphasis on minutiae and the trivial.

We ask that the document's format be comprised of three components: description, appraisal, and projection. The first, description, seeks to describe the institution in its current state of development against the standards for accreditation. This is meant to be a largely factual exercise. Appraisal is meant to assess how well the standards are met. This is in many ways the most critical component which demands not only considerable professional judgment but also great candor. Finally, there is projection. Here the institution is asked to outline the steps it will take in response to its own findings to preserve and enhance strengths while also addressing those areas in need of improvement. Thus, the self-study is a blue print for institutional development. In this sense, self-studies have a life outside of the accreditation process by serving institutional purposes aimed at improvement.

A moment ago, I mentioned the importance of candor. Clearly, honesty and frankness are essential elements of effective self-appraisal. Without them, the self-study is likely to be no more than public relations document. Implicit in this observation is an understanding that improvement only comes with candor and the identification of issues to be addresses, with acceptance of the idea that no college or university is perfect and that all should strive to improve. Admitting weaknesses, finding deficiencies is not a fault, rather it is a strength.

Do our institutions take self-study seriously? Particularly those of great prestige even though their accreditation is unquestioned? The best evidence is found in their self-

studies, many of which are posted on the World Wide Web. I would encourage each of you to spend some time, for example, reviewing the self-study report of Yale University.

The self-study report is the primary document used by our committees which undertake the actual evaluation of colleges and universities. Essentially, the task of these groups of peers is to validate the self-study. If they find a document is which not candid and forthcoming, which endeavors to hide difficulties, the conclusion that they draw is that the is unaware of the challenges it faces, or worse, that it seeks to deceive, something unlikely to succeed.

What of the evaluation process? It is important to understand that the accreditation process in the States is heavily dependent on volunteers. We have a small staff; the commission I work for has four professional and three clerical staff, with an annual budget of approximately $1,000,000 – this to oversee about 200 institutions. In addition to offering leadership in matters of policy, its formulation and application, and otherwise relating and assuring that commission expectations are fulfilled, the staff's task is to manage and coordinate the evaluation process.

The actual work of evaluation is carried out by unpaid volunteers, faculty and administrators from accredited colleges and universities. This kind of voluntary commitment is seen in all aspects of the commission's work; hundreds give of their time and expertise every year. Obviously, this kind of committed participation is a key element in fulfilling the self-regulatory character of accreditation. Why do people volunteer, spending considerable time in preparation and the actual work. First, it is interesting and professionally rewarding. If you are an academic interested in higher education and concerned with your own professional development, you benefit from examining and learning from seeing another institution. Beyond that, there is an implicit recognition that without voluntary efforts, accreditation won't function properly, and the alternative, governmental intervention, something seen as deleterious to higher education, is the likely result. So, there is a kind of carrot and stick at work here.

The commission in putting together its evaluation committees draws from a list of approximately 800 individuals. We endeavor to include senior and respected persons with considerable experience, important characteristics given that the task is essentially about applying professional judgment. This group covers the full range of institutions by type and size as well as includes the expertise necessary to apply the various accreditation standards. Thus, for example, the President of Yale University is one of our evaluators, as is a student service officer from a small two-year junior college. We seek to maintain a cadre of individuals who have experience in our process, but as a membership organization, we also constantly add new persons to our list of possible evaluators, seeking to broaden and deepen institutional participation.

Our teams, which again actually visit the institution with the task of determine if accreditation standards are met, vary in number depending on the size and complexity of the college or university under scrutiny. A team can be as small as three, but is rarely larger than 10. Each team must include individuals knowledgeable about the several standards to assure that they are applied appropriately. Typically led by a chief executive or chief academic officer, but occasionally a faculty member or dean, a team would include several faculty, a librarian, a student service officer, and an individual with knowledge of administration and finance.

The concept of peer is important in team selection. Remember, we have mission driven standards, so it is critical that the individuals applying them have an appreciation of the nature and content of the institution they will be assessing. Thus, for example, it would do no good to have a team of individuals from research universities with a highly selective admissions policy evaluating a small junior college. Also, it is important, if the process is to have validity, for the team to be respectable and creditable in the eyes of all involved.

Most of our teams are comprised of individuals who have served before, but we also try to include new persons on each visiting committee. Prior to going out, we provide

training not only to assure an understanding of the process but also an appreciation of the expectations the commission has of them.

Our evaluation visits usually begin on a Sunday afternoon and conclude by the noon hour on Wednesday. This is period of highly intense and concentrated activity; the days are long and the nights short. How do teams spend their time? They do so collectively and individually. The first activity is a joint team meeting and they also get together at the end of every day to discuss their findings and seek consensus on the conclusions they need to reach. In such meetings they work as colleagues, in principle each equal to the other in terms of their relevance and potential contribution to the success of the process. To be sure, the team chair is important, but if he or she does their job effectively, they will not dominate the process, rather the will facilitate it, working toward a common effort in which all participate and advance the success of the effort. In this regard, the goal is to create a sense of ownership as well as a sense of commitment to the work of the team as a whole. We want no prima donnas, rather a strong collective enterprise where the contribution of each is important and distinctive.

Apart from their evening meetings, the team mostly works in small groups or as individuals. Their work is primarily interviewing institutional personnel; though some effort is also devoted to reviewing institutional documents. This activity reflects at once their individual expertise as well as their assignment. Evaluators are given specific standards to apply. For example, as one might guess, the librarian on a team is responsible for the standard on the library. But this means more than visiting the library and discussing its effectiveness with its staff. In addition, such a member of the team would want to have interviews with individuals who use the library – faculty and students – as well as the academic leadership of the institution.

Important committees are interviewed, e.g., curriculum and promotion and tenure. Trustees meet with the team and we always ask that teams hold open meetings where anyone from the college and university can come to say whatever the believe the team should hear.

As noted, the essential task of evaluation in the process I am describing is to validate the self-study. And like the self-study process, candor, openness, and an unfettered willingness and ability to identify both strengths and weaknesses are essential on the part of both the institution and team in the evaluation process. We recognize that some aspects of accredited institutions are stronger than others, that weaknesses do exist, and to be sure it is the task of the team to uncover them, or better to substantiate the institution's self-study findings in this regard. The end here is not to tote up deficiencies, to point the finger of criticisms for its sake alone, to be inspectors wearing white gloves seeking to identify every deficiency that they can find. Rather evaluators function as critical colleagues whose task is to assist the institution in its strive for excellence, something that cannot be done except though forthright analysis. To be sure, the team must come to a conclusion about whether or not the institution fulfills the standards for purposes of accreditation, but most of the team's time is spent on how to assist the institution in its improvement. For us, the identification of weaknesses is not something to be feared, but rather it is a way toward betterment.

Evaluation teams conclude their work by presenting an exit interview to the institution's leadership. Essentially, what is provided here is a summary of team findings which at the end is expressed in a list of major institutional strengths and concerns, or opportunities for improvement.

As with self-study, these evaluations, is necessarily broad brushed. The resulting team report, again like the self-study, is an exercise in generalization. Our visiting committees can at most do a kind of sampling with the evaluative emphasis frankly varying somewhat among accreditation reviews at different institutions; they lack a kind of bureaucratic consistency, the result of non-professional peer participation and a process that recognizes the fact that different things are important at a given moment at different universities. Thus accreditation reports of evaluation committees, while they all reflect certain essentials, are not exhaustive and comprehensive renditions assessing the institution in detail. Furthermore, they do not engage in comparisons of one

institution against others; remember each is evaluated on its own merits against mission-based standards for accreditation. Reports seek to address broad issues facing the college or university. The task is to be diagnostic, not prescriptive; team reports identify problems but don't provide solutions. In the spirit of accreditation, our commitment to institutional autonomy preclude us from doing so.

Reports, which are drafted by the teams themselves, are rarely longer than 30 pages. (Examples are available on the Web; those interested can use the handout provided for access to these documents.) They provide a summary of team findings and are concluded, again by a summary list of strengths and concerns as related at the exit interview. As with everything else I have related, candor and frankness must characterize these documents if the are to be useful. To be sure, its important that they be cast in a helpful, rather than hurtful manner.

While the parts of the report are initially drafted by individual members of the team, the final document is prepared by the team chair. And once the penultimate report is completed, it is sent to the institution for correction of errors of fact. And, upon submission of the final report to the institution, the president is asked to prepare and submit a written response to the report, giving emphasis to those activities undertaken subsequent to the visit designed to address its findings.

Of course, the work of accreditation is not done with the completion of the team report. It must be considered as a part of the final step of the process, action by the Commission on Institutions of Higher Education on the institution's accreditation. Here, like every other step of the process, accountability and improvement, the dual purposes of accreditation, are mixed. But before discussing this last aspect of our process let me relate a description of the commission itself.

Comprised of 18 individuals, it is elected by the member colleges and universities. Its tasks are two fold. First, it is the policy making body; it determines the standards for accreditation, following the consultation process discussed earlier, as well as sets

polices for their application. Second, it reviews and takes action on the accreditation of individual institutions. In other words, they both fashion and apply accreditation policy.

15 of the commissioners come from accredited institutions. Like members of evaluation teams, they are faculty and administrators. Too, like our teams, they represent the various areas of institutional activities reflected in the standards. Thus the current commission includes chief executive and chief academic officers, faculty, librarians, an academic dean, and individuals with expertise in student services and well as administration and finance. The commission also reflects the range of member colleges and universities by type. We have both public and independent institutional representation on the commission, persons for research universities as well as two-year colleges, and many in between.

Three commissioners are what we call “public members,” that is persons who have no affiliation with an institution. They are there to represent the public’s interest. We believe that higher education exists to serve the common good, to advance the well-being of society. Given the importance of accreditation in fulfilling broad societal goals, we are convinced that the public has an interest in the work of the commission, that it is ultimately accountable to the public, and this is best done though these public members who are considered in every way equal in terms of their voice and vote on matters before the commission.

The commission meets four times a year, two days at each meeting. While some time is given over to policy discussion, most of their efforts are devoted to considering institutional reports and taking action on accreditation. At least some members of the commission receive full sets of institutional documents: self studies and related materials, the team report and institutional response. All members of the commission receive and read each team reports, of which there maybe as many as 20 to consider at a meeting. The agenda book may be several inches thick, not counting self-studies.

By way of process, the Commission first has discussions by itself, but also meets with the team chair and the president of each institution evaluated. Essentially, the task is to determine if the visiting committee came to appropriate conclusions. The team makes a recommendation to the commission regarding accreditation as well as any follow up activities believed necessary. The commission considers this and may modify it as they believe necessary. Commissioners take their role very seriously; they work hard; commission meeting are intense; and the focus of attention is on the dual purposes of accreditation – accountability and improvement. They too function more as critical colleagues than officious inspectors, their goal is to facilitate improvement, but when they find serious deficiencies which threaten accreditation, the do take negative actions, something necessary if they are to fulfill their public responsibility.

A word or two about the actions taken by the commission which I think will give further and maybe some concluding insights into the accreditation process. As noted, action is taken on accreditation. That is a determination is made whether to grant or continue institutional accreditation. But it doesn't stop there. Accreditation is an ongoing relationship between the institution and the commission. Thus, in its action, the commission will also identify what it expects from the institution in the future. Among other things, the timing of the next evaluation will be identified. If there are concerns that have been identified, an interim report may be requested on those concerns. It may be followed by an evaluation visit focused solely on its content. Most institutions are placed on a ten-year evaluation cycle, that is comprehensive visits, the sort of visit preceded self study as I have describe, occur decennially. All institutions on this cycle must submit a report at the fifth year. Here too, the Commission will identify matters to be particularly addressed in the interim and reported on. Thus improvement though accreditation is ever before the institution. Of course, it is desirable that there be a clear connection related to improvement at each stage of the process that I have described. That is, this process works best when the findings of the self-study are validated by the visiting committee in its report, which in turn find their way into the commission's action. Throughout,efforts are directed toward the identification of those important issues which the institution should address if it is to improve. Candor, the capacity to self-criticize

and to accept constructive criticism are critical elements in the success of the effort at the institution.

Let me turn in conclusion to some suggestions as to what might be learned from our experience with accreditation. It is not my intent to offer up the American model for adoption in its detail. There are some principles, however, which we have learned from our experience which are, I believe, applicable in any system of higher learning contemplating the implementation of an evaluative processes.

The first principle is that *institutions of higher teaming should regulate themselves*. The self that I am referring to here, is the community of higher education, all the institutions taken together, or at least appropriate sets. I believe that given the singular character of higher education and its special role, societies are best served if our colleges and universities, individually or collectively manage their own affairs.

Several ideas stand behind the principle:[1]

1) Self-regulation is preferable to and in the long run more effective than any form of external regulation.

2) Any system of external regulation can be effective only to the extent that it recognizes and builds upon a group's willingness to engage in self-regulation.

3) A substantial number of people and institutions will regulate themselves along agreed upon lines if they know what behavior is expected by the group and why.

[1] Adapted from Understanding Accreditation, Kenneth Young, ed.

4) An overwhelming majority of people and institutions will regulate themselves along agreed upon lines if they believe that they might be identified by peers as not doing so.

5) Only a small number of people and institutions will deliberately engage in behavior that they know will be disapproved by the larger group. No matter how many laws are passed or rules written or inspectors hired, antisocial behavior by these types cannot be inhibited or prevented.

Are there flaws in the self-regulatory framework? Of course. As Winston Churchill once said of democracy, it is the worst form of government, except all those other forms that have been tried from time to time. This applies to self-regulation, a form of democracy. It is not a perfect approach, there is none. Its chief defect is that it can be self-serving. Institutions and programs, in charge of their own destiny, can be accused of having a tendency to undertake their self-regulatory activities in a way least burdensome and most beneficial and which does not always result in desired ends. This happens as individuals forget that autonomy carries with it obligations. Indeed, there are probably greater obligations for self-regulating institutions than for those subject to only external control. Essentially, self-regulation calls for self-restraint, for a willingness to subordinate personal or institutional desires to greater demands. We can never forget that institutions of higher learning exist to serve the public good. While life in the academy can be pleasant and rewarding, the purpose of the university is not to serve those who work there, bit rather to create a framework for the public good to be served. There is a need to balance rights and responsibilities, though a perfect balance can never be achieved; tensions will always exist between external needs and internal control. There are no easy and universally applicable solutions to matters such as these. They require continuing attention.

Certainly, the self-regulatory approach is more likely to achieve one of the primary goals of evaluation: improvement. This then is the second principle I would like to enunciate as validated by our experience in the States: *a primary purpose of evaluation should be*

improvement. There is a corollary here, bringing these two principles together. *In the self-regulatory framework, evaluation if it is to be about improvement, should be initiated as an internal process.*

While self-regulatory evaluative mechanisms can be designed in a variety of ways -- I would offer no set formulas here -- regardless of how organized, evaluative efforts should also assist in, and otherwise lead to, the encouragement of improvement, effectiveness, and excellence of affected institutions or programs. These things must initially come from within the institution, they cannot be imposed from the outside. As I will state later, external evaluation is a necessary component of any quality control process, but without this internally generated improvement component, external evaluation is capable of much mischief.

Let me build on these ideas here a bit. In referring to internal evaluation I am talking about self-study. As we have seen, in our evaluative scheme of accreditation, institutions as the first step of the evaluative process engage in an introspective analysis of the institution against certain criteria.

In many ways, we believe that the self-study as process -- the very act of engaging in a searching self-criticism -- is more important than the resulting written report. As I have noted, what we ask in self-study is that the various elements of the community be engaged to reflect on the purposes and effectiveness of the institution, to examine its strengths as well as its weaknesses, and where problems or opportunities are identified, to begin to work toward their solution or fulfillment. Our experience has been that the goals of self-study as a device for institutional improvement are most likely to be achieved when there is a sense of ownership and commitment. This can only occur within the self-regulatory framework. Indeed, if this sort of meaningful self-review does not occur, of course, the validity of self-regulation is placed in question.

However, I believe it is difficult to establish confidence in institutional performance through only self-study or internal evaluation. To be sure, many benefits can accrue to

the institution. There are numerous evaluative models which are purely internal which demonstrate this. But their primary goal is improvement not quality assurance.

This brings me to my next principle -- *meaningful assurance about institutional quality is best developed through a scheme of external evaluation*. There are some corollaries here drawn from other principles: *The best external evaluation is based upon a self-regulatory model. External evaluation should build upon or otherwise be keyed to existing efforts at self-study or internal evaluation and in so doing foster excellence while also providing assurance about program or institutional quality.*

Let me expand. Internal evaluation activities do little, in and of themselves, to convince those outside the academy -- governmental officials, legislatures, the citizenry in general -- that quality exists or that the institution is living up to its potential in serving the public interest or, put more simply, that the institutions receiving public support are doing what they should be doing. At best, self-study efforts are not understood, and, at worst, they are seen as self-serving exercises which are either designed to cover up institutional deficiencies or to squeeze the public purse for more support. Except in rare cases, few decision makers outside the academy will place credence in an institution's or programs self-proclaimed quality. This was not always the case, but it is increasingly so, and they can't be blamed for it.

Therefore, external validation must exist if there is a need to demonstrate the existence of quality, and there increasingly is such a need. But like internal evaluation, schemes for external evaluation should be based upon a self-regulatory model. A few moments ago, I gave the rational for self-regulation. It applies to internal and external evaluation equally well. But aren't external evaluation and self-regulation incompatible? I think not, and our experience demonstrates the possibility, indeed, the preferability, of combining the two.

Any number of formats can be devised, but they should have in common certain elements. The first is peer review. The best judges of programs or institutions are

practitioners from other institutions which have similar goals. But they must be demonstrably free of bias and apply standards for evaluation which have been agreed upon by the group. We find it useful to engage another body of peers to review the work of this primary group or groups to assure the reliability and validity of their findings.

Possibly one of the best reasons for undertaking external evaluation through a system of peer review is that there is a greater likelihood that institutional improvement will result while at the same time providing effective quality control. Peers tend to be less threatening, except where threats are needed, than outsiders. Thus, there is a greater possibility of openness and frank assessment in the self-study phase as well as during any form of external evaluation. Peers are more likely to understand and appreciate the unusual character of higher education, and as peers, knowledgeable of how the system operates, they are less likely to be victims of deception.

External assessment is compatible with the encouragement of improvement. There should be a natural link between the two which, while not without tensions, in effect results in the mutual strengthening of both processes. To that end, it seems to me that what any group of outside evaluators ought to be about is complimenting the internal evaluation undertaken by the institution or program. They should provide quality assurance while also facilitating improvement, assessing while encouraging, judging while helping.

Are there problems in undertaking external evaluation through self-regulation? Of course. Chief among them is an issue of credibility. Can higher education really be expected to police itself? The only way that interested individuals -- ministers, legislators, businessmen, students, the public -- will be convinced that this is possible is for higher education to do the best job it can: to be stronger self-critics than anyone external to the academy would think of being, to establish and insist on compliance with the highest of standards, and to be uncompromising when confronted with rot. As a result, no one will be able to develop a case for anything but self-regulation, and the institutions and the public they serve will be the true beneficiaries.

If a basic purpose of evaluation, internal or external, is improvement of quality, it is fair to ask what is quality? Without some sort of definition, will an institution in self-study or a group of external evaluators know quality when they see it? Clearly, both forms of evaluation, given what I have said here, should be working with the same definition. Both must have a sense of direction, they must have a concept of the goal they are striving to achieve. This brings me to my next principle -- *institutions or programs should be evaluated, internally or externally, against their own stated purposes.*

This principle, as we have seen, is reflected in our mission-driven standards, the summary of which is best expressed in a series of questions:

1) Does the institution have appropriate purposes or goals?

The concerns here are several. First, the goals or mission must be relevant and suitable. It must be derived through a thoughtful process and it must give direction to all of the institutions activities. The very process of developing a commonly accepted understanding mission has great value.

2) Does the institution have sufficient resources to achieve its purposes?

Resources here are conceived broadly. Some are obvious -- laboratories, faculty, library -- but resources can also include curriculum, governance, and intangibles like commitment, understanding, and leadership. Also involved is the proper organization of these resources.

3) Is the institution in fact, achieving its objectives?

This is, of course more difficult and represents a central dilemma in our system of higher education. Just how do you measure whether or not an institution is effective or not? Difficult question. Clearly some things are not measurable, but others must be.

We have not, nor do we intend to, develop a universal set of measures. Within the framework of self-regulation suggested here, institutions themselves should derive their own mechanisms for assessing the achievement of its own goals. But these mechanisms and the findings which result from their implementation should be externally validated.

4) Lastly, does the institution give evidence that it has the capacity to continue to fulfill its purposes?

Obviously, here we are concerned with the future. Institutions should organize themselves so as to continue to have the ability to achieve institutional goals. Planning is important here, but so are clearly subjective considerations, such as vision.

Quality then, is the effective organization of sufficient resources to achieve institutional goals now and into the future. Of course, it is necessary to take this paradigm and expand on it with particulars so as to make it apply to specific situations, again as we have done with our accreditation standards.

All of this can be said to be subjective and open ended. But, I believe that it is greatly preferable to any more explicit or numerical standards. Experience with such standards, apart from those which relate health and safety, have not generally been satisfactory. Education and educational systems are too complex and appropriately varied for quality to be reduced to a formula. Such formulas do not serve us well.

So far, I have given you a number of interrelated principles which I believe are important for effective evaluation. Through their application, internal and external evaluation can be brought together effectively not only to provide appropriate quality assurance but also to foster improvements in quality all to the end of serving the public good. However, I would leave you with one last principle -- *systems of external evaluation designed to provide public quality assurance should be accountable to the public they serve*.

In the United States we refer to accrediting agencies such as the one I work for, as quasi-public. That is, they are private organizations -- in this case and association of member or accredited colleges and universities -- but they fulfill a public role or purpose. Government depends on our activities in lieu of maintaining its own system of quality assurance. We have a public responsibility and it is reasonable to be held accountable for the demonstration that we are effectively fulfilling that responsibility through our system of internal and external evaluation and peer judgment and in doing so ultimately serving the public interest.

This demand for accountability, however, cannot be heavy handed. It is best achieved through a general oversight which applies reasonable criteria in a process of periodic review. Such criteria should never be prescriptive nor provide the specifics of quality assessment. To do so would work to destroy the very idea of self-regulation. The frequency and nature of reviews of compliance with these criteria is best left to local circumstance. Indeed, here more than anywhere else, local customs, culture, and politics should dictate the precise nature of this aspect of the evaluative process. However, it should not result in interference with quality assessments nor should it review of actual decisions about quality.

Let me conclude by saying that I hope you found my words useful and meaningful and that you find some application of them for your circumstances. It has been my pleasure to work with Japanese educators over the years, and I look forward to continuing our collaboration.