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April 11, 2007

Dear Colleagues:

The basic message of this letter is that if the public information function of accreditation is pursued only or primarily in consumerist terms, the accreditation system will become enveloped, narrowed, and ultimately corrupted by public relations considerations, and the larger national interest will be adversely affected. Please read on to find out why, and why understanding these issues is important for you and your institution.

It is typical for our office to receive messages from middle school students that read: "Dear NASAD: Please send all your information." Obviously, NASAD and other accrediting associations have a great deal of detailed institutional data and analysis. Most is confidential. Typically, release is the prerogative of each institution; however, accrediting organizations also provide a great deal of public information. Web sites have greatly expanded access, especially to information about organizations, standards and review systems, and the accreditation status of institutions.

When an accrediting organization publishes the fact that an institution or program has been accredited, it means that the institution or program has demonstrated compliance with a published set of threshold standards, and that the institution has definite plans to continue improving its programs. A few published words signify the successful completion of a comprehensive review, the terms of which are specified and available for all to see. In difficult or problematic situations when an institution or program does not meet threshold standards or is in jeopardy of being unable to deliver the programs published in its catalog, accrediting organizations have mechanisms for warning the public by publishing probationary status or revocation. Accrediting organizations also publish descriptions of what accreditation status means in terms of degree and program offerings, ways to contact staff, and even hyperlinks to the Web sites of accredited institutions.

In terms of volume and comprehensiveness, there is no lack of public information regarding institutions of higher education and their accredited statuses.

Traditionally, the most important aspect of accreditation is the self-analysis created by each institution or program. After all, it is those responsible who have the most local knowledge and thus the best qualifications for making futures projections and decisions. The concept of self-study is based on premises of trust, fundamentally, that most people working in institutions and programs are committed to doing their best and to making improvements; that they, not accreditation or government, are the daily sources of effort, initiative, creativity, and achievement.

For the self-study process to be honest and useful, institutions must self-identify what is wrong or needs to be improved. Those experienced in accreditation know that institutions and programs are usually thoughtful and astute in making such judgments. Institutions conduct reviews willingly as

long as their self-identified weaknesses, needs to improve, or aspirations remain confidential or under their control. At times, certain resource needs and weaknesses are made as visible as possible. But other issues addressed in self-study reports are not in this category. Some analyses are speculative, some deal with sensitive or highly complex information that is easily misinterpreted, especially when presented in forms used to communicate with other experts.

One of the multiple functions of accreditation is the provision of information useful to students. For all sorts of reasons, students do not want to attend an institution that has no accreditation at all. Specialized accreditation has various relationships to student interests and decisions depending on the nature of the field and the sophistication of the student. Contemporary American society is replete with consumer information. Reports, ratings, and analyses of all kinds pour forth about various products. Of course, the manufacturer or producer of these products is usually 100% responsible for the result the consumer receives. Even though higher education does not work in the same way, there are those who believe that the same consumer information approaches should be applied. From this position, a seemingly logical progression follows: accreditation generates information about institutions and programs; this information, if made public, would fulfill the same function as a restaurant rating service or performance comparisons of automobiles in the same price range; predictable, certifiable results from use of the product can be provided – if you buy this car, you will be able to go from zero to sixty miles per hour in ten seconds; if you enroll in this school… .

Using this line of thought as the basis for political action, the next step is to look at current policies and practices, declare an insufficiency of public information, propose the mandated release of all or certain kinds of accreditation information, and bolster the proposal by asserting that accreditation confidentiality is in direct conflict with the public interest. This argument makes sense to those who believe that providing consumer information is the only public interest issue in accreditation. Transparency is the justifying word. But as we have shown, there are many publics, many interests, and many public interests.

Those truly seeking to improve the quality of information for students choosing where they will apply or go to college would follow a different sequence. The logical steps are to ascertain the kind of new or different information needed, determine where that information is located, and consider how to combine and present the information honestly and more effectively than at present. If accrediting organizations have or could contribute to the provision of such information, then ways can be found to do so without damaging other aspects of various public interests that accreditation serves.

One way to begin reviewing these other aspects of public interests is through several brief considerations about confidentiality. Almost everyone from individual citizen to lawmaker understands the importance of having areas and places where confidentiality is preserved. This is especially true in a highly competitive society where there seems to be less and less compunction about indiscriminate or deceitful use of information that is even slightly negative or can be spun toward implication. As technology advances, many are increasingly concerned about privacy, the preservation of sacrosanct individual or local spaces. Total accountability and lack of privacy are features of totalitarian societies. If there are negative public relations or financial consequences for revealing problems, problems tend not to be revealed. Of course, both confidentiality and openness can be misused. But wise policies take a variety of considerations into account and place confidentiality in a productive relationship with the various purposes and needs present in any situation; the complexities of such relationships are recognized, understood, and acknowledged openly; and competing public goods are balanced in workable ways.

Where does all this leave us with respect to accreditation and its relationship with institutions and programs, and with the public interest? First, the public has an interest in accuracy. Falsehoods, half-truths, assertions that parts are wholes, snippets of truth as the basis for deception and spin are not acceptable in the accreditation arena. The overall approach to confidentiality in the traditionally conceived accreditation system is structured to avoid and prevent these kinds of possibilities. Some want to require each accrediting agency to prepare a summary report for the public following each accreditation review that would summarize findings, including weaknesses and areas for improvement. On the surface, this restaurant-review model may sound good. But in practice, it would risk tremendous damage because it would produce a reductionist and therefore misleading picture of almost every institution. For example, most institutions work hard to resolve weaknesses or improve conditions, and are often in the process of doing so as the full accreditation review concludes. Also, many of the weaknesses identified in accreditation reviews are not failures to meet threshold standards, but the basis of initiatives being taken to advance the capabilities of the institution. Each institution is reviewed every five or ten years, so all reviews are not close enough in the same time frame for weakness identification to remain current or fair in a competitive market-driven society. Such proposals would also put the accrediting association in the public relations business because each accreditor would have to summarize or editorialize about or characterize the results of an extremely complex review. Many individuals active in the higher education policy arena do not yet understand the dangers involved if accreditation were to move functionally from the businesses of notifying the public of threshold compliance and supporting improvement to being a direct factor in the public relations positioning of an institution or program.

Moving in such a direction is not in the public interest broadly defined. The public may not know or understand or even wish to do either, but it has a deep and abiding interest in a review system that promotes continuous improvement on substantive, content-based grounds in ways that deeply and honestly engage the institutions and programs themselves and support local analysis, speculation, vision, initiative, and achievement. Public interests are served by the engagement of experienced volunteer professionals who bring expertise to trust-based peer-review systems. The general public also has an interest in keeping educational costs low, and in maintaining the best conditions for institutions to raise funds from donor individuals and organizations.

The wrong policies on disclosure of accreditation information have the potential to damage all these public interests. Turning accreditation into another public relations exercise where the prime consideration becomes the production of public images rather than internal analysis and thoughtful open review of future possibilities is not in the public interest. Such a structural abandonment of substance and content would be foolish and damaging to the intellectually based efforts of our higher education system. The wrong approach can also do untold damage to the reputations and fund-raising abilities of institutions. It can create a climate that is adverse to volunteerism, and increase the prospects of litigation. To speculate for a moment: under such a proposed scheme, what would the operational effect be when the first student sues an accrediting organization because he did not pass the state licensing examination, he thinks the institution is 100% responsible for his education, and the "summary" of weaknesses published by the accrediting organization did not include his major? The wrong policies regarding public information will be engines of mistrust. Further, they could provide accreditation organizations with far greater leverage over institutions than is appropriate, thus damaging necessary separations-of-powers arrangements and systems of checks and balances.

Wise policy-making will find ways to assist the public with its consumer information needs without damaging these and many other equally important interests. The difficult and dangerous thing now is that some in the federal government wish to intervene deeply in the public

information function of accreditation, and to regulate that relationship along purely consumerist lines.

Moving accreditation in just this direction is one of the most prominent recommendations of the Commission on the Future of Higher Education empanelled by the U.S. Secretary of Education. Such a result is a natural consequence of the long-term promotion of a consumerist position by leaders of the outcomes movement, coupled with the values generated by a culture increasingly shaped by sound bites and thus illusions of simplicity.

Here we have yet another perspective on why the traditional accreditation system is being attacked; a new variation on the theme of taking a part and pretending it is the whole, in this case, pretending that consumer information is the only important aspect of the public interest. But as we have shown, no public relations or political technique and no exhortations from high positions can make it so.

The danger to higher education and accreditation goes far beyond the irritation of dealing with myopic policy proposals and their potential bureaucratic aftermath. When there are attempts to use law and regulations to make such proposals control the evaluation environment in which our nation pursues so much of its future capability and capacity in all fields of endeavor, the prospects of losses in many areas of comprehensive national interest are great indeed.

Our next letter will consider the critical relationship between accreditation and student learning.

Thank you for your consideration and best wishes.

Samuel Hope
NASAD Executive Director