THE CHANGE LEADER, INC
Transforming Higher Education Institutions

# Transcript: Changing Higher Ed Podcast 144 with Host Dr. Drumm McNaughton and Guest Ralph Wolff

## Institutional Accreditation is in Dire Need of Change

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Welcome to Changing Higher Ed, a podcast dedicated to helping higher education leaders improve their institutions, with your host, Dr. Drumm McNaughton, CEO of the Change Leader, a consultancy that helps higher ed leaders holistically transform their institutions. Learn more at changinghighered.com. And now, here's your host, Drumm McNaughton.

**Drumm McNaughton** 00:31
Thank you, David. Today, we welcome back Ralph Wolff, founder and former president of the Quality Assurance Commons for Hire and Postsecondary Education, and former president of WASC, the Western Association of Schools and Colleges, Senior College, and University Commission. For 17 years, Ralph innovated accreditation, especially governance, assessing learning outcomes, and transparency aspects. We pick up where we left off with accreditation and the need for innovation.

Ralph, welcome back to the show. I'm looking forward to continuing our conversation from last week.

**Ralph Wolff** 01:10

Thanks, Drumm. We had a great conversation, and I look forward to it again. This could go on for quite a while. You have a good amount of experience with many of the same issues.

**Drumm McNaughton** 01:25
Thank you. I appreciate that. Last week, we discussed the criticality of accreditation and that when you look at university accreditation, you should look at the entire thing. That's how I learned my trade, being on accreditation teams and working with institutions. I'm sure you're the same way.

**Ralph Wolff** 01:56
I agree. The kind of accreditation that I was involved with and continue to be involved with is institutional. That means looking holistically at the whole institution. This includes one of the topics we touched on the last time: what is quality, who defines quality, and how we evaluate institutions because they're linked.

Accreditation is over 100 years old and continues to have the mindset of being a faculty-centric model. We see that in the standards that mandate shared governance and faculty being responsible for the curriculum. Initially, quality meant the quality of what we call inputs, i.e., the facilities and selectivity of students. Typically, middle- and upper-class whites went to colleges other than HBCUs. But the demographics have changed dramatically. We have online education. Quality has shifted as well. Because institutions are so large, accreditation typically looks at processes, program reviews, assessments of student learning, shared governance, documents, policies, and how they're implemented. Then we say we're looking at outcomes.

Last time, I talked about how we could put much more emphasis on specific outcomes because they are so much more relevant in today's world, such as debt load, how many students are graduating or not graduating, are they are graduating with employable skills, following up with students who are employed what kind of jobs they have, and disaggregating that data.

The Georgetown University Center on Education and the Workforce has done reports on who gets good jobs. It's typically white males. How do we address that? How do we mentor? How do we support first-generation students and the like? I think that quality shifted when *Academically Adrift* came out. We looked at issues of academic standards and rigor. More recently, we've been looking at employability skills, job performance and salaries, and the ability to pay off debt. That's one of the things we tried to bring together: high-quality academic programs and employability skills with Quality Assurance Commons that I founded.

But these issues of what quality means today are changing before our eyes. It's adaptability, teamwork, the ability to work with new technology, and traversing multiple careers in one's lifetime. As we see with these massive layoffs, lifetime employment is no longer typical of today's graduates. So, quality is changing. What students need to know is changing. Accreditation should be leading these kinds of conversations, as it does the evaluation of institutions.

How we formulate our standards still has that strong faculty-centrism. That's not a bad thing. But many institutions now employ a vast majority of adjunct faculty. In the last 30 years, we've gone from 75% full-time faculty to about 35-37%. There's a lot that's been written about that. But that means we must evaluate how these adjunct faculty are deployed and how they are

supported and trained. We must consider that when assessing student learning and employability skills.

Institutional governance is based on a typical model of traditional research universities. However, suppose we're looking for agile institutions today. What are some new models of governance that don't eliminate the role of faculty but allow quicker and more decisions to be made around adapting institutions?

**Drumm McNaughton** 06:42
So, I hear you saying we must do away with the Faculty Senate. I'm just kidding.

**Ralph Wolff** 06:49
I will say this. I have seen accreditation team reports that challenged institutions with effective faculty models, calling for a more formal senate model. There are different ways that different kinds of institutions can adapt governance to serve their students more effectively.

I don't want to eliminate the faculty role. But a traditional faculty senate model that is separate from and often antagonistic to the administration can be a barrier to change. I've seen that happen too often. One of the most significant criticisms I've had when working with employers is that it takes so long to get higher education, or even a particular department, to change its curriculum to serve the needs of the workplace. Employers are frustrated and often give up. I've seen the Chamber of Commerce working on creating an alternative model to enable employers to sidestep higher education.

**Drumm McNaughton** 08:07

It's a real challenge. From an accreditation and employer perspective, higher ed is known for not changing. Look at what happened at the beginning of COVID. It forced institutions to go online, sometimes within a week or two, after never having a program. Up to that point, you probably had 70% of full-time faculty saying that they would never teach online. But they went online and said, “Oh, this isn't so bad now that we got the work out of the way.” But you still have this “the sins of the father, the sins of the son” mentality. This is the way I learned, so this is the way it has to be. There has to be a way to change quickly and be more responsive to employers and what students need. The economy isn't what it used to be 50 years ago. You don't keep a job for your entire career. People change, so we have to adapt to it.

**Ralph Wolff** 09:17
Absolutely. I agree with you. That's why I was atoning for my sins and setting several standards even before I was president of WASC. I worked on four different handbooks and sets of standards. I focused heavily on academic rigor, quality, diversity, and outcomes, but not employability.

Let me cite this story. I was once deposed, not as a defendant, in a case brought by graduates of a counseling program that did not prepare them well for licensing. The attorney for the plaintiffs asked me, “When you accredited them, what standards did you apply to?” It was just a program within a larger institution of around 100 programs. And they said, “Were you aware that this program had the lowest licensing rate of any in California at the time? Only about 35% to 37% of graduates are licensed.” This information was unavailable because it's not required of public or nonprofit institutions, only for for-profits.

The truth was, I did not know. I wouldn't have known because we don't ask for that information. I immediately said, “That is relevant information. Given all the professional accreditation and licensing, shouldn't accreditation look at how well we prepare graduates for licensed professions? And what kind of employer feedback should the institution get?”

This is something that we need to do more of. There are many education programs where teacher licensing could be much higher. We could go on with other programs. There are nursing programs where it's very high and should be commended. So, there can be a great deal more attention paid to licensing certification issues, performance, and employer satisfaction. We should know that. It shouldn't be to prepare people for just one job, to be sure. But, repeatedly, mentoring and internships are cited as the two most important things that will enable people to make that transition, as well as counseling and identifying the range of jobs available. This is particularly important in the case of first-generation, underrepresented students.

**Drumm McNaughton** 12:02
Should licensure be the criteria institutional accreditors (i.e., WSCUC, Middle States, SACSCOC) focus on? Or should that be really in the bailiwick of specialized accreditors? Should it be programmatic accreditors?

**Ralph Wolff** 12:23
That’s a good question. There are professional accrediting agencies, but not all professionally accredited programs lead to licensure. So, for example, you can prepare somebody for counseling without being accredited by the Counseling Accrediting Agency. It's not a mandate. But in law, you must have ABA approval, except in a few states. So, it depends on the nature of the licensure.

What if it's on probation? Would we need to know if a program is on probation if you're accrediting the whole institution? If there's trouble, then you need to know.

There is tremendous tension at higher ed institutions when the accreditors come and demand particular issues, such as needing more faculty or resources. However, many believe that's one of the main reasons why institutions get professional accreditation. It's not only about gaining external recognition but also a wedge to get more resources and respect internally within the institution.

But there's a role for understanding the relationship of which programs are professionally accredited. For example, some institutional accreditors will say that if you're professionally accredited, your program leads to licensure, and your data is good, your program review will be different and handled separately. So, yes, we should be aware of that fact. And when there are problems, we should be drawn in.

**Drumm McNaughton** 14:09
That goes to the accountability piece – who is holding accreditors accountable? It's the accreditor's job to hold institutions accountable, and they're doing it for the Department of Education, especially when there's Title IV funding. But is the Department holding accreditors accountable? The ACICS [Accrediting Council for Independent Colleges and Schools] is certainly one example of this, but I don't see it happening.

**Ralph Wolff** 14:38
That's a great question. There are different kinds of accountability. Let's start with having served on the NACIQI. There are a whole set of federal regulations, and I railed against applying those regulations on whether

institutions had a policy, whether it was written, was there a piece of paper that showed you applied it. But there is very little on effectiveness and very little in the law that allows the Department to make any value judgment. So, it's very much a policy, procedure, and demonstrating you have it.

The Department has made several changes around governance that have been stifling. None of the formerly regional accreditors have been able to maintain relationships with those associated with K-12 schools. They've all been separated. New regulations now make all formerly regional and national accreditors "institutional accreditors" and national in scope. So, yes, there is a form of accountability, but it needs to be more focused on effectiveness.

When I was on NACIQI, we worked to create a data dashboard to look at the kinds of judgments that accreditors make. But there's no compilation or analysis of who gets on probation. What are the reasons for being put on probation? How do they cross regions or nationally? The only study that I have seen Steve Leshley did for what was called College 101, where he used a federal database and found how irregularly sanctions were used and how a tiny percentage of the total decisions were made. There is no real, deep, underlying analysis. That gets us back to transparency.

There's a different level of accountability: How accreditors characterize their organizations as membership organizations and the requirement that the membership elects their commissions. It's a conservatizing force if you will. Members do not want the accreditors to get too far ahead of where they are because they will be held accountable to those standards.

At the same time, the policymakers outside higher education are saying, "Look, we have $1.7 trillion in student debt. We have rising costs. We have

an attrition rate. We have inadequate preparation for jobs." There are these significant policy issues, and the question is, is accreditation dealing with them effectively and effectively communicating that well? So much more could be done. This is where public members of the commissions could play a much more critical role. Taw requires one to seven public members, but are they actual public members? They acculturate, and whereas that's not bad, public members on accrediting boards should be aware of what the public demands on accreditation, which are connected to but separate from what the membership wants.

This goes back to the definition of the quality of the mindset. You could have trustees eliminating tenure and imposing post-tenure review. So, we have to be careful. We don't want to go overboard and have public members overreaching. But this is often the case when there is not a clear understanding.

However, there are severe public policy issues that accreditation needs to be held accountable for. Unfortunately, rules and laws take too long to address. Accreditors should be working on getting ahead of the curve around these issues. But because they are no longer bound by the regions and states they serve, the challenge that accreditors now face is that because they are potentially competing, can they even work together?

**Drumm McNaughton** 19:29
That's a perfect point. We've talked about this. In 2019, the Negotiated Rulemaking did away with distinctions between regional and national accreditors. There are no "regional accreditors." They're all institutional accreditors right now, whereas you had a group of the regionals through C-RAC [The Council of Regional Accrediting Commissions] that would discuss

things. They don't meet anymore because they're concerned about antitrust violations, etc. So, that's not necessarily a good thing.

We're coming up to the end of our time. We've got about 10 minutes left. There are a couple of hot points out there that we need to discuss, like the polarization of higher ed and the boards. We just saw Governor DeSantis replacing or nominating new people to the board of New College in Sarasota. They just voted a few days ago to remove the president. This goes right to the political ideation of higher education. It's not good.

**Ralph Wolff** 20:43
No, one of the touchstones that accreditation has tried to preserve—which has been challenged by not just Governor DeSantis but other people—is the quasi-independence of publicly funded institutions from the political process. The fact that the governor appoints trustees or regents can lead to severe intervention, interference, or politicization around particular gubernatorial imperatives or ideologies. It can go in any direction. SACSCOC is particularly prominent in addressing those issues.

But this is not just a Florida issue. It gets to the core of, are faculty civil servants, and do they have to respond to gubernatorial initiatives, or is there a firewall of protection? This relates to the board's role and the board members' training. Is their fiduciary responsibility to the governor, or is it to protect the institution's integrity, quality, success, and effectiveness? That is a challenge that we see in higher education. It's merely an extension of the polarization and politicization in our society. It's a very tough issue.

Let's take New College, for example. I don't know if it's a liberal institution. But, having worked with Great Book Schools, I know that to become a Great Book School would be a fundamental shift in its mission. If it were to

become driven by an ideology similar to Hillsdale College, as the governor has talked about, that would be a dramatic shift in its mission. Accreditors would need to look at that and ask, how is that being done? What are the implications? And if students were recruited into one culture, how would that affect them? It's a big Issue.

**Drumm McNaughton** 23:19
Yes, absolutely. Another issue is the elimination of "regional accreditors." They're competing against one another. Do we have too many accreditors out there?

**Ralph Wolff** 23:34
I hope I'll be alive long enough to see if this will become true, but I predict there won't be room for or reason for seven formerly regional accreditors in 15 or 20 years. The WASC region is divided into two-year and four-year and above with the Senior Commission and Community College Commission. You currently have the Higher Learning Commission with 19 states and 1,100 institutions and SACSCOC with 11 states and 800 to 900 institutions. Then there will be the rest, which will be much smaller in scale. We will likely see mergers. There are reasons to merge. To have seven different accreditors makes no sense. I've thought that for the last 20 years, frankly.

But let me say this. This goes back to the transparency issue we discussed in the last accreditors session. We don't know what differences these seven agencies have because we don't have access to their reports and decisions in any detail. Therefore, how can we say that SACSCOC is too rigid? Is it? It has the QEP [Quality Enhancement Plans]. You have different approaches by different from accreditors. How effective are they? Who is looking at assessing these accreditors' effectiveness in delivering on their promise? Because it's a black box, I firmly believe we need more capacity and

analysis of accreditors' work to see the differences. What can they learn from one another? That's not happening, and that's unfortunate.

**Drumm McNaughton** 25:49
It really is. Ralph, I knew this was going to happen. We're at the end of our time again. I want to thank you so much for being on the show. I thoroughly enjoyed our conversation. What are three takeaways for university presidents and boards?

**Ralph Wolff** 26:09

- The first takeaway is to support accreditation and help it change for the better.
- The second is that transparency is good for accreditors and your institution. Look at the models where transparency within institutions has made a big difference, like Georgia State and the UT SEEK system. There are many different places where this is being done and can be done.
- The third is to participate in accreditation to make it better.

Drumm, you have served on teams. Before joining the WASC staff, I served on and chaired teams. It's an excellent opportunity. It's a way of learning about how others operate. I would encourage people to not only get involved but to make it better. There's much room to improve accreditation without throwing the baby out with the bathwater.

Ultimately, it's about serving our students, and our country needs a high-quality higher education system. Our system can be made better. It's facing tremendous challenges. Let's work together to make that happen.

**Drumm McNaughton** 27:38
I fully agree. Ralph, this has been fabulous. Thank you. I'm going to echo your last recommendation about serving on accreditation teams. Once someone is in any leadership role, whether it be a department chair or in charge of assessment for your institution, they should start serving on these teams and get a sense of how other institutions do it. They will bring back such great ideas to their institution. We'll also be able to validate the great things that your institution is doing. Thank you for that.

What's next for you?

**Ralph Wolff** 28:19
We should keep exploring these topics in writing or other ways. I am working to support a couple of startups that are trying to bust the system. We need new approaches to accreditation and providing a rich education to underserved students. And I'm enjoying life. I've moved to Sedona, hiking, biking, and developing my spiritual side around the beauty of these red rocks here. But I love being able to continue this work to innovate. I look forward to collaborating with so many good people who also want to improve our higher education system.

**Drumm McNaughton** 29:05
Thank you, Ralph. I'm so pleased that you're semi-retired at this point. You're enjoying life. I look forward to the next time we get a chance to talk.

**Ralph Wolff** 29:15
You bet. Likewise. Take care, Drumm.

**Drumm McNaughton** 29:20

Thanks for listening. And a special thank you to our guest, Ralph Wolff, for sharing his thoughts on higher education accreditation and what it needs to do to stay relevant in today's higher ed world.

Our next guest is Michael Feldstein, chief accountability officer at e-Literate and an expert in artificial intelligence and machine learning. Michael has a strong background in both K-12 and post-secondary education. He'll join us to discuss AI/ML and how it can help higher ed institutions.

29:56

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