Institutional Accreditation: Making the Process More Efficient, Effective, and Meaningful to Colleges and Universities

Cynthia J. Requa
*University of Washington – Tacoma*, crequa@uw.edu

Follow this and additional works at: [https://digitalcommons.tacoma.uw.edu/edd_capstones](https://digitalcommons.tacoma.uw.edu/edd_capstones)

Part of the Educational Assessment, Evaluation, and Research Commons, Educational Leadership Commons, Higher Education Commons, and the Higher Education Administration Commons

**Recommended Citation**
[https://digitalcommons.tacoma.uw.edu/edd_capstones/63](https://digitalcommons.tacoma.uw.edu/edd_capstones/63)

This Open Access (no embargo, no restriction) is brought to you for free and open access by the Education at UW Tacoma Digital Commons. It has been accepted for inclusion in Ed.D. Dissertations in Practice by an authorized administrator of UW Tacoma Digital Commons.
Institutional Accreditation:

Making the Process More Efficient, Effective, and Meaningful to Colleges and Universities

Cynthia Requa

A dissertation submitted in partial fulfillment
of the requirements for the degree of
Doctor of Education
in Educational Leadership / Higher Education

University of Washington
2021

Supervisory Committee:
Rachel Endo, Ph.D., Chair
Robert MacGregor, Ed.D., Member
Joyce Loveday, Ph.D., Member

Program Authorized to Offer Degree: Education
Abstract

Institutional accreditation is a voluntary, peer-review process that is overseen through the seven institutional accreditors governed by the U.S. Department of Education. The purpose of accreditation is to ensure institutional quality standards are being met by the colleges and universities. The purpose of this study was to identify how the accreditation process could be improved with foci on efficiency, effectiveness, and more meaningful and direct impact to the institutions. Drawing on Heifetz et al.’s (2009) theory of adaptive leadership, Kotter’s (2012) accelerators and the integrated planning principles of Stephens (2017) and Immordino et al., (2016), this study employed grounded theory to discover the experiences, perceptions, and potential solutions to accreditation challenges. Within the region that is overseen by the Northwest Commission on Colleges and Universities (NWCCU), 23 institutional leaders including administrators and faculty from two- and four-year institutions from both the public and private sectors residing in four states (Nevada, Oregon, Utah, and Washington) were interviewed or participated in focus groups. The findings revealed several successes as well as challenges. In general, colleges using a more integrated rather than disparate-compliance approach to accreditation have found added success in all aspects of the process. The assessment of student learning remains a challenge at all levels due to a lack of clarity regarding how to design the evaluation of learning in a manner that prioritizes clear outcomes and meaningful planning. Findings from this study offer implications to support higher education personnel in integrated planning for greater alignment of resources and continuous improvement; the assessment of student learning and achievement; and institutional effectiveness.

Keywords: accreditation, strategic planning, integrated planning, assessment, continuous improvement, Northwest Commission on Colleges and Universities, NWCCU
Acknowledgements

I have been blessed with a most remarkable supervisory committee. To my chair, Dr. Rachel Endo, I would like to thank you for your tireless efforts, suggestions, edits, and readiness to dive into the next round. Your guidance throughout the process has been steadfast and has made all the difference.

To Dr. Joyce Loveday, thank you for helping me to strengthen my connections between strategic planning and institutional effectiveness, and your constant encouragement. Having worked for you from 2008 to 2012, it was wonderful to have you on the committee close to a decade later. In this age of the pandemic, I especially appreciate you hosting my defense at your institution.

To Dr. Robert MacGregor, the questions that you asked throughout the study, including ones regarding the theoretical framework, helped me frame and reframe my thoughts. I appreciate the approach you took in helping me to refine the manuscript. I greatly value the support you have all given me on this journey.

The insights that each of you brought to the study and the suggestions that you offered helped make this project what it is. For me, it has been a remarkable and enjoyable experience. It was a distinct honor to collaborate with you on this study and I want to thank you all one last time for accompanying me on this adventure.

I would like to thank the NWCCU team and specifically Sonny Ramaswamy, president; Pamela Goad, executive vice president; Mac Powell, senior vice president; and Les Steele, senior vice president (retired) for their continuous support throughout my practicum and dissertation. It was a blessing having them in my court and advocating for me.
I would like to express gratitude to the UW School of Education for providing financial support for me to complete the Society of College and University Planning—Planning Institute I & II and the NWCCU for their support to attend NWCCU events. This support was crucial as I did not have professional development funding provided through my employer.

I would like to recognize the love, support, and sacrifices that my family made to make this pursuit possible. Most especially, my loving husband, Jay Requa, for not blinking an eye when I said that I wanted to work part-time while working on my doctorate, even though that made a significant decrease in our family earnings. I want to express deep gratitude to my daughter, Sarah Requa, for reading my manuscript and offering well-thought-out suggestions even at 2am. They both willingly made life changes to accommodate and support me throughout this process.

Our oldest daughter, Brit Gessler has been married for seven years. I would like to thank her, our son-in-law, Troy, and my grandchildren Troy (5yrs), Lily (3yrs) and Titus (5mos) Gessler for always being ready to provide wonderful breaks from the study and continually bringing me great joy. Finally, I would like to express my gratitude to my parents Grover and Peggy Daniel and sister, Natalie Daniel for their support and love throughout my program and life. You have always been there for me. I can never truly convey the depth of my love for you.

Thank you to all of you for allowing me to pursue my dream.

"God, grant me the serenity to accept the things I cannot change, courage to change the things I can, and wisdom to know the difference."

Reinhold Niebuhr
# Table of Contents

Abstract ................................................................................................................................. 2  
Acknowledgements.............................................................................................................. 3  
Chapter I: Focus and Significance ...................................................................................... 8  
  Statement of Problem ......................................................................................................... 9  
  Rationale ............................................................................................................................ 11  
  Theoretical Framework ..................................................................................................... 12  
Chapter II: Literature Review .......................................................................................... 17  
  Brief History of Accreditation in the U.S. .......................................................................... 17  
  Increase in the USDE’s Regulatory Authority ................................................................... 20  
  Institutional Effectiveness .................................................................................................. 22  
  Quality Assurance and Continuous Improvement ............................................................. 24  
  Brief History and Overview of the NWCCU ..................................................................... 26  
  Perceptual and Procedural Challenges of Accreditation .................................................. 28  
Chapter III: Methods ........................................................................................................ 32  
  Study Design .................................................................................................................... 32  
  Instrumentation Protocol ................................................................................................. 33  
    Round One ..................................................................................................................... 33  
    Round Two ................................................................................................................... 34  
  Sampling and Participants ............................................................................................... 35  
  Sampling .......................................................................................................................... 35  
  Participants ....................................................................................................................... 35  
  Strengths of Design .......................................................................................................... 37
Limitations .................................................................................................................. 37
Impact of the Pandemic ............................................................................................ 37
Researcher’s Experience ......................................................................................... 38
Institutional Review and Protection of Human Subjects........................................ 39
Pseudonyms and Gender-Neutral Pronouns .......................................................... 40
Data Collection and Analyses ................................................................................ 40
Chapter IV: Findings .............................................................................................. 43
Continuous Improvement Cycle ............................................................................. 43
Planning .................................................................................................................... 44
Disparate-Compliance Approach ........................................................................... 45
Integrated Approach ............................................................................................... 47
Evaluation Challenges ............................................................................................ 49
Continuous Improvement ....................................................................................... 54
Perceptions of the Standards for Accreditation ..................................................... 57
A Brief History of NWCCU Standards .................................................................... 57
Revised NWCCU 2020 Standards .......................................................................... 59
Improvements ........................................................................................................ 59
Concerns ................................................................................................................ 62
Moving Forward ..................................................................................................... 63
Professional Development and Training ............................................................... 65
Clarifying the Purpose of Accreditation and the Standards ................................ 66
Accreditation at Large ............................................................................................ 66
The Standards ....................................................................................................... 69
The Need for State-Wide Training ............................................................................................................ 70
Supporting Accreditation Liaison Officers .............................................................................................. 72
Supporting Evaluators ............................................................................................................................. 74
Planning and Structuring Meaningful Site Visits ..................................................................................... 75
More Time and Collegial Evaluation ......................................................................................................... 75
The Need for Evaluator Team Continuity and On-Going Conversations ................................................... 78
Peer-Evaluation Recommendations ........................................................................................................ 80
Chapter V: Discussion ................................................................................................................................. 83
Implementing and Integrating a Meaningful Continuous Improvement Cycle ........................................... 83
Making the Eligibility Requirements and Standards More Efficient, Effective, and Meaningful to Colleges and Universities ...................................................................................................... 87
Professional Development and Training .................................................................................................. 88
Improving the Quality of Site Visits .......................................................................................................... 91
Recommendations for Future Studies ........................................................................................................ 94
Conclusion .................................................................................................................................................. 95
Reflections .................................................................................................................................................. 96
References ................................................................................................................................................ 97
Appendix A: Institutional Participants ...................................................................................................... 101
Appendix B: Framework for Open-Ended Interview ................................................................................ 102
Appendix C: Dissertation Consent Letter .................................................................................................. 103
Institutional Accreditation:
Making the Process More Efficient, Effective, and Meaningful to Colleges and Universities

Chapter I: Focus and Significance

Over the 20 years I have served in higher education institutional effectiveness, I have served on numerous accreditation committees, as an accreditation liaison officer, and as an accreditation evaluator. Whether working with faculty, staff, or administrators within a college, my colleagues across the system or the region, or as an evaluator, one common theme has emerged: college personnel are frequently unsure about what needs to be included in accreditation reports (Paton et al., 2014; Schmadeka, 2012a). This collective uncertainty was reiterated and expanded upon in a December 2017 meeting in the region overseen by the Northwest Commission on Colleges and Universities (NWCCU). In 2010 the NWCCU released a revision to the Standards for Accreditation outlining the process that colleges were to follow. As part of the NWCCU’s continuous improvement process, and in preparation for the 2020 revision to the Standards, the Commission collected feedback from its members regarding the changes including asking what questions members had regarding the process and suggestions for improvement.

To facilitate this discussion, the NWCCU held several breakout sessions by topics and multiple time periods that allowed members the option to attend several sessions. During the sessions, several members expressed challenges regarding difficulties in reporting, especially with how to evaluate and report on student learning outcomes (SLOs). Many specifically cited: that faculty and other personnel lack sufficient time or resources to do this work; challenges meeting the timeline for reporting; not knowing who their college should contact at the NWCCU regarding questions about the Eligibility Requirements and Standards, and the process of accreditation at large; and concern regarding the amount of resources that colleges use to meet
accreditation requirements (P. Goad, V. Martinez, & L. Steele, personal communication, December 5, 2017).

**Statement of Problem**

There exist challenges across higher education institutions regarding employees’ knowledge of the requirements around accreditation reporting (Paton et al., 2014; Schmadeka, 2012a) and the expectations for site visits (NWCCU member colleges, personal communication, December 5, 2017). Institutional accreditation is a voluntary, peer-review process that is overseen through the seven institutional accreditors: (1) Middle States Commission on Higher Education (MSCHE); (2) New England Association of Schools and Colleges, Commission on Institutions of Higher Education (CIHE); (3) North Central Association of Colleges and Schools, The Higher Learning Commission (HLC); (4) Northwest Commission on Colleges and Universities (NWCCU); (5) Southern Association of Colleges and Schools Commission on Colleges (SACSCOC); (6) Western Association of Schools and Colleges (WASC), Accrediting Commission for Community and Junior Colleges (ACCJC); and (7) WASC, Senior College and University Commission (WSCUC).

The commissions are in turn overseen by the U.S. Department of Education (USDE). Data and information from the commissions are often used by prospective students to decide which institutions to consider attending (Schmadeka, 2012a; Eaton, 2012; Sibolski, 2012). Institutions must maintain compliance with accreditation eligibility standards to offer federal financial aid to their students (Paton et al., 2014; Schmadeka, 2012a; Sibolski, 2012). That is, most institutions of higher education would not be able to remain in operations without access to these funds, as the high cost of attending higher education would prohibit many students from being able to afford the cost of tuition (Middaugh, 2012).
For over a century, the USDE utilized accreditation to measure and ensure institutional quality standards for higher education (Ewell, 2011). However, changes were enacted due to a combination of World War II veterans reporting that they were not receiving quality education with their GI Bill funds, an increase in federal tax dollars being released for financial aid (Eaton, 2012; Sibolski, 2012), and the heightened attention of employers stating that college graduates generally do not appear to have all of the skills necessary for effectively fulfilling job requirements (Hall, 2012; Middaugh, 2012). The U.S. Congress made modifications to accreditation Standards through the 1992 extension of the Higher Education Act checklist, followed by SLOs in 1998, and greater transparency was brought about through more frequent peer-review reporting of institutions across the Standards in 2005 (Wergin, 2005).

The mandated inclusion of SLOs as more comprehensive and reliable measures of substantial and meaningful evidence of student academic achievement and institutional continuous improvement processes (Eaton, 2012; Ewell, 2011; Hall, 2012) resulted in higher levels of accountability among reporting institutions and the rigor in the accreditation process itself. Yet, despite these changes, there remains uncertainty among higher education professionals surrounding the assessment of student learning for accreditation purposes, including and how to link SLOs and other accreditation standard requirements with their college’s operational work (Schmadeka, 2012a). In this project, I conducted interviews with a cross-section of administrators and leaders (institutional and NWCCU), as well as through analyzing NWCCU documents, to address the following question: How can the process of institutional accreditation be approached so that it is more efficient, effective, and meaningful to colleges and universities?
Rationale

Representatives of various member colleges in the NWCCU region have stated that the processes involved in meeting and remaining in compliance with institutional accreditation require a significant amount of financial and human resources (personal communication, December 5, 2017). The expenditure of resources for accreditation reaffirmation activities, including use of time, people, funding, physical office space, equipment, and software, represent a substantial burden for most colleges and universities (NWCCU member colleges, personal communication, December 5, 2017; Schmadeka, 2012a; Baer, 2017; Head, 2011).

An institution of higher education must be accredited by an institutional commission to offer students federal student financial aid. If an institution loses its accreditation status, then it cannot offer Title IV funding, which includes Federal Pell Grants, Federal Supplemental Educational Opportunity Grants (SEOG), Federal Perkins Loans, Federal Subsidized Loans, and Unsubsidized Direct Loans. As most institutions in the U.S. are tuition-dependent, a lack of federal financial aid impacts the ability of an institution to remain viable, as the high cost of higher education would preclude many students’ ability to pay for their education (Middaugh, 2012).

Accreditation is a multi-faceted process that college and university faculty, staff, and administrators are responsible for fulfilling in order for their institutions to remain financially viable, ensure fulfillment of mission through activities, curricula / programs, and operations. Moreover, accreditation provides a mechanism for continuous improvement, creates opportunities for multi-stakeholder feedback, and to fulfill the overarching goal of ensuring public accountability. When institutions engage in accreditation activities, it is often perceived by employees as reducing the amount of financial and human resources that are available for
other activities such as serving current students and attracting potential students (NWCCU member colleges, personal communication, December 5, 2017).

**Theoretical Framework**

At the highest level, strategic planning is a process by which an organization aims to achieve its mission and vision (Immordino et al., 2016). Manning (2011) tells us that to accomplish mission and vision goals, all of the institutional accreditors require purposeful, ongoing, systemic, institutionalized planning with clear evaluation plans and outcomes for learning, program, administrative, and institutional expectations. Higher education employees advance institutional change through strategy development, as well as the implementation and evaluation of both short- and long-term institutional goals. Stephens (2017) explained that strategic planning in higher education is focused on creating needed cultural change and accelerating organizational momentum to ensure adaptation to changing industry demands.

Although strategic planning is recognized as being critical to mission fulfillment and continuous improvement, it is not uncommon for administrators and faculty to be unsure of: (1) how to develop effective strategic plans; (2) how to determine what the potential risks and benefits are; and (3) who should be involved in the development of the plans (Immordino et al., 2016). Accreditation recognizes strategic planning as one of the elements that is necessary to achieve mission fulfillment, and therefore an integral part of the process itself (Falluca, 2018; NWCCU, 2020; Immordino et al., 2016).

The field of strategic planning was born out of the military (Stephens, 2017), which represents a constantly changing high-stakes environment. Stephens emphasized that an organization’s ability to recognize and respond to external and internal changes in the environment is paramount to the purpose and process of successful strategic planning. The
author offered eight specific insights for effective strategic planning including: (1) shorter time spans; (2) broad brushstrokes; (3) effective communication; (4) simplicity; (5) use of data; (6) maintaining a competitive edge; (7) organizational alignment; (8) and leadership (Stephens, 2017). Stephens (2017) and Immordino et al. (2016) also stated that the strategic plan, budget, and key resources including employees, facilities and technology, policies and procedures (NWCCU Standard Two), and use of data, must be aligned to ensure high levels of institutional effectiveness (NWCCU Standard One) resulting in the attainment of strategic goals and mission fulfillment. Immordino et al. (2016) add that college-wide, cross-disciplinary, involvement with faculty, staff, and administrators is imperative for successful strategic planning and implementation. Moreover, strategic planning, when done well, should align with accreditation activities, including outcomes assessment and reporting to meet accreditation requirements with the greatest resource efficiency (Brodnick & Norris, 2016; Immordino et al., 2016; Manning, 2011).

When an organization moves from the strategic plan design to implementation, a meld of Kotter’s (2012) accelerators and Heifetz et al.’s (2009) theory of adaptive leadership can be utilized by institutional leaders for strategic goal attainment, mission fulfillment, and to instill transformative cultural change. In the case of institutions of higher education, the development, implementation, and evaluation of academic and student support programs occur to better support student learning. Through connecting the accreditation process to strategic planning, adaptive leaders can use the continuous improvement process facilitated by accreditation reviews to make meaningful data-informed decisions about their programs, services, and other institutional activities (Fallucca, 2018; Brodnick & Norris, 2016; Manning, 2011; Heifetz et al., 2009; Kotter, 2012).
Many of the same concepts presented by both authors, such as identifying a need and creating a vision, are important for a leader to succeed. However, whereas Heifetz et al. (2009) presented principles that occur to varying degrees throughout the change process, Kotter’s (2012) process is more linear. That is, Kotter presents an eight-stage planning process for change including the following steps, which he refers to as accelerators: (1) establish a sense of urgency; (2) create a guiding coalition; (3) develop a vision and strategy; (4) communicate the change vision; (5) empower broad-based action; (6) generate short-term wins; (7) consolidate gains and produce more change; and (8) anchor new approaches in the culture (p. 23). Heifetz et al. promoted a concept of examining an organization from a higher point-of-view to identify patterns and work that is viewed as desired / undesired by employees, or even popular / unpopular ways to align its mission with the people as the ultimate starting place for strategic planning to achieve mission fulfillment. Once that higher-level analysis occurs, they suggest that leaders should empower their employees to implement the actual changes to advance and further elevate the organization’s mission (Heifetz et al., 2009; Kotter, 2012).

Heifetz et al. (2009) further argued that adaptive problems require a leader who has a vision for guiding employees to grow the institution, as opposed to using one’s authority for compliance to simply complete a task. There are systemic challenges that require cultural change such as innovation, honoring past traditions while building for a sustainable future, distributed governance in decision-making, active learning, and a commitment by all employees to allow sufficient time for change to occur. The authors stated that part of an executive team’s job is to identify the adaptive challenges and regulate the distress or uncertainty of implementing adaptive changes to the organization. While allowing employees to feel the urgency to change, the executive team must also guide the pace of the workflow and support employees through the
changes that will help the organization thrive. Within the context of accreditation, this means that rather than approaching the reviews as a compliance-driven activity separate from the institution’s operations, adaptive leaders shift their organizational cultures to approach accreditation as aligned with and part of routine activities and practices.

Kotter (2012) clarified that multiple stages of institutional accelerators can occur simultaneously, such as creating a guiding coalition (accelerator 2) concurrently with and to creating a sense of urgency (accelerator 1). Nonetheless, Kotter’s model is a more linear stepwise presentation than Heifetz et al.’s principles and Stephens’s framework of strategic planning, both of which are not presented as having an “order” or steps across a time continuum. As presented by Heifetz et al. (2009) and Stephens (2017), the frameworks become new cultural norms—innovative ways of approaching, developing, and implementing business protocols and thinking, as well as areas to consider concerning employees’ daily work and projects. The new norms are a direct result of the above authors’ continuous improvement models, which reiterates an integrated approach that takes into consideration and strives for organizational growth, with frameworks that can and are always moving together—much like the harmony of a high-performing jazz band. Each section must listen to and respond to the others, while also following the conductor. This approach also allows for improvisation when the unexpected occurs, or when growth opportunities arise.

In contrast, Kotter’s (2012) steps progress through an institutional process or project in a linear fashion, which implies that the steps will be abandoned once the project is complete. This often occurs when an accreditation site visit has been completed and an institution returns to “business as usual” instead of making adaptive changes throughout the process. By using Kotter’s framework as a guide, along with Heifetz et al.’s (2009) and Stephens’s (2017)
processes for adaptive and sustainable cultural change, the best of each of these approaches can be used to benefit organizations, as Standards for Accreditation include planning, evaluation, and improvement. Each of these pillars of the organizational framework will be investigated.

**Figure 1**

*Pillars for Continuous Improvement*

1. Planning
2. Implementation
3. Evaluation
4. Improvement
Chapter II: Literature Review

There are six sections in the literature review. First, I provide historical context of the accreditation movement in the U.S., along with a brief description of the seven institutional accrediting commissions that oversee accreditation for the USDE. Second, I explain the major causes for the increases in legislation surrounding accreditation in higher education that have resulted in more stringent compliance requirements. Third, I introduce Institutional Effectiveness (IE) as both a sub-discipline (a bridge between strategic planning, operational planning, and accreditation) and as a multiple measure of efficiency (including the language that each institutional accreditor uses for IE). Fourth, I outline some of the approaches that are used to increase quality and improve curricula within the U.S. and in other countries that have resulted in more foreign institutions applying for U.S. accreditation. I focus on how these methods improve stakeholder confidence in the process. Fifth, I provide a brief history and overview of the NWCCU. Finally, I explore what is required in accreditation reviews, as well as overview key institutional challenges such as how and why many university employees do not fully comprehend the requirements. Links are made between components of the theoretical framework, Bolman and Deal’s (2008) Four-Frame Model, and the NWCCU’s (2010) Eligibility Requirements and Standards for Accreditation including the importance of the institutions defining meaningful measures of accountability based on their mission and connecting meaningfulness of the process themselves as opposed to accreditation activities being seen as merely compliance oriented.

Brief History of Accreditation in the U.S.

Dating back to 1885, the American higher education accreditation system is believed to be the first accreditation system in the world (Prince, 2012). Hall (2012) stated that the original
purpose of accreditation in education was to strengthen the ability of students to transition between high school and college more seamlessly; however, accreditation at that time was conducted on a voluntary versus compulsory basis. The arch of the accreditation process includes data-gathering and evaluation by the institution that eventually is presented in the form of a written self-study. This self-study is followed by a peer review, which typically consists of a committee of external peer-reviewers from comparable institutions to the one under review (e.g., public vs private; and two-year vs four-year degree-granting institutions). In the case of the NWCCU, a staff liaison is part of the review committee. The NWCCU liaison is available to the committee to: (1) assist with fact-gathering such as providing access to previous accreditation reports, peer-evaluations, and letters of reaffirmation; (2) answer questions about the accreditation process, Eligibility Requirements, and Standards for Accreditation; and (3) act as a neutral party that both members of the institution and the evaluation committee can contact regarding the peer-evaluation criteria, site visit requirements, and follow up activities.

The peer-evaluation committee reviews the institution’s self-study and accompanying documents (such as appendices, course catalogs, student handbooks, and program pamphlets), along with the website content. The committee then conducts a site visit to gather additional information and insights from various stakeholders at the institution; these primarily occur through interviews and focus groups. Data and information are then triangulated by the committee members and formulated in a written peer-evaluation response that includes Compliments, Commendations, Concerns, and Recommendations.

Compliments are given when the Committee has identified areas wherein a college is performing at a high level. Compliments may rise to the level of Commendations in the peer-review report. Concerns are included when the Committee identifies areas that appear to be
below the level required to meet Eligibility Requirements or Standards or if the information provided needs additional clarity. Concerns may rise to the level of Recommendations in the peer-review report as either being significantly in compliance but in need of improvement, or as being out of compliance. Concerns and Recommendations should include citations for the Eligibility Requirement and / or Standards that they are associated with. The draft report is provided to the Institution wherein they may respond to “errors of fact” included in the peer-review and provide additional evidence to substantiate revisions to the draft before it is finalized. The final report is submitted to the NWCCU board of commissioners for review. In addition, a Confidential Recommendations meeting is held wherein the college or university president, along with institutional members selected by the president, may present additional information for further consideration by the NWCCU board of commissioners. At the conclusion of the meeting, the college’s team is informed whether reaffirmation has been granted. At this stage, preliminary feedback regarding Commendations and Recommendations is provided to the president. Final letters concerning reaffirmation may include changes in the exact wording of the decisions as determined by the board of commissioners.

The process of accreditation of institutions of higher education is the means by which the USDE provides academic quality assurance and transparency to the general public (Eaton, 2012; Ewell, 2011). Eaton (2012) stated that central to the process being successful is the freedom of each institution to be evaluated based on the institution’s mission including goals and objectives in relation to program delivery and other aspects such as the nature of its everyday operations and governance structure. Wergin (2005) emphasized that the required peer-review process must fairly assess the institution across the Eligibility Requirements and Standards, which is the framework by which colleges and universities are evaluated for quality and effectiveness.
To strengthen the peer-review process, the NWCCU created a series of rubrics for evaluating the Standards in draft form in 2016 to gather feedback and finalized the rubrics in 2019. The rubrics are provided to all peer-evaluation committee members and are reviewed during Evaluator Training provided by the NWCCU. Eaton (2012) further underlined that the process is formative and should focus on curricular and institutional continuous improvement.

Head and Johnson (2011) note that the USDE and Council for Higher Education (CHEA) recognize six institutional accreditation commissions as follows: Middle States Commission on Higher Education (MSCHE), New England Association of Schools and Colleges, Commission on Institutions of Higher Education (CIHE), North Central Association of Colleges and Schools, The Higher Learning Commission (HLC), Northwest Commission on Colleges and Universities (NWCCU), Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), and Western Association of Schools and Colleges (WASC) (p. 38). As the Western region has a separate commission for its junior colleges, the Accrediting Commission for Community Colleges and Junior Colleges (ACCJC), it would be more accurate to say that there are six institutional accreditation geographical areas—with seven commissions.

**Increase in the USDE’s Regulatory Authority**

Due to several factors including multiple stakeholder concerns about how institutions demonstrate academic quality, the USDE had the level of its oversight and regulatory authority greatly increased through the 2008 reauthorization of the Higher Education Act (Eaton, 2012). The top contributing factors that will be discussed in this study include: claims that World War II veterans had not received a quality education at various institutions across the nation; substantial increases in federal financial tax dollars allocated to fund education (Eaton, 2012; Hall, 2012);
and the 2005-2006 U.S. Secretary of Education’s Commission on the Future of Higher Education (i.e., the Spellings Report) call for increased institutional accountability to demonstrate clear evidence of student learning and transparency including requiring institutions to publish placement rates.

Accreditation processes in the U.S. were self-regulated until the 1950s when the federal government intervened to standardize how academic quality was determined (Hall, 2012). This change was due to numerous reports that post-World War II veterans were generally not receiving quality educational experiences using their GI Bill benefit. To specifically ensure that Korean War veterans received a quality education, the federal government began recognizing accredited institutions for GI Bill benefits in 1952.

Another element that resulted in increased federal regulation in accreditation processes was a surge of federal dollars to fund higher education. Though accreditation is often referred to by accrediting agencies as a voluntary process, it is a requirement for institutions of higher education to be able to offer federal financial aid and state funds to enrolled students (Schmadeka, 2012a; Sibolski, 2012; Head & Johnson, 2011). Wergin (2005) explained that these changes reflect increased accountability to the public including taxpayers, students, parents, and investors. Investors include alumni, grantors, philanthropists, and businesses whose contributions often help fund a university’s operations and scholarships. In 2011, the USDE National Advisory Committee on Institutional Quality and Integrity (NACIQI) reported that in 2009 alone, $175 billion was spent on the federal investment in U.S. higher education (Sibolski, 2012). Sibolski also suggests a direct relationship between the increase in public taxpayer dollars to fund higher education, greater public scrutiny, and higher accountability to the USDE.
Wergin (2005) reported an increase in Congressionally mandated accreditation standards beginning with the 1992 extension of the Higher Education Act “checklist” followed in 1998 with an extension of the Act which added student learning outcomes (SLOs) as a requirement for accreditation reports. In 2005-06, Ewell shared that the Spellings Commission report called for heightened attention to provide more substantial and meaningful evidence of student academic achievement and evidence of an institution’s continuous improvement processes (Ewell, 2011). Hall (2012) echoed the above sentiment, noting that most accreditation processes had noteworthy deficiencies including perceptions among multiple stakeholders regarding lack of institutional accountability, uneven academic quality, and challenges with transparency (e.g., an institution failing to regularly publish demonstrable evidence of student learning, and graduation rates). As an outcome, the report called for major changes in the overall accreditation process. The Spellings Report also implied that accreditation stifled institutional innovation. In all, prospective students expect academic quality and assurance regulations in the institutions they are considering attending to ensure they receive a quality education that prepares them for the demands of their profession and the workforce. Through meeting institutional accreditation Standards, prospective students, parents, and community members can be assured that institutions have met rigorous standards of academic quality and effectiveness.

**Institutional Effectiveness**

By 1990 all seven institutional accreditation commissions utilized institutional effectiveness (IE) and accountability measures as part of their criteria and provisions for ensuring continuous improvement of colleges and universities (Paton et al., 2014; Ewell, 2011; Manning, 2011; Head & Johnson, 2011). According to Ewell (2011), IE is different from assessment in that the latter is used to evaluate a specific area or strategy. IE is meant to be
applied to all facets of an institution’s operations and evaluate the effectiveness of the institution at large. Manning (2011) suggested that effective institutions generally collect and use quantitative and qualitative data, as well as assessment and evaluation results, to inform programs, services, and an institution’s overall quality improvement.

Head and Johnson (2011) stated that successful institutions “use the accreditation process to provide a framework for strengthening the effectiveness of programs and services” (p. 1). Although there is no singular definition for IE, Manning (2011) added that a high proportion of colleges have received recommendations in IE areas such as regular and systemic assessment of SLOs and continuous institutional improvement. Head and Johnson (2011) explained that the term IE arose through accreditation efforts as a way to communicate the connection between strategic planning, operational planning, and accreditation activities.

The roots of accreditation began with the drive among faculty to ensure quality in education and continuously improve programs (Eaton, 2012; Ewell, 2011). Head and Johnson (2011) argue that these guiding elements of quality and continuous improvement should remain the core principles of accreditation as articulated through the Standards including specific language in terms of the use of the information for continuous improvement, which is included across all seven institutional accreditation commissions. Within the accreditation evaluation process, three topics are central across all commissions when evaluating institutions: (1) mission articulation, (2) planning with intentionality for improving student learning, and (3) evaluating evidence of student learning.

Head and Johnson (2011) added that across all the institutional commissions, IE and SLOs are evaluated for a focus on continuous improvement and offer the following insights from each of the commissions:
1. Middle States Commission on Higher Education (MSCHE) (2009): the process is adaptable based on the institution’s mission, goals, and resources.


6. Western Association of Schools and Colleges (WASC), Accrediting Commission for Community and Junior Colleges (ACCJC) (2010): institutions are expected to utilize quantitative and qualitative data as evidence for continuous improvement.

7. WASC, Senior College and University Commission (WSCUC) (2010): institutions are expected to utilize quantitative and qualitative data as evidence for continuous improvement.

**Quality Assurance and Continuous Improvement**

Prince (2012) stated that U.S. accreditors must centrally focus on the continuous improvement of institutional-related practices under review to ensure that quality education is delivered to all students. The improvement process includes institutional planning of outcomes, collecting relevant data, evaluating outcomes, and using the results to inform future changes to
programs and services. Accreditors evaluate the assessment of student learning and institutional effectiveness to ensure academic quality and continuous growth. Sibolski (2012) notes that USDE accreditation represents quality assurance, provides public confidence, and increases the ability of students to transfer among institutions. Because of the USDE assurances, Prince (2012) argued that greater numbers of international institutions are turning to the U.S. institutional accrediting commissions to seek recognition and accreditation status. In addition to increased portability of degrees with U.S. accreditation, having the designation of quality assurance is seen as a status symbol due to the focus that most U.S. institutions of higher education have on assessment and continuous improvement.

Assessment conducted for the improvement of educational outcomes is distinctly different in approach, process, and results than when it is conducted solely to maintain accreditation status (Schmadeka, 2012b). Schmadeka presents Allen’s (2004) argument that academics have a tendency to participate in a significant amount of assessment and can become mired in data and creating improvement strategies without a clear plan. Though continuous improvement is just one of the key purposes of accreditation, it is also time-sensitive given the timing of accreditation cycles. Therefore, Schmadeka argues that when an institution’s accreditation status is at stake, it is not the time for faculty to engage in laborious evaluation; instead, the main purpose is to maintain accreditation through regular assessment and planning. Consequently, if an institution does not maintain systemic and systematic assessment practices, the accreditation process can be rushed, feel burdensome to its employees, and lack meaning to the college and its stakeholders. Educational assessment should thus be approached through an iterative process that collects and evaluates data specifically to improve learning, whether proscribing to William’s (2008) four-step process or Banta’s (2004) adaptive approach, which
places assessment practices contextually within the institutional mission and goals. Banta’s approach identifies three phases: (1) planning, implementing, and improving and sustaining; (2) stakeholders’ engagement, and (3) includes clear objectives with time for development, “educational assessment is an iterative, data-driven process that is intended to improve learning” (p. 3). These phases and requirements are evaluated across all seven institutional accreditation commissions Standards for Accreditation.

According to Spangehl (2012), the Higher Learning Commission (HLC) is the only institutional accrediting commission that offers alternative pathways for reaffirmation of accreditation using the Academic Quality Improvement Program (AQIP). In AQIP, planning is carried out through a framework that includes planning, implementation, checking results, and modifying for improvements, which is referred to as the Plan-Do-Check-Act (PDCA) cycle. This process provides a culture of continuous quality improvement while ensuring that the institutions still meet baseline standards. The process uses a Systems Portfolio and index to provide early insights when an institution’s practices and documentation may not sufficiently demonstrate compliance with the published standards. The AQIP Systems Portfolio also provides institutions the ability to proactively address their methodologies for measuring academic quality and SLOs. Other components of the program include Strategy Forum, Action Project, and Quality Checkup. The reaffirmation process is designed to synchronize the formative processes and summative process.

**Brief History and Overview of the NWCCU**

According to the NWCCU *Handbook of Accreditation* September 2020 Update, the agency was originally founded in 1917 as the Northwest Association of Schools and Colleges Commission on Colleges and Universities. In 2002, secondary schools separated from the
organization, and the agency was renamed the NWCCU. The private 501(c)(3) non-profit corporation oversees institutional accreditation in Alaska, Idaho, Montana, Nevada, Oregon, Utah, Washington, and a few institutions in British Columbia, Canada. In addition to the NWCCU staff, the organizational governance structure also includes three standing bodies: (1) a Board of Commissioners comprised of a president, chair, and commissioners; (2) the Substantive Change Committee (SCC) that reviews proposals of significant change; and (3) the Policies, Regulations, and Financial Review Committee (PRFR) that evaluates and makes recommendations on institution’s Year Six PRFR report.

There are three types of accreditation: (1) institutional, which assures that the institution as a whole meets or exceeds the Standards for Accreditation; (2) programmatic, which accredits individual programs based on program-specific standards (e.g.: nursing, engineering, physical therapy), and (3) national, which accredits institutions that commonly have a singular focus (e.g.: information technology, business, art, faith-based). Historically, institutional accreditation was referred to as regional accreditation and the agencies were referred to as regional accreditors. On July 1, 2020, the USDE eliminated the regional designation in favor of the institutional designation. The NWCCU is a voluntary, non-governmental agency that has been authorized by the USDE as a nationally recognized institutional accreditor of postsecondary institutions offering programs of one academic year in length or longer since 1952. In 2018 both the USDE and the Council for Higher Education Accreditation (CHEA) reaffirmed the NWCCU as a reliable authority concerning educational quality. However, the NWCCU does not have any regulatory control or oversite of or for state and federal governments, programmatic or national accreditations.
Perceptual and Procedural Challenges of Accreditation

During the NWCCU 2017 annual meeting, the Commission specifically designed breakout sessions by key topics to encourage conversation among participants. The topics included planning and transparency around the accreditation process, assessment, and SLOs. It also included discussion about why employees at colleges and universities are often unclear about the process, purpose, and requirements (NWCCU, 2017). To facilitate this event, the NWCCU had a facilitator and designated note-taker scribe notes on easel pads at the front of the room to increase transparency and member engagement. During the sessions, most members expressed uncertainty regarding the reporting requirements, challenges in how to evaluate and report on SLOs—specifically citing that most faculty do not have sufficient time or resources to do this work well. Additional confusion was expressed among participants regarding the newly adopted rubrics and how evaluators are or are not to use them during site visits. Members also questioned the timeline for reporting and expressed frustrations with not knowing who their college representatives should contact at the NWCCU as questions arose. Additional concerns were expressed regarding the amount of resources that colleges are expending to meet accreditation requirements (P. Goad, V. Martinez, & L. Steele, personal communication, December 5, 2017).

Employees at the University of Houston-Downtown experienced similar uncertainty regarding the assessment of their program SLOs following a 2006 accreditation visit. The faculty, staff, and administration described recurrent rounds of recommendations on assessment practices that spanned four years. The college employees further stated that the guidance from the accreditors appeared to be undefined (Schmadeka, 2012a), demonstrating that the lack of clarity regarding the purpose of SLOs crosses regions. Baer (2017) presented a summary of
topics that Ewell had previously provided in his 2001 report, *Accreditation and Student Learning Outcomes: A Proposed Point of Departure*, with questions centered on what constitutes a student learning outcome (SLO), how and to what level SLOs should be evaluated, and how accreditors will evaluate SLOs. Moreover, even though Ewell posited his questions in 2001, Baer noted that 16 years later, U.S. colleges and universities, institutional accreditors, and the USDE were engaged in the same discussions regarding measuring and sufficiently reporting on SLOs, thus confirming that bewilderment and a lack of clarity still abound about the process and requirements.

Head (2011) argued that “*assessment* [italics in original] and institutional effectiveness are broadly and often contradictorily defined” (p. 9). Schmadeka (2012a) claims that the lack of clarity between assessment and IE activities makes inefficient use of institutional resources. That is, unclear expectations from leaders often translate to work being performed that does not provide the information that evaluators need, yet these efforts require human resources, equipment, and financial investments. Head and Johnson (2011) argued that compliance reporting is viewed by many institutional employees as a resource detractor or a box that must be checked off a long checklist, instead of seeing it as something that can help provide a framework and logic model for resource alignment and allocation, which is the intent of institutional effectiveness. Stephens (2017) performed a yearlong study during which he visited several universities that were reviewing their strategic plans. He suggests that institutional leaders who ensure the alignment of resources including money, people, time, space, technology, data, and policy with the strategic plan operate more efficiently and complete more of their activities. All must also align with accrediting bodies’ general concept of institutional effectiveness.
In their work on organizational frames, Bolman and Deal (2008) describe their Four-Frame Model as containing perspectives or lenses that represent different aspects of an organization: structural, human resource, political, and symbolic. These perspectives also align with the concepts of institutional effectiveness and accreditation. While all of the perspectives are in play at all times, the first two that Bolman and Deal (2008) use to describe the frames line up with the *Eligibility Requirements and Standards for Accreditation* (NWCCU, 2010a) that are required by the NWCCU. The first lens is the central concept and includes policies, relationships, organizational politics, and culture / meaning; the second is basic leadership challenges, which include structural, organizational / human needs, personal agendas / power dynamics, and meaning. The third and fourth lenses often manifest during site visits: metaphor and image of leadership. The metaphor lens includes factory, family, jungle, and theater, which is evident when college employees band together in preparation for and during an accreditation site visit. The image of leadership lens, which includes social, empowerment, advocacy, and inspiration, is also critical. The leadership challenges lens also aligns with Heifetz et al.’s (2009) theory of adaptive leadership. Heifetz et al. (2009) argue that strategic and lasting change requires leaders to know when to use adaptive leadership and when to use technical solutions. Successful implementation of strategic plans for mission fulfillment requires adaptive and technical solutions to align resources, with meaning, which ultimately leads to cultural change and institutional improvement.

Culture and meaning are also central to Bolman and Deal’s (2008) Symbolic Frame. Within this frame, leaders focus on the vision to convey the importance of the work of the organization and the personal work of individual employees in contributing to that work, as well as inspiration, and engagement to create cultural change. Institutional leaders also understand the
importance of goal setting as part of clearly defining what is meaningful to their institution to fulfill their mission. Meaning / meaningful is further identified in the NWCCU’s Accreditation Handbook (2020) 31 times across descriptive narratives, Standards, report guidelines, and rubrics. For example: Standard 1.B.2, meaningful goals, objectives, and indicators; 1.D.2 and 3, meaningful data categories and indicators to promote student achievement and close equity gaps; and 2.E.2, meaningful opportunities for stakeholder participation in financial planning. Organizations ideally will make meaning of the process by constructing and documenting evidence of their culture through their routine rituals and evaluation processes.

A central tenet of the purpose of accreditation across all seven of the institutional accreditors is to allow each institution the flexibility to represent their organization’s mission, values, programs, and communities (Paton et al., 2014; Eaton, 2012; Head & Johnson, 2011). Paton et al. (2014) held a panel interview with the presidents (and one designated vice president) of the commissions, during which four themes arose: (1) mission and goals; (2) educational programs and student learning; (3) institutional effectiveness; and (4) faculty scholarship. In response to these themes, Elman, president (retired 2017) of NWCCU offered these responses: the people within the institutions determine mission and goal; civic responsibility is part of academia; institutions select objectives and indicators to determine mission fulfillment; and the Commission does not determine what faculty service and engagement are, as those criteria are determined by the institutions.
Chapter III: Methods

Study Design

This study primarily employed grounded theory (Glaser & Strauss, 1967) to discover the experiences, perceptions, and potential solutions to the research question through an iterative data collection and analysis process. According to Martella et al., (2013), while quantitative researchers often use a priori approaches and form hypotheses from theories through deductive reasoning, qualitative researchers form research questions for the basis of their studies without predetermined hypotheses. Grounded theory studies phenomena from a systematic perspective wherein data are collected through qualitative means such as observation, interviews, and field notes or written accounts from site visits (APA, 2003). Starks and Brown Trinidad (2007) add that the researcher conducts the interviews to obtain the experiences and stories of the participants through active listening. These data are then analyzed through inductive reasoning to determine the next round of research, continuously moving towards a theory (Rieger, 2018; Martella et al., 2013; Starks & Brown Trinidad, 2007). The theory is considered to have emerged when a level of saturation has occurred in the research such that additional information will not add more to substantiate or refute the theory (Martella et al., 2013).

Rieger (2018) and Martella et al. (2013) argue that participants’ perspectives are an important aspect of grounded theory, as people are presenting their realities from their standpoints. I employed a grounded theory approach to illustrate the perspectives of various institutional leaders including administrators and faculty, and commission staff in the NWCCU region regarding their experiences with and perceptions of the process and requirements associated with institutional accreditation. The focus of the study was to identify emerging themes that arose from the perspectives of the institutional administrator and faculty participants
garnered through interviews and focus groups. The goal was to gather their insights regarding how the accreditation process could be improved with foci on efficiency, effectiveness, and more meaningful and direct impact to the institutions.

**Instrumentation Protocol**

The heart of grounded theory is a methodological approach wherein iterative rounds of data collection and analysis occur—with each informing the next—and is centered on interviewing participants (APA, 2012). Open-ended questions are utilized as part of the inductive analysis process through which categories, dimensions, and interrelationships are discovered (Martella et al., 2013). The process for this study included two procedural rounds of focus group and interview protocols. Participants selected the preferred modality for their interviews, which were in-person, virtual, telephone, or email. Participants also self-selected whether to participate through a focus group or one-on-one interview.

**Round One**

Initial formative interviews were conducted to inform the development of the instrument that was used in the second round of interviews. A total of nine individuals were contacted in-person across multiple conferences to participate in the initial round that took place during November 2019. The initial round of interviews was conducted in person through one-on-one interviews (67 percent) and focus groups of four or fewer participants (33 percent). One-on-one interviews lasted 15 – 20 minutes; focus groups lasted 20 – 30 minutes. Participants self-selected into focus groups. For both the one-on-one interviews and focus groups, a brief presentation of the study was provided to the participants at the beginning of the meeting. Then, the participants were asked an open-ended question, “Based on the purpose of the study, what questions and / or topics would you suggest be included in the second round of interviews and focus groups?” Field
notes were taken and reviewed with the participants at the end of the meetings for member-checking. The results were analyzed for emerging themes and used to inform the development of the instrument used in the second phase of interviews.

Round Two

Individuals were initially contacted in person across multiple conference venues regarding possible inclusion in this study during November 2019. A brief description of the study was provided including the premise, the research questions, and that the study would be conducted via grounded theory with the questions for the second round emerging from the participants of the first round. Following the conclusion of round one, emails were sent to 16 college leaders (administrators and faculty) to invite them to participate in the second round, which took place from December 2019 – March 2021.

With the timing of the winter holidays, followed by the COVID-19 pandemic, the second round of interviews were conducted primarily (79 percent) via email; 21 percent were conducted via a virtual meeting; and none were held via telephone or in-person. The virtual interviews were scheduled to last between 60 and 90 minutes and were recorded and transcribed with the participants’ permission. Field notes were reviewed with the participants to ensure that their ideas were accurately represented at the end of the interviews. Interviewees were also provided an opportunity for offering additional comments and insights. The email interviews did not require transcription because the participants submitted their open-ended responses to the open-ended question in writing.
Sampling and Participants

Sampling

Purposeful sampling involves selecting specific people, events, or settings based upon relevance to the study (Martella et al., 2013). A purposeful sample of leaders who represent U.S. colleges and universities overseen by the NWCCU commission were included in this study. To gain more recent perspectives, the first inclusion criterion applied to the list of institutions in the NWCCU’s region was limiting it to those colleges and universities that had site visits in 2018, 2019, or 2020. From this list, individuals were approached in person during November 2019, across multiple conferences, for possible inclusion in the study. The original intent had been to interview six individuals in each round. However, when I approached people at conferences related to accreditation based upon the institutional name on their name badges (as opposed to seeking specific people out) to create an element of randomness, discussions resulted wherein a larger pool of people whose institutions fit the criteria agreed to participate.

Increasing the number of participants provided for a richer, broader dataset, which was a welcome outcome. The study included individuals representing two- and four-year institutions from both the public and private sectors residing in four states: Nevada, Oregon, Utah, and Washington. Additionally, two members of the NWCCU senior leadership team were interviewed. Thus, a total of 25 individuals participated in this study between November 2019 and March 2021. See Table 1 (Appendix A) for a list of institutional participants.

Participants

Colleges and university participants included practitioners in the following roles: ALOs; presidents; vice presidents, deans, directors, and faculty of various disciplines; and accreditation evaluators. Some of the disciplines that the participants currently or have worked in previously
include career and technical education, general education, institutional research, assessment of student learning, curriculum development, student services, and institutional effectiveness. Many participants have also served on and chaired accreditation steering committees, been the primary authors of accreditation reports, contributed to or edited accreditation reports, as well as served as NWCCU accreditation evaluators, and NWCCU Mission Fulfillment Fellows. Participants have served in their current roles for two or more years and 86 percent served in one or more roles prior to receiving promotions into their current roles. Forty-eight percent currently or have previously served as faculty. Sixty-five percent of participants have worked in higher education for 10 – 19 years, and 14 percent for 20 or more years, indicating a breadth of perspectives acquired through different roles they have held in higher education and a demonstrable wealth of expertise.

Each of the above roles is critical to mention, as they all function together to complete the work for ongoing institutional accreditation in an effective, efficient, and meaningful manner. The ALOs are the liaisons between the institutions and the accreditors and are responsible for knowing and understanding the Eligibility Requirements (ERs) and Standards required by the NWCCU to stay in compliance, the submission of all required reports and the logistics related to site visits. The administrators of an institution work together to ensure mission fulfillment and determine short- and long-term strategic and operational planning. Faculty develop and deliver course and program curricula, assess student learning outcomes (SLOs), and make curricular improvements based on SLO data. Accreditation evaluators investigate and evaluate institutional data, information, policies, and procedures to determine compliance with ERs and Standards. The NWCCU is directly responsible to the USDE for institutional accreditation.
Strengths of Design

Starks and Brown Trinidad (2007), Martella et al., (2013), and Rieger (2018) share that the use of inductive reasoning applied to the research gathered from the participants to determine successive rounds of research adds strength to grounded theory as a qualitative research method. For this study, having a strong cross-section of institutional administrators and faculty participate in both rounds, including the different types, sectors, and multiple states increased the generalizability of the research. Additionally, having the questions for the second round of interviews emerge from the subject matter experts in the initial round of interviews also reduced potential personal biases that I may have brought into the study. That is, the questions came from the participants as opposed to being developed a priori by me. This approach further strengthened the overall design of the instrument by pooling the knowledge of a greater number of subject matter experts, thereby, increasing the depth and breadth of perspectives and areas represented in the instrument in meaningful ways, and reducing the potential for participant bias in the findings as research was analyzed by themes. This approach also created greater support and engagement from the colleges at large that have individuals that participated in the study.

Limitations

Impact of the Pandemic

The second round of interviews began in December 2019 and was limited due to the holidays, institutional closures, and employees’ vacations. This was followed shortly thereafter by the COVID-19 pandemic. The impacts of the coronavirus and people working from home resulted in a complete shift from 100 percent of the round one interviews being conducted in-person, to 100 percent of round two interviews being conducted remotely via email, or virtually.
The pandemic also resulted in delays in the second round of interviews, as most faculty and administrators were working to address various immediate challenges including: curricular changes to online modalities; safety for the students and employees; and decisions, guidelines, equipment, and security platforms to allow employees to work remotely. More pandemic-related delays occurred as reductions in enrollments resulted in budget cuts with layoffs and non-renewal of personal contracts, thereby changing the workload of the remaining employees.

The second round of interviews was originally scheduled to be administered over three months. Due to delays with the pandemic, the second round ended up taking 15 months to complete. The pandemic also changed the number of participants in totality, as some of the individuals who participated had intended to have me visit their institutions and hold focus groups with their accreditation committees and faculty groups; two individuals were not able to participate due to personal and work-related issues. Additionally, due to COVID-19, my original plans to go to the NWCCU office building to engage with more NWCCU leaders had to be modified, which resulted in a smaller pool of available participants. Thus, the primary focus in the findings section is on the higher education faculty and administrators.

**Researcher’s Experience**

Another consideration is my professional experience. I have worked in higher education in the area of institutional effectiveness for over 20 years. During this time, I have served on several accreditation committees, as an accreditation liaison officer, and as an accreditation evaluator. As part of this work, I have attended numerous NWCCU events over the years including annual meetings, annual conferences, the Demonstration Project Summit, and training / workshops for accreditation liaison officers, comprehensive Year Seven self-studies (Evaluation of Institutional Effectiveness, and Mission Fulfillment and Sustainability reports), Mid-Cycle
Evaluation reports, and evaluator training. I have also served as a NWCCU evaluator during site visits.

Because of the length of time, and activities that I have been engaged in that are associated with accreditation, I know or have met some of the individuals who participated in this study. To minimize potential bias, instead of reaching out specifically to people that I know to participate in the study, I set two specific sets of criteria for a purposeful sample: (1) on the institutions based upon their most recent Year 7 site visit; and (2) utilized multiple conferences related to accreditation to recruit individuals that met the first criteria. This approach allowed for some randomness within the criteria based upon the individuals that the institutions decided to send to the events, as well as being limited by whom I was able to speak with during breaks.

Additionally, my background in accreditation presents the possibility of bias based upon my own experiences and perceptions of the accreditation process. To minimize the impacts described above, grounded theory was utilized with two rounds of interviews. The first round included one open-ended question, “Based on the purpose of the study, what questions and/or topics would you suggest be included in the second round of interviews and focus groups?” The framework for the second round of interviews emerged from themes of the first round of interviews.

**Institutional Review and Protection of Human Subjects**

This study was approved through the University of Washington Institutional Review Board for the Protection of Human Subjects process as an exempt study on October 9, 2018. The individuals interviewed participated on a voluntary basis; are all adult professionals who are deeply vested in this work; had the ability to self-censor and or not respond to any question at
their discretion; and participants also had the opportunity to review their comments and offer corrections if I made any errors or inadvertently misrepresented their perspectives.

The questions in the study were intended to collect information regarding the participants’ perspectives regarding ways to improve the process of institutional accreditation specifically for greater efficiency, effectiveness, and meaningfulness for the colleges and universities. The topics, therefore, minimized disclosure of sensitive or personal data. An informed consent letter describing the purpose of the study, as well as the benefits and risks, was provided to and signed by all participants. The data were classified as Level 1 with little or no risk. Internet-based servers or storage systems were not used for this study.

**Pseudonyms and Gender-Neutral Pronouns**

To provide an additional layer of anonymity for the participants, pseudonyms and gender-neutral pronouns were used for all references to participants. Pseudonyms were not assigned based upon how an individual identifies. Therefore, there is no correlation between a pseudonym and how a person refers to themselves.

The gender-neutral pronouns used in this study follow the guidelines set by the American Psychological Association (APA, 2019) as follows:

- Ze: he / she / they
- Zir: him / her / their

**Data Collection and Analyses**

Data sources included interviews with 23 participants from NWCCU member institutions and two senior ranking NWCCU staff members. Additional guiding documents included the September 2020 *Handbook of Accreditation* and the 2010 *Eligibility Requirements* and *Standards for Accreditation* published by the NWCCU. The first round of data were collected
primarily through my own typed note-taking during the interviews. The notes were reviewed orally with the participant for corrections, then the participant was offered an additional opportunity to review the notes for corrections and/or to offer additional insights at the end of the interview. The second round of data were collected primarily through email wherein the participants’ submissions acted as the transcription.

Grounded theory method requires a minimum of two passes of coding. The data were coded and analyzed into categories based on groupings and repeated concepts that arose across the interview transcriptions over several iterations. The first set of coding, referred to as initial coding (Charmaz, & Liska Belgrave, 2015; Saldana, 2016; Liska Belgrave, Seide, 2019), was performed line-by-line to produce analytic leads and provisional categories. Due to the number of transcriptions and amount of data contained therein, the initial coding produced 35 key codes. One aspect of initial coding is recognizing properties and dimensions of categories for further reflection and scrutiny (Saldana, 2016). Charmaz and Liska Belgrave (2015) add that this step helps the researcher identify meaning within the categories.

Focused, axial, and theoretical coding are all highly accepted secondary grounded theory methods of coding (Saldana, 2016). However, Saldana also reports that Charmaz (2014) perceives axial coding as “cumbersome” and argues that it may impede research progression. Instead, focused coding is preferred to allow for greater reflection, comparison, and precision (Charmaz, & Liska Belgrave, 2015; Saldana, 2016; Liska Belgrave, Seide, 2019). For this study, I employed focused coding for the secondary coding, which identifies the most “significant” and “salient” codes in the data corpus (Saldana, 2016). As this activity also allows the researcher the ability to recognize codes that are redundant and merge similar codes (Charmaz, & Liska Belgrave, 2015; Saldana, 2016), the codes were reduced and refined through these analyses. The
results were triangulated with the data collected through other parts of the study (e.g., the perspectives of the participants based on their respective institution type, the participants’ roles within their institutions, and the length of time they have served in higher education) to ensure that perceptions were being presented by participants from different types of institutions and across various roles to support or refute emerging themes and further hone the results. Finally, theoretical coding was applied to integrate and synthesize (Saldana, 2016) categories previously developed to present the meanings of participants experiences (Charmaz, & Liska Belgrave, 2015) through four themes that emerged from and are, therefore, grounded in, the data.
Chapter IV: Findings

The purpose of the study was to learn from the experiences and perspectives of the participants how the process of accreditation could be improved to increase efficiency, effectiveness, and bring more meaningful, relevant, and value-added benefits to the institutions. The following section includes the findings with quotes from the second round of interviews of the study. Themes arose from the participants responses that fell into the following categories: (1) continuous improvement cycle; (2) perceptions of the Standards for Accreditation; (3) professional development and training; and (4) planning and structuring meaningful site visits.

Continuous Improvement Cycle

The Continuous Improvement Cycle (CIC) is meant to provide institutions of higher education with a framework to align their everyday practices with a regular, systematic process to improve the quality of their programs, institutional effectiveness, attainment of strategic goals, and mission fulfillment.

“The basic framework for accreditation,” Brit stated, “follows a pretty standard institutional effectiveness cycle—planning, implementation, assessment, continuous improvement—and generally I think that is a good approach.” Sarah added, “I would say that my experience with the Standards as a framework of defining mission fulfillment, [and] planning to deliver on mission fulfillment at a satisfactory level. Implementing that plan, assessing the results, and engaging in continuous improvement is mixed.” In regard to zir recent comprehensive self-study, Brit reported:

Overall, I felt the accreditation process was valuable to the college I am at and helped us to recognize some areas that we can improve upon. It also created the accountability we needed to make a few changes that might not have been done (or as quickly) without it.
Several participants expressed strong sentiments that the Standards provided a sound framework and rationale for commitment vs. compliance reporting. Forthrightly, Sarah shared:

> Having accreditation Standards that require this activity can be helpful for overcoming resistance, but often the result isn’t a motivated engagement with the planning→ assessment→ improvement cycle with the goal of improving [the institution’s] performance, but rather an exercise in figuring out what story we can put together to satisfy the evaluators and commission.

Sarah’s experience captures and portrays stories shared by several participants wherein institution personnel respond to reporting requirements as the submission deadlines draw closer as opposed to integrating them into college planning at the forefront. The result is two-fold: (1) people know that the work must be done to maintain accreditation status, thereby affording the college the ability to offer financial aid to students; and (2) accreditation is commonly referred to as a “stick,” which leads to forced engagement with those activities. Moreover, the restricted resources that the majority of colleges operate under results in colleges completing the reports under less-than-optimal conditions (e.g., lack of resources including time, office space, funding for personnel, and adequate software and technology infrastructure) as described by Stephens, (2017) and Immordino et al., (2016).

**Planning**

Participants’ experiences and insights in the area of planning distinctly fell into two approaches: disparate-compliance or integrated. A strategic plan typically includes the organization’s mission, vision, values, strategic goals, objectives, and indicators. In regard to accreditation, disparate-compliance planning occurs when an institution develops and maintains its strategic plan independent from accreditation requirements (Brodnick & Norris, 2016).
Hence, accreditation reporting, and all of the activities required to meet reporting requirements are handled separately as an additional set of compliance reporting. With integrated planning, the institution aligns and embeds accreditation requirements directly within the institution’s strategic plan. For example, in the NWCCU’s 2020 Standards, Standard 1.C addresses Student Learning. As institutions of higher education, student learning is the primary reason for colleges and universities to exist. Therefore, having student learning included as a strategic goal, would align with the institution’s mission (Standard 1.A.1) and the reporting requirements set forth by the USDE that are overseen by the institutional commissions (e.g., NWCCU).

**Disparate-Compliance Approach.** Sarah’s thoughts tie in with a recent experience that Peggy shared following zir college’s Year Seven report, stating, “the institution seemed focused on showing we had stuff rather than actual planning.” Similarly, John noted, “many people see accreditation as a layer on top of what we are already doing.” Sandy clearly expressed that “People at the institution don’t understand accreditation. They think of it as an overlay.” Part of the issue here is that when colleges approach accreditation from a compliance purview, the reporting and activities are perceived as compulsory as opposed to goals that the institution has developed for itself. As a result, college personnel are often scrambling to respond to the prompts set forth in the Standards when reports are due. Because this work is viewed as compliance it can also be viewed negatively. Natalie reported that at zir institution:

> Accreditation felt like a heavy lift ON TOP OF the other processes we were doing, instead of complementing each other. There was a general sense around the college of Accreditation being “a thing the college had to get through” rather than an integrated part of our normal processes.
Peggy experienced a similar phenomenon at her college saying, “The Standards could have been helpful in clarifying planning, but [college] leadership did not use them in this way.”

Likewise, Sandy acknowledged that, “People that were doing the strategic planning didn’t know how to do strategic planning or how to tie it to operational planning or accreditation.” These experiences clearly demonstrate a lack of clear connections between college planning and accreditation and are an example of non-adaptive leadership. Regarding situations like these, Sarah observed:

If the institution focuses on producing reports to convince the accreditor that we meet Standards, and between self-study development rounds it doesn’t focus on improving its results, then the accreditation Standards and evaluation process will have limited impact. Accreditation viewed as a compliance exercise is a tragic waste of resources that only achieves a certification of minimally acceptable performance for credit transfer and Title IV eligibility.

Although the institutional accreditors frame the Standards for the colleges and universities that they oversee, the commissions cannot control the extent to which those institutions utilize the frameworks to support the work of the organization. “Part of this is on the college,” Natalie said, and elaborated, sharing the College’s recent experience:

At the end of our 7-year cycle, we were getting there. There was a roll-up from our strategic planning into the core themes. From my observations, we are currently working towards an even more integrated approach, doing the mental work to connect the overall planning we do with mission fulfillment and student success.

The events shared by the participants clearly demonstrate that college personnel are experiencing a lack of clarity / misalignment of institutional activities (Schmadeka, 2012a).
Further, for many, the misalignment skews Kotter’s (2012) sense of urgency to a negative frame and prevents the rest of Kotter’s accelerators from occurring (e.g., guiding coalition, develop vision and strategy, communication, broad-based actions, etc.) Additionally, misalignment means resources are not being used efficiently (Stephens, 2017; Immordino et al., 2016).

**Integrated Approach.** Regarding an integrated approach to planning, Brit emphasized, “The more that can be done to allow colleges to integrate the Accreditation process and their institutional strategic planning and resource allocation processes into the same effort, the better.” Stacy concurred, offering the following, “Tying accreditation processes into other institutional planning processes will allow members of the campus to see the connections and relevance of accreditation. Strategic planning particularly, should inform and be informed by accreditation.”

Adding to this line of thought, Sarah explained:

> At their best, strategic planning for an educational institution and the Standards of the accreditor both promote continuous improvement, but in practice, both can devolve into defensive assertions that the goals / Standards have been achieved and we can rest on our laurels. To avoid this fate, an institution needs to believe that it has identified the activities and resources that most contribute to achieving its intended educational outcomes, has a clear assessment of how well those outcomes are currently being achieved, and is committed to constantly working to improve upon its current level of performance.

Along this same line of thought, Jay stated:

> To increase efficiency: The accreditors can find a way to better use and review the planning documents that an institution uses (e.g., institutional master plans, budget plans,
strategic plans, and work plans) with period [sic] submissions (potentially in Year Three and Six in the NWCCU structure).

To increase effectiveness: Having clearly defined prompts about what matters would be useful and important in pairing with the efficiency piece. Some institutions have ineffective, elaborate systems, and others have effective simple systems and everything in between. Better clarity about what is necessary to meet the Standard would improve the effectiveness of college’s work and reporting. This guidance should align with the other elements of the accreditation framework. For example, “How does your institution’s planning process promote continuous improvement at the College?”

Peggy echoed these sentiments saying, “Require clearer explanations of how data informs planning, informs budget, etc.” Additionally, ze added, “It would be good [for NWCCU] to require [institutions] to identify our strategies” and suggested that using a “logic model” might be helpful. The thought of a logic model was echoed by other participants as well with some saying that they have designed and used logic models as part of their planning. Other participants requested that NWCCU provide template options that colleges could use and modify if they do not have logic models of their own or need help designing them. Moreover, Jay offered:

A simple set of Standards / questions that could be used for every institutional-level plan to help colleges in the design and implementation of the plans could promote alignment and meaningful work. For example, how does this institution know that this particular plan is (a) being well implemented, (b) using meaningful assessment and evaluation data to promote continuous improvement?

Sarah presented a final thought:
I spend a fair amount of time in my planning role trying to support strategic plan goals and objectives with commitment to ongoing metrics-based performance management tied to regular review of results, planning next steps to improve results, implementing those steps, and reassessing after implementation to see what is working. The same is true of accreditation Standards. If an institution is genuinely focused on continuous improvement, is interested in receiving constructive recommendations through the process, and will be forthcoming about its current challenges and limitations, then providing evidence that it is meeting the accreditation Standards is an easy lift.

**Evaluation Challenges**

In terms of evaluation, participants reported that two areas arose as challenges: (1) the assessment of student learning outcomes (SLOs), which will be discussed here; and (2) the new requirement in the 2020 Standards to compare disaggregated data to peer institutions, which will be presented in the Standards for Accreditation / 2020 Standards / Concerns section. One of the main purposes, as Lily stated, “and the one that causes us most of our big headaches—is addressing the question of student learning. That is, can we demonstrate that students are mastering the outcomes we've set?” Similarly, Grover expressed that, “Faculty and other staff, at least through the last three revisions of the Standards, continue to struggle with the distinction between course, program, and institutional assessment and the continuous improvement cycle.” In part, the “struggle” is due to ambiguity in the terminology that is used for the assessment of student learning as well as a lack of clarity regarding what distinguishes one level of SLO assessment from another (Ewell, 2001; Ewell, 2011, Baer, 2017). Moreover, Lily elaborated:

If the college offers anything beyond a narrow handful of degrees, it's also nearly impossible for most of us to answer [the question of student learning] meaningfully. I
presume that the question arose over public outcry about some notorious cases of degree-mills. Fair enough. But, in my experience, very few of us have a common, workable definition of what it means to "assess student learning." So, colleges and evaluation teams—despite the best of intentions—regularly collide over it.

Several participants reported that faculty often talk about assessment as an additional task adding to their workload that is strictly done for the sake of compliance. As Stacy reported, “Assessment continues to be a challenge for many of our faculty, particularly those in non-externally accredited programs. They often feel assessment is thrust upon them, is a waste of time, and generates meaningless and therefore useless data.” Supporting this statement on the faculty perspective, Titus stated:

As faculty, I understand the need for accreditation and how accreditation may assist faculty in reflecting on their role as educators. This role should naturally move us to investigate our teaching and, by implication, student learning. However, having said this, it is also true that many faculty, who in reality are only tangentially connected to accreditation, often view accreditation as an externally imposed requirement, another hoop to jump through. Assessment, especially of student learning, requires a cultural shift that moves faculty from only relying on grades to a process that might frame a conversation about curriculum and student learning. Given the somewhat negative faculty perspective regarding accreditation, accreditors and institutions may want to strategize on how best to involve faculty in the process of accreditation.

As another long-time faculty member, Peggy added that while most faculty holistically understood what their students were learning and not learning, “little emphasis” was placed on formal direct assessment of student learning at zir institution by leadership. Without leadership
support, resources are not allocated to support assessment (Stephens, 2017; Immordino et al., 2016). Some participants also cited a general lack of knowledge of formative and summative assessments, faculty resistance, and a lack of a program-level or institutional culture of assessment (Ewell, 2011; Hall, 2012).

At large, participants remarked that students enroll in colleges and universities to learn, but that the mechanics of assessment and the lack of resources to implement a comprehensive assessment plan are a challenge. This was an even greater burden and concern under the 2010 Standards. As Brit expressed:

While I would certainly agree that classroom learning is the most important thing that we do as a college and that a good portion of the report should be dedicated to how we know students are learning, where we can identify challenges to learning, and how we use the information we collect to improve, asking for the colleges to discuss 4.A.3 for each core theme can be a challenge. At least the way that the college I am at set up their core themes, direct student learning outcomes assessment was more relevant to some of the Core Themes than others. As a community college, things like service to community / community engagement are also core to our mission. And, while the college could have Core Themes (focused on learning) and then another set of Strategic Priorities (focused on institutional support), that is a lot for a small college to carry and it makes understanding and measuring Mission Fulfillment more challenging.

In reflecting on the work that the College had to do for the Year Seven report, Brit added, “We need the Standards to have the leeway to serve as all of the institution’s priorities, with direct student learning as a major component, but also with support for learning (in its many forms) being an integral part as well.”
Stacy remarked, “I believe there is a critical balance between efficiency and effectiveness” when faculty engage in the direct assessment of student learning. She continued explaining:

- If assessment is too efficient (software based / generated, requiring little thought / effort from the user), the results become someone else’s (the system’s?). The faculty may not feel ownership of the data / results because the data is simply a by-product of teaching and grading.

- On the other hand, if there is no effort to provide technological support for assessment, the task becomes onerous—the ROI on the effort expended versus insight gained—is too low to justify.

- In between being fully automated and fully manual is a thoughtful intermediate of deliberate and designed use of technology to support assessment.

- Ongoing, regular assessment best supports an efficient accreditation process.

The recurrence of a lack of adequate resources for the comprehensive evaluation of student learning was echoed by many participants. The experiences that the participants shared centered primarily on a lack of resources at large. Heifetz et al. (2009) and Kotter (2012) argue that adaptive leadership is necessary to implement and sustain cultural change and create a sense of urgency, as would be needed for the assessment of student learning at all levels across an institution. Further, leadership backing is crucial to gaining the resources (funds, technology, time, personnel, etc.) to plan, implement, and sustain the change (Stephens, 2017; Immordino et al., 2016). In January 2020, the NWCCU released a new set of Standards. In studying them, Titus stated, “I think the new Standards, as they focus on student learning, will make the accreditation process more meaningful. The extent to which this will occur will depend on how
institutions involve their faculty more directly in assessment of student learning.” Faculty are primary stakeholders in learning assessment. As such, the engagement of faculty in the process is critical for its success (Banta, 2004; Kotter, 2012). Going forward from 2020, Grover expressed:

An actual team of trainers who could visit colleges which requested the training workshops—regarding walking participants through the differences of these three types of assessment—would be helpful. Bringing examples from other like institutions of these three levels of assessment would be helpful, particularly demonstrating assessment of student achievement versus student learning.

Peggy further added that “It would be helpful to have stronger guidance around student learning assessment.” Other participants echoed this sentiment requesting professional development from the NWCCU to increase the clarity of the Standards, expectations, and to learn best practices for the assessment of student learning.

Participants reported that some colleges have already made a cultural shift to focus on assessment. Titus shared the following:

As an evaluator for the NWCCU, what I am now going to say may seem contradictory to what I said above about lack of faculty interest in accreditation. The schools I have evaluated are explicitly looking at the assessment of student learning outcomes. For many schools, the assessment of student learning has become the center piece of how they approach assessment. What I see among the faculty is that a central group, such as a general education committee, is working to develop assessment plans and working to improve teaching and learning. How this plays out among the faculty as a whole is often episodic and disjointed. The new Standards may help to improve faculty participation.
The evaluation of student learning outcomes continues to present many challenges to participants.

From the NWCCU, participants expressed that they would like to see concrete terminology, rubrics, exemplars, and professional development. Participants would also like to see Standards written with recognition that institutions with smaller resource pools may not be able to fulfill the mandates of the Standards. Within the institutions, participants would like strong leadership support demonstrated through the strategic plan and allocation of adequate resources to support a culture of institution-wide assessment of student learning including funding, personnel, technology, professional development, etc.

**Continuous Improvement**

Strategic planning and continuous improvement are inextricably linked. Where strategic planning is the process that an institution uses to accomplish its mission and vision (Immordino et al., 2016), continuous improvement across the organization is one of the key goals. Adaptive leaders (Heifetz et al., 2009) approach continuous improvement and accreditation activities through an integrated approach to make meaningful decisions regarding institutional effectiveness, the assessment of student learning, student achievement, and support services.

“Accreditation,” Natalie offered, “is about continuous improvement, with a side helping of Standards to make sure the college is fiscally solvent and is generally expected to continue being so.” Lily stated, “It’s where the assessment of institutional effectiveness comes in, as well as planning, resource-allocation, and evaluation functions that, in theory, would assure that the institution is continually getting better at what it does, not just maintaining current-level functionality.” Yet, Peggy shared that at zir institution, “Continuous Improvement did not seem to be the focus.” Instead, the institution “seemed more focused on data than on the processes that
impacted the data.” As the College had not done short or long-term planning, let alone integrated planning, there were “unclear links between baselines or benchmarks and improvement as we focused heavily on data rather than strategies.” This, ze reported, resulted in “many missed opportunities for improvement as they went unaddressed.” Having had similar experiences at zir own college, Natalie observed:

I think some of this is on the college to make accreditation “a part of things” rather than “its own thing.” The commission can help by being transparent about why it has the Standards it does, and that it serves both four-year and two-year schools, which can have VERY different resource pools.

The Standards are meant to assess quality across institutional types. However, as Natalie as well as other participants remarked, institutions have “different resource pools.” Some participants specifically referenced four-year research universities in contrast to two-year institutions, while other participants pointed to the size of the institutions saying that a large college has more resources than a smaller college. Yet other participants noted the differences between public and private colleges. In each case, the issue brought forward is that some colleges do not have the resources to meet the requirements imposed by all of the Standards. For example, as presented in the Standards for Accreditation / 2020 Standards / Concerns section, concern has been expressed in regard to the new requirement to disaggregate and compare institutional data to peer and national colleges. In this example, the concerns expressed are two-fold: (1) not finding value for their institutions by doing the outside comparisons; and (2) the resources required to meet the requirement. For institutions with larger resource pools, there may not be a significant issue. However, colleges with smaller resource pools, expressed that Standards need to recognize the differences across colleges be written to fit all sizes, types, etc. of institutions. Another was that
they need to have different or modified Standards depending on the criteria that are tied to institutional resources to ensure resource-constrained institutions are not unfairly penalized for not meeting certain requirements.

When making determinations regarding Standards and continuous improvement, it is important to keep the purpose behind the requirements always at the forefront. “With [continuous improvement] in mind,” Troy shared, “the most meaningful change colleges can make would be to align any practice with purpose.” To illustrate, ze provided the following example:

One project the college did was interesting and had meaningful data, analysis, and conclusions. However, the project suffered from the same institutional apathy that student learning outcomes assessment does. The reason, in my opinion, can be traced to the project not being tied to a purpose from the very start. Was it just a project to look at student learning, or a project to effect change, assure quality, or to provide consumer assurance? Could it have been used for any of these? Maybe, but unless the purpose is clearly defined up front, it will never achieve any of those goals.

Along the same lines, Titus offered the following insights:

My planning oversight mostly relates to assessment of student learning and how that shapes courses and curriculum. So, if a department finds that its students are not meeting learning outcomes, how might that affect the way in which the department plans its curriculum. This connects planning directly to improvement. We could say that planning and continuous improvement are two sides of the same coin. Thus, improvement should be based on planning. If not, then why plan in the first place. This seems like a truism, but often we plan without a sense of what it is we are trying to improve. The flip side is
that efforts to improve can be based on inadequate planning. The other key is how and what data is used to inform planning.

On the accrediting side, Jay offered that, “By focusing institutions on improvement while recognizing that continuous improvement will include failures that are learned from, you will create more effective and meaningful work for colleges in the accreditation process.” Ze further added, “In general, this concept has not been as explicit as it should be in the Standards.” In conclusion, Troy reiterated, “Any change needs to directly address to what purpose a change is aimed, and the change will need to be monitored for effectiveness in meeting that purpose… it should be regularly evaluated on whether it is meeting the stated purpose.”

**Perceptions of the Standards for Accreditation**

Sandy declared, “I am a true believer in accreditation. I am critical by nature, and I profoundly believe in the system and the spirit behind it. Though participants had some mixed responses to the Standards, Sandy’s thought was reflected by the majority of participants—such as Titus, who said, “As the ALO, I have a keen understanding and appreciation for the work of accrediting agencies, particularly the NWCCU”—even when they voiced confusion or concern.

**A Brief History of NWCCU Standards**

“Prior to 2010,” Titus stated, “the NWCCU Standards said little, or next to nothing, about student learning and the student experience. Accreditation was essentially a matter of compliance in areas such as finance, physical plant, planning, library, and personnel.” Ze further explained:

The revision of the Standards in 2010 began a shift to a more value centered approach to accreditation. The implementation of Core Themes as the center piece of accreditation provided the foundation of this shift. The Core Themes were to be an institution’s value statements. The problem was that the Standards required institutions to explain the
planning process of how the Core Themes were developed, which led to confusing and cumbersome efforts to explain the Core Themes.

Sarah, on the other hand, reported that the 2010 Standards “made the tendency toward a compliance exercise more likely by imposing the language of Core Themes, Objectives, and Indicators.” “You look at the 2010 Standards,” Troy added, “they kinda went in the right direction, but there was a lot of repetition that added to the feeling of compliance reporting. There was also a lot of free interpretation that really shouldn’t have been free interpretation.” The language was broadly written to allow for differences based upon institution type, sector, location, mission, and goals. Many participants reported that the result was a lack of clarity in the Standards, and therefore, also in expectations. Titus noted, “There were also difficulties in assessing the Core Themes. Most institutions developed a numerical scorecard to show how they were meeting their Core Theme Indicators.”

Thinking back on zir recent Year Seven report, Brit said, “One of the things that was a challenge for us was trying to update all of the Standard Two information along with the rest of the Standards in the year prior to the college’s site visit.” Similarly, Peggy stated, “Because Standard Two is so large and there wasn’t a clear understanding of the depth of response required, it took a lot of time to create this report and I do not think it was worth the time spent.” Troy reported that in Standard Two, “there was an overemphasis on governance, which was a real problem. There were some things that were in the governance section that shouldn’t be considered governance, such as student services.” Brit observed, “If I had not had a second person in my office focused on Standard Two, I would have been quite overwhelmed at trying to do everything at once.” Ze further added “I will say that the addition of the required evidence
worksheet was very useful for us in developing the report. Anything that helps us to know what the Commission is looking for is a welcome tool for the process.”

Between the repetition across Standards and the requirements of Standard Two, Titus expressed “This also led to the creation of self-studies that numbered in the hundreds of pages. In response to concerns expressed by schools in the NWCCU region, the Standards were revised and streamlined.

**Revised NWCCU 2020 Standards**

Troy stated:

For years, the commission was under the political sway of different leadership, and that leader’s political purview resulted in a view of accreditation that truthfully, we’re still trying to correct in the by-laws and the cycles that we’re doing now today. It wasn’t until the leadership recently changed that the political point of view that started in the late 90s slowly went away. We are now drifting back to the achievement side of it for students.

The 2020 Standards includes two Standards that are more student-centric and removed much of the repetitiveness that existed in the 2010 Standards. Standard One is focused on institutional effectiveness, student learning, and student achievement, while Standard Two is focused on governance, resources, and capacity.

**Improvements.** Participants reported overwhelming support of the new Standards. Titus stated, “With the approval of the new NWCCU accreditation Standards, we have an opportunity to re-think the role of accreditation in higher education.” Sarah added, “The language in the new Standards accomplishes the same thing, but does not impose the Core Themes framework, making it easier to speak about how our institution goes about the planning→assessment→improvement cycle in language that is authentic to our campus culture.” This was accomplished
by in large through “removing the tedious repetitive nature of the 2010 Standards, which I appreciate,” said John. Grover noted that “The main contradiction of the previous Standards has been removed, that being that mission fulfillment and continuous improvement are not necessarily compatible.” “Part of the rationale for the revision was to make accreditation more efficient, effective, and meaningful” Titus explained. Ze continued:

The new Standards still require attention to compliance and finance. However, the central focus has clearly shifted to an examination of the student experience both in and out of the classroom. Student learning, student success, and student achievement have become the lens through which the NWCCU is framing accreditation.

Grover noted, “The revised Standards and Eligibility Requirements for 2020 and beyond are a definite improvement and model continuous improvement holding the NWCCU accountable to the same standards and expectations as the member institutions being evaluated in the region.” Ze also asserted:

The increased focus on student achievement and student learning [Standard One], and their differentiation, is an important change in emphasis that is more meaningful for evaluators and the evaluated alike. The reduction down to two chapters helps to eliminate much of the redundancy and confusion between the Standards found in the previous [2010] Standard chapters of three, four and five.

Peggy remarked, “Splitting the report into two phases is really helpful. First, it gets us started early, plus we have the opportunity to have that report read with feedback that can then be addressed in the final report.” “I am encouraged,” Brit added, “that the new Standards appear to mean that the Resources and Capacity (Standard Two) of accreditation will be reviewed and handled separately and prior to the Year Seven site visit.” “So, while it spreads the reporting over
two years,” Peggy continued, “I think each section is likely more focused and better quality.”

Sarah offered:

In terms of how the process can be made more efficient, effective, and meaningful, I think the new Standards provides a very helpful opportunity to separate those items where the issue really is compliance with some minimum Standards, now covered in the Mid-Cycle Evaluation, from an evaluation of the effectiveness of the institution in delivering on its educational mission for all of its students. Though some stakeholders on campus may resonate with particular requirements in the new Standard Two (librarians, for example, lobbied hard to get [library specific] language included), for the campus as a whole a focus on student outcomes is inherently a more meaningful focus for accreditation.

The challenge will be striking an efficient and effective balance between requiring the institution to evaluate clearly specified evidence and allowing it to tailor what it evaluates to its specific mission, priorities, populations served, and context. Perhaps providing a list of the types of evidence typically used to address each indicator would make the process easier for institutions to navigate without being so prescriptive that it becomes an inauthentic compliance exercise to deliver the exact data being mandated. A repository of exemplary self-study responses to various sections that institutions are willing to share would also help individual institutions understand more clearly what is expected of them by each of the indicators in the Standards.

Grover was pleased to report that “Many of the recommendations for change of the accreditation process which I have hoped for have actually been addressed with the new Standards. The feedback received from stakeholders clearly played a large role in the revisions.”
**Concerns.** Participants identified a variety of concerns regarding the 2020 Standards. The most prevalent was regarding the requirements for peer and disaggregated peer comparison data. John’s thoughts succinctly represented the disparate reports from other participants as ze was able to provide responses from both an evaluator and college purview:

The peer comparisons are counterproductive. It was meaningless to [a college where the participant was an evaluator] to search out the peer comparison data. They further found that disaggregating the data for peer comparison purposes confounded it as well. That portion of the activity and report was compliance only. Neither the College nor the evaluator team found it meaningful.

Having had that experience as an evaluator, I now have very mixed feelings about the requirement to compare the data at my own institution to other colleges data—especially disaggregated. This is a HUGE undertaking that will require a lot of resources, and I am not sure it will be helpful to our college or colleges in general. Low counts can result in redactions being needed and inconsistent coding across colleges can make the comparisons incorrect. This requirement seems arbitrary. Instead, we should be taking a look at our own baselines, setting targets and improving our institutions.

Jay added, “I think one of the historical challenges has been that implementation of initiatives at colleges is complex and slow, and colleges tend to fear movement, particularly if it could lead to a risk of poor outcomes.” Along these lines, Sandy offered that “There is real concern that the push for increasing graduation rates may result in lowering quality education and rigor.” Finally, Brit presented the following observation:

One thing I think is a challenge with the Standards, is that they don’t really take into account the differences between colleges that are predominantly four-year BA granting
institutions and institutions that are predominantly two-year degree-granting institutions. This shows up as a challenge in the kind of information that is requested in the Standards—especially Standard Two.

**Moving Forward.** The participants expressed several thoughts around creating greater clarity of expectations. They offered additional insights and recommendations for moving forward with improvements in the process of accreditation. Troy said, “A glossary would be helpful” and “The development of rubrics a few years ago was a step in the right direction in creating the tools to provide greater consistency and fairness in how colleges are evaluated given the different Standards.” Grover said the “Continuous improvement of these rubrics for the new Standards needs to be a commitment to help both colleges which are preparing for a visit as well as clear guidance for peer-evaluators.” Peggy echoed this thought, saying that “It would help to be clearer about expected structures. If there is a rubric, provide it to everyone BEFOREHAND. If there isn’t a rubric, create one.” Grover added, Since the Policies, Regulations, and Financial Review (PRFR) as an offsite compliance review in Year Six is a new part of the process, clear explanations and examples will be important to provide so as to relieve confusion around expectations.” “One of the ways in which accreditation becomes less effective and meaningful,” Sarah offered “is that it suggests institutions need to FULLY meet all of the indicators of every Standard in order to maintain their accreditation status.” Yet, ze explained:

Those experienced with the evaluation process understand that reports will note concerns that aren’t sufficiently out of compliance to mandate a follow-up response from the institution and will make recommendations with mandated follow-up responses when an institution is clearly failing to meet a particular Standard but is not so egregiously off track that its accreditation status should not be reconfirmed.
Therefore, Sarah suggests that:

If institutions are encouraged to clearly identify areas where they recognize they are not fully in compliance, and to propose to the commission the timeframe by which they expect to show they have closed the deficiency, and the commission were to look favorably on such self-disclosure in evaluating the institution, it would encourage more authentic, and therefore more *effective* and *meaningful* self-assessment. It might also improve *efficiency* since an institution would be guiding evaluators more clearly to at least some of the issues on which they need to focus.

To increase the efficiency, effectiveness, and meaningfulness of the process, Jay provided the following insights:

1. Colleges feel compelled to tell the story of all the little things they are working on. Encourage reporting only on initiatives that are being planned or implemented with sizeable student impact. Find a way to promote colleges reporting on significant changes, even when they are not effective or fully implemented. This recognizes the complexity of this work and incentivizes colleges to feel like they can take risks and not be punished for those risks.

2. I like the questions the NWCCU evaluating teams are asking in their visit, but that are not yet written down in the Standards. To what do you attribute your successes (or not) in graduation rates, etc.? Having colleges report on those questions in the context of their KPIs and agreed upon scorecard data (if it’s needed) during Year Three and in the final report makes a lot of sense. From the standpoint of assessment of student learning, the key is to be really clear about the expectations. I personally think we should be accountable for showing how we
use the assessment of student learning, but not for constructing arbitrary metrics to meet accreditation Standards. Let us use graduation, transfer, and employment metrics to collectively demonstrate that student success piece.

3. I think if the Standards can allow institutions to provide evidence of these Standards with a focus on student success, equity, and institutional continuous improvement, you’ll better align with the work that institutions find meaningful.

Overall participants expressed appreciation for and support of the new Standards including removing redundancies, reducing the Standards down to two, and changing the submission process to allow for feedback on Standard Two prior to the Year Seven submission. The greatest concerns that participants identified were peer and disaggregated peer comparison data requirements, reporting that these requirements seemed “counterproductive,” were not meaningful to evaluators or colleges being reviewed, and required a burdensome amount of resources. Moving forward colleges would like clarifications and exemplars for the PRFR to ensure that they understand the expectations. Additionally, participants would like to see continued emphasis on reporting that is more succinct and highlights student success, Titus observed, “While it remains to be seen how the new Standards will be implemented in practice, the hope is that the written self-studies will be much more concise and focused.” Adding to this thought, Grover recommends that the NWCCU “continue to lean the self-study process down to help colleges focus on the real essentials and allow evaluators more time to focus on the most important aspects of the Standards.”

**Professional Development and Training**

Participants overwhelmingly reported a greater need for professional development and training on the requirements due to the collective uncertainty that surrounds accreditation.
Participants are unsure about the purpose of accreditation, what the Standards are and how to respond to them. They expressed clearly that professional development needs to occur more frequently with venues that enable institutions to bring larger teams together. Further, participants stated that ALOs and Evaluators need more support and training at all levels. “The main thing that I believe is needed to improve the accreditation process in the northwest region,” Brit expressed, “is more in-depth training and communication. Large scale, once-a-year (and, frankly expensive) trainings are not an effective way to communicate with colleges, at least not as the primary source of information sharing.”

**Clarifying the Purpose of Accreditation and the Standards**

**Accreditation at Large.** “There should be some type of uniform education about what accreditation is all about that can be shared with faculty, students, and staff. A lot of employees and students have no idea what accreditation is, especially if they are new,” Jeanette said, and continued to note, “If the commission could create something that all colleges could use, that would be nice.” Sandy added, “Having people be more educated about what accreditation is, would increase my ability as an ALO to get people across the college engaged, and that would make it more meaningful.” Long-term veterans who are knowledgeable of accreditation requirements described the issue and presented insights. For example, Troy stated:

> The more I thought about this, the more I came back to the idea that to make accreditation meaningful, one needed to address improvement in terms of the purpose of accreditation. I get stuck at this point, though I have tried to get past it. The reason for this is that at this point in time, I have a hard time clearly defining what the purpose behind accreditation is.
• Does it still exist to assure that programs and degrees have sufficient rigor to merit recognition and transfer between institutions?

• Or is the purpose to act as a customer reliability process, to insure those “buying” into an institution receive value to cost?

• Or is its purpose to provide quality assurance to government investment?

• Or is the purpose to be a force for change and improvement in education?

“Fundamentally,” Troy continued, “I think the process could be improved substantially through a clearer definition of purpose or, alternatively, a clearer differentiation of purposes.”

Lily echoed Troy’s statement and added, “I think we all go into the process with, at best, a vague and largely global, notional understanding of its aim. As a result, we tend to behave as if the process is one thing. But it's not.” Lily then presented three distinct purposes for accreditation from zir purview:

• Purpose 1, from my perspective, is federal (e.g., Title IV) compliance. In this domain, there are three subsets of issues.
  o The first is largely policy and procedure: Does the college have and follow the basic policies required to meet USDE guidelines?
  o Second is sustainability: Bluntly, can the institution demonstrate that it has sufficient funds and a plausible fiscal forecast to assure stakeholders that it won't fold before students can graduate?
  o Third and finally, there's been some federal movement to gather student attainment data in a way that allows "customers" to compare colleges to one another. Providing this data, then, seems reasonable and necessary to meet USDE's expectations.
• Purpose 2, I would argue, is loosely "continuous improvement." As I see it, this is largely a self-imposed Standard, viewed as "good practice" in the higher education community, but not the same thing as basic compliance and resource-adequacy. It's where assessment of institutional effectiveness comes in, as well as planning, resource-allocation, and evaluation functions that, in theory, would assure that the institution is continually getting better at what it does, not just maintaining current-level functionality.

• Finally, Purpose 3, and the one that causes us most of our big headaches—is addressing the question of student learning. That is, can we demonstrate that students are mastering the outcomes we've set? If the college offers anything beyond a narrow handful of degrees, it's also nearly impossible for most of us to answer meaningfully… In my experience, very few of us have a common, workable definition of what it means to "assess student learning." So, colleges and evaluation teams—despite the best of intentions—regularly collide over it.

“The trouble is,” Troy offered, “the current mission and Standards of NWCCU, and other accreditors, do not make this clear. Even federal guidelines and regulations are imprecise on the role and purpose of accreditation. So, making clear, meaningful change is bound to be almost impossible.” Lily concluded:

In fairness, NWCCU has tried to differentiate these things [federal compliance, continuous improvement, and student learning], over time. The Standard Two checklist and Title IV workups, for example, are good examples of tools to pin down Purpose 1. The two new Year Six and Seven reports will help here, too. But there's still a lot of
murkiness over the other two purposes, how they do or don’t interrelate, and what the "good enough" Standard is for each.

**The Standards.** Participants also suggested that there be better connections made between the purposes of accreditation and the Standards themselves. Natalie expressed, “In my opinion, understanding the why is a major part of moving from ‘check the box’ accreditation to meaningful and by extension, effective evaluation.” Ze continued, “Each Standard has been included for a reason. Lift the curtain a little and include the WHY of its inclusion. For instance, what does the Commission intend to learn or assure by this Standard being in place?” Several participants expressed that they spend a great deal of time developing tools to respond to the Standards and requested that clear guidance be provided in regard to how to respond to Standards. For example, Meni said, “It feels like each institution spends a lot of time recreating the same things.” And ze asked if the NWCCU can “help us connect and share best practices?” Many participants requested tools, such as Peggy, who shared that zir college would benefit from “templates for routine reports such as Standard Two and models for reports on Standard One.” Continuing the thought, Meni requested “a repository of examples of good assessment processes, planning documents, etc.” Natalie explained that one of the reasons that colleges need the aforementioned tools comes down to interpretation and said that colleges need, “a clear guide on how to interpret the Standard” and how “they can interpret in terms of their college’s processes and practices.” Natalie further clarified:

- When you are writing Standards, don’t think about the administrators and the faculty with Grad degrees, think about the customer service reps, the facilities staff, and the other employees. If we really want accreditation to be meaningful, shouldn’t it be understandable by everyone at the college?
• Write Standards simply, using common language, use verbiage consistently, and have a glossary.

• I think there’s a balance here, because you are dealing with higher ed [executives], but you also need to make this process transparent for the folks on the ground.

The Need for State-Wide Training

One of the most frequent asks in reference to professional development was for state-wide training to take place to help institutions to not just understand the requirements but to also engage in inclusive and thoughtful planning with opportunities to learn from other institutions about best practices. For example, Brit offered, “I would like to see state-wide (rather than regional) trainings tailored to specific types of colleges (e.g., predominantly two-year colleges, four-year colleges, private colleges, etc.) in smaller settings.” Continuing that thought, Sandy said, “More state-wide training for ALOs, evaluators, and overall accreditation training and communication with more structure and more organization.” “For accreditation to be meaningful,” Stacy asserted, “the process needs to engage constituents across the institution.” Ze also stressed that “It is important to find a balance between engaging and burdening others.” Meni added, “I think we need to have opportunities to come together and network in-person, but there are cost issues, environmental issues, and time constraints.” Ze asked, “Could NWCCU facilitate connecting peer evaluators, ALOs, and institutions?” State-wide training, Brit asserted: Would provide the opportunity for colleges to bring more people to the trainings, and for more information to be shared. It would also facilitate colleges sharing their experiences, tools and help newer ALO’s and faculty to better understand the process. I benefited from the wisdom and support of several of my colleagues as I put together the self-evaluation
report and site visit logistics, but I am fortunate to have a strong network to draw from. Newer ALOs may not have that same kind of support. And, finally, more good examples shared by the Commission would be useful. Examples that include narratives from the Commission, “What did these colleges do well and why?”

John offered that one of the topics ze would like to see at state-wide trainings for college teams would be “workshops for colleges with like reporting timeframes [learning consortium] with time allowed for networking and rich sharing. Sandy added that the “President will not go to the accreditation conferences. Faculty do not think that it is a peer evaluation process. They think that a bunch of people from Olympia come to evaluate the College. John stated that “State-wide workshops would mean less travel for colleges; training could be more targeted; and allow more people from the College [faculty, assessment, student services, etc.] to attend. Therefore, it would be more meaningful.” Sandy remarked that her president “Would be more likely to go to state-wide training.”

A participant that will not be identified to maintain the anonymity of the said participant’s other responses shared that ze “brought Sonny [NWCCU president] to the College. The College loved him. He helped changed people’s minds about accreditation. But it would need to happen more often than every seven years. Faculty really had a good response.” Brit also spoke to the idea of in-college training, saying:

I believe that throughout the seven years of the process, colleges that are on the same cycle should receive regular communication from their commission liaison.

Communication that addresses topics like “What things should the college be working on right now in order to be on track?” Then as the Year Seven site visit and report get closer for colleges on a particular cycle, there should be opportunities to invite commission staff
to the college campus to visit and speak with faculty and staff. As an ALO, in the years leading up to the Year Seven report and visit, I held trainings, visited with departments and division, spoke with the Board of Trustees, and really campaigned hard for the importance of accreditation at my college. If I had been able to bring in a commission staff member, say just after our Mid-Cycle, I think it would have made a huge impact on the value placed on the accreditation process.

**Supporting Accreditation Liaison Officers**

The ALOs are the primary contact between the institutions and the accreditors and are responsible for “all matters related to NWCCU accreditation, including submission of reports and the review and institutional visit process. Members of peer-review teams will also communicate with the ALO on matters related to visit logistics” (NWCCU, 2020). From new to highly seasoned ALOs, interviewees expressed the need for more ALO training. Multiple participants shared feelings of unpreparedness as they became ALOs. Meni said, “I was excited to become the ALO. I really didn’t know what I was doing, though, and there weren’t any NWCCU ALO trainings in the near future.” Jeanette proclaimed, “I don’t feel prepared to be an ALO.” Reinforcing the trend, Sandy asserted, “Better ALO training, is needed. I need to have a clear understanding of what I, as the ALO, needed to address.” Jeanette imparted several thoughts regarding initial and ongoing training and support for ALOs:

- There should be an intensive training and orientation for new ALOs, especially in the area of substantive changes, paying dues, and evaluations.
- There should be ongoing training for ALOs on a regular basis outside of the annual conference.
NWCCU liaisons should have regular meetings with ALOs to establish an ongoing dialog and allow for open communication and guidance.

- There should be a way to get all the past letters and approvals in an online portal.
- There should be an automated way to be added to the ALO listserv.

Participants also asked for training to help them accurately convey the “need” for specific activities with college constituents, such as Brit’s example:

Communication and training need to be focused on making accreditation simple and meaningful—in other words, what success looks like and why it matters. For example, how has the process of student learning outcomes assessment impacted student learning over the last twenty years? How do we know it makes a difference? Why does long-range integrated planning matter to a college? What are some examples where doing this improves a college’s outcomes? As an ALO and Institutional Effectiveness Administrator, I believe in both of these processes, but any help I can get to show faculty and staff the value of these things would be huge.

John offered that “Anything that you can do to prepare your college is meaningful. As ALO I held workshops for the College while preparing for a Year Seven site visit. The workshops engaged everyone. We turned it into a festive occasion.” Other participants asked for training to prepare zir colleges for site visits. Regardless of NWCCU training, Sandy added a final thought, “Your ALOs need to be positioned high enough to have the authority to carry out the requirements of accreditation.” Sandy’s statement ties directly back to Heifetz et al.’s (2009) theory of adaptive leadership that argues that part of an executive team’s job is to instill and guide transformative cultural change to their organization. In terms of accreditation, this connects clearly to the ALOs ability to help guide an institution from a culture of compliance...
reporting to a committed approach wherein accreditation is aligned with and part of the normal activities and practices of the college. As a member of the executive team, the ALO is better aligned to fulfill the requirements of the ALO position.

**Supporting Evaluators**

With a range of professional experiences (new – 20+ years), evaluators conveyed the need for more consistent and ongoing evaluator training from NWCCU to improve the quality of their evaluations. Meni observed, “The peer-review process is nice because it is collegial, but it also can feel like it isn’t consistent.” Similarly, Troy stated, “A problem I’ve seen with many evaluation teams is that the understanding, quality, and consistency as evaluators is inconsistent.” Troy elaborated:

> Quite literally, you can get a team that walks in and only look at the fundamental things that will be applicable to Standards and check you off. In another situation you can have an evaluation team that’s so focused on one particular subject, that you could get multiple recommendations that could’ve been combined into one recommendation—and are so narrow that they’re not representative of the problems that the institution has. And on the other side, you may get an evaluation team that’s so generalistic that they see problems all over the place and have multiple recommendations—but they’re so wide-scattered and so general in nature that they don’t help the institution to address the problems that they have.

“Not only is training of evaluators necessary because of the new Standards,” Grover stated, “but there has always been significant room for improvement with how evaluators have been trained and there needs to be more norming in the training, so evaluators have a greater consistency in the interpretation of the Standards.” Sandy argues that “more intensive training is needed.” Troy
reaffirmed the need and added “This is not just for new evaluators. There needs to be regular training for all levels of evaluators.”

When evaluating reports and evidence, Peggy brought to light the need to “recognize that there is no one way to respond, but there are defendable positions.” Ze feels that evaluator training needs to reflect different scenarios and suggested that NWCCU add “simulations” to the training and remind evaluators to “Keep the question of meaningfulness to institutions ever-present.” In order to take deeper dives into training, Peggy also asserted that it is very important that an expectation be set for “participants to read materials and come prepared” with an understanding that materials and slides will not be read to them. Instead, ze said, “Train evaluators on how to apply [rubrics] in Standard ways for the best inter-rater reliability.” As a final note on evaluators, Grover expressed:

There has been confusing messaging around who is on the list of trained evaluators. As an evaluator a number of years ago, I found myself off the list and was never given a reason why. As a former ALO and now a president, I find people at my college who thought they were on the list for some reason are no longer on the list. In messages we get from the NWCCU asking us to name possible evaluators from our institutions, it is not clear if offering up new names adds to the list of people we already have on the list or replaces them. It is not clear how lists are made or updated.

Planning and Structuring Meaningful Site Visits

More Time and Collegial Evaluation

Several participants conveyed a strong desire for more time during site visits and more opportunities for collegial evaluations. With the amount of time that is allowed for a visit, John stressed that it is “Important to have a NWCCU liaison at every site visit. Ze can aid the
evaluators by performing research in the meeting room while the evaluators are in interviews.”

In preparing for the visit, Peggy stated, “NWCCU staff provided clear outlines for visits. We were able to follow the protocol for visits, setting up meetings, planning for locations, etc. and it was clear that the evaluation team would be addressing all the Standards [during our Year Seven visit].” Troy asserted, “The compressed timeframe to investigate all of the Standards creates a problem. The visits need to be longer.” Having recently gone through a visit both as an evaluator as well as at zir college, John elaborated:

We need more time for the visits. One and a half days for a Mid-Cycle and two and half days for a Year Seven visit is not enough time. As an evaluator, I was scrambling. It does not allow enough time for all of the interview meetings, note writing, or time for collegial help.

Stacy, another evaluator, added:

It wasn't a terrible process, but pretty exhausting—as you can imagine any full day of interviews and discussions might be. While my team and I were able to request various meetings and constituents, I'm not sure we always had the right people in the 'room' with us for each session—and there's not a lot of room for flexibility.

Peggy, on-the-other-hand, offered insight from the perspective of a college being evaluated saying, “Having two visitors to cover everything [for our Mid-Cycle Evaluation] seemed daunting. Ultimately, I think this contributed to the negative experience.”

Sarah offered, “My experience as an evaluator is that the visits, while rushed, do a remarkably good job of surfacing the key challenges facing an institution.” Ze then recounted the process based on zir experiences:
The evaluators have time prior to the visit to review the report and supporting documents and to discuss with one another what concerns are being raised in this review. That focuses the meetings requested and the questions asked in those meetings as well as requests for additional exhibits. More often than not, one or two additional issues will surface in the first day of the visit, and the evaluators will use the second day to see if they can corroborate those concerns or verify that the concerns are not an indication that Standards are not being met…

As I matured as an evaluator, I started dropping more verbal suggestions to those in front line roles where concerns were evident rather than pinning all of my hopes on close reading of an evaluator report, but I also recognize that the evaluation process can’t fundamentally change the receptivity to improvement of an institution. I have received enough follow-up reports that what I offered had moved institutions forward to be convinced that the collegial evaluation and this informal peer-to-peer sharing is a valuable part of the process. This might be the one way in which a longer visit could produce more impact, by affording more in-person meetings with key groups where the evaluators could share what they are seeing independent of what goes into the report.

Titus also noted:

I wonder if more could be made of the Mid-Cycle Evaluation as a collegial visit. This seems to be what the NWCCU expects of the Mid-Cycle. Here is what the NWCCU says, “Conducted in the third year of the seven-year cycle, the Mid-Cycle Evaluation is… intended to be a formative and collegial evaluation with the institution in conversation with the evaluators.” Thus perhaps, there needs [to be] a more deliberate affirmation of what the Mid-Cycle is supposed to be and do.
John shared, “I would like to see more collegial Mid-Cycle Evaluation and Year Seven visits. It would be a best practice to offer peer-to-peer help during evaluations to help colleges move forward.” Peggy said, “[During our Year Seven, the] visiting team members seemed genuinely interested in how we use or do not use data for improvement.” However, ze also shared that the evaluators did not offer any feedback. Troy reaffirmed the “Process needs to be more collegial with more ongoing conversation throughout the evaluation including peer-to-peer suggestions for improvement.”

**The Need for Evaluator Team Continuity and On-Going Conversations**

The majority of participants expressed the need for evaluator continuity across evaluations—to various degrees. Troy stated:

Another area that would help the process be more efficient, effective, and meaningful, is if there’s some continuity in the evaluation team. And what I mean by that, is that the evaluation team that comes at the end of the seven-year cycle is not the team that came in at your Mid-Cycle Evaluation and is not the team that you saw at any other evaluation. Those that are reviewing your institution have no real experience with your college.

It would be very helpful and make the process more efficient, especially in terms of assessment and improvement and those key things that are focused on student achievement and student progression that you have a set group of evaluators that stay with your college through the whole cycle. They know your college because they’ve been there before or, if it’s their first time, they have people that they’re working with that have been there before.

Peggy acknowledged that team consistency “is fraught with potential issues such as what if you get someone you don’t mesh with? What if big changes are needed and the team doesn’t
see it and across time the situations worsen from lack of attention? I think it benefits us to have different visitors.” Along the same lines, Sarah shared:

Having experienced a visit for one of our [programmatic] accreditation visits where one evaluator clearly had a personal ax to grind. I am mindful that there is also a benefit in having a fresh set of evaluators consider how an institution addressed recommendations made by a previous group of evaluators. I wouldn’t want us to be locked in to having to convince the original group that we had satisfied their concerns in cases where those concerns were misguided.

While recognizing the logistical challenges of keeping an entire team together, the need to prevent implicit bias, and the “the evaluator becoming attached,” Natalie said, “Having consistency with one or two evaluators, they will be able to see the delta, how things have changed since the last time. I can absolutely see the value in that.” Following up, Peggy offered additional clarity:

I do think it would be helpful to have some continuity among visiting teams, particularly if there is an Ad Hoc visit. We are preparing for an Ad Hoc and considering the quick timeframe, it would be helpful to cut to the chase.

Recommendations are followed up through Ad Hoc reports with visits, Ad Hoc reports without visits, Special reports, or as addendums in conjunction with other site visits such as an upcoming Mid-Cycle Evaluation. “I think having the chair or at least one member of the Year Seven team follow the process into at least the Mid-Cycle would be valuable,” Brit said, “Because that person is familiar with the College’s challenges and plans, it would give them insights to ask good questions that could support the college in moving forward.” Natalie agreed that “Having someone from the team who made [the recommendations] either on the follow-up team, or
available as a resource, would probably be invaluable in a lot of situations.” Following this thought, Sarah confirmed that if a college receives a recommendation(s) during a Year Seven visit, that it would be logical to have:

one of the Year Seven evaluators serving on the Mid-Cycle or an Ad Hoc review in response to a recommendation… It can be hard for an evaluator to read the language of a recommendation and see from that what specific concerns gave rise to that recommendation and having someone with that memory in the conversation could improve the process.

Peer-Evaluation Recommendations

Multiple participants commented on the need for greater clarity in offering recommendations. Jeanette said, “Recommendations should be as specific as possible so that the institution clearly understands the problem so they can address it accordingly.” Jeanette then provided an example that occurred saying that “The institution had to follow up with multiple surveys to try to determine the issues.” Unfortunately, the response rates were low, which leaves the college unsure if ze are “correcting” the right “thing.” John echoed those thoughts, “Following up on recommendations takes a lot of time—especially when we don’t understand where it came from.” “We don’t understand what they say or what to do with them. Recommendations need to be direct and actionable,” Troy argued and provided two examples:

The recommendations we got were spot on, but they were generalized: in very broad language. We had a recommendation by the evaluators that was very direct, very succinct, and told us that there was a problem and that the college needed to dedicate more resources [money] to resolve it. It goes to the commission and changes from a very strong, very imminent, very hard-worded recommendation to a recommendation that says
that the college is substantively in compliance and that it should improve. The language about spending funds and other things like that was removed from that recommendation.

Another recommendation on program assessment essentially said that the college needs to put more effort into program assessment. That wasn’t the problem. The College has been trying as an institution to do program assessment for 20 years. It is hard to do assessment without faculty and our faculty don’t see assessment as their job. I had evaluators during the site visit tell me “Faculty need to do assessment,” but that’s not what the recommendation said. It said that the institution needs to focus on program evaluation for student learning outcomes. Because of the wording of the recommendation, faculty say it is the institution’s job to address learning outcomes—not the job of faculty.

Sarah countered, saying:

If an institution has been appropriately self-critical as it developed a self-study then evaluators would rarely deliver cryptic recommendations. The evaluators try to put into the body of the report information that helps provide context for the recommendations, but it is not their role to tell the institution exactly how they should change their management of the institution, so they refrain from making overly narrow and directive recommendations. If that wasn’t the case, you would have likely received complaints that the recommendations were trying to force the institution to do things that didn’t work well in their specific context and were overly narrow and prescriptive.

Additionally, Titus observed:

If recommendations are not clear, would it be possible for the institution to ask for clarification from the Commissioners, as they are the ones who have the final say on
recommendations? The evaluation committee chair and the NWCCU liaison could also
be more specific and helpful in forming the recommendations as they refer to specific
Standards. This could give more direction to the evaluation committee’s formulation of
recommendations. This could be a matter of chair and evaluator training.

Finally, Sarah offered that colleges play a part in the evaluation and therefore the
recommendations:

As the recipient of evaluations and as the ALO, I think it is my responsibility to set the
evaluators up to be able to succeed. That means making sure my report is well organized,
clearly ties to the Standards, and clearly ties to supporting evidence. It also means
acknowledging any known issues where we are not meeting Standards at a level we
would find satisfactory.

The most helpful evaluator recommendations are those that add urgency to
positive changes the institution recognizes it needs to make, and a smart institution will
invite those types of recommendations. During the development of reports and also prior
to evaluator visits, I evangelize that message to the campus: encouraging everyone to
constructively engage with the evaluators and not try either to hide our challenges nor to
ty to pull the evaluators into taking sides in internal debates over precisely how we will
work to improve.
Chapter V: Discussion

Several of the findings of the present study were significant and merit further consideration. The fact that these findings emerged from a cross-section of higher education leaders from two- and four-year institutions from both the public and private sectors residing across four states, with 48 percent currently or previously having served as faculty lends additional credence to the findings. This section presents implications for institutions and NWCCU under the four following themes: (1) implementing and integrating a meaningful continuous improvement cycle; (2) making the Eligibility Requirements and Standards more efficient, effective, and meaningful to colleges and universities; (3) professional development and training; and (4) improving the quality of site visits. Finally, I present recommendations for future research.

Implementing and Integrating a Meaningful Continuous Improvement Cycle

The continuous improvement cycle includes four elements: planning→ implementation→ evaluation→ and determining data-informed change for continuous improvement (see Figure 1), which feeds into the planning element of the next cycle. If viewed as the face of a clock, it is circular in nature, with each element following the other in a continuous motion. Many participants shared that their college administrators view and treat accreditation as compliance reporting that must be completed, in addition to their regular work, rather than an integral continuous improvement process. This disparate approach requires an influx of resources each time that a college approaches an accreditation reporting deadline or event, such as a site visit. Colleges using this approach reported that the additional resources that were needed to accomplish the reporting as compliance were wasted resources.
The changes that the NWCCU made from the 2000 Standards to the 2010 Standards were designed to align with (and were presented as) a continuous improvement model depicting activities that occurred over the seven-year accreditation lifecycle in a longitudinal schema. Several participants whose colleges approached accreditation as compliance expressed that by the end of Year Seven, they were getting closer to integration due to the reporting requirements of the NWCCU.

However, the reality is that once an accreditation cycle is complete, many colleges slip back into their previous routine, thereby proving Drucker’s famous “culture eats strategy for breakfast,” in this case meaning that moving from a compliance approach to an integrated approach is a culture change. Therefore, if cultural changes have not occurred, college personnel will perceive the completion of a site visit as a signal that the end of the accreditation requirement has been met, and the colleges will return to their normal practices.

Some participants suggested that it would be helpful if NWCCU developed a system for periodic review of planning documents (e.g., institutional master plans, budget plans, strategic plans, etc.), with predefined questions / prompts for the colleges to respond to. Others suggested that some of the prompts could include explanations of how the college uses data to inform planning and resource allocation; how planning and the use of assessment and evaluation data promote continuous improvement; and perhaps logic models. Additionally, participants requested more clarity from commission staff regarding expectations for the Standards.

The model also applies to the direct assessment of student learning. Of all of the assessments that the institutions perform, the vast majority of participants agreed that the assessment of student learning outcomes (SLOs) is the one that causes the most angst. Participants asserted that it is difficult to discern and differentiate between course, program, and
institutional level SLOs. Long-term faculty shared that SLO assessment also requires a cultural shift. Resources and lack of training also present challenges for this work. These sentiments are not limited to the NWCCU region, but echo reports across the regions. Thus, further demonstrating that the lack of clarity and consensus regarding the overall purpose surrounding the assessment of student learning presented in Ewell’s 2001 report, is still being faced today, 20 years later. The author clearly states that there is ambiguity regarding terminology, levels of student learning to be assessed [course / program / institutional] and the distinctions between them, policy decisions that will need to be made regarding what constitutes evidence, and that student learning needs to be assessed systematically.

Participants suggested that they would welcome having NWCCU staff create professional development workshops to increase knowledge of college teams in the area of assessment of SLOs at all levels, as well as to better understand how to describe and document student achievements. They would appreciate having exemplars from similar institutions. Colleges would like to have the training at their college, or limited to a small number of colleges, to allow for each college to have a sizeable team—including faculty, without being constrained by the size of the facility or distance (e.g., travel costs).

Having evaluated outcomes, whether of student learning, student achievement, or an institutional strategy, the organization next delves into the world of continuous improvement. In this area, the college:

1. Reviews the baseline data (where the college started).

2. Reviews the targets (the goals that the college set—e.g., I typically start with the long-term goal then set annual milestones / targets to help guide the college over the seven-year accreditation cycle).
3. Reviews the data across all years including change over time.

4. Reviews the resources that impact the topic being studied directly or indirectly.

5. And makes data-informed decisions that will be carried forward in the next cycle.

Yet, some college participants reported that continuous improvement was not the focus at their institution; there were unclear links between strategic planning, operational planning, and accreditation; and accreditation was something that their colleges engaged with in addition to regular college work.

With an integrated approach, one moves from a circular motion to the integrated internal cogs of a clock wherein each cog supports and scaffolds the others creating perpetual motion that eventually becomes a sustaining culture. Therefore, to make the change, a combination of Heifetz et al.’s (2009) theory of adaptive change, and Stephens (2017) and Immordino et al. (2016) strategic planning methods, which require alignment of resources with planning, an integrated approach can be achieved. These authors stressed the importance of wide participatory involvement in the planning to achieve committed investment across the organization resulting in change, which is echoed by NWCCU Standard 1.D.2, which requires that the institution demonstrates broad engagement.

College representatives suggested that it would be helpful to them for NWCCU to develop workshops explaining the purpose behind the Standards. They also expressed that learning from failures is a vital part of successful continuous improvement efforts. Yet, institutions are sometimes wary of innovation and implementing new strategies out of fear that the college will be judged harshly during an accreditation cycle. Therefore, participants asserted that by expressly recognizing failure as a part of innovation and continuous improvement in the
Standards, colleges will be more likely to focus on innovation, resulting in greater increases in their continuous improvement efforts.

Making the Eligibility Requirements and Standards More Efficient, Effective, and Meaningful to Colleges and Universities

The December 2017 annual meeting referenced in the introduction of this study provided information back to the NWCCU that resulted in the Commission hosting a series of events to gain additional information from their member institutions. The events included a public call for comments, seven town halls across six states and one online as well as discussion and action by the NWCCU Bylaws, Standards, and Policies Committee in 2018. Following the release of the first draft of the revised Standards in 2019, the Commission held another comment period, and more online town halls to solicit more feedback. Based on the results, a second draft was released and was opened for comment. Recommendations were made to the Board of Commissioners who held an electronic vote to adopt the Standards amongst the member institutions. In August 2019 the new Eligibility Requirements and Standards were approved (out of 158 institutions, 134 voted with 129 voting yes) (NWCCU, 2019a). Following the vote, Sonny Ramaswamy released the following statement, “The revised Eligibility Requirements and Standards reflect the iterative and concerted efforts of thousands of our stakeholders, commissioners, and staff. We look forward to instituting these new Eligibility Requirements and Standards to promote student success at our member institutions” (NWCCU, 2019).

This study provides another opportunity for the Commission to learn from its member institutions about the process and where improvements could be made. During an interview with NWCCU senior leadership, they also expressed deep interest in learning if the changes that had been made to the Standards added value and made the process more meaningful to the colleges.
The majority of the study’s participants expressed that if NWCCU established a system of tools, resources, and practices with the aim to promote clarity of expectations and reduce fear, it would increase efficiency, effectiveness, and meaningfulness of the accreditation process for institutions. For instance, the following were recommended as tools:

- A clear list of the types of evidence expected for each indicator.
- Clear expectations regarding reporting structures.
- A glossary of key terms.
- Development of rubrics for each Standard.
- Promote reporting strategies that have significant student impact as opposed to smaller pilots.
- Find ways to encourage innovation and recognize that strategies that are not fully effective or fail also offer learning opportunities for institutions.

It is worth noting that for the 2020 Standards of Accreditation, many of the requested tools such as rubrics for each Standard exist and are published as Appendices B-D in the NWCCU Accreditation Handbook. Appendix A is the Standard Two Evidence Checklist. Appendix F is A Guide to Using Evidence in the NWCCU Accreditation Process. Appendix H and I are the Guidelines for the PRFR and Mid-Cycle Evaluation, respectively. In addition, Appendix L is a Glossary.

**Professional Development and Training**

The aforementioned list of requested tools and resources that are published in the NWCCU Accreditation Handbook for the 2020 Standards is a noteworthy example of the
overwhelming need that participants expressed for more training. In regard to the larger purpose of accreditation, several participants shared that faculty, students, and staff at their colleges do not know what accreditation entails. Many have asked to have training that specifically explains what the role and purpose(s) of accreditation is. They further requested training related to the relationships between the purposes of accreditation and the Standards. They want to understand the “why” behind the inclusion of each Standard, as well as professional development tailored to responding to the Standards.

The most predominant request across participants was for state-wide—as opposed to regional—professional development and training. They shared repeatedly that for accreditation to be meaningful to their institutions, more people at the colleges need to be engaged in the process. Participants reported that for the training to be impactful, it needs to be more consistent than occurring just once a year; needs to be state-wide to allow institutions to bring larger teams; and needs to be more affordable to attend, as colleges argued that the cost associated with attending is prohibitive. Additionally, the participants reported that there are enough distinctions between two- and four-year institutions that they would like to see the trainings tailored to honor these differences. Finally, participants also suggested that workshops for colleges that are part of the same reporting cycles (learning consortiums) would be beneficial to ensure that there is coherence and continuity as institutions progress through the accreditation lifecycle. These learning consortiums could include professional development activities and messaging to help guide colleges from Year One to the Year Seven site visit. For instance, activities might include:

- Year One responding to recommendations and planning.
- Year Two preparation for the Mid-Cycle Evaluation report.
- Year Three MCE logistics.
- Year Four how to use the MCE peer-evaluation to move the college towards the comprehensive self-assessment.
- Year Five preparation for the PRFR report.
- Year Six college-wide preparation for the comprehensive self-assessment report submission and site visit.
- Year Seven and site visit logistics.

New to highly seasoned ALOs and evaluators consistently stated the need for training that is delivered more frequently at all levels and allows time for sharing best practices with other ALOs and evaluators. In addition, both groups suggested that NWCCU offer intensive training/ orientation for new ALOs / evaluators. It is worth noting that ALOs frequently also serve as evaluators, which means these two types of trainings would need to be held at different times to ensure that they are able to adequately fulfill their dual roles.

For instance, an ALO needs to understand how to use a rubric effectively to guide and report on college activities; an evaluator needs to understand how to use a rubric effectively to evaluate a college’s fulfillment of the Standards. ALOs also requested more consistent ongoing communication and support from and with their NWCCU liaisons; easy access to communication and report repositories; and easy access to signing up for listservs. Evaluators added that training for quality, consistency, and higher inter-rater reliability would be valuable and that adding scenarios to accomplish this would be useful.

Additionally, institutional leaders including the president need regular professional development on expectations and requirements. Offering professional development for institutional leaders including the president, vice presidents, and ALO that include a blend of the adaptive change framework and strategic planning to move institutions from a compliance
approach to an integrated approach would support this high-level visioning work. This would help improve how both the president and institutional leadership at large connects accreditation activities to institutional culture and how a top leader does / doesn’t articulate the alignments and connections.

**Improving the Quality of Site Visits**

The purpose of the Year Seven report and site visit is to determine if the institution meets the rigorous requirements for continued accreditation status. Prior to a Year Seven site visit, the institution submits a comprehensive self-study. The peer-evaluation committee reviews the institution’s self-study, support materials and the website to determine where they need further information to substantiate or dismiss potential compliments or concerns. During the site visit, the committee meets with various stakeholders at the institution through interviews and focus groups. Data and information are then triangulated by the committee members and formulated in a written peer-evaluation response that includes Compliments, Commendations, Concerns, and Recommendations pertaining to each of the Standards.

Two unexpected sub-themes arose in this area: (1) longer site visits with more collegial evaluations and (2) evaluator continuity across evaluations. The majority of participants reported that they wanted more collegial evaluations and more time during both Mid-Cycle and Year Seven site visits. Those serving as evaluators shared that it was difficult to investigate all of the Standards in the limited time allowed for the site visits; they felt hurried and exhausted. Two participants acknowledged that moving the PRFR to Year Six would allow more time to examine the other Standards. Sarah also shared that ze has been offering informal peer-to-peer discussions with the front-line people who are tasked to address the concerns as part of their duties during Year Seven visits for a number of years. Ze has received enough follow-up from those same
people affirming that zir actions helped their colleges that ze considers the collegial evaluation to be a valuable part of the Year Seven process. Titus offered that the Mid-Cycle Evaluation is intended to include a collegial evaluation, which is contrary to what colleges and evaluators have reported. Ze suggested that looking into the NWCCU’s expectations regarding collegial evaluation during site visits may be an area to look into more as well.

Several participants expressed the need for evaluator continuity across evaluations to different degrees. One participant suggested that a Year Seven team should be determined at the beginning of the accreditation cycle and stay with the college for the entire seven years. Other participants acknowledged the logistical challenges (e.g., getting the entire team’s schedules to line up for every visit, personnel changes due to retirements and turnover, etc.) that a fixed team would entail. Moreover, a long-term assignment might interfere with a person’s normal work schedule and workload. Other participants recognized that forming too close of a relationship with an institution could potentially result in implicit bias favoring the college with commendations and not recognizing issues that the college is facing to the point that unaccounted-for issues could intensify. Further, the participants expressly recognized the value of having new evaluators for scheduled visits to allow for fresh starts.

That said, the majority of the participants saw value in evaluator continuity as opposed to team continuity. They also saw this continuity best occurring following the Year Seven visit as opposed to leading up to the Year Seven visit. The suggestion is that if a college receives recommendations during a Year Seven visit, that one or two evaluators (possibly the chair) from that team participate in subsequent activities related to those recommendations. For instance, if it is determined that a recommendation will be followed up on as an addendum to the Mid-Cycle Evaluation, then a team member would be a part of the MCE team. If the recommendation will
be followed up via an Ad Hoc report, then a member from the Year Seven team would participate in the review of that report and site visit if one is required. Participants also suggested that it would be beneficial for one of the team members to participate in the next Year Seven site visit. It is important to note that the participants did not suggest that the evaluator providing the continuity would be the same person for each activity. On the contrary, they believe teams need to be nimbler than if activities were based upon a single person’s availability. Instead, the continuity team member or members could most likely rotate based upon the availability of the Year Seven team members. However, coordinating all of the logistics required could still be challenging for the NWCCU staff due to the availability of evaluators from the Year Seven team, evaluators changing employers, and timing to meet reporting requirements across a large number of institutions.

The need for greater clarity in terms of how to write up the recommendations also surfaced as a repeated need to make the process more effective. Participants expressed that the way the recommendations are often written may not always be clear, leaving the college unsure how to proceed with recommended changes. Some colleges shared that they have administered multiple rounds of surveys to gather information and / or input from stakeholders to determine how to proceed in the absence of clear direction from the recommendations. Due to low survey response rates, colleges sometimes gain little, or no clarity gained in the process. Participants reported that this type of follow-up is generally a waste of resources. Titus offered that if a college is unclear regarding what a recommendation entails, that they can reach out to the chair or to their NWCCU liaison to ask questions. As this process would take more time, and the additional clarity would not be included in the official recommendation communications, participants suggest that from the start, the recommendations are written in clear, concise
language. Finally, Sarah noted that while the peer-evaluator team writes the recommendations (that are submitted to the NWCCU board of commissioners for review, discussion, and finalization), the ALO and college also play a key part in the evaluation by setting the “evaluators up to be able to succeed.” This is accomplished through the presentation of their report including the organization with clear connections to the Standards and sufficient supporting evidence. Sarah reminds us, “The most helpful evaluator recommendations are those that add urgency to positive changes the institution recognizes it needs to make, and a smart institution will invite those types of recommendations.” The above quote about connecting urgency to positive institutional change ties directly back to Kotter’s (2012) accelerators, Heifetz et al.’s (2009) theory of adaptive leadership, and Bolman and Deal’s (2008) Symbolic Frame, wherein leaders focus on the vision to capture the importance of the work that the organization does and creates a culture of meaning and positive momentum. By using these strategies together, institutional leadership can help shape and shift the culture at the institution to better align these reporting requirements to everyday operations, as well as explicitly recapping the value of institutions having a culture of meaningful assessment. Activities such as curriculum mapping, data reflection, program reviews outside of reporting cycles, and regular strategic planning to align the resources and structures needed to support the work would bring greater transformative change for institutions.

**Recommendations for Future Studies**

Due to the predominance of feedback from participants noting a mismatch between the requirements of the Standards and institutions that have limited resources, it may be worthwhile for future studies to investigate the experiences of institutions by the size of their resource pools. The goal would be to determine specific components of Standards that may need to be reported
on based upon said resource levels. In addition to researching experiences based upon resource pool, identifying nuances that may exist based upon two- vs four-year institutions; public vs private sectors, and geographical area (rural / suburban / urban) may also be beneficial in adding greater clarity regarding expectations and determining if other reporting modifications or requirements need to be made within the Standards based on institutional types. Expressly performing a study that focuses on college presidents and how they view accreditation including the connections that they make between how they lead and how they get their institutions to move from a culture of compliance to commitment would be highly valuable.

**Conclusion**

The purpose of the study was to garner how the process of accreditation could be improved to increase efficiency, effectiveness, and meaningfulness to the institutions impacted based on the experiences and insights of practitioners who are directly involved in the process. The study revealed several successes as well as challenges. In general, colleges using a more integrated approach have found added success and meaning in all aspects of work tied to accreditation. However, the assessment of student learning remains a challenge at all levels due to a lack of clarity regarding how to design the evaluation of learning in a manner that prioritizes clear outcomes and meaningful planning. As the college participants noted, the periodic reviews of planning documents with guiding questions may be helpful to institutions as they try to make these cultural changes to view accreditation reporting as a meaningful process that supports rather than inhibits their daily work. Findings from this study offer implications to guide professional development and training to support higher education personnel in integrated planning for greater alignment of resources and continuous improvement; the assessment of student learning and achievement; and institutional effectiveness. Participants have requested
that NWCCU offer this professional development, and the Commission is positioned well to carry this out. NWCCU senior leadership clearly expressed, "Everything we do in the world of accreditation is to help the colleges."

Reflections

The concept of this study began in Spring 2017 based on long-term (20 years) collective confusion that was expressed by my colleagues across the region regarding accreditation and its requirements. To gain another perspective, as part of my Doctorate in Education program at the University of Washington, I engaged in a year-long Practicum on NWCCU Accreditation from June 2017-June 2018 under the guidance of my preceptor, Les Steele, Senior Vice President (retired), NWCCU. Working under Steele’s guidance, including submitting a report to him evaluating USDE CRF 34.602 mandates for re-authorization compliance of institutional accreditation commissions, helped me to understand the components of accreditation from the accreditor’s purview. Understanding that dimension of the work helped me to respond to some of the colleges’ questions during site evaluation when they asked why NWCCU requires certain Standards be addressed in reports and during site visits. The explanations I provided helped to bridge gaps for them. Different stakeholders appreciated learning what a participant in the study referred to as the “why” or the general purpose of accreditation. At the beginning of this project, I was amazed at the number of people who agreed to participate in this study. All of the participants in this study demonstrated a high level of dedication to the project. From their initial interviews to responding to follow-ups over the year, every response has had a wealth of experiences for me to glean insights from. To all of you, thank you.
References


https://doi.org/10.1002/9781405165518.wbeosg070.pub2


https://eric.ed.gov/?id=ED469482


### Appendix A

#### Table 1

*Institutional Participants*

<table>
<thead>
<tr>
<th>Pseudonym</th>
<th>Type</th>
<th>Funding</th>
<th>Current or Previous Faculty Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Robin</td>
<td>4-year</td>
<td>Private</td>
<td></td>
</tr>
<tr>
<td>*John</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>Leilani</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>Stephanie</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Sarah</td>
<td>4-year</td>
<td>Private</td>
<td></td>
</tr>
<tr>
<td>Brian</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>Geraldo</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Jay</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Stacy</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Lily</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Sandy</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Grover</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>Luke</td>
<td>4-year</td>
<td>Private</td>
<td></td>
</tr>
<tr>
<td>*Brit</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>Marissa</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Natalie</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Meni</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>David</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Troy</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Titus</td>
<td>4-year</td>
<td>Private</td>
<td></td>
</tr>
<tr>
<td>Michelle</td>
<td>2-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Jeanette</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
<tr>
<td>*Peggy</td>
<td>4-year</td>
<td>Public</td>
<td></td>
</tr>
</tbody>
</table>

* denotes full-time position.
Appendix B

Framework for Open-Ended Interview

You may have multiple positionalities, such as serving on the accreditation committee, strategic planning committee, report writer / contributor, faculty, staff, administrator, accreditation liaison officer, NWCCU evaluator, etc., which could mean that you have multiple thoughts in regard to a topic. For instance, a faculty member who is also a NWCCU evaluator may share two distinct point-of-views based on (1) their experience as faculty at their institution; and (2) what they experienced as a NWCCU evaluator at the institution(s) they were visiting. These lenses can provide additional, critical insights that will result in a more well-rounded study with broader applicability. Please reflect on the different roles you fill (or have filled) as you share your experiences.

There are two components to that I would like you to reflect on as you think about your experiences:

- Basic framework for accreditation
  - Planning
    - Efficiency
    - Effectiveness
    - Meaningfulness
  - Implementation
  - Assessment / Evaluation
  - Continuous improvement
- Research question
  - How can the process of institutional accreditation be approached so that it is more efficient, effective, and meaningful to colleges and universities?

With the basic framework for accreditation in mind, please share your experiences, thoughts, and feelings, regarding how the process of institutional accreditation be approached so that it is more efficient, effective, and meaningful to colleges and universities.
Appendix C

UNIVERSITY of WASHINGTON

DOCTORATE (ED.D.) IN EDUCATIONAL LEADERSHIP PROGRAM
DISSERTATION CONSENT LETTER

TITLE OF THE STUDY:
Institutional Accreditation: Making the Process More Efficient, Effective and Meaningful

CONTACT INFORMATION:
Researcher: Cynthia Requa, Ed.D. Candidate in Educational Leadership, UW, crequa@uw.edu
Dissertation Chair: Dr. Rachel Endo, Dean, School of Education, UW, rendo@uw.edu

PURPOSE OF THE STUDY:
The purpose of this study is to learn more about the experiences that higher education employees have had with the institutional accreditation process. Through interviews with a cross-section of administrators and leaders (institutional and NWCCU), I will explore the following research question:

How can the process of institutional accreditation be approached so that it is more efficient, effective, and meaningful to colleges and universities?

STUDY PROCEDURES:
This study will employ grounded theory to discover the experiences, perceptions, and potential solutions to the research question through an iterative data collection and analyses process. Data collection will be conducted through interviews in the modality of your choosing: in-person, virtual, telephone, or email.

Interviews will last between 60 and 90 minutes and will be taped and transcribed with your permission. In-person meetings will be held either at your workplace or a public location to accommodate your schedule. Interviews though email will be conducted through narrative inquiry and provide the opportunity for you to share your stories through written responses, which will act as the transcription. Responses to interview questions will be kept confidential from public access. Tapes/transcriptions will be destroyed at the conclusion of the study.

PARTICIPATION:
Your participation in this study is completely voluntary. You may decline to take part in the study or opt-out at any time without penalty by contacting me directly.
BENEFITS AND RISKS OF THE STUDY:
Your responses will help further the understanding of the experiences and perceptions that higher education institutions have regarding the accreditation process, as well as inform practices that institutions may consider in preparation for meeting their accreditation requirements.

The anticipated risks are minimal. If you decide to share sensitive information pertaining to your experiences, it may cause emotional distress. I will, however, maintain confidentiality to the best of my ability (see section below).

CONFIDENTIALITY OF INFORMATION:
Data collected from the interviews will remain confidential. Pseudonyms will be used throughout the study. Your name will not be used when I share my findings. I will not include personally identifiable information about you in my presentations and publications. All consent forms and data will be stored securely and only accessible by me.

Please note, however, that despite my best efforts to maintain confidentiality, it is possible that some readers may be able to identify you because of unique aspects of your experience. I will be sure to share with you the initial interview transcripts and my tentative analyses to allow you to correct the record or direct me to remove certain information.

ABOUT THE RESEARCHER:
I am currently a doctoral candidate in the Ed.D. in Educational Leadership program at the University of Washington. I have 20 years of experience in higher education institutional effectiveness, planning, accreditation, research, and grants management including appointments at Highline, Green River, Clover Park, and the Washington State Board for Community and Technical Colleges. I have served on and chaired accreditation committees at multiple colleges and serve as a NWCCU evaluator.

PARTICIPANT’S STATEMENT:
This study has been explained to me in a manner that I understand. I am volunteering to take part in this research. I have had a chance to ask questions. If I have questions later about the research, or if I have been harmed by participating in this study, I should contact one of the researchers listed on the first page of this consent form. If I have questions about my rights as a research subject, I can call the Human Subjects Division at (206) 543-0098 or call collect at (206) 221-5940. I will also receive a copy of this consent form.

Printed name of subject               Signature of subject               Date