ACTT
The Accreditation Council of Trinidad and Tobago
Established by Chapter 39:06
Quality is the Key

EDITORIAL

Accreditation in Search of its Future Remade or Rebranded for Quality, Innovation, Information, and Mutual Recognition

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Launched in 2005, The Accreditation Council of Trinidad and Tobago (ACTT) has proven to be an impressive agency that has established credible registration, recognition, and accreditation processes in post secondary, tertiary, and higher education institutions and programmes. Through its affiliations with diverse international agencies, ACTT has developed sound evaluation methods that testify to and foster educational excellence and institutional effectiveness in institutions across Trinidad and Tobago. The Council serves as a model for other areas of the world that may wish to establish quality assurance (QA) and quality improvement (QI) standards and processes. As a statutory body, ACTT has full authority to conduct institutional and programmatic reviews and has designed processes that build on the hallmarks of US institutional accreditation. ACTT now joins an increasing number of quality assurance agencies, linked through the International Network of Quality Assurance Agencies for Higher Education (INQAAHE), and other networks, that offers the potential for mutual recognition, an international web of institutions recognised as quality, and a vision of global access and mobility for students.

Nonetheless, neither ACTT nor any other quality assurance agency can ignore the now common list of competing internal and external drivers that reshape its work. Neither can it avoid the criticisms declaring that accreditation, quality assurance, and peer review are no longer credible and that higher education institutions are insular, self-referential, overpriced, and out of sync with societal purposes and needs. Access, accountability and transparency, consumer protection, degree completion, educational innovation, employment, and cost-effectiveness; these priorities have become increasingly compelling. They are. However, as productivity measures, they stand pitted against academe's and accreditors 'deeply valued standards of quality; i.e., educational rigor and substance, faculty autonomy and research, diversity of mission and purposes, education as a public or social good, and student learning and academic achievement. Productivity competes with quality and dueling versus dual priorities result: access can undermine student academic achievement, degree productivity can destroy educational excellence, consumer protection compliance requirements can trump rigorous quality assurance, and innovative practices, particularly when legislated, leaving accreditors no choice but to find ways to approve them, can undermine proven practice and sound scholarship in teaching and learning.

Accountability and efficiency drive the first priorities in each dueling pair; integrity and quality, the latter. Greater expectations for transparency on accreditation findings and institutional performance intensify the competing agendas, as few accreditors know what to say on what little is agreed on to be said publicly about colleges and universities. US accreditors scramble to explain to the public what they know. Yet their traditional indicators of educational and institutional quality, understood by academe, are obtuse to the typical student, parent, and legislator. When coupled with evaluation carried out through peer review, academe's QA and QI seem a game of good-old-boy dodge in comparison to bright-line standards clearly defined and consistently applied, to cost controls and regulation that assure consumer protection, and to President Obama's proposed cost-benefit-quality rating system for higher education institutions that promises the clear, understandable facts on the fit of an institution to the student. Is productivity quality? Must quality be productive? And so the debate goes back and forth, begging a definition for what is quality and a response to who gets to define it. The dueling

priorities render accreditors good candidates for becoming Dr Dolittle's double-headed Pushmi-pullyu of higher education, trying to accomplish both ends but often finding themselves speaking with rival voices in two very different languages. If accreditation takes just one side or the other, it risks becoming obsolete or being backed into the bureaucracy it was established to avoid, verifying important but often arbitrary specifics versus vouching for the whole of the institution and the quality of its educational enterprise.

The American Council on Education is right. If QA and accrediting agencies cannot speak clearly to their standards or criteria for academic excellence, cannot explain how quality is judged through the experience and reason of peer review, cannot assure the learning of a set of recognised outcomes and credentials, or communicate the results of evaluation findings on institutional performance, the second set of priorities in each duo above remains self-referential and invisible, and accreditation will fail both its private and public purposes. In fact, US accreditors have played an increasingly quasi or complete governmental role that reflects more of a ministry function with each new, expanded, or reinterpreted Federal regulation or compliance requirement. Perhaps the end of the story has already been written and the third-party agency dedicated to QA and QI through self-regulation separated from governmental purposes and requirements already lost.

While US accreditation sorts itself out or is threatened with replacement by an alternative system, ACTT's youth offers it great opportunity to learn from and intentionally build a system that addresses the issues hounding its US neighbour.

The lessons are straightforward. The lessons will force accreditation at minimum to rebrand, more likely to remake itself.

- Build accrediting processes and criteria with transparency and consumer information in mind.
- Expand the mission and purposes of accreditation to include processes, incubators, and criteria for innovation and collaboration.
- Expand the mission and purposes of accreditation to include affiliation or recognition processes for organisations involved in the academic enterprise or student support services of institutions.
- Design non-redundant peer review and automated review processes that are credible to both academe and the public and that effectively evaluate quality compliance, assurance, improvement, and innovation.
- Determine how, if at all, degree frameworks and common data sets on institutional efficiency, educational excellence, student learning, and student success (academic progression, achievement, and completion) will be integral to QA and QI.
- Establish a shared accreditation and affiliation data system that fulfills transparency needs and that allows for data analysis and benchmarking on institutional efficiency, educational excellence, student learning, and student success.
- Establish a student data record system that tracks student achievement, progression, civic contribution, and professional attainment throughout a lifetime of education across myriad institutions.
- Infuse predictive analytics and dynamic reporting processes as appropriate into shared data systems.
- Build both accreditation standards and credentialling systems with mobility and mutual recognition in mind.

Innovation. To be vital and credible, QA agencies must not simply embrace, but be the incubators for innovation anywhere in educational and institutional enterprise, testing, researching, and recognising new forms of quality even at the heart of academe and especially when they provide greater access, cost efficiency, and unbounded learning; i.e., particularly when they are more productive. Myriad articles make clear the challenges of the newest disruptive technologies; i.e., the novel short courses, accelerated degrees, MOOCs (Massive

Open Online Courses), competency-based direct assessment with PLA (prior learning assessment), and MMORPGs (Massive Multiplayer Online Role-Playing Games).

Yet, higher education has seen centuries of disruptive practices, creating them in fact, just as it has in great part with these. Granted, the pace of change is faster, and the new forms are likely just the first wave. Nonetheless, accreditation has always embraced diverse types of institutions, students, programmes, methodologies, and contexts, as well as the different levels, ranges of quality, and forms of excellence evident in those contexts. This is not a 'Pollyannish' perspective. QA agencies are tremendously resilient at being able to see and define indicators of quality across old and new forms of education, and peer reviewers, because they are the very individuals creating or participating in the future of teaching and learning for a host of different goals, will in time become the connoisseurs of these new educational art forms.

Affiliation. What make the new innovations so different are not the new educational forms; new educational forms are the business of high-quality education. Educators will hone these forms and abandon those that do not serve students and the good of society. It is the mashup of institutions, vendors, and online resources that allow for wholly new arrangements of educational offerings, teaching, learning, and research that appear to mock sound practices, known measures, and established players. These novel arrangements with new third-party players and highly influential investors disrupt the core of the institution, unravelling the teaching-learning, faculty-student, research-service stronghold. In fact, the influence of private venture capital linked with large, profitable corporations, non-profit foundations, and highly publicised, governmental goals sparks needed debates on whether institutions really govern themselves—or should, depending on the perspective taken.

The arrangements raise the question of what is and is not the institution, what is and is not the third party's versus the institution's programme or course, and even what is and is not a course or programme. What is being accredited and whose quality is being assured if there is not a recognisable institution, programme, course, administration, or faculty? If the institution is accredited, does that extend the stamp of approval to all the entities to which the institution has outsourced student support services, financial and HR processes, technology, remedial programmes, advising and placement, even teaching, learning, and the award of degrees? If without these third parties the institution cannot maintain its educational enterprise, does the institution alone remain accreditable?

If productivity and quality are to thrive as dual priorities, the real question is not whether, but how accreditors might embrace affiliations and establish processes for recognising credible third parties. Whereas the disruptive technologies and new forms of education have rattled pedagogical tradition, it is the new players, the new money, and the tangled contractual relationships and outsourcing that force rethinking of the wholes and parts. Even if operating with integrity and honour, some entity must weigh in on these new providers, new affiliations, and new contractual arrangements to ensure they commit and contribute to high-quality education, as well as efficiency measures. Who better than QA and accrediting agencies to develop and evaluate these players with indicators that balance both quality and productivity?

Degree Frameworks. Accreditors and institutions must soon determine how, if at all, degree frameworks and common data sets on institutional efficiency, educational excellence, student learning, and student success (academic progression, achievement, and completion) will be integral to QA and QI. According to the American Association of Colleges and Universities (AAC&U), more than 90% of the articulated goals and outcomes of higher education are shared despite the diversity of institutional missions. Bologna's Tuning Projects, AAC&U's essential learning outcomes, and the US's testing of the Degree Qualifications Profile (DQP) serve as a few examples among many.

As espoused, these frameworks allow faculty to define broad learning goals into

understandable, assessable learning outcomes or competencies. Frameworks provide a forum for faculty to work across disciplines to link their teaching, learning, and assessment of student achievement to these collectively defined outcomes, mapping a progression of learning and achievement to a known level of completion. If such has been demonstrated many times in faculty-driven curricular transformations, then finally, these frameworks will provide a tool that allows for, but bridges the diversity of educational offerings around the world. What remains then is simply a matter of creating clear definitions of shared credentials. Further, wasted time, wasted money, and bad actors (whether institutions or third-party providers) will be made public and eliminated. What use is the argument for the unpractical institutional complexities and time for a progression of learning when the flipside offers ends that can be more efficiently achieved and the goals of society, the professions, and the workforce advanced?

Thus, external stakeholders wonder how educators and accreditors have missed the true power of these qualification frameworks as summative tools that bind quality and productivity. Nonetheless, faculty proclaim that adoption of any framework leads to the homogenising of higher education, to a focus on consistency versus quality, to standardised testing versus deep assessments that reveal learning and focus on the educated mind, the developing scholar, the upstanding citizen, and the contributing professional. The frameworks must be aspirational and formative, not summative. Commitment to shared standards drives formative evaluation and continued improvement. Compliance to standardised outcomes or competencies drives summative evaluation that forces standardisation and a race to the "good enough" baseline threshold. The formative approach asks, "Are we sustaining and improving educational quality?" The summative approach answers the question, "Did we pass the test?"

The merits of both views may and will be argued by different audiences with differing perspectives, but the competing motivations cannot be missed and the strong views about the consequences on both sides are plain. Despite the arguments, accreditors must be leaders in facilitating which, if any, frameworks may serve both ends. All parties need to be at the table to discern if these frameworks, along with the added tools of prior learning assessment (PLA), appropriate outcome assessments, and a database that keeps track of what students have learned and can do, then a system of global access, mobility, and recognised completions is attainable.

Meaningful Data and Predictive Analytics. ACTT has a rare opportunity to make one of the most meaningful contributions to its citizens and all students: Establish dynamic, predictive data systems designed to fully and clearly articulate (a) institutional efficiency; (b) educational excellence; (c) student learning; and (d) student progression, civic contribution, and professional attainment throughout a lifetime of education across myriad institutions. Few examples exist anywhere and, for an industry that excels in research, higher education seems clueless about data and information.

US higher education suffers from student data systems built for individualistic purposes. Institutions organise their data to suit their students, missions and needs. Public and private systems of institutions have created their own shared sets of efficiency and effectiveness data to provide information on operations, educational programmes, human resources, enrollments, completions, and myriad other monitoring and screening elements. States have defined yet additional data systems that allow for collection and review of data for their own accountability and funding intentions. Of course, the Federal government's Integrated Postsecondary Education Data System (IPEDS) is built entirely on the obsolete notion of the first-time, full-time student, and as such, reflects the most traditional definitions of higher education and only 25% of all students. Accountability and transparency, two priorities shared by both state and Federal governments in the US, have driven the creation of Voluntary Systems of Accountability (VSA) and have fuelled expansion of several benchmarking projects. Naturally, these benchmarking and VSA efforts developed around different segments of institutions (associate degree,

baccalaureate, graduate; public, private; non-profit, for-profit) have somewhat alike and yet noticeably different data structures and reporting requirements.

Accreditors have not overlooked data. Every national, professional, specialised, and regional QA agency in the US layers on yet another set of data requirements, typically with annual submission expectations. The result has been a tremendously burdensome reporting schema overlaid onto every higher education institution in the US. It is a data schema (versus information warehouse) that is no longer (if it ever was) meaningful, useful, reasonable, or workable for any group. That is probably the biggest understatement of all. At best, the reporting is static and reactive with a few indicators used to flag potential issues at institutions or to give warnings (rarely early alerts) about students in trouble. Of course, there have been efforts to find common data sets, particularly across states and institutional systems, but the voluminous nature of both the data and the problem of sharing it is overwhelming.

There is hope around the corner. The National Student Clearinghouse bypassed everyone and invited institutions to join an integrated network of data that tracks student progression across multiple institutions. While accreditors have just polished off new criteria to evaluate institutions on their student persistence and completion rates, the Clearinghouse redefined the boundary from institution to student. In other words, while accreditors are poised to evaluate the institution on the numbers and percentages of students it has retained to a certificate, diploma, or degree, the Clearinghouse now provides compelling data on the vast majority of students across all types of institutions (+97% of all students at public institutions). The data provide clear information on the progression a student makes across his or her entire tenure in and out of higher education over six years (soon to be a decade and then a lifetime). Simply stated, the Clearinghouse tells the world what the student has achieved over time—the student progression in education versus an institution's accounting of one narrow window of time the student happened to be in attendance.

In all the other data systems and current measures, a student that transfers in or out of an institution or who takes courses at another institution for a year and then returns, is not only seen as not served, but is counted as a failure of the institution anytime there is not a semester to semester, quarter to quarter, or year to year retention. Even if the student completes a credential at another institution, all previous institutions must count this student as a non-completer. The result? Accreditors now find themselves counting student progression and success as an institutional failing.

Are the new efforts of QA agencies in persistence and completion for naught? No. Another hope rests in the capacity of a few dozen institutions that have figured out how to transform the static data already collected by institutions and the reactive reporting of that data into a system that predicts when students need someone to intervene to aid in their success. Further, the formerly static, reactive reporting shifts to responsive, just-in-time information by shifting the focus from collecting the data for later analysis to gathering and displaying real-time data dynamically every day at the level of student. It is the shift to the personalisation of data to student that makes the transformation possible. The data even communicate directly to students: "If you loved sociology, you'll also like cultural anthropology." "Your struggles with statistics and college algebra can be helped with this MOOC or MMORPG." Predictive, dynamic, personalised; it is completely unclear what it means yet, but it is certain that QA agencies need to become versed in it.

Accountability, Transparency, and an Expanded Mission for the Global Public. To adapt to external drivers, governmental demands, and public needs, QA and accrediting agencies have had to rethink and expand their fundamental responsibilities to include new priorities, but have had little chance to consider fundamental opportunities to expand their roles or to reconsider an entirely new set of standards for what constitute future quality. ACTT now

marks its full arrival into the network of agencies genuinely committed to high-quality education worldwide. It joins other organisations that are keenly focussed on rigour, substance, and value in higher education, but increasingly aware of needing to serve external audiences in new ways and to do so with transparency and meaningful information about the purposes, claims, and quality of higher education institutions. Even with transparency, will the information on evaluation findings be meaningful if it remains tied to the current standards that mean little to the public?

As said earlier, there is much disagreement about what little can be said. A global society requires students who move easily across borders, faculty who continue to collaborate internationally, and mutual recognition systems that make this possible. Access and mobility apply to information and meaningful knowledge about quality in higher education as well.

What if QA and accrediting agencies were to consider a fundamental opportunity to expand their roles beyond the responsibilities of quality assurance, quality improvement, and simple transparency of findings? Through networks such as INQAAHE, a new, rich resource of information about higher education is emerging. The mutual recognitions that are building the pathways for true global access and mobility for students are the same pathways that could allow for mobility of information about educational excellence and institutional effectiveness, for clear, intentional sharing and testing—for intentional mobility of new educational forms and strategies. The opportunity is even greater if QA and accrediting agencies were to engage in multiple, sustained collaborations with institutions to research compelling issues or to test a promising innovation. Without usurping the roles of other needed national and international educational organisations, accreditors might gather, mine, and speak to the best, benchmark, and emerging practices in member institutions. Of course, these think tanks, intensive discussions and white papers on the future, and demonstration projects are being done already; the sharing internationally and nationally already occurring and quite well in many cases. However, the work is often only episodic, tied to infrequent events versus it being a fundamental responsibility of agencies. Instead of being seen as prohibiting innovation, these agencies could become the entities expected to facilitate the cross-institutional research that studies the wealth of data from quality assurance and improvement processes, and the entities expected to convene the institutions and other stakeholders to test, experiment with, and disseminate the new definitions and practices of high-impact, high-integrity, high-quality education.

In the process, QA and accrediting agencies would shift or at least balance the dialogue that seems currently riveted on higher education failings, on whether one institution is "good enough," and whether accreditors are able watchdogs, capable of trolling the press for misbehaviour and of constructing standards to catch the bad actors. Granted, that may be a worthy role as well, but if so, there is an even greater need to balance the external dialogue with clear communication on all that is done well and accomplished by higher education. The point is to consider, to at least ask, if there is another logical, valuable role QA and accrediting agencies might play in the next decades.

Of course, there are downsides and risk of unintended consequences to fundamental opportunities; the lessons of Arthur Anderson, conflict of interest and misuse of information, should remain keen. Nevertheless, in the current dialogue on the need for QA and accrediting agencies to step up to the new cultures and contexts of higher education, there should be an inquiry on other ways they might step up to new roles and further deepen the value, credibility, and viability of accreditation. Just as these agencies have sought to create new quality assurance and improvement processes that enhance value, sustain rigour, and reduce burden for member institutions, there should be a place to consider new expectations for these agencies themselves—to become relevant, credible, and transformative as they have been in the past. Must the expectations for QA agencies be limited to quality assurance, quality improvement, and transparency of evaluation findings? Through peer review, these agencies evaluate hundreds of institutions in detail each year. As a result, there is the potential for an immense

bank of knowledge on educational effectiveness and a cadre of thousands of peer reviewers and hundreds of QA and accrediting agencies with the potential to link this knowledge across institutions and nations—offering global access and mobility to this resource. These agencies and their peer reviewers know quality and excellence, their complexities, contexts, and nuances in ways no other entity might. No agendas should count out accreditation's capacity to adapt to diverse institutions and their partnerships, new cohorts of students, educational innovations, and global alliances. If new roles are out of the question for QA and accrediting agencies, and transparency of findings is to be limited to baseline compliance and assurance results, then three questions remain: Who will speak to high quality and educational excellence? Who will offer access and mobility to meaningful information about the whole of higher education? What small groups of thoughtful people might bridge productivity and quality for a global public? The call for accreditation to find its place in the mix is here. The only wrong choice is not choosing.