REGIONAL ACCREDITATION’S IMPACT ON INSTITUTIONAL CHANGE

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Abstract

Regional accreditation is a vital component to doing business in U.S. higher education. While the culture of accreditation emerged out of necessity in the 20th century higher education landscape, the regional higher education associations were initially established to foster an active intellectual exchange among member institutions. The evolving demands of contemporary higher education have inspired the regional accreditation agencies’ shift from a culture of continual improvement through peer review, to a greater expectation of USDE-mandated accountability. This qualitative case study explored the dynamic between NEASC’s Commission on Institutions of Higher Education and a Roman Catholic, liberal arts, baccalaureate institution during a pivotal fifteen-year period at the College. Utilizing the framework of John Kotter’s 8-Step Process for Leading Change to analyze institutional self-studies, correspondence between the College and the Commission, and participant interviews, this study explored the change process at a NEASC member institution. Analysis of the results provides insight into the internal and external factors that led to a major change in the governance structure of the College, and the initial impact of the governance change. Recommendations are detailed which promote a proactive approach to the self-study review process, and a productive dynamic between the accreditation agency and member institution.

Keywords: NEASC, higher education, college governance, regional accreditation, change management, Kotter
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Chapter One: Introduction to the Study and Theoretical Framework

Regional accreditation is a vital component to doing business in higher education. Accreditation has practical implications for institutions of higher education, in that sustaining good standing with the regional accrediting body is a condition of federal funding and participation in federal loan programs. From the standpoint of reputation, it is virtually impossible to deliver a post-secondary academic program without regional accreditation. A baccalaureate institution that does not have the validation of the regional accrediting body would have difficulty recruiting and enrolling students (Wergin, 2005a).

Throughout contemporary higher education, competing regulatory demands are evident in the national debate that has ensued, related to the value of higher education; the appropriate role of federal and state government in higher education oversight; and the responsibility of the regional accreditation agencies in quality assurance of their member institutions. The United States Department of Education has called for greater accountability through accreditation oversight, as well as more transparency and expediency to protect the public interest. In turn, accredited institutions are compelled to evidence their compliance to USDE, state and accreditation benchmarks, adjusting structures and practices accordingly.

The purpose of this case study was to investigate how the cultural shift in regional accreditation has resulted in a subsequent shift in institutions of higher education, though examination of one Catholic, liberal arts college in New England.

Context and Background

The six accreditation associations operate privately and independently, but are recognized by the U.S. Secretary of Education for their authority and supervision of both public and private institutions: the Middle States Association of Colleges and Schools; New England Association of
Schools and Colleges; North-Central Association of Colleges and Schools; Northwest Association of Schools and Colleges; Southern Association of Colleges and Schools; and Western Association of Schools and Colleges (Lindsay, 2001).

Under the auspices of the Secretary of Education, accrediting agencies are charged to:

[…] consistently [apply and enforce] standards that respect the stated mission of the institution of higher education, including religious missions, and ensure that that the courses or programs of instruction, training, or study offered by the institution of higher education, including distance education or correspondence courses or programs, are of sufficient quality to achieve, for the duration of the accreditation period, the stated objective for which the courses or the programs are offered; (20 U.S.C. 2009)

Accordingly, the accrediting agency is charged with examining every aspect of the post-secondary institution that supports the educational mission. Key to the agency’s granting of accreditation is establishing that faculty, facilities and program curricula successfully support the institutional mission; that the institution presents a model of fiscal solvency that ensures its continuance; and that student outcomes reflect the stated mission of the institution.

This decennial self-study is one essential aspect to continued accreditation through one of the six regional accreditation bodies, which are, in turn, authorized by the Council for Higher Education Accreditation (CHEA). The Commission on Institutions of Higher Education (CIHE), of the New England Association of Colleges and Universities (NEASC) is the recognized accrediting organization for degree-granting higher education institutions in New England. The CIHE not only grants accreditation as mandated by the Secretary of Education, but also grants approval for substantive changes in academic programming, such as additional of new programs, delivery of higher degrees, and delivery of distance and online learning.
The emphasis in the decennial comprehensive report is a reflective process by which an institution may measure the effectiveness of its academic programs and the various components of the institution supporting the programmatic functions. During a three-day on-site study conducted by a visiting team of regional peers, each holding expertise in a particular aspect of institutional operation, the team forms an assessment resulting in a recommendation to the Commission. This recommendation informs the Commission’s decision to grant the College continued accreditation.

In some instances, the recommendation is less than favorable. In the last five years, four institutions have been placed on probation by the CIHE, mandating that the institutions evidence why accreditation should not be terminated. In all instances, the Commission found that the institutions did not meet the Standard on Financial Resources, and were prompted to provide a plan for future financial stability in order to maintain accreditation. While one institution remains on probation, two other institutions satisfactorily established a financial plan, and the Commission terminated the accreditation of the fourth institution, resulting in closure (Commission on Institutions of Higher Education, 2016).

An examination of the remaining U.S. accrediting agencies indicates that they operate in a similar fashion. Several issues emerge from the current function of institutional accreditation in the United States. At the inception of these agencies, they were charged with ensuring the legitimacy of institutions that claimed to deliver post-secondary education in a very liberal sense. Over the last century, the function of the accreditation agency has become increasingly more prescriptive in its supervision of higher education. As a result, the agency has in itself become a central change agent in institutional culture. Accreditation has become a central impetus for change in the traditionally change-resistant culture of higher education.
**Rationale and Significance**

The rationale of this study emerged from the researcher’s experiences with regional accreditation and the decennial self-study over the last decade. Having twice chaired decennial self-study committees for two Boston-area institutions, the researcher has long considered the dynamic between the regional accreditation agency and the member institution, as well as the perception of the accreditation process held by college faculty and administrators. With the dual purpose of continual improvement and accountability, the self-study participants (the agency staff; the visiting team of peers; and the college representatives) engage in an intriguing interplay largely defined by the purpose of the visit: to renew accreditation of the institution, with the visiting team and commissioners acting in both regulatory and consultative capacities. Due to increasing demands on the regional accreditation agencies by the United States Department of Education (USDE), the self-study process has incorporated additional regulatory components, which are reflected in revisions of the accreditation standards.

The recent functional shift in regional accreditation poses a challenge for institutions of higher education for a number of reasons. Throughout the higher education community, authoritative bodies are calling for change in the manner which the regional accreditation bodies conduct business. Most recently, the U.S. Department of Education has called for greater federal oversight of the accreditation bodies, and further standardization of the rubrics by which member institutions are evaluated and subsequently accredited (Eaton, 2010).

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) suggests that accreditation agencies explore either “assigning the more risky, litigation-prone elements of the gatekeeping function to a different quarter (e.g., a more independent entity or process created by accreditors collectively) or providing resources and/or indemnification to accreditors to reduce...

The American Council on Education (ACE) National Task Force on Institutional Accreditation posits that “the current role of accreditation as a ‘gatekeeper’ to Title IV funds with respect to institutional quality is appropriate and should be preserved” (2012, p. 18); as well as intimating that accreditors be empowered with the same “‘emergency power’ that enables [the Department of Education] to shut down an institution very quickly when presented with clear evidence of serious wrongdoing that is likely to harm students” (p. 23).

A change in the scope and function of accreditation bodies is underway, and uncertainty prevails regarding whether accreditors will assume a government-driven regulatory role, or maintain a collegial model (Eaton, 2012). The Department of Education seeks better regulation of higher education, and the public demands evidence of value and quantifiable outcomes in private, public and proprietary institutions of higher education. With the impending reauthorization of the Higher Education Act, initially slated for renewal in 2013, Congress has the opportunity to heed the advice of NACIQI and transform regional accreditation into a more prescriptive and standardized process.

This functional shift may find both the accrediting bodies and its member institutions woefully underprepared. An exploration in the impending shift in regional accreditation, as well as the institutional response to this change is beneficial to the higher education community, as accrediting bodies will be expected to guide institutional change in a more prescriptive manner, while institutions will need to make allowances in consideration for compliance with impending federal mandates.
The new era of oversight and accountability must take into consideration a long tradition of autonomy, and the diversity of missions under which United States institutions of higher education were founded. While still maintaining a culture of continual improvement among its member institutions, accrediting bodies will continue its role of gatekeeper for both academic quality and practical interest, such as Title IV funds.

An examination of accreditation’s evolution, as well as the way in which institutions respond to this new charge, contributes to a greater understanding of contemporary higher education.

**Research Question**

This investigation of the accreditation process is guided by one question that allows for a comprehensive study of the changing role of accreditation in higher education. This question characterizes the way in which accreditation inspires change in higher education and project the future of the accountability movement in education. *In what way does the cultural shift in accrediting bodies result in a subsequent shift in colleges and universities?*

A key component of this study involves the last two decennial self-studies of a small New England college and the manner in which the self-study narrative has shifted from an anecdotal document to an examination supported by data, assessment, and outcome-based matrices.

Ultimately, this exploration of the accreditation process brings to light several considerations for the successful accreditation self-study, informed by the 1999 and 2009 reports of one college.

**Key Terminology**

**NEASC:** The New England Association of Schools and Colleges, established in 1885, is the member organization for 2,000 public and independent schools, colleges and universities. NEASC is comprised of four commissions: the CIHE; the Commission on Independent Schools...
(CIS); the Commission on International Education (CIE); and the Commission on Public Schools (CPS).

**CIHE:** The Commission on Institutions of Higher Education is the regional accreditation agency for 242 institutions of higher education, as well as 11 international institutions.

**USDE:** The United States Department of Education

**NACIQI:** The National Advisory Committee on Institutional Quality and Integrity was established under the Higher Education Act to review and provide status recommendations for the U.S. regional and professional accreditation agencies. NACIQI provides advice, guidance and recommendations to the U.S. Secretary of Education.

**CHEA:** The Council for Higher Education Accreditation recognizes and guides sixty accreditation agencies, promoting and advocating on the membership’s behalf.

**Comprehensive Evaluation (Decennial Self-Study):** In the spirit of periodic review, NEASC member institutions undergo a comprehensive self-study every ten years, consisting of creating of a 100 page narrative; a three-day visit by a team of peers; a visiting team report on findings; and a recommendation related to continued accreditation to the CIHE.

**Interim (Fifth-Year) Report:** Member institutions provide a 50 page narrative on the progress in areas of concern highlighted during the comprehensive evaluation.

**Focused Study:** When there are significant findings related to a member institution’s operation, the CIHE requests a focused study (sometimes accompanied by a site visit) to investigate the issue and observe steps for remediation.

**Progress Report:** In 2-3 years following the comprehensive evaluation, the CIHE may request a progress report on a particular area of concern to apprise the Commission of the institution’s progress.
Visiting Team: Volunteer faculty and administrators from peer institutions, selected by the Commission to perform the self-study in the spirit of periodic peer evaluation.

The next section of this report provides an overview of the theoretical framework that guided this research. John Kotter’s (1996) Eight-Stage Process of Creating Major Change provides a construct by which to consider the change process depicted in the institutional case study.

Theoretical Framework

In the Self Study Guide (2013) published by NEASC’s Commission on Institutions of Higher Education, the self-study process is characterized as a comprehension evaluation with a two-fold purpose: to ensure quality assurance, while establishing a plan for institutional improvement through a process of self-analysis (p. 7). Inherent in this statement of purpose is the assumption that the college is not a static body that has discerned a successful process by which to achieve the institutional mission. Instead, the successful college consistently improves processes and promotes a dynamic culture of continual improvement and change. The golden ideal professed in the college mission statement is an aspiration rather than an achievement.

Therefore, change theory provides an apt template to consider the manner in which the university maintains a dynamic culture. Change does not reside in the self-study product, but serves as the measure of success. Instead, institutional change and the culture of continual improvement exist in the college community’s process to improve policy and programs for the purpose of mission fulfillment. The college mission statement drives the institutional operation, while the standards for accreditation are guiding principles through which the level of success is quantified.

The foundation of change theory is commonly attributed to Kurt Lewin’s (1951) three-step change model, comprised of unfreezing, change and refreezing as stages of change
implementation. Lewin’s initial work is limiting in scope, as three-step process for change implementation presumes an environment devoid of dissent, where decisions are rendered and perfectly executed (Rosch, 2002).

However, organizational change in higher education more likely involves a series of changes in order to contribute to a large-scale cultural shift. Moreover, traditional college communities enact change through committee and consensus, rather than executive decision. The environment where change occurs presents challenges and hindrances to the change process. In the college community, these opposing forces are ubiquitous in every change initiative. Ultimately, the accrediting body is the external influence that ensures that driving forces prevail, and change is implemented. Colleges must also maintain equilibrium between the external agency’s demands (the accrediting body) and institutional culture. As Lindsay (2001) claims, regional accreditation has incorporated a goal of continuous improvement among member institutions as central to programmatic obligation (p. 249). In consideration of successful change implementation, the nature of the process is a crucial component.

Implementing a perpetual cycle of change, and the infrastructure to promote it, pose a challenge to the change-resistant culture of many college and universities. Instead of integrating long-term strategy to ensure continuity of change initiatives between decennial reviews, many institutions are susceptible to reactive change efforts in the face of an impending self-study. Wergin (2005b) suggests that generally, institutions have not internalized the importance of quality assurance and continual improvement indicators, such as assessing student learning outcomes (p. 31). Resultant changes tend to be fleeting and lack the follow through necessary to realize the long-term benefits.
In order to implement sustainable organizational change, Lewin (1951) notes great benefit in establishing “an organizational setup which is equivalent to a stable circular causal process” (quoted in Rosch, 2002). A circular process answers the accreditor’s call for continual improvement, allowing for regular assessment of institutional aspects.

John P. Kotter’s Eight-Stage Process for change, first introduced in his 1996 book *Leading Change*, provides a template by which the university may enact successful and sustainable change. While relying heavily on preceding change theorists, Kotter’s model for change resonates with organizations due to its comprehensive approach to enacting an effective and lasting change campaign.

An author of numerous books on organizational leadership and a Professor of Leadership (Emeritus) at Harvard Business School, Kotter’s work primarily focuses on the change process through preparation, implementation, and follow-through to ensure sustainability of the change. Through extensive research on change initiatives within organizations, Kotter conducts an analysis of common reasons why organizational change fails, highlighting eight common errors (1995).

The eight common errors in implementing change include:

- Allowing too much complacency
- Failing to create a sufficient powerful guiding coalition
- Underestimating the power of vision
- Undercommunicating the vision by a factor of 10 (or 100 of even 1000)
- Permitting obstacles to block the new vision
- Failing to create short-term wins
- Declaring victory too soon
• Neglecting to anchor change firmly in the corporate culture

First featured in the 1995 *Harvard Business Journal* article, “Leading Change: Why Transformation Efforts Fail”, the popularity among readers of Kotter’s eight common errors led to the publication of *Leading Change* the following year, featuring the Eight-Stage model.

**Kotter’s Eight-Stage Process**

John Kotter’s *Eight-Stage Process of Creating Major Change* has inspired a dozen books by the author, in addition providing the basis for numerous higher education organizational studies.

1. Establishing a sense of urgency

   • Examining the market and competitive realities
   • Identifying and discussing crises, potential crises or major opportunities

2. Creating a guiding coalition

   • Putting together a group with enough power to lead the change
   • Getting the group to work together like a team

3. Developing a vision and strategy

   • Creating a vision to help direct the change effort
   • Developing strategies for achieving that vision

4. Communicating the change vision

   • Using every vehicle possible to constantly communicate the new vision and strategies
   • Having the guiding coalition role model the behavior expected of employees
5. Empowering broad-based action

- Getting rid of obstacles
- Changing systems or structures that undermine the change vision
- Encouraging risk taking and nontraditional ideas, activities, and actions

6. Generating short-term wins

- Planning for visible improvements in performance, or "wins"
- Creating those wins
- Visibly recognizing and rewarding people who made the wins possible

7. Consolidating gains and producing more change

- Using increased credibility to change all systems, structures, and policies that don't fit together and don't fit the transformation vision
- Hiring, promoting, and developing people who can implement the change vision
- Reinvigorating the process with new projects, themes, and change agents

8. Anchoring new approaches in the culture

- Creating better performance through customer- and productivity-oriented behavior, more and better leadership, and more effective management
- Articulating the connections between new behaviors and organizational success
- Developing means to ensure leadership development and succession (Kotter, 1996, p.21)
In prefacing his eight-stage process, Kotter highlights the challenges and assumptions that an organization must overcome to enact successful change, as well as the contemporary realities that make change necessary to organizational viability.

The most important consideration in enacting successful change involves understanding the organizational culture, including the mission-specific drivers and motivations that have contributed to its establishment and continuance. For many key members of the organization, the status quo may be satisfactory; after all, for many institutions of higher education, the blueprint for mission implementation has changed little for decades, and even centuries.

In recognition of this reality, Kotter stages the change process utilizing the sensibility of Lewin’s three-step change model (1951), while not referencing it directly:

The first four steps in the transformation process help defrost a hardened status quo. If change were easy, you wouldn’t need all that effort. Phases five to seven then introduce many new practices. The last stage grounds the changes in the corporate culture and helps make them stick (1996, p. 22).

The campaign characterized in the first four steps of Kotter’s model recognizes the importance of confronting the status quo; internalizing the message that the current state of affairs is not satisfactory for the successful continuance of the organization; and persuading key influencers that change is necessary in the business model.

However, additional cultural obstacles exist in implementing the change campaign, which require further assessment and strategic focus. Change is rarely welcome when it involves disrupting the organizational culture, and addressing the currently entrenched dysfunction. Underestimating the power of complacency and comfort with the status quo, especially in organizations with longevity, kills change campaigns in their inception. In order to instill the need
for change across the organization, a crisis and responding remedy must be brought to the forefront to motivate cooperation and action (Kotter, 1995, p. 60).

Above all, Kotter highlights the singular factor of Globalization as the impetus for all organizations to seek change, which is particularly relevant to institutions of higher education. The impact of educational technology; maturation of markets in developing countries and former communist regimes; and international economic integration (Kotter, 1996, p. 19), are primary influences that necessitate considerable change in higher education models. While these considerations provide greater access to both institutions and students, they also broaden competition, as the rise of the proprietary institutions over the last decade has established. Despite a sentiment in the Academy to preserve current practices in place for centuries, change is crucial in response to the dynamic global stage.

Kotter’s Eight-Stage Process is a response to these realities. Organizational transformation takes many forms, but the elements highlighted in Kotter’s process remain constant to successful change campaigns.

Establishing a State of Urgency. Kotter begins the change process with the need to create a sense of urgency throughout the organization, rather than simply identifying a problem and proposing a solution; or procedure by which a presently existing process is made more efficient.

The primary obstacle to starting an effective change campaign is complacency or satisfaction with the status quo. Often, leadership unwittingly hinders a change campaign through creating impressions both internally and externally which emphasize successes and fail to acknowledge areas that require refinement. This “happy talk” from senior leadership flies in the face of the impetus for organizational change (1996, p. 41). Why advocate change when messaging indicates nothing but success?
A secondary issue is related to the performance indicators by which an institution measures success. Obviously, low or misplaced internal benchmarks may point to overall organizational success. However, when measured by a different yardstick, the organizational outlook may be quite different. In this sense, the utilization of aggressive, expansive, even aspirational goals becomes important to continued organizational growth. Secondly, using metrics such as data from peer institutions, as well as external indicators such as client satisfaction provide a very different organizational outlook (1996, p. 44).

The utilization of external indicators to increase urgency is particularly relevant in higher education, and the transformational change often expected under the auspices of regional and professional accreditation bodies. Kotter underscores of external forces for internal leverage in *A Sense of Urgency* (2008), highlighting the necessity to “bring the outside in” (p. 60); a radical shift in internal reality can occur when external bodies, such as an accreditation team, identify areas in which the institution falters. Complacency and satisfaction with the status quo quickly dissipate when faced with additional perspective.

**Creating a Guiding Coalition.** While one person, such as the president or CEO is publicly associated with an institutional or corporate transformation story, change campaigns will inevitably fail if only a few people are involved in the change visioning and implementation (Kotter, 1996, p. 53).

Effective buy-in to a change campaign results from a strategically selected guiding coalition, who embodies a combination of position power, expertise, credibility and leadership (Kotter, 1996, p. 57; Kotter, 2010, p. 79). In tandem with the right combination of people is the necessity of strong leadership to push the initiative forward. The team leader doesn’t necessarily need to be the president. However, senior leadership or middle-management will likely get more traction
with this process, rather than an external consultant or human resources representative (Kotter, 1996, p. 59).

The guiding coalition must nurture two additional factors to increase the likelihood of success: foster a culture of mutual trust within the coalition; and establish a common goal or guiding principles in which the coalition is unanimously invested (Kotter, 1996, p. 66).

The charge of the guiding coalition not only involves fleshing out the vision of the change campaign, but also implementing and maintaining the shift throughout the organization. Due to these factors, this strategically chosen group must include influencers which represent every aspect of the organizational infrastructure.

In light of accreditation’s importance, institutional commitment to change may be perceived as forced through an external influence, rather than solicited through the requisite buy-in to the inherent value of the change. In order for the proposed change to have a lasting effect, the latter must be fostered in spite of an external mandate. Without a lasting commitment in the college community, whether by failure to ensure buy-in by individuals or insufficient resources to promote continuance, termination of the change agent’s helping relationship will result in termination of the change initiative. Inadequate institutional commitment is indicative of the reactive changes that take place before a decennial review.

Buy-in is crucial not only for the individuals directly impacted in the change process, but also for those who have indirect roles in the functional change. Lippitt, Watson and Wesley (1958) recognize the need for interdepartmental commitment to change initiatives, suggesting, “the more widespread imitation becomes, the more the behavior is regarded as normal” (p. 59).

**Developing a Vision and Strategy.** The visionary leader who disrupts the status quo brokers a strategy that is imaginable, desirable, feasible, focused, flexible and communicable (Kotter,
Above all, the institutional vision must be feasible to not only the guiding coalition, but also both internal and external stakeholders. The direct and indirect impact of the newly realized strategy must be explored and debated. Ultimately, will the vision and subsequent strategy both capture the imagination of the organization, and further its mission and goals?

Kotter emphasizes that the change vision must capture both hearts and minds in order to ensure full investment. Despite the inevitable opposition, a clearly communicated, attainable vision will be fully realized with proper preparation and implementation (Kotter, 2010, p. 102-103). In the realm of higher education, adherence to the institutional mission and core values is a paramount concern, especially in the face of a change campaign. Yet another litmus test for the change vision entails assurance that its impact will not only reflect but also bolster the institutional values and mission (Kotter & Whitehead, 2010, p. 130-131).

**Communicating the Change Vision.** In any change campaign, broad communication of the vision is a critical juncture in the process, in that improper implementation may thwart progress. Kotter diagnoses failure in communication as first dependent on successful implementation of the first three stages of the process. If a culture of urgency doesn’t exist; the right people aren’t part of the guiding coalition; and the vision and strategy isn’t fully realized and embraced, communication of the change vision is doomed to failure (Kotter, 1996, p. 86).

Even still, obstacles exist in the communication campaign, as limited occasions for change vision communication (a speech, newsletter, or presentation) won’t result in internalization of the change strategy. Simple, relatable, jargon-free communication in multiple forums must be integrated into the daily business of the organization (Kotter, 1996, p. 90).

Rhetoric alone isn’t sufficient. Behaviors must change throughout the organization. Senior leadership must lead by example. In addition, communication must prove dynamic, with all
stakeholders having the opportunity to engage in dialogue regarding the change campaign (Kotter, 1996, p. 95-100).

In “Standard Three: Organization and Governance”, NEASC’s Commission on Institutions of Higher Education validates the need for broad communication of these initiatives, characterizing the necessity of communication among the board and the various constituencies of the institution (CIHE, 2011, 3.1). In addition, emphasis is placed on a culture of consultation, which ensures that “the institution’s internal governance provides for the appropriate participation of its constituencies, promotes communications, and effectively advances the quality of the institution (CIHE, 2011, 3.9). In addition to the pragmatic need for communication in order for a change campaign to take effect, institutional practice must involve broad, dynamic, participatory communication.

**Empowering Employees for Broad-Based Action.** Leading into the substantive implementation of the change campaign, it is expected that leadership would enable personnel throughout the organization to enact procedural shifts reflective of the change strategy. However, the proactive leader must predict and resolve hindrances to change to not only enable but empower employees in successful transition.

Kotter outlines several barriers of change worthy of consideration, illustrating that real change involves both a shift in organizational culture and structure. He includes among the barriers to empowerment formal structures and systems which impede action; managers who discourage subordinate action; and a lack of necessary skill sets (Kotter, 1996, p. 102).

Encountering such obstacles appears to compound the breadth of the change campaign. With a powerful guiding coalition and strategic implementation, these barriers can be overcome through dynamic dialogue, employee training, revamped systems and new personnel (p. 115).
Above all, alignment of systems and personnel to promote change is essential. Kotter emphasizes the continuance of the communication campaign in this process, as well as the flexibility to change procedures and roles as the situation dictate (Kotter, 1990, p. 60; Kotter, 1996, p. 110). When dealing with detractors from the change implementation, it is necessary to engage in direct, frank dialogue to relate the reality of the inevitability of change, as well as the need to partake to ensure continued success in the organization (Kotter, 1996, p. 113).

**Generating Short-Term Wins.** In any expansive, long-term campaign, the small successes have numerous benefits for the organization, including validating the course of action, boosting morale, and preserving momentum. In addition, short-term wins assist in persuading remaining detractors to embrace the change campaign.

Small successes allow organizational leadership the opportunity to recognize both the efforts of individuals involved in the process and reaffirm the viability of the course in a tangible and highly visible way (Kotter, 1996, p. 122). In addition, allowing for these opportunities enables the guiding coalition to assess and redirect strategy as necessary, in light of the initial results from the initiative.

Celebrating these small victories in a public sense bolsters the confidence in the course of action, and preserves the momentum necessary to continue the campaign. This provides the motivation for the organization to persist in a course of action. Lastly, the remaining resisters may not be fully convinced of the process’ efficacy, but they are less likely to actively oppose an initiative with early evidence of success. “As a general rule, the more cynics and resisters, the more important are the short-term wins” (Kotter, p. 123).

**Consolidating Gains and Producing More Change.** As a change campaign takes effect, residual issues will emerge in light of organizational shifts, underscoring the importance of
continued vigilance. In light of organizational movement, processes become superfluous or obsolete, personnel roles change, and prioritization of resources may merit a reassessment. Kotter characterizes these shifts as the “interdependent systems” in organizations; a change in one procedural aspect impacts numerous areas, necessitating further change (Kotter, 1996, p. 136).

Higher education continues to experience organizational shifts among interdependent systems, in light of several considerations that have emerged in recent decades. The emergence of educational technology and online learning has necessitated a shift of resources, additional skill sets required of faculty members beyond disciplinary expertise, and new operational considerations, especially in the area of student services. Institutions that integrate online learning into the academic program will falter if the operational systems, built for on-ground learning, remain unchanged.

**Anchoring New Approaches in the Culture.** With successful change implementation, the organizational culture, or norms of behavior (Kotter, 1996, p. 155) inevitable must adjust to ensure sustainability. Three areas of focus are relevant to the culture change: further adjustment of procedures and systems to reflect the new organizational emphases; establishing the causal connection between culture change and successes through continued communication; and professional development and strategic hiring to ensure a succession plan.

Kotter characterizes the shift of culture enacted through organizational change as reflective in a shift of priorities related to front-line service: responsiveness to clients, flexibility and decision making power among the service personnel, and an emphasis on quality (p. 149). Implementing these procedural shifts is related to the broader strategy to anchor change culture. Current employees will require continued professional development and training. New hires will reflect the skills requisite of the new order. Both emerging leaders and leaders new to the organization
will need to embrace the facets of the new culture (p. 155). In this way, the new culture becomes embedded in the organization, and eventually replaces the former organizational culture.

**Criticism of Kotter**

Kotter’s change model draw the most criticism related to the linearity of the model, the minimalized role of the employee in the process, and the rigidity (as opposed to fluidity) conveyed in executing each stage.

In *Leading Change* (1996), Kotter stages each of the eight steps as distinct, finite processes, with little revisiting of previous aspects once a phase is completed. Critics question whether proceeding in this way accurately reflects a realistic change campaign. Institutional change is rarely sequential and unwavering in its execution; unanticipated obstacles inevitably disrupt the process.

Secondly, little consideration is made for “rank-and-file” employee’s contribution to the model, instead depending on influencers and leaders to envision, broker and implement, leaving the rest of the organization to follow.

Kotter’s 2014 refresh of the 8-Step Process, *Accelerate*, addresses many of these concerns. In the process revision, there are allowances for phases which run concurrently as well as continuously throughout the change campaign. Far more attention is devoted to working outside of the traditional organizational structure in order to enact change. In addition, stakeholders at all levels of the organization are encouraged to advocate both horizontally and vertically in the organizational structure to enact strategic change (Kotter, 2014).

**Relevance to Higher Education**

While few institutions of higher education are likely using Kotter’s Eight-Stage Process as a blueprint for change management within their organizations, many of the characteristics of
Kotter’s process are evidenced within the successful transformational cycles that occur. Therefore, there is value in studying change campaigns in higher education, and the influencers that motivate these changes, through Kotter’s lens.

Kotter’s approach to change strategy is comprehensive in considering both the opportunities and obstacles involved in any organizational structure. The recurring theme evident throughout Kotter’s work is that organizations, and the people who comprise them, are naturally resistant to change. However, Kotter’s emphasis on the necessity of change is still relevant fifteen years after initial publications. The realities of globalization, technology, and greater demand have impacted higher education in a manner that has necessitated wide-scale transformations of the entire organizational plan. One of the greatest challenges for institutions is the preservation of the mission and values that define the community culture in the face of major change.

NEASC, as well as other accrediting bodies in higher education, recognize this need for change, as reflected by its emphasis on continual improvement. Through the NEASC cycle of review, institutions realize the impetus to adopt a dynamic culture that ensures the quality and relevance of the academic program.
Chapter Two: Literature Review

Many factors drive change within higher education. Considerations, such as market demand, technological advances, and new elements such as the emergence of mainstream for-profit institutions and competency-based education, have compelled the academy to rethink traditional business models. Largely due to the diversification of higher education, regional accreditation is of paramount importance for several reasons. While the loss of prestige is significant to institutions that are recipients of public censure, probation, or loss of accreditation, the practical implications weigh heavily as well.

While the federal government has depended on regional accrediting bodies to recognize and approve institutions of higher education for a century, accreditors took a more active role in validating for federal fund dispersal through the 1952 Korean War G.I. Bill (Brittingham, 2009; Finkin, 1994); throughout, the Department of Education largely deferred to the accreditor’s judgment in discerning acceptable standards for institutions. Similarly, accrediting bodies have relied on the member institutions to set standards for higher education, promoting a culture of self-regulation.

The evolution of both the accrediting bodies’ role and its relationship with the federal government has significant impact on the member institutions. As the spirit of quality assurance through self-regulation has sustained accreditation from its inception, a greater emphasis on oversight and accountability calls for more prescriptive measures and, at times, institutional mandates.

The cultural shift in accrediting bodies is relevant to the study of change on the institutional level. To better understand the potential difficulty in more prescriptive federal oversight of accreditation, and in turn, institutions of higher education, it is worthwhile to explore the
evolution of regional higher education associations; their assumption of the accreditation function; and recent national higher education accountability movement. This treatment will focus on the evolution of the New England Association of Schools and Colleges, as well as the Commission on Institutions of Higher Education, as it was both the first association to convene, and the last association to formally articulate the accreditation function (Brittingham, 2009).

The following pages will explore the origin of the accreditation function; the regional higher education organization (specifically NEASC) as a council of member institutions, focused on the exchange of intellectual discourse regarding academia’s role in society; the transformation of the organization through assignment of the accreditation function, made more explicit through stewardship of federal funds, as mandated by Title IV of the Higher Education Act of 1965; and the accountability movement in higher education, and the manner in which the “triad” (regional accrediting bodies; state regulators; and federal regulators) will undergo a redefinition, entrusting accreditation with greater regulatory authority.

Origins of Accreditation

The need to organize and broadly confer about practice and policy among educators has existed nearly as long as educational institutions in the United States. The New York Board of Regents first established in 1784 to provide oversight of King’s College (Columbia University) as well as other educational institutions in the state. “The Regents were empowered and required to visit every college in the state yearly, to register each curriculum at each institution, and to report yearly to the legislature” (Harcleroad, 1980).

While the American Medical Association is cited as the first establishment of a nonprofit discipline-specific education association (professional accreditor) which convened a common set
of institutions in 1847, the organization exerted little control or influence over issues or study or practice until the turn of the century (Harcleroad, 1980; Orlans, 1975).

With the establishment of the Federal Office of Education in 1867, more concerted effort was devoted to identifying and gathering information on the colleges operating in the United States. However, the Office’s early work did little to ascribe standards by which to measure institutional criteria (Blauch, 1959). While the Commissioner of Education’s 1870 report accounted for 369 collegiate institutions, the total swelled to 602 institutions by 1910 (Blauch, 1959; Harcleroad, 1980). Predicting the need for better oversight of collegiate institutions, Kendric Babcock, the Office of Education’s educational specialist wrote in 1912, “To deny that the term [college] is fully applicable to any institution calling itself a college is to offer serious affront to individuals connected with the institution… Yet definition… is absolutely necessary if an institution is to deal honestly with the great public… [and] students” (Orlans, 1975).

Other organizations sought to compile national lists of colleges, albeit for different purposes. The Carnegie Foundation for the Advancement of Teachers (1905) sought to determine institutional eligibility in its faculty retirement program, funded by a ten million dollar Carnegie Foundation grant (Alstete, 2007), using benchmarks such as “endowment, admissions and graduation requirements, and number of faculty members” (Blauch, 1959), but did not seek to accredit institutions. However, industry standards such as Carnegie classification and the Carnegie unit emerged from the Foundation’s institutional reviews.

The institutional membership list compiled by the Association of American Universities (AAU) took on greater significance when German universities adopted its 117 institution membership roll to determine admission into graduate programs in 1913 (Harcleroad, 1980; Orlans, 1975). Seeking to expand the college list beyond its membership, the AAU called upon
the Office of Education to publish a definitive list of United States colleges for the purpose of validating readiness for graduate coursework. Babcock developed a list in which he classified 344 institutions, rated Class I to Class IV (total readiness to total unpreparedness for graduate work). Understandably, the list provoked protest among institutional leaders, leading both Presidents Taft and Wilson to suppressing the report (Harcleroad, 1980; Orlans, 1975).

Another association in the vanguard of the accreditation movement was the American Association of University Women (AAUW). Utilizing factors such as size of the institution and its endowment, quality of curricula, and membership in the Carnegie group, AAU, and regional associations, the AAUW devised an institutional list to determine graduates who qualified for membership (Orlans, 1975). Both the AAU and the AAUW ultimately terminated this activity with the establishment of the National Commission on Accrediting and the regional organizations.

Amidst the national efforts to organize college institutions, institutions of secondary and higher education were compelled to organize regionally, primarily to establish a common set of curriculum prerequisites necessary for college admission. The North Central Association (NCA), established in 1895, moved to conduct accreditation of secondary schools by 1905; developed college accreditation standards by 1909; and published a list of accredited institutions by 1913. Guided by the earlier work by the U.S. Office of Education and Carnegie Foundation, the NCA developed a set of quantitative measures to determine membership in the regional body. By 1934, the North Central Association abandoned a narrow, criteria-focused review for a broader, mission-oriented approach, which evolved into a standard decennial evaluation of member institutions by the 1950’s. In the ensuing decades, the mission-centered system of periodic review and accreditation would provide the template for the other five regional associations as
they assumed accrediting responsibilities (Alstete, 2007; Blauch, 1959; Brittingham, 2009; Orlans, 1975).

Inception of NEASC

The New England Association of Schools and Colleges is credited for establishing the first regional association to influence secondary and higher education policy, and the last to assume accreditation responsibilities, in relation to the six regional accreditation bodies currently in existence.

The New England Association of Schools and Colleges was established through the leadership of the Massachusetts Classical and Teachers’ Association- John Tetlow, Girls’ High and Latin School; Ray C. Huling, Fitchburg High School; and William C. Collar, Roxbury Latin School- who enlisted the support of President Charles W. Eliot of Harvard College (Moore, 1986).

In late 1884, the three aforementioned preparatory leaders formed a committee at the behest of the Teachers’ Association “to propose to the heads of the New England colleges a conference with the preparatory teachers for the mutual consideration of existing difficulties” (Moore, 1986). The fifty-one delegate meeting assembled in October 1885 to discuss better coordination of preparatory schools and colleges; the articulation of required preparatory curriculum and establishment of college entrance examinations were among the first topics debated (p. 16). In fact, the delegation’s “mutual interests in ensuring the preparatory and secondary school graduates were ready for college” (Brittingham, 2009) were both the impetus for collaboration, and the central topic of discussion for the first several meetings. As such, the culture of self-regulation was established from the association’s inception.
At the October 1885 meeting, President Eliot also expressed the need for examinations for college admission, an idea which eventually led to the establishment of the College Entrance Examination Board (Moore, 1986). Under this initial charge, the New England Association of Colleges and Preparatory Schools was established, limiting its membership presidents and heads of New England colleges and schools, or their designees (p. 17). A majority of the annual meetings’ agenda was devoted to discussion of college examinations for the first three years of the Association, although secondary school teachers training, as well as curricula in both secondary schools and colleges were among the topics of papers delivered (p. 20-21).

The annual meeting proceedings for the first two decades of the twentieth century remained topical (the 1891-1909 minutes were lost), largely standardizing the organization of the new association, the secondary to college transition, and secondary teacher training in the colleges. Reflective of the expanded breadth of discussion and institutional membership, the Association changed its name to the New England Association of Colleges and Secondary Schools in 1914 (Blauch, 1959). In 1918, conversation turned to the concept of the “Modern School” and the progressive education movement, debating the potential impact of the movement on New England secondary education, and subsequently, college preparation (Moore (Moore, 1986).

Discussions of the progressive education movement among the membership marked a significant turning point in the development of the Association. Dialogue regarding “The Modern School” led to the assignment of a committee to not only explore the growing movement, but also to “find a common ground for synthetic action” (p. 29) by the Association. In this way, the body began to move beyond mere discussion of common issues confronted in secondary and higher education institutions, as well as appropriately respond to evolving educational practice in the early 20th century. Dialogue addressing college preparation and admission; the college
curriculum; and new movements in education led to the formation of committees for Standards in Secondary Schools and Standards for Colleges, significant in the move to greater academic consistency among member institutions. In this way, the Association both signaled a desire to exercise greater oversight of academic standards, in addition to differentiating between secondary and college interests in its proceedings.

In the December 1927 meeting, the Association further stratified its function and operation through the formulation of standing committees on institutions of higher education; private secondary schools; and public secondary schools. The committees were charged with:

1) advising and assisting the executive committee of the association in matter pertaining to relationships between the association as a whole and its special area.

2) formulating and presenting to the association, for time to time, standards for institutions in its special area; and “upon request, to certify to the executive committee in writing their approval of any institution […] as eligible for membership in the association, if they do so approve” (Blauch, 1959).

In the spring meeting of the following year, standards for formal Association membership were set forth, which led to significant expansion of the membership, totaling 12 colleges and universities, 25 independent secondary schools, and 17 public secondary schools in 1928 (p. 48). At this meeting, the topic was “Standardization as a Function of Regional Associations” with the subtopic, “Should There Be a National List of Approved Colleges and Universities?” (Moore, 1986). The introduction of terms such as standardization and approval began to define the function and purpose of the Association in the years to follow.

In the ensuing years, the membership rolls of the organization grew, with 347 individual members and 199 institutional members by the December 1935 meeting (p. 48). By 1937, greater
delineation among the membership also transpired, with each subset electing its own membership
to both standing committees and the executive committee (p. 51).

Between the close of the 1930’s and the dawn of the 1940’s the Association meeting
summaries indicate several issues, which would prove prevalent for the organization in the
decades to come. Given the need to both align efforts and contribute to both national and other
regional organizations, the executive committee established the Committee on Interrelations.
Contribution to the New England College Entrance Certificate Board; the New England Council
and the American Council on Education both enriched the educational dialogue regionally and
nationally, as well as recognized the need to standardize approaches to secondary and higher
education. For instance, the prospect of a “uniform college admissions blank” (p. 53) was the
topic of discussion for both the Association and the American Council on Education, to which
New England sent a representative.

In addition, it was decided at the 1940 meeting that “the Executive Committee [should]
appoint a committee to study the relation of the New England Association of Colleges and
Secondary Schools to adoption of a policy of accreditation” (as quoted in Moore, 1985, p. 53).
Although the Committee on Accreditation later reported its unanimous decision to take no action
on behalf of the Association, the Committee acknowledged that several Association members
were in favor of formal accreditation and welcomed them to contribute to the final report (p. 55).

A more significant shift in the Association’s role and responsibilities occurred in the shadow
of World War II, as the organization sought to support the war effort and its students departing for
service at the beginning of the decade, as well as education for returning veterans thereafter.

In the summer of 1942, a special association meeting was called expressly to consider
awarding of secondary and college credit for Army Institute coursework, including
correspondence courses. With the American Council of Education already studying a means to quantify credit for Army coursework, the Institute sought validation of the regional associations on behalf of their member institutions (p. 55). Given the Army Institute had requested up to eight semester hours for training, the Association agreed “in principle.” It ultimately determined its position “as urging its member institutions to avoid a policy of granting credit to men and women in the armed forces to return to school or college without regard to their actual educational achievement as demonstrated by examination or other similar evidence” (as quoted in Moore, 1985, p. 56).

As one might imagine, lecture and discussion topics throughout the early decade were prevalently focused on the impact of the war on educational institutions, as well as the education of returning veterans. In 1945, the American Council on Education requested that the Association discern how state departments of education were certifying institutions focused on veteran education (p. 59).

Despite the constant call to set policy for member institutions, or assign qualitative ratings to secondary schools and colleges in the region, the New England Association of Colleges and Secondary Schools consistently deferred inquiries, referencing the membership roster and the standards governing the member institutions. Such pressures compelled the Executive Committee to reiterate that secondary schools may reference their membership in the Association, and to state that they were accredited by the Association was incorrect (p. 61). Similarly, a request by the American Council on Education to provide ratings for New England public high schools was denied, instead providing the secondary school standards and the membership list as the only assistance (p. 62). However, the Association was clearly split on the issue of certifying or accrediting member institutions, as a 1947 secondary school membership survey indicates.
As the 1940’s concluded, “the approaching monster of accreditation loomed ever more portentously on the horizon” (p. 65). The Association of American Colleges ceased publication of approved membership; the American Council on Education continued to consider a procedure of accreditation; and the United States Office of Education exerted pressure on the regionals to assume responsibility of approving institutions.

Association meetings frequently returned to the prospect of reevaluating current membership according to standards established for secondary schools and colleges, as well as using these standards for admission of new members. By 1950, a Committee on Evaluation was established, which consulted with both the Middle States and North Central associations on adoption of evaluation procedures. At December 1952’s annual meeting, the association resolved to empower the three standing committees (higher education, private secondary schools, and public secondary schools) with “jurisdiction over the formulation, maintenance, and enforcement of standards of admission and continued membership of its group within the association” (as quoted in Blauch, 1959, p. 48; Holland, 1985, p. 69). While this charge set precedent for the institutional members seeking Association admission, the process to review current membership, led by the Committee to Study Reevaluation, still endured continuous discussion, characterized as a “heated debate” in the October 1952 meeting proceedings.

However, by the close of 1953, the Association embarked on the reevaluation of current members, in addition to the evaluation of new institutions. With subcommittees on evaluation having been formed by the three standing committees, a series of “grass roots,” or state regional meetings to communicate a plan for reevaluation and address detractors of institutional evaluation (Moore, 1985, p. 73). During 1954, seven colleges underwent reevaluation, six of which were voted for continued membership (p. 74).
Accrediting Accreditation

The Association’s assumption of evaluative function surely impacted New England institutions which sought NEASC membership after the 1952 resolution; prospective members endured a full review according to the standards of the standing committees, while existing members were grandfathered and underwent periodic review (Brittingham, 2007, p. 7; p. 14). As processes and criteria were fine-tuned over the next two decades, the institutional reviews by the respective commissions took on more significance for the member institutions, both new and old.

The work of other organizations, coupled with pivotal cultural events, influenced the shaping of the regional accreditation role in United States higher education. The establishment of the National Commission on Accrediting (NCA) in 1948 was instrumental in empowering the regional associations, as it sought to standardize the practice while preempting the increasingly crowded field of accrediting organizations (Harcleroad, 1980, p. 25). From the outset, the NCA clearly “sought most seriously a solution that would delegate all accrediting to the regionals, and pare professional accrediting down to a few agencies that, with NCA approval, would either serve the regionals in an advisory capacity or work under their direction” (Orlans, 1975, p. 19). While the NCA eventually acknowledged, in addition to the regional bodies, the need for autonomous professional accrediting bodies in areas such as medicine and law, it ultimately succeeded in compelling organizations such as the AAU and AAUW to defer the function to the regional associations.

The efforts of the NCA influenced the New England Association’s decision to take on the accrediting function, as Dean Porter, the New England delegate to the NCA, reported that “the National commission had already advised seven special accrediting agencies to stop accrediting
institutions and work through the regional associations” (Holland, 1985, p. 70), which limited the Association’s options.

Meanwhile, the National Commission of Regional Accrediting Agencies (later the Federation of Regional Accrediting Commissions of Higher Education or FRACHE) was established in 1949 with the express purpose of establishing uniformity of practice among the regional bodies. While the Commission facilitated communication among the associations, it had little success in standardizing practice among the regions (Orlans, 1975, p. 24). FRACHE was unable to step the rise of professional and vocational accrediting agencies, but did galvanize the regional agencies’ charge in review of its member institutions (Alstete, 2007, p. 19). Against the backdrop of the NCA and FRACHE (eventually COPA after their 1975 merger), NEASC assumed the function of institutional accreditation and review in the 1950’s.

Numerous 20th century cultural factors impacted the development of accreditation, mainly out of necessity. The Federal Board of Vocational Education’s gross mismanagement of federal funds through the Vocational Rehabilitation Act of 1918 (Gelber, 2005) precipitated uneven training of World War I veterans, but illustrated an important lesson in the government’s role in the readjustment of returning service people. Conversely, the Veterans Servicemen’s Readjustment Act of 1944 resulted in an influx of returning World War II veterans into college classrooms. An initial 1945 estimate approximated 660,000 servicemen utilizing the G.I. Bill’s higher education tuition benefits (Clark, 1998); by 1949, nearly 2.5 million Americans were in college, exceeding any pre-war year by 1 million (Loss, 2005). This swell in college enrollment resulted in a cultural shift regarding higher education. College attendance became a viable option for the American populace. However, the popularization of college aspirations also led to the emergence of fly-by-night diploma mills, intent on reaping the benefits of federal funding.
Pursuant to Public Law 550, the Veterans Readjustment Assistance Act of 1952 (popularly known as the Korean War G.I. Bill), accreditation agencies recognized by the Commissioner of Education were empowered as the authority on quality of higher education degree and training programs (Bloland, 2001). The Commissioner was directed “to publish a list of nationally recognized accrediting agencies and associations which he determined to be reliable authority as to the quality of training offered by an educational institution” (Finkin, 1994).

The Korean War G.I. Bill had several implications in determining the role and function of accrediting agencies. Most evident was the formal allocation of accreditation agency recognition to the National Council on Accrediting. With the state and federal authorities working in concert with the NCA approved accrediting agency, the federal Commissioner avoided the responsibility for determination of educational quality, essentially assigning this burden to the local agency (Harcleroad, 1980, p. 26). The newly realized infrastructure created a dynamic which continues to persist today, among the Department of Education, the NCA (now Council on Higher Education Accreditation), regional and professional accreditation bodies, and member institutions.

Coupled with the National Defense Education Act in 1958, which tied federal college loans and fellowships to accreditation (Gaston, 2014), accreditation’s role as federal gatekeeper was cemented in U.S. higher education.

In a sense, the linkage between eligibility for federal funds and membership in an approved accreditation agency empowered, legitimized, and increased the visibility of accrediting agencies (Orlans, 1975). Specialized, professional, regional and proprietary accreditation bodies became essential agencies in the higher education community, necessarily conforming to standards and procedures set forth by the National Council on Accrediting, indirectly accountable to the federal
education authority, while attempting to maintain assurance of quality measures among their member institutions.

This dynamic was solidified through the Higher Education Act of 1965, which further expanded the roles and responsibilities of each entity in this complex partnership. The HEA extended far beyond simply formalizing the relationship between the accreditation bodies and the federal government; the act extended the variety of means by which students could access federal support of post-secondary education. While post-secondary enrollment continued to climb since the post-World War II GI Bill era, federal funding continued to expand in the late 1960’s through introduction of the TRIO programs and other initiatives geared toward overcoming financial barriers to access (Gaston, 2014, p. 52).

By using the existing accreditation structure as the qualifier for federal aid, institutions were presented with a challenge in gaining access. Traditional collegiate institutions already had histories with the regional and professional accreditation agencies. However, community colleges, technical schools and thousands of proprietary career schools also sought recognition by accreditation in order to gain access to student federal funding (Finkin, 1994, p. 98).

The renewed interest in accreditation predictably precipitated a ground swell of institutions seeking accreditation, and in turn, accrediting agencies seeking recognition by the federal government for access to federal funding. In response, the Bureau of Education established the Accreditation and Institutional Eligibility Staff (AIES), which was charged with devising a common framework for accrediting body recognition. Leveraging figures from both the NCA and FRACHE, the AIES sought to broaden accreditation considerations to the vocational realm, which had largely been neglected by the regionals (Bloland, 2001; Finkin, 1994; Orlans, 1975).
Through subsequent iterations of the Higher Education Act in the decades to follow, the
dynamic among the federal government, private accreditation agencies, and state regulators
continued to evolve, with shifting roles largely reliant on the political and cultural climate. One
of the more momentous shifts in roles occurred during the 1992 reauthorization of the HEA, in
which Congress sought the establishment of State Postsecondary Review Entities (SPREs),
seeking a greater measure of accountability in reaction to increasing student loan default rates
(Bloland, 1999; Brittingham, 2009, p. 22).

In anticipation of the 1992 reauthorization of the Higher Education Act, the Senate Permanent
Subcommittee on Investigations conducted a series of hearings precipitated by what was
perceived as abuses of the federal student loan programs. The subcommittee’s subsequent report
categorized the federal aid programs as “riddled with fraud, waste and abuse, and is plagued
with substantial mismanagement and incompetence” (Hartle, 2012).

Seen by many as a de-emphasis of the accreditation agencies in lieu of greater federal and
state oversight of higher education, the 1992 legislation was greatly disruptive to the joint nature
of the accreditation enterprise between the federal government and the accrediting associations, as
it was conducted for fifty years. The Council on Postsecondary Education (formed by the
FRACHE and NCA Merger) was perceived as weakened, and eventually dissolved in 1993. With
the Commission on Recognition of Postsecondary Accreditation (CORPA) temporarily taking on
the work on accreditation agency recognition, as well as the National Policy Board (NPB) and the
Presidents Work Group (PWG) meeting to create a new national accrediting agency, the Council
on Higher Education Accreditation (CHEA) was established in 1996 to undertake the task of
The Era of Accountability

CHEA’s recognition in 1996 as the accreditor of accreditors led to mission realignment around the three-fold charge of advocacy, service and recognition. Since its inception, President Judith Eaton has both advocated for the continued self-regulation of member institutions through regional and professional accreditation bodies, while resisting pressure for accreditation bodies to become prescriptive and uniform in its review and subsequent accreditation of institutions.

Instead, the role of the triad is emphasized, in that the state higher education executive offices (SHEEO), United States Department of Education, and the accreditor each have a responsibility in oversight of institutions of higher education. The balance among the entities is characterized as ambiguous to tenuous, in the extent of oversight that is necessary and appropriate, to the manner in which oversight takes place.

In light of its role among the three entities, accreditation has historically relied on a culture of self-regulation on ensure institutional quality among its membership. Initial accreditation, and subsequent renewal of accreditation through periodic review, takes place through participation of colleagues from peer institutions that are particularly qualified to perform standard reviews due to individual expertise. In this manner, a team of reviewers are deployed for the decennial review process, having read the institution’s self-study and supplemental materials; discussed with the team areas which warrant further review; visit the institution to speak to representatives of the community; and report on their findings to the commission.

This process has changed little since initially envisioned early in the 20th century, impervious to the reorganization and rebranding of accrediting bodies. Despite periodic calls for review by an external entity rather than peers from member institutions, the general process has persisted for nearly a century among regional and professional accreditation agencies.
With the presence of over 7,000 Title IV eligible post-secondary institutions in the US alone (NCES, 2012), CHEA and the USDE recognize and authorize the work of both the six regional accreditation agencies as well as sixty professional accreditation agencies. To better define the relationship between CHEA and the federal government, Dickeson suggests establishment of a Congressional Charter, as other non-profits organizations have done, to signal the federal governments sanction of the accreditation work that CHEA oversees (Greenberg, 2011).

Secondly, the matter of the regional agency efficacy is brought into question at times. Given the historical evolution of the regional associations, oversight is maintained by geographical boundaries, which has resulted in the emerging of multiple commissions within each association. Furthermore, each regional higher education commission includes institutions delivering a wide range of training and credentials. While New England distinguishes among public, private, and international K-12 schools in addition to a higher education commission, the Western Association delineates between community/junior colleges and senior colleges & universities through separate commissions.

Yet, the higher education commissions are still charged with overseeing a wide range of institutions, delivering very different credentials. Due to this, Greenberg (2011) proposes reorganizing the accreditation structure by means of the Carnegie Classification of Institutions of Higher Education, thereby strengthening the structure through purposeful, focused commissions that can better serve its member institutions. From the vantage point of accountability, a better nuanced construct may better deliver prescriptive standards, expectations and institutional outcomes, standardizing the institutional review process in a manner that better fits each sector.
However, a restructuring of accrediting agency assumes that the current construct doesn’t work, and more prescriptive oversight, as opposed to autonomy of each institution to define mission and objectives, is desirable.


As demonstrated, regulation of higher education in the United States has consistently provided the platform for debate, as no definitive conclusion has arrived related to the locus of control among the stakeholders: federal government, state government, and regional accreditation bodies. Subsequently, the call for reform, restructuring and greater oversight remains a continuing concern.

U.S. Secretary of Education Margaret Spellings’ appointment of the Committee on the Future of Higher Education was timely, given that the total amount of undergraduate federal student aid doubled in a decade (1994-2004), compounded by 50% increase in average tuition rates over the same length of time (Baum, Elliott, & Ma, 2014). The commission’s charge, to develop “a comprehensive national strategy for postsecondary education that will meet the need of America’s diverse population and also address the economic and workforce needs of the country’s future” (Gaston, 2014), was implemented through six commission meetings; two public hearings; and an accreditation roundtable from October 2005 to August 2006 (United States Department of Education, 2006b).

Commission member Robert Zemsky (UPenn) recounts the charge of the Commission Chair, investor and University of Texas Board of Regents Chair Charles Miller to conduct a “good civic discourse,” while essentially over the course of the year, “hold[ing] higher education’s center stage, cajoling, criticizing and provoking” (Zemsky, 2007). Zemsky furthermore suggests that Miller, along with Ben Wildavsky (formerly of US News, presently at SUNY) secured a team of
consultants to privately draft an initial set of summary findings, which was eventually distributed at a June 2006 Commission meeting. Among the assertions found in the early draft: “Among the vast and varied institutions that make up U.S. higher education, we have found equal parts meritocracy and mediocrity” (United States Department of Education, 2006a; Zemsky, 2007).

Ultimately, the edited and sanitized final report, entitled “A Test of Leadership: Charting the Future of U.S. Higher Education” does provide pointed criticism of the accreditation agencies, including the lack of “solid evidence, comparable across institutions, of how much students learn in colleges of whether they learn more at one college than another” (p. 13). Suffice to say that this criticism continues to reemerge among critics of higher education accreditation. On the point of focused change in accreditation, the report asserts that Accreditation reviews are typically kept private, and those that are made public still focus on process reviews more than bottom-line results for learning or costs. The growing public demand for increased accountability, quality and transparency couples with the changing structure and globalization of higher education requires a transformation of accreditation (p. 14).

While the Commission findings focus on lack of comparable quality metrics for the public, the report also criticizes the timeliness with which new institutions and programs may be approved, thus stemming innovation in higher education at the expense of cost and efficiency. Subsequently, the Commission asserts that the accreditation agencies “act in a more timely manner […] focusing on results and quality rather than dictating, for example, process, inputs, and governance, which perpetuates current models and impedes innovation” (p. 20).

Ultimately, the call for accountability and transparency, while at the same time, expedience and innovation, are at the heart of the Spellings Commission recommendations for accreditation.
agencies. Despite the relatively temperate and civil tone of the final draft, David Ward, then-President of the American Council on Education and Commission member, would not endorse the published report. Bell stated that multiple factors attributed to the issues raised by the report, and that the report also failed to acknowledge “the diversity of missions within higher education and the need to be cautious about policies and standards based on the one-size-fits-all approach” (Carey, 2007).

In her September 2006 comments at the National Press Club, Secretary Spellings announced her plans to “address the issues of accessibility, affordability and accountability raised by the commission” ("Spellings: Commission Is the Beginning of 'Long Overdue Reform'," 2006). However, Spellings’ efforts to implement changes based on the Commission’s recommendations were largely thwarted by both higher education institutions and Congress, given the far-reaching nature of the changes (Hartle, 2012).

Despite Spellings’ efforts to encourage dialogue in the rule-making sessions that followed the release of the report, the Commission’s recommendations failed to gain substantive bipartisan support or subsequent legislation reflective of their findings. Senator Lamar Alexander characterized Spellings’ department as attempting to prescribe “how colleges […] should accredit themselves” and asserted that the department was “proposing to restrict autonomy, choice and competition” (Gaston, 2014).

However, Zemsky claims that an adverse impact was realized due to the Spellings’ Commission. Citing a change in regional accreditation, Zemsky asserts that the agencies “have stiffened, making their rules and procedures more formulaic, their dealings with institutions they are responsible for accrediting more formal and by-the-book, and the documentation of each of the steps they had taken to comply with the department’s new standards and criteria more precise
and detailed” (Zemsky, 2011). In this way, the accreditation bodies may have heeded the Commission’s accountability recommendations at the cost of expedience and innovation.

**National Advisory Committee on Institutional Quality and Integrity (NACIQI)**

Due to Title IV funds authorized by the 1965 Higher Education Act (HEA), accrediting organizations undergo a federal recognition process, under which the National Advisory Committee on Institutional Quality and Integrity (NACIQI) makes recommendations to the United States Secretary of Education. NACIQI serves as a replacement to the National Advisory Committee on Accreditation and Institutional Eligibility (NACAIE), which was established by result of the initial Higher Education Act (Woolston, 2012). While not government employees, this eighteen-member committee is comprised of appointments by the Secretary of Education, U.S. House of Representatives, and the U.S. Senate (Council for Higher Education Accreditation, 2001).

NACIQI was established through the 1992 reauthorization of the HEA, expressly to evaluate accreditation agencies every five years, making recommendations to the Secretary of Education. Upon initial establishment, all committee appointments were made by the Secretary alone, which gave some semblance of control over the factors by which accreditation bodies were evaluated (Brittingham, 2009). While a federalization of the accreditation process was a topic of extended debate in Congress prior to the 1992 reauthorization, discussions eventually concluded with the articulation of ten areas that accreditors must evaluate. NACIQI was established to discern the effectiveness with which each body discharges these duties (Hartle, 2012).

The composition of the Committee changed during the 2008 HEA reauthorization, partly in response to the reform efforts of Secretary Spellings and the Committee on the Future of Higher
Education. Ultimately, Spellings was compelled to withdraw her proposals from consideration given the response of Congress (Hartle, 2012).

Furthermore, Congress restructured NACIQI to distribute committee appointments among the USDE, Senate and the House (using bipartisan appointments), and the Secretary is not allowed to prescribe the way in which accreditors evaluate institutions. Secretary Spellings nuanced her message by the December 2007 meeting of NACIQI, stating that institutions would not be required by any specific measures to account for student learning. Through these changes, Congress both reaffirmed faith in the work of the accrediting bodies, while deemphasizing the USDE influence over accreditation, reserving greater influence for Congress to impact the process (Bardo, 2009; Brittingham, 2009; Cothrum, 2009).

NACIQI has continued to assume its role in the evaluation of accreditation bodies every five years, at times leading to contention given the criticism provided to agencies; some in the decision to renew accreditation of particular institutions, and at other times, delivering broader criticism of the accreditor’s process. In the 2007 evaluation of the Western Association of Schools and Colleges (WASC Senior), the NACIQI report questioned the rigor with which the Commission ensured “the quality of an institution’s effectiveness based on the student outcome data it collects” (Cothrum, 2009). In response to the 2012 evaluation of WASC Senior, commission president Ralph Wolff noted that the 29 issues raised by NACIQI pointed to a very technical interpretation of their charge, rather than a broader view of the commission’s effectiveness in light of its history of effectiveness in evaluating member institutions (Gaston, 2014).

Assessing federal government’s role in accreditation, Judith Eaton, President of CHEA observes a shift in control:
In 2011, accreditation’s historical role in assuring academic quality, as well as a certain deference accorded by government for the judgment of quality by academics, was giving way to more and more government intervention that directed the activities of accreditation and made independent judgments about quality. Nowhere was this more striking than in the emerging governmental efforts to duplicate or even second guess the judgments of accrediting organizations concerning individual institutions or “co-accreditation” (Eaton, 2012).

This shift may become more pronounced with the upcoming reauthorization of the Higher Education Act, for which the Secretary of Education has charged NACIQI to provide recommendations concerning accreditation (Sibolski, 2012).

The April 2012 NACIQI report, *Higher Education Act reauthorization: Accreditation policy recommendations* cites the “confusion and incomplete overlap about compliance with regulation versus accreditation via peer review” (p. 1) as a central issue in the current construct. While recommending that accreditation remain in the institutional eligibility process, the report arrives at several recommendations by which the roles and responsibilities of each member for the triad (federal, state, and accreditors) be made more clear, as well as citing ways in which the accreditation process needs improvement. The twenty-four recommendations consider the roles of the triad; the scope of accreditors; the use of data in quality assurance as well as public transparency and consumer information; and the role of NACIQI as an advisory body.

Eaton (2012) cites concerns with NACIQI’s recommendations, as they seek the federalization of accreditation standards and processes, as well as institutional fiscal performance guidelines (p. 13). Similarly, the report calls for a common set of data collection for use by state, regional and federal bodies (completion rates, job placement, and career progress), thus mitigating the energy
and cost associated with independent collection (NACIQI, 2012, pp. 6-7). In the spirit of transparency, NACIQI calls for public access to institutional accreditation reports, while maintaining the integrity of the accreditation process (p. 8).

In addition to the federalization of these processes, NACIQI suggests the reorganization of accreditation bodies around institutional mission or sector, rather than geography (Woolston, 2012). Citing that “regional commissions have accredited under one tent, research universities, state colleges, liberal arts institutions, community college and special purpose institutions” (NACIQI, 2012), the Committee suggests that a dialogue must take place which fully accounts for the diversity of institutions, leading to accreditation processes better aligned with institutional mission and purpose.

Anne Neal, President of the American Council of Trustees and Alumni, and Arthur Rothkopf, President Emeritus of Lafayette College, submitted the alternate report which calls for the wholesale separation of the accreditation process from federal student aid eligibility, stating, “far from being the general ‘admirable’ system of quality assurance outlined in the final report, accreditation is a broken system” (p. 11). Citing studies attesting to abysmal educational outcomes, the authors claim a conflict of interest between gatekeeper and “self improvement experts.” Therefore, Neal and Rothkopf suggest the institution of common indicators, elimination of federal accreditation, and supervision of eligibility under the Department of Education (p. 15).

On January 2, 2015, NACIQI released a draft of an additional report, Recommendations to inform accreditation and recognition policy and practice. In the addendum to the 2012 report, the Committee advocates for a simplification of the accreditation process through a common set of procedures and timelines, eliminating redundancy and overlap (NACIQI, 2015).
The draft also calls for a revamping of the NACIQI review process of accrediting agencies, focusing on the way in which the body ensures “the health and well-being and the quality of institutions of higher education and their affordability, rather than on technical compliance with the criteria of recognition” (p. 2), as well as a focus on student learning outcomes, which is reminiscent of Ralph Wolff’s criticism of NACIQI.

In addition, the draft restates the need for realignment of accreditation agencies around institutional mission and purpose, as well as the need for public transparency by making accreditation reports available to the public.

The final set of recommendations focus on the role and function of NACIQI as an advisory body, stating that the USDE should “reconstitute NACIQI as a committee with terminal decision making authority […] on accrediting agency recognition” (p. 4), and that all appeals of decisions should undergo review by NACIQI as well.

**Deregulation of Higher Education Accreditation**

With the 2013 Reauthorization of the Higher Education Act still pending, many aspects of accreditation of higher education and the way in which it may change are still undetermined. While a federalization of accreditation, or separation of regional accreditation from federal institutional eligibility is highly unlikely (Sibolski, 2012), the dialogue continues around issues of college affordability, institutional accountability, and simplification of processes relates to Title IV funding, all of which are related to higher education accreditation.

The 2015 report of the Task Force on Federal Regulation of Higher Education, *Recalibrating regulation of colleges and universities*, asserts that “[c]ongress should reestablish proper boundaries for the Departmental [USDE] oversight of institutional accrediting agencies and limit its interference in activities that fall outside the authentic purposes of accreditation” (USDE,
Citing the role of NACIQI in reviewing accrediting bodies, making recommendations to the Secretary of Education, and the “micromanagement” of the advisory body, the Task Force recommends the establishment of clear boundaries to avoid interference by the USDE (p. 23). In addition, the report suggests the uncoupling of regulatory minutiae from the institutional review process (such as Title IV compliance), in order to focus on academic quality.

Finally, the Task Force suggests implementation of “differentiated reviews,” which allow “accreditors to have the legal authority to allow institutions that have records or exceptional quality and performance to undergo a less arduous set of procedures and processes,” which “would enable accredits to focus on those institutions that need additional assistance and minimize the burden on high-performing institutions” (p. 23).

Similarly, US Representative Foxx (R) has put forth the “Supporting Academic Freedom through Regulatory Relief Act”, seeking to “prohibit the Secretary of Education from engaging in regulatory overreach with regard to institutional eligibility,” thereby repealing State Authorization, Credit Hour, and Gainful Employment regulations as well as thwarting the college-ratings plan ("Supporting Academic Freedom through Regulatory Relief Act," 2015). Currently, regional accreditation bodies are advised to monitor these factors on behalf of the USDE.

Summary

The regional higher education association was neither founded nor designed to assume regulatory authority on behalf of the Department of Education, which its roots as a 19th century periodic meeting of secondary headmasters and higher education presidents illustrates. However, the regional accreditor is the most appropriate entity to discern academic quality among its membership.
As Barbara Brittingham (2009) establishes in *Accreditation in the United States: How did we get to where we are?*, accreditation evolved due to the necessity of cultural circumstances, as opposed to design. From nine chartered colleges in the late 18th century to nine hundred institutions in the late 19th century, and seven thousand today; the exponential growth in the higher education landscape, compounded by the exponential growth in federal aid, demands oversight and regulation.

In parallel to the evolution of regional accreditation, the roles of the state and federal government which round out the triad, continue to depend on a delicate balance which respects the autonomy and academic freedom of institutions, while holding recipients of state and federal aid accountable. This balance relies on a middle ground between prescriptive, governmental micromanagement and an environment where profiteering of federal aid is rife.

Affordability, accountability, and quality in higher education have created a broad cultural dialogue in which everyone has a vested interest. Clearly, the relationship between the national stake through federal aid warrants assurances of quality programming and return on investment.

However, regional higher education agencies maintain an unnatural duality as collegial associations of peer institutions and regulators. The peer-review system, while effective, has the difficult charge of providing consultation and oversight simultaneously.

The frequency of Higher Education Act reauthorization will continue to allow tailoring, revision and refinement of accreditation’s relationship with both state and federal government. It is a process of continual refinement, which is reflective of the higher education landscape, and the demands, challenges and opportunities that will continually emerge.
Chapter Three: Research Design

This investigation of the accreditation process was guided by one question that allowed for a comprehensive study of the changing role of accreditation in higher education. This question characterizes the way in which accreditation inspires change in higher education and project the future of the accountability movement in education.

*In what way does the cultural shift in accrediting bodies result in a subsequent shift in colleges and universities?*

A key component of this study involves the last two decennial self-studies of a small New England college and the manner in which the self-study narrative has shifted from an anecdotal document to an examination supported by data, assessment, and outcome-based matrices. Ultimately, this exploration of the accreditation process brings to light several considerations for the successful accreditation self-study.

In conducting a study of regional accreditation’s impact on institutional change, the focus falls primarily on the Commission on Institutions of Higher Education (CIHE), which is a subset of the New England Association of Schools and Colleges (NEASC). While the first regional association established in the United States, NEASC was the last to officially assume the charge of institutional accreditation.

Similarly, this case study examines one member institution and the relation of the Commission to the changes brought about in the institution during the last decade. This small, private, Catholic, liberal arts institution was established in the late nineteenth century, and its decennial reports from the 1999 and 2009 reaccreditations, as well as the 2004 and 2014 five-year reports, chronicle the changes that the college has undertaken throughout the last decade. In addition, interviews with the immediate past and current president, the vice-president of academic
affairs, the institutional review self-study chairs, and a CIHE staff person shed light on the impetus for change that the institution has realized over the last decade.

Both the research question and the theoretical framework adopted for this inquiry enabled the utilization of a qualitative approach by means of a case study. The examination of the archival materials, decennial review documentation, Commission correspondence and interim updates; as well as interviews of the self-study chairs and President who oversaw the institutional review, provide a rich context for an analysis of the institutional strategy and its implementation.

**Qualitative Research Approach**

The study utilizes the case study approach to qualitative research, and the perspective of the participants prove key to a comprehensive understanding of the changes that the College has undergone. As Ponterotto (2005) states, “reality is constructed by the actor (e.g. research participant),” and the perspectives of the key stakeholders on institutional changes and real, or perceived, influence of the self-study process proves enlightening to a broader study of the regional accreditation body’s role in member institutions.

Maxwell (2005) cites five intellectual goals which qualitative studies seek to fulfill, which include, understanding meaning for participants; understanding “context within which the participants act”; identifying unanticipated phenomena and influences; understanding the “process by which events and actions take place”; and “developing causal explanations” (pp. 22-23).

Maxwell’s five intellectual goals prove particularly pertinent to this study. Through interviewing institutional participants in the accreditation process, the researcher established how participants make meaning of the accreditation process relative to the home institution, and the way in which accreditation influences the way in which the institutional leadership engages in decision making and brokers subsequent change in all aspects of the institution.
Clearly, causation is a key determinant relative to institutional changes. Throughout this study, the researcher explored to what extent the accrediting body influences institutional change; to what extent each of the institutional stakeholders (trustees, administration, faculty, students) independently or collaboratively enact change; and in what instance, the institution brokers change jointly with the accrediting body.

In turn, the intellectual goals articulated by Maxwell inform the practical goal undertaken through this qualitative study. This study examines the accreditation process, participants, and various influences, not only to “assess the value” of current practice, but also to “help improve existing practice” (p. 24). Examination of effective change management in relation to the accreditation process at one institution provides guidelines applicable to higher education in general.

A qualitative study cannot represent the experience of every institution, but provides a representative picture of the process under which a typical private denominational liberal arts college reflects upon the state of the institution; assesses the success of the organization relative to the institutional vision and mission; and subsequently charts a course for organizational change in order to sustain its viability. Consideration of stakeholders’ perspectives on both internal and external influences on the decision making process provide a rich commentary on the operation of a traditional institution of higher education in the contemporary landscape.

An exploratory case study is an appropriate lens by which to examine accreditation at one institution. An examination of the archival materials, coupled with the perspective of the institutional participants involved in the process yield a better understanding of the institutional issues emphasized through the self-study, and the subsequent changes undertaken at the College. Through these known variables, this case study considers the influences that led to institutional
change, and how these particular changes emerged. An exploratory case study is beneficial “when the research goal is to describe the incidence or prevalence of a phenomenon or when it is to be predictive about certain outcomes” (Yin, 2003).

This exploratory case study remains anchored in certain assumptions about the nature of regional accreditation and the way in which it has evolved over time, providing some direction and rationale to the study, which Yin describes as common in this approach (p. 22). However, the knowledge of greatest interest emerges from the extent to which this process inspires change in the institution, through both direct and indirect means.

**Participants**

For the purposes of this study, the researcher chose prospective participants based on their roles in the decennial self-study process and ongoing activity relevant to institutional accreditation. This purposive sample includes the current and past president of the institution (the leadership transition occurred in 2013) and the chairs of the 1999 and 2009 decennial self-study; the vice-president of academic affairs; and a CIHE staff person familiar with the institution.

The president of the institution, who provided access to archival materials, reports and institutional correspondence, granted permission for this study.

The college president granted access with the provision that the institution remains unnamed in the study. For the purpose of this study, the institution is referenced as *the College*, and the interviewees are identified by their College titles or roles only. The researcher made a concerted effort to omit any extraneous detail, which may reveal the identity of the institution, and requested that readers of the study highlight any characteristics that may inadvertently identify the institution. The IRB consent form (Appendix A) detailed the intention of respecting the institution’s desire to remain unnamed.
Procedures

This institutional case study utilized college archival materials, including two decennial self-studies (1999 & 2009); five-year progress reports (2004 & 2014); correspondence between the institution and the Commission on Institutions of Higher Education (NEASC), which include visiting team follow-up reports and notifications of substantive change. In reviewing these materials, particular attention was devoted to the significant academic and administrative changes both reported by the institution as well as changes referenced in Commission correspondence.

The researcher also conducted interviews with the past and current presidents of the institution and self-study committee chairs. Once interviewees signaled their willingness to participate in response to the recruitment letter (Appendix B), all interviews occurred on campus in venues of the participants’ choice. The 45-minute session entailed a set of questions prompting the members to detail the significant changes that the institution has undergone in the last fifteen years, and the way in which these changes relate (if at all) to the process of reaccreditation. Did the institutional leadership inspire the academic and organizational changes? In what way did the reflective self-study process impact the change process? Who were the key influencers who inspired and implemented these changes?

Open response questions guided the dialogue of the interview (Appendix C). At the end of each interview, the researcher prompted the interviewees to conclude with any additional insights or observations related to the committee experience.

Data Analysis

After interview transcription and participant confirmation, the researcher chronicled the evolution of identified changes through the archival materials, providing richer context to them through the accounts of the interviewees.
The data analysis for this case study utilized a logic model, which was particularly helpful in mapping the chain of events which, in this case, led to institutional changes relative to the accreditation cycle (Yin, 2003). Through use of the *organizational-level logic model* (pp. 127-133), institutional changes over time were chronicled, taking into account the influence of both the institutional leadership; and the self-study process, coupled with the visiting teams’ reports and articulated areas of focus.

The themes identified in the logic model relate to Kotter’s eight-step change model (1996), but also entail differentiation between institution-driven change and accreditation-driven change. In detailing the change that the institution has undergone over the last decade, participants offered both objective accounts of the conditions under which the changes have taken place, as well as personal reflections on the success and impact of the changes.

The researcher transcribed and analyzed data shortly after the interviews took place; after which, initial themes were applied for data organization. In this way, themes were modified in light of the results of the data analysis.

The researcher recorded and transcribed interviews with Rev, accompanied by written notation of observations and highlights during the interview, using Evernote. The interviewees reviewed all transcripts to insure the accuracy of the transcripts (member checking). Upon completion of this study, both recordings and transcripts will be destroyed.

**Ethical Considerations**

This study presents no potential physical or psychological harm to participants; however, confidentiality for both the interviewees and the institution is a significant ethical challenge in conducting this research. Therefore, as previously stated, the researcher took measures to omit characteristics that may identify the institution and the subjects. While the questions and
subsequent insights are not particularly intrusive, assurance of confidentiality is paramount to ensuring both comfort and candor of the interviewees.

Furthermore, names and defining characteristics were omitted from interview transcripts; access to the recordings and transcripts were limited to the researcher and primary reader; and all digital recordings will be destroyed upon conclusion of this study.

**Trustworthiness**

The efforts to maintain the validity of this study, the researcher used several common techniques utilized in qualitative research. Given the number of participants, *triangulation* (Yin, 2003) proved a key component of interview analysis as several common themes emerged among participants’ commentary. After the interviews were transcribed, the researcher noted the thematic threads evidenced throughout the interviews, thereby corroborating evidence found through the interviews as well as the archival materials (p. 98).

*Researcher reflexivity* (Maxwell, 2005) also played a role, incorporating “the fact that the researcher is part of the world he or she studies” (p. 109). As an alumnus of the institution, the researcher acknowledges that a set of assumptions shaped his perceptions, through an undergraduate tenure on campus.

**Research Bias**

The researcher holds both personal and professional biases in this study of the problem of practice. The researcher is an alumnus of the case study institution, although the personal knowledge of the institution is twenty years outdated. It was necessary to be cognizant of both positive and negative impressions of the institution, and the potential to somewhat cloud the objectivity of this study.
Secondly, as a lifelong Catholic, the researcher is aligned with the principles and mission that the institutional upholds as central to its educational mission. This factor also compromises objectivity, and remained an important consideration in the analysis of the researcher’s findings.

Professionally, the researcher has engaged in regional accreditation for nearly a decade, having chaired two decennial self-studies; assisted in the annual progress reports, new site visits, and five-year progress report of three institutions; and participated as an institutional delegate in the NEASC annual meetings and periodic workshops. This experience has afforded the researcher a comparative perspective in a foundation of New England institutions and their respective relationships and history with the Commission, allowing a baseline understanding of the accrediting body’s influence in its member institutions.

Despite familiarity with the institution under study, this undertaking allowed the researcher better understanding of the relationship between the regional accreditor and a long-established member institution, and the way in which a college rich in history and tradition can implement change in order to ensure the continuance of its mission and purpose.

Limitations

One of the obvious limitations of this case study lies in the researcher’s familiarity with the institutional setting (researcher bias), although efforts were taken to maintain objectivity. Participants were naturally inclined to attribute institutional decision-making and change management to an internal process, as well as than attributing changes to external influencers, such as the regional accreditation agency.

A predominant concern with case study research lies in the capacity for generalization of the research findings, given the use of a single site and small number of participants. As Maxwell (2005) describes, despite the challenges presented by generalizability, this case study provides
valuable insight, which is readily compared to similar studies for the benefit of corroboration with other studies.
Chapter Four: Findings and Analysis

This institutional case study seeks to understand the relationship between the regional accreditation agency and a member institution. Given the association functions as both a consultative body, as well as the gatekeeper for Federal Title IV funding, the decennial review promotes a culture of continual improvement while ensuring baseline compliance to accreditation standards.

An analysis of fifteen years of archival materials (1999-2014) has taken place, including decennial self-study narratives and five-year reports to the Commission on Institutions of Higher Education (CIHE); visiting team reports subsequent to each decennial review; correspondence from the Commission affirming the College continue in accreditation; correspondence from the College President to the Commission; and institutional CIHE annual reports. Furthermore, interviews were conducted of the chairs of the 1999 and 2009 self-study teams; the President and Past-President of the College; the institutional liaison (and College VPAA) to NEASC; and a veteran staff member of the CIHE.

In considering this particular baccalaureate liberal-arts college, the most significant issue encountered over the last fifteen years was the change in the governance structure, which took place in 2009. A major area of concern for the institution was the general organization of the religious order, as well as the College, under the same corporation. In the 2009 Self-Study, the narrative highlights a “challenge emerging from the current governance structure is the lack of a legal firewall separating the [religious order] and the College. Because the two entities are legally owned and governed by a single Corporation, liabilities incurred by either the College or the [religious order] necessarily affect the other” (p. 20).
The institutional self-studies provide a comprehensive lens for the faults of the long-standing governance model, whose structure was fairly common among historically religious institutions of higher education. The College was founded in the late nineteenth century by a Roman Catholic religious order, its members conducting a majority of the administrative and instructional functions, in addition to providing stewardship of the institution. Over the next century, as it evolved into a baccalaureate institution of 2000 students, the religious order’s oversight of the College stayed in place, with its membership comprising the entire Governing Board.

The nine-member Governing Board was comprised of the head of the religious community; three members whom he appointed; four members elected by all permanent members of the religious community; and the Treasurer of the Corporation (ex-officio).

The thirty-five member Board of Trustees served in an advisory capacity, which was composed of members outside the religious community. However, all final decision making authority resided with the Governing Board.

The 1999 Self-Study depicts the issue with this structure, as the governance model for a contemporary higher education institution, succinctly: “Specifically the problems that [current governance model] can create are two-fold: micromanagement and undercutting administrative authority” (p. 19).

The Chair of the 1999 Self-Study describes a problematic governance structure, which ultimately reserved decision-making responsibility to the nine-member Governing Board:

The CFO can lose a vote with his fellow Vice-Presidents down here, get another crack at it as a Trustee, and yet another crack at it as [a member of the order] overseeing the College. The governing body was an elected body at most. The Trustees had no officiary responsibility. They were an advisory board. Good, quality trustees who’d put in a lot of time, who could
help the college financially as benefactors, who were less and less interested in having their
time used when they were being asked to serve on the board for just their opinions. In this
case, they were just advisory (2015).

The governance model of the College had proven noteworthy for several decades at the College,
to which the Self-Studies attest. The Past-President, who initially arrived at the College in 1965
as an undergraduate, recollects the governance structure as characterized as “curious, but it
seemed to be working” (2015) in the 1970’s, when most Catholic institutions began a separation
of religious and institutional interests, incorporating lay people in board positions. By 1990’s, the
governance issue became a central topic in the institutional dialogue, which is reflected in the
1999 narrative.

Following this theme throughout the institutional reports from 1999-2009, the 1999 Self-
Study mentions the potential Canon Law implications of a governance change and the intention to
secure a consultant on the issue; and the 2004 Five-Year Report articulates an ongoing three-
stage, multiyear plan to consider new governance models. The 2009 Self-Study describes the
presentation of seven potential governance models; the 2006 inconclusive vote by the religious
order to amend the bylaws establishing a shared governance model; and a subsequent 2007 public
statement communicating the lack of consensus, subsequently proposing to revisit the issue in
four years’ time.

Themes of the Study

In a review of the materials and research, several themes emerge, which are relevant to
understanding the relationship between the institution and the accrediting agency. The process
depicted in this study lends itself to Kotter’s Change Process, in adherence to three predominant
phases of the process:
Creating Change Culture, and the culture of urgency that is inspired by the review cycle.

Change Engagement, and the interplay between institutional activity and the accreditation agency role in promoting engagement; and

Implementing and Sustaining Change, the manner in which the impending decennial accreditation review is leveraged by institutional influencers to initiate change; and the ongoing accountability that the process encourages, leading to sustainable change.

These elements are evident through the fifteen-year correspondence among the institution, visiting teams, and CIHE. Furthermore, these themes shed light on the dynamic between the accreditation agency and the member institution, the way in which change is inspired at an institution, and the internal and external motivators of change considerations.

Creating Change Culture

The conditions under which a culture of change emerges, involve an underlying current of urgency. Enacting change in a stable, functional culture is only possible through successfully proving that the status quo is insufficient, and the institution may realize optimal results through change; or the culture is at risk due to a shift in environmental conditions. In the latter instance, the culture of urgency takes hold through establishing that the potential risks that external conditions present outweigh the stability of maintaining long-standing, internal practices.

The compilation of an institutional self-study is an intentionally reflective process, through which objective measures governing higher education are considered. In examining the Commission Standards; describing the institution’s adherence to each standard; performing an appraisal of the institution in relation to each area; and providing a set of projections of how the institution may not only maintain but also improve upon its current work, a community-wide
dialogue takes place on both the institutional strengths and weaknesses articulated through the narrative.

Those involved in the self-study process at the College generally view the accreditation process in a positive light. The Past-President, a member of the religious order that founded the institution, served as a Commissioner on the CIHE for a number of years, in addition to serving on several self-study teams. He values the good work of the Commission, and believes the Self-Study process begins a dialogue regarding what is necessary for the future of the institution, which is then reflected by the visiting team.

Articulation of the change necessary for the institution is the basis for establishing the culture of urgency. Movement from governance as a quaint curiosity, to an antiquated structure over the span of a decade, impeding day-to-day operation of the College, denotes an evolving community dialogue on the issue. This movement was largely created by influencers who both advocated for a change, as well as figures who spoke to a stronger need to maintain tradition, religious identity and adherence to institutional mission.

Indications of a growing culture of urgency at the College certainly existed prior to the 1999 institutional Self-Study’s publication, related to governance concerns. The establishment of a Board of Trustees in 1957 signaled the desire for a “more inclusive representation at the governance level” (1999), namely, a Board representative of lay professionals who could inform the direction of the College. As such, the Board of Trustees provided input on “administration, finance, policy review, educational programs, college advancement, and student services” (1999) during two annual general meetings and corresponding committee meetings.
As a follow-up to the College’s 1994 Five-Year Report to the Commission, the CIHE encouraged the College to review and evaluate the governance structure, in order to discern if it met the spirit of broad-based, shared governance.

Over the next few years, the College organized a task force to inform the creation of the College’s *Five-Year Plan*, which responded to five goals or directives, the fifth and final directive intending to, “[r]eview and renew the organizational, committee, planning, evaluation, and decision-making structure of the College in order to ensure collegiality and enhance effective action” (cited in Self Study, 1999).

The Appraisal offered in *Standard Three: Organizational and Governance* of *Self-Study: 1999* states “It is the purpose of this chapter to evaluate the College’s organizational structure, not the performance or behavior of individuals within this structure” (p. 19); and proceeds to offer an assessment and acknowledgement of the governance issue:

During [the College’s] last accreditation visit ten years ago [1989], and again five years ago [1994], the New England Association singles out the Organization and Governance as requiring special examination, and the need for this remains. The present Organization and Governance structure of the College unnecessarily blurs the distinction between the ownership, governance, and administrative functions of the College. It is evident that there is a need for a Governing Board to delineate clearly its role of governance so that the administration of the College is not hampered or even perceived to be impeded in its day-to-day operation.

[…] The need of reexamination of governance made clear in this report is recognized by the Governing Board which has undertaken a three-year examination of governance which focuses on issues laid down in this report. A recent letter to the Self-Study Committee from
the [head of the religious community] and the President reports that they have hired an outside consultant and indicates that it is their goal to resolve the problems […] by] June 2001 (p. 21).

The urgency of enacting a governance change is further underscored in the Projections section which describes the need for expanded roles for all community stakeholders, as well as meaningful consultation before key decisions are made by the Governing Board, as opposed to notification after the fact.

In his reflection on composing the narrative, which stated the issues of governance so definitively, the Chair of the 1999 Self-Study attributes the tone to the Past-President’s formation of the Self-Study Committee, having been composed of faculty members and administrators who had worked at the College for fewer than ten years. The Past-President “wanted an internal NEASC committee to write the self-study that offered a new, fresh set of eyes.”

The Past-President was aware that governance would emerge as the central issue of the 1999 Self-Study, and had prepared the head of the religious order for the need to address the institutional governance, as “NEASC was bringing it up, and bringing it up, and bringing it up…” (Past-President).

A change worth noting prior to the 1999 Self-Study Visit was the appointment of an Interim Executive Vice President (EVP) in August 1998, charged with overseeing all area heads. The EVP, characterized as the leader of the day-to-day operations of the College, was installed as the Chief Operating Officer, a layperson appointed out of the faculty by the Past-President.

The EVP (who was also the 1999 Self-Study Chair) served from 2008-2013, and viewed his appointment as anticipatory of the 2009 NEASC visit. The EVP appointment was not viewed as an ideal process, as none of the community stakeholders (faculty, students or board) were
consulted in the process. “If NEASC could come on campus without even that role filled, the other dysfunctionalities in governance would've been much more apparent, perhaps even glaring” (1999 Self-Study Chair).

Further affirming the EVP’s claim is the community announcement of the interim role, a joint letter by the Past-President and head of the religious order. In conjunction with the appointment of the Interim EVP, it was stated that the religious community would continue to discuss the issue of governance, seemingly linking the two issues (1999 Self-Study Chair).

Yet again, the 1999 narrative notes in its appraisal of governance that:

- A significant level of frustration exists among the faculty concerning their lack of input and involvement in issues broadly related to the life of the College. The Faculty Senate is particularly frustrated with the lack of communication between themselves, the President, the Governing Board, and the Board of Trustees. In response to the Senate’s concerns, it was recently assured a consultative role in a wider range of administrative appointments, including the Executive Vice President. This consultative role will take place before the Governing Board has made its decision.

A culture of urgency emerged on a number of levels concurrent with the preparation of the 1999 Self-Study, as expressed by the Past-President and communicated to the head of the religious community, the faculty, and administration. The College needed to reconsider the locus of decision-making capacity, versus the consultative, advisory role relegated to those outside the religious community.

Even in terms of consultation, the dialogue surrounding governance occurred largely within the religious order membership with little input from the broader community. Both the 1999 and 2009 Self-Study Chairs (lay, tenured faculty) recollect “silos” of dialogue taking place within the
Faculty Senate, campus committees, and Self-Study committees, while the religious order conducted private conversations on the governance issues.

The 1999 Self-Study Chair characterized it as a “family matter” (meaning the religious order). But it was also referenced as a “third rail,” with governance being such a sensitive issue that it rarely acknowledged or addressed publicly. As such, no public forum brought together the various campus stakeholders. This contributed to the uncertainty, apparent indecision on how to proceed, and an increased urgency regarding the need for an amicable resolution.

The CIHE Evaluation Team Report to the College in result of the 1999 visit cited the governance structure as a weakness which has continued from the 1989 report, acknowledging that dialogue and the assistance of an external consultant denotes progress in addressing the issue, but concludes that the weakness “has not been adequately dealt with. […] It is important that the program is now being addressed. It is also important that the College adopt a revised governance structure that is not only more effective but that is equally capable of sustaining the Catholic […] character of the College” (CIHE Evaluation Team, 1999).

The Commission’s correspondence to the College Past-President following the 1999 Self-Study Visiting Team’s report states:

The Commission is certainly aware that a good deal of complexity of [the College’s] governance structure is an almost inevitable result of the close affiliation between the [religious order] and the College […] We also take favorable cognizance of the fact that, in the words of the visiting team’s report “despite the non-traditional arrangements of organization and governance, the mission and purpose are being steadily accomplished”. Nonetheless, it is also the case that our standard on Organization and Governance specifies that “the authority, responsibilities, and relationships among the governing board,
administration, staff and faculty are clearly described […] The board, administration, staff and faculty understand and fulfill their respective roles as set forth in the institution’s official documents” (3.2) The College itself has noted the need for greater clarity in matters of governance, and we understand that a consultant as been engaged to assist the institution with this initiative. Far from wishing to prescribe any sort of specific outcome for the College in this matter, the Commission desires only that the institution define and develop an appropriate governance structure, and that it report on its program in this realm in the 2002 report (Commission, 1999).

With the issue and a timeline clearly articulated, the College committed to addressing the governance issue with the assistance of external consultants. While the Commission does not seek to prescribe a governance plan for the College moving forward, it is invested in the College’s continued progress in resolving the issue. As such, the Commission’s 1999 correspondence required a 2002 progress report, which is often the case for member institutions when there are particular areas of concern. The progress report requirement signals an escalation of urgency, which compelled the College to act. Governance had remained a significant concern, with the introduction of a new structure being the desired outcome. As a result of the 2002 report, the Commission noted that:

With regards to clarification of the institution’s governance structure, a good deal of study and discussion, aided by and outside consultant, has taken place, and, after consultation with the appropriate institutional constituencies, a new model of governance will be proposed sometime during the next year. It is anticipated that this will be in place by early 2004 (Commission, 2002).
The 2004 Fifth-Year Report summarizes a three-stage process that the College underwent in discerning the creation of a new governance model. The process took place from 1998 to 2004, and allowed engagement with the religious order by an external consultant.

The first three years (September 1998 to January 2001) involved a series of forums, interviews and focus groups with the present Governing Board as well as each member of the religious order. “Strong consensus developed that the corporation should be divided. The governance of the [religious] corporation would remain as it is; the governance of the yet-to-be-created college corporation became the object of consideration” (2004). From this process, the consultant presented seven potential governance models.

With the need for change having been established (a culture of urgency), the religious community proceeded to stage two of the process, in which they considered the seven proposed governance models and the “practical application” to the College. Stage three (2002-2004) entailed consultation with canon and civil lawyers; the assistance of the Association of Governing Boards (AGB); and a consultant from the Association of Catholic Colleges and Universities.

In 2003, the religious order’s determination was to form a single Board of Trustees, which would act as “the primary policy making body of the College and [...] replace both the current Governing Board and the current advisory Board of Trustees” (2004), with a majority of the seats reserved for the laity. However, the College would continue under the religious order corporation ownership, who would “reserve some limited powers of governance to itself, including prerogatives that pertain to the fundamental mission and identity of the College and the physical surroundings” (2004).

At the time of the 2004 publication, the Past-President intended to conduct a forum with the faculty, staff and Student Government Association to relate these intentions.
In relating these intentions, the Commission responded that it was “gratified to see the efforts taken to review the governance structure which has clearly been a sensitive and challenging issue” and ultimately signals satisfaction with the College’s solution, recommending no further action until the 2009 Self-Study (Commission, 2004).

The ensuing years brought a new set of challenges, as indicated by the College’s initial resistance to determining a new governance model. The 2009 Self-Study describes a period in which a series of forums were held with various College stakeholders; establishment of a joint religious-lay task force to fine-tune the governance model prior to final approval by the religious order; and the anticipation of communication through the President of progress on the issue.

However, for several years thereafter there was no public movement on this issue. Clearly, the [religious order] was divided on the topic of College Governance. In fact, while not made public at the time, on April 19, 2006, the [religious order] voted down a set of draft bylaws that would have established a shared governance structure for the College. A statement to that effect was issued by the [religious order] in late 2007. The statement further indicated that because the [religious order] was unable to reach consensus on the proposed governance model the [religious order] had decided to put aside any further discussion on the subject matter for a period of at least four years (until 2011).

The Chair of the 1999 Self-Study characterized the communication as, “the most painful and absurd letter I’ve ever seen from this community,” which “was received like a neutron bomb. It sucked the goodwill out of the community from the bottom to the top.”

At the November, 2007 meeting of the Board of Trustees, three resolutions were passed, expressing disagreement and disapproval of the religious order’s decision to table the discussion of governance; requesting that the body’s name be changed from the Board of Trustees to the
Board of Advisors, thus releasing the Board from any fiduciary responsibilities; as well as a commendation the faculty and administration who have sought to see the accreditation process through (Board of Trustees, 2007).

Conclusion

Governance change at the College proved a pervasive issue, particularly since the explicit symptoms of an institutional crisis were not at play. Stable enrollment and finances, as well as committed, a long-serving faculty and administrative corps indicated a stable institution, which had prospered for over a century. But for the increasing consternation of the faculty and the board, the religious order was generally pleased with the organizational structure and its long history of success.

In studying the College’s culture, governance structure, and decision-making process, members of the College community clearly take pride in both the institutional history and the greater context under which it has developed: as part of the Roman Catholic Church’s tradition, as well as the rule of the 1500 year-old religious order which established the College. In fact, the rule of the religious order provided the governance tenets under which the College has operated.

Creating a culture of change requires the presence of urgency to enact change as a response to an institutional structure that is no longer proving effective; or a set of prevailing conditions and circumstances that necessitate change. In the College’s discernment related to governance, the religious order rule, and the hierarchical model, which it prescribes were widely referenced as key to the College’s century-long success.

Central to the religious order rule is the virtue of stability, which the College continues to reflect in its culture and day-to-day operation. From an operational standpoint, the College has not realized the adverse effects of enrollment challenges, demands for new academic programs, or
significant fiscal challenges that plague many private liberal arts colleges. In this respect, no standard institutional performance indicators quantified a need for change, or an underlying urgency, which may have motivated a reconsideration of the governance model.

The absence of a visible crisis directly impacting the College’s operation mitigated any apparent urgency which the proponents of governance change purported. Through the accreditation cycle, the College committed to examining its governance model, in relation to the spirit of representing the public interest. The religious order engaged in this examination, considered the risks involved in shifting emphasis from a structure which serviced the College well for a century (and the religious order for 1500 years). Conversely, the religious order considered the benefits of a new governance model by which a broader representation of interests were represented. In its final consideration, the religious order considered maintaining the long-standing governance model as essential to the identity of the College as well as adherence to the institution’s mission and purpose.

The Governing Board of the College, and the religious order, which it represented, concluded that its decision-making authority met the greater good of the institution and the community that it served. As such, it considered the best interests of all were served in a paternalistic manner.

**Change Engagement**

In order the culture of change to truly take root, the change influencers must firmly establish that change is necessary in response to present or potential risks, precipitated by a shift of conditions in which the institution operates. Only when the hazard is sufficiently articulated, and all stakeholders understand the inevitability of a different course of action in response, can a change engagement take place.
On March 24 2008, the Past-President distributed an update to the College community, messaging a change of tack. On that day, the religious order passed a resolution that stated:

Having listened to the various college constituencies, the Corporation […] has decided to reopen the consideration of governance at [the College] and to pursue a model of shared governance in compliance with NEASC Standards.

What precipitated in the intervening months to have changed the disposition of the religious order? Certainly, faculty and the Board of Trustees broadcasted displeasure at the governance moratorium, utilizing both formal and informal channels.

The 2009 Self-Study’s account of events reiterates the impact of the Board’s three resolutions, compounded by the resignation of both the Chair and Vice-Chair of the Board. Furthermore, “the advisory board had been reluctant to support a new capital campaign,” citing the governance issue as “too problematic to warrant their continued financial support.”

While the issue of governance was an ongoing cause of concern on several levels, the detail that precipitated immediate action involved a 2005 revision of Standard 3.2 of the Standards for Accreditation. Standard Three: Organization & Governance, as it stood from the 2001 revision, previously stipulated:

The governing board is ultimately responsible for the institution’s quality and integrity. It is the legally constituted body that holds the property and assets of the institution in trust. The board has the authority to achieve institutional purposes. Its membership includes representation reflecting the public interest. The board has a clear understanding of the distinctive mission and purposes of the institution and ensure that they are realized. The board sets and reviews institutional policies and assures the institution’s fiscal solvency. It appoints and delegates to the chief executive officer responsibility for the implementation
and management of these policies. Utilizing the institutional governance structures, the board establishes and maintains productive channels of communication among its members and with the institutional community. Its role and functions are effectively carried out through appropriate committees and meetings.

The measure of sufficient “representation reflecting the public interest” was open to some subjective interpretation. Did the College’s utilization of a Board of Trustees, who functioned in an advisory capacity in relation to the Governing Board, provide adequate representation? For that matter, did the religious order members, who comprised the Governing Board, sufficiently reflect the public interest in their decision-making?

The Governing Board certainly understood the mission and purpose of the institution, as well as advised on policy which ensured mission adherence. In essence, the religious order lives the religious mission of the institution.

With the revision of the *Standards of Accreditation*, adopted January 12 2005, the Commission articulated a more prescriptive standard for board composition:

The governing board is the legally constituted body ultimately responsible for the institution’s quality and integrity. The board demonstrates sufficient independence to ensure it can act in the institution’s best interest. The composition of the board includes representation of the public interest and reflects the areas of competence needed to fulfill its responsibilities. More than one-half of the board members, including the chair, are free of any personal or immediate familial financial interest in the institution, including as employee, stock- or share-holder, corporate director, or contractor. Members of the governing board understand, accept, and fulfill their responsibilities as fiduciaries to act honestly and in good
faith in the best interest of the institution toward the achievement of its purposes in a manner free from conflicts of interest.

The phrase “including the chair” was added in the July 1, 2011 revisions. With explicit language in place which stipulated that board interest must be free of personal and financial gains, the religious order was left to discern whether their community, in fact, benefitted from the business of the College.

The VPAA holds the sentiment that the standard change wasn’t necessarily meant to impact religious institutions exclusively, but sought to avoid clear conflicts of interest prevalent in a range of institutions, including proprietary entities. A senior CIHE staff member affirms this impression, stating that, “the Commission has institutions that are sponsored by the State, that are sponsored by for-profit corporations, that are sponsored by religious entities, religious orders, that are sponsored by hospitals, and in one case that is sponsored by a museum. For each of those types of institutions, there’s a need to demonstrate sufficient independence.”

Given the governance structure of the College, The VPAA feels that institution was not in compliance with the new standard. “As religious, and some people would argue that it’s not the case, but under the old system, we had 100% of the [religious order’s] livelihood dependent on the success of the College. We had no independent, autonomous voices on the board, so we needed to address that issue.”

The Past-President shares this sentiment, but fully acknowledges the range of opinions which his brethren possess on the governance issue:

The NEASC Standards said something to the effect that you cannot have a majority of people on the governing board who have some kind of benefit from the institution. The Governing Board was exclusively [members of the religious order]. The College paid their salaries.
Some were arguing, “well, we’re not paid directly; the College is paying the Order.” In fact, it was true, but in fact, we did benefit from it. There was nothing wrong with that; that is how we lived. It was by our work here. The standard had changes and people did not want to admit the change. And there are some people that will go to their graves thinking that they were right that we should have fought NEASC on this. I think NEASC has made it even clearer now in the standards about benefit and the governing board. I say this very frankly, because I think religious institutions operate more like for-profit institutions do, in terms of who the stakeholders are: in the for-profits, you’ve got a corporate board. Here, there’s a religious order.

All College participants in the interview process reference a culminating event, which resulted in a significant impact in the religious community’s decision-making process. At the behest of the Past-President and head of the religious order, two members of the Commission on Institutions of Higher Education staff visited the College in late 2007 for a meeting with the religious order’s membership. College stakeholders cite this meeting as the turning point in the governance discussion.

The 2009 Self-Study Chair recounted, “there were three different meetings. One with the NEASC team, one with the Governing Board, and I think, one with the entire [religious order]. It was very controversial. Many members of the [religious order] felt that [those advocating change were] taking their college away as a result of their interpretation of the standards, whereas [those opposed to the change] were under the opinion, ‘It’s our school, we do a good job, there’s nothing wrong with what we do.’”

The Past-President stated that, “in the build up to this change, had it not been for [the CIHE staff] coming to talk with both the Board and more particularly the […] governing board, and the
[religious community], to explain how NEASC expectations had changed, I’m not sure it would have happened.”

The 1999 Self-Study Chair’s impression of the CIHE meeting adds further color to the dynamics at play.

[The CFO] had led the anti-governance change faction in the [religious order], which was the majority faction. […] He had assured his confreres who trusted him that this would have no impact on accreditation for the College. They believed him. In an effort to shore up that position, he invited a close colleague of his from NEASC to explain to the leadership of the College and the [religious order] why this was going to be okay. I wasn’t part of these meetings. She came in and did just the opposite and explained the ramifications of the position that had been taken.

The VPAA, a member of the religious community, was present for the meeting with the CIHE staff. Put plainly, “their message was that you are not in formal compliance. Some of you might think that you are, but our reading is that you are not and that you need to attend to this. […] That motivated us to move more quickly with the governance structure so that we would have a new structure in place for the next [2009] review, or that we could confirm to NEASC that it would, in fact, be in place.”

While the CIHE senior staff member who co-presented at the College visit did not recollect the specifics of the exchange at the institution, the staffer “would imagine that our points of emphasis were […] there were changes to the Standards that had been recently implemented, and they had been highlighted as areas of concern by the campus community.” As such, the CIHE staff has a straightforward understanding of their charge:
Our role is to advise and inform. The beauty of my job [...] is we don’t make the decisions. The commissioners make the decisions. [...] I can’t remember exactly, but I’m guessing that during our time on the campus, [the Past-President] may have said, “What could happen if we didn’t change our governance structure?” Then, I would have walked through the options available to the Commission. These were - in terms of notice of concern, in terms of putting on probation, in terms of withdrawal of accreditation, in a very matter-of-fact way. We were not saying that this would happen, but simply that these were the options that are available to the Commission when it determines, when it judges that an institution is out of compliance with one or more of the Standards.

The CIHE staff’s reiteration of the Standards, the way in which they changed, and subsequent action if an institution is out of compliance with the Standards clearly activated the College with a new-found urgency prior to the 2009 Self-Study visit.

Throughout 2008-2009, the College moved quickly to the adoption of a new governance model, in comparison to the decade of discussion, dialogue, and false starts that preceded the implementation.

In a statement to the College community dated April 1, 2008, the President of the College informed the wider community that the [religious order] had adopted a resolution to implement a model of shared governance for the College in compliance with NEASC standards by March of 2009. At its June 6, 2008 meeting, the advisory Board of Trustees was presented with a set of draft bylaws with the new model. These draft bylaws approved by the [religious order] in May 2008 are in line with the presentation the President had given to various groups in the winter of 2003-2004, as outlined above. In December 2008, the Trustees unanimously recommended that the [religious order] approve the new bylaws, with
the recent amendments approved by the [religious order] on December 2. Following legal review, the [religious order] approved a new shared governance structure for the College in a definitive corporate and canonical vote on January 27, 2009. The effective implementation date for the new structure is March 31, 2009.

The fact that the College chose to enact the new governance structure midway through the CIHE Evaluation Team’s visit on campus (March 29-April 1, 2009) is worth noting. Did the College schedule the change at the last possible moment or was the date symbolic, with the change as a direct result of the Commission’s standards? “Literally, the team was here and they came under one governance structure, and they left under another governance structure” (2009 Self-Study Chair).

The VPAA agrees that compliance with the CIHE standards “motivated us to more quickly with the governance structure so that we could have a new structure in place for the next review, or that we could confirm to NEASC that is would, in fact, be in place.” He recounts that “it was kind of odd,” as the asset transfer took place at the end of the fiscal year (June 30), “so we had a couple of months where [the books] were out of sync, which was problematic for those two months,” as the structures didn’t match.

The Past-President also noted that the Chair of the Visiting Team viewed the mid-visit governance change as unusual. He acknowledged the change, but stated “it is impossible to evaluate the efficacy of this model until it has been in place for a period of time; conceptually, however, the governance structure aligns the College with the standards of the New England Association of Schools and Colleges” (2009, CIHE Evaluation Team Report).

As such, by the end of FY 2009, the new governance structure for the College was fully in place, as well as the separation of assets, as the religious order gifted the campus property to the
College. While initially untested through the operation of the College, the new Board of Trustees is comprised by no more than thirty-two members, in addition to six seats reserved for members of the Corporation of the College (the twenty-seven members of the religious order) and two ex-officio members (the College Chancellor, who is the head of the religious order; and the President).

In addition, the College and religious order are now separated under two distinct structures, for legal and financial purposes. However, the Corporation of the College (the religious order) still reserves decision-making authority over purchase or modifications to the property (campus); the assumption of debt or bonds; as well as mission-specific changes to the College. For this purpose, a Committee on Reserved Powers has formed to identify specific issues that require Corporation approval (Article IX, College By-Laws).

In the correspondence notifying the College of its continued accreditation, the Chair of the Commission requested that the College give special emphasis to “its success in continuing to access the effectiveness of the new governance system” in its interim (five-year) report (CIHE, 2009).

The 2009 Self-Study Chair characterizes the College’s governance change as a “NEASC inspired, NEASC catalyzed, NEASC brought event […] If NEASC had not been there with the hammer of public probation for governance violations, which was the message [the College was] getting, ‘You have had long enough to get your act together. You are not in compliance with the governance standard.’”

**Conclusion**

The ongoing College debate regarding governance, coupled with the Commission’s continual prompts throughout the accreditation cycle, instilled some urgency in the College community.
However, the 2005 revision of the Governance Standard 3.2, which prescribed that at least half of the board be free of personal interest, made the College’s noncompliance clear. Even still, if ambiguity remained in the standard’s interpretation among religious order members, the 2007 CIHE staff presentation brought clarity to the issue.

In some ways, the subsequent stages necessary to a successful change process were already in place, by the time that the state of urgency evolved into a crisis. The influencers in the guiding coalition (the Past-President, the VPAA, the Board of Trustees and the Self-Study Chairs) had advocated for a governance change during the decade that transpired between self-studies. The change strategy and communication campaign had also taken place years before the change was enacted, with the establishment of a strategic task force and the Past-President’s public forums after the 2004 Five-Year Report. The presentation with the CIHE staff who interpreted the governance standard revision, as well as articulated the potential outcomes available to the Commissioners in finding the College non-compliant, elevated the cultural urgency through emergence of a potential crisis.

Ultimately, the prospect of jeopardizing the College’s accreditation motivated the religious order to act. “The school is their [the religious order] life’s work. It is important to them, and being an accredited school is important to them as well” (2009 Self-Study Chair). For many institutions, the potential of losing Title IV funding is the prevalent factor in adhering to accreditation standards. For the leadership of the College, the prestige and validation that accreditation represents is far more important as a reflection of the College’s good work.

The revision of the Commission’s standards presented a prescriptive indicator to measure the College’s compliance, and its leadership had little choice but to restructure College governance. Although the College may have continued without regional accreditation, this course of action
was never presented as a viable option. From the College leadership’s perspective, the accreditation body mandated the change. The point of contention remains whether it served the greater good of the College in maintaining its mission and identity.

**Implementing and Sustaining Change**

The realization of long-lasting, sustainable change requires the passage of time, and a corresponding series of challenges and satisfactory resolutions by which the newly implanted structures prove successful. The regular operation of the institution naturally produces opportunities to test the governance structure, fine-tune the roles and responsibilities of the decision-making bodies, and subsequently operationalize new procedures enabling broad-based consensus building and results.

The shift in the governance structure for the College may appear subtle to students and others peripherally aware of the College’s operation. In a sense, the mission, operations, and day-to-day of the College have changed very little.

To facilitate the transition, the President of the Association on Catholic Colleges and Universities presented at the inaugural meeting of the newly constituted Board, followed by a Board retreat in June of 2010 (Fifth-Year Interim Report, 2014).

The first tests of the governance structure took place during the intervening years prior to the 2014 Fifth-Year Interim Report. Issues such as selection of a new auditing firm and modification of the faculty rank and tenure process passed through committees for general Board approval. Other decision points, such as the introduction of a new core curriculum, required approval of both the Board and the Corporation as these issues were determined to impact the mission of the College.
The introduction of a new core curriculum yielded the first instance in which the Board, Corporation and faculty were compelled to delineate roles and responsibilities in light of the new structure. As the general education courses were viewed by the college community as having direct correlation with the expression of the mission, the change in both mission statement and core curriculum were an intertwined process, and both required broad approval in the spirit of shared governance.

In the 2009 Self-Study process, the appraisal of the Standard 4: The Academic Program described that “faculty members express frustration with the review process for the Humanities curriculum, particularly in the program’s first year. Because this year is arranged in substantial units, any change is viewed as one which is equally substantial; making some seemingly minor curriculum adjustments seem unworkable” (2009 Self-Study). As such, the narrative describes deficiencies in quantitative reasoning as well as social science representation.

In light of these circumstances, measures were underway to contemporize the core curriculum while addressing areas of content deficiencies. In their report to the College, the CIHE Evaluation team cites the “widespread feeling among both faculty and administration that it may be time to review and/or ‘refresh’ the components of the extensive core” (Evaluation Team, 2009). Under Concerns, the visiting team references the need of a “feedback loop [...] to use data to drive the planning in a more direct way” and “better use external perspectives and objective assessment techniques to strengthen its academic programs,” in addition to measuring student learning outcomes.

Relative to continued accreditation, the Commission responded by emphasizing systematic assessment of student learning, and subsequent modification to the academic program reflective of student results (CIHE, 2009). In recollection of the 2009 Visiting Team meetings, the VPAA
recalls “some very vague language about reexamining the curriculum that we had and what we were planning to do in the next few years” (VPAA, 2015). However, while examining the curriculum was necessary, he characterizes the experience as “traumatic” for the institution, which had the curriculum in place, virtually unchanged, for thirty years.

The College employed a process to overhaul the core curriculum between 2010 and 2014, with a pilot of the modified program in 2013-2014, and full adoption for the Class of 2018. However, the arrival at a new curriculum entailed an active exchange among the faculty, Board of Trustees and the College Corporation (religious order), in which the new governance dynamic was fully tested.

The VPAA frames the curriculum discussion in a far longer timeline than the four years in which the College officially engaged in committee work and approvals. Sourcing back to discussions begun by the Past-President, the community considered ways in which the curriculum should meet contemporary higher education realities, such as an increase in transfer students; a stronger student demand for a greater emphasis on disciplinary study; and need for a broader breadth of content, such as explicit inclusion of the social sciences and quantitative reasoning.

The VPAA ultimately believes “there were winners and losers,” as a reformation of the core, while including additional content, led to a reduction in theology, philosophy, humanities, modern language and English composition. In addition, the College’s signature humanities program was reconceived, allowing for inclusion of contemporary issues and figures. The compromise at which all stakeholders arrived involved a realignment of coursework through a four course, sixteen credit semester (four semester hours per course), which sustained the proportion of the degree, which the core curriculum comprises. In this way, the core curriculum lost no ground (VPAA, 2015).
This multi-year process ultimately resulted in a compromise between those who embraced the underpinnings of the 30-year old curriculum and those who advocated for an update that addressed the academic deficiencies of the long-standing curriculum; all the while providing more contemporary content to the core. As such, a central point of dialogue in this process involved mission, institutional identity, and the aspects that were potentially lost or deemphasized in the change.

The 1999 Chair, who also chaired the curriculum reform task force, describes the Trustees, Past-President, Dean of the College and Executive Vice President as key proponents of the curricular change. From a practical standpoint, the admissions department long stated that the long-standing core curriculum detracted from the academic program from a prospective student’s standpoint.

After first establishing a large faculty task force with equal representation among the academic departments the College, the original committee disbanded after a year-long stand still, and reconfigured for a second year of discussion with a smaller, more synthesized group. The second committee consulted all constituents, including the religious order, Trustees, and administration.

When the task force had reached consensus and made a recommendation to the faculty senate for review and approval, the core curriculum underwent review and approval by the Trustees and the College Corporation. All this was being done under their mission-related authority as prescribed by the new bylaws.

The exchange that transpired between the religious order and the faculty proved to be the first tangible test of the new governance model, as well as the roles and responsibilities defined by the update bylaws. The 2014 Fifth-Year Interim report recounts the timeline for this transaction:
The proposal then went to the College Corporation for review, since it was felt that the new curriculum was integral to the “fundamental mission and identity of the institution”. On September 11, 2012, the College Corporation resolved to approve the draft curriculum with three amendments. These amendments included specific references to the number and type of required Philosophy and Theology courses. Shortly thereafter (October 18, 2012), the College Corporation withdrew that resolution, so as to allow the Faculty Senate, the President and the Chancellor the opportunity to craft a resolution that would be acceptable to all parties. After three months, the Senate passes another version of a revised core curriculum. The College Corporation reviewed this version and determined it to be consistent with the identity and mission of the College.

The 2009 Chair (who also led the task force) adds some additional color to the episode, stating, “The monastic community gave an opinion on a draft of the curriculum that caused a certain kerfuffle in terms of power structures because they said, ‘What you're working on isn't good enough. This is what we'd like’. Ultimately, that recommendation from the [religious order] was rescinded because they felt that they might have overstepped their authority as a governing body to actually make a recommendation to the faculty about a curricular issue, which was very important and timely.”

The 1999 Chair recounts the decision of the religious order as damaging to the morale of the faculty body, especially in light of a long negotiation over the core curriculum. As such, in his role as head of the curriculum reform committee, the 1999 Chair delivered a long letter to Past-President, Board Chair, and the head of the religious committee “rejecting [the religious order’s] rejection.” The letter, in addition to the Trustees’ support for the faculty proposal, likely led to
the retraction of the religious order’s recommendations in order for the faculty to incorporate the recommendations in the curriculum.

While not a perfect process, the 2009 Chair considers the compromise reached for a new core curriculum as emblematic of successful shared governance, made possible by the new governance model.

**Conclusion**

In the years immediately following the 2009 governance change, the new model resulted in smooth operation through several significant yet uncontroversial operational decisions, including the selection of a new auditing firm (providing audits to the newly separated entities, the religious order and the College), as well as passage of new faculty tenure and promotion procedures. In both instances, the College leadership worked jointly with the newly aligned Board of Trustees to engage in swift, efficient decision-making. The initial decisions engaged the new governance structure were edifying for the College, as these decisions provided initial indications that the institution could conduct itself with its long-standing identity intact.

While the new governance structure resulted in a redistribution of authority for the College, it also allowed for a reconceptualization of roles and subsequent empowerment of the Board. In preparation for this new era, the College wisely launched the new Board era with training through ACCU and a board retreat, which allowed for a reconsideration of Board dynamics for members experiencing the transition. A retraining of members and a realignment of Board expectations was essential in light of the new charge, as both empower the body to succeed in the new environment.

Core Curriculum reformation provided the first authentic test of the new governance structure, in that all parties coordinated and reached resolution in accord. In the old model of governance,
the religious order had final and definitive authority over both operational and academic changes at the College. In the new structure, a broader consensus was necessary to make change.

The College Corporation’s initial rejection of the curriculum exhibited elements of historically accepted behavior: the religious order had the right to reject institutional decisions with little explanation or context. However, in rescinding the veto and returning the curriculum matter to the faculty committee with a recommendation, the religious order displayed an acknowledgement and respect for the spirit of broad consensus which the new governance structure represented.

Further indications of an anchored, sustainable change due to the governance shift continue to emerge, as the current President of the College notes. Under the new bylaws, the College appointed its first lay president through a joint search and selection process, in which all stakeholders (the religious order, Board, faculty, administration, and students) participated. The first woman was appointed to the Chair of the Board in recent years as well. In addition, the new structure allowed the Board’s finance committee to shift the College’s investments to further grow the endowment. The change of governance at the College has resulted a series of changes which are significantly changing the operation of the institution through the strategic utilization of its board expertise and new leadership.

**Summary**

Throughout this case study, examining fifteen years of the College’s accreditation self-study cycle, a complete restructuring of institutional governance took place, largely due to the expectations of NEASC, the College’s regional accreditation agency.

The role of the accreditation agency in relation to the change process is at the heart of this study, as the initial research question poses: In what way does the cultural shift in accrediting bodies result in a subsequent shift in colleges and universities? The Commission’s continuance of
accreditation correspondence articulates the agency’s intended role in the change process: “Far from wishing to prescribe any sort of specific outcome for the College in this matter, the Commission desires only that the institution define and develop an appropriate governance structure” (1999).

The accreditation cycle largely drove the dialogue regarding institutional governance, and the continual routine of reporting, team visits, and follow-up correspondence related to the issue cultivated the culture that enabled the change process. As many influencers suggested, the governance conversation spanned four decades, with NEASC as the impetus.

While 1999 marked the self-study year, in which the Commission compelled the College to articulate a plan to address the governance issue, the urgency that followed did not precipitate an immediate change. Given that no amenable resolution presented itself, the religious order called a moratorium to the governance dialogue. For the College, urgency without the crisis of imminent risk did not inspire any meaningful movement toward a governance decision. As is true in all matters, the accrediting body sought to consult, as opposed to prescribe, in institutional matters; while the moratorium did not meet the spirit of the Commission recommendation for the College to reach a decision point, NEASC did not actively intervene.

However, the pivotal event in the College’s escalation of urgency into recognition of a potential crisis involves the Commission’s staff interpretation of the newly-revised Standard 3.2, and discussion of the potential actions that the Commissioners may take if the College remained noncompliant.

The revision of Standard 3.2 from a subjective guideline regarding public interest, to a prescriptive one-half measure free of personal interest, reflects the shift in the accreditation body’s regulatory role. The interview subjects, representative of the institutional leadership and
managers of the self-study, unanimously concur that NEASC both escalated the culture of urgency instrumental in the change process, as well as the abbreviated timeline to enact the governance shift.

After decades of acknowledging the issue and eight years of active dialogue, the College enacted the governance change within a calendar year. The strategy and structure were already in place, as was an implementation timeline. NEASC provided the appropriate immediacy required to proceed. The revision of Standard 3.2 objectively substantiated the non-negotiable terms by which the change needed to take place, thereby neutralizing the opposition at the institution: the mission and purpose of the College could not continue without a shift in the long-standing governance structure. While the historical structure was deep-seated in both the history of the College and the religious order, adherence to accreditation standards prevailed as a timely and immediate concern to ensure the College’s continuance.

Finally, the 2014 Fifth-Year Interim Report, which provides the initial evidence of success under the new governance structure, signals the College’s commitment to sustaining the new structure and subsequent compliance with the Commission’s governance standard. The newly formed Board of Trustees produced early successes with the change of auditing firm and modification of the institutional mission; all parties proved agreeable to these decisions, and the Board appropriate exercised its decision-making authority. In a sense, these early decisions validated the Board’s work, as well as signified the potential for success of the new governing structure.

The reformation of the core curriculum represented an authentic test of the governance structure, as the Board, Governing Body, and faculty coordinated to broker a proposal agreeable
to all involved. Despite an initial reversion to the historically accepted dynamic, the issue was resolved utilizing the new structures in place, again validating the new governance model.

In turn, NEASC’s role, in light of the initial period of new governance, was to affirm the College’s adherence to the standards, and commend the institution on its early successes.

In the operation of the College during the last fifteen years, the accreditation body played a central role in compelling the most significant changes to have taken place in recent decades, both directly and indirectly. In many respects, the dynamic governance structure allows the historically change-resistant institution to prove highly responsive to the 21st century higher education landscape.

In this singular instance of change at the College, the evolving role of the accreditation agency resulted in a necessary shift in the member institution. As the expectations of the accreditors and their scope of Title IV oversight broadens, the member institutions will respond to continue in good standing.
Chapter Five: Discussion and Implications for Practice

This case study sought to explore the dynamic between the accreditation body and a member institution, focusing on a span of time that led to major changes at the institution. The research acknowledges a shift in the accreditation body’s role and responsibilities throughout the last several decades, and the subsequent changes that have taken place at a member institution. Utilizing change theory, specifically John Kotter’s *Eight-Stage Process of Creating Major Change*, provided a worthwhile lens through which to consider the College’s accreditation cycle and the changes inspired therein.

The case study was an effective platform to examine the dynamic between regional accreditation and a member institution, as the perceptions of the college community members, coupled with the accreditation archival documents, provide a rich context for the institutional dynamics at play while these changes took place. While reports to the Commission provide a timeline for action taking place related to college governance, participant interviews shape the broader perspective through positing motivation and intention of the actors; causal explanations; actions and reactions within the community; and both short and long-term effects of the changes on the culture and operation of the College.

An analysis of archival materials and participant interviews yielded three themes of the study, derived from Kotter’s change theory: creating change culture; change engagement; and implementing and sustaining change. These three themes provided a structure appropriate for considering the change of governance at the College, as well as the dynamic between the accreditation agency and the institution.
The first section of this chapter is a discussion of the findings related to the theoretical framework as well as the literature, followed by recommendations for practice, as well as recommendations for future research.

**Kotter’s Theoretical Framework: Relationship to the Findings**

The College’s governance discussion preceded the time period under analysis in this research by decades, by some accounts. The decision to incorporate a lay Board of Trustees in 1958 acknowledged the desire for a broader base of input on institutional decision-making, while keeping the central authoritative entity, the Governing Body, in place.

**Creating Change Culture**

From 1999 to 2007, the College hosted an active dialogue on the potential change for a decade, at NEASC’s insistence. However, the absence of a tangible crisis failed to provoke any meaningful decision for the first eight years of the discernment period. Without an imminent crisis in place, historical practices, which have led to institutional successes, are nearly impossible to dismantle.

The lack of movement on a new governance model is largely due to the success that the College historically enjoyed over a century with the long-standing hierarchical model. The same principles led to the founding order’s 1500-year continuance under religious rule. While some interview participants argued that the change in governance was ultimately for the greater good, there was no set of internal performance factors to compel a structural shift. The College enjoys stable enrollment; the academic programming is highly regarded; and both students and alumni are satisfied with the experience.

Kotter describes this lack of urgency as due to “historical victories - for the firm as a whole, for departments, and for individuals. Past success provides too many resources, reduces our sense
of urgency, and encourages us to turn inward. For individuals, it creates an ego program; for firms, a cultural problem” (1996, p. 41). In light of all the College had accomplished over its first century, there is little impetus to change a system which seemingly works, and to which the institution’s success may be attributed.

Kotter characterizes “the absence of a major and visible crisis” and “too many visible resources” as symptoms of complacency, as well (p. 40). While the institutional Self-Studies acknowledged and articulated governance concerns, and the Commission affirmed these concerns and prompted action through additional follow-up, no ultimatum was delivered if the College were to keep its long-standing governance model in place.

A third source of complacency was due to the very governance model in question. In a “low-candor, low confrontation culture” (p. 40), which this College community epitomizes, no debate took place among the various community groups; the religious order, as well as the Governing Board, engaged in dialogue privately, then communicated their decisions with no forum for feedback. The religious order’s 2006 rejection of new governance bylaws, which was not revealed to the College community until sometime later, provides evidence of a low-candor culture.

The opponents of the governance shift stood by favorable performance indicators as proof positive that a structural change was not only unnecessary, but could also prove detrimental to the identity and religious mission of the College. What assurances remained that lay Board governance, a lay president, and a lay faculty body would successfully adhere to the religious identity and mission of the College, as reflected in the day-to-day decision making of these bodies? Would good business prevail over the institution’s religious foundation?
Kotter depicts these fears as a normal byproduct of the change process, which are allayed through the passage of time and the success of the change campaign as evidenced by day-to-day operation. A series of successes earned through sound decision-making, will ultimately win the trust of the community, and the opposition will at least concede to the change culture, if not wholly embrace the new model (Kotter, 2008).

**Conclusion.** The College is not unique in its resistance to change, given its historical success, which had naturally led to complacency and an overreliance on the status quo. The urgency to change was effectively driven by an external force (the accreditation body), which successfully overcame the complacency, focus on historic victories, and fearfulness related to structural changes. Ultimately, the impending, known risk of jeopardizing accreditation status created real urgency at the College; and overshadowed any potential, unknown risk of adversely impacting the College’s unique religious identity.

This dynamic between the accreditation body and the institution epitomizes the accountability feature of the periodic peer review cycle, and the increasing functional shift in the accreditation agency. While collegial in its initial delivery, the frequent dialogue, the regular requests for progress updates, and eventual insistence on deadlines and deliverables marks the escalation of action, which inevitably leads to Commission action if left unresolved.

The potential of Commission action, even devoid of any explicit mention of the institutional accreditation status, creates sufficient urgency and motivation to expedite the change process in order to ensure compliance with Commission standards. While the change campaign is ultimately driven from within, the internal perception of urgency is shaped by the external body’s continual engagement on the issue at hand. While the Commission continues to oversee the change
engagement, the institution’s good-faith engagement in the process significantly changes the tenor of the conversation, once underway.

**Change Engagement**

During change implementation in any organization, a body of resistance is inevitable, and addressing the fear and skepticism which fuels the opposition is key to both neutralizing and winning their support. Kotter warns against simply ignoring the opposition, but continue to incorporate their views and actively address their concerns as the strategy for change is brokered. The College successfully acknowledged and addressed the religious order’s apprehension regarding mission drift through establishment of a Mission Committee into the new governance structure, which maintained reserved powers of veto regarding mission-related decisions and plans, which impact the property and physical plant. In doing do, the College respected the religious order’s central change of maintaining the religious foundations, as well as provided assurances that the long-time home of the religious order would not be adversely impacted by the growth of the College. This concession in maintaining some reserved powers within the religious order effectively addressed and neutralized the opposition (Kotter, 2008).

From an accreditation perspective, the Commission recommended that the College examine its governance model in light of Standard Three’s emphasis on a board reflective of the public interest. The Commission’s role- to consult, rather than prescribe- was in line with the ongoing prompting for updates from the College on the progress in the conversation. At the time when the Governing Board called for a four-year moratorium on the governance conversation, the members of the religious order had fulfilled the charge of examining the governance model and considering a new structure. In its discernment, they had determined that the long-standing model had worked well, and there was no urgency for immediate modification.
It is noteworthy that during these same years of discernment, Secretary Spelling had assembled the Committee of the Future of Higher Education, seeking to put in place stronger U.S. Department of Education oversight of higher education. The Committee’s report, “A Test of Leadership: Charting the Future of U.S. Higher Education”, calls for “increased accountability, quality and transparency” (USDE, 2006, p. 14). In addition, the Committee called for accreditation bodies to work in a timelier manner, “focusing on results and quality rather than dictating, for example, process, inputs, and governance, which perpetuates current models and impedes innovation” (p. 20). While Spellings’ efforts were ultimately unsuccessful, they signaled the larger debate related to the regional accreditation’s role and its member institutions.

The quality of the educational outcomes was never the source of concern at the College, rather the way in which the institution provided the broader oversight over delivery of its mission and purpose. Standing on its historically good work, the College had no intrinsic motivation to change its structures and practices.

As detailed in the previous chapter, the College was not inspired to move on issues of governance until an imminent crisis emerged; the revision of Standard 3.2 to an objective measure, intended to prevent conflict of interest on the Board, resulted in a clear message that the College was noncompliant. As such, the decade-long impasse between advocates of the governance restructuring and opponents who wished to maintain the hierarchical structure was resolved through the intervention of an external entity.

The series of late 2007 meetings, conducted with two CIHE staff members and various College decision-making bodies, clarified the impact of the “one-half free of personal interest” stipulation in the Standard revision. While the CIHE staff is quick to emphasize that they consult and interpret on behalf of the Commission, the consequences of noncompliance were clear to all
meeting attendees: failure to adopt a new governance structure could potentially jeopardize the College’s good accreditation standing.

John Kotter’s work on change management highlights the utilization of external experts as an effective means to increase urgency and precipitate change. In the face of the complacency facing an inward-facing culture, a sense of urgency to inspire change is often driven by bringing the outside in. “Because of the natural tendency toward internal focus and the complacency that follows, one powerful way to increase urgency is by reducing the gap between what is happening on the outside and what people see and feel on the inside” (2008, p. 64). The CIHE and by extension the decennial evaluation team, provided the necessary urgency through providing an external consultative view. In addition, the Commission’s authority through accreditation provides additional impetus, as the fear of jeopardizing good standing compels the institution to enact necessary change.

This dynamic transpired during the decade between the 1999 and 2009 Self-Studies, as the external focus provoked the College to reconsider the governance model in consideration of a broader basis of consensus and decision-making. Kotter describes such crises as instrumental in creating the necessary urgency to precipitate change. “Visible crises can be enormously helpful in catching people’s attention and pushing up urgency levels” (1996, p. 45). Whether contrived or genuine, crises that threaten the future of an institution inspire change.

The College actions that followed the CIHE consultation, leading to a swift adoption of a new governance structure, reflects the admonition that Robert Zemsky offered in light of the Spellings’ Commission. The agencies “have stiffened, making their rules and procedures more formulaic, their dealings with institutions they are responsible for accrediting more formal and
by-the-book, and the documentation of each of the steps they had taken to comply with the
department’s new standards and criteria more precise and detailed” (Zemsky, 2011).

Accreditation disputes regarding religious-affiliated college governance have precedent, as
illustrated by a 2002 issue between Shorter College (Georgia) and the Southern Association of
Colleges and Schools (SACS). The Georgia Baptist Convention’s (GBC) authority over board
appointment at Shorter College ran afoul of the SACS governance standards related to public
interest, leading Shorter to attempt a separation from the GBC. Despite the risk of losing
accreditation, the state courts in Georgia rules in favor of the GBC, ruling that Shorter had neither
the right to dissolve the GBC’s authority nor change its governance structure (Donahoo and Lee,
2008).

The College’s governance issue resulted in a far less contentious, and internally brokered
resolution. While some members of the College community remain stalwart in the belief that the
longstanding governance structure should have remained in place, the entire community has
abided by the decision, thereby diffusing any escalation of concern by the Commission.

Conclusion. As the interviewees have indicated and the archival materials evidence, the
College has historically exhibited a pattern of long, thoughtful discernment followed by expedient
implementation when a resolution is made. In the case of governance, the College community
engaged in numerous forums of dialogue internally, as well as with the Commission, for nearly
two decades before engaging a new governance model in under a year. In the framework of
Kotter’s eight stages, the guiding coalition, strategic development, and vision (stages 2-4) were in
place long before sufficient urgency emerged (stage 1). Twenty years of creating change culture,
and a year of engaging change culture, led to the ongoing final stage of implementing and
sustaining change.
The hierarchical structure of the institution, which historically inhibited significant cultural change, proved equally advantageous in change engagement. The decision having been made, the course of action and new structure determined, no outward signs of resistance or opposition remained in the College community. Whether resigned to the outcome or enthusiastically engaged in the change, the College stakeholders prepared for the impending changes expediently in anticipation of the visiting team arrival.

The visiting team’s role, as representatives of the Commission, was to affirm that the structure had changed, thereby adhering to accreditation standards. As correspondence with the College indicated a decade prior, the Commission’s role was neither to prescribe a new structure for the institution, nor manage the resultant structure; rather, the accreditation body’s accountability function provided validation of the institutional change.

**Implementing and Sustaining Change**

The College moved from the religious order’s decision to reform the governance structure, to the passage of new bylaws and redefinition of the College bodies with surprising expediency, relative to the years of discernment that preceded the change. Participants in the change process fully attribute the governance change to NEASC’s involvement through the self-study process, as is true with the installation of an Executive Vice President in 2008; the formation of a governance task force; and engagement of external consultants. Several institutional decisions during this period were motivated by the accreditation cycle and the College’s desire to illustrate a conscientious, good faith effort to take the necessary steps in examining the governance structure.

While NEASC did not prescribe these intermediary steps, the accrediting body provided the impetus through the cycle of accountability, and the College’s charge to actively address areas of concern. Even during the 2009 event, when the CIHE staff presented the revised standards and
the options available to the Commissioners in the event of continued non-compliance, NEASC did not explicitly mandate a governance change at the College. However, the College community attributes the crisis that ensued, the expedient resolution, and the subsequent changes undertaken through the new governance model to NEASC’s influence.

Related to this dynamic, potential crises yielded potential opportunities (Kotter, 2008, p. 125) as the College initiated the new governance model. The College contemporized its governance structure to enact a shared power model, incorporating the College Corporation (religious order), Board of Trustees, and the College leadership. In the initial years of this structure, the College has enacted several significant changes, including appointment of a lay president; appointment of a laywoman as chair of the Board; and launch of a revamped core curriculum. Could these changes have taken place under the former governance structure?

Several institutional stakeholders, including the current President, associate the new governance model with both the expediency of the decision-making process, as well as the nature of the decisions taking place. Historically, the president of the institution was selected among the most qualified members of the religious order; as the order’s membership has diminished, selection of a lay president may have proven inevitable. However, the VPAA indicated that he envisions that the succession of the presidency will return to a member of the order.

From a strategic perspective, the short-term wins were instrumental in setting course for sustainable change, as well as evidencing a functional, broad base of consensus (Kotter, 1996, p. 123). Both the 2014 Fifth-Year Report, as well as participant interviews intimate that the early successes of the governance model validate the decision to restructure the decision-making bodies. While still contentious at times, the College Corporation, Board of Trustees, President,
head of the religious order, and Faculty Senate are learning the new roles as issues emerged and the structure is tested.

However, there is still work ahead related to the decision-making structures of the institution. While the new governance structure addressed many of NEASC’s concerns as well as the College community’s concerns related to the decision-making model, many feel that the new structure does not adequately represent faculty members. The faculty members reference the recent appointment of the VPAA as an instance in which shared governance is not fully articulated.

From the faculty point of view, the Chair of the 1999 Self-Study emphasizes that the appointment “was perceived as an overreach by the President, a disregard of faculty, and that the [head of the religious order] certainly shares in that, as do the trustees.” The Chair of the 2009 Self-Study echoes this sentiment; while VPAA appointments have taken place during his tenure, the faculty has always reserved the right of refusal on particular candidates, which had not taken place in this instance.

As the College continues to test its new governance structure, all interview participants concede that the faculty’s appropriate voice in the process must undergo continued examination to achieve a satisfactory balance among the College leadership, religious order, trustees and faculty in the planning and decision-making process. While shared governance may not involve shared decision making, the College seeks a structure by which every representative body is given appropriate voice in the business of the institution.

The College has experienced some early indications of how its new governance structure will impact the work of the institution, as well as experienced some early wins in expedient decision making under the new structure. In order to preserve the momentum of these initial successes, the
College will inevitably sustain further changes and seek to anchor these new approaches to decision making through strategic planning for the 21st century.

While structural changes may have noticeably taken hold with the establishment of new governing bodies, attitudes and behaviors that are deeply entrenched in the culture aren’t as easily changed. As such, Kotter places particular emphasis on the need to anchor new approaches in order to sustain change, which will eventually create a cultural shift in the long-term.

Kotter presents several considerations in sustaining organizational change, beginning with leadership’s modeling of the new change. To this point, the College President is central to signaling respect and belief in the new governance structure, utilizing the bodies in a consultative manner to broadly broker institutional decisions.

Secondly, true evidence of a sustainable change will take place during leadership transitions; as the College experiences Board and executive leadership transitions, the ability of these individuals to successful integrate into the governance structure will sustain the current change momentum. Kotter underscores the potential for derailment of successful change through poor succession planning. The sustainability of the College’s change campaign relies on the adherence of future leadership as much as current leadership (Kotter, 2008).

**Conclusion.** The issue of shared governance, as with any change process, is a dynamic process, which will continue to evolve over time for the College. The CIHE Standard 3.15 states that “[t]he effectiveness of the institution’s organizational structure and system of governance is improved through periodic and systematic review.” The very nature of the decennial reaccreditation process guarantees a periodic review of every aspect of the institution of higher education. As environmental factors change over time, the College will continually reconsider
the governance structure through the lens of public interest, the institutional mission, and adherence to accreditation standards.

The accrediting body provides both accountability and an external impetus to ensure that a member institution reviews, reflects and changes accordingly, in order to optimally fulfill its mission and purpose. The ideal of continual improvement, upon which peer review is based, inspires member institutions to remain dynamic and responsive to internal and external factors in order to best serve students. As such, the College’s governance model never reaches a final state, but serves as an appropriate contemporary model.

**Literature Review: Relationship to the Findings**

This study began with the consideration of the regional accreditation body’s evolution of roles and responsibilities as the nature of higher education changed throughout the twentieth century. As the United States Department of Education (USDE) played a more prominent role in post-secondary education through institutional grants, military veteran benefits, and direct student lending and scholarships, the need for oversight and discernment of educational quality emerged.

The regional accreditation agencies assumed the regulatory role by default, as the USDE proved ill-equipped to provide oversight to the thousands of Title IV-eligible U.S. post-secondary institutions, especially given higher education’s post-war growth during the twentieth century. In their original state, the regional associations established under collegial, consultative purposes, providing a venue for member institutions to share best practices and broker common ground in curricula and programming. The introduction of accreditation authority during the first half of the twentieth century (at the USDE’s behest), led to regional accreditation agencies that increasingly strive to prove consultative as well as regulatory.
Creating Change Culture

The findings of this case study are affirmed by similar scholarship related to the accreditation agency’s impact on institutional change, and the dynamic that transpires through the cycle of self-study and continual improvement. In a study of Farleigh Dickinson University’s continuance of Middle States accreditation as well as an array of professional accreditations, Ferrara (2007) concludes that accreditation itself does not lead to institutional improvement; rather, improvement takes place through continuous efforts to adhere to accreditation standards throughout the institution. Furthermore, the culture of assessment generated through the accreditation cycle repositions institutional focus on institutional outcomes, thereby substantiating success on the program level (Ferrara, 2007).

At Richardson County Community College, the researcher found accreditation to prove impactful related to positive changes in educational quality and the student learning outcomes that are substantiated through the self-study process, but prone to subjectivity given the nature of peer review. At the same time, the college community does not desire more standardized, prescriptive evaluation by the accreditation body, as it may pose a threat to its unique institutional culture (Saunders, 2007).

Rubin’s (2012) study of three New England institutions characterizes NEASC as a “central catalyst” for implementing institutional assessment, but also finds that “improvement was always an equal goal, if not a more significant goal, than accountability” (p. 245). In effect, assessment as prompted by the accreditation agency articulates and measures the outcomes across the institution, rather than prescribing them.

Conclusion. The findings of this case study effectively illustrate the accreditation body’s shift from a largely consultative role to regulatory as well, enjoining member institutions in a
culture of continuous improvement, which necessitates the institution to change and amend structures and practices to reflect the evolution of the accreditation standards. All three case studies depict the way in which each institution adjusted from an input-driven culture to outcome-driven practices, reflective of student success and institutional accountability.

The interplay between accountability and continual improvement in accreditation’s purview is illustrated by all four case studies as well. In each instance, the perception of the internal stakeholders shapes attitudes and subsequent efforts in reaction to an impending accreditation review, as opposed to a depiction of the accreditation agency imposing its will upon the institution. Ultimately, the faculty and administrators are the agents of change and stewards of continual improvement within the institution, while the accreditation agency provides regular guidance and impetus to perpetuate these efforts.

Change Engagement

As the cultural dialogue has persisted regarding the value of a college degree, the traditional measures of institutional quality have subsequently endured challenges. The general public may look to a definitive ranking of institutional quality, as offered by the *U.S. News and World Report*. Measures such as college rankings hinge on a series of inputs to define quality, such as “endowments and expenditures per student, class sizes, faculty-student ratios, and the quality of the freshman class […]” (Zemsky, 2005, p. 44).

Over the last two decades, higher education and its accrediting agencies have shifted to a focus on outcomes as well as inputs, in order to measure institutional quality. With a greater emphasis on learning outcomes and their application to career readiness, accreditation has additionally posed a more rigorous expectation for institutions to both articulate and evidence degree objectives and relevance to graduate career expectations.
In a sense, the move to better evidence outcomes harkens to Zemsky’s assertion that the agencies would become more formulaic, formal, and prescriptive in their interaction with member institutions (Zemsky, 2011). As the federal government and the USDE mandate a return on investment from Title IV-eligible institutions, the accreditation agencies must substantiate a rigorous protocol by which member institutions continue in accreditation.

In the case of the College, the governance structure issue was seemingly an input-driven matter, which does not directly impact the student learning outcomes. For the sake of argument, a move to a broader governance model beyond the scope of the founding religious order may very well empower the College with better guidance relative to the needs of the larger community, including the business community where many of the trustees are employed. Despite the focus of the USDE (and the accreditor, in turn) toward an increasingly outcomes-driven institutional review, matters of input, such as board conflicts of interest and credit-hour regulation, persist in the prescriptive realm of the reaccreditation review.

A central finding of the study entails the culture of change that the accreditation process promotes, and through the cycle of reports and correspondence culminating in the decennial self-study and visit, the institution must substantiate progress in the areas of emphasis. The institution examined in this case study was characterized by all interview participants as historically change-resistant, largely due to its century-long history of success; and compounded by the community’s apprehension related to potentially shifting from religious tenets which contributed to the religious order’s sustenance for more than a millennium.

Anne Neal, a vocal opponent of the incumbent accreditation system, cites instances such as the College’s governance issue as “harmful intrusion” by accreditation agencies, as “the system has empowered the accrediting cartels to impose their own standards and agendas on the schools
they are meant to be helping” (Neal, 2008, p. 26). In consideration of some of the more egregious disputes between regional (and professional) accreditation agencies and member institutions, Neal argues that agencies prove misguided in their rigidity in some instances, leading to homogenization and deterioration of quality in higher education. Neal further argues the peer-review system, in which the agencies are simultaneously gatekeepers and “self-improvement experts,” poses a clear conflict of interest (NACIQI, 2012).

In 2015, Neal’s concern was reflected in controversy regarding the Accrediting Commission for Community and Junior Colleges (ACCJC), which sought to strip accreditation from the City College of San Francisco (CCSF), a member institution. The agency and the institution primarily disagreed on both the nature of improvement and timeline necessary to improve the College’s financial controls, governance structure, and evaluation procedure, which precipitated the ACCJC to levy sanctions and threaten closure of the institution. While the ACCJC argued that their findings reflected the high standards necessary to protect students and the public; CCSF questioned the rationale behind closing California’s largest community college, potentially impacting ninety thousand students. The sanctions and potential closure were particularly controversial, given the Commission’s findings weren’t related to substandard instruction or academic outcomes.

Having earned a two-year reprieve from the Commission, the California community college Board of Trustees voted in November 2015 to establish a new system of evaluation for the system, citing a disproportionate amount of sanctions meted by the ACCJC, which are largely regulatory and exhibit little bearing on academic quality. Obviously, the California community college system would need to seek USDE approval if it were to establish an independent accrediting body (Asimov; Rivera).
Conclusion. A striking parallel exists between the College and CCSF, in defending institutional autonomy in the face of accreditor intervention. Should the accreditation agency monitor institutional inputs, when the institution is evidencing satisfactory academic outcomes? Neal (2008) and Zemsky (2005) criticize the prescription of institutional characteristics in the same vein, positing that a culture of uniformity jeopardizes the diversity of U.S. higher education.

Due to this criticism, the accreditor as regulator remains under question. The national dialogue continues regarding a contemporary accreditation model which best serves the public interest as gatekeeper and quality advocate. The impending reauthorization of the Higher Education Act (HEA) has involved an ongoing dialogue since its expiration in 2013. Incremental change in the accreditation agencies’ scope, powers and responsibility is likely, rather than a disruptive shift in accreditation’s organization. The five-year renewal cycle of the HEA is reflective of the need for continual improvement and consistent change engagement in response to the ever-changing landscape of higher education. Market needs and emerging education innovations demand new considerations and highly responsive guidelines for the distribution of federal aid.

Implementing and Sustaining Change

Despite the regional accreditation agencies’ shift to outcomes-based foci in the last decade, voices continue to emerge in the debate that seek alternative accreditation pathways, designed for non-traditional post-secondary education. Entities such as Entangled Solutions, under the leadership of Paul Freedman and Michael B. Horn, propose new Quality Assurance Entities (QAE), which would oversee institutional partnerships with short-term credentialing programs. With the recent popularization of coding boot camps and other non-degree credentials, programs driven by quantifiable metrics such as skills attainment, monetary return on investment, and
student satisfaction challenge the traditional accreditation structures to offer an expedient, dynamic review process (Entangled Solutions, 2015).

On the national stage, several figures have acknowledged the need for alternative pathways to regulate innovative higher education credentialing models. Ted Mitchell, Undersecretary of the USDE, has stated that the emergence of MOOCs, boot camps and competency based programming has challenged accreditation agencies to broker a differentiated, outcomes-based model of quality assurance, as “[t]he normal mechanism we use to assess quality in higher education, accreditation, was not build to assess these kinds of providers” (Mitchell, 2015).

The USDE is confronted with numerous proposals to address accreditation as higher education continues to evolve beyond the constructs of the traditional, brick-and-mortar 19th century institution. In recent decades, the regional and professional accreditation agencies have amended standards and practices in response to the emergence of online education, for-profit institutions, public-private partnerships, and other innovations that have challenged the traditional modes of higher education.

**Conclusion.** Comprehensive quality assurance across the diverse spectrum of U.S. post-secondary education has presented a challenge for over a century, since the federal government first provided institutional and individual funding. The regional accreditation model remains as the best option to govern the seven thousand post-secondary Title IV eligible institutions. As opposed to a wholesale reorganization of the regional accreditation structure, or replacement by an alternative structure, additional accreditation pathways will likely emerge to provide expedient approval of new education delivery models.

The accreditation agency expects each member institution to remain a dynamic environment, promoting the culture of continuous improvement that is supported through periodic peer review.
Similarly, the accreditation agencies must exhibit the same characteristics, continuing to examine the dual purposes of accountability and continual improvement, upholding these two ideals while respecting the autonomy of the institution. The regional accreditation agencies will engage in ongoing revision of their standards to accommodate new methods and modalities in higher education, while striving to maintain the fine balance between colleague and regulator.

**Conclusion**

This case study originated through an exploration of the research question, “In what way does the cultural shift in accrediting bodies result in a subsequent shift in colleges and universities?” Since its inception in 1885, the New England Association of Schools and Colleges evolved from a loosely associated, turn of the century organization of secondary schools and institutions of higher education, seeking a mutual understanding on the best course of study for college preparatory students. NEASC’s 1952 assumption of accreditation and subsequent review of all Title IV eligible New England institutions grew out of the need of the U.S. Department of Education to monitor the quality of institutions who seek federal funding. Throughout the last seven decades, a national debate has ensued related to the nature of the accreditation agency’s responsibilities and review process, the manner in which federal funding is awarded to individuals and institutions, and ultimately, whether the system of peer review is adequate for the dynamic and diverse culture of post-secondary education.

In this context, the system of accountability maintained by the accrediting agency is both consultative and regulatory in its charge. As illustrated in the case study of the College’s governance change, NEASC’s shift from broad, subjective organization and governance standards, to a prescriptive measure for board composition precipitated an immediate change in the College’s organizational structure. The College’s creation of change culture was a decade-
long process due to a lack of urgency to change. Why abandon a governance model, which sustained the College for a century, and the religious order for fifteen centuries, for a model explicitly representative of a broader public interest?

The College’s change engagement took place only when continued accreditation was potentially jeopardized, and Commission representatives underscored the ramifications of maintaining the College’s historical structures. Early indications of successful implementation and sustainability of the new governance structure reflect an efficient and functional system which equally values the Board, College leadership and the religious order, as evidenced by initial decisions brokered since the change has taken place.

As assessment of institutional quality becomes more outcome-driven, focusing not only on degree outcomes but also graduation rates, alumni employment and salary data as success indicators, the accrediting agency’s influence to drive change at colleges and universities will become increasingly evident. As such, maintaining the autonomy of the institution, as well as its ability to maintain unique characteristics that are integral to its historical identity, will demand a fine balance to simultaneously ensure adherence to accreditation standards.

Cultural pressures continue to mount, and the delicate balance among the federal government, state government and accreditation agencies still draws criticism. Opponents claim that accreditation is neither sufficiently dynamic nor innovative in light of the emerging pathways to post-secondary credentials; accreditation does not exhibit sufficient transparency related to the findings and outcomes of member institutions’ reviews; and the agencies aren’t sufficiently stringent with institutions that fall short of serving the public good.

Subsequently, a range of alternatives are presented, including the nationalization of accreditation; a reconfiguration of agencies from regional affinity to a discipline-specific or tiered
construct; and a system by which top universities are “fast-tracked” and avoid the full decennial review.

The peer review system remains the best alternative for member institutions as well as the USDE, which couldn’t conceivably oversee the seven thousand Title IV eligible post-secondary institutions in the United States.

**Recommendations for Practice**

The findings of this case study highlighted the change process at one of New England’s Catholic baccalaureate colleges and its dynamic with NEASC, the regional accreditation body, while enacting a restructuring of institutional governance structure.

This case study informs practice in several ways, as several hundred institutions share the characteristics of establishment in the 19th century by a religious denomination. In consideration of history and a religious mission, institutions must proactively meet the challenge of reconciling institutional identity with the expectations of the regional accreditation agency as well as the broader market. Doing so requires long-range planning which “brings the outside in”: consultation with peer institutions who continue to evolve in response to external demands, as well as practitioners in the field who successfully integrate new innovations alongside long-standing structures.

Nearly every sector of the institution, and its corresponding accreditation standard, demands a dynamic approach to its consideration in both present and future state. The concept of continuous improvement through the accreditation cycle exists in the assumption that higher education institutions do not remain in static state, but must continue to evolve to meet changing environmental factors as well as the changing needs of the student body. The increased focus on
learning outcomes, as opposed to inputs, necessitates institutions to evidence student success and the manner in which preparation takes place through degree programs.

Collaboration with both peer institutions and the accreditation is key to adoption of best practice and awareness of the way in which member institutions are adjusting practice in order to successful respond to student needs and market challenges.

Secondly, the College’s experience exemplifies the necessity of open communication to successfully inform and engage all influencers in the change process. By aligning assumptions and working with a common set of knowledge, broad dialogue both empowers and enables efficient, inclusive decision-making which considers all perspectives and allays all reservations. Central to this conversation is a representative from the accreditation body, on whom the institution should rely to fully understand the spirit of the accreditation standards, as well as ways that peer institutions are answering similar challenges successfully.

While communication internally is crucial, member institutions must fully engage in the opportunities afforded by the accreditation agency for input, development, and advocacy. As the institution is a dynamic entity, the accreditation agency must remain equally dynamic in order to implement changes in standards reflective of the evolving needs of member institutions; emerging innovations in the higher education landscape; and growing demands of the USDE.

Given that peer review is central to the accreditation process and the Commission is comprised of leadership from member institutions, the membership sets the agenda. Essentially, every institution has an equal stake in the work of the accreditation body, and must choose to engage in the process to influence positive change.
Recommendations for Future Research

This case study depicts a member institution’s relationship with the regional accreditor, and the cultural shift currently underway. To gain a better understanding of regional accreditation’s impact on member institutions, a comparative analysis is worthwhile to ascertain the common challenges taking place across accredited institutions, and how colleges successfully respond and adjust to shifting expectations.

The array of institutional governance models in New England alone, ranging from for-profit and non-profit; public and private; religious and secular leads to a broad diversity of missions and purposes which all must meet a common standard through the accreditation body. A study of a range of governance models, which successfully meet NEASC standards, could yield beneficial findings in the manner that institutions successfully represent the public interest while maintaining institutional identity.

In addition, a study of religious affiliated institutions, which successfully undergo strategic change in response to external oversight (regional and professional accreditation associations, national and state government entities), while maintaining mission identity, proves worthwhile.

Lastly, a broader study of institutions, which have undergone a transition from religious presidential and board leadership to a lay leadership structure, entails a potential impact on the culture of the institution. While successful integration of the laity into the religious infrastructure proves challenging to historically religious institutions, many colleges are finding this shift is necessary, especially in the Catholic Church, given the dwindling number of qualified clergy to assume leadership roles.
References


National Advisory Committee on Institutional Quality and Integrity (2012, February 8). Higher


Sibolski, E. H. (2012). What's an accrediting agency supposed to do? Institutional quality and improvement vs. regulatory compliance: do everything possible to let others know that we are...
open to discussion and that we do not believe that everything we do is perfect the way it is.


Appendix A

Northeastern University, College of Professional Studies

Name of Investigator(s): Dr. Joseph McNabb, Principal Investigator; William Boozang, Student Researcher

Title of Project: Regional Accreditation’s Impact on Institutional Change

Informed Consent to Participate in a Research Study

We are inviting you to take part in a research study. This form will tell you about the study, but the researcher will explain it to you first. You may ask this person any questions that you have. When you are ready to make a decision, you may tell the researcher if you want to participate or not. You do not have to participate if you do not want to. If you decide to participate, the researcher will ask you to sign this statement and will give you a copy to keep.

Why am I being asked to take part in this research study?

We are asking you to participate in this study, given your role at College and the NEASC decennial self-study process.

Why is this research study being done?

The purpose of this research is to explore the change management process at College and the extent to which interaction with NEASC influences institutional change. In addition, this study will consider the way in which change is envisioned and implemented.

What will I be asked to do?

If you decide to take part in this study, we will ask you to participate in two 45-60 minute interviews. The first interview will explore institutional changes that have taken place at College over the last decade, while the follow-up interview will provide further context and detail, in light of the entire body of interviews and use of the NEASC archival materials.

At the conclusion of each interview, the transcript will be sent for your review to ensure accuracy.

Where will this take place and how much of my time will it take?

You will be interviewed at a time and place that is convenient for you. Each interview will take about one hour, which allows 45 minutes of questions and 15 minutes for additional information that you wish to offer.

Will there be any risk or discomfort to me?

There is no foreseeable risk or discomfort.
**Will I benefit by being in this research?**

While there will be no direct benefit to you for taking part in the study, Northeastern University may benefit from an external study of the institutional change process.

**Who will see the information about me?**

Neither the identity of the institution nor your identity as a participant in this study will be known. The researcher will take measures to ensure both institutional and individual characteristics are only included when relevant to the study.

Your part in this study will be confidential. Only the researchers on this study will see the information about you. No reports or publications will use information that can identify you in any way or any individual as being of this project.

After the submission of this study, all audio recordings and notes will be destroyed.

In rare instances, authorized people may request to see research information about you and other people in this study. This is done only to be sure that the research is done properly. We would only permit people who are authorized by organizations such as the Northeastern University Institutional Review Board to see this information.

**Can I stop my participation in this study?**

Your participation in this research is completely voluntary. You do not have to participate if you do not want to and you can refuse to answer any question. Even if you begin the study, you may quit at any time.

**Who can I contact if I have questions or problems?**

If you have questions about this study, please contact William Boozang (boozang.w@husky.neu.edu), the person responsible for this research, or Dr. Joseph McNabb (j.mcnabb@neu.edu), the Primary Investigator.

**Who can I contact about my rights as a participant?**

If you have any questions about your rights in this research, you may contact Nan C. Regina, Director, Human Subject Research Protection, 490 Renaissance Park, Northeastern University, Boston, MA 02115. Tel: 617.373.4588, Email: n.regina@neu.edu. You may call anonymously if you wish.

**Will I be paid for my participation?**

Participation is on a voluntary basis.
Will it cost me anything to participate?

No costs will be incurred through this study.

I agree to take part in this research.

Signature of person agreeing to take part

Date

Printed name of person above

Signature of person who explained the study to the participant above and obtained consent

Date

Printed name of person above
Appendix B

Recruitment Letter

Greetings,

My name is Bill Boozang, and I am a Boston area college administrator and 1994 graduate of St. Anselm College. As a student in the Doctorate of Education program at Northeastern University, I am completing an institutional case study of St. Anselm College and the impact of the NEASC decennial self-study process on institutional change.

As part of this case study, I seek to interview key participants in the 1999 and 2009 self-studies; therefore, I plan to recruit both President [redacted], the chairs of both self-study committees, and the NEASC institutional liaison.

Participation in this study will entail two one-hour interviews. During the first interview, a set of questions will be asked on key changes at St. Anselm College over the last decade; the context for these changes; and the change process. After analyzing the initial interviews, a follow-up interview will take place.

Participation in this case study is voluntary. Please reply if you wish to participate, as I will not contact you again to solicit participation otherwise. Any prior mention of this study should be ignored. No one outside of the research team (the primary investigator, the researcher, the dissertation readers, and the IRB coordinator) will have knowledge of your participation in this study.

Please reply to boozang.w@husky.neu.edu with any further questions or concerns, if you are willing to participate in this study, and your availability during the following dates:

All interviews will take place at a location of your choosing.

I appreciate your assistance in this project.

Regards,

Bill Boozang, EdD Candidate, Northeastern University

Dr. Joseph McNabb, Primary Investigator; Northeastern University Professor of Practice
Appendix C

Interview Guide

This initial interview is a component of my research, entitles Regional Accreditation’s Impact on Institutional Change. The first portion of the interview will comprise a common set of questions used for all participants. At the end of the interview, I’ll invite you to provide any further thoughts or insights that you consider important to the consideration of College’s change process.

Identification of Change

1) Over the last fifteen years, what have been the most significant changes that have taken place at the College?
2) Why was each of these changes important or necessary to the institution? If neither important nor necessary, why did the change take place?
3) In what way was each change relevant to maintaining the mission or ideals of the College?
4) In what way was each change relevant to practical aspects of maintaining the College’s viability?
5) Among the changes that have taken place, with what changes have you agreed or disagreed? From your perspective, with what changes have the following agreed or disagreed?
   a. Faculty?
   b. Administration?
   c. Community?
   d. Trustees?
   e. Students?
   f. Alumni?
6) In retrospect, in what way has College’s culture transformed due to these changes?

Implementation of Change

1) Who were the primary agent(s) in the change process?
2) In what way did the agents frame the context for each change?
3) In communicating the need for change, did community “buy in” factor into the process? Was it subsequently secured for each change?
4) Who was instrumental in implementing the changes? Did they do so voluntarily, or were they appointed to do so?
5) Were there detractors during the change process? If so, what were their objections? How were they addressed?
6) In retrospect, what were the expected outcomes of each change? What were the unexpected outcomes?
7) Is each of these changes finished, or ongoing?
8) What are the most tangible effects of the changes that have taken place?
Influencers of Change

1) What precipitated each change, which has taken place in the last fifteen years?
2) Did the necessity to change emerge suddenly, or over time?
3) Among the institutional stakeholders, which body was most insistent on the necessity for change?
4) What role did the NEASC decennial self-study process play in identifying the need for change, and the progress made toward implementation of change?
5) As a direct result of decennial self-study visits and visiting teams’ reports, have any changes been considered?
   a. How would you characterize the Commission’s position on the change recommendations that the visiting team’s report made?
   b. Has the Commission requested progress reports on change implementation?
   c. Did the college community view any of these changes recommendations as non-negotiable?
6) In your view, which of the changes were inspired from within? NEASC inspired?
7) From your perspective, what is NEASC’s role relative to College?

Please provide any further thoughts, insights or context that is important to understand the recent changes that have taken place at the College.