Position Paper

Accreditation at the Crossroads: Threats and Opportunities for Christian Colleges and Universities

Center for Academic Faithfulness & Flourishing

About the Center for Academic Faithfulness & Flourishing

The Center for Academic Faithfulness & Flourishing exists to empower Christian colleges and universities to advance their faith-based missions, equip campus leaders with the resources necessary to flourish in our present age, and encourage broader support for these unique and valuable institutions. To advance this mission, CAFF seeks to accomplish three goals: (1) Reassert institutional faithfulness by developing a cohesive and credible counter-narrative to ideologies that undermine Christian higher education; (2) Redesign organizational networks by helping Christian colleges and universities cultivate ideologically aligned exchange partners; and (3) Reinvigorate institutional flourishing by designing initiatives that strengthen the governance, management, and financial position of faith-based institutions of higher education.

Accreditation at the Crossroads: Threats and Opportunities for Christian Colleges and Universities

Robert Manzer

Executive Summary

Trustees and senior administrators at Christian colleges and universities are keenly aware that their institutions' financial solvency depends largely upon maintaining external accreditation. Less fully understood, however, are emergent trends that threaten to fundamentally transform the way all postsecondary institutions in the United States will be required to interact with accreditors. This position paper reviews each of these trends and charts a way forward for Christian higher education. After exploring how the regional accreditors' expanding role has rendered them unstable gatekeepers for access to federal student aid, the paper demonstrates how two movements—Diversity, Equity, and Inclusion (DEI) and the Consumer Protection Reform Movement—narrow what counts for academic quality in troubling ways. The paper concludes by elucidating how the U.S. Department of Education's recently formed accreditation marketplace permits new pathways for quality assurance that protect, rather than erode, institutional autonomy, and by arguing that Christian higher education should be at the vanguard of creating new institutional-type accreditors whose standards reflect its unique mission and identity.

About the Author

Robert Manzer is President of the *American Academy for Liberal Education*, the higher education/charter school accreditor focused on supporting traditional, text-based, and classical liberal education. Over a thirty-year career in higher education, he served in faculty and senior administrative roles at four faith-based independent colleges: University of Dallas, Nebraska Wesleyan University, Ohio Northern University, and St. Edward's University. An expert on innovation and higher education regulation, he co-founded the *Acadeum* platform that supports new pathways and collaboration among more than four hundred colleges, professional associations, education companies, and employers. He also founded the twenty-year-old United Methodist College Washington Consortium. He has authored numerous articles and opinion pieces in leading academic, policy, and current affairs publications, including *American Political Science Review, American Journal of Political Science, Tocqueville Review, American Enterprise Institute, National Review, Washington Examiner, eCampus News, Dallas Morning News, San Antonio Express News,* and *Texas Catholic*. He holds a B.A. in Political Science from Carleton College and an M.A. and Ph.D. in Political Philosophy from the University of Chicago.

Suggested Citation

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Director's Preface

A signature characteristic of the American system of higher education—its institutional diversity—is due in large part to the existence of hundreds of faith-based colleges and universities that offer degree programs in accordance with a particular educational vision. These unique institutions provide a wide range of educational options that reflect and thereby serve the religious diversity of the United States. For this reason, the quality assurance mechanism used by the federal government to determine a college's eligibility to participate in the federal student aid program—namely, institutional accreditation—has historically employed guidelines for review that are appropriate to a diverse array of institutional missions. But what happens when educational standards originally intended to facilitate the pursuit of mission across various institutional types become vehicles for producing ideological and programmatic conformity?

In the following position paper, Robert Manzer demonstrates how postsecondary accreditation has shifted in ways that should concern all those who care about the future of Christian higher education. He describes the regional accreditors' increasingly precarious position and explains how ascendent approaches to Diversity, Equity, and Inclusion (DEI) and the Consumer Protection Reform Movement threaten to compromise the ability of many Christian colleges to faithfully pursue their institutional missions. Manzer concludes by proposing an alternative approach that offers an offramp from accreditation's current

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trajectory by replacing its one-size-fits-all character with a bespoke approach mindful of and responsive to the distinctive character of faith-based colleges and universities.

As governing boards and senior administrators across Christian higher education grapple with the twin imperatives of mission fidelity and financial solvency, special attention must be paid to an accreditation regime that significantly shapes the character and economics of American higher education. For those convinced that gathering threats reveal a need for course correction, Manzer's proposal merits serious consideration.

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Introduction: Accreditation at the Crossroads

Trustees of Christian colleges and universities are aware that their institutions are accredited by commissions that are recognized by the U.S. Department of Education. They are also aware that access to Title IV student financial aid is contingent upon this accreditation and that their institutions' financial solvency depends on maintaining this access. Finally, they are aware that many, if not most, of their students rely on federal aid to attend college, and that not having access to it would be catastrophic for these students. Because most institutions have had a stable relationship with their accreditors for decades (although there are exceptions), most trustees have not had to think about the consequences of losing accreditation. Such a loss would entail diminished prestige, financial instability, and increased difficulty recruiting new students. While this scenario remains unlikely, it is worth noting that withdrawing accreditation is what these commissions hold over institutions to gain compliance with their standards.[1]

The goal of this position paper is to provide guidance for trustees of Christian colleges and universities during a time of revolutionary change in accreditation—change that presents both threats and opportunities. The

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1   Emily Belz, "After 140 Years, Alliance University Closing," *Christianity Today*, July 1, 2023, https://www.christianitytoday.com/news/2023/july/alliance-university-closing-nyack-new-york-higher-ed.html.

first three sections cover three threats: the potential interruption of federal financial aid, the compromise of institutional autonomy brought on by the accreditors' embrace of Diversity, Equity, and Inclusion (DEI), and the sector-wide disruption occasioned by the consumer protection higher education reform movement. Christian colleges and universities ignore these threats at their peril.

The final two sections of this position paper cover an opportunity whose magnitude is as great as that of the above-mentioned threats. In 2020, the U.S. Department of Education established new rules that ended the monopoly of seven "regional" accreditors over their geographic areas and eased the path for forming new ones.[2] This paper examines the resulting new accreditor "marketplace" and the opportunity it affords for institutions to switch their accreditors or work to

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create new ones. Most institutions are just awakening to this opportunity. Christian colleges and universities should seize it. It is their best path to effectively safeguard and achieve their distinctive missions.

Despite the threats it poses, this revolutionary moment in accreditation can be turned to the advantage of Christian colleges and universities. The time is right to act.

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2   U.S. Department of Education, "Student Assistance General Provisions, The Secretary's Recognition of Accreditation Agencies, The Secretary's Recognition Procedures for State Agencies," 84 FR 58834 , *Federal Register,* November 1, 2019, https://www.federalregister.gov/documents/2019/11/01/2019-23129/student-assistance-general-provisions-the-secretarys-recognition-of-accrediting-agencies-the; Natalie Schwartz, "Ed Department Issues Final Rules on Accreditation and State Authorization," *Higher Ed Dive,* October 31, 2019, https://www.highereddive.com/news/ed-dept-issues-final-rules-on-accreditation-and-state-authorization/566386/.

The First Threat: The Precarious Money Flow

Many commentators have noted how government agencies founded decades ago for narrow purposes are now performing much larger roles for which they are poorly suited.[3] Accreditors fall into this category. They were launched in the late nineteenth and early twentieth centuries to distinguish actual universities from pretenders, to separate the wheat from the chaff. This purpose was adapted mid-century to satisfy the U.S. government's interest in assuring federal student financial aid was well spent. The following story of this transition reveals not only the difficulty of repurposing accreditation but also how the transition to an expanding role has become increasingly unstable. The accreditors' gatekeeper role is now quite precarious, putting at risk uninterrupted access to federal financial aid and, in turn, the solvency of most Christian colleges and universities.

As noted, accreditors were originally focused on *authenticating* whether a given school was a legitimate college or university. The "diploma mill" problem—schools granting degrees without requiring appropriate coursework— has consistently bedeviled American higher education, and it was *the* problem

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3   Holman W. Jenkins, Jr., "Brain Death at the FTC and FCC," *Wall Street Journal,* October 6, 2023, https://www.wsj.com/articles/brain-death-at-the-ftc-and-fcc-d5d92e7b.

accreditation arose to solve.[4] The original accreditors were membership associations engaged in a blend of brand protection and category marketing.[5] Their guiding questions were: "What is a college?" and "How might authentic colleges and universities work together to clarify their identity and facilitate the transfer of students' credentials?"[6] Accreditors responded by identifying basic criteria such as a certain student–faculty ratio, required numbers of library books, and appropriate qualifications for professors. What mattered was whether such basic criteria were met. Thumbs up, thumbs down.

Initially, this bare-bones model survived the federal government's effort to repurpose accreditation to ensure federal dollars were well spent. The federal government had first turned to states for this function, but the state effort failed due to its inability to prevent schools of questionable quality from receiving funding.[7] It then sought to make use of the accreditors' expertise so as to avoid having to create a new federal bureaucracy.[8]

Thus, at the start, federal oversight of accreditors was minimal, and it remained so as long as accreditation was limited to a relatively simple form of authentication.[9]

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Accreditation changed decisively in the early 1990s in response to the first student loan crisis. The stage was set for this change by four widely regarded reports released in the 1980s, including *A Nation at Risk*.[10] These reports argued that the decline of American secondary and post-secondary education was so steep that it threatened American national competitiveness. Against this backdrop of

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4   Paul L. Gaston, *Higher Education Accreditation: How It's Changing, Why It Must* (Sterling: Stylus, 2014), 18-19, 28.

5   See Peter T. Ewell, *U.S. Accreditation and the Future of Quality Assurance: A CHEA Tenth Anniversary Report* (Washington, DC: Council for Higher Education Accreditation, 2008), 53; Sondra Wolfer, "Nine Product Category Marketing Examples to Inspire Your Own," *Hubspot Blog*, March 10, 2023, https://blog.hubspot.com/marketing/product-category-marketing.
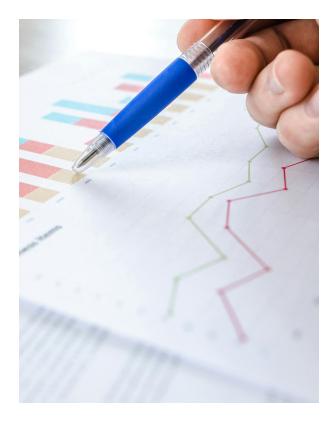
6   Gaston, *Higher Education Accreditation*, 18; Stanley O. Ikenberry, *Where Do We Take Accreditation?* (Washington, DC: *Council for Higher Education Accreditation,* 2009), 3, https://www.chea.org/sites/default/files/presentations/2009_AC_Where_Do_We_Take_Accreditation_Ikenberry.pdf.

7   Gaston, *Higher Education Accreditation*, 21.

8   U.S. Library of Congress, Congressional Research Service, *An Overview of Accreditation of Higher Education in the United States*, by Alexandra Hegji, R43826 (October 16, 2020), 7-8, https://crsreports.congress.gov/product/pdf/R/R43826.

9   Ewell, *U.S. Accreditation and the Future of Quality Assurance*, 38, 41.

10   David P. Gardner et al., *A Nation at Risk: The Imperative for Educational Reform. An Open Letter to the American People. A Report to the Nation and the Secretary of Education* (Washington, DC: National Commission on Excellence in Education, 1983), https://eric.ed.gov/?id=ED226006. The other reports were National Commission in Higher Education Issues, *To Strengthen Quality in Higher Education* (Washington DC, 1982), https://eric.ed.gov/?id=ED226646; William J. Bennett, *To Reclaim a Legacy: A Report on the Humanities in Higher Education* (Washington D.C.: The National Endowment for the Humanities, 1984), https://eric.ed.gov/?id=ED247880; National Institute of Education, *Involvement in Learning* (Washington DC, 1984), https://eric.ed.gov/?id=ED246833.

Facing this existential threat, accreditors acted to shore up trust. Their strategy was to use accreditation to turn universities into *data-driven, highly transparent enterprises* whose effectiveness could be readily grasped by government regulators and the public. This approach required universities to generate vast amounts of quantitative data on student learning outcomes and to demonstrate an ability to use that data within a "continuous improvement" process. Data acumen and transparency thus became the keys to maintaining accreditation. In this way, accreditors sought to shift student learning from a professor-governed mystery to a data-driven, transparent, and accountable operation. Their hope was that this strategy would establish a firm foundation for their gatekeeper role.[12]

sagging confidence in American education, Congress acted decisively in 1992 to address soaring levels of student loan defaults, and their actions included setting up state-level organizations called State Postsecondary Review Entities (SPREs) intended to supplement or replace accreditors.[11] Their goal was to create greater accountability for institutions receiving federal student aid.

The results have been mixed. On the one hand, this strategy has preserved the accreditors' independence for over thirty years. On the other hand, accreditors have faced unrelenting skepticism and criticism during this period, as universities have not become the transparent organizations envisioned. While the initial assault on accreditation subsided, it was followed by the Spellings Commission (2005), which called for altering or replacing the current accreditation system.[13] Similarly,

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11   Ewell, *U.S. Accreditation and the Future of Quality Assurance*, 46, 81; Ikenberry, *Where Do We Take Accreditation?*, 2.

12   Paul L. Gaston best captures how the student loan crisis of the early 1990s led the accreditors to consider many extensive changes at a gathering known as "the Tucson meeting," such as "surrendering the regional accreditors' territorial suzerainty and a decoupling of accreditation and eligibility for federal financial aid," before settling on shoring up their legitimacy (*Higher Education Accreditation*, 22-25). See also Stanley O. Ikenberry on how the accreditors led the "way in embedding the assessment of student learning outcomes and the constructive use of outcome data in the culture of academic institutions and programs" (*Where Do We Take Accreditation?*, 5). Finally, see Peter T. Ewell's discussion of the tension that arises "between accreditation's original values and purposes on the one hand and this newly adopted role of serving the interests of the federal government on the other" (*U.S. Accreditation and the Future of Quality Assurance*, 76).

13   Ewell, *U.S. Accreditation and the Future of Quality Assurance*, 47.

in his *Plan for a Strong Middle Class and a Strong America* (2013), President Obama called on Congress to either incorporate "measures of value and affordability into the existing accreditation system" or establish "a new, alternative system of accreditation."[14] With very few exceptions, Republicans and Democrats now seek to amend or replace accreditation with outcome thresholds or "bright line metrics," such as retention, graduation, and federal loan repayment rates. The Biden Department of Education appears ready to institute this new approach in 2024.[15]

The instability of accreditors' gatekeeping and the resultant precariousness of the flow of federal student aid should give Christian college and university trustees pause. They should also be concerned about the suitability of the student learning outcomes model imposed by accreditors on their campuses. Board members may be aware that administrators strive to present student learning according to this model, but they should also be aware that it has never been taken seriously by most faculty. The latter don't typically see themselves as data-driven,

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transparent learning facilitators, and their training in the model is superficial at best.[16] As a result, there is a yawning gap between how university instruction occurs and accreditors' expectations of how it should occur. Administrators work to conceal this gap, and faculty go along with them. Accreditors mostly ignore the masquerade, hoping they can eventually get institutions to their standard.[17] But their time is running out.

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14   Gaston, *Higher Education Accreditation*, xiii.

15   Natalie Schwartz, "Education Department Unveils Policy Proposals for Accreditation, State Authorization," *Higher Ed Dive*, January 4, 2024, https://www.highereddive.com/news/education-department-proposals-accreditation-state-authorization/703600/. See Paul L. Gaston, *Higher Education Accreditation*, chapter 4, for a comprehensive account of the post-1992 criticisms of accreditors and accreditation.

16   Gayle Greene, "The Terrible Tedium of 'Learning Outcomes,'" *The Chronicle of Higher Education*, January 4, 2023, https://www.chronicle.com/article/the-terrible-tedium-of-learning-outcomes; Robert Manzer, *The American University's Path to Illiberalism* (Washington, DC: American Enterprise Institute for Public Policy Research, 2023), https://www.aei.org/research-products/report/the-american-universitys-path-to-illiberalism/, 4; Linda Suskie, *Five Dimensions of Quality: A Common Sense Guide to Accreditation and Accountability* (San Francisco: Jossey-Bass, 2015), 157-158.

17   In rare instances, defenders of accreditors express their frustrations at the slow pace of institutional adoption of the student learning outcomes model. For example, see Ikenberry: "Countless academic programs and campuses have not thought seriously about the challenge of learning assessment outside the context of accreditation"; "While American higher education jealously guards the prerogative of reaching its own judgments of academic quality, it often fails to take the responsibility seriously. The challenge of quality assurance often fails to find a prominent place on the agenda of faculties, presidents and governing boards" (*Where Do We Take Accreditation?*, 6, 10).

The Second Threat: DEI and Institutional Autonomy

In working with accreditors, Christian colleges and universities depend on these associations' respect for institutional autonomy, a long-standing cornerstone of higher education accreditation. As Paul Gaston puts it,

> Accreditors … can usually be counted on to respect institutional autonomy: the right (within some constraints) of an institution or program to define its mission, to organize itself in pursuit of that mission, and to enjoy in that pursuit a healthy measure of self-determination, from the boardroom to the classroom.[18]

This respect underlies the well-known shorthand description of how accreditation is supposed to work: "Say what you're trying to accomplish, how you evaluate student success, and how many students actually succeed."[19] The accreditors' embrace of DEI has raised the question of whether this cornerstone remains in place for Christian colleges and universities.

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18   Gaston, *Higher Education Accreditation*, 6; See also Ewell, *U.S. Accreditation and the Future of Quality Assurance*, 66, on the related concept of "mission-centered review," and Judith S. Eaton, *An Overview of U.S. Accreditation* (Washington, DC: Council for Higher Education Accreditation, 2015), 3, https://www.chea.org/sites/default/files/other-content/Overview%20of%20US%20Accreditation%202015.pdf.

19   Kevin Carey, "Obama's Bold Plan to Reshape American Higher Education," *The Chronicle of Higher Education*, February 13, 2013, https://www.chronicle.com/blogs/conversation/obamas-bold-plan-to-reshape-american-higher-education.

Accreditors now expect DEI to *pervade* an entire institution. They impose this expectation in different ways. Of the seven regional accreditors, the Western (WSCUC) and Northwestern (NWCCU) have been most aggressive. The former has inserted DEI requirements into its Standards 1, 3, and 4[20] and developed a new "Equity and Inclusion Guide."[21] The latter mandates the institution-wide adoption of "diversity, equity, inclusion, belonging, and social justice."[22] Others are more circumspect, sticking to less conspicuous diversity statements,[23] webinars,[24] strategic plans,[25] and guiding principles. The Mid-Atlantic accreditor's (MSCHE) "Guiding Principle 3" (of 5) is representative:

> Throughout the seven standards, institutions should reflect deeply and share results on diversity, equity, and inclusion (DEI) in the context of their mission by considering at a minimum: goals and actions (Standard I); demographics and policies or processes (Standard II and VII); curriculum and services (Standard III and IV); assessments (Standard V); and resource allocation (Standard VI).[26]

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The accreditors insist that this new DEI expectation has not really changed anything fundamental about accreditation. They maintain that accreditation is still about an institution identifying its mission and demonstrating how it achieves student success. For them, the DEI expectation can be expressed in the reasonable requirement that institutions be accountable for the success of *all* the students they admit.[27] In this, the accreditors follow standard student success thinking that dismisses any concern about a lack of student preparation. "Access is not enough," as Vincent Tinto once wrote famously; institutions must take responsibility for the academic success

20   Western Association of Schools and Colleges Senior College and University Commission (WSCUC), *2023 Handbook of Accreditation*, https://www.wscuc.org/handbook2023/.

21   WSCUC, *Equity and Inclusion Guide*, Version 1, July 2022, https://wascsenior.app.box.com/s/jggri6rpzfdajpsk423knlcenkyl2vk2.

22   Northwest Commission on Colleges and Universities (NWCCU), "Ethics and DEI Statement," https://nwccu.org/who-we-are/dei-statement/. NWCCU recently removed its *Equity Resource Library* from its webpage, in which it called for institution-wide adoption of "equity-mindedness"—"the mode of thinking of practitioners that calls attention to patterns of inequity in student outcomes."
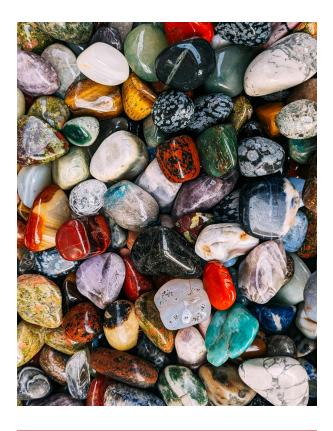
23   Southern Association on Colleges and Schools Commission on Colleges (SACSCOC), *Diversity, Equity, and Inclusion: A Position Statement* (Decatur, GA: SACSCOC, 2008, rev. 2023), https://sacscoc.org/app/uploads/2019/08/DiversityStatement.pdf.

24   Next Generation Assessment, "NGA Web Bites: Perspective from the New England Commission of Higher Education (NECHE) on DEI," https://www.youtube.com/watch?v=sO84a_rjMW8.

25   Higher Learning Commission (HLC), *Evolve: The 2025 Strategic Plan*, 2021, https://www.hlcommission.org/News-Reports/strategic-plan.html.

26   Middle States Commission on Higher Education (MSCHE), *Standards for Accreditation and Requirements of Affiliation,* 14th ed., July 1, 2023, https://www.msche.org/standards/fourteenth-edition/.

27   When defining its organizational purpose, WSCUC equates "equity" with "success for all students": "With Equity at its core—success for all students—WSCUC pursues excellence through rigorous accreditation standards applied flexibly, empowering all member institutions to achieve their missions." WSCUC, "About WSCUC," 2023, https://www.wscuc.org/about/.

"disaggregated data reporting." "Disaggregated" means data sets that include faculty, staff, and student body composition as well as student success metrics like course grades, retention percentages, and graduation rates broken down by race, ethnicity, sexual preference, gender identity, and so forth. The main purpose of this requirement is to focus institutions on "disparate impacts" or "equity gaps." For example, if African American students at a given institution have a lower graduation rate or lower grades on a given assignment than Asian American students, disaggregated data focuses institutions on addressing those gaps. A second purpose of disaggregated data is to give accreditors the means to hold universities accountable for closing those gaps.[29]

In this way, the accreditors' DEI expectation can lead to a highly coercive effort to change institutions. Evidence of equity gaps is used to put universities on the defensive. They then feel required to adopt measures to demonstrate their commitment to closing those gaps. The measures they adopt come from other universities that have validated them as "best practices." Some of these practices are highly controversial, including the use of DEI commitment statements in faculty hiring or inclusion strategies that conflict with free and open debate. In an article for *The Chronicle of Higher Education* titled "How Accreditors Are Measuring Colleges' Diversity, Equity, and Inclusion Efforts," Eric Kelderman demonstrates how

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of the students they admit, and especially for the at-risk ones whose challenges they accept when they choose to admit them.[28]

Yet the accreditors' new DEI expectation changes the focus of the student success effort by moving race-consciousness and the goal of "closing equity gaps" to its center. One significant way it does so is by requiring

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28   Vincent Tinto, "When Access Is Not Enough," Carnegie Perspectives (Stanford, CA: The Carnegie Foundation for the Advancement of Teaching, 2008), https://files.eric.ed.gov/fulltext/ED502271.pdf.

29   Next Generation Assessment, "NGA Web Bites: Perspective of the Northwest Commission on Colleges and Universities (NWCCU) on DEI," https://www.youtube.com/watch?v=opoSeTcaeXI.

far at least one accreditor is willing to go. California Lutheran University's accreditor's (WSCUC) actions led the institution to change its cabinet-level leadership, organizational structure, strategic plan, pedagogical practices, faculty composition, faculty retention focus, faculty and staff hiring practices, student life, and "policies and processes that hold individuals on campus accountable for inappropriate behavior." The institution also "changed its curriculum and promotion and tenure processes to ensure all faculty members are committed to DEIJ [Diversity, Equity, Inclusion, and Justice]."[30]

Yet expecting that institutions commit to the success of all students they admit need not require them to adopt race-consciousness or to organize their efforts around closing so-called equity gaps. A better approach focuses on all students whose lives have not provided them with the level of support necessary to perform well in college.[31] Another approach highlights an institution's relative success with riskier student populations through "risk-adjusted metrics" that take into account the background characteristics of the student population they serve.[32] Such approaches are more inclusive than the DEI approach because they focus institutions on *all* underprepared and at-risk students, not just those whose improvement is required to close reputed equity gaps.

> ## DEI has disfigured the logic of accreditation into "*we will tell you what you're trying to accomplish, how you should evaluate student success, and how many students actually succeed.*"

Unfortunately for Christian colleges and universities, experience indicates that these latter two options are unlikely to satisfy accreditors' new DEI expectation. Instead, the accreditors are bent on requiring disaggregated data and the closing of racial and ethnic equity gaps as the bedrock of an all-pervasive implementation of DEI initiatives on campuses. All of this is, of course, backed by the threat of losing Title IV financial aid. Institutional autonomy won't hold up very long under such pressure. DEI has disfigured the logic of accreditation into "*we will tell you what you're trying to accomplish, how you should evaluate student success, and how many students actually succeed.*"

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30   Eric Kelderman, "How Accreditors Are Measuring Colleges' Diversity, Equity, and Inclusion Efforts," *The Chronicle of Higher Education*, April 3, 2023, 3-23, esp. 6 and 13, https://www.chronicle.com/article/the-new-accountability.

31   Over the past two decades, hundreds of colleges and universities have used the National Survey of Student Engagement (NSEE) to guide their student success initiatives and focused on students' lack of preparation rather than race or ethnicity. For background on NSSE, see https://nsse.indiana.edu/nsse/index.html.

32   Diane Auer Jones, "Why Accreditors Can't and Shouldn't Adopt the Consumer Reports Methodology," *The Future of Accreditation: The CHEA Opinion Series*, no. 12 (Washington, DC: CHEA International Quality Group, October 2017), https://www.chea.org/sites/default/files/pdf/op-ed-jones-2017_0.pdf.

The Third Threat:
The Consumer Protection Reform Movement

As previously noted, since the first student loan crisis in the early 1990s, criticism of the accreditors has been unrelenting. Questioning of their fitness as stewards of over $120 billion in federal financial aid often intensifies during periods when government action seems possible or imminent. Today is one of those moments. On the heels of successfully dismantling the for-profit higher education sector, the Progressive wing of the Democratic party is extending its reform agenda to the nonprofit side.[33] While not embracing this entire agenda, Republicans often find common cause in demanding greater accountability for employment outcomes from colleges and universities.[34]

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33   Katherine Knott, "U.S. Focused on Consumer Protection, Accountability in Rules Overhaul," *Inside Higher Ed,* January 5, 2024, https://www.insidehighered.com/news/government/student-aid-policy/2024/01/05/education-dept-focuses-consumer-protection-rule.

34   Katherine Knott, "Republicans Focus on Accountability and Affordability in Higher Education Overhaul," *Inside Higher Ed*, January 25, 2024, https://www.insidehighered.com/news/government/2024/01/25/gop-targets-affordability-accountability-higher-ed-bill; Andrew Gillen, "Which College Accreditors Are Failing Students?," Texas Public Policy Foundation, September 2022, https://www.texaspolicy.com/wp-content/uploads/2022/09/2022-09-RR-NGT-Which-College-Accreditors-are-Failing-Students%E2%80%93Gillen.pdf; Beth Akers, "The Case for a Student-Focused System of Accountability in Higher Education," *Manhattan Institute,* January 20, 2017, https://manhattan.institute/article/the-case-for-a-student-focused-system-of-accountability-in-higher-ed; Preston Cooper, "How to Hold Colleges and Universities Accountable for Prices and Outcomes," *Medium,* March 31, 2022, https://freopp.org/improving-return-on-investment-in-higher-education-principles-for-reform-e6ed38c50ae5.

Such efforts, however, are likely to vastly expand the role of the U.S. Department of Education and lead to a highly uncertain future for Christian colleges and universities.

It is hard to overstate the growing momentum of higher education reform within the Progressive wing of the Democratic party. This effort crystalized in the middle years of President Obama's first term and centered on the poor outcomes and exploitative practices of for-profit universities.[35] Within a decade, it succeeded in bankrupting multiple giant for-profits (e.g., Corinthian,[36] ITT[37]) and compelling others to sell themselves to nonprofit partners (e.g., EDMC,[38] Kaplan,[39] Grantham,[40] Ashford,[41] the University of Phoenix[42]). Once the darling of investors, for-profit higher education is headed towards extinction under the weight of new regulations that punish institutions for misleading advertising, predatory recruiting, and misuse of federal funds. This effort was waged in the name of consumer

On the heels of successfully dismantling the for-profit higher education sector, the Progressive wing of the Democratic party is extending its reform agenda to the nonprofit side.

protection—that is, the protection of students against the for-profit colleges and universities that professed to serve them.

Some worried at the time that reformers would soon turn their attention to the nonprofit higher education sector. It did not take long. President Obama began to advance broader higher education and accreditation reforms in his second term, and President Biden's Department of Education has picked up where he left off. Consumer protection is now the central principle of a range of reforms designed to put teeth back

35   Allie Grasgreen, "Obama Pushes For-Profit Colleges to the Brink," *Politico*, July 1, 2015, https://www.politico.com/story/2015/07/barack-obama-pushes-for-profit-colleges-to-the-brink-119613.

36   Michael Stratford, "Corinthian Dismantling Continues," *Inside Higher Ed*, April 14, 2015, https://www.insidehighered.com/news/2015/04/15/us-fines-corinthian-colleges-30-million-and-effectively-closes-heald-chain.

37   "The End for ITT Tech," *Inside Higher Ed*, September 6, 2016, https://www.insidehighered.com/news/2016/09/07/itt-tech-shuts-down-all-campuses.

38   Ashley A. Smith, "New Nonprofit Owner for EDMC," *Inside Higher Ed*, March 5, 2017, https://www.insidehighered.com/news/2017/03/06/large-profit-chain-edmc-be-bought-dream-center-missionary-group.

39   Douglas Belkin and Melissa Korn, "Purdue University to Acquire Kaplan University," *Wall Street Journal*, April 27, 2017, https://www.wsj.com/articles/purdue-university-to-acquire-kaplan-university-1493304763.

40   Emma Whitford, "Arkansas to Expand Online with Grantham Acquisition," *Inside Higher Ed*, August 10, 2021, https://www.insidehighered.com/news/2021/08/11/u-arkansas-system-plans-acquire-online-grantham-university.

41   Lindsay McKenzie, "Unpacking the Arizona–Ashford Deal," *Inside Higher Ed*, September 14, 2020, https://www.insidehighered.com/news/2020/09/15/unpacking-university-arizona%E2%80%99s-deal-ashford.

42   Doug Lederman, "University of Phoenix to Affiliate with University of Idaho," *Inside Higher Ed,* May 17, 2023, https://www.insidehighered.com/news/institutions/profit-colleges/2023/05/17/university-phoenix-affiliate-university-idaho.

"student achievement" standard. To bring this about, the Department launched a negotiated rule-making session in January 2024 with the goal of having new rules fully approved before the November elections.[47]

A major key to the success of the consumer protection policy agenda is its narrowed definition of quality within higher education. To the accreditors' disappointment, their intricate student learning outcomes model is completely ignored in this framework.

A major key to the success of the consumer protection policy agenda is its narrowed definition of quality within higher education.

Instead, reformers look to more easily understood institutional "bright line" metrics like retention, graduation, and federal loan repayment rates. Ultimately, however, those committed to reform are headed toward evaluating programs in terms of their job placement record. Their narrative is that government needs to protect students

into state regulation of higher education,[43] to sharply limit college partnerships with for-profit entities,[44] to forgive student financial aid debts,[45] and to expose college programs with poor employment outcomes.[46] For accreditors, the consumer protection agenda means greater Department oversight and the introduction of an enforceable

43   Knott, "U.S. Focused on Consumer Protection, Accountability in Rules Overhaul."

44   U.S. Department of Education, "Dear Colleague Letter: Requirements and Responsibilities for Third-Party Servicers and Institutions," February 15, 2023, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2023-02-15/requirements-and-responsibilities-third-party-servicers-and-institutions-updated-may-16-2023. This sweeping Dear Colleague Letter was later rescinded after an unprecedented outcry from colleges, universities, and higher education firms. The Department is expected to revise its new rules without abandoning its intent to heavily police institutions' work with *all* third parties. In the meantime, one accreditor has picked up this mantle and instituted stricter requirements. Natalie Schwartz, "Middle States Plans for 'Intense Scrutiny' of Outsourced Marketing and Recruiting," *Higher Ed Dive,* October 5, 2023, https://www.highereddive.com/news/middle-states-accreditor-policies-opms/695807/.

45   Adam Minsky, "Student Loan Forgiveness Could Begin This Week Under New Biden Plan," *Forbes,* January 29, 2024, https://www.forbes.com/sites/adamminsky/2024/01/29/student-loan-forgiveness-could-begin-this-week-under-new-biden-plan/.

46   Knott, "U.S. Focused on Consumer Protection, Accountability in Rules Overhaul."

47   Natalie Schwartz, "Education Department Presses Forward with Review of Accreditation and Distance Ed Rules," *Higher Ed Dive*, November 28, 2023, https://www.highereddive.com/news/education-department-regulations-negotiated-rulemaking/700928/.

against malicious universities, most of whose programs lead not to good jobs but to worthless diplomas and crippling student debt.

What new rules the Biden Department of Education will impose on accreditors, and what accreditation will look like in the future, remains to be seen. We will know more in the coming months. But some clues are now evident. For some time, Democrats and Republicans have been interested in extending federal student financial aid to non-degree "short-term" programs (e.g., "short-term Pell"), and recently a bipartisan bill emerged in the House of Representatives to bring this about.[48] The bill is a rare instance of consensus in today's polarized environment, and it is instructive in two ways. First, it breaks with nearly all of the history of federal student financial aid, which limited this aid to *accredited degree programs*, or in other words, to what colleges and universities do. Second, it proposes an alternative gateway to this aid and an alternative means for determining program quality. Leaving current accreditors out of the mix, it distributes responsibility to the Department of Education, state governments, and *new* accreditors.

The direction in which we are headed is further indicated by one of these new accreditors. Headlined by President Obama's Assistant Secretary of Education Ted Mitchell, the *Postsecondary Commission* (PSC) reduces institutional and program quality to a mathematically sophisticated statistical "value-added earnings" (VAE) metric.[49] VAE establishes earnings thresholds that take

The fast-emerging primacy of safeguarding students against university programs with poor job outcomes points to even bigger challenges for colleges and accreditors. At stake is the standing of degrees themselves.

into consideration both cost of attendance and opportunity costs of other pathways. In the latter regard, under the PSC model, accredited colleges and universities would be required to prove that their programs lead to "median actual annual earnings at least equal to 150% of the federal poverty level for a single person.[50] In building its model, PSC is working with the Texas State Technical

48   Jeremy Bauer-Wolf, "Short-term Pell Bill Advances out of House Committee," *Higher Ed Dive*, December 12, 2023, https://www.highereddive.com/news/short-term-pell-bill-advances-out-of-house-education-committee/702349/; Alison Griffin and Noah Sudow, "Workforce Pell: Political Compromise Still Exists!" *Whiteboard Advisors* (blog) https://whiteboardadvisors.com/workforce-short-term-pell-grants-legislation-update/.

49   Postsecondary Commission (PSC), *Overview*, https://postsecondarycommission.org/overview/.

50   Postsecondary Commission (PSC), *Accreditation Standards*, https://drive.google.com/file/d/1fapcq25zHFJJvB8R6FEJM4vzfKEOr9mU/view, 9.

> **While the new architecture of consumer protection, short-term Pell, value-added earnings metrics, and skills-based hiring is pitched as reform, it is, in fact, the displacement of an old order by a new one.**

College, which is one of very few institutions in the United States whose government funding is tied to the earnings of its graduates.[51]

The fast-emerging primacy of safeguarding students against university programs with poor job outcomes points to even bigger challenges for colleges and accreditors. At stake is the standing of degrees themselves. "Worthless degrees" have become a political football,[52] and the term is now an effective weapon in the hands of the "skills-based hiring" movement.[53] Championed by leading technology companies like LinkedIn and Google, this movement takes aim at the "lazy" and "inequitable" human resources practice of sifting job applicants by degrees, demands the removal of degree requirements from job descriptions, and seeks to base all hiring on skill attainment.[54] State governments in blue (Maryland) and red (Texas) states have joined the movement, and more join every month.[55]

Even college and university presidents now sing from the *skills* hymnal, apparently unaware they are in the accredited degrees business.[56] Yet it's hard to envision colleges and universities successfully retooling around skills even if the skills-based hiring movement succeeds in significantly devaluing degrees.[57] It's even harder to imagine current accreditors retooling around non-degree skills-based programs. After all, they are not even authorized by the Department of Education to accredit such programs; they are limited to accrediting degree programs.[58]

51   Carol Rava, "PSC and Texas State Technical College Announce Partnership," *Postsecondary Commission,* December 1, 2023, https://postsecondarycommission.org/press-release-psc-texas-state-technical-college-announce-partnership/.

52   Jeff Merkley, Dick Durbin, and Raja Krishnamoorthi, "Protecting Students from Worthless Degrees Act," https://www.merkley.senate.gov/wp-content/uploads/imo/media/doc/protecting_students_from_worthless_degrees_bill_summary.pdf.

53   Amanda Claypool, "Your Resume Is Worthless—Skills-Based Hiring Is the Future of Work," *Medium,* January 29, 2024, https://amandaclaypool.medium.com/your-resume-is-worthless-skills-based-hiring-is-the-future-of-work-9d28174631e5; Susan Milligan and Lauren Camera, "Ditch the Degree? Many Employers Are Just Fine with That," *U.S. News and World Report*, February 3, 2023, https://www.usnews.com/news/the-report/articles/2023-02-03/ditch-the-degree-many-employers-are-just-fine-with-that.

54   Joe Lischwe, Alex Noether, Maria Gordian, Andrea D'Arcy, and Jon Barfield, "Eliminate a Degree of Difficulty: Hire for Skills, Not School," *Bain & Company* (brief), https://www.bain.com/insights/eliminate-a-degree-of-difficulty-hire-for-skills-not-school/; Ryan Craig, "The Rise of Skills-Based Hiring (And What's Stopping It)," *Forbes,* January 20, 2023, https://www.forbes.com/sites/ryancraig/2023/01/20/the-rise-of-skills-based-hiring-and-whats-stopping-it/.

55   Amanda Winters, "Governors Leading on Skills-Based Hiring to Open Opportunity Pathways," *National Governors Association*, June 1, 2023, https://www.nga.org/news/commentary/governors-leading-on-skills-based-hiring-to-open-opportunity-pathways/.

56   Doug Lederman, "Preaching to, and Challenging, the Liberal Arts Choir," *Inside Higher Ed,* January 9, 2023, https://www.insidehighered.com/news/2023/01/10/role-liberal-arts-era-skills-based-hiring.

57   Jessica Blake, "Interest in Skill-Based Learning Not Keeping Up with Demand," *Inside Higher Ed*, January 19, 2024, https://www.insidehighered.com/news/business/academic-programs/2024/01/19/skills-based-education-lots-interest-little-action.

58   "Regional Accrediting Organizations," *Council for Higher Education Accreditation*, https://www.chea.org/regional-accrediting-organizations-accreditor-type.

In sum, while the new architecture of consumer protection, short-term Pell, value-added earnings metrics, and skills-based hiring is pitched as reform, it is, in fact, the displacement of an old order by a new one. Defining this new order will be the U.S. Department of Education's role in protecting students against the actions and practices of the institutions that profess to serve them. Respecting the distinctive missions of Christian colleges and universities will be of secondary importance, if that. The new order's orientation towards command and control runs counter to the old one's roots in institutional autonomy and mission diversity.

The Opportunity:
A Marketplace of Current and New Accreditors

There is an alternative accreditation reform movement that is much more respectful of the distinctiveness of Christian colleges and universities. It targets the one-size-fits-all model of the regional accreditors, and unlike movements driven by consumer protection and DEI, it does not increase the power of accreditors over institutions or the U.S. Department of Education over accreditors. Instead, it seeks to restore balance to the accreditation system by fortifying institutional autonomy within it. One-size-fits-all refers to the use of a single set of standards for all institutions within a region, and it reflects the system's historic commitment to regionalism. On the surface, the case against one-size-fits-all seems obvious: should the Northeast accreditor (NECHE) use the same standards for both Harvard University and Bunker Hill Community College? The difficulty, however, is that uprooting one-size-fits-all requires challenging the geographic exclusivity of regional accreditors.

In 2020, the Department of Education acted to do just that after a negotiated rulemaking session that achieved a rare consensus on

The 2020 rules leveled the playing field. Moving forward, there are only "institutional accreditors." All are now compelled to compete.

a mix of new administrative rules.[59] Under these new rules, colleges and universities can choose their accreditors in a "marketplace" of existing options, but also of new ones that are encouraged to develop.[60] Along these lines, the Department sunset the use of the term "regional accreditor" to describe the seven associations that accredit most colleges and universities.[61] Though not based in any statute, this term was useful to distinguish these accreditors from others, like those who oversaw vocational colleges. But it also carried with it an unjustified, implicit ranking that diminished the contributions of these other accreditors.[62] The 2020 rules leveled the playing field. Moving forward, there are only "institutional accreditors." All are now compelled to compete.

In addition, the Department sought to supply institutions with more options, so that they were not overly beholden to a single agency. To accomplish this, their new rules help new accreditors form by de-risking institutions' initial reliance on them. The critical change was to allow institutions to work with *more than one* accreditor for a period of time before switching.[63] This change makes it possible for institutions to transition to new accreditors without putting their accreditation or, crucially, their access to federal financial aid, at risk. In creating this "second accreditor" strategy, the Department acted to lower the barriers of entry that had previously thwarted efforts to form new accreditors, like those of the American Academy for Liberal Education (AALE) in the 1990s and 2000s.[64]

Supported by the new rules, the accreditation marketplace is quickly taking shape. Florida and North Carolina gave it a boost when they acted to require public institutions in their states to switch from the widely criticized Southern (SACSCOC) accreditor within five years: Florida in 2022,[65] and

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59   Michael Brickman, *The State of Federal Accreditation Regulations and Guidance: Recent Reforms and New Opportunities*, Defense of Freedom Institute, March 7, 2023, 5-12, https://dfipolicy.org/wp-content/uploads/2023/03/Accreditation_Michael_Brickman-FNL-3.7.2023.pdf; Natalie Schwartz, "Ed Department Issues Final Rules on Accreditation and State Authorization."

60   Department of Education, "Student Assistance General Provisions," 84 FR 58834.

61   Ilana Hamilton, "What Accreditation Should a College Have? What to Know," *Forbes*, July 14, 2023, https://www.forbes.com/advisor/education/student-resources/college-accreditation/.

62   Anne Dennon, "What Is Institutional Accreditation? And Why Is It So Important?," *Accredited Schools Online*, https://www.accreditedschoolsonline.org/resources/institutional-accreditation/.

63   Department of Education, "Special Rules Regarding Institutional Accreditation or Preaccreditation," *Federal Register,* vol. 84, no. 212, November 1, 2019, section 600.11, 58916.

64   The biggest challenge for AALE (https://www.aale.org/) during the time it was recognized by the U.S. Department of Education (1996-2009) was identifying schools with whom to work. Finding that most institutions were wary of changing accreditors, AALE had to focus on new, struggling, and international institutions that were not as good a fit with its mission. The Transnational Association of Christian Colleges and Schools (https://www.tracs.org/) had a similar experience in standing up a new accreditor in the same time period.

65   Jeremy Bauer-Wolf, "Public Colleges Must Change Accreditors Every Five Years, Florida Bill Proposes," *Higher Ed Dive*, February 4, 2022, https://www.highereddive.com/news/public-colleges-must-change-accreditors-every-5-years-florida-bill-propose/618357/.

North Carolina in 2023.[66] New accreditors have also begun to emerge. As previously mentioned, the Postsecondary Commission has built an accreditor around a value-added earnings model and is well on its way to gaining recognition from the U.S. Department of Education.[67] AALE is in the process of developing an institutional option for liberal arts colleges,[68] and other accreditors, including the newly formed National Accreditation Commission,[69] are exploring a public university accreditor.

As suggested, the ultimate promise of the new marketplace is the development of new accreditors that are better because they serve only one type of institution. Imagine a scenario in which an institution can work with an accreditor that fully integrates the principles and best practices *of its type of institution* into its standards. For Christian colleges, this would mean working with an accreditor that answers not only the question of "What is a

> **Imagine a scenario in which an institution can work with an accreditor that fully integrates the principles and best practices *of its type of institution* into its standards.**

university?" but also the question of "What is a Christian college?" Its answer would be as much derived from Arthur Holmes' *The Idea of a Christian College* as from the U.S. Department of Education's accreditation checklist.[70] These kinds of specialized accreditors already exist; for example, the Association for Biblical Higher Education (ABHE) only accredits Bible colleges.[71] At the K-12 level, the Classical Education movement has birthed several new accreditors that only accredit "classical schools."[72]

66   Josh Moody, "North Carolina Forces Changes to Accreditation," *Inside Higher Ed*, October 10, 2023, https://www.insidehighered.com/news/governance/accreditation/2023/10/10/new-north-carolina-law-forces-changes-accreditation.

67   Goldie Blumenstyk, "The Edge: Can a College's Worthiness Be Judged by What Its Students Earn?," *The Chronicle of Higher Education*, December 13, 2023, https://www.chronicle.com/newsletter/the-edge/2023-12-13.

68   American Academy for Liberal Education, *Mission*, https://www.aale.org/mission-2/.

69   See https://nationalaccreditation.org/.

70   Arthur Holmes, *The Idea of a Christian College* (Grand Rapids: Wm. B. Eerdmans, 1975).

71   Association of Biblical Higher Education (ABHE), *Institutional Accreditation Standards*, https://www.abhe.org/wp-content/uploads/2023/12/Institutional-Accreditation-Standards.pdf.

72   Association of Classical Christian Schools (ACCS), *Accreditation*, https://classicalchristian.org/accreditation/; The Chesterton Schools Network, *Our Model of Education*, https://chestertonschoolsnetwork.org/about#our-model.

The Path Forward

The threats embedded in the accreditation environment described above require trustees of Christian colleges and universities to pay close attention to how accreditation requirements may encroach on their institutions' autonomy and mission. Trustees should be prepared to discuss these encroachments with institutional leadership and to work with them to develop a proactive and strategic response. They should also pay close attention to developments that may threaten their accreditation and put their students' access to federal financial aid at risk. Moving forward, trustees need to be vigilant in maintaining awareness of their institution's accreditation status and be ready to respond to threats as they arise.

The best opportunity for Christian colleges and universities to combat these threats is to indicate their willingness and ability to change accreditors. While this involves some risk and work, institutions should take advantage of what the new accreditation marketplace affords them. The new rules permit them to work with a second accreditor for five years, and this "second accreditor strategy" is the ultimate hedge against an overbearing accreditor. Switching accreditors is not yet common, but it will soon be. Three public universities in Florida, including the 70,000-student University

of Central Florida, are now in the process of changing from the Southern accreditor (SACSCOC) to the Midwestern one (HLC), and they will be followed by all the other Florida public universities as well as those in North Carolina.[73] All the accreditors save one have now shifted from a regional to a national focus of operations, and they are starting to compete.[74] States are acting to remove statutory mandates requiring their institutions to work with specific accreditors.[75] The marketplace has begun.

The best opportunity for Christian colleges and universities to combat these threats is to indicate their willingness and ability to change accreditors.

A willingness to change accreditors is also how Christian colleges and universities can incubate a new accreditor that can better support the unique missions of their institutions. The future of accreditation could be one in which new accreditors encourage each institutional type to achieve its full potential, from public research university to independent college, from community college to Christian college and university. Within this

marketplace, institutions would not have to pretend to be something they are not in order to participate in federal financial aid. Instead, respect for mission diversity and institutional autonomy would be reaffirmed as the very cornerstones of the accreditation system.

To be sure, these institutional-type accreditors would need to be responsive to the consumer protection reform movement and its demand for increased accountability, especially for employment outcomes. Despite its potential for harm, this movement is grounded in the common-sense requirement that institutions benefiting from the public's $120 billion investment in student aid be held accountable. Unfortunately, the enormity of this investment and the dependence of institutions upon it have created the leverage that is now being used to impose requirements like DEI on institutions. Unchecked, this leverage will drive institutions to a single standard and relegate mission diversity to an afterthought.

A better course can be charted through institutional-type accreditors that have an interest in brand protection. These accreditors should have high standards that make them exclusive. In this way, they should return to an earlier form of accreditation in which institutions banded together to defend their quality.[76] Moving forward, that definition of quality could thoughtfully include achieving respectable employment outcomes without

73   Josh Moody, "Florida's Accreditation Shuffle Begins," *Inside Higher Ed*, August 30, 2023, https://www.insidehighered.com/news/governance/accreditation/2023/08/30/flas-accreditation-shuffle-begins-one-college-gets-us.

74   Council of Higher Education Accreditors (CHEA), *Regional Accrediting Organization to Broaden Reach*, February 28, 2020, https://www.chea.org/regional-accrediting-organization-broaden-reach.

75   Adam Kissel, "Let Colleges Choose an Accreditor," *The James G. Martin Center for Academic Renewal*, February 3, 2023, https://www.jamesgmartin.center/2023/02/let-colleges-choose-an-accreditor/.

76   Gaston, *Higher Education Accreditation*, 18-19, 28.

With institutional diversity aligned to student diversity, each institution can strive to truly be "an Alma Mater, knowing her students one by one, not a foundry, or a mint, or a treadmill."

reducing quality exclusively or principally to these outcomes. Accreditors' interest in protecting the brand of their institutions could be supplemented by independent Title IV requirements ensuring students can pay back their student loans.[77]

The United States is an immense, pluralistic country, and the singular task of American higher education is to educate an astonishingly diverse set of students who matriculate with vast differences in background and preparation. These students are best served by a correspondingly diverse set of institutions that can awaken them intellectually by coming to know them well. All true education takes place when it meets objective standards of excellence while also speaking to students' felt needs and longings.[78] With institutional diversity aligned to student diversity, each

institution can strive to truly be "an Alma Mater, knowing her students one by one, not a foundry, or a mint, or a treadmill."[79] An accreditation system grounded in respect for mission diversity and institutional autonomy is the path to this outcome.[80] Christian colleges and universities contribute richly to our nation's postsecondary diversity and therefore are natural leaders of this movement. They can—and should—show the way. 🏛

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77   Lindsey M. Burke, Adam Kissel, Armand Alacbay, and Kyle Beltramini, "It's Time for Congress to Dismantle the Higher Education Accreditation Cartel," *Backgrounder* #3774, (Washington, DC: Heritage Foundation, June 20, 2023), 3, 5-6, https://report.heritage.org/bg3774.

78   Allan Bloom, *The Closing of the American Mind: How Higher Education Has Failed Democracy and Impoverished the Souls of Today's Students* (New York: Simon and Schuster, 1987), 19.

79   John Henry Newman, *The Idea of a University* (Binghamton: Vail-Ballou, 1996), 105.

80   U.S. Department of Education, *Rethinking Higher Education: Accreditation Reform*, December 2018, https://files.eric.ed.gov/fulltext/ED591007.pdf: "The aim of accreditation is not to ensure that all institutions accredited by a given agency are identical or that all students who attend those institutions reach for the same goals or achieve the same outcomes. Instead, accreditors ensure that students have access to qualified instructors, an adequate curriculum, and necessary support services to enable them to meet their personal, academic, intellectual, and career goals" (1).

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