The history of institutional accreditation and the standards of the National Council for Accreditation of Teacher Education (NCATE) are discussed. The societal and related economic and political reasons for the evolution of accreditation in its present form are addressed, since accreditation is related to prestige, political influences, consumer protection, and program and professional improvement. NCATE, a professional accrediting agency, is responsible for accrediting 550 of the total 1,367 state-approved teacher education programs. The 18 educational associations that support NCATE are listed. The key element of the teacher education accreditation process is NCATE's standards, which are outlined separately for undergraduate and graduate programs. The overall areas of evaluation are as follows: governance, curricula, faculty, student, resources and facilities, evaluation, program review, and planning. The accreditation process involves both the measurement of the institutional program and evaluation of the measurements based on the NCATE standards. Attention is also directed to the views of critics and proponents regarding NCATE accreditation. Finally, the question of universal accreditation is considered, since existing accrediting agencies are voluntary. (SW)
ACCREDITATION OF HIGHER EDUCATION:
THE CASE OF NCATE

by
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ACCREDITATION OF HIGHER EDUCATION: 
THE CASE OF NCATE

Introduction

Judging the quality of an institution of higher education according to minimum educational standards of excellence and awarding, or not awarding, a "seal of approval" based on this judgment has created a major educational issue in the last twenty-five years. The discussion of this issue--accreditation--is organized into six parts. First, a definition of accreditation and the attributed purposes of this form of control on higher educational institutions are offered as preparatory explanation of the issue. Second, a summary of accreditation activities illustrates the evolutionary stages of accrediting--a phenomenon of this century. Third, a brief introduction to and listing of the standards of NCATE (the National Council for Accreditation of Teacher Education) establishes the basic stated purposes of accreditation by using NCATE as a representative example. Fourth, the NCATE accreditation process is outlined. Fifth, the points advocated by critics and by proponents of NCATE accreditation are presented and discussed. Sixth, a new issue, the question of universal accreditation, which has risen from this basic accreditation debate, is briefly discussed as a concluding point for this paper and as an initiating point for future research.
Definition and Purposes of Accreditation

Accreditation has basically been a response by professional educators to the multiple criticisms of the schools and their teachers. As teacher education programs have received more directives for change and less financial assistance to effect these changes, the lessening of respect for the profession, combined with the decrease in resources provided, have led to more problems and more criticisms. The result is a greater need to "validate" the quality of the educational product. Accreditation is being used for this purpose.

A fundamental change of recent years which has led to this emphasis on ACCOUNTABILITY is the expansion of "postsecondary" education. Educational activities "post-high school graduation" have become so diverse that distinctions have had to be made which are basically judgments of quality as measured by service to the consumer. The excesses of many programs, both degree and nondegree, have created a fear that consumers of these educational opportunities are being "taken" in by misleading or untrue promises of educational outcome and future possibilities for employment or advancement. Accountability (demonstrating the performance stated in the institutional


objectives) is now a "condition of life in American Higher Educa-
tion."\(^3\) Accrediting agencies are acting as the regulatory bodies in
this movement to improve quality educational programs and to stimu-
late the improvement of the others.

The task most pressing for higher education has become the
public justification of education through the evaluation and mainte-
nance of qualitative and quantitative standards. The presumed
purpose of every educational institution has been to produce certain
results and assess these results to determine the outcomes of teach-
ing and learning.\(^4\) However, judging the consistency of these out-
comes with the stated institutional objectives requires some stand-
ards of measurement and some consistency in repeated applications of
these measures. Self-evaluation therefore becomes a continuous pro-
cess of measuring and monitoring individual institutional quality and
progress while accreditation becomes the occasional procedure of meas-
uring institutions by more formal means and making such knowledge
public.\(^5\) The institution either meets minimum standards of excellence
or it does not.

\(^3\)Edward R. Hines and David K. Wiles, "Commentary: The Pendu-
lum Dynamics of Accountability in Higher Education," College and Uni-

\(^4\)Robert G. Arns and William Poland, "Changing the University
Through Program Review," Journal of Higher Education 51 (May/June
1980):269; and Robert Kirkwood, "Institutional Responsibilities in

\(^5\)John Herbert, A Research Base for the Accreditation of
Teacher Preparation Programs (Bethesda, Maryland: ERIC Document Re-
Accreditation approval or denial may become public but the concept and process of accreditation are areas about which "few, people in teacher education know very much." Accreditation decisions may make the headlines but accreditation discussions rank low as a topic of interest to educators in general. The result is that not only have educators formed no consensus of what accreditation is and what it does, they just do not understand it.

Accreditation is "concerned with socially and educationally desirable ends, and with the wisdom of the academic community to define and promote those ends." Accreditation is essentially peer evaluation, self-regulation and a process intended to strengthen and sustain the quality and integrity of higher education by making it worthy of public confidence. Accreditation is therefore related to prestige, political "clout," consumer protection, and program and professional improvement.

Achieving accountability through accreditation involves satisfying the purposes attributed to accrediting. Many or few, these purposes have been listed by a number of educators and can be stated as a consensus as follows:

**Major Purposes of Accreditation**

Consumer Protection from marginal institutions and unqualified practitioners.

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Professional Advancement and Protection of legitimate institutions from the debasement of education.

Program Quality Maintenance and Improvement.

Certification and Reciprocity Base established by creation of and adherence to national minimum standards.

Statewide Planning, Coordinating and Governance of Higher Education Aid.

Federal Funds Eligibility Standards.

Basically, accredited status means an institution has met the standards established by the accrediting agency, which address these listed purposes.

Accrediting agencies in fact have a task greater than just the problem of validating standards. They must go beyond the determination of proof of adequate and appropriate resources to proof of adequate and appropriate results. They have to somehow determine if good teaching is going on and if qualitative goals are being achieved. The "evaluation of student achievement is the sine qua non of".


accreditation and because there is so little agreement about the "appropriate dimensions of quality" of student achievement such judgments are difficult. The determination of excellence of an educational institution therefore has both quantitative and qualitative dimensions—neither of which is easy to measure.

The role of accrediting agencies has become increasingly complex as the definition of accreditation and its purposes has evolved during this century. Determining what needs changed, how, and on what basis have become current subissues related to the larger issue of accreditation. Along with these determinations has come the question of the role of the institution and its responsibility in effecting this process.

The effectiveness of accrediting processes is strongly related to institutional commitment and integrity. Accreditation can affirm the value of the educational program but the institutional effort can be the "key to the success of the accreditation process." A total, constructive, creative, cooperative effort is needed to assure this success.

The development of this cooperative situation can best be shown in an historical context. Those societal and the related economic and political reasons for the evolution of accreditation in its present form are discussed in the next section.

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History of Accreditation

The fact that the legal authority for educational institutions lies in the individual states means that by virtue of their statutory responsibilities states are accrediting agencies. Because it is a state responsibility to ensure the quality of school programs, it is also their responsibility to ensure the quality of the educational practitioners through certification. This certification takes the process of evaluation full circle as again programs, this time of teacher preparation, are judged as to quality.

The Board of Regents of the University of the State of New York was the first to begin accrediting schools and programs in 1784 but most states did not start this process until after 1910. At that time most of them also limited their approval activities to teacher education programs, viewing the practitioner as the key to successful learning.

From 1910 to 1948 the Association of American Universities (AAU) "accredited" institutional programs and published lists of approved programs and institutions. The Office of Education also issued a list entitled "Accredited Higher Institutions" approximately every four years from 1917 to the 1950s when the federal government began to take a more active role in accreditation activities. Boyd, in his article on the development of accreditation, stated that he felt that


15 Ibid.
the initial lack of involvement of the federal government as an accrediting agent "prevented" the development in the 1950s and 1960s of "nationwide standardization" but that this lack of involvement did allow and "encourage institutional autonomy and facilitated curricular innovation." This articulation of state, federal and private accrediting interests continues as a major subissue of accreditation today.

National accreditation dates back to 1927 when the American Association of Teachers Colleges initiated voluntary accrediting review procedures. "Research on the description of teaching and on preparation programs also dates back at least to the Commonwealth Teacher Training Study" of 1927. These points show that early in this century efforts were being made, though they were erratically conducted and poorly recorded and evaluated, to develop a theoretical framework within which teaching and programs of preparation of teachers could be adequately evaluated.

Universities did not begin their period of rapid modern growth until after World War II. During the twenty-five years which followed the end of that conflict, these institutions became increasingly larger and more complex. This growth provided many new directions for education to follow and stimulated innovation and experimentation. Tied to this almost unchecked expansion was what was to become a full fledged fear by the 1960s—the lack of quality control.

16Ibid., p. 189.

The federal government attempted to become more involved in the quality control of education, though in an indirect way, with the establishment in 1949 of the National Commission on Accrediting. Its responsibilities included restricting the number and improving the standards and procedures of the professional accrediting agencies.\textsuperscript{18} This action involved the spending of money by the government for "special purposes" because education is a legal function of the states. The federal government eventually expanded its role in the control of educational services in this way.

The Servicemen's Readjustment Act of 1944 and the Veteran's Readjustment Assistance Act (Korean War GI Bill) of 1952 were precedents for government involvement in the determination of eligibility of institutions to participate in federal programs and receive federal funding.\textsuperscript{19} The 1952 Act gave the U.S. Commissioner the authority to grant "formal federal recognition to accrediting agencies through the publishing of a list of recognized agencies."\textsuperscript{20} Nongovernmental accreditation agencies began to play an increasingly important role in American Higher Education—one made especially unique due to its existence outside the jurisdiction of the federal government.

A "federal connection" between private accrediting agencies and state and federal governments was established with the events of the 1950s but it was not until the tremendous growth in the college

\textsuperscript{18}Boyd, "Development," p. 190.

\textsuperscript{19}Pfnister, "First," p. 229.

population of the 1960s that the government would again move to increase its influence in higher education. During the 1960s enrollments in colleges and universities tripled. The number of marginal institutions grew as well as traditional and "nontraditional" forms of postsecondary education. The academic community, the states, and the federal government became greatly concerned about the quality of education.21

In 1965 the Higher Education Act was passed and the Office of Education, as a part of this act, began to compile its own list of institutions eligible to participate in Federal programs. In 1967 the commissioner established the Advisory Committee on Accreditation and Institutional Eligibility and gave it a policy-development function and responsibility for achieving compliance with federal policy by accrediting nongovernmental agencies.22 This group is now the DEAE.

The fear that programs outside the control of institutions of higher education would become a primary source of school personnel was a factor in the decision to effect a means of control through accreditation by governmental sanction of particular accrediting agencies and particular educational institutions.23 The surplus of teacher education students in the late sixties and early seventies reinforced this

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move as job future became more closely tied to graduation from an accredited institution.

Among the major groups that formed in this post-war period or that gained strong leadership positions were NCATE, AACTE (American Association of Colleges for Teacher Education), NASDTEC (National Association of State Directors of Teacher Education and Certification), FRACHE (Federation of Regional Accrediting Commissions in Higher Education), and the NCA and NEA. These diverse groups were to come to work more closely together through cooperative efforts and, in the case of FRACHE and the NCA, consolidation of purpose.

COPA (the Council on Postsecondary Education) was created in 1975 by the merger of FRACHE and the NCA and became a national organization with the responsibility for "continuing the articulation of the purposes and practices of accreditation." This articulation would become a major coordinating effort of state, federal and private accrediting agencies by COPA.

COPA assumed the role of assisting a large number of accrediting bodies in cooperative efforts which made for more efficiency in national accreditation. COPA has thirteen regional accrediting bodies and thirty-nine professional accrediting bodies within its influence.

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Such an umbrella function has obvious strength in numbers but weakness in diversity.

Nongovernmental accrediting agencies such as those within the domain of COPA are of the two kinds mentioned—regional and professional (also called institutional and specialized, respectively). Both types are voluntary bodies and are financed and run by their member institutions or professional organizations. The distinctions between the two are simple to understand.

Regional accrediting agencies focus their evaluation efforts on the college or university as a whole, on basic institutional soundness. They look at the major categories which follow: objectives, program, financial resources, faculty, and library facilities. There are six regional accrediting areas listed as follow: New England, Middle States, North Central, Northwest, Western, and Southern.27

Professional accrediting agencies primarily focus on interests outside the institution—in particular on the requirements or standards of the profession and only secondarily look at those parts of the institution which contribute to the quality of the professional programs. Medicine was the first area to have professional accreditation in 1907. Teacher education began to be professionally accredited in 1927.28


NCATE is an example of a professional accrediting agency and was founded in 1954. It is one of the largest national forums in teacher education. NCATE is responsible for the national accreditation of college and university programs for the preparation of "all teachers and other professional school personnel at the elementary and secondary levels." COPA has authorized NCATE to adopt standards and procedures for accreditation and to determine accreditation status. This agency which grants "seals of approval" to institutions with acceptable teacher education programs has a similar stamp of approval from the federal government.

NCATE is responsible for accrediting 550 of the total 1,367 state-approved teacher education programs. Though this number represents less than half of the total number of teacher preparation programs, NCATE is proven more significant in impact by the fact that 80 percent to 87 percent (estimates vary) of the nation's school personnel come from NCATE accredited programs.

NCATE is supported by the eighteen educational associations listed as follow:

CONSTITUENT MEMBERS
by Category of Classification

- American Association of Colleges for Teacher Education (AACTE)


31 Ibid., p. 2; and Hermanowicz, "Status," p. 33.
- National Education Association (NEA)
- Specialized Organizations
  - Council for Exceptional Children (CEC)
  - National Association of School Psychologists (NASP)
  - National Council of Teachers of Mathematics (NCTM)
- School Administration Organizations
  - American Association of School Administrators (AASA)
  - Council of Chief State School Officers (CCSSO)
  - National Association of State Directors of Teacher Education and Certification (NASDTEC)
- Public/Consumer Organizations
  - National School Boards Association (NSBA)
  - Student National Education Association (SNFA)

ASSOCIATE MEMBERS

- Association for Educational Communication and Technology (AECT)
- Association of Teacher Educators (ATE)
- National Council for the Social Studies (NCSS)
- American Personnel and Guidance Association (APGA)

*This month (October 1980) the NCATE Coordinating Board will select one additional constituent member and four additional associate members from over a dozen applicants.*

One-third of the membership of NCATE's committees and teams is made up of representatives of AACTE, one-third from NEA, and one-third from specialized council member organizations. Individuals serving as members of NCATE evaluation teams must be nominated by one of the council organizations and must have completed an official NCATE on-site training session. Most of NCATE's activities are handled by volunteers. Members of its Evaluation Council, Board, and various other committees and visiting teams all donate their services. The paid staff of NCATE consists of a Director (Lyn Gubser, appointed July 1978),

Associate Director, and Assistant Director, all of whom are full-time professionals, and a few office staff.\textsuperscript{33} It is a lean operation compared to most governmental, and even educational, bureaucratic organizations.

NCATE's governance is conducted through its Council and Coordinating Board. The Accreditation Council of NCATE is the "legislative, executive, and judicial branches all rolled into one" said Alan Tom\textsuperscript{34} but in fact the Coordinating Board was established as a type of governing board for the Council.\textsuperscript{35}

The Council performs the functions directly involved in the accreditation process and standards. It seats thirty people, from constituent (voting) to associate (nonvoting) members, and has two representatives from the general public. The Council has five major categories of responsibility as follow:

1. Standards—development and adoption of new and/or revised standards
2. Policies and Procedures—development and adoption
3. Feedback—allow for recommended changes by appropriate groups and members
4. Accreditation—make decisions
5. Advertisement—annual list\textsuperscript{36}


\textsuperscript{34}Tom, "NCATE," p. 115.

\textsuperscript{35}Hermanowicz, "Status," p. 36; and Olsen, "Kicking," p. 6.

\textsuperscript{36}Olsen, "Kicking," p. 7.
The Coordinating Board deals with the nonaccreditation matters of NCATE. It is constituted of twenty-four representatives from constituent members. The Coordinating Board establishes general policies, reviews Council policies and procedures, approves the Council's operating budget, handles the financial support of NCATE, ratifies proposed changes in the constitution, and approves new associate and constituent members. 37

The Evaluation Boards (or Auditing Committees) each consist of three to eight members plus a chairman. Their main functions are to review the institutional self-study and visiting team reports, to conduct hearings at which the institutional and team representatives are present and to make recommendations to the Council relative to accreditation. 38 One option institutions now have is to delete the Evaluation Board step and go directly to the Council, where the evaluation will be made. This could represent both a savings in cost (minimum $36,000) and in time (reports could come out six months earlier) and, in addition, an avoidance of another layer of interpretation between the institution and the Council. 39

The Council and the Coordinating Board work cooperatively to achieve NCATE's goals as efficiently as possible. One of the highest of these goals is the concern for keeping the standards current and relevant.

37 Ibid, p. 6; and Hermanowicz, "Status," p. 36.


In 1970, NCATE adopted new standards and in 1971 showed that it truly was continuing its commitment to constant review and revision. In the 1971 analysis of the reports of the evaluating teams, the six greatest weaknesses were identified. These areas of weakness were similar in both undergraduate and graduate programs and are rank ordered by the Evaluation Boards as follows:

- Evaluation of graduates
- Use of evaluation results from laboratory/clinical experiences
- Materials and IMC Centers
- Design of curricula
- Control of basic programs
- Conditions of faculty service

Since this evaluation, NCATE has adopted two major goals. One has been initiated with the revision of the standards and their adoption in May 1977 (they were effective in January 1979) and the achievement of the other goal is also underway--improvement in the accreditation process. This second point will be discussed in more detail in the fourth section of this work.

The third section of this paper deals with the NCATE Standards. This is a major area of importance in the accreditation process. It is the initial and most difficult and complex step to complete with precision and adequacy. Many criticisms of the NCATE Standards have been lodged but these points will be discussed later. The standards

40 Fritschel, "Weaknesses," pp. 206-207.
are discussed only briefly because they are numerous and complex and require intensive individual examination. The major categories only will be reviewed.

**NCATE Standards**

The "key element of the teacher education accreditation process is the standards developed by NCATE." Standards exist as a part of all accrediting operations but for NCATE they truly are "the testing items" of that accrediting agency. NCATE's standards are not just rhetoric, they are the focus of the accrediting process. To be accredited by NCATE means the standards have been met.

In 1977 the NCATE standards were revised and categories expanded to make the accreditation process more efficient by cutting down on the "too broad" areas of evaluation. The result is shown by the Standards "Contents" in Table 1. To evaluate the undergraduate and graduate programs, two sets of standards are outlined which contain six divisions or "families" of standards each. Standards are listed and numbered within these divisions and explained in full in the preamble and text of each.

The development and use of these standards has rested on the idea that "conceptualization, implementation and follow-up constitute

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42 Tom, "NCATE," p. 113.


44 Tom, "NCATE," p. 113.

### TABLE 1

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the dimensions of programs in teacher education." At least, these are the dimensions on which NCATE feels it should concentrate its evaluation efforts. These three areas can be seen to be covered by the six major divisions of the standards.

Though there are a few changes in the 1970 standards which can be considered major, the majority of the changes are minor. They consist mostly of attempts to clarify the standards and provide more precise definitions. Those changes considered major are listed as follow:

- Emphasis on multicultural education
- Increased emphasis on governance
- Increased emphasis on the specificity of objectives
- Clearer definitions of qualifications of college supervisors and public school cooperating teachers involved in the practicum
- Addition of a standard dealing with faculty development
- Elimination of the residency requirement for the M.A.
- Change in emphasis on the criteria for admission to and retention in teacher education programs
- Clarification of "product" evaluation and "program" evaluation

The emphasis of the times can be felt in these standards and, when compared with the older "criteria" of NCATE, it was clear in this research that the new standards reflect the stronger drive by NCATE to raise the quality of teacher education programs.

The standards are at times rather difficult to understand because the diversity of the institutional programs being evaluated

47 Hermanowicz, "Status," p. 35.
48 Fritschel, "Implications," p. 12.
49 Ibid., pp. 9-12.
do not allow for great specificity in the objectives. To aid the institutions in understanding and correctly interpreting these evaluative criteria, examples of questions which might be asked by visiting team members are included in a third section of the Standards. ⁵₀

This first step—establishing standards—in the accrediting process is followed by a second step which also directly involves the standards. The institution seeking accreditation (or reaccreditation) prepares a "self-study" which is the institution's measurement of its performance against that stated in the standards as required for accreditation. The third step is that in which the accrediting process "gets under way." The third step is the team visit, which will be discussed in more detail along with the final steps of the accrediting process in the next section.

NCATE Evaluation Process

The accreditation process involves both measurement of the institutional program and evaluation of the measurements based on the NCATE standards. The steps in this process will be listed separately in the next few pages. ⁵₁ Explanatory remarks or comments related to the step will follow each.

A program of teacher education which is seeking accredited status takes the following initiating step:

⁵₀NCATE, Standards.

⁵₁The detailing of these steps was obtained from Olsen, "Kicking."
1. The institution requests that its teacher education program be considered for initial accreditation or, if the period of present accreditation is near an end, reaccreditation.

2. After receiving the necessary materials and instructions from the NCATE Office, the institution conducts its self-study and prepares its Institutional Report. The IR is developed around the NCATE Standards. The self-study usually starts about 18 months before the on-campus visit by the NCATE Visiting Team.

The self-study is a very important step in the accreditation process. It is also one which can have great value to the institution. Properly conducted (the use of "local talent" is suggested rather than the use of consultants) the self-study is a chance for the institution to make sure that it is fully prepared for the team visit. It is insurance that the function of the accrediting process will not be left to the "whim" of the visiting team—or to chance.52

After notification of NCATE that the self-study is completed:

3. The dates of the visit are set. Fall visits usually occur between October 15 and December 1; spring visits are scheduled between January 15 and April 15.

4. The Institutional Report is due in the hands of the Visiting Team and the Council 60 days before the on-campus visit.

5. Some 30 days before the visit, the person chairing the Visiting Team visits the campus to (a) check on the adequacy of the Institutional Report and availability of needed supporting data and persons and (b) make preparations for the Team visit.

6. The Visiting Team, usually consisting of six to fifteen members depending on the size of the institution and the number of programs to be evaluated, is on campus for three days. During that period the Team validates the Institutional Report and assesses the strengths and weaknesses of the various programs through interviews.

and through examination of records and other data. The Team prepares a Team Report that sets forth a summary of strengths and weaknesses related to each Standard and the degree to which each one is met. The Team Report is prepared before the Team leaves the Campus.

A major task of the team is three-fold and is to validate the institutional report, to list the sources of information used by the team to validate the report, and to list the institution's strengths and weaknesses as noted above.53

7. Within 21 days following the visit, the Chair of the Visiting Team edits the final Team Report and sends copies to the NCATE Office, which in turn forwards copies to the institution.

8. The institution has another 21 days to prepare an Institutional Response to the Team Report. This gives the institution an opportunity to note in writing any inaccuracies, misleading statements, or other inadequacies in the TR and make any corrections it wishes.

9. Copies of the Institutional Report, the Team Report, and the Institutional Response are sent to the Council for consideration at its next meeting. Early in the Council meeting, an Audit Committee (Evaluation Board) made up of three Council members audits the Team Report and the Institutional Response. The Institutional Report also is available, if needed. Using these documents the Audit Committee assesses the strengths and weaknesses of the institutional program based upon the Standards and then prepares a recommendation to accredit or deny accreditation. The Council makes the final decision relative to accreditation. The options are: accreditation for seven years or denial of accreditation. There is no provisional, show-cause, or probationary accreditation option.

10. If accreditation is denied, the institution may:
   a. Accept the decision, or
   b. Within 15 days notify the Director of NCATE of its intention to appeal the decision. An appeal can be made on the grounds that NCATE Standards were disregarded, stated procedures were not followed, or evidence available to the Visiting Team and subsequent evaluation bodies was not considered.

The institution has another 30 days within which to submit in writing the specifics of its appeal, including full documentation.

One problem cited by Alan Tom is that an institution may not appeal on the basis of the interpretation of the report by the Council.

This vests the Council with considerable autonomy in its decision making.54

11. The case is forwarded to an Appeals Board which holds a hearing and makes a judgment regarding the merits of each charge contained in the appeal. If the Board finds in favor of the institution, the Council must decide what follow-up action is appropriate. The Appeals Board, in finding for the institution, does not grant accreditation. If the Board denies the appeal, the decision to deny accreditation stands.

Accreditation used to follow a ten-year cycle but that norm was seriously questioned, especially by COPA and the time cycle for institutional review was reduced, starting in 1977.5 NCATE accreditation now follows a seven-year cycle. NCATE has also tried to "streamline" its accreditation process in order to reduce the amount of time (and $) expenditure for the agency and the institution.

NCATE's "mini" visits are a way to have sequential monitoring of interim accredibility. During the fifth year of the cycle the institution prepares an update of its earlier Institutional Report and a "mini" visit is made by a Team of two to four members, depending on the number of teacher education options offered by the institution.

Following the visit, the Team prepares a report to the Council and

54Ibid., p. 115; and Robert L. Jacobson, "3 of 7 Colleges to Appeal Denials of Teacher-Education Accreditation," The Chronicle of Higher Education 20 (July 14, 1980).

recommends either (1) extension of the current accreditation period to a total of five additional years before a full-scale visit is held or (2) the "macro" visit, based on a complete new Institutional Report, be conducted in the seventh year as previously scheduled. The latter recommendation must be based on weaknesses documented by the Team. The Council makes the accreditation decision.56

The question of fees is currently one subissue of NCATE accreditation undergoing restructuring. The major source of revenue for NCATE in the past was the fees paid by the institutions undergoing accreditation. NCATE in 1978 adopted the establishment of an annual fee to replace the one large lump-sum payment on each accreditation visits but the implementation of this program and the annual amount were not discussed in those articles used for this research.57

As discussed earlier, NCATE's role was originally largely developmental. It now appears to be much more regulatory. As Gubser points out, when the standards were described as "optimum conditions," the rate of denial was 10 percent. The rate of denial is now 31 percent. Reasons other than "regulatory standards" were mentioned by Gubser as contributes to this increase in rate of denial. Such reasons included the effects on institutions of enrollment declines, diminished fiscal support for teacher education, teacher surpluses, recession, fuel costs, and inflation.58 Gubser states all have led to

57Gallegos, "Call," p. 27; and Scannell, "Developments," p. 22.
58Gubser, "Director," p. 117.
the erosion of quality teacher education programs but he does not relate the more rule-oriented use of the standards to the rate of denial. This question remains unresolved for this research.

Criticisms of Accreditation and Responses

The criticisms of NCATE accreditation are numerous. Some critical points are valid and based on fact; many are myth. The point, however, of all such criticisms is that misconceptions are usually most numerous and, related to an issue such as accreditation, can damage a process of maintaining educational quality which has become most important to the educational future of our country.

As Petersen points out, most claims of faults in accreditation are based more on "personal biases, isolated incidents, or rumors of what happened," than on the objective and comprehensive examination of the accreditation operation. For example, Tom charges that the NCATE standards are a "mess" and he cites many reasons in support of this charge. However, his charges are countered by Gubser with the point that efforts are being made to improve the standards and the process of accreditation and that such efforts are laudable. This example provides an illustration of Petersen's point that, essentially, many persons overreact to a situation which might have obvious deficiencies but not so obvious strengths.


60 Tom, "NCATE," p. 113.

61 Gubser, "Director," p. 118.
Much of the controversy about NCATE seems to center about the question of accreditation and its association, if not relationship, with power and control. Specifically, does accreditation by NCATE have as its central purpose the maintenance of quality or the maintenance of the status quo in education? The fear of an external threat to the autonomy of institutions of higher education has been a concern since their beginnings.

Attacking the politics of accreditation has become very popular but frequently is done in a circuitous manner by critics of the accreditation agencies. The standards, the application of these evaluative measures, and the judgments of accreditability are the most targeted areas. These are factors on which "opponents" of NCATE focus; in addition to the governance by NCATE, its financial support base, and the administration of the agency and its evaluation efforts.62

Some educators would argue that a major concern in the accreditation of programs and institutions should be the process, that the way in which an institutional or program "review" is conducted is at least as important as why it is done."63 Many others believe that institutions have failed to use the accreditation process to its full potential. The point to be made clear here is that the criticisms are not centered on the basic issue of the politics of accreditation


and that myths created by such off-base claims can obscure the truth and obstruct the progress of evaluation--accreditation--efforts.

Despite this conclusion by this researcher, for the purposes of this paper a brief discussion of major criticisms of NCATE will follow. These criticisms were selected as major through the comparison of a number of articles. They are listed and will be discussed in the order which follows:

Essentiality of accreditation--voluntary?
Long, complicated standards--vague?
Team composition and values--reliable?
Flexibility of standards--"rubber standards"?
Lack of empirical or evidential research base--valid?
Contribution to program improvement--approval = improvement?
Accreditation approval--strict?
Context within which standards are applied--model or rule?
Lack of coordination of accreditation efforts--duplication?64

Hopefully, it will be made clear that many of these criticisms are not based on fact and that accrediting agencies such as NCATA are representative bodies of professional educators who are dedicated to institutional and program improvement in American higher education.

The concern for professional autonomy is expressed in the criticism of accreditation as voluntary involvement. The close ties with the government that many accrediting agencies have used as "public relations" or as advertisement of their worth have led to a negative association of accrediting agencies with a threat to institutional autonomy. Seen as an external political force, which can deny accreditation, therefore eligibility for federal funds, accrediting agencies can face very cold receptions from institutions with much to gain from the accrediting process—certainly, at least, from accreditation itself.

It cannot be denied, despite examples of institutions which function without "official" accreditation, that for many higher educational institutions the essentiality of accreditation makes it non-voluntary.65 The pressures on higher education are now so strong that, as Olsen says, regional accreditation "is about as voluntary as summoning a physician if you are struck with a heart attack or stopping at a red light on a highway."66 If accreditation means monetary gain for an institution, it is hard to believe that in these difficult economic times this point will be denied.

A point of criticism which is accepted by even NCATE's Director is that the standards are long and complicated and contain many undefined concepts. They are full of words with wide ranges of meanings and other "flaws" as pointed out by Tom.67

Tom cites as examples that there are twenty-four standards for basic programs and twenty-five for advanced programs. If you include the preamble (as intended by NCATE) as a part of the standards, says Tom, you have approximately 400 "expectations" to address as institutional concerns. He says this is why self-study reports and team reports are often so long and detailed; especially the former. Tom seems to indicate this is too great a task--especially when such numbers of "expectations" are combined with the lack of clarity in the standards.68

Tom's major criticism focused on the lack of operational definitions and guidance to apply the standards. The worry is in judgment of acceptable levels of standard achievement at the time of the institutional evaluation. Tom does not believe the standards are invalid but he neither perceives them as "good" nor the institution's role as one of "ability to conform" to the standards.69

Gubser, NCATE's director, agrees that the standards are too vague and general and can "impede attempts to judge program quality,"70 but he points out that NCATE is taking measures to correct this situation. A glossary of terminology employed in the standards is being developed to clarify the language; NCATE also conducts orientation sessions for individuals and institutions for the purpose of explaining the standards and the accrediting process; and NCATE's standards committee continually reviews the standards and seeks input regarding

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68Ibid., pp. 113-114.
69Ibid., pp. 113, 116.
their improvement. This is not enough, as Gubser points out, but is why NCATE is constantly looking at all its procedures and processes which use the standards.  

Gubser grants that this elaborate revision process is not a substitute for sound standards but that accreditation as performed by NCATE does represent the judgment of professionals. Peer evaluation is the essence of private accreditation and NCATE is a rather large representative body of professional educators who volunteer their time and efforts at this formidable task.

Almost all accrediting agencies have recently revised their standards (NCATE 1977, effective January 1979) but though continuing review and revision is a function of accrediting agencies, a problem for everyone concerned is the hidden standards behind these evaluation criteria. Many visiting teams end up establishing their own standards and adjusting to the professional goals and values of particular programs or institutions. This creates a problem in reliability.

NCATE team members are professionals in the field of education but, as we all do, have individual values which can come in conflict with NCATE and institutional values. Team member and team differences in evaluation are a problem. Some members fail to apply all the requirements in the standards or not all evaluate the same

71Gubser, "Director," p. 118.
72Petersen, "Profile," p. 305.
points, some judgments are quantitative rather than qualitative, some are inconsistent, and worse, some members are inappropriately influenced by the institution. Teams do not have a high rate of reliability because the reversal rate for second evaluations of the same evaluation case is 60 percent. These statements point to a problem for "peer evaluation," which will remain valid only as long as the individuals participating are reliable. Both NCATE and the institutions cooperating with it have a stake in improving this area of the accrediting process.

The flexibility of standards is also a concern. Despite criticisms of their vagueness, their unreliable application by some teams raises the question of an inability to coordinate the standards with the process of evaluating. Are NCATE standards applicable to all situations, to all levels of all the different types of educational institutions? Is this why they are labeled "rubber standards." Perhaps NCATE needs more "evolutionary" time in this case. The diversity of postsecondary institutions and NCATE's expanding role will probably not soon reduce the severity of this problem but in the dedication of the professionals in our profession may lie hope.

The problem of establishing the validity of the accrediting standards and process may help solve many of the problems faced by

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74 This information comes from the IRT study results reported by Watkins, "Report," p. 4.


NCATE and other accrediting agencies. There are no validity statements about the standards because there exists no empirical or sufficient evidential research base from which validity can be determined. This is a major reason why NCATE has not judged "quality" through its accreditation process; why it has not established a high to low differentiation of programs or institutions.78

The problem of validity is also the determination of what are minimum standards? The public is made to feel that accreditation is the endorsement that a university has met the minimum standards of "good education"79—a concept which may be even more difficult to define.

The criticism closely tied to the granting of an "endorsement" or "seal of approval" (as accreditation is perceived by many) is that approval is often automatically considered indicative of past improvement or future improvement ability. Accreditation is not an end process. The need for institutional and program improvement is ongoing.80 If the major goal of accreditation is to foster innovation and improvement then accrediting agencies will have to charge themselves with not allowing accreditation to become an end—especially not an end protective of the status quo.

Accreditation only as approval is not enough. An "approved" program may become one resistant to change. The purpose of

78Fritschel, "Implications," p. 12.
80Kirkwood, "Myths," p. 211.
accreditation is to stimulate improvement, which necessitates change, not to stifle innovation. This is why reaccreditation occurs. However, the differentiation of NCATE of initial and "re-" accreditation is not sufficient to make the academic community feel assured accreditation is not terminal endorsement.

The question, "Is the process of accrediting one which demands high standards of quality?" is raised when programs appear to be accredited despite deficiencies. Consumer protection is a key issue of accreditation and should be a benefit of the process. Accreditation means institutions meet certain standards but the "minimum" of minimum standards is not very reassuring. Failure to be accredited may seem ominous and may "spur some institutions to improve," but the academic quality of "minimally" approved in achieving minimal standard institutions is also a concern. Strictness of application of standards raises an even more intense issue.

Are standards models or rules? This question is becoming a focal point of recent criticisms of NCATE. Larson (he was Director of NCATE for fifteen years) raised this question and stated that a decision on this point must be made.

The problem for interpreters of NCATE standards (and even for NCATE team members) is whether the standards are serving the same...
function as that for which they were revised by AACTE in 1970. They were then conceived as "criteria," as tests, as models for action and comparison. The January 1979 standards are a continuation of this concept but some critics point out that the actions of the Council would seem to indicate the Council perceives the application of the standards as rules.

The important distinction between the two terms is the difference in the concepts of "rule" and "criterion." The first implies a strict measurement of the degree of adherence to the rule as a requirement for accreditation. The second implies the use of an example for comparison by which to determine characteristics expected to be demonstrated by an institution or program for approval by the accrediting team. Many critics consider the NCATE standards as general criteria with descriptors insufficient by which to measure program quality. This indication that the standards do not qualify as rules has important implications in light of both accreditation and denial of accreditation decisions. Should NCATE's accreditation function become principally regulatory or stimulatory? We must not confuse quantity control with quality control; distinctions of measurable program variables must be made clear.

84 Fritschel, "Implications," p. 9.
87 Hermanowicz, "Status," p. 35.
It is a complaint of many persons connected with higher education that NCATE emphasizes "form over substance." This point would seem to indicate that NCATE, despite its claims of qualitative measurement, is also quite concerned with the quantitative aspects of form. It was stated by Tom that "instead of stressing ... substantive concerns as skills and competencies, ... NCATE standards emphasize a variety of procedural characteristics of programs." The desire by NCATE to measure effective teaching as an outcome of effective preparation seems to lie in measuring procedural characteristics. Perhaps this is why the judgment of NCATE as applying its standards as rules has been made.

The potential regulatory function of accreditation has been a factor in the thrusting forward of NCATE as a future coordinating agency of the different types of accrediting agencies which function today. Adding to this thrust is the criticism that the accreditation efforts of these different agencies create a great deal of duplication—wasted effort and money. To make these efforts more cohesive and coherent, and to solve the problem of duplication, the recommendation of one universal set of standards administered by one national accrediting agency has been receiving more and more attention—and, of course, a great deal of criticism, pro and con.


89 Tom, "NCATE," p. 115.

Universal Accreditation

Eligibility for accreditation has created a complex issue. Because there is "no national system for the development of the education profession or even a coherent national community of teacher educators," accreditation has come to perform an important function. The problem is that administrators of federal programs "need reasonably equitable criteria for inclusion and exclusion, while American education prides itself on diversity and pluralism." This fact makes these institutions fairly resistant to external pressures in professional preparation programs for teachers.

Existing accrediting agencies are voluntary; therefore, they lack legal authority to require higher education institutions to become accredited. This voluntariness, although limiting, is "more compatible with the political heritage of this country than the centralized control exercised" in other nations. However, both internal and external pressures to increase their involvement are being felt by the federal and the state governments. Examples of these pressures are competency tests and requirements, tighter admission standards, more field-based training; internships, and qualification exams for certification. These pressures to overhaul teacher

91 Hermanowicz, "Status," p. 34.
93 Petersen, "Profile," p. 305.
training programs are causing federal and state governments to tighten their control over accreditation.

Colleges and universities are, naturally, resistant to such a basic threat to their autonomy. Unfortunately the higher education community cannot agree on tactics for resistance. Any attempt to lodge control of the teaching profession firmly within the profession itself--creating a "closed shop"--is feared for several reasons.95

The possibility that the teaching profession could achieve professional autonomy such as that of the AMA creates fears that teaching could become "an inner-directed profession" such as critics of the AMA point out. Also, the fears of the American people, says Pulliam, will never allow control over education by teachers because of the concern over the ideology of teachers and their influence on students. Pulliam believes the different values of different groups in the U.S. will prevent any universal definition of teacher qualifications. Other fears are that the political influence on the accreditation of teachers will "divorce the drive for professional autonomy from the work of accreditation" and reduce emphasis on the humane aspects of learning while increasing the "mechanical trappings of organization."96 The force for universal standards and accreditation may, due to circumstances, be one external to the profession.

95Pulliam, "Substance," pp. 496-497.
96Ibid., pp. 503-504.
A growing number of persons within the educational community and certainly in the state and federal governments are advocating greater coordination between private—regional and professional—accrediting agencies and the state and federal governments in the accrediting process. Establishing a "connection" between the three groups is advanced as being more cost effective and cutting down on the duplication of efforts of these groups. It is also put forward as a means by which to reduce institutional accreditation stress due to the sometimes multiple or overlapping accreditation visits.

Redefining the roles of state, federal, and private agencies in accreditation is believed to be a means by which to make accreditation more efficient. With the "explosion" of postsecondary forms of education in the 1970s, greater demands were placed on accrediting agencies. Institutional size, functional differentiation, and specialization caused the accrediting agencies' functions to expand. Interrelatedness of programs for the purpose of establishing broad definitions of quality and standards by which to measure this quality created terrific problems for accreditation. The scope of the problem has led to considerations of creating new roles with more balanced responsibility for private, state, and federal accrediting groups.

Consumer protection is the source of the accountability movement which has, in turn, affected the role of private accrediting agencies. Government intervention has become a pattern since the


1960s in various aspects of this movement—particularly educational.\(^9^9\) Though a debatable role, federal government involvement in education (viewed as intrusion by many) has yet to be documented as an unhealthy relationship.\(^1^0^0\)

Universal compulsory accreditation would have to function as a cooperative enterprise and fully involve all constituents of the educational institution, including governmental agents, says Proffit. Such a task would require the work of federal, state, and private accrediting agencies (despite the different focus, tradition and justification of role of each) together because each alone would not "cover the mission of the total system" which would be created.\(^1^0^1\) Possibilities for the success of this cooperative accrediting arrangement could be quite positive according to surveys of college administrators.\(^1^0^2\) Similar cooperative efforts also have been judged positive.

Accreditation is an evolving process "which has contributed much toward creating the strong institutions required by our dynamic society."\(^1^0^3\) Though standards are unvalidated, the record of accomplishment of accrediting processes shows worthwhile changes in institutions and professional programs. Accrediting agencies are constantly

\(^9^9\) Cookson, "Resist," p. 4.
\(^1^0^0\) Proffit, "Federal," p. 155.
\(^1^0^1\) Ibid., p. 150.
\(^1^0^2\) Elsass, "Opinions," pp. 28-29.
\(^1^0^3\) Boyd, "Development," p. 191.
upgrading their processes and are better than ever. The question is, "Is 'better than ever' good enough?"

Universal accreditation as a function of NCATE has been long advocated by NASDTEC and TEPS (the National Commission on Teacher Education and Professional Standards). These and other groups believe that the experience of NCATE has facilitated its development as the universal accrediting agent. It is large and well established, has reciprocity agreements with thirty-one states, accredits institutions in all fifty states, and has the broadly based coalition necessary to effect universal accreditation. Such a move would surely increase the consumer protection role of NCATE—a role already difficult to "guarantee."

The charge to NCATE therefore could become one of attempting to satisfy a misconception. Accountability is not and cannot become a "complete" process. There is "no more justification for standardization" of standards than there is for "standardization among the institutions and programs which they accredit." Learning is contextual and does not lend itself to universal measures; therefore, a universal model of education is not possible. The misconception of the possibility of making higher educational programs of teacher preparation adaptable to universal standards must be clarified by the

106 Callegos, "Call," pp. 25-26; and Gubser, "Director," p. 117.
107 Peterson, "Profile," p. 308.
demonstration by these institutions that they have defendable differentiated purposes, processes, and products. Colleges and universities must work together to legitimate their organizational life.

The higher education community "has a vested interest in its mutual survival." Institutions must develop statements of educational outcomes that are clear, precise and defendable. In order to do this, a research base and appropriate evaluation techniques will have to be found. The freedom of the academic community and its privileged position obligates its members to strive for the highest level of quality possible.

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109 Ibid.
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Additional Works


