

Demographic and Economic Data Drive Innovation in Quality Assurance

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Abstract: With an area comparable to Scotland and a population the size of greater Glasgow, the US state of Maine faces demographic and economic challenges to which its public universities must respond. Maine faces a 15% decline in its working age population, for example, and a commensurate reduction in traditional-age students. The seven public universities are organized into the University of Maine System led by its Chancellor with a single governing board. Ultimately it is the System that must provide higher educational opportunities to serve the economic and civic needs of the state and the interests of its population. The state-wide data make a compelling case for greatly increased coordination among the universities to function as a single entity, yet the US accreditation system was designed to accredit single institutions. This session will explore the partnership between the University of Maine System and NECHE, the quality assurance agency, that has resulted in the accreditation of the System as a whole. Particular attention will be paid to how this development enhances educational opportunity for students in Maine.

1. Maine and the University of Maine System

Maine is the most northeastern state in the US, bounded on three sides by Canada and the Atlantic. Its most striking characteristic is its natural beauty, a characteristic highlighted by its rural nature and low population. For purposes of comparison, Maine is larger than Scotland in area (35,385mi² vs. 30,081mi²) but with only a quarter of its population (1.35MM vs. 5.5MM). Indeed, Maine's total population is only about 80% of metropolitan Glasgow's.

Most public higher education institutions in the US are part of a system, a legislatively established organization encompassing a number of individual institutions under a single governing board with full fiduciary responsibilities. In addition to an independent maritime academy, Maine has two public higher education systems: the Maine Community College System with seven 2-year institutions and the University of Maine System (UMS) with seven 4-year institutions all of which, until recently, were separately accredited. We are here concerned only with UMS.

UMS's challenges derive primarily from the state's demographic and economic facts, facts Maine shares with many rural, sparsely populated states. It has a stagnant demographic (with an estimated cumulative growth 2016-2036 of just 0.6% and a projected decrease in traditional college age students of greater than 15%) and a lagging economy (2018 median household income is \$55,425 compared to the national median of \$64,324).¹ These conditions mean that

¹ Sources: <https://www.Maine.gov>; Nathan D. Grawe, *Demographics and the Demand for Higher Education* (Baltimore: The Johns Hopkins Press), 2018.

Maine struggles to provide the level of sustainable investment required to support a robust educational system. Furthermore, as is the case everywhere, UMS also faces markedly increasing competition, especially from alternative delivery systems. Finally, these issues existed pre-COVID, and however serious the current health situation is, they will be here after the pandemic has subsided.

The most obvious and pragmatic response to these challenges is to optimize available human and capital resources, deploying them wherever they best serve the students and state. One constraint on this response, however, is that as a public, statewide institution, UMS must serve the entire state. Therefore, while small struggling campuses may be poorly positioned individually, closing them is neither sound policy nor good politics. The question, therefore, is not whether but how these institutions are to continue.

In addressing this last question, two structural barriers came to the fore. UMS, like most public U.S. systems, functioned as a federation, not a true system, unable to respond effectively to this magnitude of endemic challenges. Moreover, because each UMS institution was individually accredited, a new and different relationship had to be developed between UMS and its institutions' accreditor, the New England Commission of Higher Education (NECHE). That is the story we will tell here.

2. NECHE and U.S. Accreditation

Accreditation in the U.S. traces its roots to 1885 when Harvard President Charles Eliot with some New England counterparts worked to develop a list of legitimate colleges and universities in these six states. This early work led to the establishment of the New England Association of Schools and Colleges (NEASC), the first quality assurance body in the U.S. and arguably in the world. NECHE was part of that organization until 2018 when it became a separately incorporated charitable organization dedicated to quality assurance for higher education institutions in New England. The Commission itself – 27 volunteers including institutional and public representation, elected by the membership – makes all of the policy and accreditation decisions. The staff support the work of the trained volunteers, those who conduct the visits and those who serve on the Commission.

Today the principal institutional accreditors in the U.S. are the seven regional accreditors; they accredit about 3,000 colleges and universities enrolling approximately 20 million students.²

In the US, accreditation is said to be voluntary, and unless required by the state, it is. There are important incentives, however, including access to student federal financial aid. Because NECHE is “recognized” by the US Department of Education through a review process every five years, it is the gatekeeper to approximately \$1 billion annually in federal financial aid for students at the 220 colleges and universities it accredits.

These colleges and universities include public and independent plus two for-profit institutions. They vary by size, scope, and mission. Some are large (SNHU with 180,000 students, mainly online); small (Conway School of Landscape Design, 18 students in an eponymous master's

² See here for a map of the regions: <https://www.chea.org/chea-almanac-online#summary-qtr>

degree program); known around the world (Harvard, Yale, MIT); religious (Hebrew College, Hartford Seminary); public (University of Maine, Middlesex Community College); broad-range (Boston University) and specialized (U.S. Naval War College).

Regional accreditors are membership organizations with the members being the accredited institutions. This dual identity – as quality assurance agencies and membership organizations – explains the balance between quality assurance (for the public) and quality improvement or enhancement (for the members).

Accredited institutions have a comprehensive evaluation against the Commission's *Standards for Accreditation* every ten years and submit an interim report at the mid-point.³ In addition, the Commission may request additional reports, schedule focused visits, or request information about finance and enrollment. Institutions may request substantive changes, a federal term signifying major changes in structure or degree offerings. They may also request an advisory opinion which provides early feedback from the Commission on a contemplated major change before a formal request is made to approve that change. In 2015, UMS requested an advisory opinion concerning the kinds of integrative changes it was undertaking and the possibility of unified accreditation.

3. Building the UMS/NECHE Partnership

The changes UMS needed to make required addressing the previously noted structural barriers: its operation as a federation, reinforced by its institutions' individual accreditations. To start the transformation from federation to a fully functioning system, it was first necessary to begin getting the stakeholders to think of their work as part of a whole in how UMS operated, if not (yet) in terms of organizational structure. Practical initiatives proceeded on two fronts: administrative integration and academic collaboration. At the same time, new lines of communication and engagement were opened between UMS and NECHE. Previously, there had been no formal communications and few informal ones as systems were not accredited and therefore were not within NECHE's usual scope of engagement. These new communications and the resulting environment of trust and innovation were the foundation of the burgeoning UMS/NECHE partnership, which in turn resulted in a systematic engagement of NECHE with other public systems of higher education in New England.

Administratively, UMS centralized management of the finance, human resources, information technologies, procurement, and facilities functions while leaving their operations distributed across the campuses. As part of this initiative, UMS created a unified financial management structure for the entire enterprise with campus CFOs having a dual reporting line to both the campus president and the System vice-chancellor for finance and administration. While the creation of this management structure was central to the reform effort, it raised questions about whether the individual institutions now had sufficient autonomy to manage and to be held responsible for their financial health as required by the accreditation standards. Here was where the enhanced UMS/NECHE partnership first came into its own. The dual reporting line was a jointly designed innovation that allowed appropriate system management and accrediting

³ NECHE's Standards for Accreditation are here: <https://www.neche.org/resources/standards-for-accreditation/>

oversight while also providing necessary tools and resources for the System to plan and act as an integrated whole. It was a striking beginning that has proved to be a critical success.

The academic situation was more complex. Building substantial academic collaborations in Maine's resource-constrained environment meant developing multi-institutional programs, both to avoid unaffordable redundancies and to create stronger offerings. These collaborations had been going on in limited informal ways for some time, but institutionalizing the operations and taking them to scale was quite another matter. Here, however, efforts collided with the NECHE Standards. How, the accreditors asked, can one be clear about authority and responsibility if there is not a single point of control and accountability? How is quality to be assured if lines of authority and accountability stretch across accreditation boundaries? It is at this point that UMS reached the limit of what could be accomplished under the multi-accreditation model.

4. The Limits of Adaptation

There are three limits on how much the Commission can adapt. The first is legal. In order to be recognized by the U.S. Department of Education, the Commission must operate within the framework of the Higher Education Act and the regulations growing from that law that are the Criteria for Recognition.⁴ The second limitation is the Commission's own standards and policies. Thus, if an institution proposed that it would meet eight of the nine Standards, but wished to be excused from meeting the standard on, e.g., *Planning and Evaluation*, the Commission would be obliged to deny that request. The third limitation is that the Commission is committed to maintaining that balance between quality assurance and quality improvement. If an institution asked the Commission to participate only in the quality assurance portion of the process, the Commission would deny the request.

A salient issue with was whether UMS would, in the eyes of the US Department of Education, meet the relevant legal definition of an institution of higher education. To meet that definition, an institution must: admit students who are high school graduates or have a certificate of recognized equivalency; be legally authorized by the state to provide postsecondary education; award a bachelor's degree or an associate's degree transferable toward a bachelor's degree; be a public or other nonprofit institution; and be accredited or a candidate for accreditation with an agency recognized by the Department of Education.⁵

Together, NECHE and UMS hired an attorney, someone who had previously worked in the Department of Education. With our attorney, we believed that UMS did meet the legal definition of an institution of higher education necessary for UMS students to be eligible for federal financial aid. Together, we obtained a ruling from the Department concurring with our reading of the law. (It is worth noting that not every state system would meet this definition.⁶)

⁴ The Criteria for Recognition specify what some of the standards must address; for example, the Commission must have a standard on faculty but the details are not specified.

⁵ <https://www.law.cornell.edu/uscode/text/20/1001> Provision for for-profit institutions is elsewhere in the law.

⁶ If, for example, state law is written to grant institutions rather than the system degree-awarding powers, the system would not qualify as "an institution" for federal financial aid purposes.

The next steps, then, were: 1) for the Commission to decide whether if UMS asked to be accredited and if it demonstrated on paper that it met the *Standards for Accreditation*, would the Commission approve the request; and 2) for the University of Maine System to decide if it wanted to ask and, if so, to develop a report demonstrating that it did meet the Standards. In Spring 2019 the Commission answered (1) in the affirmative.

5. Accountability and Autonomy

In determining whether to seek unified accreditation, the UMS Trustees needed to reconcile three jointly incompatible requirements: the move to integration and collaboration as required by the data; the need for clear accountability; and the need to address the matter of institutional autonomy. It was institutional autonomy, after all, that had grounded the accreditation quality assurance process and was now the focal point of the change process.

Individual campuses have traditionally thought of themselves as essentially autonomous institutions, a view confirmed and strengthened by the accreditors' requirement that the accredited institution have the autonomy to manage its affairs and be held accountable in doing so. But this concept of institutional autonomy is rapidly changing, especially for institutions in public systems.⁷ There are many reasons for this change, but one that is centrally applicable to Maine is this: Public systems serve the state and all its citizens. Any configuration that limits the System's scope of planning and action to something less will therefore fail to meet its mission. Accountability, on this view, rests inevitably in the system's governing board and its core leadership, a chancellor or president depending on local nomenclature, in consultation with campus leadership. But now the individual institution's autonomy is necessarily subsumed under that of the system. In Maine's case, that led to UMS's Board of Trustees to seek unified system accreditation. This resolved the other two issues. Final accountability now clearly rests with the System, and the accreditation barrier to integration and collaboration is resolved. While much of the work centering on integration and collaboration had already occurred by 2017, material work focusing on unified accreditation got underway that year. The major analyses were completed by spring of 2019 and the Board acted to adopt system accreditation in 2020, requesting acceptance by NECHE in the form of a substantive change request.

6. The Outcome

In June 2020, the Commission approved the substantive change request. The University of Maine System is now an accredited institution.

By regulation and policy, there will be two follow-up visits by trained peer evaluators, each to review and validate a report prepared by the System. The first visit in Spring 2021 is a "substantive change visit," the purpose of which is to inform the Commission's consideration in Fall 2021 that the System is operating as it said it would. The second visit in 2022 will be a comprehensive evaluation, the purpose of which is to inform the Commission's consideration that the System meets each of the Standards and that it uses evidence to support a candid self-

⁷ This change is, however, not limited to systems. See, for example, S. Johnstone, M. Goldstein, and J. Page, "The Fading of the Autonomous Institution" in *Change: The Magazine of Higher Learning*, Vol.52, Number 4, pp. 7-14, July/August 2020.

reflection on how and how well it meets the Standards and that it has realistic plans for improvement.

7. General lessons

At the end of the day, all these changes are to be measured by how they enable UMS to serve its students and the state. We believe there are six general points to draw from the present case.

First, (the right) data matter. In the case of public institutions, it is the external data such as statewide demographic and economic data that drive strategic change. It is also external data, including educational attainment as well as individual and state economic growth patterns, that provide the objective measures of success. For public institutions, these kinds of data must always be the primary measure of institutional success.

Second, key for NECHE is institutional mission, in this case the UMS mission. The Commission accepted the System's clear expression of the demographic and economic data that challenged it to ensure that collectively its institutions could provide the best possible educational opportunities for the people of Maine and that doing so required a higher level of coordination and enhanced sharing of academic resources.

Third, unified accreditation does not in itself guarantee stronger educational outcomes. It removes barriers and creates new processes that in the hands of creative faculty and staff will build stronger and more inclusive programs. How that plays out for UMS remains to be seen, but what is clear is that Maine students now have resources and opportunities that were not open to them before.

Fourth, as circumstances change, so must accreditation. As a membership organization, NECHE must be in tune with the field. Since 1885, higher education has changed beyond what Charles Eliot and his colleagues could imagine. This lesson is not new, but it highlighted for Commissioners the need to be responsive to current conditions while remaining true to the Commission's mission and purposes. Work with UMS led NECHE to engage on a regular basis with the other systems in New England.

Fifth, the relationship with the federal government is critical. The Principal Deputy Undersecretary understood the proposed change and said her staff would help get it done. The question was not "whether," but "how." In the US, there is reference to the "triad" that assures educational quality: the state, the accreditor, and the federal government. As with many concepts, execution is uneven; in this case, the triad worked as envisioned.

Finally, perhaps the most important lesson for both UMS and NECHE is that trust and candor are key. No surprise. The many meetings, progress reports, visits to institutions, emails and phone calls between the System and Commission staff helped develop a shared understanding of the anticipated/proposed changes as well as the Commission's expectations, creating a partnership that became a crucible for change and which, for both organizations, was always about assuring access to quality higher education for the people of Maine.