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The Evolution of Quality Assurance in Higher Education

by

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Abstract

Based on the historical foundations of American higher education, there are a number of references in the literature to important milestones relating to institutional quality and accountability, particularly with regard to program review, evaluation, assessment and accreditation. And even though accreditation did not exist as we know it in higher education’s earliest history, it is still possible to identify those developments that were precursors to contemporary practices in accreditation and assessment. Through the use of appropriate citation of researchers and writers on the issues of institutional quality and accountability, this article critically discusses how these early developments influenced the growth of accreditation and quality assurance as they are conceptualized and practiced today. This essay also discusses why there has never been complete government control over higher education and accreditation in the United States of America, even though recent developments around the Reauthorization of Higher Education Amendments tend to lean more and more in such a direction.
To understand how accreditation germinated in the late nineteenth century and then populated in the twentieth,¹ it is necessary to first understand the foundation of important higher education milestones relating to quality and accountability, particularly with regard to program review, evaluation and assessment that existed during the Middle Ages. As Selden points out, “The entire world owes a debt of gratitude to the medieval genus for the concept of universities dedicated to the spirit of learning.”²

Mediaeval Institutions and Their Influence on the Foundation of American Higher Education

Even though mediaeval universities had no libraries, laboratories, museums, no college journalism, and no athletics (as today’s), higher education of the twentieth century is the lineal descendant of mediaeval universities of Paris and Bologna,³ and have the same collegial atmosphere as Oxford and Cambridge.⁴ The fundamental organization of these mediaeval institutions is the same, and the historic commitment to maintain standards of institutional quality and accountability, particularly with regard to program review, evaluation and assessment, is unbroken.

Mediaeval students initially formed guilds to protect their mutual interests and maintain standards. These students made professors accountable by collectively putting their masters under bond to live up to a minute set of regulations which guaranteed their students the worth of the money paid by each. If a professor failed to secure an audience of five for a regular lecture, he was fined as if absent.⁵ But even the domineering student-guilds of Bologna left to the masters the indefensible right, which every professional guild possessed of examining into qualifications of candidates for admission into the profession.⁶ Such was

² Ibid, p. 7
the case in Paris, a center of theological studies and arts, where masters and students were either clerics or were so regarded, and the masters’ organizations were the units of the university structure.\footnote{Hofstadter, Richard, and Metzge, Walter P., The Development of Academic Freedom in the United States. Columbia University Press, New York, 1955, p. 4} Professors formed their own master-guilds to maintain institutional quality. And inasmuch as ability to teach a subject was a good test of knowing a subject, students took the professor’s license (licentia docendi) as a certificate of attainment.\footnote{Haskins, Charles, Homer, The Rise of Universities. Great Seal Books, 1957, p. 11} Such in its essence was the idea of the ‘conventus’, ‘principium’, or ‘inceptio’ – the simple institution that formed the keystone of the whole university constitution.\footnote{Powicke, F. M. and Emden, A. B., The Universities of Europe in the Middle Ages. 1936, Vol. I, p. 149}

Princes and popes controlled the institutional standards of mediaeval universities by granting charters, thereby, officially creating studia generalia and extending to masters and students special privileges including exemption from taxation, from military service, and from trial in courts of civil magistrates.\footnote{Selden, W. K., Accreditation: A struggle Over Standards in Higher Education. New York: Harper and Brothers, 1960, p. 8} Papal bulls further enlarged the privileges of universities through the bull Parens scientiarum, which gave universities apostolic sanction for the right to suspend lectures and ratify their authority to make their own statutes.\footnote{Hofstadter, Richard, and Metzge, Walter P., The Development of Academic Freedom in the United States. Columbia University Press, New York, 1955, p. 8} Resultantly, even though princes and popes controlled institutional standards, through charters, their sanctions expanded the power and afforded the medieval institutions greater control over their internal program review, evaluation and assessment.

The Influence of the German Universities on American Higher Education

After almost complete inactivity during the seventeenth and eighteenth centuries, a birth of nationalism began in Germany after the Napoleonic victory over the Kingdom of Prussia,\footnote{Hofstadter, Richard, American Higher Education: A Documentary History. The University of Chicago Press, 1961, p. 523} and ignited State program review, evaluation and assessment of the medieval university that led to the formation of the University of Berlin in 1810.\footnote{Selden, W. K., Accreditation: A struggle Over Standards in Higher Education. New York: Harper and Brothers, 1960, pp. 9-10} The result of this program review, evaluation and assessment resulted into a new type of institution of true

higher learning which emphasized scientific research, the pursuit of truth through original investigation, and the concept that a true university must maintain freedom of teaching and freedom of learning within certain carefully defined limits.\footnote{Brubacher, John, S., and Rudy, Willis, Higher Education in Transition: A History of American Colleges and Universities, 1636-1976. Harper and Row, Publishers, New York, 1976, p. 174} Germany thus became the home of the first great modern universities and the scientific, philological, historical, and philosophical research conducted there made famous names like Berlin, Heidelberg, and Gottingen.\footnote{Church, Robert L. and Sedlak, Michael W., Education in the United States: An Interpretive History. The Free Press, New York, 1976, p. 245}

The German laboratory and seminar offered future American professors a novel mode of life, a private mode that turned them aside from the everyday world of society, politics, morality and religion.\footnote{Veysey, Laurence R., The Emergence of the American University. The University of Chicago Press, Chicago and London, 1965, p. 135} It was the German contribution of the conception of a university as a research institution, which redefined their quality, and accountability of universities in the United States. For, before 1850 the word university denoted: (1) a college with at least one professional school attached to it, such as the University of Pennsylvania or Harvard University; (2) simply a state controlled institution of higher learning, such as the University of Georgia or the University of North Carolina; (3) a state-controlled institution with one or more professional schools which also offered a wider assortment of elective courses, such as the University of Virginia; (4) any colleges that aspire to be grand, as did numerous institutions in the South and West.\footnote{Hofstadter, Richard, and Metzge, Walter P., The Development of Academic Freedom in the United States. Columbia University Press, New York, 1955, p. 369} This level of intellectual leadership and scholar influence were sustained by German universities for a hundred years after the 1810 founding of the University of Berlin, which made Germany the intellectual capital of the world, the place to which scholars and scientist looked first for light and leading.\footnote{DeVane, William, Clyde, Higher Education in Twentieth-Century America. Harvard University Press, Cambridge, Massachusetts, 1965, 175} Finally, Brubacher and Rudy suggest that the impact of German university upon nineteenth-century American higher education is one of the most significant themes in modern intellectual history.\footnote{Brubacher, John, S., and Rudy, Willis, Higher Education in Transition: A History of American Colleges and Universities, 1636-1976. Harper and Row, Publishers, New York, 1976, p. 174}
Centralized Control of Institutional Quality and Accountability

About the same time that the University of Berlin was being formed, the university in France reappeared in 1808, out of the ashes of its university of masters at Paris, which reigned in intellectual supremacy from the end of the twelfth to the middle of the sixteenth century.20 After careful program review, evaluation and assessment of higher education in France, Napoleon reorganized the universities into a single centralized, state-controlled institution directly administered by the government under the Grand Master in Paris.21 As a result, the state formed the Universite de France that became a permanent system of public instruction under the control of France’s Ministry of Education.22 This form of control of institutional quality and accountability whereby ministries of education were assigned broad powers of policy and administration can be found with varying degrees of modifications in countries of continental Europe, and in Arab countries of the Near East.23 Furthermore, the French state-control of higher education quality and accountability, particularly with regard to program review, evaluation and assessment standards was the model followed by American state-controlled institutions like University of Virginia as Hofstadter discussed above.

Institutional Control of Quality and Accountability Through Charters

Like universities in Germany and France, Oxford and Cambridge also experienced a revival during the nineteenth century through several acts of Parliament. Most notably, the Test Act of 1871, which removed membership of the Church of England as a requirement for degrees and faculty promotion.24 This new found academic autonomy paved the way for Oxford and Cambridge to develop the uniquely English academic innovation of subunits,

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21 Ibid, p. 11
23 Ibid, p. 12
24 Ibid, 13
called colleges. In order for these colleges to function, a charter was required from whoever had the power to grant that authority. These colleges were only granted authority to teach. All examinations were externally administered by the chartering university.

A charter to a university such as Oxford or Cambridge was a symbol of authority – the ultimate mechanism to control institutional quality and accountability, particularly with regard to program review, evaluation and assessment - to grant degrees to students enrolled in affiliate colleges. And those degrees carried certain valuable privileges with them. Charters to universities were a grant of a monopoly to grant degrees in a geographical area. They were much like the charters granted as a monopoly to other guilds of masters who were providing other goods and services in the towns in which they were located. But while colleges and universities underwent many changes between the 12th and 17th centuries, charters in the American colonies were still a monopoly grant to an institution of the power to grant degrees in a specific colony.

New Knowledge and its Influence on the Reevaluation and Assessment of American Higher Education

In his 1950 book entitled “The American Mind-An Interpretation of American Thought and Character Since the 1880’s, Commanger altercated that the impact of Darwin on religion was shattering, and his impact on philosophy was revolutionary. The impact of Darwin on religion was especially challenging in higher education, since, at the time of the unveiling of his theory in 1850, Congregational, Presbyterian, Episcopal, Baptist, Methodist, Catholics and other religious groups were vigorously establishing institutions. At the core of the religious resistance, making it hard and bitter and giving it desperate strength, was not

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25 Trow, p. 2
26 Ibid, p. 2
so much ignorance as fear. The fact was that while Darwin had labored to make the natural world intelligible and pellucid, to many of the men of his generation he had rendered that world cold and repellant, and they fought to keep it safe from his negotiations. In their documentation of the struggle for academic freedom in American academia, Hofstadter and Metzger concludes that most of the evolutionary scientists thought Darwin had delivered the coup de grace to the main tenets of natural theology, for no longer did they accept literally the Adamite version of creation nor resort to Paley’s arguments.

Finding it difficult to both reconcile their religious beliefs with scientific discoveries and to provide adequate funds to support the colleges in an era of profound social change, the clerics lost their former dominant influence and gave way to men of academic specialization on the faculties and to men of business and finance on the boards of trustees.

Governance of Colleges in Colonial America

Colleges in Colonial America did not posses the governing structure to control standards in higher education like that of their mediaeval ancestors. Colonial colleges enjoyed no endowments and inherited no guild of scholars. As a result, through necessity, outsiders - boards of trustees, which were composed mainly by clergymen and philanthropic laymen, controlled institutional quality and accountability. In contrast, the universities in Europe had evolved from self-governing groups of teachers and students or from within a court or church hierarchy itself. In these self-governing institutions, the masters and students received charters that governed institutional quality, for the medieval university began to take shape when teacher and student first came together and formed societies and guilds. In contradiction to the self-governance of the early universities, there was no class of faculty,

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30 Ibid, p. 344
32 Ibid, p. 18
masters, teachers, or professors to organize its own institutions, in the colonies. In support, Thorstein Veblen argues that governing boards – trustees, regents, curators, fellows, whatever their style and title – were an aimless survival from the days of clerical rule, when they were presumably of some effect in enforcing conformity to orthodox opinions and observances, among the academic staff. Although it has often been thought that this was an American innovation, the Colonies had European models to imitate or adapt.

First, Florentine professors trying to escape the tyranny of the student guilds, appealed to the local towns for relief. Sympathizing with the professors, the town authorities set up a lay board of curators to administer financial subsidies to them and thus make them independent of the students. Calvin imposed a latter example on the University of Geneva, by subjugating the control of the university to four executive officers of the council, which governed the city. The relatively weak position of the college tutors, proprietary instinct of the founders, and particularly the clerical insistence upon orthodoxy combined to establish trustee control as the accepted pattern in the American Colonial College. However, as colonial and state assemblies demanded representation on the boards equal to that enjoyed by the clergy, the boards of trustees of the colleges gradually became secular.

The Legacy of the Early Colonial Colleges

It is upon this accepted pattern of governing boards that the American Colonial College laid its foundation with the establishment of Harvard College in 1636; College of William and Mary, 1693; Yale College, 1701; College of Philadelphia, 1740; College of New Jersey, 1746; King’s College, 1754; College of Rhode Island, 1765; Queen’s College, 1766;

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38 Meiklejohn, Alexander, The Experimental College. The University of Wisconsin Press, 2001
and Dartmouth College, 1769. From these colleges had emerged an American system of collegiate education different not only from the English models with which Americans were familiar but from all others as well. First, while American collegiate education, like that of Europe, was the ward of religion, its patterns of essentially private denominational sponsorship, with modest mixture of state supervision, was new. Second, unlike the European universities, these American colleges had no connection with professional and advanced faculties – that is to say, they were colleges but not, strictly speaking, universities.

Review, Evaluation and Assessment of Curriculum in Colonial Colleges

If Latin was the language of the reformation, Greek and ancient Greece was the discovery of the Renaissance, and the curriculum of the colonial college necessarily made room for both. Of course the Reformation and the Renaissance had only indirectly stirred the American Forest. The founders of Harvard attempted to re-create old Cambridge’s embodiment of an amalgam of the Reformation and Renaissance of early sixteenth century England – an emergence of a gentleman class and a need for its training. As the Puritans began construction of a new provincial college – Harvard College – they had two liberal education traditions to draw upon: 1) an institutional one growing out of the medieval university that used liberal education for the purposes of acquiring knowledge and of training the intellect, relying on Christian piety for moral training; and 2) the Renaissance humanist tradition that saw liberal education not merely as a way of instilling knowledge, but essentially as a moral process that would develop such personal traits as civility and sociability,

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and such public virtues as integrity and wisdom.\textsuperscript{42} Along with mathematics, logic, and moral and natural philosophy, no colleges were more committed to this program of study than Yale and Princeton, and no colleges exerted more influence in the founding of other colleges than did these two academically and religiously conservative institutions.\textsuperscript{43}

**Curriculum Review, Evaluation and Assessment: The Influence of the Yale Report**

To respond to their critics who opposed the retention of the “dead’ languages, Yale’s leadership in furnishing the largest number of college presidents and, with Princeton, faculty members to the new colleges of the South and West wrote the Yale Report and made it the most influential document in American higher education in the first half of the nineteenth century.\textsuperscript{44} As a thoroughgoing defense of the traditional American liberal-arts college, the Yale Report gave heart to the academic conservative everywhere, by declaring that a prescribed curriculum, featuring the thorough study of the ancient languages, was the only proper system for a college\textsuperscript{45} The writers of the 1828 Yale Report, thus had taken the basic structure of republican liberal education – the classical curriculum – and made it the instrument not of virtue nurturance but of mental discipline. In doing so gave liberal education a rationale palatable to the new entrepreneurial society.\textsuperscript{46} The authors of the report further noted that the study of the classics was useful, not only to lay the foundation for correct taste, and furnish the student with those ideas which were found in the literature of modern times, but as a study to form the most effectual discipline of mental faculties – that the classics afforded materials to exercise talent of every degree, from the first opening of the youthful intellect to the period of its highest maturity.\textsuperscript{47}

\begin{itemize}
  \item \textsuperscript{42} Lane, Jack, C., The Yale Report of 1828 and Liberal Education: A Neorepublical Manifesto, History of Education Quarterly, Vol. 27, No. 3, Fall 1987, p. 327
  \item \textsuperscript{43} Selden, W. K., Accreditation: A struggle Over Standards in Higher Education. New York: Harper and Brothers, 1960, p. 22
  \item \textsuperscript{44} Hofstadter, Richard and Smith, Wilson, American Higher Education: A Documentary History. The University of Chicago Press, 1961, p. 275
  \item \textsuperscript{46} Lane, Jack, C., The Yale Report of 1828 and Liberal Education: A Neorepublical Manifesto, History of Education Quarterly, Vol. 27, No. 3, Fall 1987, p. 335
\end{itemize}
Although higher education reforms such as the Yale Report attempted to expand academic opportunities to accommodate more Americans wanting to advance their lives in the Emergent nation Era, their actions were inadequate.

**Curriculum Review, Evaluation and Assessment: The Influence of the Elective System**

The rise of an extracurriculum was a further eloquent protest that the traditional curriculum did not satisfy middle-class aspirations. Charles W. Eliot (1834-1926), president of Harvard University, endeavored to visualize the curriculum by taking it elective. Although the old institutions were transforming their curriculum, Harvard opened the elective system full-blown, rationalizing it as that which allowed young people to follow their own interest and learn whatever they felt would be useful. The elective system made such rapid headway in other institutions (experimenting with ways to achieve transform away from the rigid prescribed curriculum), that by the turn of the century more than half of the course enrollments across the nation were in optional classes. Indeed the central educational battle of nineteenth-century America was fought over the elective system. Involved in this struggle was a whole cluster of related issues, of which the central one was the following: Should the American college remain predominantly religious in orientation, training for Christian piety and a broad liberal culture or should it become essentially secular, serving the interest of utilitarianism, social efficiency, and scholarship research? Of primary concern to institutional self-governance was the question of, "What were the values of self-motivation as against external compulsion?"

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50 Ibid, p. 286
The Influence of Government Actions on Higher Education and Accreditation

Although the United States Constitution nowhere gives the national government specific power to exercise authority over education in the various states, federal influence has been nevertheless steadily increasing. The federal government’s first interest in higher education was the project to establish a national university. Jefferson had been a leader in identifying the critical interdependence of education and democracy, and his friends Du Pont de Nemours, Benjamin Rush, Noah Webster, James Sullivan, Robert Coran, and Nathaniel Chipman, all joined in the popular pastime of laying out a plan of education for the new Republic. In January, 1787, readers of the *American Museum* found in the magazine an article entitled “Address to the People of the United States,” written by Dr. Benjamin Rush. In the article Rush proposed the establishment of a federal university in which everything connected with the government, such as history – the law of nature and nations – and the principles of commerce – would be taught by competent professors, and the students of the university would consist of graduates of the state colleges. Rush went on to make the case that honors and offices of the United States should, after a while, be confined to persons who had imbibed federal and republican ideas in this university.

Rush and his Federalist associates, saw in a national university, a means to inculcate republican principles in the youth of the country, reconcile regional differences, and strengthen the union of the states under the new constitution. However, to the disappointment of the early Federalists, their bid to establish a national university was debated and defeated by delegates attending the 1787 Constitutional Convention in Philadelphia. Both Jefferson and Washington dreamed of founding a national university. In a message to Congress on December 2, 1806 Jefferson said:

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54 Ibid, p. 219
58 Ibid, p. 355
Education is here placed among the articles of public care, not that it would be proposed to take its ordinary branches out of the hands of private enterprise, which manages so much better all the concerns to which it is equal; but a public institution can alone supply those sciences which, though rarely called for, are yet necessary to complete the circle, all the parts of which contribute to the improvement of the country, and some of them to its preservation.\(^{59}\)

Determined to secure federal interest in higher education, this proposal to attempt to control standards in higher education through the establishment of a national university was repeatedly put forward, in one form or another, during the nineteenth and twentieth centuries.\(^{60}\)

As a result, the federal government encouraged the developments in postsecondary education through gifts of federal land and through its taxing and funding powers.\(^{61}\) On July 2, 1862, President Abraham Lincoln signed the Morrill Act donating public lands to several states and territories, which intended to provide colleges for the benefit of agriculture and mechanic arts. The law granted to the states 30,000 acres for each senator and representative, with the income from the sale of these lands to be applied “to the endowment, support, and maintenance of at least one college where the leading object was, without excluding other scientific and classical studies, and including military tactics, to teach such branches of learning as they relate to agriculture and the mechanic arts, in order to promote the liberal and practical education of the industrial classes in the several pursuits and professions in life.”\(^{62}\)


In the initial Land Grant Act of 1862, Congress appropriated funds to support one college per state. In states of dual systems of education, the colleges established under the 1862 legislation were for white students. The second Land Grant Act of 1890 called for the distribution of land-grant funds on an equitable basis, which resulted in the establishment of Alcorn College as the first of sixteen black land-grant institutions. In addition, when the second Morrill Act of 1890 ... the act stipulated that no appropriation would go to states that denied admission to the colleges on the basis of race unless they also set up separate but equal facilities. Seventeen states were so moved.

With the passage of the first Morrill Act, the federal government established the Bureau of Education in 1867 to collect and disseminate useful higher education information. With three years of higher education research in its database, the Bureau of Education took the initial steps in classification of deciding what institutions qualified as colleges and published a list of 369 institutions that qualified to be classified a colleges.

The bureau developed classification criteria based on the success of a college in placing its students in the graduate programs of institutions belonging to the Association of American Universities (AAU). With curriculum review, evaluation and assessment fresh on the minds of many college administrators towards the end of the nineteenth century, the federal government continued its attempt to influence institutional quality through the Bureau of Education collection of data on admission requirements from 475 institutions which found that of the 432 institutions offering bachelor of arts degrees, 93 percent were requiring Latin and 73 percent required Greek. In 1911, the Bureau of Education once again attempted to produce its own list of accredited institutions but withdrew from the process because of

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reaction against what the institutions perceived as government interference.\textsuperscript{69} With the
passage of the Serviceman’s Readjustment Act of 1944, the G.I. Bill of Right, the federal
government once again sought to control standards in higher education by authorizing the
Administrator (of veterans’ affairs) to secure from the appropriate agency of each state, a
list of educational and training institutions to be approved as quality institutions.\textsuperscript{70}

But, perhaps the following statement of Abraham A. Ribicoff, then Secretary of
Health, Education and Welfare, to a committee of the House of Representatives in March
1961, was a sobering indication of how determined and committed the federal government
was in its attempt to exert its control over institutional quality and accountability, particularly
with regard to program review, evaluation and assessment in higher education:

\begin{quote}
The question of whether the Federal Government should play a part in the
enterprise of higher education is simply not a real one. The Federal
Government has had an important part in that enterprise for 100 years. Its
part has grown dramatically in the last 20 years, and the real question that
faces us…is what shall the Federal Government do now, in 1961, to play
its part in ways that will contribute to the continued development of a
strong and vital system of higher education.\textsuperscript{71}
\end{quote}

The inauguration of the Higher Education Act of 1965 was one of the most important
pieces of federal legislation for higher education that provided a broad permanent program
of financial aid to both public and private colleges.\textsuperscript{72} But though the 1965 Higher Education
Act provided new funding programs under the Federal Government, colleges and universi-
ties increased their demand for some form of recognition, in addition to full accreditation, for

\begin{itemize}
\item \textsuperscript{69} Mosier, Earl, E., The Michigan Plan: Approval of institutions under the G.I. Bill. The Journal of Higher Education, Vol. 15, No. 9, December 1944, p. 469
\item \textsuperscript{70} DeVane, William, Clyde, Higher Education in Twentieth-Century America. Harvard University Press, Cambridge, Massachusetts, 1965, p. 126
\end{itemize}
without some form of recognition higher education institutions could not have received federal funding. It was within this context that the federal government used its officials to deepen its influence on institutional quality. For example, in testimony before a congressional committee just before he relinquished his post as Secretary of Health, Education and Welfare, Joseph Califano said that federal reliance on private accreditation was misleading parents and students into believing that the federal government vouches for the quality of any institution receiving federal funds. Califano then asked Congress to sever the link between private accreditation and institutional eligibility for federal programs in the Higher Education Act. Although Califano’s recommendation was not implemented, it engendered considerable discussion, and may have influenced amendments to the 1965 Higher Education Act, which contained alternative authority for the commissioner to approve a course, or institution’s eligibility, where accreditation was lacking.

Through the loan guarantee provisions in the 1972 Reauthorization of the Higher Education Act, the federal government had emerged as the principal financer of America’s programs of higher education, greatly benefiting proprietary schools by making them full partners in the receipt of federal student aid. Fifteen years after Califano’s proposal, the White House administration, in its recommendation for the reauthorization of the 1980 Higher Education Act, suggested that the link between accreditation and eligibility be severed entirely.

Granting that the United States Department of Education was beginning to look at its own role in accreditation and in determining eligibility, it was the 1992 reauthorization of the Higher Education Act provisions that higher education leaders interpreted as the most puni-
tive attack on the institutional autonomy of accreditation.80 Congress was particularly con-
cerned about the public accountability of institutions, due to high student loan default rates. Accrediting agencies were consequently held responsible for the state of affairs, especially the regional accrediting bodies that had a gate-keeping function with regards to Title IV funds for student loans.81 Consequently, Congress created the State Postsecondary Review Program, which empowered the states to determine the eligibility of institutions wishing to participate in the student financial aid programs of Title IV.82 In addition to those institutions identified by the Secretary, the SPREs were authorized, to review additional institutions which met one or more of the criteria, based on more recent data, or which the SPREs had reason to believe that these institutions were engaged in fraudulent practices.83 Even though the 1992 reauthorization of the Higher Education Act imposed new requirements and restrictions on accrediting agencies seeking recognition, the 1998 reauthorization of the Higher Education Act eventually eliminated language authorizing State Postsecondary Review Entities.84

What has evolved out of the federal government’s attempts to influence standards in higher education is a paradigm of no coordinating agency and no coordinating policy towards universities and colleges, which supports the reasons why there has never been complete government control over higher education and accreditation.85

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83 United States Statutes at Large, pp.635-637
84 Stephen, B., p.16
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25 Trow, p. 2

26 Trow, p. 2


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