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# An Examination of the Relationship between Accreditation and Learning Outcomes Assessment Standards in English Language Programs

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UNIVERSITY OF MIAMI

AN EXAMINATION OF THE RELATIONSHIP BETWEEN  
ACCREDITATION AND LEARNING OUTCOMES ASSESSMENT STANDARDS IN  
ENGLISH LANGUAGE PROGRAMS

By

Julia R. Cayuso

A DISSERTATION

Submitted to the Faculty  
of the University of Miami  
in partial fulfillment of the requirements for  
the degree of Doctor of Education

Coral Gables, Florida

August 2015

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Since the passage of the Accreditation Act of 2010, accreditation by an agency recognized by the U.S. Department of Education has been required in order for English language programs to recruit and enroll international students on student visas. There is one specialized accrediting agency in the U.S. that is authorized to accredit English language programs: the Commission on English Language Program Accreditation (CEA). That agency can issue specialized/programmatic or institutional accreditation awards.

Accreditation decisions by CEA were examined for possible relationships between three variables: accreditation type (programmatic or institutional), accreditation decision length (1-year or 5-year), and findings of compliance with a set of seven standards related to student learning outcomes and assessments. Data on initial accreditation decisions for schools within the U.S.A. were obtained directly from the Commission on English Language Program Accreditation for the period between April 2012 and December 2014. Data on length of awarded decisions, findings of compliance by the peer review team, and type of accreditation were evaluated using log-linear models; this was followed by probability and odds ratio comparisons for likelihoods between groups.

Analysis demonstrated a significant interaction between accreditation type and length of accreditation awarded, and a significant interaction between findings of compliance on standards related to learning outcomes and assessments and length of accreditation awarded. Awards of programmatic accreditation tended to be for longer periods of time than awards of institutional accreditation. Higher levels of compliance with standards related to student learning outcomes and assessment were found to be significantly related to lengthier awards of accreditation. No significant three-way interactions were found among the three variables examined.

Results of the study indicate that accreditation type is not related to compliance on standards related to learning outcomes. Whether the institution as a whole is being evaluated for accreditation or a unit within a larger institution was under review, the findings of compliance with standards related to learning outcomes and assessment were not significantly related.

Results underscore the importance of student learning outcomes and assessment of these outcomes as vital to the accreditation process and as markers of quality. The results of this study are useful to intensive English programs as administrators decide whether they are prepared to seek accreditation and how to best prepare the programs to meet the accreditation standards. Intensive English schools seeking accreditation should not underestimate the importance of having appropriate written learning outcomes, assessment instruments and procedures, procedures to inform students of their progress, and systematic review and revision of elements related to outcomes and assessments.

## DEDICATION

This dissertation is dedicated to my mother, Helen Yobst, a strong, independent, capable woman who has consistently been both a role model and supporter for me throughout my life. She taught me the meaning of high expectations and that there was nothing beyond my reach. She impressed on me the importance of higher education, and without her, I would not be who I am today.

This dissertation is dedicated to my siblings: my sisters and brother who are always there for me and continue to believe in my potential.

This dissertation is dedicated to my strong, supportive, and stable husband, Roberto, who never once questioned my abilities, capabilities, or capacity and who understood implicitly the importance of this *aventura*. You truly are my better half. It is dedicated to my son, William, and my daughter, Sophia, whose admission to college accelerated my desire to earn my doctorate. It has been a family trip; I love you very dearly.

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## **LIST OF ABBREVIATIONS**

ASPA – Association of Specialized and Professional Accreditors

CEA – Commission on English Language Program Accreditation

CHEA – Council on Higher Education Accreditation

ELT – English language training

ICE – Department of Homeland Security Immigration and Customs Enforcement

IEP – intensive English program

L&S – Length and Structure of Program of Study

MFA – multiway frequency analysis

MBNQA – Malcolm Baldrige National Quality Award

NILOA – National Institute for Learning Outcomes Assessment

PDPR – Program Development, Planning and Review

PHE – Planning for Higher Education

SA – Student Achievement

SLO – Student Learning Outcome

TQM – Total Quality Management

USDE – United States Department of Education

## **Chapter 1: Introduction**

As postsecondary education in the United States became increasingly popular and prevalent, a system of quality assurance became equally important (Brittingham, 2009). Accreditation in the United States is a formal quality assurance system involving a seal of approval by an external group ensuring adherence to certain standards of practice (Rooney & van Ostenberg, 1999). Historically, higher education in the U.S. focused on access, independence of mission, and experimentation, and therefore, any system of quality assurance needed to accommodate these aspects (Brittingham, 2009). A viable system of quality control was needed to address mission of the institution and access to students and the student experience; it would also need to be able to accommodate a variety of models for reaching institution-specific goals. Challenges inherent to this task include the diversity of institutions in the U.S., and the capacity of accrediting bodies to recognize and understand this diversity while striving to assure educational excellence (Middaugh, 2012).

Accreditation is the most well-known and widely used system of quality assurance in higher education in the United States (Garrity & Finney, 2007). It is a system of self-examination and peer-review, and equally important to its definition is the fact that it is voluntary (Brittingham, 2009; Eaton, 2012). It has been defined as a “voluntary peer review to ensure that colleges and universities conform to standards that define excellence within postsecondary education. The terms ‘voluntary’ and ‘peer review’ are critical” (Middaugh, 2012, p. 5). Whether it is truly voluntary, however, has been disputed because of the ties that accreditation has to the U.S. federal financial aid system (Brittingham, 2009). For most institutions of higher education, accreditation is

not optional, and thus not voluntary, because without accreditation from an agency recognized by the U.S. Department of Education, colleges and universities cannot receive federal financial aid monies. The Department of Education's Federal Student Aid *Annual Report – FY2011* reported that students in postsecondary institutions received over \$157 billion in financial aid in 2011 (U.S. Department of Education, 2011), and without that aid, many, if not most, of those institutions would not exist. Accreditation agencies, therefore, have been accurately described as the gatekeepers to federal financial aid monies (Ewell, 2009; Brubacher & Rudy, 2008; Gladieux et al. 2005; Ziomek-Daigle & Christensen, 2010).

Accreditation in the context of higher education administration has been perceived in different ways (Hagerty & Stark, 1989). For some, it conjures images of charts, tables, reports, assessments, indicators and outcomes, and the collection and review of data (Burke & Minassians, 2002; Crow, 2009; Ewell, 1990). To others, it is a badge of quality that an institution has met a minimum threshold for quality and standards (Rogers, 2000), and it is always a public recognition that the institution has attained a vote of acceptance by peer institutions (Atwell, 1994; Brittingham, 2009; Nettles, Cole, & Sharp, 1997). Peer review is the process of evaluating the work process, or output of an individual or group who operate in the same milieu as the reviewers (Lubinescu, Ratcliff, & Gaffney, 2001). Accreditation agencies recruit peer reviewers to analyze a self-assessment report prepared by each school seeking accreditation and to conduct an on-site evaluation to verify claims made in the self-study.

Accreditation has changed over the years. It began as a prescriptive process with an emphasis on tabulating input variables and checklists, and has evolved into a thorough

process of fact checking to focus on whether and how well an institution does what it says it does (Eaton, 2009a). The early processes and measures for accreditation were often not measures of best practice or accepted benchmarks in the field of practice. The transition of the focus of accrediting agencies from quantitative measures of acceptability to a steady focus on student outcomes has occurred over the past decade (Ewell, 2001, 1990). There is a growing approach within the accreditation community to place the student experience and student outcomes into the forefront (Kanter, 2013). The qualitative approach has not disappeared, but it has been joined by a quantitative concern for student welfare.

### **Significance of the Problem**

With the passage of the Accreditation of English Language Training Programs Act in 2010, the U.S. government began requiring English language training (ELT) programs to be accredited in order to be approved to admit foreign students (U.S. Immigration and Customs Enforcement Agency, 2014). The agency responsible for ensuring compliance with the act categorized ELT programs into two groups: combined programs and stand-alone programs. Schools that are located within institutions of higher education, many of them university-based programs, which hold regional or national accreditation from an agency recognized by the U.S. Department of Education, are defined as combined programs, and consider themselves exempt from this regulation, as they come under the umbrella of their host institution (Fischer, 2012; NAFSA, 2012a). Stand-alone, independent language institutes, however, have no such accreditation coat-tails to ride upon (Fischer, 2012). The Act mandates that stand-alone, independent English language programs hold accredited status in order to admit foreign students, a



student population which many ELT institutes, both university-based and free-standing, depend upon for their existence (USICE, 2014; NAFSA, 2012b). Thus, the enactment of this legislation, and ensuing enforcement by the U.S. Immigration and Customs Enforcement agency, opened a floodgate of ELT institutes pursuing specialized accreditation (Fischer, 2012). Previous to the act, motivations for ELT programs to seek specialized or programmatic accreditation included continuous improvement and a certification of excellence; in other words, the reasons were related to quality and promoting excellence (CEA, 2014a; Fischer, 2012).

One problem in the field of English language teaching programs is a lack of information regarding quality of the two program models: university-based programs and independent institutions. Stand-alone language institutions which may not have sought accreditation in the past are now required to do so in order to be allowed to admit foreign students (USICE, 2014). Stand-alone institutions apply to receive institutional accreditation, while university-based programs apply to receive programmatic accreditation. While the accreditation awarded is from one accrediting organization, there are two distinct types of accreditation. The schools, however, must meet the same threshold of standards and quality as other accredited programs with different program models (CEA, 2014b). A natural question is whether the schools being awarded the two accreditation types – institutional and programmatic -- have differences in meeting the standards and whether the two types of accreditation are being awarded of equal length at similar rates.

The federal government has mandated that all recognized accrediting agencies, whether they issue national, regional, or programmatic/specialized accreditation, address

student learning outcomes in their standards (CHEA 2006; Volkwein et al., 2007). The Southern Association of Colleges and Schools, a regional accreditor, mandates that colleges and universities develop a plan that focuses on student learning and includes assessment measures of outcomes (Banta, Pike & Hansen, 2009). It could be said, then, that assessment of student learning is a condition of accreditation, and, thus, it is linked to accountability and continuous improvement.

The significance of this study, which examines the relationship between accreditation and compliance with student learning outcome assessment standards for intensive English language programs, is that the results will be useful to several audiences. The research will be beneficial to the accrediting organizations as they review distinct schools and award different types of accreditation. Since they are the gatekeepers of access to the ability to recruit and enroll international students on student visas, these agencies will benefit from the research on their decision-making as it relates to a central issue of student learning standards. It will serve to inform the programs that have sought and will seek accreditation, and it will allow them to see how one type of accreditation compares with another. The lack of literature and research on accreditation of English Language Training programs may result in a poor understanding of the process of accreditation and of the attention paid to student learning outcomes in that process. This study will contribute to a better understanding of accreditation and the role of student learning outcomes and assessment standards, as well as the intersection between them. This study will also be useful to international administrators who are interested in building a system of quality control and accountability in the plethora of English

language training schools outside of the United States, as it will add to the literature of how student learning outcomes assessment standards relate to accreditation.

### **The Accreditation Process**

The accreditation process involves not only the stakeholders of the institution or program seeking accreditation, herein referred to as the “site” and the “school,” but also the accrediting agency's team. The process involves work by the schools’ and the agency's personnel and results in a comprehensive internal and external review (ASPA, 2014a). Following a self-study report prepared by the school, the accreditor sends a team of peer reviewers from outside the program to conduct an on-site review (ASPA, 2014a). The site visit by a team of trained, prepared reviewers is a vital part of the accreditation process. The Council on Higher Education Accreditation describes the site visit within the United States context as evaluation by a team of peer reviewers who examine the institution's self-study report; interview faculty, students, and personnel; and examine the structure and effectiveness of the institution and its academic programs (CHEA, 2006). This team performs specific tasks on site to verify the contents of the report submitted by the site. Team members are trained by the accrediting agency and are tasked with being the eyes and ears of the commission or agency. Prior to its site visit, the team prepares a pre-visit draft report; this working draft report is based on the peer review team’s reading of the self-study document and contains an initial measure of how well the site meets the standards (Spangehl, 2012; Hagerty & Stark, 1989).

Following the preparation of the pre-visit draft, the team visits the program or institution in person. While onsite, the team members interview administrators, support staff, faculty, and students in order to verify the contents of the self-study report (CEA,

2014a). They examine files and documents, observe classroom teaching, and tour the facilities. All of the onsite activities are aimed at verifying every claim and statement in the site's self-study report and evaluating the site's practices and policies against the accreditation agency's standards. During the site visit, the team members prepare a review team report. This report begins with the pre-visit report, and as observations, interviews, and document checks occur, the team members expand and confirm their initial findings into a final review team report (CEA, 2014b). For CEA, this report will contain a finding of "appears to meet," "appears to partially meet," or "appears not to meet" for each of the 44 standards (CEA, 2014a, p 23). According to the CEA Reviewer Handbook (2014), a finding of "appears to meet" signifies that the school complies with the standard. A finding of "appears to partially meet" means that the school partially complies with the standard or fails to meet one or more components of the standard. Finally, a finding of "appears not to meet" applies when a school fails to comply with the standard (CEA, 2014e, p. 20). The results of the onsite review are presented to the program or institution in writing. As with other aspects of the accreditation process, the written report is sent to the institution for comment and possible action prior to the final agency review (ASPA, 2014a).

The accreditation agency's decision-making body (e.g., council, commission, or board of directors) reviews the program or institution's self-study report, the on-site review team's report about the institution or program, and a written response from the school to that report in making a decision about the accreditation of the institution or program. Decisions about accredited status include the type of accreditation, length of accreditation and any conditions, recommendations or required reporting to which the

institution or program must adhere in order to maintain accreditation status (CHEA, 1998). A letter contains the official accreditation action and when appropriate, a separate clearly-marked section providing recommendations for suggested, not required, improvements that are not standards compliance issues and thus may be separate from the accreditation action (CEA, 2014b).

All accreditors recognized by the U.S. Department of Education must have criteria in the area of student achievement (Eaton, 2012b). More specifically, these agencies are required to have standards that address student success in terms of achievement of learning goals. Thus, the accrediting organizations have expectations of institutions to state the learning outcomes, and to collect and use evidence of student learning outcomes to confirm and improve student learning (NILOA, 2014). Institutional accreditors promote good practice and the “establishment of clear standards of student academic achievement” (Ewell, 2009, p. 13) and evidence-based assessments of that achievement.

In a paper prepared by the National Center for Higher Education Management Systems, for the Council on Higher Education Accreditation, Ewell (2001) stated that “Accrediting organizations – both institutional and specialized -- must become more aggressive and creative in requiring evidence of student learning outcomes as an integral part of their standards and processes for review” (p. 9). The national organization that coordinates accreditation activity in the United States agrees (CHEA, 2006).

The Commission on English Language Program Accreditation (CEA) conducts accreditation reviews in the United States and internationally. As the only specialized accrediting agency for English language programs and institutions in the United States

(CEA, 2014c), it offers two types of accreditation within the U.S.: programmatic and institutional. Hence, CEA is a specialized accreditor, but also awards institutional accreditations (CHEA, 2014). The two types of accreditation are awarded to at least two models of English language programs: the campus-based programs that meet the eligibility requirements apply for programmatic accreditation, while the independent institutions that are eligible apply for institutional. Programmatic accreditation is for “intensive English programs (IEPs) and English language units with a direct reporting line within the administration of universities and colleges, including community colleges, which are accredited by a regional or other institutional accrediting body” (CEA, 2014a, p. 15). The Association of Specialized and Professional Accreditors defines programmatic accreditation as reviewing a specialized or professional program within an institution of higher education or independent institution (ASPA, 2013c). The standards are “generally in-depth for a professional or focused area of study” (ASPA, 2013c, p. 1). Institutional accreditation, on the other hand, is for “independent English language schools/institutions that offer an intensive English program” (CEA, 2014a, p. 15) and are not administratively part of a university or college which is otherwise accredited by a regional or institutional accrediting body. In particular, institutional accreditation applies to the institute as a whole and to all programs within that institute; in effect, it is an institution-wide review that ensures that the “institution has key structural elements and finances to support the mission of the institution” (ASPA, 2013c).

### **Problem Statement**

The purpose of this study is to examine the relationship between compliance with student learning outcomes assessment standards and accreditation in English language

training schools accredited by the Commission on English Language Program Accreditation over the two year period following the enactment of the Accreditation of English Language Training Programs Act. For programs and institutes seeking initial accreditation, rather than re-accreditation, CEA awards either one-year or five-year accreditation based on compliance with the CEA standards. Sites that receive one-year accreditation are considered for an additional four-year accreditation (for a total of five years) based upon their responses to and compliance with reporting requirements. An additional purpose of this study is to examine findings of compliance with student learning outcomes assessment standards and accreditation decisions in two distinct types of accreditation awarded to English language training schools: programmatic and institutional. Therefore, the research will analyze accreditation length (i.e., five-year vs. one-year) issued by CEA related to findings of compliance on standards specifically dealing with student learning outcomes for two distinct accreditation types. CEA developed a total of 44 individual standards which are categorized into 11 standard areas. This study will examine findings for seven individual standards from three standard areas that directly relate to student learning outcomes. The study will identify accreditation length and accreditation type from data from the accrediting agency. This information is also available in the accreditation decision letter sent from the agency to the school. Further, it will identify findings of compliance related to student learning outcomes standards that are part of the site review team report. By examining the accreditation type, findings related to each of the seven standards related to student learning outcomes, and the accreditation award length, this research will examine relationships between

accreditation in English language training schools and findings on student learning outcomes assessment standards.

### **Research Questions**

The research questions that guide this study are as follows:

1. What is the relationship, if any, between the accreditation type and an accreditation length of one-year versus five-years?
2. What is the relationship, if any, between review team findings of compliance (the ability to meet, partially meet, or not meet) on standards related to student learning outcomes and the accreditation length of one-year versus five-years?
3. What is the relationship, if any, between accreditation type and review team findings of compliance for the standards identified as relating to student learning outcomes?
4. What is the relationship, if any, between review team findings of meeting, partially meeting, or not meeting individual standards identified as relating to student learning outcomes; accreditation type; and accreditation decision length of the Commission on English Language Program Accreditation?

The first research question in this study seeks to determine if there is a relationship between the accreditation type and the accreditation length of award. This question examines the relationship between the two possible accreditation types and two possible accreditation award lengths of one or five years. The second research question seeks to determine if there is a relationship between review team findings of compliance for seven individual standards relating to SLO's and assessments and the length of accreditation awarded. The third research question seeks to determine if there is a



relationship between accreditation type and findings of compliance for standards related to learning outcomes and assessment. This question deals with the interaction between the two different types of accreditation and meeting, partially meeting, or not meeting each of the seven standards identified as relating to student learning outcomes. The final research question examines the relationship, if any, between accreditation type, accreditation length, and the findings of compliance in the seven standards that relate to student learning outcomes and assessment.

### **Definition of Terms**

For the purposes of this study, the following terms are defined.

**Accreditation:** This refers to a voluntary, critical review process consisting of self-study, peer-review evaluation, and ongoing accountability. It is also the status of public recognition that an accrediting agency grants to an educational institution or program that meets the agency's standards and requirements (CHEA, 2006).

**Accreditation Decision:** For sites seeking initial accreditation, CEA may make the following decisions based on the site visit and after examining the site's self-study report, the review team report, and the site's response to that report: grant one-year accreditation, grant five-year accreditation, defer an accreditation decision for good cause, or deny accreditation (CEA, 2014b).

**Council for Higher Education Accreditation (CHEA):** This is an association that serves over 3,000 degree-granting institutions and 56 institutional and programmatic accrediting organizations. CHEA serves as a national advocate for self-regulation of higher education institutions (CHEA, 2012).

**Decision Letter:** Following deliberation, a letter from the Commission on English Language Program Accreditation stating the action taken by the commission and any reporting requirements and recommendations is sent to the institution or program (CEA, 2014a).

**Findings:** This term refers to the onsite review team's assessment of whether the site appears to meet, appears to partially meet or appears not to meet each standard (CEA, 2014a).

**Institutional Accreditation:** This is any accreditation that focuses on the institution as a whole (Eaton, 2012; ASPA, 2013c). This type of accreditation indicates that each part of an institution has been examined and plays a role in the mission of the institution's overall objectives.

**Peer Review:** Peer review is the use of experts in the field of inquiry to serve as reviewers. Accreditation peer reviewers receive training in the accrediting organization's standards and procedures (ASPA, 2014b).

**Programmatic Accreditation:** Also referred to as specialized accreditation, this accreditation normally applies to programs, departments, or schools that are units of a larger institution (Eaton, 2012; CHEA, 2014; ASPA, 2013c).

**Recommendations:** For the purposes of this study, this term refers to specific areas of improvements identified by the site review team during the accreditation site visit. These are documented in the review team report and may also appear in the accreditation decision letter (CEA, 2014a).

**Reporting Requirements:** Any standards-related requirement with which the program or institution must comply in order to maintain its accreditation is referred to as

a *reporting requirement*. Sites which are granted one-year accreditation must respond to *reporting requirements* in order to be considered for continued accreditation, which will total to a five-year accreditation period (CEA, 2014a).

**Review Team Report:** This term refers to the report prepared by the site review team which documents their findings for each standard and recommends actions in relation to accreditation (CEA, 2014b).

**Self-Study Report:** As part of the accreditation process, each institution or program must prepare an in-depth, written, self-assessment report evaluating how it meets each of the accrediting agency's standards and identifying areas for improvement (ASPA, 2014b).

**Site Review Team:** As part of the accreditation process, a team of trained volunteer evaluators, who are peers in the field, visits the institution or program seeking accreditation to review the evidence prepared and compiled by the institution and assesses compliance with published accreditation standards (ASPA, 2014b).

**Site Visit:** "A three-person team reads the self-study report prior to conducting a three-day on-site visit. The visit includes class visits, a tour of facilities, and interviews with administrators, faculty, and students in order to verify the contents of the self-study report. The team applies the CEA Standards in its review process. The review team report includes its findings related to each of the 44 CEA standards. The site receives the report and writes a response to the findings" (CEA, 2014b, p. 1).

**Specialized Accreditation:** Also called programmatic accreditation, this term refers to recognition in the United States that a specific program within an institution (in

contrast with institutional accreditation) has met established standards for that particular discipline (Eaton, 2012).

**Standards:** These are criteria and guidelines that institutions must follow and meet as they prepare for accreditation and in order to receive and maintain accreditation. Each accrediting organization has published *standards* or a handbook of accreditation which includes the *standards* (ASPA, 2014a).

**Student Learning Outcomes:** This term describes what students should know and be able to do by the end of their educational program. It refers to the degree to which students gain the applicable knowledge and skills and are stated in terms which are measurable, specific, and observable and link to aspects of the curriculum (ASPA, 2014a). This study examines accreditation standards that are related to student learning outcomes and assessments.

## **Chapter 2: Literature Review**

### **Historical Background**

Demands for quality assurance and accountability in higher education have shaped the development of accreditation, and, specifically, of specialized accreditation in the United States. The growing culture of assessments, accountability, and evidence align with the developments in accreditation. This literature review will examine several themes. First, it will present a brief historical background of accreditation in higher education and the issues involved. Second, it will examine the relevant theory of quality assurance and benchmarking as they apply to accreditation in higher education. It will also look at specialized accreditation, English Language Program accreditation, and the literature involved. In addition, it will examine the debate about accountability in higher education as it relates to accreditation. Finally, it will scrutinize the emphasis placed on assessment of student learning outcomes as it relates to accreditation.

**Accreditation in Higher Education in the US.** Accreditation has existed for more than 100 years in the United States, and it can be traced back to the early 20<sup>th</sup> century when the American Medical Association began classifying medical schools in 1905 (Eaton, 2012; Barker & Smith, Jr. 1998). It was preceded in the 19<sup>th</sup> century when colleges had membership organizations and associations (Middaugh, 2012). These were often regional in character, and focused on defining a college. In 1929, the New England Association of Schools and Colleges adopted standards of membership; however, these were definitions of the membership organizations rather than eligibility requirements. Institutions of higher education did not begin using the term *accreditation* until 1952 (Brittingham, 2009; Eaton, 2012).

That same year, 1952, the Veterans Readjustment Act tied federal financial aid to accreditation (Brittingham, 2009; Hartle, 2012). It was then that the U.S. government decided not to develop its own system of oversight, but to rely on nongovernmental authorities of academic quality for checks and balances (Eaton, 2012). A system known as the “triad” (Hartle, 2012, p.17; ASPA, 2013a) was born: the three players in this triad were state governments, the U.S. Department of Education, and accrediting agencies. Each member of the triad has a role in ensuring the eligibility of a college or university to receive federal financial aid funds. Accrediting agencies are connected to the U.S. Department of Education (USDE) through an agency created by Congress. This agency, the National Advisory Committee on Institutional Quality and Integrity (NACIQI), provides the USDE with recommendations as to whether to recognize accrediting agencies (Hartle, 2012; Brittingham, 2009). In 2012, more than 80 agencies accredited more than 7,800 colleges and universities and more than 20,000 programs (Eaton, 2012). This system of nongovernmental compliance organizations is uniquely American. Locating the responsibility for the quality of education across three entities and not solely in the hands of the federal government ensures a level of autonomy for institutions of higher education (ASPA, 2013a). Middaugh (2012) states that the “financial aid ‘gatekeeper’ role has been an interesting odyssey. Quality assurance in higher education—in other words, accreditation—is built on a completely different premise in the United States than anywhere else in the world” (p.5).

The solid connection between the federal monies and accreditation was then established. As the amount of federal financial aid increases, so does the amount of federal regulation of accreditors as they are defined as the “reliable authority” on quality

(Eaton, 2012, p.1). There is an increasing role of the federal government in accreditation and a belief by the public that institutions should be accountable for quality of education (Sandmann, Williams, & Abrams, 2009). As a result, regional accrediting organizations have increased their requirements and upgraded their standards and procedures in order to make them more rigorous (Sibolski, 2012). They regularly review and revise their own standards and processes, and have addressed the assessment of effectiveness through evidence such as student learning outcomes since the 1990's (Sibolski, 2012). The focus on student outcomes will be addressed in a later section of this literature review.

**Specialized Accreditation.** Accrediting organizations fall into three categories: national, regional, and programmatic, i.e., specialized (Eaton, 2012, p.1). Specialized accrediting organizations evaluate institutions with a single purpose. Specialized accreditation gained popularity through the 20<sup>th</sup> century (CHEA, 1998). By 1939, the predecessor of the Department of Education recognized 16 specialized accreditors. Today, there are 40 specialized accrediting agencies recognized by the U.S. Department of Education (CHEA, 2014). Specialized or programmatic accreditation normally applies to programs, departments, or schools that are parts of an institution. Most of the specialized accrediting agencies review units within an institution of higher education that is already accredited by one of the regional accrediting agencies. However, certain accrediting agencies also accredit professional schools and other specialized institutions of higher education that are freestanding in their operations. Thus, a specialized accrediting agency may also function in the capacity of an institutional accrediting agency (USDE, 2014; ASPA, 2013c).

Specialized accreditation, perhaps because of its controversial nature, has received considerable attention in the literature (Hill, 2012; Kyriakos, 2009). Specialized bodies grew rapidly after the American Medical Association published its first list of approved medical programs. The American Dental Association and the American Bar Association first accredited programs in 1918 and 1923, respectively (Brittingham, 2009). Some administrators have suggested that the growth of specialized accrediting bodies continues since 40 are now recognized by CHEA. However, some of this growth reflects the development of new professions such as computer science. Moreover, some of the accrediting bodies recently recognized by CHEA have been operating for 25 years. The perceived trend toward proliferation has caused negative comment by some leaders in higher education who argue that specialized bodies serve no useful purpose (Glidden, 1996). Uehling (1987) suggests that the rapid growth of specialized bodies can be especially troublesome to large research institutions that offer a number of professional programs. Large institutions of this type can end up being accrediting by over 30 different accrediting bodies (Uehling, 1987), which can be a time-consuming and expensive process.

Traditionally, specialized accreditation standards are established based upon criteria determined by educators and practitioners in the field. The standards of best practice are developed by experts in the field in consultation with communities of interest (ASPA, 2013c). These criteria usually include a review of the program organization, administration and governance; a review of faculty qualifications, teaching loads, and student/faculty ratios; a review of program admission criteria and student retention; a review of the curriculum; a review of physical facilities and equipment; and a review of



financial resources (CHEA, 2014). The goal of specialized accreditation is to uphold standards, or best practices, that the profession believes are in the best interest of the student, society, and the field itself. In specialized accreditation, these peer reviewers are senior academics and practitioners in the discipline. Specialized accreditation reviewers are highly qualified for their review assignments and are intensively trained in the agency's standards and to validate both the content of and the issues raised in the self-study (ASPA, 2014).

Uehling (1987) believes that specialized bodies have increasingly become advocates for a particular discipline, often at the expense of the total institution. Both Uehling (1987) and Davies (1987) see institutional accreditation as stressing minimum standards and specialized accreditation as stressing maximum standards. On the other hand, specialized accrediting bodies perform a crucial function because they tend most often to deal with professions that have a direct bearing on health, safety, and the public welfare (ASPA, 2013a). More significantly, however, they serve as guardians of the quality of education which prepares students to become practicing professionals as accreditation by programmatic, specialized organizations serves for licensure and credentialing purposes.

**A Specialized Accrediting Agency for English Language Programs.** The Commission on English Language Program Accreditation (CEA) began as a specialized accrediting agency in 1999; it was created as a means for English language programs to continuously improve quality and comply with standards of best practice (Commission on English Language Program Accreditation, 2014c). In 2003, the U.S. Secretary of Education recognized the Commission as a national accrediting agency for English

language programs and institutions. The Commission remains the only specialized accrediting agency for English language programs and institutions in the U.S. In 2005, the agency revised its mission to include the review and accreditation of English language programs outside the U.S. (Commission on English Language Program Accreditation, 2014c).

All accrediting organizations create and use a set of specific standards which serve as a threshold of quality and continuous improvement (Eaton, 2011; ASPA, 2014a). These standards address key areas such as academic quality, accountability, finance and facilities, curricula, and student learning outcomes. All accreditors, including CEA, follow similar processes for accreditation: a self-review by the institution or program, an onsite visit by a trained review team of peer experts, and a decision by the accrediting organization, agency, or commission (CHEA, 2006; ASPA, 2014b).

The standards for English language programs and institutions published by CEA consist of 44 individual standards across 11 standard areas. They were crafted by a committee of subject area experts and are based on the standard areas required by the U.S. Department of Education regulations for accrediting agencies in order to be recognized by that federal department (CEA, 2014a). Standard areas include mission, curriculum, faculty, facilities, administrative and fiscal capacity, student services, recruiting, length and structure of program, student achievement, student complaints, and program development (CEA, 2014a). The standard areas with the largest number of individual standards are administrative and fiscal capacity with 12 individual standards and student services with eight individual standards. The standard areas with the least number of individual standards are mission; facilities, equipment, and supplies; and

student complaints, which each have one standard (CEA, 2014a). In a study comparing explicit language in the standards of 10 specialized accrediting agencies, Hagerty and Stark (1989) identified the following dimensions of standards: Mission and Goals, Faculty, Students, Curriculum and Educational Programming, Program Administration and Governance, Resources and Facilities, and Evaluation. All of these dimensions are included in the CEA set of 11 standard areas.

**Accreditation of English Language Training Programs Act.** In 2010, the federal government of the U.S. passed the Accreditation of English Language Training Program Act mandating that any English as a Second Language (ESL) training program of study that is certified to issue documentation for international students to enter the country on a student visa be accredited by a recognized accrediting agency (USICE, 2014). This Act applies to all institutes offering ESL: stand-alone ESL schools which offer only ESL programs of study, campus-based programs which are parts of institutions of higher education, and schools which offer ESL in addition to other programs of study. Under this law, a stampede of English language training schools began the accreditation process with agencies recognized by the U.S. Department of Education (Fischer, 2012). While there are two agencies which can accredit English Language Training programs, the USDE recognizes only one specialized accrediting agency for ESL programs of study: the Commission on English Language Program Accreditation (CEA).

The U.S. government is not the only entity which distinguishes between the two models of English language training programs; CEA identifies and issues accreditation to programs (which are campus-based) and institutions (stand-alone ESL schools which are not formally part of another postsecondary institution of higher education). Intensive

English programs located within universities are categorized as programs and receive programmatic accreditation from CEA; those independent, stand-alone schools, which also may be physically located on college campuses, are categorized as institutions and receive institutional accreditation from CEA.

### **Theoretical Framework**

**Quality and Excellence in Education.** Several theorists and practitioners have examined how quality and excellence in higher education are defined and measured. Astin (1985) identifies four traditional, conventional ways of defining and measuring excellence in educational quality. These include examining the reputation, resources, content, and outcomes of an institution or program. In his book, *Achieving Educational Excellence* (1985), however, Astin (1985) proposes, that the best measure of excellence is a concept labeled “talent development,” and that excellence can be seen through impactful educational experiences (p. 61). In the traditional sense, accreditation is employed as a certification of quality and, thus, of excellence, in post-secondary education; it adds to the reputation of an institution, and its processes include a close examination of resources, content, and outcomes.

Quality has been defined as conformance to standards; this implies that if standards are raised, then quality is improved (Harvey & Green, 1993). Quality as perfection, or quality as consistency, also involves conformance to specifications which are ideally measurable (Harvey & Green, 1993). Quality as fitness for purpose is the most common definition of quality employed in higher education, as it involves looking at the institution’s mission and examining all activities and endeavors by alignment and fit with the mission (Harvey & Green, 1993). Accrediting agencies apply the quality as ability to

meet standards, and quality as consistency theories; however, the most prevalent theory of quality which can be applied to accreditation activities is that of goodness of fit for purpose (Vander Hoek, 2012). Accrediting agencies examine an institutions activities through the lens of the mission, whether they are examining at a national, regional, or programmatic level.

**Theory of Quality Control and Benchmarking.** Accreditation processes and the best practices they aim to measure are major methods of quality control management and quality assurance. Prior to the evolution of modern benchmarking processes, the focus of the quality movement was in industry, and it was begun by W. Edwards Deming. Deming's work dates to the 1950's, and his culture of Total Quality Management (TQM) was originally likened to a quality inspector whose job was to find faulty parts and equipment (Thalner, 2005). The focus of TQM, however, was an organization-wide focus on creating a culture of quality goods and services (Glenn, 2009; Thalner, 2005). TQM can be defined as a management approach to long-term success through customer satisfaction. In TQM, every member of the organization participates in improving quality, service, products, and thus customer satisfaction. The primary elements of TQM involve a focus on the customer, total involvement by the employees, an integrated system, fact-based decision making, focus on communications, and a strategic approach (Glenn, 2009; Thalner, 2005). Spangehl (2012) reports that academics "ridiculed" (p. 33) these ideas as fads and "rejected them without exploring what they had to offer" (p. 33). However, Spangehl, who serves as vice president for accreditation relations at the Higher Learning Commission (HLC), admits that the HLC's Academic Quality Improvement Program

(AQIP) was designed with these same quality assurance processes and procedures in mind (2012).

Benchmarking, defined as “the use of standards or references by which other objects or actions can be measured” (Levy & Ronco, 2012, p.5), is a strategic approach whereby organizations identify opportunities for improvement. The emphasis in benchmarking is on procedures and practices rather than on metrics. The Xerox Corporation is often credited with starting the first comprehensive benchmarking project in the late 1970’s (Yasin, 2002). They used efforts to learn about the materials, processes, and methods used by other photocopier manufacturers and apply these lessons; this competitive benchmarking allowed Xerox to improve their processes and efficiency, thus leading to development and evolution of a new management tool: process benchmarking (Yasin, 2002). Benchmarking is used in TQM, and it is seen as a way to improve performance and delivery of quality to a variety of customers but also as a way to identify opportunities for improvement and efficiencies (Levy & Ronco, 2012).

In the mid-1980’s, then-Secretary of Commerce Malcolm Baldrige was an advocate of quality management as a key to prosperity and sustainability in the U.S. The initiation of the Malcolm Baldrige National Quality Award (MBNQA) in 1988 positively influenced the proliferation of benchmarking in the USA (Yasin, 2002). The MBNQA is presented annually by the President of the United States to organizations that demonstrate quality and performance excellence. Since 1999, the field of education has been one of the six categories in which awards may be given. Selection criteria for the award include leadership, strategic planning, customer and market focus, measurement, human resource focus, process management, and organizational performance results citations. One of the

impacts of the award has been initiating and sustaining benchmarking processes within an organization. Each year, thousands of institutions and organizations use the award criteria as a comprehensive process improvement framework (Yasin, 2002).

Benchmarking in higher education began in the 1990's as a way to create networks of communication, overcome resistance to change, and provide structure for external evaluation, i.e., accreditation (Levy & Ronco, 2012). In a 1995 issue of the AAHE Bulletin, Marchese (1995) writes about *Understanding Benchmarking*. One of the most important benefits of benchmarking in higher education is that it highlights problem areas and the potential for improvement, provides incentive to change, and assists in setting targets and formulating plans and strategies (Alstete, 1995). The findings from benchmarking enable universities to prioritize resources and use their resources to best effect (Alstete, 1995). Recently, there has been more emphasis placed on providing substantial data-driven evidence of quality and effectiveness in achieving the mission and goals of the institution. To the public this demonstrates accountability and stewardship of resources (Baker, 2002).

**Accountability in Higher Education.** As previously noted, the growth of higher education in the United States in recent decades has been characterized by a push for increased access to education, the rise of new institutions, and increasing public scrutiny of the cost and value of education in general (USDE, 2006). Within the context of accreditation, there have been increasing concerns about the growth of accreditation commissions, including the expanding process of preparation and reporting required by institutions to comply with more specific accreditation standards, as well as the expanding scope of accreditation on the national stage (Eaton, 2001). Accountability has

emerged as a summative term for the rise of interest in the return on investment given by education (USDE, 2006). Combined with forces in the commercial sector, public arena, and the academy itself, the push for greater accountability has continued to grow.

In the book, *Achieving Accountability in Higher Education*, Burke (2004) details how different forces have vied for predominant power in the history of higher education. These competing forces include “state priorities, academic concerns, and market forces” (Burke, 2004, p. 19). This triangle of accountability gives shape to competing pressures and tensions. Accrediting agencies have been employed to pursue federal policy objectives since their beginnings, so the new trend is not, in fact, new (Burke, 2004). As federal support for higher education grows, and the importance of credentials plays a role in individual and national well-being, demands will continue to be placed on accreditors.

In a themed issue of *Planning for Higher Education* (PHE) dedicated to Accreditation in Higher Education, Hartle (2012) asks whether accreditors can continue to play a central role in public policy. Today, accreditors must find a balance between the interests of the institutions and the interests of the public (or the federal government). However, that was not always the case in the past as accreditors served institutions more than the public. Hartle (2012) describes the central challenge to higher education accreditors as balancing public demands for accountability and transparency while maintaining academic practices and standards.

In that themed issue of PHE, Middaugh (2012) recognizes the louder and louder calls for accountability in regards to federal financial aid, and identifies the response of colleges as a movement towards outcomes-based evidence to comply with accreditation standards. According to Middaugh (2012), that movement is “fraught with peril” (p. 6) as



institutions must identify a language for describing how student learning is assessed, measured, and reported.

Elizabeth Sibolski (2012), president of a regional accrediting commission, recognizes that initially the accrediting agencies focus was on quality and institutional improvement; however, she also states that these agencies are fast becoming responsible for “increasingly granular and intrusive regulatory and compliance-based” (p. 26) activities at institutions seeking to be accredited. She reports the result is that some institutions are discontented with accreditors and that there is growing tension between the original quality improvement processes involved in accreditation and the compliance-based requirements imposed by the federal government. Sibolski suggests that professionals in the field of higher education must recognize these tensions, seek balance between the pressures on an institution and accrediting agency, and focus on the broader context of quality improvement and focus on student's best interests (2012).

Accountability, as a presence in U.S. higher education, appears to be “here to stay” (Burke, 2004, p. 24). Indeed, the concept of tensions between competing forces—the simultaneous intersection of the forces in the accountability triangle and the interplay between accountability, assessment, and accreditation can be used as lenses to understand the deep history and complicated nature of accreditation. As the accountability aspects of accreditation became more common, the formerly voluntary nature of accreditation took on aspects of regulated, required compliance (Kuh & Ikenberry, 2009). The preeminence of concerns with accountability at work upon accreditation also lead to conditions of ongoing change and evolving standards (Lubinescu, Ratcliff, & Gaffney, 2001).

Crosson (1987) suggests that the outcomes of an accreditation visit are not always clearly understood. The prospect of a visit from an institutional or specialized accrediting team usually causes a great deal of activity for a year or more prior to the scheduled visit, often requiring reorganization of institutional priorities for faculty and administrators. Unfortunately, not only does the activity often subside after the team's visit to the campus, but the potential benefits to the institution as a result of the self-study and consultation by team members may not be realized. For that reason, accrediting bodies now monitor institutions and programs through annual and interim reports. These efforts make accreditation a process of continuous compliance and improvement (CHEA, 2014).

Judith Eaton, president of CHEA, has commented about the upcoming 2014 reauthorization of the Higher Education Act specifically about accountability.

As of now, the most likely result of the next reauthorization is continued expansion of legislation and regulation that sustains government control. This means more direct government authority over the operation of accrediting organizations – their standards, policies and processes. It means the continued growth of federal review of individual institutions, in addition to accreditation. It means the federal government expanding its influence in the defining and judging of academic quality. (Eaton, 2013, p.1)

A recent blog post on the U.S. Department of Education website (Kanter, 2013) describes efforts to strengthen the accreditation process and focus more on "what students know and can do" and clearly outlines the attention paid to student learning outcomes. This has effects not only on the institutions who are seeking accreditation, but on the organizations granting accreditation. For accrediting agencies to become and continue to be recognized by the U.S. Department of Education, they will need to meet criteria refocused on quality of student learning, with an additional focus on effort on quality enhancement (i.e., improvement) and value (i.e., affordability) (Kanter, 2013).

**Student Learning Outcomes Assessment.** The focus on student learning outcomes is not recent. Bloom's Taxonomy of the Cognitive Domain was created in 1948 by psychologist Benjamin Bloom and a group of colleagues as a way to categorize educational goals for student performance while focusing on three domains: cognitive, affective, and psychomotor, and it is still in use today (Krathwohl, 2002). The cognitive domain entails knowledge recall or recognition and the development of intellectual skills (Krathwohl, 2002). Bloom's taxonomy identifies six levels within the cognitive domain which often appear in the form of a pyramid with the simplest cognitive skill at the base and more complex skills at the peak. Specifically, at the base is the ability to recall or the recognition of knowledge; while at the peak is the ability to evaluate knowledge or information. In the pyramid, the six levels from base to peak are knowledge, comprehension, application, analysis, synthesis, and evaluation (Krathwohl, 2002). The taxonomy was designed to be a classification of student behaviors, or performances, and represent the outcomes of student learning and the education process (Krathwohl, 2002). As the taxonomy classifies student behaviors or performance outcomes, it was a precursor to outcomes-based assessment in higher education today (Ewell, 2009).

The outcomes assessment movement in higher education had its beginnings in 1985. College student development theory began earlier than that, and the general development of morals and attitudes, as well as cognitive gain, were the subject of many studies (Ewell, 2002). In the 1960's and 1970's, program evaluation and review was on the rise in higher education, and there was a quantitative focus on strategic planning and budgeting. Attention turned to student outcomes and identifying and quantifying them in order to provide data for strategic decision-making (Ewell, 2002).

Today, the quality of undergraduate education is of great interest to a variety of audiences; lawmakers, parents, and employers join accreditors and are just a few of those who demand to know what students are learning and what they can do (Kuh & Ikenberry, 2009). Policymakers and leaders in higher education have stressed the importance of outcomes of college. In the early 1990's, the National Education Goals Panel identified collegiate learning objectives; furthermore, their report suggested that valid and reliable assessments to track these objectives be developed (Ewell, 2002). These proposed nationally mandated objectives and assessments were not imposed; however, the report stimulated a focus on both general collegiate learning outcomes and a system of assessment that would respond to calls for accountability and compare with international efforts already in existence (Ewell, 2002).

### **Current Empirical Research**

**Student Learning Outcomes Focus.** Pressures for increased accountability have been accompanied by increased emphasis on the assessment of student learning (Bers, 2008; Spangehl, 2012). Critics of accreditation have pointed out that being accredited does not necessarily say anything about the student outcomes associated with that college or university (Huffman & Harris, 1981); furthermore, it is less and less a sign of distinction for institutions that are well-operated (Spangehl, 2012). While concern for student outcomes is a genuine interest of faculty, administrators, and students already in an institution of higher education, the legacy of the accountability debate has been the most forceful proponent in increasing the emphasis upon this form of quality improvement as an outward accountability measure that adds to the overall meaning of accreditation (Eaton, 2009). In the context of accountability, assessment of student

outcomes serves the purpose of being a marker of institutional performance, linking the stamp of accreditation to something that implies actual student learning issues (Driscoll & De Norriega, 2006).

Outcomes-based education has grown in popularity due to public concern about what and how much students are learning, and concern over who is responsible for educational quality. Demands by the public for accountability in higher education dates back to the mid-1980's (Rudolph, 1990). The focus on educational accountability and the use of outcomes as measurement finds its roots in K-12 education (Hargreaves & Moore, 2000). A mounting unease with the academic community shifted its focus to higher education (Hargreaves & Moore, 2000). While few universities were performing process benchmarking, or applying essentials of total quality management, they began to employ the use of performance indicators and performance funding. The use of performance indicators ignores the processes behind the metrics (Levy & Ronco, 2012); it focuses on quick measurement and data collection.

**Accreditation and Student Learning Outcome Assessment.** Before the 1980's, accreditation standards were not focused on student outcomes, but on processes and procedures that were believed to produce educated, prepared students. Indeed, higher education accreditors are increasingly switching emphasis from teaching methodology and curricular objectives to student learning outcomes (Hill, 2012). As the focus and conversation within higher education switched to results, outputs, and outcomes, the accrediting agencies, especially those in specialized and professional fields, have consciously incorporated outcomes into both their standards and review procedures (Davenport, 2001).

In 1988, the federal government became involved in student learning outcomes when the U.S. Department of Education issued an order requiring all federally approved accrediting bodies to include a measure of institutional and program outcomes in their accreditation standards (USDE, 1988). Initially, some accrediting agencies embraced the concept and adopted institutional effectiveness standards that required explicit evidence of goal attainments and student learning (SACS, 2002; Wright, 2002).

Proponents and opponents of accreditation have found mixed results concerning the rise of student learning outcomes assessment (Kuh & Ikenberry, 2009; Ewell, 2009). On the one hand, institutional leaders have signaled that their commitment to student learning outcomes is motivated by the accreditation process, at large, not the public pressure for increased accountability (Kuh & Ikenberry, 2009), while others have found mixed results in the rationale and practice of prioritizing student learning outcomes (Ewell, 2009). Assessment of student outcomes has already been embedded in the standards of specialized accreditation agencies, and this is used as an argument in favor of the voluntary, non-governmental model (CHEA, 2011). Student learning outcomes and accreditation are now mentioned side-by-side in many studies, signaling the formal embrace of this task within the accreditation cycle (Crow, 2009; Haviland, 2009). Assessment is becoming integrated into institutional activities (Banta, Pike & Hansen, 2009) and has been linked to increased campus awareness of educational outcomes and improvement processes constructed to address them (Volkwein, Lattuca, Harper, & Domingo, 2007).

In a study examining the relationship between educational excellence and accreditation standards, Hagerty and Stark (1989) compared accreditation standards

across professional fields to compare standards to faculty preferred and actual student outcomes. At the time of the study, in 1989, few specialized accrediting agencies made outcomes explicit in their standards. Dimensions with strong emphasis in the wording of the standards included: mission and goals, faculty, students, curriculum, administration and governance, resources and facilities and evaluation (Hagerty & Stark, 1989). Garrity and Finney (2007) hypothesized that accrediting agencies in licensed disciplines would have a stronger emphasis on and more explicit standards on student learning outcomes than non-licensed disciplines. The results of their 2007 study demonstrate that all of the accrediting bodies whose standards were examined placed a minimal amount of emphasis on outcomes. They did, however, place heavy emphases on curriculum, educational programming, program administration and governance. It was expected that outcomes would be of importance in the wording of the accreditation standards; however, this was not found to be the case. None of the standards contained a list of specific skills expected of graduates of programs (Garrity & Finney, 2007). Accrediting agencies and their standards focus on measures of inputs, procedures, and processes to be used in conjunction with measures of outcomes in accreditation decisions (ASPA, 1995). The low level of emphasis placed on explicit outcomes in accreditation standards language may be intentional, suggest Garrity and Finney (2007), as it is the responsibility of faculty to determine course and program content. They also suggest, however, that “accreditors may place a heavier emphasis on outcomes assessment in their accreditation decisions than in their written standards” (p. 11).

Today, accrediting agencies have been tasked by the federal government and the Council for Higher Education Accreditation with an obligation to establish a threshold for

attention to student outcomes (Eaton, 2011; Beno, 2004; Ewell, 2001). They have a responsibility for framing and using their standards to ensure that institutions set expectations of student achievement, provide evidence of student achievement, inform the public of what students achieve, and use the evidence of student achievement to improve (Eaton, 2011). The organizations have set standards that establish expectations and require compliance of institutions in setting and measuring student learning outcomes.

In a case study of student learning outcome assessment and regional accreditation practices, Provezis (2010) found both similarities and differences in regional accreditors' practices related to SLO assessment. Significant to the current study is the fact that Provezis (2010) found "regional accreditors are citing deficiencies in student learning outcomes assessment with increasing frequency" (p. 175). Regional accreditors reported that they are demanding more in the area of student learning outcomes; they also stated that institutions are not meeting the accreditation expectations (Provezis, 2010). In other words, they are receiving more recommendations and more requirements related to student learning outcomes assessment from the accrediting agencies. Provezis concludes that the inability of institutions to fully meet the standards and expectations of the accrediting body related to student learning assessments affects the accreditation decision, and that "often, institutions do not receive the ten year re-accreditation cycle, but a shortened one" (p. 198) due to deficiencies in the area of student learning outcomes assessments.

Important to the rationale for this study is the fact that there is empirical evidence that accrediting agencies focus significantly on student learning outcomes assessment in



their accreditation decisions; in other words, SLO assessments weigh heavily on accreditation decisions. According to a National Institute for Learning Outcomes Assessment report, regional accrediting agencies cited between 60% and 80% of institutions for deficiencies, most often in the area of outcomes assessment (NILOA, 2012). Furthermore, in an examination of accreditation letters posted on institution websites, NILOA reported that 90% contained requests for follow-up related to student learning outcomes assessment or activity (NILOA, 2012).

## **Chapter 3: Methods**

### **Target Population**

The target population for this study is any intensive English programs in the United States seeking initial accreditation by the Commission on English Language Program Accreditation. This group includes programs with a “direct reporting line” (CEA, 2014a, p.1) within universities and colleges, including community colleges, that are accredited by a regional or institutional accrediting body. These programs apply for programmatic accreditation from CEA. The group also includes stand-alone, independent institutions that offer an intensive English language program. Ownership and governance of these independent institutions vary significantly, and they may be stand-alone, single-owner, multi-site, or located on campuses with a contractual agreement for their services (CEA, 2014a). These schools apply for institutional accreditation by CEA. This study refers to these two categories of English language teaching units as sites or schools.

### **Sample**

This sample consists of the 133 programs and institutes granted initial accreditation of one-year or five-years by CEA during the specified time period. This group was selected because these are the two accreditation types which CEA awards in the United States. When CEA accredits intensive English programs, they award either programmatic accreditation (for university-based programs) or institutional accreditation (for independent institutions). This distinction is made during the application process completed by the school seeking accreditation. This information is also included on the accreditation decision letter. This time period was selected because it is the period immediately following the enactment of the Accreditation of English Language Training

Programs Act of 2010. The Act began requiring English language schools to be accredited in order to be approved to admit foreign students (USICE, 2014; Fischer, 2012).

During this period, a total population of 140 intensive English schools was awarded initial accreditation by CEA; 7 were international sites. The remaining 133 are sites within the U.S. that received either one-year or five-year accreditation (CEA, 2014c). That group of programs which received initial accreditation, either one-year or five-year, will be examined in this study. A power analysis to determine sample size was performed. For an anticipated effect size (Cohen's  $d$ ) of .4, a desired statistical power level of .8, and a probability level of .05, the minimum sample size for a one-tailed test is 156, while for a two-tailed test, the minimum sample size is 200.

### **Data Collection**

Data for this study were retrieved from accreditation decision letters and findings from review team reports that contain a standards checklist. Findings are categorized into the following three categories of compliance: "*appears to meet*," "*appears to partially meet*," and "*appears not to meet*" (CEA, 2014a, p.23). The data were obtained directly from the Commission on English Language Program Accreditation (CEA), where data for accreditation decisions are collected, and they were compiled for the purposes of this study. CEA collects the data for each accreditation decision. The Executive Director of CEA agreed to provide the de-identified commission's data for the purposes of this study.

Of 11 CEA standard areas, findings on the seven individual standards relating to student learning outcomes, prepared and produced by the peer review site visit team at the culmination of the visit, were used for the current study. Specifically, each review

team report contained a standards checklist with a finding for each of the 44 CEA standards in all 11 standard areas. Those findings included a decision by the team as to whether the school appeared to meet, appeared to partially meet, or appeared not to meet each individual standard. Accreditation decision letters prepared by the commission are sent to the schools once an accreditation decision is made.

The research questions that guide this study are as follows:

1. What is the relationship, if any, between the accreditation type (programmatic versus institutional) and the length of accreditation awarded (one-year versus five-years)?
2. What is the relationship, if any, between review team findings of compliance (the ability to meet, partially meet, or not meet) on standards related to student learning outcomes and the accreditation award length?
3. What is the relationship, if any, between accreditation type and review team findings of compliance for the standards identified as relating to student learning outcomes and assessment?
4. What is the relationship, if any, between review team findings of meeting, partially meeting, or not meeting individual standards identified as relating to student learning outcomes; accreditation type; and length of accreditation awarded by the Commission on English Language Program Accreditation?

## **Standards**

Seven standards that were used for this study are in the standard areas of Curriculum, Length and Structure of Program of Study, Student Achievement, and

Program Development, Planning, and Review (CEA, 2014d). Specifically, the seven standards whose findings were examined included the following:

- **Curriculum Standard 2 (*Written Learning Outcomes*)**: Course goals, course objectives, and student learning outcomes are written, appropriate for the curriculum, and aligned with each other (CEA, 2014a, p.9). For the purposes of this study, this standard is referred to and described as *Written Learning Outcomes*.
- **Length & Structure of Program Standard 2 (*Program Structure*)**: The program or language institution's curricular design clearly indicates the levels of instruction and specifies how students progress through a full program of study (CEA, 2014a, p.13). For the purposes of this study, this standard is described as *Program Structure*.
- **Student Achievement Standard 1 (*Placement Testing System*)**: The program or language institution has a placement system that is consistent with its admission requirements and allows valid and reliable placement of students into levels (CEA, 2014a, p.13). For the purposes of this study, this standard is referred to as *Placement Testing System*.
- **Student Achievement Standard 2 (*Assessment Instruments and Procedures*)**: The program or language institution documents in writing whether students are ready to progress to the next level or to exit the program of study, using instruments or procedures that appropriately assess the achievement of student learning outcomes for courses taken

within the curriculum (CEA, 2014a, p.13). For the purposes of this study, this standard is described as *Assessment Instruments and Procedures*.

- **Student Achievement Standard 3 (*Grade/Progress Reporting*):** The program or language institution maintains and provides students with written reports that clearly indicate levels of language proficiency attained as a result of instruction (CEA, 2014a, p.13). For the purposes of this study, this standard is referred to as *Grade/Progress Reporting*.
- **Student Achievement Standard 4 (*Assessment Reporting*):** The program or language institution informs students of the assessment procedures used to determine placement, progression from level to level, and completion of the program, as well as their individual results (CEA, 2014a, p.13). For the purposes of this study, this standard is described as *Assessment Reporting*.
- **Program Development, Planning, and Review Standard 2 (*Written Review Plan*):** The program or language institution regularly reviews and revises its program components and has a plan, in writing, to guide the review of curricular elements, student assessment practices, and student services policies and activities. The plan is systematically implemented (CEA, 2014a, p.14). For the purposes of this study, this standard is referred to as *Written Review Plan*.

Each of the above standards, while located in different standard areas (e.g., Curriculum, Length and Structure of Program), is related to student learning outcomes and the assessment of such outcomes as evidenced by the wording of the standard or the wording of the context and discussion for that standard in the agency's handbook and

materials (CEA, 2014d). The context and discussion for each of the standards describes in greater detail the relationship and relevancy of each standard to student learning outcomes and assessment (CEA, 2014d).

### **Measures**

In alignment with the research questions for each standard, the following categorical variables were analyzed: accreditation type, accreditation length, and findings for each of the seven standards related to student learning outcomes and assessment. All of the data were categorical. The null hypothesis is that there was no relationship between variables.

**Findings.** One of the variables in the study is the determination of compliance in the review team report for each of the seven standards described above. This variable is referred to as *findings*. There are three levels for this nominal variable, and the value labels for this variable were: 1=appears to meet, 2=appears to partially meet, and 3=appears not to meet.

**Accreditation Type.** Accreditation type was a nominal variable with two levels: programmatic and institutional. The value label for this variable was 1=programmatic and 2=institutional.

**Accreditation Length.** Another variable, accreditation length, is a nominal variable that has two levels: one-year or five-year. The value label for this variable was 1=one-year and 2=five-year.

**Measure Summary.** Table 1 summarizes the three categorical variables used in the current study.

Table 1

*Multiway Frequency Analysis Coding Scheme*

Categorical Variables			
<b>Name</b>	<b>Description</b>	<b>Measurement Level</b>	<b>Value Label</b>
TYPE	Accreditation Type	Nominal	1=programmatic 2=institutional
LENGTH	Accreditation length	Nominal	1=one-year 2=five-year
FINDING	Review Team Report finding of compliance with standard	Nominal	1=appears to meet 2=appears to partially meet 3=appears not to meet

**Data Analysis**

A log-linear model (Tabachnik & Fidell, 2007) was used to investigate the association between accreditation length, accreditation type, and findings reflecting ability to meet standards related to student learning outcomes. A log-linear model is a nonparametric statistical procedure for discrete variables with two or more levels. It is an extension of the chi-square for goodness-of-fit technique and results in a model of expected cell frequencies that predicts the observed cell frequencies and uses the most conservative number of variables (Tabachnik & Fidell, 2007). When two or more categorical variables are examined for relationship to one another, a multiway frequency table is formed.

A hierarchical log-linear model explores which variables are associated with one another. It will suggest whether all of them are related, if some are related to others, and if all are independent and not related or associated. If some are associated, one may be able to predict outcomes based on those associations. Multiway frequency analysis



(MFA) usually involves three steps: screening, choosing and testing models, and evaluating and interpreting the selected model (Tabachnik & Fidell, 2007).

For each standard, a separate log-linear model was performed, resulting in a total of seven log-linear models. From a log-linear model for each standard, the significances of the main effect, two-way interactions, and three-way interactions were first tested. For the significant effect found in a log-linear model, the odds of the focal event were compared between groups so as to describe the pattern of the significant relationships between variables.

Several assumptions for MFA include random assignment; discrete, categorical measures; and independence (where each case is a member of only one cell on the table). The expected frequencies are more than one for all cells in the table; further, no more than 20% of cells have expected frequencies less than five. There should be at least five times as many cases as cells, which is true in this study as the cases are 2 x 2 x 3.

## **Chapter 4: Results**

The Statistical Package for the Social Sciences (SPSS) (IBM Corp., 2013) was used to analyze the data obtained from the Commission on English Language Program Accreditation. The descriptive statistics of the variables were first summarized, followed by results from the log-linear analysis to examine the relationships among three variables: accreditation type (programmatic vs. institutional), initial accreditation length awarded (1-year vs. 5-year), and findings of apparent compliance for each of seven standards related to learning outcomes and assessment (appears to meet vs. appears to partially meet vs. appears not to meet). This was followed by the comparison in the odds of observing the focal event of a variable between two distinct subcategories of the other variable so as to describe the significant relationship(s) found in the log linear analysis.

### **Number of Sites Included in the Study**

During the period under the examination for this study, April 2012 through December 2014, 190 sites were examined for accreditation by the Commission on English Language Program Accreditation. Of those 190 sites, 133 were determined to be eligible for this study in that they met the qualifications set by this study and described in the methods chapter (p. 34). To be more explicit, those 133 sites are programs or institutions located in the United States that were awarded either 1-year initial or 5-year initial accreditation between April 2012 and December 2014. The other 57 sites (out of a total of 190 sites) consisted of 25 (13%), which were denied accreditation, 10 (5%), which were issued 1-year reaccreditation, 15 (8%), which were issued 10-year reaccreditation, and 7 (4%), which were international sites. Thus, the dataset for this study included 133 sites (70%) that met the inclusion criteria.

### Frequency of Sites by Accreditation Type and Initial Accreditation Length

Table 2 shows the frequency of sites summarized by accreditation type (programmatic vs. institutional) and initial accreditation length (1-year vs. 5-year). More sites received a term of 1-year accreditation during the time period identified. Specifically, 76.7% ( $n=102$ ) of the 133 sites received 1-year accreditation, while 23.3% ( $n=31$ ) of the 133 sites were awarded 5-year initial accreditation.

Table 2

#### *Accreditation Type and Accreditation Length Cross Tabulation*

<u>Accreditation Type</u>	Institutional	<i>n</i>	Accreditation Length		
			1-yr initial	5-yr initial	Total
			87	20	107
		% within Type	81.3%	18.7%	100.0%
		% within Accreditation Length	85.3%	64.5%	80.5%
		% of Total	65.4%	15.0%	80.5%
	Programmatic	<i>n</i>	15	11	26
		% within Type	57.7%	42.3%	100.0%
		% within Accreditation Length	14.7%	35.5%	19.5%
		% of Total	11.3%	8.3%	19.5%
<u>Total</u>		<i>n</i>	102	31	133
		% within Type	76.7%	23.3%	100.0%
		% within Accreditation Length	100.0%	100.0%	100.0%
		% of Total	76.7%	23.3%	100.0%

Most of the initial accreditation decisions that were made during the period between April 2012 and December 2014 were for institutional accreditation. Of the 133 valid initial awards, 80.5% ( $n = 107$ ) were institutional and 19.5% ( $n = 26$ ) were programmatic accreditations. Of those institutional accreditations, 81.3% were 1-year in length while 18.7% were 5-year in length. Of the programmatic awards, 57.7% were 1-year decisions, and 42.3% were 5-year decisions.

Most of the accreditation decisions made were 1-year in length; 76% of the initial accreditation decisions made during the specified time period examined by this study were 1-year awards. Less than 25% of the initial decisions were for a length of five years. Regarding the accreditation decisions, most of the 5-year awards were institutional rather than programmatic; 64.5% of the 5-year accreditations awarded were institutional, with 35.5% of those awards were programmatic. Examination of the one-year accreditation decisions shows that 85.3% of them were institutional and 14.7% were programmatic.

### **Frequency of Sites by Review Team Findings**

Frequencies of sites by review team findings of compliance (i.e., appears to meet, appears to partially meet, appears not to meet) for each of the seven standards under examination for this study were produced. They are described below by each of the seven standards whose findings were reviewed and in order of most frequent to least frequent.

**Assessment reporting.** One of the student achievement standards mandates that the program or language institution inform students of the assessment procedures used to determine placement, progression from level to level, and completion of the program, as well as their individual results. Table 3 shows that more sites were found to comply with this standard than any of the other standards examined. Specifically, of 133 sites, 78.2%

( $n = 104$ ) appeared to meet this standard and 20.3% ( $n = 27$ ) appeared to partially meet this standard. Only 1.5% ( $n = 2$ ) were found not to meet this standard. This standard had the highest percentage of compliance (i.e., findings of appear to meet) when compared to the other six standards' findings.

Table 3

*Standard Findings 1 – Assessment Reporting*

Findings	<i>n</i>	%
Appears not to meet	2	1.5
Appears to partially meet	27	20.3
Appears to meet	104	78.2

**Grade/Progress reporting.** This standard states that a program or language institute maintains and provides students with written reports that clearly indicate levels of language proficiency attained as a result of instruction. Table 4 shows that 12.8% ( $n = 17$ ) of the sites appeared not to meet this standard, and 51.1% ( $n = 68$ ) of the sites appeared to partially meet the standard. Only 36.1% ( $n = 48$ ) appeared to meet the standard. In sum, a combined total of 63.9% were found to not fully meet this standard.

Table 4

*Standard Findings 2 – Grade /Progress Reporting*

Findings	<i>n</i>	%
Appears not to meet	17	12.8
Appears to partially meet	68	51.1
Appears to meet	48	36.1

**Written review plan.** Program Development, Planning, and Review standard 2 states that the program or language institution regularly reviews and revises its program components and has a plan, in writing, to guide the review of curricular elements, student assessment practices, and student services policies and activities. The standard also

mandates that the plan be systematically implemented. More sites were found to be out of compliance with this standard than with any other standard in the seven standards examined. This standard had the largest percentage of findings of partial compliance, and it had a relatively high percentage of findings of incompliance. As shown in Table 5, of 133 sites examined, 33.1% ( $n = 44$ ) were found to meet the standard; 55.6% ( $n = 74$ ) were found to partially meet the standard; and 11.3% ( $n = 15$ ) were found not to meet the standard. Overall, most of the sites examined, 66.9%, appeared not to fully meet this standard.

Table 5

*Standard Findings 3 – Written Review Plan*

Findings	<i>n</i>	%
Appears not to meet	15	11.3
Appears to partially meet	74	55.6
Appears to meet	44	33.1

**Program structure.** Length and Structure of Program of Study Standard 2 states that the program or institution’s curricular design clearly indicates the levels of instruction and specifies how the students progress through a full program of study. As shown in Table 6, more sites appeared to partly meet this standard than to meet it. The percentage of findings of incompliance, or not meeting the standard, also was relatively high (similar to those for the planning and development standard). Specifically, of the 133 sites examined for this study, 39.8% ( $n = 53$ ) appeared to meet this standard; 48.9% ( $n = 65$ ) appeared to partially meet this standard; and 11.3% ( $n = 15$ ) appeared not to meet this standard. According to the cumulative percentage analysis, 60.2% of the sites were found to not fully meet this standard.

Table 6

*Standard Findings 4 – Program Structure*

Findings	<i>n</i>	%
Appears not to meet	15	11.3
Appears to partially meet	65	48.9
Appears to meet	53	39.8

**Written learning outcomes.** The curriculum standard examined in this study states that course goals, course objectives, and student learning outcomes must be written, appropriate for the curriculum, and aligned with each other. As shown in Table 7, of the 133 sites examined, 58.6% ( $n = 78$ ) were found to appear to meet this standard; 36.1% ( $n = 48$ ) appeared to partially meet this standard; and 5.3% ( $n = 7$ ) of the sites were found not to meet this standard. Cumulative percentage analysis demonstrates that 41.4% of the sites were found to not fully meet this standard.

Table 7

*Standard Findings 5 – Written Learning Outcomes*

Findings	<i>n</i>	%
Appears not to meet	7	5.3
Appears to partially meet	48	36.1
Appears to meet	78	58.6

**Placement testing system.** Student Achievement Standard 1 states that the program or institution has a placement system that is consistent with its admission requirements and allows valid and reliable placement of students into levels. Table 8 shows that most of the sites examined in this study were found to meet this standard. Of the 133 sites examined for this study, 69.2% ( $n = 92$ ) appeared to meet this standard, while 25.6% ( $n = 34$ ) partially met the standard, and 5.3% ( $n = 7$ ) did not meet this

standard. This standard was largely met, with a combined total of 30.8% of the sites found not to fully meet this standard.

Table 8

*Standard Findings 6 - placement testing system*

Findings	<i>n</i>	%
Appears not to meet	7	5.3
Appears to partially meet	34	25.6
Appears to meet	92	69.2

**Assessment instruments and procedures.** This standard states that the program or institution documents in writing whether students are ready to progress to the next level or to exit the program of study using instruments or procedures that appropriately assess the achievement of student learning outcomes for courses taken within the curriculum. For this standard, Table 9 shows that 17.3% ( $n = 23$ ) appeared not to meet the standard, 45.9% ( $n = 61$ ) appeared to partially meet the standard, and 36.8% ( $n = 49$ ) appeared to meet this standard. A majority of sites (63.2%) were found not to fully meet this standard.

Table 9

*Standard Findings 7 - Assessment Instruments and Procedures*

Finding	<i>n</i>	%
Appears not to meet	23	17.3
Appears to partially meet	61	45.9
Appears to meet	49	36.8

## Summary

In sum, the standard area titled Student Achievement had both the highest percentage of findings of apparent compliance, but it also had the highest percentage of



findings of apparent noncompliance. The standards which had the highest level of compliance, or findings of appears to meet, were the assessment reporting standard (78%), placement testing system standard (69%), and the written learning outcomes standard (58%). The standards with the highest level of partial compliance, or findings of appears to partially meet, were the written review plan standard (56%), the grade/progress reporting standard (51%), and the program structure standard (49%). Finally, the standards which had the highest level of noncompliance, or findings of appears not to meet, were the assessment instruments and procedures standard (17%), the grade/progress reporting standard (13%), and both the written review plan standard (11%) and the program structure standard (11%).

### **Results from Log-linear Models**

Seven separate log-linear models were performed to examine whether three nominal variables are related to each of the seven standards. Three nominal variables are accreditation type (programmatic and institutional), accreditation decision length (5-year and 1-year), and findings for each standard (appears to meet, appears to partially meet, appears not to meet). In this section, overall findings for each of the seven standards whose findings were examined in this study are first described followed by the comparison of the odds/probabilities between subcategories of the variable for the significant effects.

Any significant interaction found in the log-linear model was discussed based on the comparison of the odds between two subcategories of variables that are significantly related. Results from the log-linear models are described by standard below.

In all of the models below, it was found that the two-way interaction between accreditation type and length of accreditation awarded was significant. Specifically, it was found that the probability of an institutional accreditation being 5-year accreditation is .187, while the probability of an institutional accreditation being a 1-year accreditation is .81. The probability of a programmatic accreditation having a 5-year decision length is .42, while the probability of a programmatic accreditation receiving a 1-year decision length is .58. The odds that an institutional accreditation will receive a 5-year accreditation are .229; the odds of a programmatic accreditation receiving a decision of 5-year initial accreditation are .733. Thus, the odds ratio of a 5-year decision over a 1-year decision between institutional and programmatic is .313. This indicates that the odds of institutional awards being a 5-year decision are 69% less likely than those of a programmatic award.

Table 10

*Frequency of Sites by Accreditation Type and Accreditation Decision Length*

		<u>Accreditation Length</u>		
		1-year initial	5-year initial	Total
<u>Accreditation Type</u>	Institutional	87	20	107
	Programmatic	15	11	26
Total		102	31	133

**Assessment reporting.** A log-linear model on findings regarding assessment reporting (the student achievement standard regarding students being informed of assessment instruments and procedures) indicates that at least one significant main effect ( $\chi^2(11) = 253.669, p < .01$ ), and at least one two-way interaction is statistically significant ( $\Delta \chi^2(4) = 231.076, p < .01$ ). However, no significant three-way interaction was found. In particular, the two-way interaction between findings on the assessment reporting standard

and the accreditation length is statistically significant ( $\chi^2(2) = 13.662, p = .01$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 8.662, p = .01$ ). Because the higher-order effect supersedes the lower-order effect, only the significant two-way interactions – (1) review findings and accreditation length, and (2) accreditation type and accreditation length – are discussed below. Because the significant relationship between accreditation type and accreditation length was discussed above, only the significant relationship between review team findings on assessment reporting and accreditation length is discussed below.

Regarding the relationship between review team findings and accreditation length, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .938, while the probability of receiving a 1-year award while appearing to meet this standard was .719. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decision is 20.333. The odds of meeting this standard over not meeting this standard for a 5-year accreditation decision is 61. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions is 3. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard is 2.811. The odds of appearing to meet this standard over not meeting this standard is 29.8; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions are 10.6.

The odds ratio for meeting this standard over partially this standard between 1 year and 5-year decisions is .138. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 86% less likely when

compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .488. This indicates that the odds of meeting over not meeting this standard for 1-year decisions when compared to 5-year decisions are 51% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is 3.533. This indicates that the odds of partially meeting than of not meeting this standard for 1-year decisions were 3.5 times bigger than those for 5-year decisions.

Table 11

*Frequency of Sites by Accreditation Decision Length and Assessment Reporting*

<u>Accreditation</u> <u>Length</u>		<u>Findings for Assessment Reporting</u> <u>Standard</u>			Total
		appears to meet	appears to partially meet	appears not to meet	
1-year initial accreditation		74.5	26.5	2.5	103.5
5-year initial accreditation		30.5	1.5	.5	32.5
<b>Total</b>		<b>105</b>	<b>28</b>	<b>3</b>	<b>136</b>

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Grade/Progress reporting.** A log-linear model on the student achievement standard regarding grade and progress reports and reporting indicates that at least one significant main effect ( $\chi^2(11) = 159.696, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 126.112, p < .01$ ). In particular, two-way interaction between findings for the grade and progress reporting standard and the accreditation decision was found to be statistically significant ( $\chi^2(2) = 20.575, p = .001$ ). The two-way

interaction between school model and length of accreditation awarded is statistically significant ( $\chi^2(1) = 4.641, p = .05$ ). However, no significant three-way interaction was found. Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be discussed below. The significant relationship between accreditation type and accreditation length regardless of findings was described above, so it will not be provided in this section.

Regarding the relationship between review team findings and accreditation decision, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .661, while the probability of receiving a 1-year award while appearing to meet this standard was .266. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions is 2.047. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions is 43. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions is 21. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard is .470. The odds of appearing to meet this standard over not meeting this standard is 1.571; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions is 3.342.

The odds ratio for meeting this standard over partially this standard between 1 year and 5-year decisions is .229. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 77% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .036. This indicates that the odds of

meeting over not meeting this standard for 1-year decisions when compared to 5-year decisions is 96.4% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is .159. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions when compared to those for 5-year decisions is 1.5 times less.

Table 12  
*Frequency of Sites by Accreditation Decision Length and Grade/Progress Reporting*

		Findings for Grade/Progress Reporting			Total
		Standard			
		appears to			
		appears to meet	partially meet	appears not to meet	
<u>Accreditation</u>	1-year initial accreditation	27.5	58.5	17.5	103.5
<u>Length</u>	5-year initial accreditation	21.5	10.5	.5	32.5
Total		49	69	18	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Written review plan.** A log-linear model on the program review standard mandating a written plan for regular review of curriculum and assessment instruments, processes, and procedures indicates that at least one significant main effect ( $\chi^2(11) = 170.063, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 135.546, p < .01$ ). Again, no significant three-way interaction was found. Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be

discussed below. In particular, two-way interaction between findings for the planning standard and the accreditation length was found to be statistically significant ( $\chi^2(2) = 26.866, p = .001$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 11.198, p = .01$ ); that interaction was described above and will not be addressed here.

Regarding the relationship between review team findings and accreditation length, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard were appears to meet was .631, while the probability of receiving a 1-year award while appearing to meet this standard was .237. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions are 1.782. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions are 41. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions are 23. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard are .386. The odds of appearing to meet this standard over not meeting this standard are 1.581; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions are 4.097.

The odds ratio for meeting this standard over partially meeting this standard between 1-year and 5-year decisions is .216. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 78.4% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .038. This indicates that the odds of meeting over not meeting this standard for 1-year decisions when compared to 5-

year decisions are 96.2% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is .178. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions when compared to those for 5-year decisions is 1.8 times less likely.

Table 13  
*Frequency of Sites by Accreditation Decision Length and Written Review Plan*

		<u>Findings for Written Review Plan</u>			Total
		<u>Standard</u>			
<u>Accreditation</u> <u>Length</u>		appears to	partially	appears	
		meet	meet	not to meet	
1-year initial accreditation		24.5	63.5	15.5	103.5
	5-year initial accreditation	20.5	11.5	.5	32.5
Total		45	75	16	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Program structure.** A log-linear model on the length and structure of program standard regarding appropriate program structure for success on learning outcomes indicates that at least one significant main effect ( $\chi^2(11) = 163.850, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 129.057, p < .01$ ). Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be discussed below. In particular, two-way interaction between findings for the program structure standard and the accreditation length awarded was found to be



statistically significant ( $\chi^2(2) = 27.526, p = .001$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 6.429, p = .05$ ). That interaction was described above and will not be re-addressed here. No significant three-way interaction was found.

Regarding the relationship between review team findings for Length and Structure of Program of Study Standard 2 and accreditation decision, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .754, while the probability of receiving a 1-year award while appearing to meet this standard was .285. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions are 3.267. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions are 49. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions are 15. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard are .504. The odds of appearing to meet this standard over not meeting this standard are 1.903; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions is 3.774.

The odds ratio for meeting this standard over partially this standard between 1-year and 5-year decisions is .154. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 85% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .039. This indicates that the odds of meeting over not meeting this standard for 1-year decisions when compared to 5-year

decisions are 96% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is .252. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions when compared to those for 5-year decisions is 2.5 times less likely.

Table 14

*Frequency of Sites by Accreditation Decision Length and Program Structure*

		<u>Findings for Program Structure</u>			
		<u>Standard</u>			
		appears to	appears to	appears	
		meet	partially meet	not	
		meet	partially meet	to meet	Total
<u>Accreditation</u>	1-year initial	29.5	58.5	15.5	103.5
<u>Length</u>	accreditation				
	5-year initial	24.5	7.5	.5	32.5
	accreditation				
Total		54	66	16	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Written learning outcomes.** A log-linear model on the curriculum standard regarding written and measurable learning outcomes indicates that at least one significant main effect ( $\chi^2(11) = 195.455, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 162.819, p < .01$ ). Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be discussed below. In particular, the two-way interaction between findings for the curriculum standard and the

accreditation length awarded was found to be statistically significant ( $\chi^2(2) = 26.524, p = .001$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 7.583, p = .01$ ) and was described above. Again, no significant three-way interaction was found.

Regarding the relationship between review team findings for written learning outcomes standard and accreditation decision, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .908, while the probability of receiving a 1-year award while appearing to meet this standard was .478. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions are 11.8. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions are 59. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions are 5. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard are 1.065. The odds of appearing to meet this standard over not meeting this standard are 6.6; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions is 6.2.

The odds ratio for meeting this standard over partially this standard between 1-year and 5-year decisions is .090. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 91% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .112. This indicates that the odds of meeting over not meeting this standard for 1-year decisions when compared to 5-year

decisions are 89% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is 1.24. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions were 1.24 times as high as those for 5-year decisions.

Table 15

*Frequency of sites by Accreditation Decision Length and Written Learning*

*Outcomes*

		<u>Findings for Written Learning</u>			
		<u>Outcomes Standard</u>			
		appears to			
		appears to	partially	Appears	
		meet	meet	not to meet	Total
<u>Accreditation</u>	1-year initial				
<u>Length</u>	accreditation	49.5	46.5	7.5	103.5
	5-year initial				
	accreditation	29.5	2.5	0.5	32.5
Total		79	49	8	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Placement testing system.** A log-linear model on the student achievement standard regarding placement testing instruments and procedures indicates that at least one significant main effect ( $\chi^2(11) = 216.475, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 183.339, p < .01$ ). Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be discussed below. In particular, the two-way interaction between findings for the

placement testing standard and the accreditation length was found to be statistically significant ( $\chi^2(2) = 21.125, p = .001$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 7.806, p = .01$ ) and will not be addressed here as it was described in a previous section. Once again, no significant three-way interaction was found.

Regarding the relationship between review team findings for the placement testing system standard and accreditation decision, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .938, while the probability of receiving a 1-year award while appearing to meet this standard was .604. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions are 20.333. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions are 61. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions are 3. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard are 1.866. The odds of appearing to meet this standard over not meeting this standard are 8.333; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions are 4.467.

The odds ratio for meeting this standard over partially this standard between 1-year and 5-year decisions is .092. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 91% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .137. This indicates that the odds of

meeting over not meeting this standard for 1-year decisions when compared to 5-year decisions are 86.3% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is 1.489. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions were 1.5 times as high as those for 5-year decisions.

Table 16  
*Frequency of Sites by Accreditation Decision Length and Placement Testing System*

		<u>Findings for Placement Testing</u>			Total
		<u>System Standard</u>			
		appears to	partially	Appears	
		meet	meet	not to meet	
<u>Accreditation</u>	1-year initial	62.5	33.5	7.5	103.5
<u>Length</u>	accreditation				
	5-year initial	30.5	1.5	0.5	32.5
	accreditation				
Total		93	35	8	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

**Assessment instruments and procedures.** A log-linear model on the student achievement standard regarding assessment instruments and procedures indicates that at least one significant main effect ( $\chi^2(11) = 163.289, p < .01$ ), and at least one of the two-way relationships exist ( $\Delta \chi^2(4) = 111.452, p < .01$ ). Because the higher-order effect supersedes the lower-order effect, only the significant two-way interaction will be discussed below. In particular, two-way interaction between findings for the assessment

instruments and procedures standard and the accreditation length was found to be statistically significant ( $\chi^2(2) = 42.564, p = .001$ ). The two-way interaction between accreditation type and accreditation length is statistically significant ( $\chi^2(1) = 6.387, p = .05$ ); it was described in a previous section. No significant three-way interaction was found.

Regarding the relationship between review team findings for the assessment instruments and procedures standard and accreditation decision, it was found that the probability of an intensive English program receiving an initial accreditation award of 5-years when the findings for this standard are appears to meet was .815, while the probability of receiving a 1-year award while appearing to meet this standard was .227. The odds of appearing to meet this standard over appearing to partially meet this standard for the 5-year accreditation decisions are 4.818. The odds of meeting this standard over not meeting this standard for 5-year accreditation decisions are 53. The odds of appearing to partially meet this standard over not meeting this standard for 5-year decisions are 11. For 1-year accreditation decisions, the odds of appearing to meet this standard over partially meeting this standard are .416. The odds of appearing to meet this standard over not meeting this standard are 1; the odds of partially meeting this standard over not meeting this standard for the 1-year decisions are 2.404.

The odds ratio for meeting this standard over partially this standard between 1-year and 5-year decisions is .086. This indicates that the odds of meeting over partially meeting this standard for 1-year accreditation decisions is 91.4% less likely when compared to those for 5-year decisions. The odds ratio for meeting over not meeting this standard between 1-year and 5-year decisions is .019. This indicates that the odds of

meeting over not meeting this standard for 1-year decisions when compared to 5-year decisions are 98% less likely. The odds ratio for partially meeting over not meeting this standard between 1-year and 5-year decisions is .219. This indicates that the odds of partially meeting over not meeting this standard for 1-year decisions when compared to those for 5-year decisions are .219 times less likely.

Table 17

*Frequency of Sites by Accreditation Decision Length and Assessment Instruments and Procedures Standard Findings*

		Findings for Assessment Instruments and Procedures Standard			Total
		appears to meet	appears to partially meet	Appears not to meet	
<u>Accreditation Length</u>	1-year initial accreditation	23.5	56.5	23.5	103.5
	5-year initial accreditation	26.5	5.5	.5	32.5
Total		50	62	24	136

Note: 0.5 was added to all cells to accommodate for cells with 0.

### Summary of Log-Linear Models

Results from the log-linear models with three variables are described for each of the seven standards separately. Each of the seven models examined possible relationships between accreditation type, accreditation length, and findings on a particular standard. Results of the overall analysis showed that there was a significant two-way interaction



between accreditation length and findings on standards related to student learning outcomes. Regarding the relationship between accreditation length and findings on standards, the odds of receiving a particular length of accreditation when found to be in compliance, in partial compliance, or not in compliance with each of the seven standards related to student learning outcomes was examined. Results are described above in subsections aligning with the seven standards whose findings were examined. It is also found that in all seven log-linear models, the two-way interaction between accreditation type and accreditation length was shown to be significant. Regarding the relationship between accreditation type and accreditation length, the odds of receiving 5-year over 1-year was compared between institutional and programmatic awards.

Overall, schools that received 5-year accreditation met or partially met all seven of the standards examined in this study. None of the schools that received 5-year accreditation was found to not meet any of the standards. In addition, the findings for all of the standards examined had larger percentages of schools appearing to meet than appearing to *partially* meet the standards. The percentage of schools appearing to partially meet some standards and still receiving 5-year accreditation was low, and ranged from 3.2% (for the placement testing system standard and the assessment reporting standard) to 35.5% (for the written review plan standard).

## **Chapter 5: Discussion**

Relatively limited research has been performed on specialized accreditation, and little to none has surfaced on intensive English programs or IEP's. These schools, whether they are called institutes, centers, programs, or academies, provide English language training to non-native speakers of English and offer courses of at least 18 hours per week of study to their English language learner students. The mission of each school varies, as do the administrative structures, the student populations, curricular methodologies, and assessment practices. What the schools in this study had in common was that each one of them was seeking accreditation by CEA. While campus-based programs sought and earned programmatic accreditation awards, independent institutions received institutional accreditation. Both types of accreditation involve complying with the set of 44 CEA standards of best practice.

The purpose of this study was to identify and examine relationships between initial accreditation decisions for intensive English schools in the U.S.A. and findings of compliance with standards related to student learning outcomes and assessment. Additionally, this study was determined to discover whether the accreditation type was also related to accreditation decision or compliance with standards. In particular, the study examined decisions by the only specialized accrediting agency in the U.S.A. for intensive English schools: the Commission on English Language Program Accreditation (CEA).

The following research questions were used to determine whether there is an association between the lengths of initial accreditation awarded, accreditation type, and

findings of apparent compliance with standards related to student learning outcomes and assessment:

- (Research Question 1) What is the relationship, if any, between the accreditation type and an accreditation decision of one-year versus five-years?
- (Research Question 2) What is the relationship, if any, between review team findings (the ability to meet, partially meet, or not meet) on standards related to student learning outcomes and the accreditation decision of one-year versus five-years?
- (Research Question 3) What is the relationship, if any, between accreditation type and review team findings for the standards identified as relating to student learning outcomes?
- (Research Question 4) What is the relationship, if any, between review team findings of meeting, partially meeting, or not meeting individual standards identified as relating to student learning outcomes; accreditation type; and length of accreditation awarded by the Commission on English Language Program Accreditation?

### **Summary of Study Findings**

During the period of time examined in this study, programmatic accreditations of 5-years in length were awarded significantly more than institutional accreditations of 5-years in length (42.3% programmatic versus 18.7% institutional), while institutional accreditations of 1-year in length were awarded significantly more than programmatic accreditations of 1-year in length (81.3% of institutional versus 57.7% of programmatic).

An important discovery uncovered in this research is that the length of accreditation awarded to those schools seeking initial accreditation by CEA appears to be related to the accreditation type (RQ1). Programmatic accreditation awards were for longer periods of time than institutional accreditations. Programmatic accreditation is for programs that have direct reporting lines to universities or colleges. These programs received longer terms of accreditation than did those institutions awarded institutional accreditation during the period examined. In fact, it appears that programmatic accreditations are more likely to be for longer terms of accreditation than institutional awards when controlling for determinations of compliance with standards related to student learning outcomes and assessment. Specifically, the length of the initial accreditation awarded appears to be related to whether the type of accreditation is programmatic or institutional.

There are a variety of possible reasons for this result including that accreditation decisions are made based on three factors. The commission considers the findings in the review team report, the school's written response to the information and findings in that review team report, and the school's self-study report. This study examined findings from the review team report only. The other factors included in the commission's accreditation decision-making were not part of this study. Had they been a part of the study, they may have changed the results. In making decisions on length of accreditation, the commissioners may consider the findings from the review team report, and then disregard those findings upon reading the school's response to and rebuttal of those findings. In sum, the apparent association between accreditation type and accreditation length could

be due to the fact that accreditation decisions are not made in isolation; the decision-making process involves several documents and is made by committee.

Another possible reason for the apparent relationship between accreditation type and accreditation length is the external motivation from the U.S. government, in the form of the Accreditation Act, imposed on schools to apply for accreditation by December 2011 (later extended to December 2013). This federal mandate may have had the effect of prompting some institutional accreditation applicants to seek accreditation before they were completely prepared and prior to their being fully compliant with all of the standards. Units seeking programmatic accreditation were not subject to the same level of motivation because they are units within a larger institution which holds institutional or regional accreditation. Schools seeking institutional accreditation are examined as a whole, and they may not hold another accreditation to fulfill the requirements of the Accreditation Act.

Additionally, the review by CEA for institutional accreditation means that all of the programs within an institute are reviewed for compliance with the standards, as the institute as a whole receives accreditation. Other programs within the institute in addition to the intensive English language training program are examined. These may include teacher training courses, healthcare certificate courses, youth language training courses, and test preparation courses, to name a few. This is not the case for sites seeking programmatic accreditation wherein the only unit that is reviewed for compliance with the standards is the intensive English program. This situation may be a factor in the apparent relationship between accreditation type and accreditation decision.

Another important finding of this study is that sites receiving institutional accreditation were found to be in full compliance with (i.e., to appear to meet) fewer of the standards related to student learning outcomes than were the sites receiving programmatic accreditation. In other words, college and university campus-based intensive English programs appeared to meet more of the standards related to student learning outcomes than did independent institutions as reported in the review team reports. Meeting the standards is a consideration in the accreditation decision by the commission. Thus, while there is a relationship between accreditation type and length of accreditation awarded, there is also a significant association between findings on the standards related to student learning outcomes and length of accreditation awarded.

Schools that were found to meet standards were more likely to receive the longer, 5-year term of accreditation. The reverse is also true; schools that were found to partially meet or not meet a number of standards were more likely to receive the shorter, 1-year term of accreditation. This is to be expected, as it is described in the commission's policies that it can "grant one-year initial accreditation to a program or institution that substantially meets the CEA Standards but needs to address minor standards-related deficiencies" (CEA, 2014a, p.26). The results of this study that suggest that schools found to partially meet or not meet a number of standards related to student learning outcomes and assessment are more likely to receive the 1-year award of accreditation is in alignment with the policies and procedures of CEA. In fact, it underscores the idea that accreditation is equivalent to high standards and effectiveness, in other words, to quality, and is a form of quality assurance.

Results indicated that there is a relationship between length of accreditation awarded and apparent compliance with standards related to student learning outcomes and assessment (i.e., the findings). In other words, compliance with the seven student learning outcomes and assessment standards as measured by findings in the review team report is related to the length of accreditation awarded. It is seen in the study that all of the intensive English programs that received 5-year accreditation decisions met or partially met each and every one of the seven standards related to learning outcomes and assessment. None of the schools that received 5-year accreditation awards was found out of compliance with any of the seven standards related to learning outcomes and assessment. Additionally, for the group of schools that received 5-year accreditation decisions, all of the findings showed larger percentages of schools appearing to fully meet the standards than appearing to partially meet the standards. This is consistent with an accreditation agency basing accreditation decisions on standards compliance, and it highlights the promise by the accrediting organization that those schools that are found to be more compliant receive longer awards. That is to say, it supports the concept that accreditation is a badge of quality.

The results of the study can also be extrapolated to address the consistency with which review teams are making decisions. Indeed, they underscore the importance of training review team members for their onsite visit work and determinations of compliance. Teams are made up of peer volunteers, who are trained by the accreditation agency on making determinations based on standards and compliance with those standards. Longer accreditation awards are equated with apparent compliance with more standards. It is vital, then, that review team findings reflect consistency in determining

whether schools are meeting, partially meeting, or not meeting standards related to learning outcomes and assessment. The study results indicate that review team findings are consistent with accreditation decisions.

It should be noted that schools do not have to be in complete compliance with all the learning outcomes standards to receive accreditation. In fact, schools that were awarded 1-year accreditation decisions were not found to be in full compliance with standards; they were found to meet, partially meet, and even not to meet some standards related to student learning outcomes. Schools can appear to be out of compliance in some areas of learning outcomes and receive an initial accreditation award. Specifically, between 2% and 22.5% of programs and institutions that received 1-year accreditation were found to be out of compliance with some standards related to student learning outcomes.

More than 50% of the schools that received 1-year accreditation received findings of *appear to partially meet* on four of the seven standards related to student learning outcomes (Program Structure, Assessment Instruments and Procedures, Grade/Progress Reporting, and Written Review Plan). These standards concern assessment of learning outcomes, appropriateness of proficiency scales and grading criteria, collection and analysis of data on student performance (such as success and retention rates), and review of assessments and outcomes. From the findings, these standards were the most challenging for schools. The issues dealt with in this set of four standards are the core of student learning outcomes and assessment. They deal with not just the idea of stating outcomes for students, or placing them into levels by language proficiency, or even



informing them of how they will be tested. These standards address the essential elements involved in assessment practices.

There were two standards that schools tended to be in compliance with more than 50% of the time by the group of schools receiving 1-year accreditation. Student Achievement Standard 1- Placement Test (60.8% of schools met) and Student Achievement Standard 4 – Informing Students of Assessment Procedures (72.5% of schools met) were met more than partially met in the group of schools receiving 1-year accreditation decisions. These two standards address policies and processes of informing students. Most of the schools that received accreditation are informing students of level placement and assessment procedures and ensuring they are appropriately placed into class levels.

The study results suggest that accreditation type is not related to compliance on standards related to learning outcomes. Whether the school being evaluated for accreditation was eligible for programmatic or institutional accreditation, the findings from the review team report were not affected. This could be due to the on-target training of the review team members regarding determinations of findings, but further study should be done on this topic.

The final research question posed by this study asked whether there were any three-way relationships between accreditation type, accreditation length, and findings of compliance on standards related to student outcomes (RQ4). The log-linear models examining findings of compliance, award length, and award type showed no 3-variable interaction. These models suggest no association, but not complete independence between the variables. A possible explanation for this result involves the accreditation

decision-making. It is important to review the decision-making process employed by CEA for accreditation awards. The commission decides award length based on examination and review of three documents: the self-study report submitted by the school, the review team report submitted by the site visit team, and the school's response to the review team report. The variables in this study include information from one of those three documents: findings from the review team report. Commission decisions of award length, however, are based not solely on the findings from the review team report; they include consideration of the school's written response to those findings. The school's response to the findings can include factual corrections, actions that have been taken that affect the school's compliance with standards, and written plans to come into compliance with standards they were found not to fully meet during the review team visit. These written responses affect the award length: one of the variables in this study.

Additionally, it is important to consider that log-linear models do not suggest response or explanatory variables. These models do not identify a clear response, and they assume the discrete categorical variables to be nominal. For the variables in this study, however, one could consider award length as a response to findings. As described above, findings are a factor considered by the commission in deciding accreditation awards. The award length is decided based on level of compliance with standards; awards of 5-years signify higher levels of compliance. This two-way association was clearly suggested by the models. The three-way association was not suggested, and indicates that we cannot assume that award type and length are associated with findings.

## **Implications**

This study revealed that the length of initial accreditation awarded is significantly associated with accreditation type, and it is also significantly associated with the findings of compliance with standards related to student learning outcomes and assessment. This study provides information to the community of intensive English programs and to the specialized accrediting organization about accreditation decisions and their relation to compliance with standards. The findings are in alignment with previous research, which concludes that accreditation decisions are related to the ability to meet standards involving student learning assessments (Provezis, 2010). It highlights the importance of student learning outcomes and assessment of these outcomes as markers of quality and as being associated with accreditation.

Initial accreditation awards can be of one-year or five-years in length. One-year accreditation is granted with reporting requirements that must be met within the following year. These requirements are conditions with which the school must comply within the initial one-year of accreditation. If the reporting requirements are met within the one-year period, CEA grants the school a four-year continuation of accreditation for a total of five years. Five-year accreditation is considered full compliance with the CEA standards.

The results of this research are useful to intensive post-secondary English programs as they decide whether they are prepared to seek accreditation and how to best prepare themselves to meet the accreditation standards. Administrators, faculty, and staff at intensive English schools seeking accreditation should not underestimate the importance of having appropriate written learning outcomes, assessment instruments and

procedures, procedures to inform students of their progress, and systematic review and revision of elements related to outcomes and assessments. The stakeholders in the schools should recognize that these factors, and additional factors such as maintaining pass/fail rates and retention data and ensuring alignment of learning outcomes with assessment instruments and methods, are vital factors in the accreditation process and important to the accreditation outcome. Furthermore, the results of this research study are useful to the accreditation agency and accreditation specialists who are concerned with consistent decision-making based on standards and best practice. This research has added to the existing research in the field of specialized accreditation; further, it has begun foundational research in the area of intensive English program accreditation.

This study focused on a specific set of standards and did not encompass or examine all 44 of the CEA standards for accreditation. The set of standards examined in this study all concern student learning outcomes and assessments. The importance of student learning assessment and outcome-based education is recognized by higher education professionals (Kyriakos, 2009) and by accrediting organizations in turn (CHEA, 2011; ASPA, 2007). In fact, CHEA has proposed that “student learning outcomes are quickly becoming the primary gauge of effectiveness in higher education” (Kyriakos, 2009, p.36). Areas of student assessment and curriculum, related directly to student learning outcomes, are equated with measures of quality in educational programs, and are thus the focus of much of accreditation discussion. Add to this the fact that the student learning outcomes and assessment issues stretch across a variety of standard areas, and the importance of outcomes identification, assessment, measurement, and review is evident.

The standards examined in this study focus on a variety of aspects of student learning. They define quality education and programs through a triangulation of curriculum, evidence of student achievement, and program planning, development and review. These are key areas of program effectiveness and quality (Beno, 2004). Both assessment and accreditation are related in that they are markers of quality assurance (Lubinescu, Radcliff, & Gaffney, 2007).

While this study focused on findings for standards related to student learning outcomes, there are accreditation standards that pertain to other factors with which schools are expected to comply. Again, this study examined but seven of the 44 standards published by the CEA. Other standard areas include administrative and fiscal capacity, mission, student services, recruiting, and faculty, to name a few. Further research needs to be done on the relationship between accreditation decisions and findings on these other standard areas as these areas are also relevant to the school and to the student experience. It would be interesting for prospective students, the public, the accrediting agency, and the schools themselves to know whether findings on standards related to administrative and fiscal capacity or program planning and development, for example, are related to accreditation length and accreditation type.

### **Limitations**

One limitation of this study is that log linear analysis is appropriate and used when examining associations between variables rather than the effects of one variable on another (Tabachnik & Fidell, 2007). The analysis in this study, log-linear models, examined the associations or relationships between variables without examining causation and the effects of one variable on another or others. In short, the log linear

model makes no distinction between response and explanatory variables. It does not show causality, only association. The variables in this study are not causal; the findings on standards related to student learning outcomes are not predictive of accreditation decisions. Tabachnik & Fidell (2007) state that “multiway frequency analysis is remarkably free of limitations” (p. 861).

The sample size for this study was  $n = 133$ . The sample size of 1-year accreditation decisions was  $n = 102$  and the sample size for the 5-year accreditation decisions was  $n = 31$ . A future study with larger sample sizes could be beneficial in that it would increase the dataset.

A limitation of this study is that it dealt solely with the findings on seven standards involved in the accreditation of intensive English programs and set by the Commission on English Language Program Accreditation. That accrediting organization has a total of 44 standards that describe and set best practice in the field. Schools seeking accreditation are measured against all 44 standards. Further research on findings on other groups of standards would be beneficial.

A limitation of the study is the fact that it only examined findings from the review team report. This report is prepared by the team of peer reviewers who serve as the eyes and ears of the commission and write a report of apparent compliance with the standards at the culmination of a visit to the school seeking accreditation. However, this is not the only report considered in the accreditation decision-making process. Commissioners rely on the findings of the review team report, the school’s written response to that report, and the school’s self-study report when they make accreditation decisions. A future study that examines the complete decision-making process of the commissioners would be

beneficial to the field as it could give a more complete picture of importance of these factors in accreditation decisions.

A further limitation of this study is the fact that it dealt with accreditation decisions and data from one accrediting agency. The Commission on English Language Program Accreditation, or CEA, is the only specialized accreditor for intensive English programs. However, it is not the only accrediting agency that accredits intensive English schools. An institutional accrediting agency, the Accrediting Council for Continuing Education and Training, or ACCET, also issues institutional accreditations. The conclusions from this study cannot be extrapolated to schools that seek or have sought accreditation by ACCET as data from that agency were not included in this study.

A limitation of this study is that it examined accreditation award decisions; it did not include denials of accreditation. Furthermore, this study did not include data on reaccreditation decisions. Schools are accredited by CEA for an initial award of up to 5 years; following that initial accreditation period, schools can seek and receive up to a 10-year reaccreditation. Examination of the reaccreditation decisions and their relationship with standards compliance would also be beneficial to the field.

### **Future Research**

While there have been studies on accreditation decisions and decision-making, standards of best practice, and their relationship to student learning outcomes, there has been very little research on specialized accreditors, the decisions they make, and related issues. Specifically, there is little research on accreditation of English language schools in the United States. These schools, now mandated by U.S. law to be accredited in order to issue certificates of eligibility for non-immigrant student status to prospective

international students, should be the focus of future research. This future research should concentrate on the decision-making by the team of peer reviewers who visit the school, the findings of those peer reviewers on standard areas such as administrative issues, student services, and mission. This research should focus not only on quantitative aspects of decisions made, but on interviews with peer reviewers, administrators and staff at the institutes, and with commission staff who read the reports and may make recommendations to commissioners. Such research would give a clearer picture of relationships between decisions and compliance with standards and the importance of different factors in specialized accreditation decisions for intensive English programs.

Additionally, research is needed to examine the decision-making components and process within a review team and the work of the team in examining and verifying compliance with standards. Team members are peers and professionals in the field, with definitions of what qualifies as meeting, partially meeting, or not meeting a standard or standards; this topic is a much-needed target of future research. Research on reliability of review team decision-making is a worthy topic of future study. Study of components of and effectiveness of reviewer training and retraining on standards-compliance, defining compliance, and reliability would also be beneficial to the field of intensive English professionals.

As noted earlier in this chapter, the commission considers various documents in its accreditation decision. These documents include the school's self-study report, the review team report from the site visit, and the school's written response to that report. Future research would do well to examine the school's responses to the review team report and possible relationships with accreditation decisions.



This study examined initial accreditation decisions, and it not only excluded denials of accreditation, but it also excluded reaccreditation decisions. As noted earlier in this document, after the initial 5-year accreditation period ends, schools can apply for up to 10 years of reaccreditation. Further research should examine issues regarding reaccreditation and rates of successful reaccreditation, elements involved in the length of time of the award (i.e., 10 years) and the interim reporting that is required during the reaccreditation period.

### **Conclusion**

Accreditation has been perceived as an assurance to the public and to prospective students that an institution or program has met a minimum threshold for quality and standards of best practice (Rogers, 2000; Atwell, 1994; Brittingham, 2008; Nettles, Cole & Sharp, 1997). Specialized accreditation is one of the three types of accreditation in the United States, and its goal is to uphold standards of best practice in the best interest of the student, society, and the field itself (ASPA, 2014). Specialized accrediting organizations serve to assess the quality of specialized and professional higher education programs. These accreditors have standards that are “rigorous, comprehensive, and outcome-based” (ASPA, 2013, p. 2).

One specialized accrediting agency in the United States is recognized by the Council for Higher Education Accreditation (CHEA) to accredit intensive English programs, those programs that teach English as a second language. The Commission on English Language Program Accreditation (CEA) issues two types of accreditation: programmatic to units that have reporting lines directly to a university or other institution of higher education and are often located on campuses and institutional to independent

and often stand-alone institutes or schools that may offer other programs in addition to the IEP. Accreditation, whether by CEA or another accrediting organization in the U.S., is based upon compliance with a set of standards that reflect best practice. An integral part of the accreditation process in the U.S., and in which all schools seeking accreditation by a recognized accrediting agency must participate, is a site visit (Eaton, 2012). This entails a team of peer reviewers trained by the accrediting agency visiting the school seeking accreditation; the task of the peer reviewers who make up the site visit team is to verify the contents and claims made in the school's self-study report. The review team, upon completion of the visit to the school, writes a comprehensive review team report that includes determinations for each standard. In the case of the Commission on English Language Program Accreditation, these determinations, or findings, state whether the school that has been visited and examined by the team appears to meet, appears to partially meet, or appears not to meet each of the standards (CEA, 2015)

In 2010, the United States government passed the Accreditation of English Language Training Programs Act; it had widespread effects on the world of intensive English programs (IEP) across the United States (Fischer, 2012; NAFSA, 2012a). The Act mandated that in order to admit international students to a program of study, the intensive English program must be accredited (USICE, 2014). Enforcement of the Act began in 2012, and intensive English programs began applying for and seeking accreditation in order to be able to recruit and enroll international students.

The overall significance of accreditation and the accountability it represents has been affected by the increased emphasis on student learning outcomes assessment. Student learning outcomes examination and assessment is at the forefront of

conversations concerning quality (Eaton, 2009). With outcomes-based education growing in popularity, and demands by the public and government for accountability in higher education programs, accreditation agencies have been tasked with focusing on measures of outcomes in their accreditation decisions (ASPA, 1995).

Empirical evidence demonstrates that regional accreditors are demanding more in the area of student learning outcomes and institutions are not meeting those expectations (Provezis, 2010). Student learning outcomes assessments have been found to weigh heavily on accreditation decisions. This is supported by a report by the National Institute for Learning Outcomes Assessment that found between 60% and 80% of institutions were found to be not compliant with standards related to outcomes assessment (NILOA, 2012). Findings from this study show that accreditation decisions made by the specialized accrediting agency for intensive English programs are based on perceived compliance with standards.

Intensive English programs (IEP's) are often the first step for international students entering the U.S. As of March 2013, there were more than 99,000 international students studying at American intensive English schools. The importance of this population and the quality of the educational institutions providing language training cannot be underestimated. This segment of the higher education industry and the accreditation process for these schools is worthy of more study as issues of quality, standards, and student learning move more and more into the spotlight.

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