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Pepperdine University  
Graduate School of Education and Psychology

WHEN ACCREDITATION POLICY CHANGES: AN EXPLORATION OF HOW  
INSTITUTIONS OF HIGHER EDUCATION ADAPT

A dissertation submitted in partial satisfaction  
of the requirements for the degree of  
Doctor of Education in Organizational Leadership

by

Kim Levey

June, 2019

Andrew Harvey, Ed.D. – Dissertation Chairperson

This dissertation, written by

Kim Levey

under the guidance of a Faculty Committee and approved by its members, has been submitted to and accepted by the Graduate Faculty in partial fulfillment of the requirements for the degree of

DOCTOR OF EDUCATION

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## VITA

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Levey, K., Grogan, S., Robinson, J.B. (2018). *Building a unified co-curricular assessment strategy: An interdepartmental roadmap*. WASC Senior College and University Commission (WSCUC) Academic Resource Conference, Burlingame, CA.

Bray, C., Levey, K., Masters, J. (co-authors) Williams, H. E., Madjidi, F., Fraizer, L. (2017). *China's Educational Technology Opportunity: Exploring the Milieu for Scalability*. Fourth International Academic Conference of Exploring Leadership and Learning Theories in Asia (ELLTA): Perspectives on Leadership, Learning and Social Enterprise in Asia – Sharpening Focus on Research Collaborations and Publications, Pathumthani, Thailand.

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## DEDICATION

To my grandmothers, Ruth Levey and Raberta Wek – two amazing women who consistently demonstrate strength, resilience, and grace.

To my niece and nephew, Ellery and Carson – may you always delight in your learning.

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## ABSTRACT

Changing policies from the Department of Education and, subsequently, regional accreditors impact how institutions of higher education enact and implement processes and procedures (Beattie, Thornton, Laden, & Brackett, 2013). In today's environment, policy changes are occurring as policy-makers are reacting to pressure from taxpayers and critics alike as a result of decreasing international rankings and evidence of financial aid fraud at some institutions (Hartle, 2012). With efforts to reauthorize the Higher Education Act in addition to changes to federal law through negotiated rule-making, it is becoming increasingly more imperative that institutions of higher education become adaptable, as changes in the policies that govern how institutions operate continually shifts to account for the rise in technology, amplified public scrutiny, and growing student loan debt.

This qualitative, phenomenological research study investigated institutions of higher education to explore how they exercised strategies to operationalize changes needed as a result of changes in accreditation policy, what challenges in implementing changes in accreditation policy they encountered, how they evaluated the success of operationalized changes in practices and policies, and what recommendations they had for future implementation of accreditation policy changes. Eight Accreditation Liaison Officers in the WASC Senior College and University Commission (WSCUC) region, representing multiple institution types and sizes, were interviewed using a semi-structured protocol to determine the strategies, challenges, and evaluation methods used at their institution to operationalize three recently changed WSCUC policies. Furthermore, participants shared their recommendations for future implementation of accreditation policy. The 18 themes that emerged in the findings of this study contribute to higher education, organizational change, and policy impact scholarly fields.

## **Chapter 1: Introduction to the Study**

The current higher education landscape is one of uncertainty. With the long-awaited renewal of the Higher Education Act, added scrutiny of regional accreditors by the federal government, the White House Scorecard, and movement to gainful employment reporting, university leaders are preparing their organizations for an unknown future. Loan default rates, student loan debt amounts (which is at its all-time high), and job placement, are used as measuring sticks for success. Kezar (2014) states, “ While higher education may not be at the crossroads of a revolution, the enterprise will be required to shift in significant ways and is already undergoing many changes” (p. 3). America’s long term economic growth and social progress depend on the success of higher education (American Council on Education, 2013).

Federal government initiatives, whether changes in policy or the addition of targeted metrics, bring changes at the regional accreditation level. Accreditors are shifting their standards to align with the demands of the new education environment. The WASC Senior College and University Commission (WSCUC), one of six regional accreditors of higher education institutions in the United States, is one of the agencies tasked with ensuring the quality of institutions through the setting of standards and policies with which institutions must comply in order to maintain accreditation status. The purpose of regional accreditation, as WSCUC sees it, is to assure stakeholders that institutions have established an evidence-based culture and to validate their engagement in continuous improvement processes that show the institution’s integrity (Handbook of Accreditation Revised, 2013). Thus, as legislation at the federal level changes, it is the duty of the regional accreditor to align their policies and standards to not only meet the requirements set out by the Department of Education, but also to ensure that higher education institutions are aligned to new or changing policies as a sign of compliance.

“Academic quality – top-flight educational programs that provide value to the student – is essential. Without a central focus on quality, access is an empty promise” (American Council on Education, 2013, p. 7). Accreditors have thus been put in a position to attempt to ensure, through policies and standards, educational quality.

### **Accountability in Higher Education**

Accountability, equity, economic development, and public opinion are a number of reasons why a government may desire to influence the value of certain features of higher education (Beerkens, 2015). The triad – federal government, states, and private accrediting associations – was tasked with regulating the quality of postsecondary education in the early 1900s, a time at which student demographics were almost solely 18-24 year olds, the Carnegie Unit was a requirement with no exceptions, and universities relied on physical locations only to provide educational experiences for students (Murphy, 2016). Later on, the Veteran’s Readjustment Assistance Act of 1952 presented, for the first time, a stipulation that only allowed the use of student federal funding at accredited institutions, changing the role of accrediting agencies to act as gatekeepers to control which institutions were qualified to receive taxpayer dollars. Furthermore, with the Higher Education Act of 1965 expanded oversight of the Department of Education’s secretary to determine an accrediting agency’s ability to oversee quality of educational programs and systems (Brown, 2013). The National Advisory Committee on Institutional Quality and Integrity (NACIQI) reviews accreditors at least every five years to determine whether accrediting agencies shall be entrusted with receiving federal financial aid. As part of the review process site visits, standards, and public comments from institutions and programs are considered (Kelchen, 2017).



Now, accreditation activity is administered by 10 pages of law, 27 pages of regulation and 88 pages of sub-regulation (Council for Higher Education, 2017). Accreditors are tasked with implementing these rules and also re-aligning standards to align with that of the Department of Education when new law is enacted and regulations are changed. The Higher Education Act, most recently reauthorized in 2008, is to be reauthorized every five years (*Senate Democratic Caucus Higher Education Act Reauthorization Principles*, 1965). Although multiple postponements have kept changes as dictated through legislation at bay, a reauthorization of the bill is forthcoming, and with it accreditors and institutions alike will see deviations from current guidelines. The Promoting Real Opportunity, Success and Prosperity Through Education Reform (PROSPER) Act is the most recent attempt at reauthorizing the Act, and was passed by the House of Representatives subcommittee on Higher Education and Workforce Development. In addition to many changes in an attempt to streamline financial aid and address fiscal challenges that the Act brings, the PROSPER Act removes the ten standards that dictate recognition of accrediting agencies and associations and replaces it with one standard (*Summary of H.R. 4508, The Promoting Real Opportunity, Success and Prosperity Through Education Reform (PROSPER) Act*, 2017). It also changes the rules by which accreditors carry out activities and assess institutions (Promoting Real Opportunity, Success, and Prosperity through Education Reform Act, 2017). No matter the outcome of the bill, it is a prime example of the major modifications that can be made to legislation that directly impact how accrediting agencies conduct business and, as a result, how institutions must also meet requirements in order to remain a viable entity and to serve the students that come to their institution.

In addition to the Handbook of Accreditation, which describes the accreditation and reauthorization process, WSCUC has 47 policies in place by which to evaluate the institutions

they accredit (*WSCUC Policies List*, 2018). These policies are re-aligned to meet standards enacted in the Higher Education Act each time it is reauthorized. Furthermore, the Department of Education may exercise its authority to initiate or update regulations outside of the Higher Education Act that impose rules within the higher education space. These may also impact the breadth, depth, and other reporting requirements of accreditors, and can occur beyond the confines of legislation that is reconsidered on a pre-determined cycle. In early 2018, the Department of Education announced that it planned on using negotiated rule making processes to amend rules regarding accrediting agencies and procedures (McKenzie, 2018). Multiple vehicles for imposing changes upon institutions through regulation and accreditation policy exist and leaders of institutions must always be at the ready to ensure alignment of internal policies and practices to maintain good standing.

### **Theoretical Framework**

Change is an inevitable event; however, it is not one that has always been at the doorstep of the higher education industry. “Higher education around the world is undergoing tremendous change – so much so that it has almost become a cliché to say that it is facing disruptive innovation” (Brown, 2013, p. 6). As a result of this shifting political and compliance environment, higher education leaders are being challenged to pivot with the times. University administrators, faculty, and staff must work together to re-align internal practices to meet shifting accreditation policy, while also satisfying their basic business purpose of providing a quality academic experience to the students they serve. These shifts require institutions to undergo internal changes to meet requirements. As such, universities find it imperative to develop and carry out a strategic plan, establish goals and aligned performance metrics, and

utilize evaluative measures for outcomes in an attempt to show efforts toward quantifying quality (Ramsden, 1992).

However, organizational change in higher education institutions offers unique challenges, especially when changes are coming from a compliance body rather than through an organic method driven by faculty. It is a complex political setting under which quality assurance mechanisms evolve and a variety of factors intersect, not only limited to higher education expectations but also the governmental structure deployed to ensure quality, stakeholder roles in accountability, and larger trends in public policy (Beerkens, 2015). As part of enacting change in any environment, including the implementation of new or altered organizational practices, organizational culture and existing organizational structures must be considered. Simpicio (2012) posits that university cultures, while steeped in tradition, can and should be fluid as an organization matures. Brunetto and Farr-Wharton (2005) found that role of academic management greatly influenced how academic staff responded to new policies. Leaders in higher education must identify the organizational culture that is in place in order to lead the institution to the changes needed to support the mission as well as meet the expectations established by the accrediting bodies.

Within organizations there exists webs of relationships, and it is critical to remember this (Wheatley, 2005) especially when considering an organizational change strategy. As policies continue to evolve with the disruptions to the higher education industry, leaders in a future workplace setting need to develop skills that allow them to quickly adapt to change while also maintaining the institutions values, mission, and long-term goals as the foundation (Sowcik, Andenoro, McNutt, & Murphy, 2015). A genuinely elegant organizational shape is one where

relationships between the local and the whole allow for shared links to the spirit of the appreciable world (Cameron, Dutton, & Quinn, 2003).

### **Statement of the Problem**

Changing policies from the Department of Education and, subsequently, regional accreditors impact how institutions of higher education enact and implement processes and procedures (Beattie, Thornton, Laden, & Brackett, 2013). In today's environment, policy changes are occurring as policy-makers are reacting to pressure from taxpayers and critics alike as a result of decreasing international rankings and evidence of financial aid fraud at some institutions (Hartle, 2012). Because of these pressures it is evermore imperative that leaders assess their own institution's landscape, including the structure's ability to handle dynamic change (Bejou & Bejou, 2016), to operationalize requirements as dictated by authorities. Thus, institutions are challenged to determine the best means in translating changing policies into institutional processes and procedures.

### **Purpose Statement**

Therefore, the purpose of the study is to investigate institutions of higher education and how they exercise strategies to operationalize changes needed as a result of changes in accreditation policy, what challenges in implementing changes in accreditation policy the encounter, how they evaluate the success of operationalized changes in practices and policies, and what recommendations they have for future implementation of accreditation policy changes. It seeks to understand what future processes and strategies in higher education institutions are implemented when changes in regional accreditation policies are encountered by focusing on the lived experience of designated Accreditation Liaison Officers at accredited colleges and universities in the WASC Senior College and University Commission region.

## Research Questions

The following research questions (RQ) were addressed in this study:

***RQ1*** - What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?

***RQ2*** - What challenges do higher education institutions encounter in implementing changes in accreditation policy?

***RQ3*** - How do higher education institutions evaluate the success of operationalized changes in practices and policies?

***RQ4*** - What recommendations would higher education institutions make for future implementation of accreditation policy changes?

## Significance of the Study

The significance of this study becomes increasingly essential with each year. Shifts toward accountability and changing indicators of accountability in higher education make it an industry anticipating changes in policy and standards. Performance metrics are moving targets. As institutions face increasingly more stringent standards it is ever more important that they have the tools to enact changes in policy within their own colleges and universities to remain in good standing and, thus, have the ability to maintain itself as a business in full compliance. Findings from this study bring insights for both university leaders and policymakers alike.

**University leaders.** Costs directly related to an accreditation review have been calculated to be at least \$1 million (American Council of Trustees and Alumni, 2013). The weight of accreditation is beyond that of pressure from students and parents, but is also a costly endeavor impacting budgeting and staffing decisions. Moreover, it takes a lot of precious time to anticipate, receive, and internalize changes as policies are updated. Expectations are that

institutions create their own dynamic system for internal monitoring for quality (Askling, 1997). Institutions can learn how best to pivot in order to sustain compliance.

Leaders of institutions must be prepared to make organizational change to ensure alignment with set standards. However, Salto (2018) found that some university administrators have erred to over-compliance, going beyond requirements, in an effort to meet new or changing regulations. In the regulatory environment, urgency of multiple objectives changes over time based on changes in policy and expectations of various stakeholders. This creates tension between layers of goals and anticipations which are often subtle tensions only gaining attention through unexpected and open disagreement (Beerens, 2015). With many competing priorities, leaders must be able to focus on mission and values, without being distracted with rhetoric and nonsense. When institutions only implement systems for quality management in a symbolic manner rather than in an authentic and effective way, resistance to changes are only masked (Csizmadia, Enders, & Westerheijden, 2008) and the changes enacted will eventually be overtaken by the culture.

The higher education industry has a great potential to guide transformations (Pine II & Gilmore, 2011) and leaders of institutions need to be prepared to be innovative organizations while abiding by guidelines set forth by their accrediting body. Yet, these change processes due to shifting policy allows institutions the opportunity to learn about themselves, using findings to become a more effective and equitable institution. In addition, organizational change-based implementation processes have pinpointed an even greater need to gather a more clear understanding of how employees respond to such initiatives (Brunetto & Farr-Wharton, 2005). Thus, as regulation changes and internal processes and practices are modified to align, organizations can continually learn about it strengths and areas for continuous improvement.

**Policymakers.** Not only is the study of organizational change within the context of changes in accreditation policy impactful for institutions, it also offers a learning opportunity for the accrediting agencies and other policymakers as well. With the onset of the digital age within the higher education landscape in addition to a global context for delivery of educational products, the triad regulators in addition to other stakeholders are engrossed by layers of statutes while navigating the political environment to try to devise a solution for (Murphy, 2016). Yet, there is minimal understanding of policymakers of the impact that such changes bring on an institution. Oftentimes, changes to accreditation policy are quick and rolled out with minimal information or follow up within a fair timeframe, leaving institutions in a unique position. Thus, an examination and reflection on the higher education systems built by policymakers to ensure quality assurance must be done to identify areas that have been beneficial to students and elements that have resulted in negative consequences (Kelly & James, 2014).

Ultimately, education policy spills from the United States Department of Education, to the accrediting bodies, then the institutions that are providing the learning content and environment, and, lastly, to the students who experience the outcome of implemented policies and practices. At the center of any decision-making for both policymakers and institutions of higher education in what standards to enact and how to execute them, should be an authentic concern for the students who trust the educational system to accelerate them toward their own personal ambitions. Implications of this study are for public and private quality assurance agencies alike, as well as the institutions that they review and accredit.

### **Assumptions of the Study**

The researcher assumes that:

- Participants respond to interview questions honestly and to the best of their ability

- Participants, while holding the designation of Accreditation Liaison Officer for their institution, have sufficient knowledge of regional accreditation requirements
- Responses given by participants will adequately address the research questions
- Qualitative data collected and analyzed for this student will improve organizational change strategies and practices in higher education institutions

### **Limitations of the Study**

This phenomenological study will utilize semi-structured interviews of designated Accreditation Liaison Officers at colleges and universities in the WASC Senior College and University Commission region. While the people who hold this designation are responsible for understanding and implementing accreditation policy at their respective institution (*Accreditation Liaison Officer Policy*, 2018) this study is limited to their perspective and interpretation of the policy and implications for their institution and their past experiences operationalizing policy. These Accreditation Liaison Officers will be asked to articulate their thoughts and insights about the operationalization process at their institution and relies on their responses to be given in an open and honest manner. In addition, this study is limited to one region of the United States. Lastly, it is important to recognize the potential for researcher bias in any qualitative study, although the researcher will consider this in the design and execution of the study to minimize its impact.

### **Definition of Terms**

The purpose of this section is to provide explanations of terms referenced throughout the study that may be nuanced and hold significance to the topic. These terms are:

- Absolute Graduation Rate. The proportion of entering students who eventually graduate, regardless of how long it takes them; this number, combined with the institution's



Average Time To Degree, provides all the information needed for prospective students to estimate their chances of receiving a degree and the time it will likely take to do so (*The Graduation Rate Dashboard*, n.d.).

- Accreditation. Accreditation is designed to serve three purposes: (1) to assure the quality of institutions and programs, (2) to encourage the improvement of institutions or programs that have already met basic standards, through continued focus on goals and achievements, and (3) to certify institutional or program sufficiency as required for the receipt of public funds and for institutional licensure by states, and as a partial basis for decisions about the transfer of academic credit from one institution or program to another (*CHEA Almanac of External Quality Review*, 2015).
- Accreditation Liaison Officer (ALO). WSCUC mandates that each accredited institution has a designated Accreditation Liaison Officer (ALO). The ALO is appointed by the Chief Executive Officer of the institution and is responsible for actions including preparing accreditation reports, interpreting WSCUC standards, policies, and procedures for the institution, maintain accreditation files, and ensuring proper communication about WSCUC requirements is disseminated across campus (*Accreditation Liaison Officer Policy*, 2018).
- CHEA. Council for Higher Education Accreditation, is the largest institutional higher education membership organization in the United States, with approximately 3,000 degree-granting colleges and university and 60 recognized institutional and programmatic accrediting organizations (“CHEA at a glance,” 2018).
- Department of Education. The United States Department of Education establishes policies related to federal education funding, administers distribution of funds and

monitors their use; collects data and oversees research on America's schools; identifies major issues in education and focuses national attention to them; and enforces federal laws prohibiting discrimination in programs that receive federal funds (Department of Education Organization Act, 1979).

- Federal Financial Aid. Financial aid from the federal government to help students pay for education expenses at an eligible college or career school. Grants, loans and work-study are types of federal student aid (*The Guide to Federal Student Aid 2018-19*, 2018).
- Institutional accreditation. An accreditation type which normally applies to an entire institution, including freestanding single-purpose institutions which is typically used to establish eligibility to participate in Title IV programs (*The Database of accredited postsecondary institutions and programs*, 2017).
- Meaning, Quality, and Integrity of the Degree (MQID). Institutions are expected to define the meaning of the undergraduate and graduate degrees they confer and to ensure their quality and integrity. WSCUC understands quality and integrity to mean a rich, coherent, and challenging educational experience, together with assurance that students consistently meet the standards of performance that the institution has set for that educational experience (Handbook of Accreditation Revised, 2013).
- NACIQI. National Advisory Committee on Institutional Quality and Integrity, established in the 2008 Higher Education Opportunity Act to provide recommendation regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes (Higher Education Opportunity Act, 2008).

- Organizational Change. A process in which a large company or organization changes its working methods or aims, for example in order to develop and deal with new situations or markets (*Cambridge dictionary*, 2018).
- Organizational Culture. A system of shared meaning held by members that distinguishes the organization from other organizations (Robbins & Judge, 2015).
- Regional accreditation. Accreditors operate in six specific clusters of states (regions) in the United States, and review entire institutions, 100 % of which are degree-granting (*Fact Sheet: Profile of accreditation*, 2012).
- Rigor. “in education, refers both to a challenging curriculum and to the consistency or stringency with which high standards for student learning and performance are upheld” (Handbook of Accreditation Revised, 2013, p. 50).
- Self-Study. The self-study process that is used in accreditation requires institutions to examine, reflect, and cast judgment on the quality, integrity, and effectiveness of their academic and administrative activities and usually results in a comprehensive document (Rincones-Gómez, Hoffman, & Rodríguez-Campos, 2016).
- Shared Governance. The core notion of shared governance is that faculty and administrators both have important roles to play in setting university policy (Leach, 2008).
- Specialized accreditation. The evaluation of programs, departments, or schools which usually are parts of a total collegiate or other postsecondary institution. The unit accredited may be as large as a college or school within a university or as small as a curriculum within a discipline (*The Database of accredited postsecondary institutions and programs*, 2017).

- **Substantive Change Policy.** Substantive changes in candidate or accredited institutions are to be reported to the Commission and approved in advance of implementation. A substantive change is one that may significantly affect the institution's quality, objectives, scope, or control, or that triggers conditions established under federal law (*Substantive Change Policy*, 2017).
- **Triad regulators.** The three entities charged with the oversight of the American higher education accountability system – the United States Department of Education, individual states, and private accrediting agencies.
- **Unit Redemption Rate.** This metric is a completion measure that can be applied to institutions serving any population of students and does not directly measure the proportion of students who graduate in a given length of time, but rather the proportion of instructional units granted that are ultimately counted toward the successful conferral of a degree (*The Graduation Rate Dashboard*, n.d.).
- **WSCUC.** WASC Senior College and University Commission, one of seven regional accrediting bodies in the United States.

## **Chapter 1 Summary**

Changes to federal laws and accreditation policies that regulate the higher education industry are inevitable. A 2018 report published by the U.S. Department of Education Office of Inspector General (*U.S. Department of Education's Recognition and Oversight of Accrediting Agencies*, 2018) cited inadequacies in the oversight of accrediting agencies by the Department of Education and made recommendations for alterations for how agencies are evaluated. A report on accreditation policy recommendations regarding regulatory reform developed by NACIQI (Keiser, 2018) recommended changes to legislation and regulation that would use an efficient yet

risk-informed approach to how accrediting agencies and the Department of Education evaluate institutions, releasing some resources and time in order to direct focus toward those that are of greatest concern. Furthermore, as technology continues to disrupt the industry, demographics of the college student are evolving, and concerns around the rising cost of tuition and subsequently financial aid debt increase, the ecosystem that governs how institutions provide education and support services will shift to meet the demands of the 21<sup>st</sup> century. Institutions need to be prepared to operationalize changes that may occur.

Although the new competitive and technological setting endangers the status quo in the higher education industry, it also provides the opportunity for universities to make themselves more appreciated by the public and students as well as liberated (Christensen & Eyring, 2011). Institutions can choose to use changes to refine process and policies to increase internal collaboration and communication, and improve the student experience. The definitive goal of quality assurance processes set forth through the accountability structure is for institutions to grow themselves into *learning organizations* (Dill, 1999) so that internal mechanisms result in an evidence-based culture where best practices in teaching and learning are disseminated often and academic decision-making and quality metrics utilizes peer accountability systems (Dill & Beerkens, 2013).

## **Chapter 2: Literature Review**

This literature review is divided into three major sections in order to provide the most relevant information as related to the research topic. Thus, the review begins with the historical context of accountability in higher education, including an overview of the current regional accreditation structure and, more specifically, and in depth review of the specific regional accreditor applicable to this study. This is followed by a presentation of organizational change in higher education literature, and then an exploration of three organizational change models to provide a framework through which to view change initiatives within the industry. The literature review then addresses empirical studies where accreditation policy or requirements has been utilized to make changes in higher education institutions.

### **Accreditation and Accountability in Higher Education**

Education is seen as a channel to become self-actualized members of society, maturing their own potential, collaboratively problem-solving all while exploring individual purpose (Cooper, Parkes, & Blewitt, 2014). Tagg (2008) argues that colleges are tasked with taking under-prepared students and ensuring that by the time they graduate, they have the knowledge and skills for careers that demand cognitive and communication skills on top of the mere degree which makes the degree itself meaningful. Both are large tasks that require unique structures, including academic and other services that support students on their path towards completing a degree.

However, Hilton and Jacobson (2012) argue that colleges are universities are no longer scarce institutions serving a rare subgroup of society – large and diverse socio-economic populations are being served by higher education institutions, growing the subgroup immensely. Because of this, there is even more pressure for institutions of higher education to responsibly

deploy programs that are market-relevant and result in meaningful learning while also providing engaging services for the students along the way. Continued scrutiny stems from this expectation where even the scope of education as a whole is in question. Federal and state policymakers believe that colleges and universities ignore major issues such as access and the alignment of K-12 and higher education, workforce training, community engagement, and economic development (Kezar, 2009). No matter how institutions are viewed over time, there remains a constant call for accountability, and accrediting agencies are one of the major bodies who are charged with this task.

Four primary populations have a stake in accreditation: state and federal governments, the higher education community in general, students, and the public at large (Eaton, 2001). Achieving an accreditation signifies that an institution meets the agency's standards and, within the framework of its mission, is reaching the goals it has set forth. Thus, this publicly acknowledged assurance may even influence enrollment and funding decisions (Dodd, 2004). This external force is beyond the control of an institution, but accreditation has a high effect on internal operations. Still, different external pressures are in conflict with one another, forcing institutions to move in multiple directions (Morest, 2009). This creates additional challenges for institutional leaders, in addition to oversight of regular day-to-day operations. Because stakeholders are so intertwined, market forces, including political ones, are pressuring leaders at institutions to review operations from multiple directions (Burke, 2005). Such externally guided imperatives for change are affecting the university system in a way where it is being shocked by environmental transformation (Considine, 2006).

In addition to accrediting bodies, higher education also has a number of stakeholders who must be considered continually. They include faculty leaders and presidents, senior

administrators, trustees and system-level offices, students, alumni, members of the local community, higher education associations, the U.S. Department of Education, related Congressional committees, governors, state departments or boards of education, state legislatures, and funding organizations (Fish, 2015). Each of these groups has a unique impact to the system, bringing differing experiences and perspectives to the ecosystem of the industry.

Accreditation processes take time, resources, and a well-guided internal process that is communicated thoughtfully and clearly. Chaden (2013) declares that moving the institutional culture to accommodate the effort and time necessitated for these activities is itself a challenge. Moreover, it is difficult to interpret and reframe external requirements, including data and research needs, creating a challenge for administrators to organize operations in a way that is beneficial to all groups within the institution (Morest, 2009). Nonetheless, with the ever-shifting perceptions on accountability structures within the higher education space, questions are arising as to the utility of the bodies that are tasked with compliance and regulation. The increased focus on access for all, expanding reach into the space by public policy, calls for more accountability, the disruption by advances in technology, and the large sums of private and public money being poured into higher education have created ongoing changes in the regulatory structure (Eaton, 2012).

**Historical overview of the accountability structure.** While quality is a value that is greatly held by higher education institutions, measures of quality are difficult to define clearly and enact consistently. As such, it is difficult to establish specific and common criteria to measure quality across all institutions (Baker, 2002). Because of this, the responsibility of monitoring quality of higher education programs and services has been called into question over time. As the number of institutions grew over many years, American colleges and universities



moved from little regulation to the structure in existence today. The first set of regional accreditors - the New England Association of Schools and Colleges, Middle States, Association of Colleges and Schools, North Central Association of Schools and Colleges, and the Southern Association of Colleges and Schools – were established in 1885. The Western Association of Schools and Colleges (the previous name of the current organization, WSCUC) later followed in 1924 (Brittingham, 2009). The emergence of accreditors sparked the debate on who is responsible for ensuring the quality of education at higher education institutions and with what measures these institutions would be assessed.

The United States Constitution does not leave the responsibility of higher education to the federal government. In fact, it states that all measures that are not contained in the document are to be left to the states and to the people (Brittingham, 2009). As such, the government, including the Supreme Court and Congress, were left to determine how to situate the oversight of such endeavors. Ultimately, the United States Department of Education was established, and the responsibility of engaging colleges and universities in a system of accountability was given to an established set of regional accreditors. Congress determined that by utilizing accreditors to ensure accountability, institutions of higher education would not be subjected to unnecessary and potentially damaging external controls (Neal, 2008). By the 1890s, there were over nine hundred institutions of higher education in America, and because of the increased growth within such a short timeframe, a speedy organization by the accreditors to establish standards and criteria commenced. This created the beginnings of the accountability environment from which current requirements and informed ecology was formed (Brittingham, 2009). However, what once began as a voluntary endeavor, accreditation is now a mandatory activity (Neal, 2008). The foundation of accreditation requirements are intertwined with that of federal requirements dictated by the

Department of Education. The challenge for accreditors, regional and national, is to responsibly align policies and standards with that of the federal government. Therefore, when federal education laws change that impact higher education, accreditors must make the appropriate shifts to ensure complete and total alignment.

***The Higher Education Act.*** The Higher Education Act (HEA) was enacted in 1965 as part of President Lyndon B. Johnson’s national agenda. The Act has been reauthorized eight times since the inaugural signing, most recently in 2008. The reauthorizations were completed in order for the law to support the progression of higher education as it evolved over time. Such evolutions include applications and provisions for federal financial aid, provide resources for classroom teachers, and recognizing the shift of on-ground learning into the distance education (or online) space. Within the HEA, there are ten Titles, under which the laws are established. For instance, Title II covers teacher quality enhancement, Title III addresses areas of institutional aid, and Title IX includes issues related to equity, reporting, and audits (Higher Education Opportunity Act, 2008).

***Title IV.*** In the 2016-17 school year, the federal government provided approximately \$123 billion in financial aid to help nearly 13 million students pay for college (U.S. Department of Education, “Annual Report FY 2017,” Federal Student Aid, 2017). The provisions outlined in Title IV of the HEA allow students to qualify for federal loans in order to pursue a degree at a higher education institution. The movement toward expanding federal financial aid funding exploded in the 1960s when calls for equal access to education across ethnicity and gender resulted in an increase of availability of funds. In order to monitor which institutions qualify to receive such funding, the United States Congress built a three-pronged system to determine eligibility. The three entities that were, and still are, tasked with this responsibility are the United

States Department of Education, state governments, and regional and national accreditors – each with a separate purpose. The DOE was entrusted with ensuring the financial stability of institutions, the state government was responsible for guaranteeing that institutions were approved to operate within state boundaries, and accreditors were left to certify the quality of educational programs (Hartle, 2012).

The ability for universities to accept federal student aid through Title IV provisions is tied to the credit hour which dictates that universities align the assignment of academic units to the amount of time courses conduct classroom time as well as the amount of time expected of students outside of the classroom – completing assignments, reading required texts and research, and studying for exams. The history of the credit hour is a point of contention in the current higher education environment. Originally, the credit hour was established as a way to calculate the pension allocations for professors (Schulte, 2016). It is unrelated to learning or research on pedagogy yet institutions must maintain their own credit hour policy that aligns with the DOE, and also have processes for ensuring that the credit hour is applied appropriately across courses at the institution. Regulations rolled out in July 2011, charged accreditors with verifying the adherence to the credit hour (Hartle, 2012). It was no longer the sole responsibility of the federal government.

With the rise of proposed learning opportunities such as competency-based education, the credit hour is being called into question. Competency-based education is a system of granting credit based on students' demonstrating the achievement of competencies rather than a granting of credit based on seat time in a classroom. Under the current HEA universities must utilize the credit hour for all programs issuing academic credit. However, in 2013 a pilot was introduced by the DOE for a number of accredited universities to offer competency-based education that could

be funded with Title IV funding. Attempts to reauthorize the HEA in recent months have called for the removal of the credit hour, in favor of competency-based approaches to teaching and learning in higher education.

*90/10 Rule and gainful employment.* The 1992 reauthorization of the HEA called for certain reporting requirements with the intent to increase the regulation and accountability on for-profit institutions. The 90/10 Rule was established to limit the amount of federal financial aid funding that proprietary universities receive. In an attempt to reduce predatory recruiting practices the 90/10 Rule states that for-profit institutions can have no more than 90 percent of their revenue come from federal financial student aid (Higher Education Opportunity Act, 2008). Originally, the rule was set at 85 percent, however in recent years it was extended to 90. Supporters of this rule are trying to expand it to include restrictions on for-profits to include caps on receipt of GI Bill funding from active military and veterans because of reports of questionable recruitment practices with military students (Lewin, 2012). Opponents of this rule would like to see it lowered or abolished in an effort to support more access to education for adult learners and students from underserved population (Guida Jr. & Figuli, 2011).

Gainful employment reporting occurs for universities that offer academic certificate programs that are eligible for Title IV federal funding for non-profit and public universities. Proprietary intuitions must report these data for all programs within their institution. In such cases, programs are required to publically disclose the employment rates, amongst other data points, of students after the completion of the program (*Office of Postsecondary Education Gainful Employment Disclosure Template Quick Start Guide*, 2018). This is to ensure that these qualified certificate programs are proving to be beneficial to the student and applicable to the marketplace (Xu, 2014). This rule impacts the environment in which institutions are allowed to

offer programs and accept money from the federal government to finance the education of students. In addition to the credit hour policy, the 90/10 rule is a section of the HEA that is under review and consideration by congress and, if changes are enacted, both accreditors and institutions alike will be required to consider such changes in their own policies and procedures.

**Current accountability structure.** The current accountability structure for institutions of higher education is left to the six regional accreditation bodies, with ultimate oversight by the United States Department of Education. In the current system, leaders of educational institutions can expect ongoing scrutiny by regional accreditation bodies (Bardo, 2008), often in the forms of annual reporting, mid-cycle reports and reviews, site visits, and special site visits for some expansion efforts. Carey (2007) argues that accountability is, at its core, a show of responsibility to the government, the students, and society as a whole. Accountability can be limiting, but also can create collaborative relationships. Without the responsibility that accountability brings, commitments to the stakeholders can be lacking (Carey, 2007). As Brittingham (2009) notes, the American system of higher education accountability is unique, and is comprised of three dimensions:

1. *Accreditation is a nongovernmental, self-regulatory, peer review system*
2. *Nearly all of the work is done by volunteers*
3. *Accreditation relies on the candor of institutions to assess themselves against a set of standards, viewed in the light of their mission, and identify their strengths and concerns, using the process itself for improvement.* (p. 10)

The core values of the academy are entwined in accreditation – significance of the mission, peer review, academic freedom, and institutional self-governance. It is really a process of self-regulation (Eaton, 2012). However, as Neal (2008) claims, the reach that accreditors have now

more than ever is an ability to interfere with the very foundation they were created to protect – institutional autonomy.

In 1996, the federal government enacted increased responsibilities for accreditors as there was amplified and widespread evidence of federal student loan program fraud and abuse (Hartle, 2012). More recently, with the 2006 report, *A Test of Leadership: Charting the Future of U.S. Higher Education*, otherwise known as the Spellings Report, the call for greater accountability pushed accreditors to reevaluate policies and begin to make changes (Spellings, 2006). However, the Spellings Report created a level of backlash amongst some. Padro (2007) argued the report showed that institutions of higher education were now a part of a knowledge industry, rather than a place for learning. As such, stakeholders in the higher education space continued to question the roles of institutions, the federal government, and accreditors in the education experience itself and the responsibilities of each. Thus, regional accreditors find themselves in a unique situation in that they are criticized by the public and those in congress for not providing high enough levels of accountability, yet also by the institutions they accredit for being too intrusive and costly (Hartle, 2012). Contributing to this environment are two trends that are impacting the federal government's view of accreditation – the expansion of technology and the growing nationalization of public policy (Eaton, 2012).

Brittingham (2009) argues that the current regional accreditation structure has a number of benefits that are not always discussed: (1) it is cost-effective, (2) it is positive professional development, (3) when self-regulation works, it is better than government regulation, and (4) brings together a diverse set of institutions that provide conditions through which students can efficiently transfer between schools while taking college credit with them. Nonetheless,

accreditation has a long-standing history and public awareness such that it is generally accepted as a foundational piece of the educational landscape (Bloland, 1999).

***Federal compliance and advisory bodies.*** Although institutional quality, compliance with the credit hour policy for Title IV funding, and financial stability measures are left to regional accreditors to enforce, the United States Department of Education has the final authority on approving the accreditors. According to the Secretary of Education Federal Register (“The Secretary’s Recognition of Accrediting Agencies,” 1999), “each accrediting agency must submit an application for continued recognition at least once every five years, or within a shorter time period specified in the final recognition decision.” Accrediting bodies prepare a report for DOE staff to review. A call for public comment is posted in the federal register, and initial approval or reaffirmation of adequacy is determined. Accreditors are one of three compliance bodies in existence, put in place to ensure the quality of institutions. These three bodies are referred to as the triad and consist of accrediting agencies, the Department of Education, and individual states (Hartle, 2012).

In 1992, congress formed the National Advisory Committee on Institutional Quality and Integrity (NACIQI) to appraise accrediting bodies and make suggestions and commendations to the secretary of education. Recommendations are shaped to advise on the ability of the accrediting organization to be determined a trustworthy power (Hartle, 2012). As part of their duties and responsibilities, NACIQI participates in the review of agencies that are up for reaffirmation or initial approval. This committee submits recommendations to the Secretary of Education to provide insight on the decision. Membership on the NACIQI is comprised of seasoned leaders in the higher education sector who are appointed by the Secretary of Education, the House of Representatives, and the Senate – each appointing six members to the committee.

Established in 1996 as part of the movement toward increased accountability, the Council on Higher Accreditation Education (CHEA) aims to be a national organization that recognizes accrediting agencies in order to affirm quality, improvement, and accountability. The Committee for Recognition within CHEA is made up of representatives from higher education institutions, accrediting bodies, and public members. Accrediting agencies undergo a review by CHEA every ten years with interim reports submitted usually at years three and six (*Recognition of Accrediting Organizations - Policy and Procedures*, 2010). CHEA is the only nongovernmental agency that reviews accrediting agencies. It also serves as a voice of advocacy for issues and concerns being raised in the higher education community. While CHEA is a respected organization with adequate input on matters that affect higher education, its approvals do not have bearing on the existence of an accrediting agency, however through influence and reputation, it can help or hurt an accrediting body's chance at survival. Ultimately, it is NACIQI's decision to approve or deny accrediting bodies in the United States (Higher Education Opportunity Act, 2008).

**Accreditation.** The current Higher Education Act dictates the regulations that govern how accreditors provide oversight and approvals for institutions. Accrediting agencies has paid employees who carry out the functions and also leverages qualified volunteers to make decisions about the governance of the agency and to determine judgements on the status of institutions under their purview (Eaton, 2012). No matter the accreditor, the process for seeking and maintaining accreditation is generally the same. Institutions develop a self-study, peer-reviewers visit the campus, and a determination for the number of years the accreditation extends is decided (Kelchen, 2017). While accrediting agencies have some leeway in details around the standards they establish, the current Higher Education Act dictates that:



- institutions are required to be accredited by a non-governmental agency that is approved by the Department of Education,
- there are ten standards by which accrediting agencies review institutions: the institution's compliance record, student achievement, curricula, recruiting and admissions, faculty, facilities, fiscal capacity, student support, program length, student complaints,
- accrediting bodies perform regular and ongoing site-visits to review regulatory requirements,
- a summary of the actions taken by the accrediting agency are made available to the public through the agency's website,
- the Department of Education must approve the transfer of an accredited institution to another accrediting agency (Higher Education Opportunity Act, 2008).

Thus, accreditors are held to certain guidelines that greatly impact the universities and other educational enterprises by which they are approved. Over time, accreditation of higher education institutions has become more and more the mechanism for ensuring stakeholders that educational offerings are academically reliable and that students are offered a product that is of value (Hartle, 2012).

There are two types of accrediting organizations: (1) institutional accreditors that are regional, national career-related, or national faith-based agencies that accredit institutions as a whole, and (2) programmatic accreditors that review specific programs or subject areas.

Institutional accreditors review private and public four-year and two-year institutions, graduate education and research institutions, national career-based institutions, multifaceted vocational and professional institutions, and some large training institutions (*CHEA Almanac of External Quality Review*, 2015). National career-related accrediting agencies usually accredit nondegree

or for profit professional and vocational institutions. Regional accreditation has been organized by region, six in total, as institutions throughout the United States had noticeably different cultures and structures, and also because it provides easier travel for peer reviewers (American Council on Education, 2013).

Table 1.

*Number of Institutions Accredited by Accrediting Organization Type and Year*

Institutional Accreditation Type	1999	2001	2003	2005	2007	2009	2011	2013	2015
Regional Accrediting Organizations	3,000	2,946	3,027	2,990	3,025	3,040	3,050	3,049	3,034
National Faith-Related Accrediting Organizations	365	378	395	448	449	462	470	503	498
National Career-Related Accrediting Organizations	3,199	3,160	3,240	3,416	3,532	3,933	4,298	4,344	4,377

(CHEA Almanac of External Quality Review, 2015)

**WASC Senior College and University Commission (WSCUC).** The main purpose of WSCUC, according to its bylaws (Amended and restated bylaws of WASC Senior College and University Commission, 2014), is to “promote the welfare, interests and development of higher education through the continued improvement of educational institutions, close cooperation between colleges and universities within the territory it undertakes to serve, and effective working relationships with other educational organizations and accrediting agencies” (p. 1). More specifically, WSCUC aims to promote institutional engagement in issues of educational effectiveness and student learning; develop a culture of evidence that informs decision making; and foster active interchange among public and independent institutions (Handbook of Accreditation Revised, 2013). WSCUC currently accredits 194 institutions of higher education –

five accredited with notice of concern, three accredited on warning, one accredited on show cause, and one accredited on probation. In addition, there are 13 institutions that are candidates for accreditation with the agency. Of the 207 institutions accredited or granted candidacy status, 43 are public, 30 are for-profit entities, and 134 are non-profit institutions. Of the programs offered under the accredited institutions, 936,908 are undergraduate offerings and 266,954 are graduate offerings. Furthermore, 144,928 are offered in the distance education modality and 1,058,933 are offered in the onsite format (“WSCUC Infographics,” 2018).

WSCUC, one of six regional accreditation bodies in the United States, is comprised of 24 staff members, including general administrative positions and Vice Presidents. Each of the Vice Presidents is assigned a large number of institutions to which they serve as a WSCUC Liaison. The Liaison is responsible for guiding the assigned institutions through processes, including but not limited to, site visits, substantive changes, structural changes, and ongoing reporting (*Accreditation Liaison Officer Policy*, 2018). As a peer review-based body, WSCUC is designed to support a number of committees comprised of representatives from the region which it governs. Seven committees of the commission establish guidelines and processes for institutions: (1) appeals committee, (2) audit committee, (3) compensation committee, (4) executive committee, (5) finance and operations committee, (6) accreditation policy and procedures committee, and (7) structural change committee. The committees of the commission are comprised of elected WSCUC commissioners, leaders in the field of higher education who are committed to serving for a term of three years. Three representatives on the commission are public members. Commission committees meet formally three times annually, and in sub-committees as needed throughout the year (amended and restated bylaws of WASC Senior College and University Commission, 2014). In addition to the committees of the commission,

WSCUC leverages three peer-review committees, who work closely with commission staff, to review institutional reports and proposals. The three committees include: (1) eligibility review, (2) interim report, and (3) substantive change (*WSCUC Committees - Duties and Responsibilities*, n.d.).

As of February 2, 2018, in addition to the guiding Handbook of Accreditation and Substantive Change Manual, WSCUC upholds 47 separate policies. These policies are reviewed and updated periodically under the direction of the Policy and Planning committee of the commission. Updates to policies are formally announced on the WSCUC website, and policy revisions are tracked by date at the bottom of the page. Changes to policies can be major, which are usually put out to the regional community for comment and input, and minor changes that receive less regional input and attention.

In recent years, WSCUC has aligned its policies on public disclosure of outcomes with demands for increased transparency. In June 2010, final decisions on substantive changes and structural changes are posted on WSCUC's website by the commission. Subsequently, since June 2012, commission action letters and evaluation team reports are posted on the website. Finally, effective January 2017, a list of actions taken by the Interim Report Committee, and approved by the Commission, are also posted on the WSCUC website (*Public Disclosure of Accreditation Documents and Commission Actions Policy*, 2016). This move toward higher accountability for the agency increases the stakes for higher education institutions in the regional accreditation process. Every result stemming from a site visit or commission document review is available publicly and shows details of areas where the institution was commended for exceptional work as well as subjects of deficiencies.

**Accountability and Accreditation Reform.** The guidelines in the Higher Education Act impact regional, national, and disciplinary accreditors as well as the institutions they accredit. In the 2015 academic year, there were 7,151 institutions of higher education that were eligible for Title IV financial aid in the United States (*Digest of education statistics 2016*, 2018). Each of these institutions are accredited by either a regional or national accrediting body in order to accept federal financial aid, and are held to certain standards of performance in order to receive approval for continued operation.

With the onset of technological advancements in educational spaces, along with research on optimal learning environments and processes, the landscape of education is changing, yet the rules by which institutions are governed is not. The high-stakes weight that is placed upon institutions as a result of this legislation creates an environment of where institutions must spend more and more funds to support accreditation efforts, even in the wake of current enrollment decreases across the country. Calls for reform to the legislation governing accountability and accreditation of institution exist across both political and advocacy groups. Bouck (2018) posits that the approach used over time, through years of policy change and agreements, to monitor higher education quality is no longer sufficient to meet the needs of the workforce and community. Dunagan (2018) calls for congress to help foster innovation in higher education by having accreditors focus on significant outcome measures including learning assessment, graduation, and return on investment, that are in line with each university's mission. In addition, a report published by Higher Learning Advocates (Bouck & Peller, 2018) provide an alternative to reform higher education accreditation by (1) valuing student outcomes over institutional compliance, (2) increasing the standards for student outcomes, (3) promoting a differentiated model that accreditors can use to alter evaluation methods based on track record, (4) increase

transparency in the accreditation process, and (5) allow accreditors freedom to waive or expedite approval processes so that institutions can quickly respond to workforce needs. Despite the recommended approach to reforming higher education accreditation and accountability, changes to legislation and regulation are an inevitable part of the policy process.

***PROSPER Act.*** Given the assured benefits of a superior education for individuals and society the volume of taxpayer funding for higher education and, the federal government is right to be worried about accountability for all institutions of higher education (Alexander, 2016). The Republican Chairwoman of the House Committee on Education have offered a reauthorization of the Higher Education Act called the PROSPER Act (Promoting Real Opportunity, Success, and Prosperity). The proposed changes being endorsed include the reduction of regulations, simplification of student aid processes, and offers funding for a larger amount of institutions that provide skills training (Harris & Kelderman, 2018). Most importantly, it alters the role of accreditors to:

- institutions are to be accredited by an agency that is approved by the Department of Education,
- accrediting agencies assess institutions based on educational outcomes and student learning as determined by the agency,
- accrediting agencies are required to create definitions and standards for graduation rates, loan repayment, and loan default indicators in order to determine at-risk institutions,
- accrediting agencies may establish their own standards for site-visit cycles, allowing for fewer visits to institutions that are low-risk
- the agency must display adverse actions taken against institutions on the agency's website

- institutions that are at-risk must seek and gain Department of Education approval in order to switch accreditors (Promoting Real Opportunity, Success, and Prosperity through Education Reform Act, 2017).

In order for this alternative to be implemented, it must be passed as part of the currently proposed PROSPER Act, or future versions of reauthorizations of the Higher Education Act would need to include these changes as noted.

To determine the political feasibility of a proposed change in legislation, considerations are made for whether or not the policy, change in policy, or program will actually be adopted (Wiemer & Vining, 2017). In the case of educational policy, especially in the current setting, garnering support from both major political parties need to find consensus. Maintaining a set of standards that was enacted in 2008 is no longer effective or efficient in today's higher education landscape. The result of the current regulations is accreditors and institutions are over-burden with reports and site visits, costing hundreds of thousands of dollars and more. At the same time, student loan default rates are rising and student loan debt is at \$1.5 trillion (Vedder, 2018). In addition, the status quo blurs the lines between the regulation accountability between the accreditor and the Department of Education. The Higher Education Act is to be reauthorized every five years and was due for reauthorization in 2013.

To assess the effectiveness of the accreditation guidelines presented in the PROSPER Act, it will take time once implemented to see the resulting metrics. However, the changes recommended reflect an effort to tackle the problems noted with the status quo, many of which strive to positively impact the level of effectiveness of the accrediting bodies and subsequently, effectiveness in accountability of institutions. The plan seeks to reduce costs to accrediting agencies and institutions alike, as well as initiate a more efficient process by which institutions in

good standing are not tasked with the time-consuming and expensive reporting and visit requirements in as extensive a manner as stands currently. This alternative appears to maintain a foundation of equity for all institutions, focusing metrics more on loan default and repayment indicators. These metrics remain higher for minority students, and this alternative attempts to create standards that protect students from institutions where the degree does not prepare them for the workforce and job placement. The feasibility of this set of guidelines passing within the PROSPER Act is low. Democrats may determine that since 2018 is an election year, it may be beneficial to wait and see if they will take back control of congress later in the year rather than attempt to cooperate on a bill that does not meet their full expectations (Harris & Kelderman, 2018). However, future reauthorization attempts may look to this proposed language for insight.

### **Organizational Change in Higher Education**

The higher education ecology offers a distinctive landscape for exploring organizational change frameworks. While the main purposes of higher education institutions remain the same (instruction, research, and service) there has been a change in how those purposes are accomplished due to the shifting external environment (Bruns & Bruns, 2007). Because of these pressures it is evermore imperative that leaders assess their own institution's landscape, including the institutional structure's ability to handle dynamic change (Bejou & Bejou, 2016), for successful change endeavors. However, Kezar and Eckel (2002) found change strategies not to be meaningful in their ability to guide institutions and facilitate major, institution-wide change. Furthermore, Tagg (2008) argues that universities have stayed the same in many ways while students have changed. Whether change strategies are deployed within institutions or not, remaining stagnant in an evolving environment does not provide a solid base for which an institution can thrive. While some change strategies might not result in a good match for one



university culture and structure, it might make for a better fit within another. Leaders must boldly challenge the status quo as change is happening in the industry overall.

As universities are finding it more and more difficult to justify the distinction of what they do, an emergency of needed change has arisen that has nothing to do with fund shortage or competition, although the latter continues to increase (Considine, 2006) and is another contributing factor influencing changes. Institutions need to continually increase their capacity to be effective and responsive to environmental and policy changes, building a sufficient capacity to record and respond to the real learning experience of students so that when the students change, our colleges can change too, not simply concealing the evidence that would guide change (Tagg, 2008). The imperative for leaders is to identify and isolate the true change initiatives that are priorities; however, the range of priorities required for institutions makes priority-setting difficult even once leaders are able to grasp co-existing initiatives across campus (Kezar, 2009). Establishing a collaborative process, engaging a willing president or strong leadership, or even offering rewards (Roberts, Wren, & Adam, 1993; Taylor & Koch, 1996) should never be underestimated when moving institutions through difficult change initiatives. Furthermore, leaders need to manage to both create and implement interventions that meet the changing policies, yet also identify unintended outcomes that may result from the intervention (Beattie et al., 2013).

Changes over time do indeed occur in higher education institutions - research continually evolves at a quickening pace as does technology (Tagg, 2008), albeit perhaps at a pace that varies across institution types. However, what is being called into question is the lack of change of basic structures and teaching processes under which students learn. Kezar, Gehrke, and Elrod (2015) found that change, specifically based on one STEM oriented initiative, (1) can be

meaningfully created by starting with interventions; understanding the problem is not necessary; (2) is rational, not a political process; (3) is either bottom-up or top-down; (4) meaningful change happens at the departmental level, not the institutional level; (5) data alone can convince people of the need to change; (6) funding is necessary to engage and support any change effort. No matter the size and scope of the change, it is imperative to consider factors that account for the success or failures of initiatives including the structure of the institution and the underlying culture.

**Structure.** “It has often been remarked that movement in a university is glacially slow, but glaciers will seem like rushing streams if no action can be taken that does not first satisfy the expectations of every stakeholder” (Fish, 2015 p. 9). The continual challenge for change initiatives in higher education, is satisfying the inclusion of all internal stakeholders across the institution in the process. A certain amount of *buy-in* is necessary to move forward. Institutions have varying levels of shared governance that is required for decision-making, which greatly impacts the ability for change efforts to move at a fast pace. Researchers even argue that under the current external environment which is creating a certain amount of pressure, the traditional shared governance model is no longer a viable forum by which to make solid decisions in higher education as it is not designed to address multiple, demanding pressures in a timely manner (Bejou & Bejou, 2016). Nonetheless, institutional leaders must take into account their institution’s existing structure and ability to change when contemplating and planning for change. In some instances, education leaders and faculty alike are not fully aware or are even concerned for potential changes; however, this leads to a future of trouble as new markets arise, products and partnerships shift, forcing institutions to evaluate their alignment with such movement (Istieulova & Pelijhan, 2013).

In attempts to make change efforts sustainable, the reality of the turnover in academic leadership as well as in institutional leadership does not bolster the potential for long-term success. On average, higher education presidents are in their role for five to seven years and academic provosts hold their position for around three years. Research shows that deep-rooted change usually takes 10-15 years; therefore, it is imperative for presidents and high-level administrators, including provosts, to delegate or share authority for meaningful change creation (Kezar, 2009). In addition to turnover moving leaders to delegation and inclusion, leaders are seeking to include faculty more and more in institutional decision making, not only to promote a collaborative process, but to appropriately address the external mandates for accountability, the outstanding financial crises, and the changing demographics and technological advances in the industry (Lee & Bowen, 1999; Miller, McCormack, Maddox, & Seagren, 1996) creating a more dynamic internal environment for which to make change. However, Kezar (2009) found that more often, administrators, faculty, and staff are uninformed of the numerous initiatives on their own campuses. The research noted that particularly for larger institutions, it is highly possible that no one individual knows about all of the various change initiatives that are in process at varying phases. Without understanding, or even knowing about the breadth and depth of concurrent projects across an institution, it is difficult to properly assess the current state and direction of an institution from which to base a change strategy.

Organizing a change project within an institution poses some unique tests to mitigate resistance or even intentional disruption. Imposing initiatives as a top-down approach is likely to be met with such resistance merely because of the method. Therefore, understanding how to effectually and authentically involve faculty in the accreditation process is a significant part of the process. When faculty are involved in not only the decision making, but the implementation

of initiatives, a greater understanding and acceptance of those initiatives are fostered (Calegari, Sibley, & Turner, 2015). Some researchers have concluded that for accreditation-driven changes to be sustainable, the administration must actively oversee the process (Jones, 2004; Schein, 2004). This can include bringing groups outside of administrative bodies in early on in the process, through committees and taskforces. In Henniger's (1998) study, faculty concluded that even a dean-driven school-based process to address change resulted in a lack of communication about how other individuals or teams were contributing to the initiative, creating a disconnect across the school. This brings attention to not only the inclusion of different stakeholders in change processes, but the absolute crucial piece that leaders utilize communication strategies as part of all phases – development, implementation, and evaluation. Campus leaders can leverage various technologies to engage faculty and staff alike in the each of these process phases. Often, higher education leaders “hoard” information in an effort to control a situation or to control the information flow across the institution. However, the reality is that in the lack of information, rumor, conspiracy theories, and ultimately real conspiracies dash in to fill the space that would not even have subsisted if full release of information had been the procedure (Fish, 2015). The desire by the faculty for consensus within a department or even across an institution can slow a change process and even put it at a standstill (Bruns & Bruns, 2007).

The lack of reception of faculty to innovations, plans, and strategies continues to be the perception of outsiders, and is proven within higher education institutions. In some instances faculty have been seen to be resistant in self-serving ways, not simply being resistant to change in general (Bruns & Bruns, 2007). There is a continual stream of meaning-making that occurs when change initiatives are set forth. Each individual within the organization looks at the change through their own individual lens, first and foremost, to identify how the change will impact

them. This is why it is ever more vital for leaders to recognize the size and nature of problems early on in the process, and to react in a thoughtful manner that includes faculty (Hilton & Jacobson, 2012). Faculty and administrators alike, can battle against change merely because they do not know what effect the change will have on them (Bruns & Bruns, 2007).

In any organization, a collaborative environment where concerns from any department or sub-group can be openly and honestly addressed is foundational for change initiatives. Most initiatives that are needed in higher education institutions are institution-wide and call for assistance from various levels and groups in order to have the best and most sustainable impact. Chaden (2013) notes that retention and graduation rate improvement initiatives require that faculty be a key component to the effort. However, their combined individual efforts are not sufficient alone – an institutional commitment with significant improvements to areas that impact retention and graduation including, hiring and promotion policies, student support services, faculty workload, and use of technology to fully meet the large scope of such a project is necessary. External motivation caused by changes to accreditation requirements can be one of the ways for institutions to enact such a broad and deep change.

Within a shared governance environment, all stakeholders benefit from “collective deliberations that are based on an open flow of information that replaces adversity with mutual interest and ad hoc decision making with collaborative deliberations and planning” (Bejou & Bejou, 2016, p. 56). Much of the literature on shared governance during the 1960s and 1970s laid the foundation to inform some of the initial structures in higher education including models for dispersing authority, creation of senate bodies, and decentralized systems (Kezar & Eckel, 2005). Building off of this initial research, other scholarship was developed to guide the next generation of governance to account for the changing, more complex environment. For instance, Keller

(1983) offered a Joint Big Decision Committees approach, Alpert (1985) suggested a matrix model that accounted for both internal and external influences related to governance, and Benjamin and Carroll (1998) discussed institutional prioritization and university-wide evaluation standards, yet determined that individual institutions should develop their own governance systems as appropriate. No matter the internal model of governance, change initiatives succeed when ample communication is present. Each institution is unique in its structure as it should be – there is not one model that can be replicated as the model should suit the mission, purpose, and history in addition to its programs and enrollment size as well as its means of funding and relationship to local, state, and national governments (Fish, 2015). Nonetheless, institutional leaders must utilize change strategies that honor and respect all internal stakeholders in order to have the best and highest chance at success.

Some stakeholders view higher education as made up of monopoly organizations providing an indispensable service at a very high quality for many years, persisting to operate in essentially the same way as they always have, impervious to outside criticism and changing only in minor ways (Tagg, 2008). But as time brings more pressure for change, higher education institutions are being challenged to operate in a more fluid environment, requiring more flexibility in its structure and ability to adapt (Bejou & Bejou, 2016). Often, these external pressures and standard changes require a certain amount of participation from faculty, however it is seen as unrewarded service work. In some cases faculty chose not to participate in the accreditation initiative in order to focus their time and energy on efforts that would get them promotions or tenure (Henninger, 1998). Thus, the call is for campuses to agree on a few meaningful priorities that are tied to the institutional mission, local needs, and the cooperative

and united interests of internal stakeholders and foster increased synergy and partnerships between them (Kezar, 2009).

**Culture.** Culture plays an even more important role in change implementation and sustainability. The expectation of cultural change is even more complicated and demanding as it includes that administrators, faculty, and staff rely on solid evidence to guide institutional practice and policies (Morest, 2009). Oftentimes, the institutional culture is reliant on historical process or doing things “the way we’ve always done it.” Thus, the need to assess the institution’s culture and how it impacts the execution of initiatives needs to be explored. Kezar and Eckel (2002) found that change strategies are more likely to be successful if they are culturally articulated or well- aligned with the culture. In order to make such alignments, a comprehensive study of organizational culture in academic settings will demand expanded awareness of elements that determine culture such as use of time by institutions, organizational focus, space, and communication (Tierney, 1988). To this end, those who concede, comprehend, and honor a university’s culture with its valued tradition and priorities can use this knowledge to assemble untapped human resources to gain professional and personal power (Simplicio, 2012) and furthermore the ability to move a change initiative.

Richer descriptions of institutional strategies are provided when cultural approaches are utilized rather than solely based on leader collaboration and support of senior administration (Kezar & Eckel, 2002). The cultural lens also provides leaders with a means for identifying possible unaligned interests. To ease this, a framework can be developed to improve how leaders assess organizational culture to better position themselves for changing components that might be at variance with the culture (Tierney, 1988). Kezar and Eckel (2002) found that within the institutions studied, there was a relationship between institutional culture and change, whether or

not there was an appearance of this connection at the surface. Therefore, the distinct character of the campus cultures cannot be ignored when attempting to understand how change processes unfold and which strategies institutional leaders should accentuate.

### **Organizational Change Models**

Organizational change models provide insight into approaches to change in any organization. Through the framework of these models, research on enacting change can be studied to help understand possible reasons for the success and failures of change initiatives, thus providing a lens for which a single initiative can be viewed. “People are imperfect cogs in the bureaucratic machinery” (Bolman & Deal, 2013, p. 162). When leading change within any organization, one must consider the multifaceted systems that exist within the organization, including the dynamics of the people who work within these systems. Leading change in itself is challenging, even more so in an environment where external pressures drive some of those changes, as accreditation and compliance policies and procedures do in higher education. Nonetheless, Fullan (2001) argues that despite shifting priorities for institutions of higher education, the moral imperative, the central purpose of the organization, is the desire for students to be successful and to gain a positive experience that impacts their lives. Without the willingness of leaders to foster commitment and skills while confronting resistance to change, the organizational change initiative is likely to fail (Vijayabanu & Karunanidhi, 2013). Three change models are presented to review possible application to higher education institutions.

**Burke-Litwin Causal Model of Organizational Performance and Change.** Burke and Litwin (1992) provide a complex model for looking at organizational change in which they provide 12 boxes that represent the important areas of organizational variables for leaders to consider. Each variable interacts with other variables to show a principle of open systems,



meaning that a change in one variable will eventually have an effect on others. These 12 variables include external environment; mission and strategy; leadership; organizational culture; structure; management practices; systems (policies and procedures); work unit climate; task and individual skills; motivation; individual needs and values; and individual and organizational performance (Burke & Litwin, 1992). One of the major advantages of this model is that it rationalizes the meaning of transformation and transactional leadership as well as defines the differences between the two (Spangenberg & Theron, 2013).

The Burke-Litwin (1992) model uses arrows that point between the twelve variables, showing their interaction with one another to convey an open systems principle. The model is more circular than linear as it is a causal model – meaning that a change in one or more of the variables eventually impacts the other variables. The external environment variable sits at the very top of the model, showing its overlying impact on the input into organization. The argument for this placement is that environmental impact is most often the driver for organizational change above any of the other variables. At the center bottom is the individual and organizational performance, which is considered the output. The design of the model to include a variable at each end representing input and output is not to say that these are the only places at which to start or end/assess a change, it is meant to show the transformational and transactional dynamics of change and how they can be weighted (Burke & Litwin, 1992).

While this model is suited for an organization in any industry, it seems useful for higher education organizations in the current climate. Never has it been clearer that the external environment is creating pressure on institutions, resulting in the development of change initiatives, minor to major. Burke and Litwin (1992) describe the external environment to be “any outside condition or situation that influences the performance of the organization (e.g.

marketplaces, world financial conditions, political/governmental circumstances)” (p. 531).

Conditions influencing the performance of higher education institutions are political/government (the reauthorization of the higher education act), financial (declining enrollments and restrictions to financial aid access), and market-place related (consumers are questioning its value).

Dlamini (2013) used the Burke-Litwin (2012) model as part of his study to understand the skills and experience necessary for the role of the Chief Information Officer in higher education, as well as the perception of this position within the higher education environment. He found that the model to be adequately comprehensive as an aid to gather parameters and diagnostics to inform data collection techniques. Dlamini also found the model to be strong for the complex higher education social system in that it postulates a visual metaphor.

Noumair (2013) used the Burke-Litwin (2012) model as a conceptual framework to assess the organizational culture, climate, and interactions within a think tank organization. She found the model to be a rational, non-threatening model for clients. While it was determined to be a good supplement to the psychodynamic approach taken as part of her consultation with the organization, it was proven to help the leaders visualize how pieces of organizations interact and are connected with one another (Noumair, 2013). Johnson (2004) utilized the transformational factors of change from the Burke-Litwin (2012) model to better understand the implementation of quality standards requirements in an organization. Another study used the Burke-Litwin (n.d.) Organizational Assessment Survey (OAS) to diagnose interventions, and found the model itself helpful in concluding that transformational factors and transactional factors – both positive and negative – influence the success of change and performance interventions. Thus, after deploying the OAS tool, researchers posited that leaders should be sure to remained focused on the determined starting point of improvement initiatives (Stone, Brown, Smith, & Jacobs, 2018).

Olivier (2017) used a mixed-methods approach to diagnose the organizational performance of a local government. The research design included measuring the validity of the Burke-Litwin (2012) model as an organizational performance indicator. Results showed that the variables of the model showed convergent validity.

**Kotter's Eight Step Change Model.** After observing hundreds of organizations trying to re-create and re-brand themselves, John Kotter developed an organizational change model that contains eight steps for leaders to follow when undergoing a new initiative. These steps include: (1) Establish a great sense of urgency, (2) create a powerful enough guiding team, (3) have a clear vision, (4) communicate the vision often (5) remove obstacles to the new vision, (6) systematically plan for and create short-term wins, (7) do not declare victory too soon, and (8) anchor change in the corporation's culture (Kotter, 2007). While this model calls for the integration of the eight steps for best use (Appelbaum, Habashy, Malo, & Shafiq, 2012), there are insightful discoveries within each step.

There is more research of the use of Kotter's (2007) model in the higher education setting than that of the Burke-Litwin (2012) model. More recently, a number of studies found Kotter to be a useful tool in planning change initiatives. Carter (2014) found this model to be a valuable tool for enacting change within an academic library; however, the results showed that the use of the model to create and sustain a culture of assessment problematic – not to the fault of the model itself, but possibly due to the expectation of how such cultures grow and perform. Conversely, Farkas (2013) found Kotter's (2007) model to be a practical structure for embedding a culture of assessment into an academic library's culture. She determined that the success was through the model's encouragement of cultural change through leadership, despite the leader's position, and through behavioral changes.

Calegari et al. (2015) used Kotter's (2007) eight-step model to engage faculty members in accreditation activities. They found that the model had many advantages including its provision for focusing on both emotional factors and tangible behavioral characteristics, aspects that are predictably stimulated by change efforts. In addition, the clear yet succinct process recommendations effectively managed and sustained organizational change. On the contrary, the model presented challenges in this study. The researchers found (1) the cycle of the eight steps needed to be repeated, in some cases, to move to the next steps, namely after creating short wins, faculty felt the accomplishment was sufficient, (2) the model does not offer guidance on how to persuade individuals to comply, and (3) while the model is an excellent foundation, it should be adapted to meet the needs and situations of the specific organization and employees working within it. Smith and Stitts (2013), who utilized Kotter's (2007) model as a part of a conceptual framework, used to research action learning and critical thinking tools to make changes in higher education, identify possible individual barriers to change as fear of the unknown, habit, security, and economic factors. Both studies offer a caution to leaders of change initiatives to identify early on such dynamics as individual readiness and willingness to change can derail any project.

**William Bridges' Managing Transitions Model.** William Bridges' (1991) Managing Transition model encompasses three phases: (1) ending, losing, and letting go, (2) the neutral zone, and (3) the new beginning. The focus of this model is not on change which is situational, but on transitions which are psychological – the internalized process individuals progress through as the change brings about new situations. Change occurs in organizations and in the lives of individuals, even if it is not the decision of the people within the organization or the single individual deciding to make the change. Managing transitions, on the other hand, is in tune

with addressing what is happening in the minds of the individuals, as one is removed from an old way of doing things to and plugged into a new way (Bridges, 1991).

As such, the three these stages offer leaders steps and considerations to support the psychological phases that arise from the transition. Phase one – ending, losing, and letting go – urges leaders to help people understand and deal with the loss of old identities, acknowledging that fear and levels of uncertainty accompany this sense of loss. Phase two – the neutral zone – is the time in the middle where the new phase is not fully intact and operational, but the old phase is gone. This is the critical phase where feelings of confusion, uncertainty, and impatience are dominant, and leaders need to take care to ensure that structures, policies, communications, and team dynamics are considered to help mitigate negativity and move people towards the third and last phase. Phase three – the new beginning – is when people come through the transition and there is finally movement into a stage of high energy, openness, and renewed commitment where the new identity is developed. In this phase leaders cultivate the purpose, communicate a clear picture, create a solid plan, and help people understand the part they will and can play in the new beginning (Bridges, 1991).

William Bridges' (1991) Managing Transitions model has been employed in a handful of studies within the higher education setting - some in research within the higher education classroom setting and others at the institutional management level. Robertson (1997) used Bridges' (1991) model in an attempt to college teachers with a model that helps them to facilitate student learners' epistemological transitions, or personal moments of insight that occur during the learning process. The result was a reflective tool to assess and develop the teacher's ability to facilitate the paradigmatic shifts. In a later paper, Robertson (1999) used Bridges' (1991) transitions model to frame a teaching model that analyzed the three teaching perspectives and the

transitions between the three as the college teacher develops as learning facilitator. As part of a case study of an international institution's efforts to restructure a teacher preparation program, Franklin (2015) identified Bridges' (1991) model as a framework for the institution to consider in order to address the issue of levels of fatigue within the organization, coupled with a lack of shared philosophy and vision, and move toward a definitive transition management plan. Lastly, Deane and Asselin (2015) concluded that the use of Bridges (1991) transition model provides the ultimate framework for the movement of faculty to undertake the redevelopment needed to transform nursing education by moving to a concept-based teaching approach.

**Kruger's Iceberg Model of Change Management.** Kruger's (2004) Iceberg model offers an excellent framework under which to study organizational change within a higher education institution. Kruger illustrates his model by comparing the different structures and pressures within an organization as an iceberg – some considerations are above the water, out in the open, while other areas that need to be addressed are “below the surface” (Found, Hines, Griffiths, & Harrison, 2008). Above the waterline is issue management where the leader addresses time, cost, and quality. However, below the surface the leader must attend to promoters, potential promoters, opponents, and hidden opponents. This is to manage to two main areas – perception and beliefs management and power and politics management. The Kruger model shows the area below the surface is the majority of focus, emphasizing the attention needed from leaders to such factors to deploy a successful change strategy (Kruger, 2004).

Kruger's iceberg model of change did not start, however, as an iceberg. It was initially developed as an onion model of change when change categories are positioned according to depth (Kruger, 1996). Nonetheless, the model is still comprised of layers above a mid-point and below the mid-point. Dimensions of change management remain the same in the onion model as

they are portrayed in the iceberg model – management of perceptions and beliefs, power and politics management, and issue management. However, above the mid-line are four layers including restructuring, reorientation, revitalization, and remodeling. These areas are considered subjects and categories of change (Kruger, 1996). Both iterations of Kruger’s (2004) model offer a meaningful and insightful change framework for higher education institutions and leaders. The dynamic and multi-layered structures, both traditional and more progressive, upon which higher education is built, along with special considerations as it relates to culture, tend to foster an environment where promoters, hidden promoters, opponents, and hidden opponents thrive.

### **Use of Accreditation to Enact Change**

Accreditation can be a tool to enact change within an organization. Whether it be regional accreditation that moves an entire institution towards change or disciplinary accreditation standards to force change within a school, division, or department, accreditation can drive the shifts needed to be made in order to comply or meet requirements at a reasonable level for sustained achievement. Accreditation can influence the operations of an organization because it provides an external pressure that is either mandatory or voluntary (Morest, 2009). It also can have an impact on organizational culture through institution’s needs to implement organizational effectiveness measures (Lejeune & Vas, 2009) and promotes increased attentiveness to ethics, social responsibility, and sustainability (Cooper et al., 2014). It has even been shown as an exogenous power to inspire positive social change (Rubaii, 2016).

Organizations do change as a result of and in preparation for accreditation (Shaw, Groene, Mora, & Sunol, 2010). The idea that accreditation is a significant *normative mechanism* that can lead to institutional change, thus when accreditation changes so then do organizations, is a contentious argument (Scott, 1995). However, organizations do need to change as regional

accreditation standards change in order to remain in business. Murray (2010) found that 91% of two-year college presidents felt that there was either a great deal or a moderate amount of desirable change that accompanies the regional accreditation process. One of the larger challenges then becomes taking the accreditation requirements and translating them in a way that is clear and concise for the institution while also allowing for the adoption of the standards to include overall institutional logic. This often results in an effort towards a quality continuous improvement cycle that benefits its customers, namely students, yet creates internal standardization to some extent and bureaucratizes aspects of university management (Ahrens & Khalifa, 2015).

Exploring accreditation as a means to enact change resulted in both general and more specific empirical studies where this occurred. While there is strong evidence that institutional factors influence organizational responsiveness to changes in normative standards (Casile & Davis-Blake, 2002) exogenous pressure combined with human praxis enables those committed to the changes more able to instigate them (Cooper et al., 2014). In some instances, the potential economic impact alone of accreditation had predicted positive effect on responsiveness to new accreditation standards (Casile & Davis-Blake, 2002). Furthermore, as accreditation criteria call for institutions to explicitly address data points such as retention and degree completion, those who show deficiencies in these areas will have increased scrutiny from their accrediting agency (Chaden, 2013). Bardo (2008) identified five trends that impact institutions, resulting from the changing climate of accreditation: (1) creating an evidence- and assessment-based culture, (2) integrating the institution's strategic plan with accreditation requirements and processes, (3) changing institutional policies and organizational structures, (4) evaluating the costs connected to accreditation, and (5) addressing nontraditional and transfer student enrollments. Rivas and Jones



(2014), on the other hand, reviewed change processes spurred by accreditation through the lens of Kubler-Ross's five stages of grief model and Lewin's (1947) change theory to identify that for a change to be impactful leaders must create awareness at the beginning and to as many individuals as possible, establish open communication, be flexible when developing infrastructure, and create timelines for short and long term goals.

**Self-Study.** As part of most accreditation and reaffirmation processes a self-study is included. The self-study process design allows for the institution to tie together the mission and values of the organization to the experiences of the students and employees, the established policies and processes, and the strategic goals (Martin, Manning, & Ramaley, 2002). Institutions are to use this process to conduct campus-wide thinking and conversations about the university's future and, from those discussions and subsequent development of documents as part of the accreditation process, the university then reflects on what it learned about itself (Martin et al., 2002). According to Dodd (2004) self-assessment is the most central part of the self-study process as it greatly directs the plans that are produced for institutional improvement and program renewal that, in turn, lead to organizational effectiveness and accountability. For example, one institution endeavored to implement a more distributed mode of leadership as a result of the self-study and strategic change process, creating a learning organization (Martin et al., 2002) – one that continually facilitates the learning of its members in order to transform itself. Almuhammadi (2017) found the self-study process to lead to the implementation of quality assurance processes that are also maintain thereafter, in order meet the requirements of an internationally recognized commission. The self-study process, as part of initial approval and re-approval in accreditation processes, encourages the institution to improve quality of offerings and processes, increase its effectiveness, and endeavor to move toward excellence makes it a

simple yet profound process. It can call into question the established routines of organizations, unbalancing them (Martin et al., 2002) and creating a space to challenge status quo. Lejeune, Schultz, and Vas (2015) found that a mirroring process, used during the self-assessment of a program, led to a positive quality assessment process outcome. Boozing (2016) found the self-study process, along with a motion of noncompliance by the accrediting agency, helped an institution restructure their outdated governance configuration.

**Quality and assessment of learning.** Where accreditation has made an immense impact on institutions is in the area of teaching and learning, more specifically in assessment of and for learning. The movement of accreditors towards learning outcomes and evidence of student learning has created not only great debate amongst and within institutions, but has garnered much change across educational organizations globally. There is precedent for accreditation standards being a driver for positive institutional change, most remarkably in the assessment of students' learning (Chaden, 2013). Assessment, resource allocation, and institutional planning can be guided by accreditation standards as these standards represent best practices within the industry (Dodd, 2004). Assessment of student learning not simply based on satisfaction or teacher evaluation forms is the expectation of institutions. Experts agree that, because of the requirements passed down by the accreditors regarding student learning, any meaningful assessment of students' learning unavoidably includes direct assessment of student artifacts produced in classes across the curriculum for a particular program (Chaden, 2013). Not only are ranking and image of the institution enhanced by obtaining accreditation, but it also is a sign of quality teaching and results (Almuhammadi, 2017). Furthermore, in Collins' (2015) study institutional members who participated in the accreditation process found it to be a good means for improving management of programs but also increasing educational standards. As accreditors

continue to refine requirements for higher education institutions to demonstrate learning goals for each program, directly assess the degree to which students are meeting these goals, and use this information for program improvement (Chaden, 2013), institutions will need to continually refine internal processes and align professional development opportunities for faculty to authentically meet this standard.

**Mission and identity.** One of the major pieces of consideration in accreditation criteria is the alignment of the institution's mission, or school/program mission for disciplinary accreditation, with its policies, processes, and overall actions. This requirement for groups to explore their identity and purpose challenges the units to make changes with the aim of becoming accredited (Lejeune et al., 2015). The research shows this part of the self-assessment towards the mission most prevalent in business school accreditation. The most recent AACSB-IME standards indicate that schools will be evaluated based on the alignment of the policies, curricula, educational programs and practices with the business school's mission. This forces the institutions to have a clear comprehension of who they are, want to be become, what knowledge and characteristics they want to foster in their students, and who they serve in totality (Smith & Khojasteh, 2007). In their study, Istileulova and Pelijhan (2013) found the mission statement review to be a large part of accreditation efforts, on top of creating and implementing measurements for the learning goals of the programs as well as decreasing faculty to student ratio. Lastly, as result of accreditation requirements, one program's development of a new mission resulted in impactful changes in all the main areas of the program, including curriculum modifications, recruitment and professional development of faculty, teaching approaches, governance, and student affairs (Almuhammadi, 2017).

**Other changes.** Pressures from business school disciplinary accreditors have shown to influence strategic decision-making of schools that enter into the process. However, Julian and Ofori-Dankwa (2006) believe that these types of accreditation standards increase the probability of insignificant strategic decision-making because of the environments created in business schools themselves – turbulent and hypercompetitive. Conversely, another set of researchers found that the business accreditation process identified the need for the school to strengthen financial resources and introduce entrance requirements – both helping the school provide a basis to implement improvements and planned activities (Istieulova & Pelijhan, 2013). In the Lejeune (2011) study, which explored a different business school accreditation, results showed that when a capability-based model was applied, there was a clear understanding that sustained quality improvement could occur when two demands for improvement exist: (1) benchmarking in the accredited group increases – other business schools continue to improve and (2) pressure internally from constituents to continue progressing and innovating in the areas of quality and quantity.

Collins (2015) found that accreditation processes helped to change professional development, performance management, the increase of needed record-keeping, and the allowance of extra-curricular activities. Moreover, Cooper et al. (2014) found that their organization's efforts to attain accreditation resulted in the implementation of a number of changes including social responsibility issue integration across stakeholders for increased engagement and sustainability. Other research found that an institution used accreditation standards to address problems that had been well-documented. In addition, recommendations stemming from accreditation visits, aligned to well-known themes encouraged by the accreditor, to request organizational change initiatives that would both meet the requirements and benefit

the institution. These changes included requests for faculty to have additional research time and leaders pursuing documentation of pedagogical techniques (Ahrens & Khalifa, 2015).

Accreditation has also shown to have an effect on transparency in operations of a class offering. In addition with these changes, it also helped the leaders increase accountability as well (Collins, 2015).

Pomey et al. (2010) found that accreditation was an excellent tool for a health care organization to (1) increase the speed at which merged organizations integrate and cooperate; (2) commence programs for continuous quality improvements in organizations that are seeking accreditation or are newly accredited, (3) establish new leaders to shepherd improvement initiatives; (4) foster an environment where staff can develop relationships with one another; and (5) nurture relationships between the organization and its stakeholders. However, the study also found that these motivating factors brought about by accreditation diminished over time. In the Lejeune et al. (2015) study, which analyzed the impact on the accreditation's impact on embedding the vision of the organization into its practices, saw changes that included a creation of centers of excellence in the discipline, the reorganization of leadership and request for a management team, creation of an advisory board comprised of members from the discipline as well as industry, research incentives, and an international foundation.

**Call for the development of accreditation standards.** In industries where accreditation bodies and, subsequently, sets of standards or requirements do not exist on a regional or national level, the call for the development of such standards is growing. There are many efforts underway to create such systems. Some call this an urgent need that cannot be ignored. "If we do not proceed with a constructive approach guided by the knowledge and experience of medical education experts from around the world, administrative approaches may begin to dominate with

possible inconsistencies and inadequacies in meeting educational and changing societal needs” (Rezaeian, Jalili, Nakhaee, Shirazi, & Jafari, 2013, p. 153). Other researchers have called for an initiative to launch standards where the foundation is social accountability. They argue that without this foundation, accreditation approaches can neglect the obligations to society that institutions, and countries, have (Boelen & Woollard, 2009). Rubaii (2016) found that international accrediting agencies that review and approve public affairs programs tend to emphasize social equity and diversity more than other agencies that are nationally-based. Perhaps this calls for national and regional accreditors to consider reflecting such standards and attention in their own policies and requirements. Lastly, Chaden (2013) calls for accreditation requirements to exist because of three positive and exceptional reasons: (1) national conversations about learning and degree completion in higher education institutions which lead to strong reasons for changes institutional behavior can be spurred by pointed external requirements, (2) institutions need the guidance of accreditors and the advice of professional organizations to implement standards appropriately and in a meaningful way which shows a sincere understanding of the underlying reasons for the standard, and (3) standards that make sense and are reasonably presented create genuine engagement from faculty and staff who are intellectually curious.

## **Chapter 2 Summary**

The higher education landscape is one that is shifting and is thus calling into question the purpose of a degree, and those that hold accountable the institutions that grant them. The prominent changes taking place in the higher education environment include: (a) heightened demands for accountability, (b) new forms of instructional delivery, (c) new educational providers and programs, (d) new students and new patterns of attendance, and (e) the

globalization of higher education (American Council on Education, 2013). Which such mounting pressures, regional accrediting agencies are making changes to standards and policies to align with these changes. As such, institutions are being challenged to shift their practices to meet such changes in requirements. Creating change within an institution is not easy – even when placed upon it from an external force. But remaining idle is no longer an option for institutional survival.

This review of literature sought to provide a foundational theoretical framework for this study as it relates to the four research questions. An overview of accreditation and accountability in higher education show the extremely complex web of policies and regulations that dictate much of how higher education institutions must function on an operational and academic basis. Through the analysis of the history of the Higher Education Act and its major areas such as Title IV, it is clear that any change to these policies directly impacts regional accrediting bodies, and subsequently the institutions they accredit. In providing context around accreditation reform and the reauthorization of such policies and regulations that are on the horizon, the literature presents the need for institutional leaders to be on the ready for future changes.

In line with research question one and three, the literature review explored how institutions have used accreditation to enact change through the use of accreditation activities including self-study development, assessment of learning requirements for programs across the institution, and a review and realignment of mission and identity. Other changes identified as a result of accreditation were in areas of increased financial resources, a re-focus on professional development, and internal relationship-building. These efforts were evaluated internally for success and also by the external accreditor through document review and site visits. Through

analyzing how others have used accreditation, both regional and disciplinary, leaders can mirror successful changes on their own campuses.

This chapter also uncovered background on organizational change in higher education – the landscape upon which change can or cannot occur and the factors that contribute to the ability and likelihood of occurrence – in alignment with the second research question. Although the literature identified ways in which changes can be instituted across college and university campuses, the structure of the institution has great impact on the speed at which these changes can be solidified. Higher education is known for moving at a slower pace, almost refusing to keep up with the cadence of any other industry. The structure of the institution, to include governance bodies, leadership turnover, and internal policies and practices, greatly impact change. In addition, it was clear that culture plays an even more imperative function in the ability of institutions to maneuver as needed.

Lastly, in line with the fourth research question, this literature investigated four change models that might serve as means for enacting change as a result of changing accreditation policies. Kotter's eight step change model is linear in design, clear, and begins with a sense of urgency in step one (Kotter, 2012). This sense of urgency could quite possibly stem from a change in accreditation policy and the need for the institution to change as a result. Kruger's Iceberg Model of Change (1996) calls for the consideration of promoters and opponents which may or may not be hidden, identifying areas where change agents could potentially stumble. Bridge's Managing Transitions Model (1991) offers guidance of the psychological aspect of change, and Burke and Litwin (1992) developed a change model that prioritizes external pressure, such as accreditation, to spur change within an organization. The review of literature in



these four areas provides the context and support for this study, and sets the theoretical lens through which the research will be undertaken.

## **Chapter 3: Research Design and Methodology**

### **Introduction**

The purpose of this study was to examine the strategies, challenges, and best practices used to operationalize changes in internal practices and processes as a result of changes in accreditation policy. The lived experiences of Accreditation Liaison Officers (ALOs) who serve at higher education institutions in the WASC Senior College and University Commission (WSCUC) was gathered and organized through a qualitative research design utilizing a phenomenological approach (Creswell, 2013). This chapter describes the procedures of qualitative research design and phenomenological approach and its appropriateness for this study. The nature of the study, description of the population, selection criteria, and analysis unit are also presented. Processes used to ensure validity and reliability, including researcher bias, are offered. Finally, the chapter illustrates an overview of the interview techniques and protocol undertaken along with the approach used for data analysis.

### **Re-Statement of Research Questions**

This chapter describes the research methods that were applied to achieve the objectives of this study, which was to primarily answer these four research questions:

***RQ1*** - What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?

***RQ2*** - What challenges do higher education institutions encounter in implementing changes in accreditation policy?

***RQ3*** - How do higher education institutions evaluate the success of operationalized changes in practices and policies?

**RQ4** - What recommendations would higher education institutions make for future implementation of accreditation policy changes?

### **Nature of the Study**

This study utilized a qualitative approach to appropriately address the research questions outlined. “Study designs in qualitative research are more appropriate for exploring the variation and diversity in any aspect of social life – studying values, beliefs, understandings, perceptions, meanings, etc. - qualitative study designs are more appropriate as they provide immense flexibility” (Kumar, 2014, p. 133). Creswell (2014) declares that researchers who engage in qualitative research methods promote an emphasis on research that respects individual meaning, and inductive approach, and values the representation and interpretation of complex situations. In addition, qualitative research design is a good approach to studying and improving one’s own practice (Merriam, 2009).

Creswell (2013) states that “qualitative research begins with assumptions and the use of interpretive/theoretical frameworks that inform the study of research problems addressing the meaning individuals or groups ascribe to a social or human problem” (p. 44). Qualitative research occurs in reality or the natural world, uses human-based and interactive methods, emphasizes context as a focus, allows for the emergence of new information, and is, at its core, interpretive (Marshall & Rossman, 2016). Merriam (2009) asserts that there are four overall characteristics of qualitative research: (1) the purpose is to attain an understanding of how people make sense out of their experiences, outline the process of meaning-making, and describe how people interpret what they encounter, (2) the researcher is the primary instrument for data collection and analysis (3) often the qualitative method is chosen by the researcher because of a

lack of theory or an existing theory fails to adequately explain a phenomenon, and (4) the product of qualitative inquiry is deeply descriptive.

There are five approaches used in qualitative research design as described by Creswell (2013). The first, grounded theory, is a research design that moves beyond a narrative to create or discover a new theory. A large number of participants interact with the researcher and the inquiry moves the researcher toward generating an action, process, or interaction that is formed into a general explanation. Ethnography, on the other hand, usually based on a large group of people, is a study on a culture-sharing group who interact over time. A narrative qualitative approach is where the researcher collects stories from people about their lived experiences or, from which a collaborative story is constructed from those experiences. Types of narrative studies include biographical, autoethnography, life history, and oral history. The case study approach studies a real-life setting, or contemporary bound system, and is done for intrinsic study where the case has an unusual interest, or an instrumental case where the study where the selection of the case is done in order to solve a problem. Finally, phenomenology, is an approach by which the researcher studies a phenomenon, or lived experience, to make meaning, draw conclusions, and describe commonalities (Creswell, 2013).

One of the most compelling arguments for the use of qualitative research design is that it's strengths are that it is descriptive or exploratory, focuses on the setting and context, and quests for a deeper understanding of the phenomenon and lived experiences that are examined in the study (Marshall & Rossman, 2016). Furthermore, qualitative researchers tend to subscribe to the importance of comprehending the theories and beliefs that inform the research study and acknowledge these as part of the active writing process and development of the final report (Creswell, 2013). Merriam (2009) argues that research focused on unearthing, awareness, and

understanding from the perspectives of the group being studied results in the best possibility of making an impact on people's lives.

## **Research Methodology**

This study utilized a phenomenological approach in order to address the research questions. Phenomenological study is the shared meaning for several individuals of their lived experiences of a concept or a phenomenon. The foundational purpose of phenomenology is to condense the experiences of individuals with a phenomenon into an account of the universal essence of that phenomenon (Creswell, 2013). Husserl, known as one of the founders of the pure phenomenology method of qualitative research states, "natural knowledge begins with experience and remains within experience" (Husserl, 2002, p. 9). With the realization that knowledge is exemplified in solid or *empirical* science, a phenomenological approach seeks the baseline of the scientific knowledge (Lyotard, 1991). The phenomenological researcher adheres to the underlying principle that each individual event has an essence that can be comprehended in its *eidetic purity*, and in this purity it must belong to a field accessible for eidetic inquiry (Husserl, 2002). It is often argued that the major contribution of phenomenology is the means in which it has unwaveringly protected the subjective view of experience as an essential part of any complete understanding of the nature of knowledge (Moran, 2000).

The phenomenological interview is the main method of data collection in order to get at this essence or foundational primary structure of the meaning of an experience (Merriam, 2009). Phenomenological interviewing is a particular type of in-depth interviewing grounded in the philosophical underpinnings of phenomenology and rests on this assumption that there is a structure and essence to shared experiences that can be described. The purpose of this type of interviewing is to narrate the meaning of a concept or phenomenon that several individuals share

(Marshall & Rossman, 2016). More specifically, semi-structured interviews offer opportunities for empirical application in studying experiences because the researcher can inquire about situational meanings or reasons actions were taken in addition to collecting information on theories and self-interpretations (Flick, von Kardoff, & Steinke, 2004). Semi-structured interviews allow for participants to respond with a certain amount of latitude. In this type of interview, the researcher has a plan for the topic or experience to be discussed, but is not required to maintain a fixed order of questions (Packer, 2011). This research study utilized a semi-structured interview approach to data collection. The phenomenological interview approach allowed the researcher to seek out strategies and practices used by Accreditation Liaison Officers in operationalizing accreditation policies. In addition, this approach offered the researcher the ability to investigate the challenges experienced and recommendations made for processes and practices. Furthermore, semi-structured interviews helped the researcher explore the participants' shared experiences in order to understand and describe the essence of the experiences discussed.

### **Research Design**

This research sought to understand the challenges, strategies, and best practices exercised at higher education institutions to meet regional accreditation policy requirements. The analysis unit was designated Accreditation Liaison Officers at regionally accredited colleges and universities in the WASC Senior College and University Commission region. The study explored their lived experiences by employing a phenomenological interview technique (Creswell, 2013). In addition to the criteria for inclusion outlined below, characteristics of in the unit of analysis included both male and female participants ranging in ages from 25 to 75 who preside in the United States.

**Sample size.** Marshall and Rossman (2016) suggest that the consideration of sample size be completed concurrently with the determination of data method utilized. Similarly, the disciplinary purpose of the research should be carefully deliberated and used to influence the sample size of a given study (Morse, Swanson, & Kuzel, 2001). There are ranging views in the literature that define the appropriate sample size for qualitative phenomenological interview research designs. Creswell (2014) states that, depending on the qualitative research design, samples can vary from two to thirty human participants, yet in a phenomenological study the size is typically three to ten participants. In other publications both Creswell (2013) and Polkinghorne (1989) have recommended a sample size of five to twenty-five participants. Morse (1994) recommends at least six participants in a phenomenological study. The goal of developing a sample size that is appropriate to any study is to reach the point at which saturation is achieved. While the concept of saturation comes from a grounded theory method of qualitative research, it can still be a meaningful consideration in this phenomenological study. Saturation refers to the idea that the researcher collects data up to a point where gathering additional data does not produce new insights or properties (Creswell, 2014). While researchers are unable to predict the number of participants required to achieve saturation in a study, the number is contingent on the study scope, quality of interviews, participant selection process, and data collection analysis approach and style (Morse et al., 2001). In alignment with the literature explored on sample size and obtaining saturation, the sample size for this study was between eight and twelve participants who meet the criteria for inclusion.

**Participation selection and sampling technique.** The population who was studied are designated Accreditation Liaison Officers employed at higher education institutions that are regionally accredited and in good standing in the WSCUC region. Accreditation Liaison Officers

are defined as an appointed individual at the institution who is responsible for understanding WSCUC standards, policies, procedures, reporting requirements, maintaining accreditation files, and ensuring clear communication about WSCUC requirements is undertaken across the campus community. They are also the main point of contact with the regional accreditor (*Accreditation Liaison Officer Policy*, 2018). WSCUC accredits public and private four-year post-secondary institutions in California, Hawaii, the Pacific Basin region, and some institutions outside of the United States.

Participant selection was approached using a purposive sampling technique. This tactic is based on the investigator's desire to discover, comprehend, and gain insight about a specified experience and therefore needs to choose a sample from which the greatest amount of information can be learned (Merriam, 2009). "To purposefully select participants means that qualitative researchers select individuals who will best help them understand the research problem and the research questions" (Creswell, 2014, p. 189). Typically, this approach renders a sample that reflects the average condition, person, or occurrence of the phenomenon of interest (Merriam, 2009). This approach was used as the study seeks to explore a given phenomenon through the lived experiences of Accreditation Liaison Officers within institutions of higher education. To enact this approach, three steps were used towards the selection of participants. First, the researcher created a master list, or sample frame, with demographic information on each institution holding any level of status with the WSCUC accrediting body, matched with accreditation report and review timelines and results. Secondly, the researcher established criteria for inclusion and exclusion to reduce the number of possible participants by applying specific requirements for achievement of an appropriately aligned sample. Finally, the researcher applied criteria for maximum variation.



***Sampling frame to create a master list.*** Contact information for all ALOs in the WSCUC region is publicly accessible on the WSCUC website. Institutions are required to keep current contact information about key personnel updated on the public-facing website. In addition to contact information, scheduled dates of upcoming reviews are also posted on the WSCUC website. In order to create a master list to establish a sampling frame for this study the following strategy was employed:

1. The WSCUC institution directory was accessed and downloaded using the export feature. The director contains the name, accreditation status, website, full-time equivalent student enrollment, address, year granted initial accreditation, and the WSCUC staff person who serves as the institution's liaison. This information was saved in an excel spreadsheet. An additional column was added to delineate a "yes" or "no" for international status. This process generated a list of 210 institutions.
2. A separate directory containing a list of upcoming reviews for institutions was accessed through the WSCUC website. This list includes information on seasons (Fall or Spring) with year for accreditor-dictated reviews. The reviews include offsite review, mid-cycle review, and accreditation visit. These dates are based on the most recent commission action from an initial or reaffirmation of accreditation review as described in commission action letters posted publicly on the WSCUC website. This information was saved as an excel spreadsheet.
3. The two excel spreadsheets containing information about the institutions that hold standing with WSCUC was combined into one file using multiple VLOOKUP functions, thus creating one master sheet.

4. Two additional columns were created in order to have all data points needed in order to filter the population as needed. These three columns were “most recent accreditation review season”, “most recent accreditation review year”, and “accreditation years attained.” Using the mid-cycle review dates in combination with publicly posted commission action letters, the researcher was able to enter data into these columns.

The results stemming from these four steps allowed the researcher to use filter functions in excel to apply criteria of inclusion and create a final list of institutions that were considered as participants for this study.

***Criteria of inclusion.*** Participation was limited to one individual who represents one institution of higher education. The inclusion criteria will require that:

- Participants are designated Accredited Liaison Officers at a college or university in the WSCUC region;
- Participants are employed at an institution that is accredited and in good standing with WSCUC;
- Participants are employed at institutions that are multi-disciplinary (university or college that offer programs in more than one discipline);
- Participants are employed at institutions that have a full-time equivalent (FTE) student enrollment of at least 300;
- Participants are ALOs at institutions that are Title IV federal financial aid eligible;
- Participants are ALOs at institutions that are located in the United States;
- Participants do not maintain a personal or professional relationship with the researcher.

***Criteria of exclusion.*** Institutions that hold an accreditation status of Candidate, Accredited with Notice of Concern, Accredited on Warning, and Accredited on Probation were not be included in the study. While WSCUC accredits institutions outside of the United States, institutions located outside of the country were not included in the study. Furthermore, ALOs at institutions with a small student population, under 300 full-time equivalent enrollment and single-disciplinary institutions were not included. Institutions who have not received reaffirmation of accreditation within the declared timeframe of eight or ten years were not included. WSCUC also grants reaffirmation for six years or less depending on the severity of the institution's inability to show an acceptable number of standards are met. Due to the potential for bias, institutions within the researcher's own university system that reside within the WSCUC region, of which there are three, were not included in the study. Furthermore, the researcher's institution where she is a current student was not included in the study. Lastly, in order to remove any possible potential for bias, the sample did not include participants with whom the researcher has a personal relationship.

***Maximum variation.*** In addition to creating a set of criteria for inclusion and exclusion this study employed techniques for maximum variation. The purpose of maximum variation – documents diverse variations and identifies important common patterns (Marshall & Rossman, 2016). Maximum variation sampling involves identifying and seeking out participants who represent the widest possible range of the characteristics of interest for the study (Merriam, 2009). To warrant maximum variation in this study, participants were selected from public, private non-profit, and private for-profit institutions across California and Hawaii. Furthermore, the institutions ranged in providing varying levels of post-secondary degrees, including baccalaureate, master, and doctoral programs spanning all fields of study. Accreditation Liaison

Officers interviewed will consist of a diversity of age, gender, race, and experience in the position. The researcher contacted potential participants who hold these positions currently. In addition, the researcher is a member of a listserv with many accreditation professionals who hold the designation of ALO at their respective university. Follow up emails could be communicated through that network of contacts as needed.

### **Protection of Human Subjects**

Research ethics are an important consideration in any research study. When ruminating on ethics surrounding a study, “typical questions, which are also regularly asked in qualitative research, include the following: the question of how voluntary was participation in the investigations, the question of guaranteeing anonymity and confidentiality, or the question of the admissibility of undercover forms of observation” (Flick et al., 2004, p. 334). To ensure the protection of human subjects in this research study, the guidelines and protocols of the Institutional Review Board (IRB) will be observed. Each university campus that sponsors research projects employs an IRB whose committee is responsible for the review of research proposals and determine their potential harmful impact on participants as well as any risk posed to the participant in the research design (Creswell, 2013). Pepperdine University’s IRB was engaged upon the approval of the dissertation committee to move this research study forward. Upon consultation with the IRB, an application for exempt review was completed and processed by Pepperdine IRB staff in line with regulations outlined by the federal government for human subject protection. This study posed minimal risk to participants as participation is completely voluntary and precautions were taken to ensure anonymity.

Due to the proposed nature of this study, participants who elected to participate were provided with and Informed Consent for prior to the interview date and were asked to review it

(Appendix C). According to Federal Code 45 CFR 46.116 Subpart A (Basic HHS policy for Protection of Human Research Subjects, 2018), the Informed Consent will include:

- A statement that the study involves research
- An explanation of the purposes of the research
- The expected duration of the subject's participation
- A description of the procedures to be followed
- Identification of any procedures which are experimental
- A description of any reasonably foreseeable risks or discomforts to the subject
- A description of any benefits to the subject or to others which may reasonably be expected from the research
- A disclosure of appropriate alternative procedures or courses of treatment, if any, that might be advantageous to the subject
- A statement describing the extent, if any, to which confidentiality of records identifying the subject will be maintained (n.p.)

Thus, the Informed Consent provided participants with the following information about the study: (1) its use as partial fulfillment toward a doctoral degree at Pepperdine University, (2) a statement of the purpose of the study, (3) overview of the methodology used to conduct the research study including the interview process, (4) a statement about the researcher's commitment to confidentiality including a description of how the data will be stored and destroyed, (5) and a review of potential risks involved with the participant's role in the study, reiterating the voluntary-basis by which participants were engaged.

## **Data Collection**

Prospective participants received an email requesting participation in a study about how post-secondary institutions in the WSCUC region develop internal policies, processes, and practices to meet changes in regional accreditation policies (Appendix B). The email included a brief description of the research study, the timeframe for data collection, and the amount of time that would be needed of each participant. Respondents who articulated a willingness and ability to participate were provided the Informed Consent document which included information as outlined in the previous section.

Interviews with eligible participants were conducted using the videoconferencing software, Zoom. Given the nature of the dispersion of participants, utilizing videoconferencing software allowed the researcher to interview participants across the WSCUC region within the projected timeframe for data collection. In addition, interviews were recorded and transcribed within Zoom for ease of data collection. If the participant was unwilling to have the interview session recorded, the researcher took copious notes. Interviews were scheduled in January-March of 2019, per IRB approval, and lasted approximately 60 minutes.

At the beginning of the interview participants were provided an overview of the terms and conditions of their participation, as outlined in the Informed Consent. Participants were reminded that their identification was known by the researcher and pseudonyms were used in the research study to represent the participant and his or her institution. While the interview was conducted using videoconferencing software and the researcher utilized the camera feature, the participant had the option of using the audio feature only. Interviews were confirmed within 24 hours of the agreed upon time and date. The confirmation email included the link to the videoconferencing software, including instructions for set-up, and the Informed Content form.

The email also contained the researchers contact information and a description of the scope of the interview and approximate length.

Recorded sessions were stored for 48 hours in the secure Zoom cloud system. The reason for this is the ability for Zoom to transcribe the interview within approximately four hours of the closing of the session. Zoom's security infrastructure is more than adequate to confidentially store recordings and transcriptions (*Security Guide*, 2017). The researcher then downloaded the recorded session and transcription and stored them on a computer hard drive. The recorded session and transcription were deleted from the Zoom software immediately following storage on the hard drive. The transcription of the interview was reviewed by the researcher immediately following the interview to ensure accuracy and the redaction of unintentional use of names or institutions were used. All handwritten notes, memos, or printed transcriptions will be kept in a locked safe at the home of the researcher. These recordings and hard-copy records will be destroyed after three years. Each participant was provided the option to receive a copy of the final research study upon completion.

### **Interview Protocol**

Packer (2011) describes six characteristics of the semi-structured qualitative research interview: (1) it is a scheduled event (2) often takes place between two people who do not know one another, (3) is not an interface between equals – there is a clear distinction between interviewer and interviewee, (4) it is conducted for a third party (5) interviewers often adopt a less casual attitude (6) it is generally not a back and forth about the present time – it is more historical in nature, collecting accounts or descriptions. Semi-structured interviews allowed the researcher to adhere to a list of interview questions, but ask supplementary questions to dive deeper in the emerging accounts and themes of the interviewee, gather new ideas on the topic,

and to respond to the conversation at the time (Merriam, 2009). Other advantages include the appropriateness in researching complex situations, usefulness for gathering in-depth information, information collected can be supplemented, questions can be explained, and can be used with almost every population (Kumar, 2014).

This study followed the interview protocol set forth by the Pepperdine IRB. The description of the process that were followed by the researcher to ensure alignment with the established protocol is outlined in the subsequent sections. In addition to creating a set of interview questions and interview techniques supported by the literature, an outline of the process used to portray the reliability and validity of the study are provided.

**Interview techniques.** This qualitative phenomenological research study utilized semi-structured interviews for data collection. As such, it was important to establish a thoughtful interview protocol prior to engaging participants in the study. Kumar (2014) states that “interviews are a person-to-person interaction, either face to face or otherwise, between two or more individuals with a specific purpose in mind” (p. 176). One of the main advantages of an interview is that it allows the researcher to enter into a line of questioning with participants to gather information on past experiences when the participants cannot be directly observed (Creswell, 2014). An interview instrument was used, however the researcher asked follow up questions as needed for deeper discussion and further clarification or reflection, creating a semi-structured interview protocol. Flick et al. (2004) provides five stage directions for conducting interviews:

- explain the framework to your subject in good time. In a “briefing,” the following points have to be made clear: what is the issue and how the interview will be done,
- create a good atmosphere in the interview,



- giver your counterpart room to open up,
- give the “drama” an opportunity to develop – through question design for stimulation, and
- in the interview do not attempt to discover theoretical ideas but the life-world of your counterpart – let the subject explain concepts, procedure, situations (p. 212-213).

In accordance with the literature, one week prior to the scheduled interview the researcher sent the participant a reminder, confirming the appointment time. The email included the contact information of the researcher, an attachment containing the Informed Consent, the date and time of the interview, the link to the zoom session to be used to conduct the interview, and information on the scope of the interview. The researcher logged into the Zoom interview 10 minutes before the scheduled interview time to ensure the technology features are working adequately. For participants who agreed to be recorded, a back-up recording device was with the researcher and was available for use in the event of a technological failure.

Prior to beginning the interview, the researcher reviewed the information contained on the Informed Consent, including the purpose of the study, the expectation of the duration of the interview, the ability and pursuit of the researcher to ensure confidentiality, potential risks to the participant with a reminder that participation is voluntary, and the ability of the participant to receive a copy of the final report upon its completion. Participants were encouraged to answer honestly and to the best of their ability. As this research undertook a semi-structured approach to the interview, participants had the opportunity to expound on responses on their own or through follow-up questions asked by the researcher. The researcher maintained a professional yet collegial style and utilized active listening techniques to ensure the participants felt comfortable and encouraged to respond openly. Upon the ending of the interview, the researcher thanked the

participant and asked if they can be contacted by the researcher in the event that clarification is needed.

**Interview questions.** Participants were asked to participate in a semi-structured interview conducted through videoconferencing technology. Each interview question was designed to align with one of the four proposed research questions. Participants in this research study were asked a sequence of 18 pre-structured interview questions, five were demographic questions related to the ALO, and 13 questions regarding institutional practice and process changes designed and implemented as a result of changing accreditation policy, anticipating the eliciting of the participant's perspective. While there are close to 50 different WSCUC policies identified, interview questions addressed changes to three specific policies: (1) Meaning, Quality, and Integrity of Degrees policy (2) Unit Redemption Rate and Absolute Graduation Rate reporting requirements, and (3) Substantive Change policy to include non-degree programs. Questions were designed to address the four research questions outlined in this study. The series of interview questions are provided in Appendix D.

**Validity of the study.** To ensure the validity of the instrument utilized in the study, a two-step validation process was employed to facilitate the process. "Validity implies that the finding are real and that there is little or no reason to doubt their truth" (Morse et al., 2001, p. 197). Validity strategies in qualitative research are those that researchers undergo in order to show accuracy of findings within a study (Creswell, 2014). These strategies of verification contribute to the validity of a study and are executed in the actual research process (Morse et al., 2001). An imperative tenet of a qualitative study is to build trustworthiness in the results by utilizing such validation strategies (Creswell, 2013). As such, this study employed three phases

of validity for the creation and review of the instrument used to collect data, as well as for the qualitative data analysis process.

***Prima-facie and content validity.*** Content validity implies that the design of the instrument considers all facets of a given construct. Prima-facie validity is a component of content validity and implies the care of the researcher in the creation of the instrument for use in the study. To meet these two validation processes, interview questions for this study were developed in alignment with the research questions and are based on the review of the literature and expert review.

Table 2.

*Research Questions and Corresponding Interview Questions*

<b>Demographic Research Questions</b>	
IQ1: How long have you been employed by your institution?	
IQ2: How long have you served as ALO of your institution?	
IQ3: How many other institutions within the WSCUC region have you served as ALO?	
IQ4: How many years total have you served as an ALO across institutions?	
<b>Research Questions</b>	<b>Corresponding Interview Questions</b>
RQ1: What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?	IQ 5: What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?
	IQ 8: What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?

(continued)

Research Questions	Corresponding Interview Questions
RQ1: What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?	IQ 11: What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs?
RQ 2: What challenges do higher education institutions encounter in implementing changes in accreditation policy?	<p>IQ 6: What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy?</p> <p>IQ 9: What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?</p> <p>IQ 12: What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change policy to include non-degree programs?</p>
RQ3: How do higher education institutions evaluate the success of operationalized changes in practices and policies?	<p>IQ 7: How did your institution evaluate the success of implemented changes needed as a result of the change to this policy?</p> <p>IQ 10: How did your institution evaluate the success of implemented changes needed as a result of the change to this policy?</p> <p>IQ 13: How did your institution evaluate the success of implemented changes needed as a result of the change to this policy?</p>

(continued)

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RQ4: What recommendations would higher education institutions make for future implementation of accreditation policy changes?

IQ 14: What recommendations would you make for higher education leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies?

IQ 15: Is there anything else you'd like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies?

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*Note.* The table identifies four research questions and corresponding interview questions. Interview questions were reviewed by two panels of expert reviewers.

***Expert review validity.*** To continue the process towards achievement of instrument validity, two panels of experts were engaged to review the instrument and provide feedback on clarity, structure, and content. The first panel of experts consisted of two higher education professionals with experience in qualitative research design and methodology. Both hold doctoral degrees, one in educational leadership and the other in adult learning education. This first expert panel provided insights on the clarity, content relevance, and structure of the instrument. The second expert panel consisted of two current ALOs who have at least two years of experience in the role of ALO in the WSCUC region. Both hold doctoral degrees, one in higher education and policy analysis and the other in higher education. This second expert panel provided insights on the clarity, content relevance, and structure of the instrument, as well as feedback on the selection of policies included in the study. Table 2 shows the revisions made to the instrument based on the expert reviews.

Table 3.

*Research Questions and Corresponding Interview Questions (Revised)*

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**Demographic Research Questions**

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IQ1: How long have you been employed by your institution?

IQ2: How long have you served as ALO of your institution?

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IQ3: What other roles do you currently have within your institution?

IQ4: How many other institutions within the WSCUC region have you served as ALO?

IQ5: How many years total have you served as an ALO across institutions?

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(continued)

<b>Research Questions</b>	<b>Corresponding Interview Questions</b>
RQ1: What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?	IQ 6: What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?  IQ 9: What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?  IQ 12: What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs?
RQ 2: What challenges do higher education institutions encounter in implementing changes in accreditation policy?	IQ 7: What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy?  IQ 10: What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?  IQ 13: What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change

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policy to include non-degree programs?

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(continued)

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RQ3: How do higher education institutions evaluate the success of operationalized changes in practices and policies?

IQ 8: How did you and others at your institution evaluate the success of implemented changes needed as a result of the change to this policy?

IQ 11: How did you and others at your institution evaluate the success of implemented changes needed as a result of the change to this policy?

IQ 14: How did you and others at your institution evaluate the success of implemented changes needed as a result of the change to this policy?

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RQ4: What recommendations would higher education institutions make for future implementation of accreditation policy changes?

IQ 15: What recommendations would you make for higher education institutional leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies?

IQ 16: Is there anything else you'd like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies?

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*Note.* The table identifies four research questions and corresponding interview questions with revisions based on feedback from expert reviewers.

After the expert reviews were conducted on the instrument, two additional questions were added to explore the institution's culture and possible change models utilized in efforts to enact change within institutions as a result of changes in accreditation policy. Those questions were inserted as:

- IQ 15: In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies?
- IQ16: What change models, if any, were used to operationalize changes within your institution as a result of changes to the three aforementioned policies?

Interview questions originally numbered as IQ15 and IQ16 were moved to IQ17 and IQ18 respectively. After these questions were added, the researcher engaged the first expert review panel to evaluate the added questions as part of the full instrument for external validity.

**Reliability of the study.** In the traditional confines of research approaches, reliability refers to the ability of research findings of a study to be replicated (Merriam, 2009). However, within the context of qualitative research, and especially in the exploration of human behaviors and experience, some experts question the application of reliability. Lincoln and Guba (1985) were the first to conceptualize reliability in a qualitative framework. Instead of demanding that a study be replicable, they stated that reliability in qualitative research should be noted through dependability and consistency – meaning that an outside researcher would draw the same conclusions or findings with the same data collected.

As such, in order to align with design for maximum reliability two approaches are considered – internal and external validity. Internal validity refers to the ability of the research findings match reality (Merriam, 2009). For this qualitative study, internal reliability relies on the collection and analysis of interview data. External reliability is the extent to which outside researchers could utilize the methods and approaches used by the researcher and come to the same or similar conclusions. To reach the highest levels of reliability in this study, the research questions, interview protocol, data analysis design, and use of validation processes were



developed according to guidelines presented in the literature. In addition, a number of strategies will be employed to promote reliability and validity of the study as cited by Merriam (2009): (1) sufficient engagement in the data collection process to move to saturation, (2) use of researcher reflexivity – in other words, the researcher’s process of self-reflection regarding her assumptions, biases, relationship to the study, and worldviews that could affect the scrutiny of data, (3) peer review and examination concerning the process of raw data and emerging findings, (4) use of an audit trail for detailed documentation, (5) providing *rich and thick* descriptions to contextualize the study, and (6) use of maximum variation in sample selection as described above.

### **Statement of Limitations and Personal Bias**

Within a qualitative framework, the researcher deploys the instrument used for data collection, thus a research study will not be without limitations and bias. However, it is important to enact certain methods to remove as much bias as possible. Merriam (2009) suggests that the researcher, having experienced the phenomenon, explore his/her own experiences prior to conducting the interviews to create awareness of personal prejudices and views, and to scrutinize the dimensions of the experience. As such, the researcher understood the potential for personal bias in the data collection process. The researcher has been employed by one institution of higher education for eight years and has worked in the accreditation area for almost six years. The researcher is very familiar with WSCUC policies and in the implementation of the policies within her own institution. While the researcher is not a designated ALO for her current institution, she works closely with the assigned ALO and assists with the implementation of accreditation policy and preparation for accreditation reviews. With the acknowledgement of potential personal bias and the intent to remove as much bias from the process as possible, the researcher utilized bracketing at various stages in the data collection process.

**Bracketing and epoche.** According to Moustakas (1994), bracketing is the first phase in phenomenological reduction, the process by which the researcher sets aside fixed experiences as much as humanly possible to clearly understand the experiences of the participants in the study. “Bracketing means that the information learned about prior work is simply put on hold and is not used as a framework or conceptual scheme for the proposed study or observations” (Morse et al., 2001, p. 192). In doing so, the researcher deferred the belief that matters are unaltered by the consciousness of them (Packer, 2011). Otherwise referred to as the concept of epoche, using a bracketing approach moves the research into transcendental phenomenology which is focused more on the descriptions of the participant and less on the interpretations of the researcher (Creswell, 2013). During the course of the research study, the researcher deployed tactics of bracketing to suspend judgement, consistently reflecting on personal experiences to understand areas of bias that may impact the data analysis process.

### **Data Analysis**

Qualitative researchers are interested in grasping how people interpret their experiences, how they build their worlds, and what meaning they ascribe to their experiences (Merriam, 2009). Richards (2015) describes five standards of qualitative research data – that they are accurate, beneficial, reflexive, provide context, and are presented within the characteristics of *thick description*. The analysis process for this phenomenological study is based on the assumption that there is an essence that is collectively experienced across participants, and these experiences are analyzed as unique occurrences to ultimately identify the resulting essence (Marshall & Rossman, 2016). The analytical strategy in this process will be the transactions between the material collected and the theoretical framework. “This interchange process begins not only when the data are available in a transcribed form, but at the beginning of the data

collection – as a kind of interplay between, on the one hand, theoretical considerations, and other the hand experience and observation during exploration of the research field” (Flick et al., 2004, p. 253). Creswell (2014) offers six practical steps for approaching data analysis in qualitative research: (1) organize and prepare the data for analysis, (2) review all the data to reflect on its overarching meaning, (3) code the data, (4) use the coding process to generate a description of the people and themes for analysis, (5) determine how the description and themes will be signified in the qualitative narrative, and (6) interpret the findings or results.

**Reading and making memos.** During the data analysis process, the researcher read and reviewed the data collected through transcripts along with field notes taken during the time of the interview. Field notes described observations or notations made at the time of the interview to that are important to the sense-making process used in the analysis phase. In the review of notated transcripts, the researcher created memos that assisted in theme generation to support the formulation of emerging new concepts based on consensus.

**Describing, classifying, and interpreting (coding).** The goal of qualitative coding is to learn from the data by revisiting data pieces until patterns and explanations arise (Richards, 2015). The process of coding comprises the aggregation of words into small categories of information, in pursuit of evidence for the code from various databases used in the study, and then using a labeling technique to assign a descriptor (Creswell, 2013). Saldana (2016) posits that “a code in qualitative inquiry is most often a word or short phrase that symbolically assigns a summative, salient, essence-capturing, and/or evocative attribute for a portion of language-based or visual data” (Saldana, 2016, p. 4). Tesch (1990) offers eight steps in the coding process: (1) get an overall sense of the data by reading all transcriptions carefully, (2) select one interview transcription to review and write comments in the margin while reading it addressing the context;

repeat this for several participants (3) make a list of all topics and group them together by likeness, (4) revisit the data to reduce topics to codes, writing the codes next to the aligned sections of the document and identify if new codes emerge, (5) find the most descriptive working for your topics and turn them into categories, (6) make a final choice on the abbreviation for each category and alphabetize them, (7) assemble the data material belonging to each category in one place and perform a preliminary analysis, and (8) if needed, recode the existing data. In addition to using this process for data coding, the researcher leveraged the computer software, Nvivo, to store data and subsequent codes, categories, and themes.

**Interrater reliability and validity.** External validity is one approach to establishing validity and interrater reliability within a research study. Creswell (2014) suggests that using peer debriefing is one means for establishing qualitative validity, or ensuring accuracy of findings. Peer debriefing engages a person or persons outside of the research process to question the researcher's methods and meaning-making processes, providing an opportunity for recommendations and validation of the processes used. To this end, a three-step process was used to establish interrater reliability:

- Step one – initial coding took place with the researcher reading, reviewing, and coding the first three interview transcripts. The researcher organized the data in a manner to generate themes, allowing them to emerge from the data analysis.
- Step two – a peer review committee of two members with experience in qualitative research methods, including coding, was engaged to scrutinize the coding procedures used and accuracy of the themes that emerged from the data analysis. Consensus of the two reviewers was achieved in order to confirm the validity of the results. In the event

that consensus amongst the peer reviewers did not occur, the dissertation committee would have been engaged to determine appropriate process.

- Step three – the remaining interview transcripts were coded and analyzed using the method and process as determined during peer review. The results stemming from the coding process to generate themes was shared with the peer review committee. Once again, consensus of the two reviewers was achieved in order to confirm the validity of the results. Final consensus would have been provided by the dissertation committee if necessary.

### **Chapter 3 Summary**

This chapter explored the literature guiding the principles of solid qualitative research design while also describing the phenomenological research methodology approach. An analysis of the research design was provided including the steps that were taken for participant selection and sampling technique with a description of the sampling frame that used to create a master list as well as the criteria for inclusion and exclusion. Content in this chapter also provided an outline of human subject protection in research and how this study abided by the federally-established and university-enforced procedures to ensure the safety of participants. A description of how data collection occurred and the interview protocol depicted through interview techniques aligned with the literature, interview questions, and the validity and reliability of the study. Finally, the limitations of the study and potential for personal bias were addressed, and the data analysis method was presented, including how the researcher obtained inter-rater reliability across transcription analysis.

## Chapter 4: Research Findings

Changing policies enacted by the United States Department of Education cause regional accreditors, the main higher education institution oversight body, to adjust their policies to align. When regional accreditors alter policies, institutions of higher education must react within differing timeframes and through various reporting processes. As the landscape of higher education continues to evolve leaders within higher education institutions are tasked with adjusting internal practices to meet shifting requirements. As such, the purpose of this research study was to investigate the strategies, challenges, and success measures leaders at institutions of higher education use to operationalize changes needed as a result of changing regional accreditation policy. It further explored recommendations institutional leaders have for future implementation of accreditation policy changes. To accomplish this purpose, this study sought to answer the following four research questions:

***RQ1*** - What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?

***RQ2*** - What challenges do higher education institutions encounter in implementing changes in accreditation policy?

***RQ3*** - How do higher education institutions evaluate the success of operationalized changes in practices and policies?

***RQ4*** - What recommendations would higher education institutions make for future implementation of accreditation policy changes?

An interview instrument of eighteen open-ended questions was created to provide relevant demographic information of the participant and to answer the four research questions. Each interview question aligned to one of the four research questions, with one question aligning

to two research questions. The interview protocol was validated through an interrater reliability and validity technique consisting of prima facie validity and expert review by two qualitative researchers for validity and reliability. The following eighteen interview questions were solidified and used as part of the interview protocol of this research study:

#### Demographic Questions

1. How long have you been employed by your institution?
2. How long have you served as ALO of your institution?
3. What other roles do you currently have within your institution?
4. How many other institutions within the WSCUC region have you served as ALO?
5. How many years total have you served as an ALO across institutions?

#### Questions Aligned to Research Questions

6. What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ1)
7. What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ2)
8. How did you and others at your institution evaluate the success of implemented changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ3)
9. What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ1)
10. What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ2)

11. How did you and others at your institution evaluate the success of implemented changes needed as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ3)
12. What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs? (RQ1)
13. What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change policy to include non-degree programs? (RQ2)
14. How did you and others at your institution evaluate the success of implemented changes needed as a result of the update to the Substantive Change policy to include non-degree programs? (RQ3)
15. In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies? (RQ1 & RQ2)
16. What change models, if any, were used to operationalize changes within your institution as a result of changes to the three aforementioned policies? (RQ1)
17. What recommendations would you make for higher education institution leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies? (RQ4)
18. Is there anything else you'd like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies? (RQ4)



Interview participants provided a response to each of the eighteen questions in the semi-structured interview resulting in a robust set of data that identified strategies, challenges, and evaluation methods used to determine success of implemented changes as a result of changing accreditation policy. Moreover, data identified recommendations for future implementation of accreditation policy. From this in-depth data collection and analysis process a set of themes emerged. Chapter four discusses the data collection process used, provides a demographic analysis of the participants interviewed and the institutions they represent, a presentation of the data analysis process, and a description of the interrater reliability process. Furthermore, this chapter details the findings that resulted from the analysis of data as it aligns to the research questions.

## **Data Collection**

The population studied was designated Accreditation Liaison Officers (ALOs) employed at higher education institutions that are regionally accredited and in good standing in the WSCUC region. Participant selection was approached using a purposive sampling technique. The data collection process began with the collection of contact information for all ALOs in the WSCUC region as well as accreditation status and the result of the most recent reaffirmation for each institution, which is publicly accessible on the WSCUC website. In order to create a master list to establish a sampling frame for this the WSCUC institution directory (<https://www.wscuc.org/institutions>) along with the list of upcoming reviews (<https://www.wscuc.org/institutions/reviews>) were exported and merged. Additional columns were added to identify international status, most recent reaffirmation date, and the number of years achieved during the most recent reaffirmation. This generated a list of 210 institutions. The list was then filtered to ensure participants met the criteria for inclusion. The resulting initial list

contained 13 participants and maximum variation was applied to ensure a variation of institutions was included in the sample. Once Pepperdine University IRB approval was obtained in late January 2019, data collection ensued. Data was collected from the end of January 2019 to mid-March 2019 utilizing the IRB-approved recruitment script.

On January 31, 2019 the first batch of recruitment letters were sent to the thirteen potential participants via email. These thirteen participants' institutions received reaffirmation of accreditation at the February 2018 and June 2018 commission meetings – the two most recent meetings as the commission meetings occur twice per year. The thirteen recruitment letters yielded a total of five interviews and eight non-responses. To seek additional interviews, the list of potential participants was expanded to allow for recruitment of participants whose institutions were reaffirmed during the June 2017 WSCUC commission meeting. This included four additional institutions who met the criteria for review. This second batch of recruitment letters sent during the month of February yielded two interviews and two responses of interest. One of these interview participants was new to her current institution and was unable to respond to the interview questions for that institution. However, her previous institution, where she was ALO, met the criteria for inclusion and she was able to answer the questions from her experience enacting change as a result of changes to regional accreditation policy changes at that institution. Lastly, during the timeframe of data collection an additional WSCUC commission meeting took place in February 2019. The results of that meeting were published and included a total of two additional institutions who met the criteria for inclusion. Therefore, a third batch of recruitment letters were distributed to two potential participants and yielded one interview and one non-response. In early March it was noted that one potential participant in the first batch of thirteen was no longer listed as ALO on the WSCUC website, bring the first batch of potential

participants down to twelve. By mid-March a total of eight interviews were completed, representing a total of 44% of the population sought and meeting the minimum stated in Chapter 3.

Upon agreeing to participate in the study the approved informed consent form was provided and the interview instrument was supplied upon request. All interviews took place using Zoom videoconferencing technology. Each participant was notified at the beginning of the interview that their identity and the identity of their institution would be kept confidential through the use of pseudonyms in the reporting of findings. Participants were also informed that their participation in the study was voluntary and they could end the interview at any time. Participants were offered a copy of the dissertation once it is published. All eight participants consented to have the interview recorded.

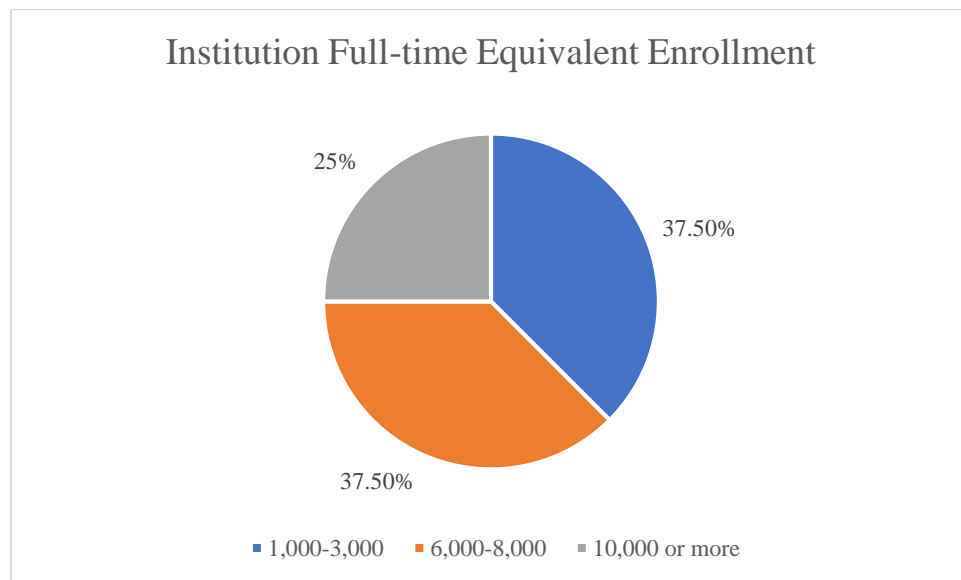
Table 4

*Participant Interview Dates and Interview Method*

<b>Participant</b>	<b>Interview Date</b>	<b>Interview Method</b>
P1	February 6, 2019	Zoom
P2	February 8, 2019	Zoom
P3	February 14, 2019	Zoom
P4	February 15, 2019	Zoom
P5	February 21, 2019	Zoom
P6	March 4, 2019	Zoom
P7	March 8, 2019	Zoom
P8	March 15, 2019	Zoom

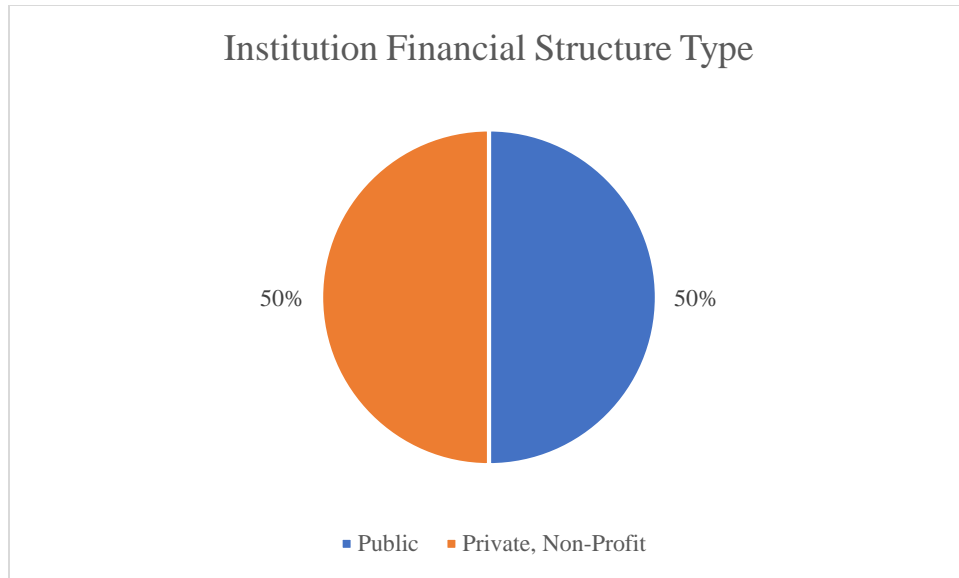
## Participants

The participants in this study were ALOs at institutions of higher education in good standing with WSCUC, the institution's regional accrediting body. Representing a diverse population of institutions, the interviewees numbered eight. Institutions represented ranged in size, the largest institution represented reports a student body full-time equivalent enrollment count of over 12,000 and the smallest institution has a student population of just under 1,000 (see Figure 1).



*Figure 1.* ALO institution full-time equivalent student enrollment.

Participants were employed at institutions both old and relatively new. Five, or 62.5 % of the participants were employed at institutions that were first accredited by WSCUC prior to the year 1960. Three, or 37.5 % of participants were employed at institutions that were first accredited after 2003. Participants also represented multiple types of institutional financial structures. Fifty-percent, or four, were employed at public institutions and 50 %, or four, were employed at private, non-profit institutions (see Figure 2).



*Figure 2.* ALO institution type by financial structure.

**Demographic questions.** The approved interview protocol included five initial questions to collect demographic data on the interview participant. This data was collected to supplement the interview questions aligned to the research question to determine if these characteristics impacted participant responses to the remaining thirteen questions. Discussions of that impact are presented in the data display section below.

Interview question one asked, “How long have you been employed by your institution?” and resulted in responses ranging from two and a half years to 25 years. Two participants, or 25%, had been employed at their institution for five years or less. Twenty-five percent, or two, had been employed at their institution for 6-10 years. Two, or 25%, had been employed at their institution for 11-15 years, and one, or 12.5%, had been employed at their institution for 16-20 years. Lastly, one, or 12.5% of participants had been employed at their institution for 21-25 years.

Interview question two asked, “How long have you served as ALO of your institution?” and resulted in responses ranging from less than a year to 10 years. Of the eight participants,

four, or 50%, had served as ALO of their institution for two years or less. It is important to note that while these participants had served as ALO for two years or less, each was involved in processes to enact change within their institution as a result of changes in WSCUC policy. Each of these four participants were able to respond authentically to the remaining questions. Three, or 37.5% of participants had served as ALO at their institution for six to eight years. One, or 12.5%, had served as ALO of the institution for nine to 11 years.

Interview question three asked, “What other roles do you currently have within your institution?” All eight participants held roles in the area of academic affairs/academic operations. Of the eight, five, more specifically, stated they had some level of responsibility and oversight for assessment activities. Three of the five also held a position where they had oversight of curriculum across the institution. One participant’s role also included oversight of student affairs operations.

Interview question four asked, “How many other institutions within the WSCUC region have you served as ALO?” and resulted in a unique finding. Of the eight participants, seven, or 87.5%, had not served as ALO at any other institution. Only one, or 12.5%, had served as ALO at one other institution. This rendered interview question five obsolete for seven of the eight participants.

Interview question five asked, “How many years total have you served as an ALO across institutions?” and rendered almost identical data to interview question two. However, one participant had served as ALO at a second institution. Therefore, in response to this question, three, or 37.5% of participants had served two years or less total as an ALO. One, or 12.5%, served a total of three to five years as ALO. Another three, or 37.5%, served a total of six to eight years as ALO, and one, or 12.5%, had served a total of 9-11 years as ALO.

## **Data Analysis**

To analyze the collected data this study utilized Tesch's (1990) phenomenological eight-step approach to guide the coding process: (1) get an overall sense of the data by reading all transcriptions carefully, (2) select one interview transcription to review and write comments in the margin while reading it addressing the context; repeat this for several participants (3) make a list of all topics and group them together by likeness, (4) revisit the data to reduce topics to codes, writing the codes next to the aligned sections of the document and identify if new codes emerge, (5) find the most descriptive working for your topics and turn them into categories, (6) make a final choice on the abbreviation for each category and alphabetize them, (7) assemble the data material belonging to each category in one place and perform a preliminary analysis, and (8) if needed, recode the existing data. In addition to using this process for data coding, the computer software Nvivo was leveraged to complete the eight steps and store data and subsequent codes, categories, and themes.

Data for this study was collected through the audio or video recording of each interview. Field notes included observations or notations made at the time of the interview that were helpful to the sense-making process used in the analysis phase. After each interview, the researcher downloaded the audio transcription produced by the Zoom videoconferencing software, and listened to the audio recording to ensure the accuracy of the transcription, making edits as appropriate. Names of participants along with references to the name of their institution and all other identifiers were removed from the transcripts, and each participant was assigned a pseudonym. The audio or video recordings were listened to a second time to follow an epoche process in order to confirm that no personal biases influenced the data. During the data analysis process, the researcher read and reviewed the data collected through transcripts along with field

notes taken during the time of the interview. In the review of notated transcripts, the researcher created memos that assisted in theme generation to support the formulation of emerging new concepts based on consensus. The researcher followed a line-by-line analysis of each transcription to identify themes and make meaning of the data collected. The participant responses for each question was reviewed, analyzed, and coded as it aligned to the research questions. The researcher grouped coded data into themes and sub-themes under each research question. To validate the data analysis process, an interrater reliability and validity process was used.

### **Inter-rater Review Process**

To validate the data analysis process, a three-step interrater review process was completed. The first step was the initial coding completed by researcher through reading, reviewing, and coding the first three interview transcripts. The researcher organized the data in a manner to generate themes, allowing them to emerge from the data analysis. In the second step, the researcher engaged a committee of two members with experience in qualitative research methods, including coding, to scrutinize the coding procedures used and accuracy of the themes that emerged from the initial data analysis. The process was conducted by two university faculty members who hold doctoral degrees. Both have extensive experience in qualitative data collection and analysis, and both are published researchers. Each were given a copy of the codebook produced from Nvivo, where the initial coding had been completed, along with a sample of significant corresponding participant responses. The reviewers were also provided the research questions and interview questions for this study to offer additional context. The reviewers were asked to prepare feedback on the key phrases and responses as they aligned to each thematic designation. Reviewers were also asked to provided feedback on the naming of the



themes. Consensus of the two reviewers was achieved to confirm the validity of the results. Stemming from this validation process was the agreement of the committee for a total of two edits (see Table 5). While no identifiers were shared with the committee members, they each signed a confidentiality agreement.

Table 5

*Inter-rater Coding Table Edit Recommendations*

<b>Research Question</b>	<b>Theme Number</b>	<b>Initial Theme Name</b>	<b>Updated Theme Name</b>
1	5	Strategic Education of Stakeholders	Strategic Communication to Educate Stakeholders
4	4	Strategic Education of Stakeholders	Strategic Communication to Educate Stakeholders

The remaining interview transcripts were coded and analyzed using the method and process as determined during expert review. The results from the coding process to generate themes were shared with the review committee. Once again, consensus of the two reviewers was achieved in order to confirm the validity of the results and appropriate naming of themes.

### **Data Display**

The following sections display the analyzed data and findings by research question leveraging the responses to aligned interview questions. Themes emerged from the data are described and participant responses to support the themes are included. Bar graphs are featured to show a visual representation of the major themes discovered for each research question and the frequency in which participants offered a response in correlation to a specific theme. The 18 themes from the 15 non-demographic interview questions are displayed by research question. Furthermore, additional sub-themes are provided for supplementary depth and analysis. Participants are referenced to and labeled according to their corresponding interview order to

protect their anonymity and the anonymity of their institution (e.g. Participant 1 [P1], Participant 2 [P2], etc.).

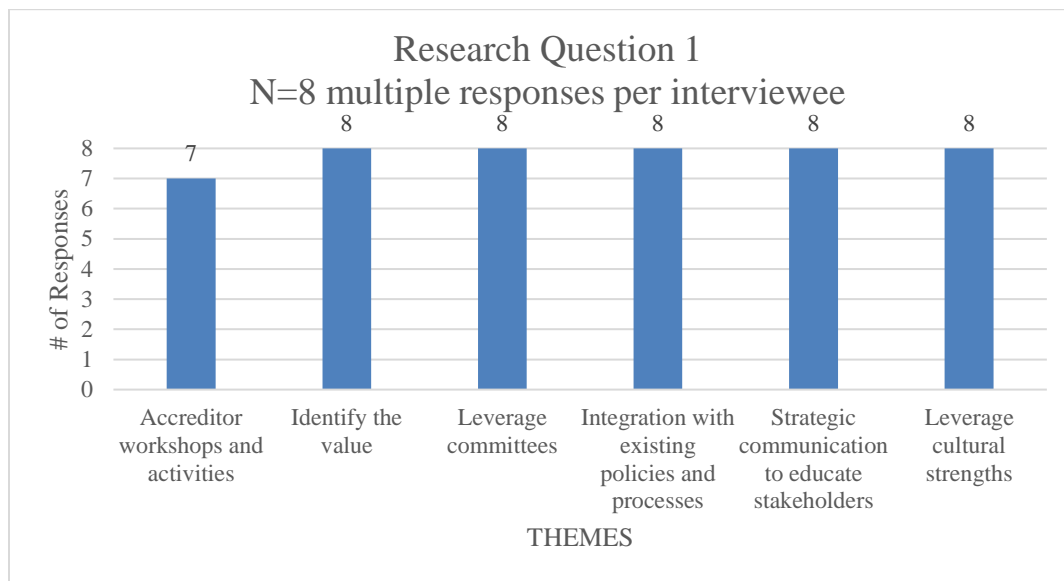
### **Research Question 1**

Research question one asked, “What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?” Five interview questions aligned to research question one were leveraged to seek responses from participants.

- **IQ 6:** What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?
- **IQ 9:** What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- **IQ 12:** What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs?
- **IQ 15:** In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies?
- **IQ16:** What change models, if any, were used to operationalize changes within your institution as a result of changes to the three aforementioned policies?

The responses from all participants for the five interview questions were analyzed to identify common themes as they relate to the first research question. Stemming from this analysis, six themes emerged: a) accreditor workshops and activities, b) identify the value, c)

leverage committees, d) integration with existing policies and processes, e) strategic communication to educate stakeholders, and f) leverage cultural strengths (see Figure 3).



*Figure 3. RQ1: Themes developed from strategies used to implement changes as a result of accreditation policy changes.*

**Accreditor workshops and activities.** The first strategy and practice for implementation of changes as a result of accreditation policy changes is engaging in accreditor workshops and activities. Seven out of eight participants (87.5%) indicated that attending accreditor workshops and activities, along with encouraging others across campus to attend was not only helpful in understanding the implications of new or changing accreditation policies, but also in anticipating changes to policy that might occur in the future. Three subthemes were developed from participant responses and further explore elements of this strategic practice.

**WSCUC workshops (P1, P2, P3, P6, P7, P8).** Six of the eight participants (75%) referenced their attendance and the attendance of others, including institutional leaders, faculty members, and staff, at WSCUC workshops. The regional accreditor offers hands-on workshops throughout the year, some specifically designed to address new or changing policies. Participants indicated that spending resources to attend these events, both workshops held in various

locations in California and Hawaii as well as at the annual Academic Resource Conference, enabled them to better understand accreditor expectations around policies as well as engage with leaders at other institutions to learn about different approaches to implement and further operationalize new or changing policies. Participant 1 expressed the impact of this strategy.

“Taking the time to, particularly on some of the more complicated ones again like MQID, taking the time to really understand what the policy is and what it's requiring that's something we had to spend a lot of time on, and attending workshops, talking with individuals, talking with individuals at other campuses, who are struggling, you know, wrestling with the same thing. How are you interpreting this? How are you going about it? That can also be very helpful - is having a network of, you know, ALOs and individuals at other campuses to talk through because they are so very steeped in this information and can provide alternative perspectives that maybe the local campus doesn't have because at least here, you know, we have a couple of people locally that are accreditation experts, but the majority of the people in our campus don't even know that WASC policies have changed let alone what those changes are” (P1).

***Serve as WSCUC reviewer (P2, P5).*** Two of eight participants (25%) revealed that they themselves along with others on their campus serve as peer reviewers for the accreditor. In utilizing this strategy, it not only connects the ALOs and others closer to the activities of the accreditor, meaning that it gives people a better understanding of the accreditor's policies and expectations, but also that it provides an opportunity to identify how other institutions are choosing to operationalize accreditation policies internally. The following quote from Participant 2 offers a significant elaboration on how this strategy is useful for institutional leaders.

“Since I started I got three people, at least, to do WASC visits - three other people - so more people were active in WASC so there's much more of a top of mind presence of WASC for people within [institution]...and I also have to say, I found it very helpful to get more people at the organization doing visits and serving on committees for a while because then they see what it's like on the other side - to be an evaluator and to go into a place that hasn't paid attention to you. You know, how retched that could be” (P2).

***Anticipate changes (P3, P5, P6).*** Three of the eight participants (37.5%) signified the importance of engaging in accreditor workshops and events in order to anticipate changes to policies or expectations. This strategy allowed for ALOs to communicate back to their institutional leaders in advance of the enacted change, but also helped them to begin to develop plans for communication and implementation in a more thoughtful way as there was less time-pressure. In addition, some policies or reporting requirements added or changed by the accreditor offered voluntary pilots that institutions could engage in to “test” the policy and gather feedback from institutions, further mobilizing an institution’s ability to anticipate and operationalize changes. Participant 3 describes this strategy in more depth.

“And so my strategy in general around WASC things is to try to know they're coming and be out in front. So, for example, with that [URR and AGR reporting requirements] we actually participated in the pilot. So we were one of the pilot schools, right, so we already had sort of in place we'd already made sure we developed the algorithms that allowed us to calculate those things right in terms of our strategy for actually using those data, the problem with our campus right and that those metrics” (P3).

**Identify the value.** The second major strategy for implementing changes within an institution as a result of changes in accreditation policy is for institutions to identify the value in

the policy - how the policy can benefit the organization. All eight participants (100%) expressed the importance that institutions do not view new or changing policies as compliance-based requirements being forced upon them by an external body. Instead, participants engaged in deep thought and conversations with other institutional leaders and groups to evaluate the policy and determine how it can be leveraged to make positive change academically or operationally. All participants indicated that this strategy was possible because the policies tended to be rational and therefore, leaders could find meaning for their unique institution. Participant 3 described this approach thoughtfully and succinctly:

“And my strategy has always been here to make what WASC wants work for us, not do it for WASC, but do it for ourselves and figure out how we make it work locally” (P3).

To further explore this major strategy, two sub-themes were identified and analyzed.

*Use as impetus for improvement (P1, P3, P4, P5, P6, P7, P8).* The first of two sub-themes under the “identify the value” strategy is for institutions to use the new or changed policy as an impetus for institutional improvement. One-hundred percent of participants (8) stated that using the policy to inform improvements was an imperative means for identifying the value of that policy. In some instances, policies offered a vehicle to impose action or conversation that participants’ institutional leaders knew needed to happen, yet had not been a priority. The new or changed accreditation policy forced institutions into change, mostly in ways that were foundational to academic or operational enhancements. These changes were welcomed as institutions used the policy to advance action. Participant 5 provided the following response about one new policy in particular:

“So I think the process wasn't - the process itself wasn't a challenge, but it allowed us to uncover something that we really needed to think about. And so we had to structure

mechanisms on campus to do that, which were different than the general one because the meaning quality of degree was so focused on undergraduate and it makes sense with the demographics of the institution and very few graduate programs, but it needed to happen” (P5).

***Institutional Reflection (P1, P2, P3, P5, P7).*** The second sub-theme stemming from the “identify the value” major strategy is the use of the enacted accreditation policy change to provide a vehicle for institutional reflection. Five of eight participants (62.5%) expressed how the new or changing policy offered the opportunity for groups to come together to reflect on how well the institution was doing in regards to areas including service to students, educational effectiveness, student achievement, and sufficiency of academic offerings. Participant 8 discussed how one accreditation policy helped guide their reflection as an institution and how it was useful as a strategic approach:

“And it was that was an interesting piece of the MQID analysis is we need to know if our degrees have quality and integrity, whether they have meaning, whether we differentiate ourselves from all of the other institutions in the [region], much less California, United States. Who are we? do we know who we are? Are we, true to that in every aspect of our educational endeavors? I mean, that's something we need to know and the fact that WASC makes us tell that story every eight or 10 years is not a bad thing. We would never, you know, no institution has time to do this kind of work unless we're required to do it. And we learned a lot” (P8).

***Leverage committees.*** The third major strategy and practice in implementing changes needed as a result of changing accreditation policy is to leverage committees. All eight participants (100%) stated the use of committees was a strategy utilized to successfully

implement new processes or changes to internal practices, processes, and policies. Committee membership was cited as an important consideration – to have the right people involved who can influence and operationalize changes depending on the departments that are most impacted. In addition, when the changed policy impacts the institution as a whole, membership may include the upper levels of institutional leadership. Two types of committees were strategically utilized across participants' institutions.

*Accreditation committee(s) (P1, P2, P4, P5, P6, P8).* The first sub-theme under the “leverage committees” strategy is to create committees specifically for accreditation efforts. Six of eight participants (75%) stated the importance of establishing an accreditation committee comprised of key people across the institution to prepare and plan for implementing strategies need in response to new or changing accreditation policy. More specifically, accreditation committees were leveraged when the execution of the policy is evaluated as part of the reaffirmation of accreditation process where institutions prepare self-studies and respond to policies or components including the Meaning, Quality, and Integrity of the Degree (MQID) policy. Participant 4 detailed the composition of the accreditation committee used to discuss and prepare for this effort.

“We have a steering and self-study committee and ultimately we recommended that that group stay intact and while people will come and go on that committee there is a historical perspective that will make her so you stagger the terms that people serving that includes people from across the institution, the faculty are a part of that, student affairs people are part of that, administrative affairs, advancement and you know their staff and students to serve on the steering and self-study committee. The college deans, especially because the greatest need for improvement is in academic affairs really and assessment of



learning, and the Office of Institutional Effectiveness. Those are the major stakeholders that are involved in these discussions and obviously the President the Provost” (P4).

***Existing committees (P2, P3, P6, P7).*** The second sub-theme within the “leverage committees” strategy is to make use of existing committees to implement changes needed as a result of changing accreditation policy. Four of eight participants (50%) described how collaborative and decision-making bodies on campus were presented the updated policy and asked to take part in the efforts needed to operationalize the amendments needed to remain in compliance. Participant 2 shared how an existing committee was leveraged to prepare the self-study for reaffirmation of accreditation which included a response to the MQID policy.

“At [institution] we have an educational effectiveness committee and I until very recently I chaired that committee and so on that committee are representatives - the deans of all schools and other academics and student affairs. It's a cross team kind of collaborative committee which even includes the CFO, for example. It's got about a dozen people and we had conversations early on as we were preparing to launch our self-study for reaccreditation, about what the big picture things were that we were going to want to address in our report, and that was one of them” (P2).

***Integration with existing policies and processes (P1, P2, P3, P6, P7, P8).*** The fourth strategy for implementing changes needed as a result of changes in accreditation policy is to integrate the policy into existing internal policies, processes, and practices. Six of eight participants (75%) expressed this approach within their own institution. In leveraging existing processes and policies, institutional leaders are able to increase efficiencies in implementation while also demonstrating alignment of current practice to accreditation policy. This rang true no matter the policy change, whether leveraging curriculum review and approval processes, annual

data review processes, or using existing structures that assess institutional learning outcomes to show meaning and quality of degrees. Participant 7 depicted how the institution leveraged an existing process to require programs to reflect on the MQID policy in an ongoing manner.

“And so one of the things that, but one of the things that we did was the - over time, had these conversations at the program level. And so I used the [program review] self-study framework to bring that in. And in fact we revamped the self-study framework to include many of these standards and criteria for review. And especially the meaning quality and integrity of the degree to... the program review process is a great place for faculty to consider their program and to be able to think about that - that you know what is the meaning of their program to consider the quality of their program and integrity” (P7).

**Strategic communication to educate stakeholders (P1, P2, P3, P4, P5, P6, P7, P8).**

The fifth strategy for implementing changes needed as a result of changes in accreditation policy is using strategic communication to educate stakeholders. All eight participants (100%) expressed strategic communication as one of the first considerations when new or changing accreditation policies are enacted. This includes strategic notification of impacted groups, meeting with established faculty bodies, and ensuring that the institutional leadership understand the changes to the policy, impact on all stakeholders, and actions needed to address the change. Participant 6 expressed one of the strategies employed at the institution as part of a strategic communication agenda to address the MQID policy.

“I can tell you that in response to writing that particular piece of our institutional report we did a lot of work. We hosted town hall meetings we brought people together. The meetings for the invitations for the town hall meetings that we did and they were probably three or four in the run up to finishing our institutional report, were absolutely

open to every member of the community - faculty non faculty alike staff who've been here for a very long time” (P6).

Participant 5 described the communication across departments that was required in order to ensure the changes to the substantive change policy to include non-degree programs were operationalized internally.

“So we had to call together the continuing education area, as well as the department chairs, just to make sure that we were capturing all of these different things. And then we also had to work with, you know, this school of education, which had many of these as well” (P5).

**Leverage cultural strengths.** Lastly, the sixth strategy used to implement changes needed as a result of changing accreditation policy is to leverage the cultural strengths of the institution. Seven of eight participants (87.5%) described positive cultural aspects of their institution that aided in engaging groups of people at the institution to discuss and determine the internal changes that needed to occur as a result of the new or changing accreditation policy. Two sub-themes in particular emerged from the analysis.

***Mission-centered culture (P4, P5, P6, P8).*** Four of eight participants (50%) described an institutional culture that is mission-centric. This mission-centered culture was helpful to institutional leaders when developing efforts to implement changes within the organization toward accreditation efforts. Participants connected activities to the mission and described how the missional focus served as a positive force on campus. Participant 6 detailed how this type of culture assists in the engagement of faculty on initiatives and committees.

“Yes, we do tend to attract faculty who are joiners they often work at the [system] and especially at [institution], because they're motivated by the social justice mission. And so,

asking them to do committee work, do service work, it's not pulling teeth. They enjoy students, they enjoy being on the campus and participating in the life here" (P6).

***New or growing institution used to accreditation activities (P2, P3, P5).*** Three of eight participants (37.5%) expressed that as a new and growing institution, people institution-wide were used to interacting with the regional accreditor and subsequently aligning internal practices to accreditor requirements. Participants who described this type of culture at their institution stated that it aided in implementing changes as a result of changes or new accreditation policy. The culture was such that submitting documentation and reports and keeping accreditor requirements at the forefront of the minds of faculty groups and leaders allowed for increased adaptability. Participant 2 provided insight to this culture stating, "it's a little bit like WASC is a part of the fabric of what we do" (P2).

**Change models.** Interview question 16 asked participants if they used specific change models when planning or implementing changes needed within their organization as a result of changes in accreditation policy. Zero out of eight participants stated that they used change models. However, while the participants declared a lack of intentional use of change models, it was noted that pieces of established change models were used by each participant as part of the strategies described. A discussion of this is included in Chapter 5.

**Research question one summary.** Research question asked, "What strategies do higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy?" Five subsequent interview questions asked were:

- IQ 6: What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?

- IQ 9: What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- IQ 12: What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs?
- IQ 15: In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies?
- IQ16: What change models, if any, were used to operationalize changes within your institution as a result of changes to the three aforementioned policies?

The interview questions asked in alignment with the first research question revealed strategies exercised by participants and participant institutions in implementing internal changes needed as a result of changes in accreditation policy. The six major themes that emerged were Accreditor Workshops and Activities, Identify the Value, Leverage committees, Integration with Existing Policies and Processes, Strategic Communication to Educate Stakeholders, and Leverage Cultural Strengths. Each finding for research question one resulted in a 100% response rate for all but one theme, Accreditor Workshops and Activities.

## **Research Question 2**

Research question two asked, “What challenges do higher education institutions encounter in implementing changes in accreditation policy?” Four interview questions aligned to research question one were leveraged to seek responses from participants.

- **IQ 7:** What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy?
- **IQ 10:** What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- **IQ 13:** What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change policy to include non-degree programs?
- **IQ 15:** In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies?

The responses from all participants for the four interview questions were analyzed to identify common themes as they relate to the second research question. Five themes were developed from the analysis: a) determining accreditor expectations, b) make it meaningful to us, c) stakeholder education and engagement, d) organizational culture challenges, and e) infrastructure (see Figure 4).



*Figure 4.* RQ2: Themes emerging from challenges encountered in implementing changes as a result of accreditation policy changes.

**Determining accreditor expectations (P1, P2, P3, P7).** The first challenge uncovered in the analysis is determining accreditor expectations of the changed or new policy. This includes challenges in interpretation the policy as well as understanding what the accreditor is looking to see enacted at the institution. Four of eight (50%) of participants expressed this as a challenge within their institution. Participant 1, in speaking of the MQID policy, shared this challenge of determining accreditor expectations.

“Yeah, that was a challenging one. We spent a lot of time, even just trying to figure out what the definitions were. I think that was our big challenge was trying to even figure out what it meant and what WASC was looking for” (P1).

**Making it meaningful to us (P1, P2, P3, P4, P5, P8).** The second challenge identified by participants is making the policy meaningful to the institution. Six of eight participants (75%) stated that it was challenging to review a new or changing policy and make the policy

meaningful or positively impactful for the institution. This challenge is in conflict with the major strategy of “identify the value” referenced in the analysis of research question 1 above.

Participant 5 discussed this challenge as it related to the enacted URR and AGR reporting requirements.

“The challenge was, we weren't really sure what it was going to mean and how it would be used, you know, in in what context, it would be used so that one was a little bit concerning so that I think the challenge was to just kind of be open about you know what the numbers were saying, and why the numbers were saying that but that's like an extra layer of communication and then making sure that everybody was informed that understood” (P5).

In reference to the MQID policy, Participant 1 identified the challenge of making the new policy meaningful for the institution.

“What does that mean for us, and how do we know that, and how do we know that that's happening for every student, not just for the ideal situation? But some of the conversations were also challenging because then it felt like people felt like they were being questioned. Questioning our quality or questioning our integrity. What? So you know so working through a process of just talking about what it meant. And trying to figure out what it meant. And then also talking about how are we going to address it in a way that's authentic and that didn't feel like we were just adding more bureaucratic paperwork” (P1).

**Stakeholder education and engagement (P1, P2, P3, P7, P8).** The third challenge in operationalizing changes when accreditation policy changes is stakeholder education and engagement. Five of eight (62.5%) participants indicated that educating impacted stakeholders



and ensuring that engagement in essential implemented processes as a result of changing policy is often a challenge. Participant 2 described this challenge to educate and engage stakeholders in internally instituted processes to meet the change in accreditation policy.

“So I think the biggest problem is just getting the message communicated across all of the faculty members and Deans and Associate Deans that these programs for no longer just, you could start them and stop them [non-degree programs] at any time without notice. So that was the biggest thing is making sure that nobody was out there starting a certificate program without going through the process. Keeping that inventory up to date and you know keeping WSCUC informed” (P2).

Participant 3 also noted this challenge in education and engagement of stakeholders.

“I think the hardest part was sort of, we're still in the process of mobilizing it, and so I think one of the challenges is, when you have sort of a high level vision for the campus or something like that, is helping people come to recognize it and to use it in all of our processes. And so how do you get it into the new program proposal process, getting it into the new program proposal process, getting it systematically integrated into program review so you can put these things in policy? How do you really build engagement around that? I would say it was an is an ongoing piece that we need to work on” (P3).

**Organizational culture challenges.** The third challenge faced by institutions in operationalizing changes in internal policy as a result of changes to accreditation policy is organizational culture challenges. Five of the eight participants (62.5%) identified challenges related to institutional culture in implementing changes or new practices. Three sub-themes further explore this challenge.

***Building a culture of assessment (P1, P4, P7, P8).*** The first sub-theme under the major challenge of “organizational culture challenges” is building a culture of assessment. Four of eight participants (50%) stated this culture by name or discussed the elements reflective of a culture of assessment. Participant 8 described the challenge of building a culture of assessment through difficulties in enacting learning outcomes assessment practices across the institution as a vehicle for aligning processes with accreditation policy and expectations.

“So we are doing a lot of assessment, but is it really measuring whether students are acquiring outcomes such that we can say our programs have quality? So there's hundreds of reports you can read, but are they really assessing achievement of learning outcomes? Sometimes yes, but sometimes no” (P8).

Participant 4 mentioned the challenge of establishing a culture of assessment to help assist in the institution’s ability to enact change.

“I think that the biggest challenges that we need to establish a culture of assessment on campus, which really gets at the meaning, quality and integrity of a degree. That's what’s underlying in the intent. And that culture of assessment really is a shift and change the way that some on campus think” (P4).

***Accreditation viewed negatively (P1, P2, P4, P8).*** The second sub-theme supporting the major theme of “organizational culture challenges” is the challenge of accreditation being viewed negatively. Four of eight participants (50%) expressed some difficulty in enacting changes needed as a result of changes in accreditation policy due to accreditation being viewed negatively even when leaders connected the policy to institutional practices. Participant 1 described how faculty at the institution can contribute to this challenge.

“There also are a few individuals who are very skeptical. You're still thinking they can fight that battle make assessment go away and you know, and of course those voices, even if you only have two or three of them. They speak up in faculty meetings where we're talking about these types of things. Working through those pieces is a challenge” (P1).

Participant 2, describing a reaction of a group at the institution about the change to the substantive change policy to include non-degree programs, stated, “Well, you know, it's more bureaucracy for them is the way that they see it” (P2).

***Resistance to change (P4, P8).*** Two of eight participants (25%) described an organizational culture where there is an overarching resistance to change in general, no matter whether the change is created by the accreditor. Quotes from the two participants are not provided at the risk of threatening their anonymity. However, both expressed a reticence of faculty groups to embrace change creating a challenging institutional culture in which to implement processes and practices as a result of changing accreditation policy.

***Infrastructure (P1, P6, P7).*** Lastly, the fifth challenge in implementing policies needed as a result of changing accreditation policies is infrastructure. Three of eight participants (37.5%) described this challenge as it relates to support for faculty in assessment activities as well as infrastructure to support requests for new data calculations. Speaking of the infrastructure needed to meet the accreditor’s URR and AGR reporting requirement, Participant 7 shared specific challenges.

“The responsibility really lies with our Institutional Research analysts. And so when it first rolled out it was very tough, but we powered through it. You know, I helped grow as much as I could to be able to make it so that whatever information we could get from our

student information system, we were able to make it so that she can actually get to that data” (P7).

**Research question two summary.** Research question two asked, “What challenges do higher education institutions encounter when implementing changes in accreditation policy?” Four interview questions aligned to research question two were used to seek responses from participants:

- IQ 7: What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy?
- IQ 10: What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- IQ 13: What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change policy to include non-degree programs?
- IQ 15: In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies?

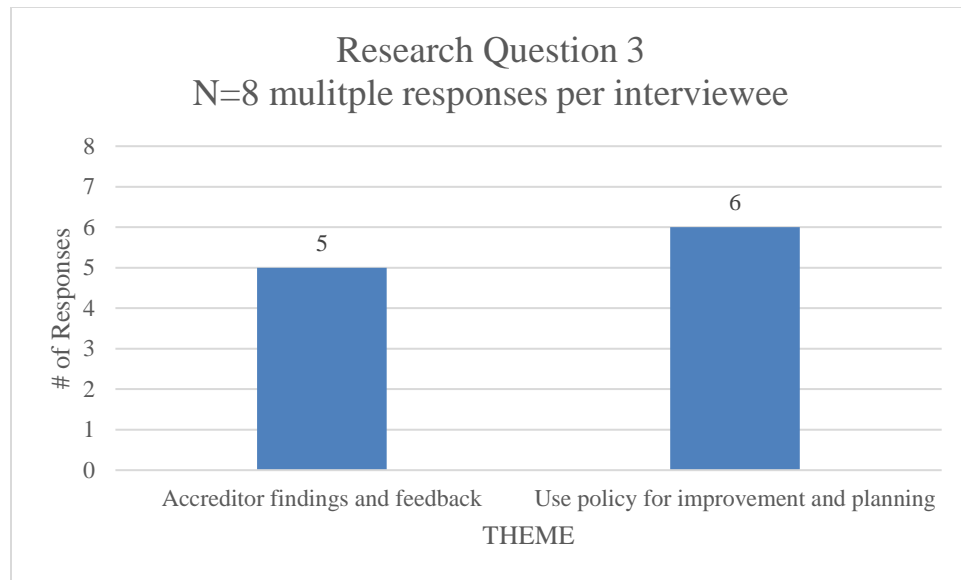
The interview questions asked in connection to the second research question uncovered challenges experienced by participants in implementing changes needed as a result of changing accreditation policy. The five themes that emerged were Determining Accreditor Expectations, Make it Meaningful to Us, Stakeholder Education and Engagement, Organizational Culture Challenges, and Infrastructure. The highest response rate for research question two was 75%, voicing the challenge of making the policy meaningful to the institution.

### **Research Question 3**

Research question three asked, “How do higher education institutions evaluate the success of operationalized changes in practices and policies?” Three interview questions aligned to research question three and utilized in the study were:

- **IQ 8:** How did you and others at your institution evaluate the success of implemented changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?
- **IQ 11:** How did you and others at your institution evaluate the success of implemented changes needed as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- **IQ 14:** How did you and others at your institution evaluate the success of implemented changes needed as a result of the change to the Substantive Change policy to include non-degree programs?

The responses from all participants for the four research questions were analyzed to identify common themes as they relate to the second research question. Two themes were derived from the analysis: a) accreditor findings and feedback, and b) use policy for improvement and planning ecosystem (see Figure 5).



*Figure 5.* RQ3: Themes developed from evaluation methods used to determine the success of operationalized changes in policies or practices.

**Accreditor findings and feedback (P2, P4, P5, P6, P8).** The first method used to evaluate the success of operationalized changes in policies or practices as a result of changes in accreditation policies is through accreditor findings and feedback. Five out of eight participants (62.5%) stated that the ultimate success of implemented practices policies was determined through the approval of the accreditor through standard reporting processes including annual reports and reaffirmation of accreditation. Responses ranged from participants expressing that the outcome of these accreditation process resulted in commendations from the accreditor or lack of citation or recommendation for improvement. Participant 6 provided an explanation about how leaders on campus evaluated the success of operationalized policies for one in particular.

“I think exclusively on the Commission action letter, really, that was all people were looking at. They have a lot of faith in the process and figured if we came out well, then it means that the individual pieces that went into it must have gone well” (P6).

**Use policy for improvement and planning (P1, P2, P3, P6, P7, P8).** The second method used to evaluate the success of operationalized policies and practices as a result in

changes to accreditation policy is the use of the policy for improvement and planning. Six of eight participants (75%) stated that the success of operationalized changes was evaluated through the institution's ability to integrate the changes into the institutional ecosystem to use the implemented policy for improvement and planning. Participant 1 described how their institution evaluated the success of implementing changes needed to meet the URR and AGR reporting requirements.

“So for that one success just meant that we were able to produce the data produce the metrics. And then, you know, be able to use them in, not just in reporting to WASC, but in Campus Conversations about student success and how to improve student success. So for us, just having that data and understand being able to use it in meaningful ways and use it. I think felt like it. It helped us tell a richer story about our institution and the students we've worked with and what success looks like with different populations then we were able to with the more traditional IPEDS graduation rate - that was success” (P1).

Participant 7 discussed how the MQID policy was integrated into the institution's program review process where program leaders used this assessment process to make improvements and strategically plan for the future.

“Annually, as part of the closing of the loop because that's part of the academic program review ecosystem.” The participant further explained, “we give the programs time to have conversations at the program level and then have conversations, what we call faculty, but they're really college level and then a conversation is had with the Academic Vice President, the faculty lead or program leads, and the dean. And they then strategically look at those recommendations and see which ones are tied budgetary and start strategizing over the next five years, how to roll those out, or what things can what

things are low hanging fruit that can be dealt with within fiscal, the current fiscal calendar” (P7).

**Research question three summary.** Research question three asked, “How do higher education institutions evaluate the success of operationalized changes in practices and policies?” The three interview questions aligned to research question three and utilized to collect data were:

- IQ 8: How did you and others at your institution evaluate the success of implemented changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy?
- IQ 11: How did you and others at your institution evaluate the success of implemented changes needed as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements?
- IQ 14: How did you and others at your institution evaluate the success of implemented changes needed as a result of the change to the Substantive Change policy to include non-degree programs?

The responses from participants resulted in the two themes Accreditor Findings and Feedback and Use Policy for Improvement and Planning. The highest response rate for research question three was 75%, voicing the use of policy for planning and improvement as a means for evaluating the success of implemented strategies, while 62.5% stated that the accreditor’s evaluation and findings was used to determine the success of implemented strategies.

#### **Research Question 4**

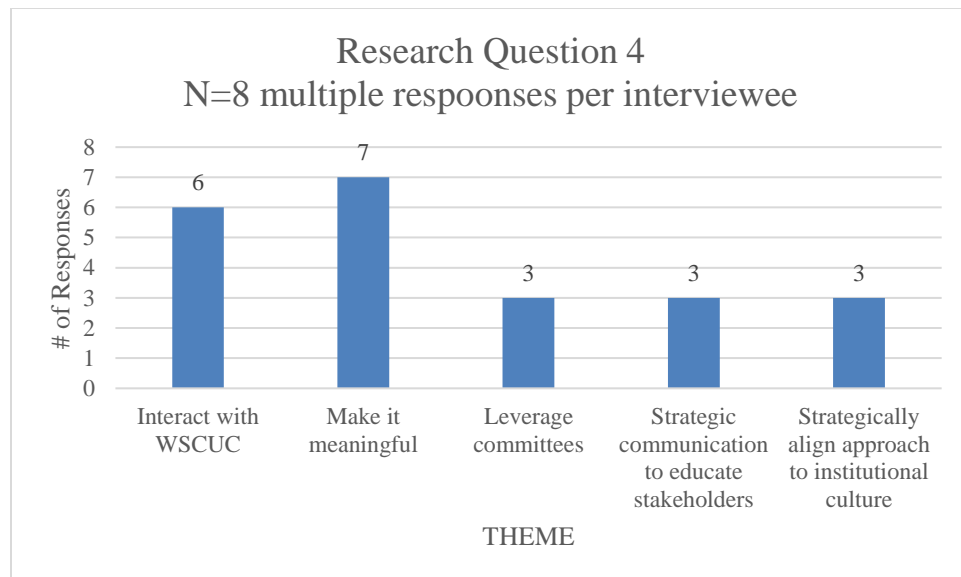
Research question four asked, “What recommendations would higher education institutions make for future implementation of accreditation policy changes?” Two interview questions were connected to this research question:



IQ 17: What recommendations would you make for higher education institutional leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies?

IQ 18: Is there anything else you'd like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies?

The responses from all participants for the two research questions were analyzed to identify common themes as they relate to the fourth and final research question. Results from the analysis indicate five themes: a) Interact with WSCUC, b) make it meaningful, c) leverage committees, d) strategic communication to stakeholders, and e) strategically align approach to institutional culture (see Figure 6).



*Figure 6. RQ4: Themes developed for recommendations for future implementation of accreditation policy changes.*

**Interact with WSCUC.** The first recommendation for future implementation of accreditation policy changes is to interact with WSCUC. Six of eight participants (75%) expressed their recommendation of interacting with WSCUC. This included communicating with accreditation staff and the institution's designated liaison to discuss any questions or to seek

clarification, as well as attend WSCUC events and workshops. In addition, two subthemes portray more detailed information.

***Inform WSCUC policy (P2, P3, P6).*** Three of eight participants (37.5%) recommended that institutional leaders interact with WSCUC, in particular, to inform WSCUC policy. When changes to WSCUC policy are drafted, these drafts are circulated to ALOs for comment and feedback. Feedback is used to alter and improve the policy. When ALOs participate in providing feedback this helps the institution influence the impact the policy has on the institution. Participant 2 expressed this recommendation further.

“One thing I would really like to see is that when policies are circulated more people give feedback about them...I know it to the policies are circulated between meetings and there's an extended period within which institutional representatives can make comments” (P2).

***Anticipate policy changes (P3, P5).*** Two of eight participants (25%) recommended that institutions interact with WSCUC in order to anticipate policy changes. When institutions and their leaders anticipate changes in policy they are able to have more time to prepare the resources, infrastructure, and communication strategies needed to operationalize processes needed to meet the updated policy requirements. Participant 3 explained this as part of her responsibility as an ALO.

“You know, I don't know, those have been my two strategies and then my third strategy is I always try to stay out, and I have not been very good recently since I changed jobs and the ALO part of my job is much smaller, but I try to stay out in front of the policy piece, like what is what is what's coming down the pike so that I'm already thinking about

what can I connect things to have to do this right, what can I connect things to if we're going to have to do this" (P3).

**Make it meaningful (P1, P3, P4, P5, P6, P7, P8).** The second recommendation for future implementation of accreditation policy changes is to make it meaningful (the policy). Seven of eight participants (87.5%) expressed their recommendation to make the changes needed as a result of changes in accreditation policy meaningful to the institution. Similar to the strategy taken by institutions under research question one, participants stated that making changes solely based on accreditation requirements is not a positive or effective approach. Rather, the opposite is true. Participant 6 described this recommendation further.

"I would say downplay the fact that any of it is in response to changes in WASC policy. The reason to go through an exercise like this is mostly because you want to do better. And changes like the three that you're pointing out that we should pay attention to quality beyond the degree granting programs that we should look at student success beyond IPEDS, that we should think about the integrity and quality of our degrees those were all true whether you're getting accredited or not. And that was the, the kind of spin we tended to put on those messages" (P6).

Participant 8 expressed the importance of finding the value of the policy and cited this as a recommendation.

"I would recommend that, if we're talking about ALOs, but people at other institutions that they find value in the change that's requested or coming down the pike, whether you want it to or not, so that you can communicate that value to your institution so that the change can be enacted" (P8).

**Leverage committees (P2, P4, P7).** The third recommendation for future implementation of accreditation policy changes is to leverage committees. Three of eight participants (37.5%) expressed their recommendation to leverage committees to enact and implement changes needed for changing accreditation policies. As with strategies identified under research question one, recommendations for utilizing existing committees as well as creating new accreditation-focused committees were made. Participant 4 described the membership of a recommended committee.

“I think you should involve as many people in that process as possible. Where it is actually feasible and more aligned to accomplish the objectives you’ve set out for because being in an accreditation process really gives you a bird's eye view the mile high view of what the campus is about what it's trying to do, and everything that is happening, and the interconnectedness that exists. And enough people don't have that broad perspective” (P4).

**Strategic communication to educate stakeholders (P1, P2, P5).** The fourth recommendation for future implementation of accreditation policy changes is strategic communication to educate stakeholders. Three of eight participants (37.5%) expressed their recommendation for leaders to be strategic in their communication to educate stakeholders about changing accreditation policy and the internal changes needed to meet the requirements. This recommendation aligns to the finding of the same name under research question one as a strategy utilized by participants. Participant 1 expressed the recommendation to consider who impacted groups might be as part of the communication strategy.

“Understanding the role and who the change is going to impact and figuring out a plan for then communicating out to the relevant campus stakeholders is important and pitching it at the right scope” (P1).

Participant 2 describes how accreditation policies should be woven into the ongoing conversation within ongoing meetings.

“And I think having that be a regular part of cabinet meetings, staff meetings and board meetings is really important too, so regular reports about accreditation and assessment and assessment results. You know, I think, more should know what students are learning, for example. So keeping it - if you have people that really care about that and are driving that then it starts to permeate the institution. And faculty and staff and the board are all more, they think about it. They ask more questions about it. And you're more likely to have an awareness and oversight and monitoring and that kind of thing” (P2).

**Strategically align approach to institutional culture (P1, P2, P8).** The fifth recommendation for future implementation of accreditation policy changes is to strategically align approach to institutional culture. Three of eight participants (37.5%) expressed their recommendation to consider institutional culture when determining the approach that will be taken to operationalize changes needed as a result of changes in accreditation policy. Participant 8 described this recommendation in further detail.

“It's important that you know the culture of the institution so that you don't articulate any policies that might not be aligned with that culture because you would encounter resistance and push back. And so I think understanding what your - who you're dealing with and what the culture of those groups and individuals are is important” (P8).

**Research question four summary.** Research question four asked, “What recommendations would higher education institutions make for future implementation of accreditation policy changes?” The two interview questions connected to this research question were:

- IQ 17: What recommendations would you make for higher education institutional leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies?
- IQ 18: Is there anything else you’d like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies?

The five themes emerged from the analysis for this research question were Interact with WSCUC, Make it Meaningful, Leverage Committees, and Strategic Communication to Educate Stakeholders, and Strategically Align Approach to Organizational Culture. The highest response rate for research question four was 87.5%, expressing the recommendation of making the policy meaningful to the institution. The second highest response rate for this research question was 75%, stating the recommendation of interacting with the accreditor to set the institution up for success in implementing changes needed.

#### **Chapter 4 Summary**

The purpose of this qualitative phenomenological study was to investigate institutions of higher education and how they exercise strategies to operationalize changes needed as a result of changes in accreditation policy, what challenges in implementing changes in accreditation policy they encounter, and how they evaluate the success of operationalized changes in practices and policies. Furthermore, it examined what recommendations institutions have for future implementation of accreditation policy changes. It sought to understand these areas by focusing

on the lived experience of designated Accreditation Liaison Officers at accredited colleges and universities in the WASC Senior College and University Commission region. Eighteen interview questions were formed to explore the four established research questions.

The data collected for this research study was done so through a semi-structured interview process. The researcher coded the data and applied an interrater review process through the engagement of two university faculty members with qualitative research experience to validate the coding results developed by the researcher. Eighteen themes emerged from the analysis of collected data. The six major themes surfaced for strategies used by institutions to operationalize changes needed as a result of changes in accreditation policy were Accreditor Activities and Workshops, Identify the Value, Leverage Committees, Integration with Existing Policies and Processes, Strategic Communication to Educate Stakeholders, and Leverage Cultural Strengths. Four of the five themes, Accreditor Workshops and Activities excluded, were referenced most frequently with eight of eight participants (100%) responding. Five major themes surfaced as challenges higher education institutions encounter in implementing changes in accreditation policy. These challenges were Determining Accreditor Expectations, Making it Meaningful to Us, Stakeholder Education and Engagement, Organizational Culture Challenges, and Infrastructure. Making it Meaningful to Us was the top theme (75% response rate) referenced most frequently. The two principle themes surfaced for methods institutions use to evaluate the success of operationalized changes were Accreditor Findings and Feedback and Use the Policy for Improvement and Planning, the latter being the most frequently referenced at 75%. Five major themes surfaced for recommendations for future implementation of accreditation policy changes. These five themes were Interact with WSCUC, Make it Meaningful, Leverage Committees, Strategic Communication to Educate and Engage Stakeholders, and Strategically

Align Approach to Institutional Culture. Make it Meaningful was referenced most frequently (87.5%) and Interact with WSCUC was the second most referenced theme (75%). Table 6 below provides a summary of themes revealed through the data analysis process for this research study. Chapter five offers a summary of the study and findings, a discussion of the key findings, implications, recommendations for future research, and a conclusion with final thoughts.

Table 6

*Summary of Themes for Research Questions*

<b>RQ1: Strategies to Operationalize Changes</b>	<b>RQ2: Challenges Encountered in Implementing Changes</b>	<b>RQ3: Evaluation of Success of Changes</b>	<b>RQ4: Recommendations</b>
Accreditor workshops and activities	Determining the accreditor's expectations	Accreditor findings and feedback	Interact with WSCUC
Identify the value	Making it meaningful to us	Use for planning and improvement	Make it meaningful
Leverage committees	Stakeholder education and engagement		Leverage committees
Integration with existing policies and processes	Organizational culture challenges		Strategic communication to educate stakeholders
Strategic communication to educate stakeholders	Infrastructure		Strategically Align Approach to Organizational Culture
Leverage cultural strengths			



## **Chapter 5: Conclusions and Recommendations**

It is becoming increasingly more imperative that institutions of higher education become nimbler, as changes in the policies that govern how institutions operate continually shifts to account for the rise in technology, amplified public scrutiny, and growing student loan debt. Kezar (2014) states, “Leaders need to recognize that the deeper interconnection of higher education to the larger social and economic goals of the public make them less independent than in the past and more vulnerable to external forces and demands” (p. 4). The Department of Education, and subsequently regional accreditors, are reacting to the questioning of the value of a college education by revising or implementing new policies that have a sweeping impact on all higher education institutions. The basic assumptions upon which higher education is built is under threat by a constant torrent of disruptive actions (Kuh et al., 2015). Therefore, with changes in policy therein brings changes in the way institutions operate and the rules by which they must comply.

### **Summary of the Study**

The purpose of the study was to investigate institutions of higher education and how they exercise strategies to operationalize changes needed as a result of changes in accreditation policy, what challenges in implementing changes in accreditation policy the encounter, how they evaluate the success of operationalized changes in practices and policies, and what recommendations they have for future implementation of accreditation policy changes. It sought to understand what future processes and strategies in higher education institutions are implemented when changes in regional accreditation policies are encountered by focusing on the lived experience of designated Accreditation Liaison Officers (ALOs) at accredited colleges and universities in the WASC Senior College and University Commission (WSCUC) region. This

research study utilized a qualitative, phenomenological approach, leveraging semi-structured interviews for data collection. Creswell (2014) opines that researchers who engage in qualitative research approaches promote an emphasis on research that values individual meaning, an inductive method, and values the representation and interpretation of complex situations. Building on the nature of this qualitative study, the phenomenological interview is the main method of data collection to discover essence or foundational primary structure of the meaning of an experience or phenomenon (Merriam, 2009). Informed by the literature review, four research questions and 18 interview questions were developed to guide the study.

Participants for this study were identified through the WSCUC website. A purposive sample of eight participants were used in this study. Of the participants, 50% were employed at public institutions of higher education and 50% were employed at private, non-profit institutions. Participants represented institutions of varying size. Twenty-five percent of participants were employed at institutions with 10,000 or more full-time equivalent student enrollment, while 37.5% represented institutions with 6,000-8,000 full-time equivalent student enrollment. An additional 37.5% represented institutions with a full-time equivalent student enrollment of 1,000-3,000. At the time of the interview, participants had been employed at their institution from two and a half to 25 years. In addition, participants had served as ALO at their institution for times ranging between less than one year to ten years. Maximum variation was achieved by selecting ALOs from institutions of varying size, financial structure type, and years in existence.

Data was collected for this study through 18 semi-structured interview questions asked of the eight participants. Five interview questions were developed to glean demographic information from the participant and the remaining 13 were aligned to at least one of the four research questions. The interview questions were developed and validated through an interrater

review process which included prima-facie validity, external expert review validity, and reliability of instrument. Interviews were conducted using Zoom videoconferencing software which produces audio transcripts of each interview recording which were further reviewed for accuracy. Transcriptions were analyzed and coded using NVivo software to uncover common themes. An interrater review process was leveraged to validate the coding and emerging themes. Finally, findings of the research study were summarized and displayed using bar charts to present the common themes across participant experiences as they related to each research question.

### **Summary of the Findings**

The significant results and findings gathered from the 18 semi-structured participant interviews shepherded the data analysis process. The eight participants, designated ALOs at institutions in good standing in the WSCUC region, used their experience in enacting changes within their institution of higher education to respond to the questions. The 13 non-demographic open-ended questions were asked of the participants which resulted in 18 major themes across the four research questions, identifying the strategies, challenges, success measures, and recommendations for future implementation of accreditation policy. The top themes for each of the four research questions are outlined below:

1. Identifying the value of the new or changed accreditation policy was an imperative strategy to move the change from compliance-based to one that is meaningful and useful to the institution.
2. Leveraging committees, both new and existing, was an impactful strategy to ensure communication and collaboration around accreditation policy awareness and to drive action.

3. Integrating the accreditation policy with existing internal policies and processes was a strategy that ensured permanency of changes implemented.
4. Deploying a purposeful communication strategy to educate impacted stakeholders increases the likelihood of positive engagement institution-wide.
5. The cultural strengths should be leveraged to develop and deploy changes.
6. Making the policy meaningful to the institution was a challenge across institution types and sizes.
7. Engaging and educating impacted stakeholders around operationalizing changes needed as a result of changing accreditation policy was a challenge for institutions.
8. Challenges related to the culture of the institution created barriers for institutions when operationalizing changes needed.
9. Participants measured the success of operationalized policy predominantly through the institutions' ability to use what was implemented to inform improvement and planning.
10. Institutions utilized accreditor findings and feedback as a means for evaluating the success of implemented changes needed as a result of changes to accreditation policy.
11. Participants recommended, first and foremost, that institutions make the accreditation policy meaningful to their unique institution to avoid it being perceived as a compliance-driven change.
12. Participants recommended that institutions interact with WSCUC in an ongoing manner to stay abreast of policy changes.

### **Discussion of Key Findings**

The findings of this research study are intended to contribute a greater understanding of the intersection between institutions of higher education and the accreditation policy that informs

its policies, processes, and practices. Findings seek to inform higher institution leaders responsible for successfully employing these practices in order to meet the external accreditation requirements. The discussion of key findings summarizes the major themes for each research question along with a connection to the existing body of literature.

**Strategies higher education institutions exercise to operationalize changes needed as a result of changes in accreditation policy.** The first research question was developed to collect strategies exercised by institutions of higher education to operationalize changes needed as a result of changes in accreditation policy. A total of six themes emerged for research question one. These themes included: Accreditor Workshops and Activities (87.5%), Identify the Value (100%), Leverage Committees (100%), Integration with Existing Policies and Practices (100%), Strategic Communication to Educate Stakeholders (100%), and Leverage Cultural Strengths (100%). Rather than resulting in a discussion of theoretical approaches and philosophies, although participants considered some aspects of sociological and psychological philosophies in their responses, the findings lead to a more practical, palatable approach to enacting change at an institution. Participants were methodical and logical in their discussion of strategies and open to note when strategies went awry. Beattie et al. (2013) cite these unintended outcomes that may occur when interventions or strategies are designed and implemented to meet changing policy. Nonetheless, participants used historical and learned practices to inform their strategies toward employing changes needed.

Organizational culture was one of these considerations, both as an influence on the approach chosen by institution leaders and a contributor to the result. Culture can be viewed as a framework for fashioning order out of the multifaceted and sometimes confusing dynamics of organizational life (Bergquist & Pawlak, 2007). Leveraging pieces of the existing culture assist

in providing a level of comfort amidst change. Change strategies have an increased likelihood of being successful if the strategy is culturally-articulated or aligned well to the institution's culture (Kezar & Eckel, 2002). Participants found that identification of cultural strengths and leaning on such strengths to be a valuable strategy.

While participants did not state that change models were purposefully used to approach enacting change at their institution, an analysis of findings shows that pieces of existing change models were unknowingly being leveraged as part of the strategic effort toward enacting the accreditation policies discussed. Strategies expressed aligned with each of the three phases of William Bridges' Managing Transitions model – phase one where ending, losing, and letting go are areas of focus; phase two where the neutral zone ushers the old processes out and the organization starts to build out and operationalize updated processes; and phase three, where the new beginning occurs, resulting in a renewed energy and commitment that informs the fresh identity as a result of the change(s) (Bridges, 1991). The major three areas of Kruger's (2004) Iceberg Model of change also align to strategies used by participant and their institutions. Strategies considered areas in Kruger's issue management area, as well as management of perceptions and beliefs, and power and politics management (Kruger, 2004). Seven of 12 variables of the Burke-Litwin Causal Model of Change also connect to the findings – mission and strategy; organizational culture; external environment; structure; systems (policies and procedures); motivation; task requirements; and individual skills and abilities (Burke & Litwin, 1992). Lastly, five of eight of Kotter's change model steps connect to strategies used by participants – step 2, create a guiding coalition; step 3, developing a vision and strategy; step 4, communicating the change vision; step 5, empowering broad-based action (which includes providing the needed training to individuals); and step 8, anchoring new approaches in the

culture (Kotter, 2012). Table 7 provides a detailed view of each theme and its alignment with aspects of the four change models explored.

Table 7

*Alignment of Identified Strategies with Four Change Models*

<b>Strategy Theme</b>	<b>Burke-Litwin Causal Model of Change</b>	<b>Kotter's Eight-Step Change Model</b>	<b>William Bridges' Managing Transitions Model</b>	<b>Kruger's Iceberg Model of Change</b>
<b>Accreditor Workshops and Activities</b>	Task requirements; Individual skills & abilities; external environment	Step 5 – Empowering broad-based action	Phase 2 – Neutral zone	Issue management
<b>Identify the Value</b>	Motivation;	Step 3 – Developing a vision and strategy	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone	Management of perceptions and beliefs
<b>Leverage Committees</b>	Structure	Step 2 – Creating a guiding coalition	Phase 2 – Neutral zone; Phase 3 – New beginnings	Power and politics management
<b>Integrate with Existing Policies and Practices</b>	Systems (policies & procedures); management practices	Step 8 – Anchoring new approaches in the culture	Phase 2 – Neutral zone	Issue management
<b>Strategic Communication to Educate Stakeholders</b>	Structure (includes communication)	Step 4 – Communicating the change vision	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone; Phase 3 – New beginnings	Management of perceptions and beliefs
<b>Leverage Cultural Strengths</b>	Organizational culture; mission & strategy	Step 3 – Developing a vision and strategy	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone; Phase 3 – New beginnings	Power and politics management

While the strategies stemming from the data collection and analysis did not align to one change model in particular, institutions were intuitively employing strategies in line with organizational change literature. Participants offered a new replicable and relevant set of strategies that can be applied at any institution, no matter the size, financial structure, or location. Although practical in nature, by mapping the strategic findings to each of the four changes models, it is clear that the strategies utilized by participants and their institutions consider the underpinnings of the psychological (Bridges, 1991), causal (Burke-Litwin, 2012), linear (Kotter,

2007), and political (Kruger, 2004) aspects of change within an organization; however, findings offer additional contributions to the literature.

**Challenges higher education institutions encounter in implementing changes in accreditation policy.** The second research question was deployed to discover the challenges higher education institutions encounter in implementing changes in accreditation policy. A total of five themes surfaced from research question two. These themes were: Determining Accreditor Expectations (50%), Making it Meaningful to Us (75%), Stakeholder Education and Engagement (62.5%), Organizational Culture Challenges (62.5%), and Infrastructure (37.5%). Two of these five themes, Determining Accreditor Expectations and Making it Meaningful to Us, solidify the challenge that comes with receiving a new or updated accreditation policy and, first and foremost, understanding what it means and, moreover, what it means specifically for each institution. In determining the expectations of the accreditor and its policies, several questions can arise. What is it that the accreditor wants? How much room is there for our institution's interpretation of the policy? These were the types of questions participants shared that show how simply defining expectations can be a challenge. In addition, while institutional leaders expressed the importance of identifying the value of the policy as a strategy, the majority of participants also shared that making the policy have meaning within their own institution's context was also a challenge. Regional accreditation policy covers a wide range of institutions – large and small, single campus and multi-campus, online and onsite, institutions within a system and those that are independent, and secular and faith-based just to name a few. Creating policy that all institutions can make meaning of is certainly a robust task. Therefore, it makes sense that participants in this purposive sample study would express this as a challenge.



An institution's culture can be leveraged as a strategy, yet it can also provide a set of challenges when enacting change, especially changes spurred by accreditation policy. Accreditation actions can unbalance institutions by calling into question established routines (Martin et al., 2002). Sometimes faculty within an institution can be resistant to change to protect an infringement on their time, energy, and freedom (Bruns & Bruns, 2007). The cultural dynamics of an institution of higher education create a challenging foundation on which to make institutional improvements. Addressing the behavioral attitudes at the individual and organizational levels is a key to overcoming acceptance issues in implementing change processes (Kruger, 1996). Furthermore, Bridges (1991) encourages leaders to expect employees to overreact, combating these reactions with providing information over and over, and to show how moving on to a new process (and ending the old one), provide a continuity of what matters. Education and engagement of stakeholders, therefore, is a worthwhile and necessary activity albeit a challenge across institutions due to cultural, structural, and psychological influences.

**How higher education institutions evaluate the success of operationalized changes in practices and policies.** The third research question was developed to explore how higher education institutions evaluate the success of operationalized changes in practices and policies stemming from changes in accreditation policy. Two major themes emerged from research question three. These themes included: Accreditor Findings and Feedback (62.5%) and Use the Policy for Improvement and Planning (75%). Participants who stated that their institutions use accreditor findings and feedback to evaluate the success of what was implemented used the ongoing reporting processes such as the annual report and the reaffirmation of accreditation self-study findings to determine success. Institutions were successful if the policy was implemented and no recommendations or citations occurred. In addition, some institutions determined their

success to be even more increased when receiving a commendation from the accreditor on a particular policy.

Research has noted how accreditation activities can be used for institutional improvement in areas including learning outcomes assessment, development of mission-driven activities, and strategic planning for improvement. In evaluating the success of implemented strategies, participants in this study move beyond merely using the policy to improve the institution, but also determine the success of the implemented change when it becomes part of the institutional ecosystem. When woven into day-to-day process and by becoming a part of institutional conversation, successful operationalized changes augment the information upon which strategic decisions are developed. In the Burke-Litwin Causal Model of Change this is ultimately the Individual and Organizational Performance output stemming from the change. It shows the achievement and effort of the work put into the organization and the result (Burke & Litwin, 1992). When an institution can use a policy to inform planning and improvement it can be deemed a success.

**Recommendations for higher education institutions for future implementation of accreditation policy changes.** The fourth research question was deployed to uncover recommendations for higher education institutions for future implementation of accreditation policy changes. Five themes emerged from research question four: Interact with WSCUC (75%), Make it Meaningful (87.5%), Leverage Committees (37.5%), Strategic Communication to Educate and Engage Stakeholders (37.5%), and Strategically Align Approach to Institutional Culture (37.5%). Not surprisingly, these five themes align directly to the strategies used by participants with the exception of one unmentioned theme. While these recommendations connect to the strategies discussed, there are some differences in how the recommendations were

expressed – note that the percentages of respondents for each was lower than those of their strategy theme counterparts. Nonetheless, participants provided practical, application-based recommendations for future implementation of accreditation policy, contributing new information to the body of literature.

To analyze the alignment of recommendations with current change model literature, as with the strategies identified for research question one, recommendations connect to aspects of the four change models explore in Chapter 2. Five of 12 variables from the Burke-Litwin Causal Model of Change align with recommendations of participants – structure, organizational culture, motivation, task requirements, and external environment (Burke & Litwin, 1992). Four of Kotter’s eight steps in the change model are connected to this research questions findings – step two, creating a guiding coalition; step three, developing vision and strategy; step four, communicating the change vision; and, step 5, empowering employees for broad based action (Kotter, 2012). All three major areas of Kruger’s Iceberg of Change Model are aligned to the recommendations of participants for consideration in operationalizing internal policies and practices as a result of changing accreditation policy: (1) issue management, (2) management of perceptions and beliefs, and (3) power and politics management (Kruger, 1996). Lastly, findings stemming from participants responses are connected to all three phases of the William Bridges’ Managing Transitions model as the psychological considerations of change are aligned to recommendations; (1) ending, losing, and letting go, (2) the neutral zone, and (3) new beginnings (Bridges, 1991). Table 8 below provides a visual map of this alignment.

Table 8

*Alignment of Recommendations with Four Change Models*

<b>Recommendation Theme</b>	<b>Burke-Litwin Causal Model of Change</b>	<b>Kotter's Eight-Step Change Model</b>	<b>William Bridges' Managing Transitions Model</b>	<b>Kruger's Iceberg Model of Change</b>
<b>Interact with WSCUC</b>	Task requirements; Individual skills & abilities; external environment	Step 5 – Empowering broad-based action	Phase 2 – Neutral zone	Issue management
<b>Make it Meaningful</b>	Motivation; Individual needs and values	Step 3 – Developing a vision and strategy	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone	Management of perceptions and beliefs
<b>Leverage Committees</b>	Structure	Step 2 – Creating a guiding coalition	Phase 2 – Neutral zone; Phase 3 – New beginnings	Power and politics management
<b>Strategic Communication to Educate Stakeholders</b>	Structure (includes communication)	Step 4 – Communicating the change vision; Step 5 – Empowering broad-based action	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone; Phase 3 – New beginnings	Management of perceptions and beliefs
<b>Align Strategic Approach to Institutional Culture</b>	Organizational culture; mission & strategy; culture	Step 3 – Developing a vision and strategy	Phase 1 – ending, losing, and letting go; Phase 2 – Neutral zone; Phase 3 – New beginnings	Power and politics management

**Implications of the Study**

The implications of this study increase with every new year, and every attempt by lawmakers to re-define policy for higher education institutions. Whether new and changing policies decrease regulation, enact new performance metrics and standards, or result in the removal of regional accreditation altogether, institutions need to be prepared to pivot accordingly. As such, findings from this study provide insights for both university leaders and policymakers alike.

**Higher education institution leaders.** Accreditation is a high-stakes endeavor for institutions of higher education. Much weighs on the institution's ability to maintain good status with regional accreditors including the ability to accept Title IV federal funding (student loans),

attract sufficient enrollment to remain competitive and to stay in business, and maintain a positive reputation that allows it to be sustainable over time. Regional accreditation efforts take a substantial amount of time and resources, two things that are finite. Thus, institutions must be strategic in their approach to ensuring they are meeting the standards put forth by their accreditor.

With the continued anticipation of change to policy on the horizon, it is ever more important for leaders to consider the proven strategies and challenges that are a part of institutional dynamics spurred by changes related to accreditation policy. Institutional leaders need also to be a part of the formation of accreditation policy. As one of the findings suggest, WSCUC circulates new and changes to policy to ALOs for review and comment. Leaders should accept this opportunity to influence policy and shape it in a way that will provide the most meaning and ability to use it for improvement and planning.

Lastly, higher education leaders should be cognizant of the organizational leadership and change literature to leverage areas that may be helpful in thinking strategically about how to employ strategies to meet these types of changes. Leaders also must consider the literature as it relates to the implementation of change strategies, the impact of organizational culture on the approach and result, and how to consider the psychological processes that are at the forefront of the minds of individual impacted and attempting to lead the change. While this study identified the need for a model that may provide additional insight for higher education in general, it also offered practical strategies for utilization. Institutions should use these changes as opportunities to learn and create a cycle of continuous improvement, strengthening its ability to adapt.

**Regional accreditors and other policy-makers.** This study also advances insights for regional accreditors and policy-makers. While the groups who make the policies are being

pressured by the public and from all political angles, it is imperative for these groups to understand the full impact the policies have on the institutions they regulate and the students the institutions serve. Regional accreditors and federal regulators should continue to engage institutional leaders in conversation and analysis around proposed policy changes. These oversight bodies should also consider ways to increase participation of institutions in giving feedback. For instance, WSCUC circulates new or updated policies via email to ALOs and asks that feedback be provided. Perhaps there are other means to gather this feedback or engage ALOs in a conversation around it rather than have individual institutions offer non-anonymous insight. In addition, there also is opportunity for accreditors to seek pre-and post-implementation feedback from institutions when these policies are enacted. Furthermore, federal lawmakers should consider ways to increase input from larger groups of institutional leaders that are more diverse in size and type.

These regulating bodies are expected to set the expectations of quality and accountability for institutions of higher education. As such, they should understand the impact their standards make on these institutions. This study helped to unveil the practical implications of policy changes on institutions including the organizational resources and infrastructure required. Ultimately, these policy changes should be thoughtful and allow for institutions to use them for improvement. Accreditors should continue to expand educational opportunities to help leaders understand the expectations related to the policy and help institutions make meaning of the policy for their unique organization.

### **Recommendations for Future Research**

This qualitative, phenomenological study gathered data through interviews of ALOs in the WSCUC accreditation region. The intent of the study was to explore the strategies,

challenges, success measures, and recommendations shared by the participants to inform future efforts to enact change in institutions as a result of changes in accreditation policy by institutional leaders. Integrating the relative literature in accreditation and accountability in higher education, organizational change in higher education, use of accreditation to enact change, and organizational change models and knowledge from the eight participants has resulted in an extensive study that can be added to the existing body of research. Further efforts to expand this body of literature on the impact of accreditation policy, the following studies are recommended for future research:

1. A study that analyzes the existing data of published commendations and recommendations of accreditation efforts for institutions in the WSCUC region to identify policy areas that are implemented more successfully and those that might be a struggle for institutions.
2. A grounded theory study that results in a change model specific to higher education that considers nuances including cultural norms, such as active faculty governance bodies, and external validation.
3. A study of the migration patterns of ALOs. The majority of ALOs interviewed had not served as ALO at another institution. In addition, during the course of the study, one potential participant had left her institution and one actual participant in this study is currently no longer listed as the ALO of her institution.
4. A study of WSCUC peer-reviewers to gain their perspective on the research questions asked in this study. It would be interesting to evaluate the responses of the peer review team with those of the institution's ALO to analyze intersections.

5. A replication of this study for ALOs at institutions within the WSCUC region that are candidates for initial accreditation. Strategies, challenges, success measures, and recommendations could benefit future efforts by institutions seeking regional accreditation for the first time.
6. A recreation of this study for ALOs who are in other accreditation regions. The instrument would need to be altered to frame questions around policy changes specific to the region under study.
7. A study of the strategies, challenges, success metrics, and recommendations of regional accrediting bodies in their efforts to implement changes in Department of Education and other federal laws. How do these agencies interpret federal policy and create accreditation policy that ensures institutions of higher education meet these requirements. This would further explore the change implications in the string of regulators for higher education policy.
8. A study of shared governance structures in higher education institutions to determine which structures are best suited to support successful accreditation efforts.

## **Final Thoughts**

This qualitative, phenomenological approach to conducting a research study that explored how institutions of higher education operationalize accreditation policy within their institution provided a unique platform to discover the shared experiences of ALOs in enacting changes. The semi-structured interviews gave an in-depth look into the granular dynamics as well as the overarching considerations taken into account at institutions when thinking about leading a change initiative. ALOs have a distinctive view into the institution – this person is usually not the final decision-making authority, but must have enough influence at the institution to effect its



operational and academic practices. Through this lens, this study was able to identify pertinent information that can be applied at other institutions across the nation and potentially the world.

Overall, there was not a sense that institutions were unhappy with policies or changes to policies that were being made by the accreditor. In fact, most ALOs felt positive about how the policies help to ensure quality and student success across departments. For as much as accreditor and external pressure is seen as negative so many times by different groups at institutions, the policies explored in this study were predominately viewed as beneficial. However, with efforts to reauthorize the Higher Education Act, along with Department of Education activity to impact higher education policy through negotiated rule-making, institutions should be prepared for more sweeping changes that may not be seen as beneficial.

Existing change models offered in the literature provided a sensible theoretical framework for investigating the strategies institutions can leverage along with methods to mitigate challenges that may arise. However, findings in this research suggest the opportunity for a more practical, higher education-based model that may provide additional insights for institutional leaders. This study contributes to the existing literature and offers suggestions for continued study, using it as a basis, as well as other thoughts for related studies. Furthermore, the changing landscape of higher education will continue to push change upon this industry, providing increased opportunity for understanding even more so, the intricacies around change management and cultural dynamics that impact change in institutions of all sizes, types, and across regions.

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## APPENDIX A

### IRB Approval Letter



Pepperdine University  
24255 Pacific Coast Highway  
Malibu, CA 90263  
TEL: 310-506-4000

#### NOTICE OF APPROVAL FOR HUMAN RESEARCH

Date: January 30, 2019

Protocol Investigator Name: Kimberly Levey

Protocol #: 18-05-802

Project Title: When Accreditation Policy Changes: An Exploration of How Institutions of Higher Education Adapt

School: Graduate School of Education and Psychology

Dear Kimberly Levey:

Thank you for submitting your application for exempt review to Pepperdine University's Institutional Review Board (IRB). We appreciate the work you have done on your proposal. The IRB has reviewed your submitted IRB application and all ancillary materials. Upon review, the IRB has determined that the above entitled project meets the requirements for exemption under the federal regulations 45 CFR 46.101 that govern the protections of human subjects.

Your research must be conducted according to the proposal that was submitted to the IRB. If changes to the approved protocol occur, a revised protocol must be reviewed and approved by the IRB before implementation. For any proposed changes in your research protocol, please submit an amendment to the IRB. Since your study falls under exemption, there is no requirement for continuing IRB review of your project. Please be aware that changes to your protocol may prevent the research from qualifying for exemption from 45 CFR 46.101 and require submission of a new IRB application or other materials to the IRB.

A goal of the IRB is to prevent negative occurrences during any research study. However, despite the best intent, unforeseen circumstances or events may arise during the research. If an unexpected situation or adverse event happens during your investigation, please notify the IRB as soon as possible. We will ask for a complete written explanation of the event and your written response. Other actions also may be required depending on the nature of the event. Details regarding the timeframe in which adverse events must be reported to the IRB and documenting the adverse event can be found in the *Pepperdine University Protection of Human Participants in Research: Policies and Procedures Manual* at [community.pepperdine.edu/irb](http://community.pepperdine.edu/irb).

Please refer to the protocol number denoted above in all communication or correspondence related to your application and this approval. Should you have additional questions or require clarification of the contents of this letter, please contact the IRB Office. On behalf of the IRB, I wish you success in this scholarly pursuit.

Sincerely,

Judy Ho, Ph.D., IRB Chair

cc: Mrs. Katy Carr, Assistant Provost for Research

## APPENDIX B

### Recruitment Letter

Dear Potential Research Participant,

My name is Kim Levey, and I am a doctoral student in the Graduate School of Education and Psychology at Pepperdine University. I am conducting a research study examining how institutions operationalize policies and practices as a result of changes in accreditation policy, and you are invited to participate in the study. As such, I am interviewing Accreditation Liaison Officers in the WSCUC region to discover best practices. If you agree, you are invited to participate in an interview where I will ask a series of questions about your experiences in implementing regional accreditation policies.

The interview is anticipated to take no more than one hour and interview and will be conducted through videoconferencing or audio conference technology. Participation in this study is voluntary. Your identity as a participant will remain confidential during and after the study. You will be assigned a numeric code for identification purposes and your name and place of employment will remain confidential.

Please contact me within the next week to participate (xxxxxx@pepperdine.edu or xxx-xxx-xxxx (mobile)). This study is being conducted under the supervision of my Dissertation Chair, Dr. Andrew Harvey (xxxxxxxx@pepperdine.edu). Thank you for your consideration.

Sincerely,

Kim Levey  
Pepperdine University  
Graduate School of Education and Psychology  
Status: Doctoral Student

## APPENDIX C

### Informed Consent

#### **PEPPERDINE UNIVERSITY**

#### *Graduate School of Education and Psychology*

#### **INFORMED CONSENT FOR PARTICIPATION IN RESEARCH ACTIVITIES**

#### **WHEN ACCREDITATION POLICY CHANGES: AN EXPLORATION OF HOW INSTITUTIONS OF HIGHER EDUCATION ADAPT**

You are invited to participate in a research study conducted by Kim Levey, MPA and Andrew Harvey, Ed.D. at Pepperdine University, because you are an Accreditation Liaison Officer (ALO) in the WASC Senior College and University Commission (WSCUC) region and your institution is in good standing with WSCUC. Your participation is voluntary. You should read the information below, and ask questions about anything that you do not understand, before deciding whether to participate. Please take as much time as you need to read the consent form. You may also decide to discuss participation with your family or friends. You will also be given a copy of this form for your records.

#### **PURPOSE OF THE STUDY**

The purpose of the study is to investigate institutions of higher education and how they exercise strategies to operationalize changes needed as a result of changes in accreditation policy, what challenges in implementing changes in accreditation policy they encounter, how they evaluate the success of operationalized changes in practices and policies, and what recommendations they have for future implementation of accreditation policy changes. It seeks to understand what future processes and strategies in higher education institutions are implemented when changes in regional accreditation policies are encountered by focusing on the lived experience of designated Accreditation Liaison Officers at accredited colleges and universities in the WASC Senior College and University Commission region.

#### **STUDY PROCEDURES**

If you volunteer to participate in this study, you will be asked to respond to 15 open-ended interview questions that correspond to four research questions. Interview questions will cover your experience operationalizing accreditation policy at your institution in your role as an ALO. You will be asked for a convenient time by which the researcher can interview you through zoom videoconferencing technology for one hour. In the event that you do not wish to consent to video-recording, audio-recording will be used only. If you would like to opt out of both the video- and audio-recording, you may still elect to participate in the study, and the researcher will take notes during the interview.

## **POTENTIAL RISKS AND DISCOMFORTS**

The potential and foreseeable risks associated with participation in this study include:

- Discomfort in recalling experiences that may have created stress
- Time taken to complete the interview does not allow the participant to use that time for his/her own purposes

## **POTENTIAL BENEFITS TO PARTICIPANTS AND/OR TO SOCIETY**

While there are no direct benefits to the study participants, there are several anticipated benefits to society which include an improved understanding about the impact of accreditation policy changes on institutions of higher education. Anticipated beneficiaries include university leaders, ALOs, and policymakers alike.

## **CONFIDENTIALITY**

I will keep your records for this study confidential as far as permitted by law. However, if I am required to do so by law, I may be required to disclose information collected about you. Examples of the types of issues that would require me to break confidentiality are if you tell me about instances of child abuse and elder abuse. Pepperdine's University's Human Subjects Protection Program (HSPP) may also access the data collected. The HSPP occasionally reviews and monitors research studies to protect the rights and welfare of research subjects.

Initially, the data will be stored in the zoom cloud system, secured through end-to-end encryption and behind established firewalls. The data will then be downloaded and stored on a password protected computer in the principal investigators place of residence. The data will be stored for a minimum of three years. The data collected will be coded, de-identified, and transcribed, and all recordings will be destroyed. Any reference made to you or your respective institution will be redacted from the transcripts. Upon completion of each transcript, the associated video and/or audio file will be destroyed. The transcribed file will not be named to ensure additional confidentiality. All records, handwritten and electronic, will be stored in a secure file cabinet in the researcher's locked office.

## **PARTICIPATION AND WITHDRAWAL**

Your participation is voluntary. Your refusal to participate will involve no penalty or loss of benefits to which you are otherwise entitled. You may withdraw your consent at any time and discontinue participation without penalty. You are not waiving any legal claims, rights or remedies because of your participation in this research study.

## **ALTERNATIVES TO FULL PARTICIPATION**

The alternative to participation in the study is not participating or completing only the items which you feel comfortable.



### **EMERGENCY CARE AND COMPENSATION FOR INJURY**

If you are injured as a direct result of research procedures you will receive medical treatment; however, you or your insurance will be responsible for the cost. Pepperdine University does not provide any monetary compensation for injury

### **INVESTIGATOR'S CONTACT INFORMATION**

I understand that the investigator is willing to answer any inquiries I may have concerning the research herein described. I understand that I may contact Kim Levey at kimberly.levey@pepperdine.edu, or Andrew Harvey at andrew.harvey@pepperdine.edu if I have any other questions or concerns about this research.

### **RIGHTS OF RESEARCH PARTICIPANT – IRB CONTACT INFORMATION**

If you have questions, concerns or complaints about your rights as a research participant or research in general please contact Dr. Judy Ho, Chairperson of the Graduate & Professional Schools Institutional Review Board at Pepperdine University 6100 Center Drive Suite 500 Los Angeles, CA 90045, 310-568-5753 or [gpsirb@pepperdine.edu](mailto:gpsirb@pepperdine.edu).

## APPENDIX D

### Interview Questions

#### Demographic Questions

1. How long have you been employed by your institution?
2. How long have you served as ALO of your institution?
3. What other roles do you currently have within your institution
4. How many other institutions within the WSCUC region have you served as ALO?
5. How many years total have you served as an ALO across institutions?

#### Questions Aligned to Research Questions

6. What strategies did you use at your institution to implement the changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ1)
7. What challenges did you encounter in implementing changes needed within your institution as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ2)
8. How did you and others at your institution evaluate the success of implemented changes needed as a result of the Meaning, Quality, and Integrity of Degrees policy? (RQ3)
9. What strategies did you use at your institution to implement the changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ1)
10. What challenges did you encounter in implementing changes needed within your institution as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ2)
11. How did you and others at your institution evaluate the success of implemented changes needed as a result of the Unit Redemption Rate and Absolute Graduation Rate reporting requirements? (RQ3)
12. What strategies did you use at your institution to implement the changes needed as a result of the change to the Substantive Change policy to include non-degree programs? (RQ1)
13. What challenges did you encounter in implementing changes needed within your institution as a result of the change to the Substantive Change policy to include non-degree programs? (RQ2)

14. How did you and others at your institution evaluate the success of implemented changes needed as a result of the update to the Substantive Change policy to include non-degree programs? (RQ3)
15. In what ways did the historic or current institutional culture impact the ability to implement changes needed as a result of changes to the three aforementioned accreditation policies? (RQ1 & RQ2)
16. What change models, if any, were used to operationalize changes within your institution as a result of changes to the three aforementioned policies? (RQ1)
17. What recommendations would you make for higher education institutional leaders as they approach enacting changes needed to meet changes in WSCUC accreditation policies? (RQ4)
18. Is there anything else you'd like to share about your experience in enacting institutional changes spurred by changes in WSCUC accreditation policies?

## APPENDIX E

### Non-Disclosure Review Form for Inter-rater Reliability

#### PEPPERDINE UNIVERSITY

##### INTER-RATER PEER REVIEWER NONDISCLOSURE

Reviewer will protect the information related to participant interview data and the review associated with the dissertation entitled *When Accreditation Policy Changes: An Exploration of How Institutions of Higher Education Adapt*.

The reviewer will be privy to notes, transcripts, and coding associated with participant interviews. As such, the reviewer shall treat all interview data as protected information, regardless of the format (e.g., electronic, paper, oral). Additionally, the reviewer agrees to not use, share, or disclose the interview data with anyone other than the researcher. Though the interview files will only contain redacted information and participant codes, this form serves as an additional level of confidentiality.

##### SIGNATURE OF PEER REVIEWER

I have read the information provided above and have been given a chance to ask questions. My questions have been answered to my satisfaction and I agree to the terms and conditions outlined herein. I have been given a copy of this form.

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Name of Reviewer

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Signature of Reviewer

---

Date