

TO: ALA Executive Board

RE: Accreditation Working Group

ACTION REQUESTED:

Review draft report and provide feedback

ACTION REQUESTED BY:

Jennifer Sweeney, Chair, Accreditation Working Group (AWG) (Information School, SJSU)

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DRAFT OF MOTION:

Review and provide feedback on the draft report of the Accreditation Working Group (AWG)

DATE: April 15, 2021

Background:

The 2019 Steering Committee on Organizational Effectiveness (SCOE) *Forward Together* proposal questioned whether the ALA Committee on Accreditation (COA) should operate under a new governance structure and specifically presented formation as a “Commission.” Consequently, the ALA Executive Board approved appointment of a COA/SCOE Accreditation Working Group (AWG) to consider a change in name or governance and indicated the overall objectives for the group as follows:

- Respond to SCOE recommendations regarding COA and its structural position within/around the Association, keeping within timelines established for implementation of recommendations in the SCOE report for Association approval.
- Improve awareness of the membership about the work of the Office on Accreditation (OA) and the Committee on Accreditation (COA).

- Improve, without compromise, the transparency of operations and leadership of OA in its support of COA.
- Respect and adhere to the CHEA (Council of Higher Education Accreditation) required independence of accreditation decisions about programs of library and information studies.

The AWG met from September 2020 through Spring 2021. The group focused its investigation on the current status of accreditation governance in COA and other accrediting bodies, the current state of the LIS program environment as it relates to accreditation, and the prior recommendations of the [Ad Hoc Task Force on External Accreditation](#) (January 2002).

Findings

The AWG has concluded that the findings of the January 2002 report continue to merit consideration, and in fact, are even more urgent in 2021. The AWG finds:

- *COA's position as a committee within ALA creates barriers to effective operations.* These include 1) increased potential for conflict of interest in membership appointments, 2) potential perception of lack of independence in accreditation decision making, and 3) ALA governance procedures that hinder COA in addressing CHEA requirements in a timely manner.
- *Current fiscal operation of the COA is unsustainable.* Fees collected from programs for accreditation account for only 25% of COA budget, and at the same time, many accredited programs are unable to support increased fees. ALA is not positioned to maintain the current level of support of COA, which currently stands at 75% of COA budget.
- *Ongoing and rapid diversification of the LIS professions are not adequately addressed by the current committee membership and structure.* Relevant professional associations that represent both longstanding and emerging fields in LIS and cognate disciplines (SLA, MLA, SAA, ASIST, iSchools, etc.) are not represented in COA membership.

Potential solutions

To meet these challenges, the AWG sees a range of possible solutions, with a range of associated fiscal risk:

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- Least risk: Establish a separate, independent 501(c)3 corporation for the accrediting body, supported by a coalition of relevant professional associations (including ALA), as laid out in the External Accreditation Proposal presented by the 2002 Task Force Report.
- Moderate risk: Establish a new commission or council within ALA with independent governance and membership procedures, supported by a coalition of relevant professional associations.
- Most risk: Continue the current organization and governance.

The AWG finds that the risk to accreditation of LIS professional programs is immediate and existential if no action is taken. LIS programs will see less value in accreditation that does not address emerging and growing professional fields, and will find it more difficult to justify the investment in LIS accreditation that does not meet the needs of its constituents. The enclosed report provides support for these key findings from the AWG investigation as well as details on the range of solutions.

AWG Draft Report attached:

Toward a More Effective and Sustainable Structure for Accreditation of Programs in Library and Information Studies

Toward a More Effective and Sustainable Structure for Accreditation of Programs in Library and Information Studies

Background

The Accreditation Working Group (AWG) was established in 2020 to identify a more effective structure for ALA accreditation by addressing the accreditation implications in *Forward Together*. The report presented here brings together information gathered by the AWG from the literature, an environmental scan of current accreditation and LIS issues, analysis of Association of Specialized and Professional Accreditors (ASPA) and Council for Higher Education Accreditation (CHEA) member characteristics and requirements, and prior findings of the ALA [Task Force on External Accreditation \(January 2002 report\)](#). The group will also gather input from selected LIS programs during Spring 2021. The AWG will incorporate all feedback into its final recommendations to be provided to the Executive Board by the 2021 Annual Conference. This draft report is being provided for Executive Board discussion and feedback.

This report addresses several critical issues for governance of LIS accreditation: 1) fiscal unsustainability of the current structure of COA; 2) barriers inherent in the current governance structure that increase potential conflict of interest in membership, independence of decision making, and ability to address CHEA requirements; and 3) the need to address the interests of rapidly diversifying LIS professions fed by rapidly diversifying LIS programs.

This report presents the following sections: 1) What is accreditation? 2) How does COA compare to other accrediting agencies? 3) What has changed in the LIS professional environment since the 2002 Task Force? 4) How has accreditation evolved? 5) What are the challenges and risks for COA? 6) What next steps are recommended?

1. What is accreditation?

“Accreditation” is the voluntary review of the quality of a higher education program and/or institution, and is the major way that students, families, government officials, and others know that an institution or program provides a quality education.¹ The [ALA Office of Accreditation](#) provides external review and validation of master’s level library and information studies programs, and is recognized by the [Council for Higher Education Accreditation](#) (CHEA). ALA has carried out the accreditation of education programs for librarianship since 1924.

¹ Council for Higher Education Accreditation (2021). <https://www.chea.org/about-accreditation>

2. How does COA compare to other accrediting agencies?

The AWG reviewed the structure of other programmatic accrediting agencies from the membership of the Association of Specialized and Professional Accreditors (ASPA). This review of 61 accrediting agencies found that:

- 56% of ASPA agencies were legally separate from a parent professional organization.
 - *COA is a committee of the ALA.*
- 89% receive direct revenue from accreditation fees, etc. collected from programs. Of those who receive direct revenue, this revenue accounts for 78% of the budget.
 - *COA derives 25% from direct revenue, relying on ALA for the balance of its funding.*
- Case studies of eight agencies found that six of the eight involved other collaborating entities in decision making and revenue (related professional, academic, and other associations).
 - *COA includes a representative from ALISE, but no representation from other associations.*
- 72% of organization names include the term “Commission,” “Council,” or “Board”. Only two agencies, besides COA, use the term “Committee” in the organization’s name.
 - *Within ALA’s committee structure, COA requires approval from ALA for changes in policies, procedures, standards, and membership.*
- Accreditation decision-making bodies for ASPA members typically consist of educators, practitioners, and members of the public, with some also including students and representatives of various professional/trade groups. The average size of the decision making body is 19. Appointment mechanisms vary, but for all of the accreditors who are legally separate from the parent organization and for many of the accreditors who are part of a parent organization, the decision-making body elects its own members, rather than having members appointed by the parent organization.

- *ALA- COA consists of 12 members appointed by the ALA president-elect, including educators, practitioners, and two members of the general public.*

3. What has changed in the LIS environment since the 2002 Task Force report?

When the Congress on Professional Education (COPE) recommended in 1999 the formation of an ALA Task Force on an Independent Accrediting Body, it did so recognizing that not only was the library profession changing, but also that library schools had already changed to a certain degree. During the 1990s and beyond, LIS programs expanded their curriculum to include a variety of emerging specializations, diversifying the traditional core of LIS, and engaging new stakeholders sharing common knowledge, competencies, and values associated with the field of LIS. Library schools changed the names of their programs, emphasized the broader coverage of information, information studies, information science, etc., some to the exclusion of library science, library studies, etc., in the new moniker. This trend has continued, sometimes corresponding with a reduced emphasis on traditional LIS components.

The iSchool Movement, which gained momentum and international status from the 1990s onward, is now known as the [iCaucus](#). Its current mission statement notes that “the information field is widely recognized for creating innovative systems and designing information solutions that benefit individuals, organizations, and society.”² In August 2020, the iSchool Caucus, ASIS&T, and the Association for Library and Information Science Education (ALISE), signed a Memorandum of Understanding establishing an informal partnership, the iFederation, signaling further and continued blurring of boundaries within and across information-intensive education and research programs.

This current examination of LIS accreditation comes at a similarly dynamic and fluid time of change within the information professions and the field. Accreditation of LIS programs, per se, may now represent only a portion of an iSchool’s curriculum and levels of credentialing. Programs are preparing graduates for an increasingly diverse array of professions and placements – career opportunities where having a degree from a program with ALA accreditation may not be a requirement, or may not be judged to be relevant.

Increasingly students are being recruited for jobs in areas of user experience design (UXD), data science, artificial intelligence (AI), health informatics, etc., as well as cultural heritage positions requiring expertise in museum studies, archives, etc. These new directions may pose challenges for schools with diverse programs where there may be a requirement to

² ² <https://ischools.org/The-iSchool-Movement>

meet standards of two or more accrediting bodies and the resources and costs associated with each.

With budget constraints, choices may have to be made as to which accreditation to pursue based on job market demands. At the same time, diversification may provide opportunities for creative partnerships among different, but information-related accrediting bodies. Such partnerships become more attractive when based on commonalities, and motivated by an appreciation of maximizing limited fiscal and other resources required of an accreditor. The idea of bringing different associations together around a common focus on quality of education for a variety of information professions echoes the intentions of the External Accreditation Proposal brought to the ALA Executive Board in January 2002. The iSchool Caucus also recognizes that information professionals are increasingly “working in settings emerging from the growing information, technology, and knowledge economy.” In its recent [draft guidelines for professional LIS education](#), IFLA also acknowledges the need for educational programs to reach a broader audience of students and prepare professionals for work beyond libraries.

4. How has accreditation evolved?

In the twenty years since the initial COPE report was issued, accreditation has evolved in several ways. Perhaps one of the most significant changes has been the 2019 action by the U.S. Department of Education (DOE) to remove the regional monopoly rules for the traditional “gold standard” institutional accreditors such as Middle States, WASC, SACS, and HLC. Before this change, national accreditors did not have the esteem of regional accreditors. National accreditation was often pursued by institutions that could not meet various requirements of the regional accreditors. By eliminating the monopoly regional accreditors had within a particular region of the country, the DOE created a competitive market where the former regional accreditors now may accredit institutions anywhere in the US. This has fundamentally changed institutional accreditation and it remains to be seen what the long-term implications of this change may be for specialized accreditors like COA.³

Specialized accreditation has seen significant changes in recent decades. Three examples in the specialized accreditation realm, teacher preparation, business education, and nursing education, point out the potential issues for ALA COA concerning the cost of accreditation

³ Kees, D. (2020). Changing Credentials in College Accreditation. *The Regulatory Review*. Retrieved from <https://www.theregreview.org/2020/02/25/kees-changing-credentials-college-accreditation/>

overall, relevance of accreditation to the changing portfolios of programs within a college, and questions related to standards and how they adapt to given institutional contexts.

National Council for Accreditation of Teacher Education (NCATE) was originally formed in 1954 to accredit teacher preparation programs. However, given differences in philosophy related to accreditation goals and outcomes within many institutions, TEAC (Teacher Education Accreditation Council) split off in 1997 as an alternative. In 2013, the two accreditors agreed to re-merge into a new organization, CAEP (Council for the Accreditation of Educator Preparation). While there were multiple reasons for the consolidation, financial sustainability was a factor. Nonetheless, in 2017, yet another split occurred with the formation of AAQEP (Association for Advancing Quality in Educator Preparation) as an alternative to address the need to embrace greater flexibility in demonstrating program excellence rather than relying on prescriptive standards and requirements.

In business education, accreditation is divided between two major organizations: the Association to Advance Collegiate Schools of Business (AACSB) and the Accreditation Council for Business Schools and Programs (ACBSP). The difference between the two accreditors is related to the focus of the institutions in which the programs reside. AACSB, founded in 1916, is the accrediting organization favored by research-intensive business schools, whereas ACBSP, founded in 1988, is the organization of choice for institutions that are primarily focused on teaching.

Accreditation of nursing education is also now split between two organizations. The Accreditation Commission for Education in Nursing (ACEN) was established in 1938 and focuses on higher education for practical nursing skills at the associate and baccalaureate levels. The Commission on Collegiate Nursing Education (CCNE) was founded in 1996 by the American Association of Colleges of Nursing (AACN), focusing on baccalaureate, graduate, and post-graduate programs. CCNE was a founding member of the Health Professions Collaborative, a platform for problem solving and resource sharing among health professions, and plays an active role in quality assurance in nursing education globally.

5. What are the continuing challenges and risks for COA?

Ongoing challenges for COA include inadequate budget for the work to be performed by committee members. It has been estimated to take no less than 84 hours per year of meetings and individual review per member of COA for accreditation activities related to program review; most committee members receive little or no remuneration for these

hours of work or expenses. This does not include the extensive time provided gratis by external review panel members on program review, site visits, and documentation.

The budget is also inadequate to support the work performed by the Office of Accreditation (OA) staff of two, who are responsible for all work between the COA and ALA, COA and CHEA, and COA and the programs seeking initial accreditation and its renewal. The average staff size for similar ASPA accreditors⁴ is 9.8 FTE. The COA budget is less than half that of similar accreditors.

The ALA chief financial officer confirms that the OA is among the General Fund cost centers and as such, it operates at a deficit. The organization covers this deficit by allocation from organizational net assets. To become a neutral budget unit, OA would have to address its sources of revenue. If the Executive Board makes no governance changes to OA and COA, a new fee structure would need to be developed that would cover actual expenses associated with accreditation processes per program. Should governance structure change, then an early point of order by the new governing members should be a review of operating revenue. As noted earlier, many LIS programs are unable to support increased fees.

The AWG also found that as a committee, COA has been treated similarly to other ALA committees, requiring ALA Board approval for changes in policies, procedures, standards, and membership. This committee structure lies on the opposite end of the risk spectrum from CHEA guidelines in terms of independence. Although OA provides procedures to ensure independence in accreditation decision making, the current appointment process by the ALA president-elect creates potential for conflict of interest in the review process. Committee governance procedures in ALA also present barriers to timely response to CHEA requirements.

Finally, the makeup of COA membership has not kept pace with the changing nature of LIS professions, nor the diversity of LIS program offerings. Expanding the membership of COA to be more inclusive of diverse LIS professions and include representatives of other relevant professional associations would more closely reflect this evolution.

6. What solutions are recommended to mitigate these concerns?

Three potential solutions are presented to mitigate the fiscal and transparency concerns of the current accreditation governance structure. In this section, we present several recommendations to help the Executive Council envision how those solutions can be achieved.

⁴ ASPA accreditors with fewer than 75 programs not requiring licensure.

| SOLUTION | RECOMMENDATIONS |
|---|---|
| Least risk: Establish a separate, independent 501(c)3 corporation for the accrediting body, supported by a coalition of relevant professional associations (including ALA). | <p>Recommendation 1: establish separate 501(c)3</p> <p>Recommendation 2: expand COA membership</p> |
| Moderate risk: Establish a new organization within ALA with independent governance and membership procedures, supported by a coalition of relevant professional associations. | <p>Recommendation 2: expand COA membership</p> <p>Recommendation 3: create a more independent accreditation entity within ALA</p> |
| Most risk: Continue the current organization and governance. | Recommendation 4: rename COA as a commission or council |

Recommendation 1: Establish a separate 501(c)3 for accreditation

From a governance best practices perspective, the recommendations of the 2002 Task Force report remain valid and pose the least risk for maintaining CHEA recognition and fiscal sustainability: ALA should create a separate 501(c)3 to align more closely with CHEA's guidelines for the structure and relationship of an accrediting body to the parent organization. According to CHEA, the more separate an association's accrediting body from the parent organization, the less risk of the organization losing its ability to accredit LIS programs. Creating a separate 501(c)3 to oversee the accreditation process, with its own ability to appoint members, would create a definitive and transparent separation between the accrediting body and its parent organization.

Recommendation 2: Expand COA membership to increase diversity and ensure sustainability

The AWG recommends expanding the membership of COA to be more inclusive of diverse LIS professions, and to consider including representatives of other relevant professional organizations such as the Special Libraries Association, Medical Libraries Association, American Association of Law Libraries, Association of Information Science and Technology, Society of American Archivists, Canadian Library Association, and relevant others, as well as ALA.

The 2002 Task Force Report proposed a similar collaborative approach to expand the fiscal support base, reduce reliance on ALA funding, and stabilize program fees. At the time of its proposal, the 2002 Task Force had received letters of intent from the Executive Boards of SLA, AALL, MLA, ASIST, CLA, SAA, ALISE and ARMA. These commitments would need to be re-negotiated for the current proposal. The AWG refers the Board to the 2002 [External Accreditation Proposal](#) for details on the proposed new entity, how the accreditation process could function, how it would be funded, and other operational particulars.

Recommendation 3: Create a more independent accreditation entity within ALA.

The current accrediting agency for LIS programs is the ALA Committee on Accreditation (COA). As a committee, it has been treated similarly to other ALA committees and requires ALA Board approval for changes in policies, procedures, standards, and membership. Creating a Commission or Council on Accreditation indicates to ALA membership that the accreditation body is a distinct and separate entity from the ALA committee structure. Allowing this new Commission or Council the ability to set its own policies and procedures, membership selection and education standards further strengthens the work and the value of this entity. Having this Commission or Council be responsible for its own budget would place the financial burden on the accreditation agency to find sources of revenue to support its work such as the formation of a coalition of professional associations, which would decrease its financial dependence on ALA.

Recommendation 4: Rename COA as “Commission” or “Council”

If ALA does not want to invest the time and resources at this time the AWG recommends that ALA rename COA as either a commission or council and investigate a new appointment process for the members that provides for more independent decision making.

Respectfully submitted,

CoA/SCOE Accreditation Working Group

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