

Neoliberalism and the Myth of Higher Education Accreditation in the United States:  
A Case Study at George Mason University

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By

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## ABSTRACT

### NEOLIBERALISM AND THE MYTH OF HIGHER EDUCATION ACCREDITATION IN THE UNITED STATES: A CASE STUDY AT GEORGE MASON UNIVERSITY

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An examination of the historical development of institutions of higher education in the United States shows that there has been a clear increase in the perpetuation of neoliberal ideologies and practices. The ideology of neoliberalism has been core to the rise of the “myth” of accreditation, its ritual practices of assessment, and the influence of the federal and state government. Assessment practices serve to dominate the national narrative in defining higher education as a commodity, in a marketplace where cultural capital may be purchased. This research explores the methods by which George Mason University is able to fulfill accreditation requirements through assessment rituals. These practices, I argue, perpetuate the myth of accreditation to the disadvantage of the students and faculty of the university. By challenging the myth of accreditation, I argue that alternative paradigms can be developed for valuations of quality in institutions of higher education, one in which students and faculty are served, rather than external auditors.

## CHAPTER ONE: INTRODUCTION

### Research Problem

An examination of the historical development of institutions of higher education in the United States shows that there has been a clear increase in the perpetuation of neoliberal ideologies and practices within colleges and universities. On a national scale, neoliberal ideology first gained prominence in the 1980s, during which time it aimed to “restore state solvency and financial-systemic stability by bolstering and attracting the money of a burgeoning world financial market (through privatization, new inward investment, and investment market growth) and by attracting hard currency by pursuing exports and assuring monetary stability” (Centeno and Cohen, 2012:323). The ideology of neoliberalism has been core to the rise of the “myth” of accreditation, its ritual practices of assessment, and the influence of the federal and state government over these processes. The “myth” of accreditation, I propose, is the politicized process by which institutions become and remain accredited as a means to procure federal funding. Accreditation, then, serves as an indicator of the powerful ability of mythical beliefs to shape cultural practice.

Utilizing Centeno and Cohen’s (2012) analysis of neoliberalism as a particularly economic national ideology, this analysis explores the ways in which state and federal oversight of higher education accreditation has embraced this philosophy. As an ideology

“involved in the elimination of institutionalized post-Depression and post-World War II policy conventions, controls on international exchange, economic regulation, public goods and service provisions, and active fiscal and monetary policies”, the neoliberal shift toward improved financial stability and increased levels of scrutiny has characterized the processes by which accreditation is achieved in higher education (Centeno and Cohen, 2012:318).

In this work, I use “myth” in a conventional way to refer to a cultural story that is told and widely believed by those in the higher education community but whose terms are false, or, in this case, unproven. From this standpoint, the claims of accreditation are themselves tautological. That is, accreditation’s claim to ensuring good educational practice (or, moreover, institutional “effectiveness”) is situated within a neoliberal paradigm in which assessment measures (such as “student learning outcomes” and “institutional quality”) are claimed to result in a product, specifically quality educational practice defined as a market-ready graduate, the product of financial investment. While the definition of the myth (as above) is conventional, I employ a Levi-Strausseau analysis, in which rituals and activities related to the myth are relational in nature. Following Saussure’s (1959) analysis of linguistics in which the arbitrary characteristic of linguistic signs was a prerequisite for making the terms of such analysis scientific, Levi-Strauss argues that it is the “combination of sounds, not the sounds in themselves, which provides the significant data” (1955:429). In this work, I argue that the combination of certain activities associated with accreditation are not meaningful in their disparate parts, but rather provide data to be analyzed within the structure of the myth.

This data, in turn, is used to support the system of accreditation, both externally through accrediting agencies, and internally through the institution of practices that are in line with the expectations of those agencies. I argue that the story that accreditation produces better student learning is a myth, rather, the product of accreditation is access to federal and state funding and a place in the neoliberal marketplace of the national economy.

The discrepancy between the official goals of accreditation and its actual effects is an important issue surrounding the growing influence of neoliberalism in higher education in the United States. Briefly, accrediting agencies aim to serve institutions of higher education by providing evaluations of quality through a voluntary peer-review process. As pressure from the federal government increases, demanding more effective, efficient, (and financial) measures of quality, institutions of higher education must grapple with increasingly complex political and cultural changes, appealing to neoliberal policies while remaining true to their own institutional mission. By examining the accreditation requirements of a regional accreditation agency and the methods by which George Mason University achieves these standards, this research seeks to employ an anthropological analysis in understanding the cultural narratives that structure both accreditation standards and the ways in which the institution is able to achieve them.

The mission statements and official documents of such accrediting agencies reveal narratives of a state-mandated policing authority; for instance, the Southern Association of Colleges and Schools Commission on Colleges claims to “improve the effectiveness of institutions by ensuring that institutions meet standards established by the higher education community that address the needs of society and students” (Mission

Statement of the Commission). The “higher education community”, in this case, includes accrediting agencies, institutions of higher education, and the political forces of Congress and the US Department of Education. These claims of improvement and service, I argue, are veiled by a seemingly insincere goal of educational quality and student learning; whereas, claiming to validate “educational quality”, the accreditation criteria produced by such agencies often fails to substantially address the very educational quality it claims to measure. The implications of this federally-driven arrangement must be understood in terms of its cultural and political ideology, especially as it competes with the aims of the administrators, educators, and students at George Mason University. My goal is to highlight the disjuncture between federal expectations of educational quality and that of accreditation expectations of institutional quality. The structures in place to guide accreditation processes serve to situate neoliberal ideology within the institution along with a convincing myth of the value of these mechanisms.

This research will be of greatest significance to the educators, administrators, and students of George Mason University, and those involved in accreditation and assessment. The following exploration of the cultural impact of accreditation at George Mason University will contribute to the existing literature on post-modern higher education, but may also provide a useful analysis from which policy-makers may view the impacts of the larger political discourse on the campus of George Mason University. Carefully situating the analysis and results of this research within the cultural factors of both the university and the accrediting agencies results in a meaningful analysis that can

benefit those interested in the future of higher education, and the relationship between accreditation as a state power and the autonomy of individual institutions.

### Research Methods

The analysis of the issues outlined above, this research is based primarily on official documents made available by relevant accreditation agencies and GMU. Most important is the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), the agency that accredits GMU. SACSCOC enforces an array of accreditation standards, regulations, and practices, including accreditation documentation and guidelines. The US Department of Education is an important source of documentation as it pertains to the official national narrative, including laws and policies that demonstrate its oversight of higher education accreditation practices in the United States.

George Mason University's Office of Institutional Assessment is responsible for all accreditation activities at the university. This office makes available documentation of the university's accreditation status, accreditation documentation, as well as official institutional guidelines for both academic and administrative achievement in all areas of assessment for accreditation. This documentation is of critical importance to this research as it documents the official practices of the university in fulfilling accreditation standards. The distinction between the federal aims for accreditation and the requirements actually established by the accrediting agency will be of significance in evaluating the actual implications of accreditation in practice at GMU.

By framing the prescriptive narrative of the regional accreditation agencies within the larger narrative outlined by the US Department of Education, this research will demonstrate the neoliberal ideology I argue is perpetuated in these practices. The accreditation documentation at George Mason University further illuminates how these policies are implemented and their effects on the campus community. I note that interviews of relevant personnel on and off campus are an important element in future research, but were outside the purview of the current study.

## CHAPTER TWO: LITERATURE REVIEW

### Higher Education in the United States

The history of higher education in the United States is important to understanding the impacts of accreditation practices, especially here as represented in neoliberal ideas and practice. Recent national cultural shifts toward economism have resulted in major implications for colleges and universities. Historically, institutions dating back to the early 1100s were founded primarily as schools of theology and religious doctrine - a model that enjoyed prominence well until the late 17<sup>th</sup> century when the University of Halle in Germany “departed from the medieval idea that higher education must be understood within the context of the Christian religion and introduced the idea of the university as a secular entity, existing to serve the state” (Ford 2002:27). This model of higher education led to the formation of research-based scientific disciplines, “more rigidly patterned, technically-applied...laboratory-based science courses” (Ainley 1998:145). According to Ford, the model of the university as an entity “existing to serve the state” is the “defining characteristic of the modern university” (2002:27).

In the United States, Ford identifies the shift from religious authority to state authority in higher education as concurrent with the post-World War II shift from Christianity to nationalism, where an emphasis on ‘practical education’ became the dominant, state-funded, higher education apparatus in the United States (2002:30). The

idea that college and university graduates should be useful to the state was not a new idea in the sense of their role in society, but rather in the substance of their societal contribution. Where graduates from pre-industrial European universities were viewed as undisputed sources of knowledge in their society, contributing to both the intellectual and spiritual growth of their communities, graduates of the German model of higher education were expected to earn degrees in a particular field of science or math that would enable them to contribute to state leadership in a particularly political (rather than religious or social) capacity. This model stimulated the development of the modern research university, which prioritizes independent discipline-based research rather than a broad curriculum in the arts and sciences.

Following the rise of nationalism in the United States, Ford (2002) identifies a Western shift toward *economism*: essentially, a culture that is shaped primarily by economic priorities. Describing nationalism as a direct result of both World Wars, he posits that the shift from nationalism to economism was a natural and welcome change in the United States. Further, “the several decades preceding the end of World War II witnessed an increasing tendency to identify the national interest with economic growth” (Ford 2002:31). This focus on economic growth directly impacted the shape and definition of higher education in the Western world.

Ford argues, “a society organized around the idea of economism will require a new kind of university, one very similar to the [for-profit] University of Phoenix” (2002:32). Indeed, the increasing diversification of the traditional student body demanded a subsequent shift in the higher education landscape, as institutions sought to

accommodate the needs of career-minded students (Gaston, 2013: 52). As an educational model focused primarily on profits and job placement, Robert Nathan describes this scenario as ‘industry-driven’ in which educational programs become attractive to prospective students because they require less time and effort to earn an academic credential and provide guaranteed employment upon degree completion (2013:113).

In the twenty-first century, higher education in the United States has been broadly classified as a ‘knowledge industry’ that “represents about 3 percent of the gross national product” (Thelin 2002:1034). As the number of colleges and universities continue to increase, higher education continues to grow as a social, economic, and cultural mechanism. While curriculum and educational standards were first established by religious cultural ideals, and later by state directives, “today there is an increasing tendency to let the market decide what it is that students need to know” (Ford 2002:34).

In a scathing objection to the industry-driven model of higher education in the United States, Paul Geisler remarks that in “today’s ‘student as customer,’ teacher as ‘worker’ culture, the corporate university is more than happy to oblige the student seeking a technocratic and neoliberalist based ‘higher education’” (2006:234). Higher education, then, has become something that is increasingly criticized – for what is meant by the classification ‘higher’ or ‘post-secondary’ education is rather questionable when the substance of the institutions themselves are largely critiqued for diminished educational values in favor of national economic interests.

Despite the critiques of the modern economic model of higher education, which arise primarily from professors in these institutions (Ford 2002, Thelin 2002, Geisler

2006), Patrick Ainley suggests that “with the collapse of traditional class divisions, the state in Western societies has stepped in to maintain them...based upon what Bourdieu (1979) called cultural rather than material capital” (1998:153). Higher education, then, despite its various structures throughout history, may have retained an ultimate ideal as the bearer of ‘cultural capital’. Whether that capital is used for religious, state, economic, individual, or global purposes has changed, and will continue to change, over time. As an institution of cultural capital, the modern college or university of higher education is responsible for “the development of the individual, subjective self and the associated responsibility to society that higher education possesses” (Geisler 2006:234). Further, it is also important to recognize the modern university as a site of class divisions, whereby higher education has become associated with job security (of lack thereof) for its graduates.

Similarly, in opposition to the ‘industry-driven’ college or university, there is an alternative of a ‘society-driven’ institution, which may be the higher education ideal of the future, as the world moves toward global models that seek to supersede economism. “A society-driven higher education system aims to build a well-balanced person...that make[s] one into a good employee in the workplace and a good citizen in the community” (Nathan 2013:113). With the continued changes in higher education, finding an accurate definition of these institutions will persist as a challenge rather than an answer. The question of production is at the core of these developments: what does higher education seek to produce in its graduates?

Jane Robbins describes higher education through her definition of the university, stating that: “one way of conceptualizing the university is as a set of nested institutions: a group of interdependent yet unlinked citizen-cultures and organizations occupying a larger society that is a kind of university-state, and over which an administrative superstructure governs” (2008:254). Ultimately, however, a definitive definition of higher education will remain elusive, not to the discontent of scholars, however, for the fluidity of social institutions such as higher education enables constant adaptation and change that will likely guarantee its survival. Higher education, as it persists in the modern Western world, may be best characterized by Ford’s temporal definition:

Rather than being a fixed institution, the university is a historical artifact always under social construction. Its present form is not its only form, and the fact that it has changed so dramatically in the past suggests that it may do so again in the future. [2002:36]

### Higher Education and Accreditation

Accreditation processes in the United States have been routinely celebrated for its prominent focus on voluntary participation and peer-review processes. As institutions voluntarily seek to become accredited, regional accreditors employ a peer-review system in which representatives from peer institutions assist in the evaluation of their neighbors. “Self-regulation through accreditation embodies a traditional U.S. philosophy that a free people can and ought to govern themselves through a representative, flexible, and responsive system. Accordingly, accreditation is best accomplished through a voluntary association of educational institutions” (Southern Association of Colleges and Schools Commission on Colleges, 2012:2). Despite the claims of voluntary participation, the

evidence discussed in later chapters demonstrates the visibly coerced nature of accreditation processes.

Until the 1950s, institutions of higher education operated largely outside of the influence and control of the federal government. After the passing of the GI Bill, the federal government increased its role in recognizing accredited institutions where Korean War veterans, and others, might receive an education (Hall, 2012:236). The Higher Education Act of 1965 signed into law by President Lyndon Johnson is the primary legislation that determines how federal funds are awarded to students and institutions, among other rulings. “It is the major law that governs federal student aid, and in its initial inception, it increased federal money to universities, created scholarships, and provided low-interest loans for students. It currently spans a wide range of topics, from loan limits to accreditation” (Breuder, 2014:1).

With the prospect of federal funding for institutions of higher education and their students, it became of paramount importance for institutions to achieve accreditation through a federally recognized accrediting agency. At the turn of the 21<sup>st</sup> century, new accreditation standards were formed, emphasizing two paramount items that define accreditation as we know it today: student learning outcomes and assessment. The requirement to produce evidence of student learning “has led to new documentation streams, including written learning outcomes, assessment plans, reports on results and improvement plans” (Becher, 2013: 573). These new sources of documentation readily aim to serve the purposes of accreditation, which is ultimately driven by the prospect of federal funding.

As the relationship between the federal government and institutions of higher education continues to develop, Matthews pointedly remarks, “the changes to federal regulations over higher education accreditation between 1992 and 2008 are slowly amalgamating into a national system of standardization for higher education that is wielded by the Secretary of Education via the system for recognizing accrediting organizations” (2012:118). This standardization may be seen in the normalization of assessment expectations to include all aspects of an institution, including those unrelated to education. In another element of standardization, Becher (2013) reiterates the idea that a standardized assessment vocabulary is needed in order for all the units of an institution of higher education to benefit from assessment. Assessment vocabulary will be discussed more in-depth later in this analysis.

The sustained and ongoing changes to the state of higher education, as a result of accreditation activities and the implementation of assessment demands, continues to move toward increased federal influence, albeit moderated through the accrediting agencies themselves. Matthews identifies this trend as the “nationalization” of higher education which refers to “(1) the growth of the requirements in federal statute that accreditors must meet as a condition of recognition by the Secretary of Education and (2) the intent that these requirements be carried out in the review process for accredited institutions at every level within the U.S. higher education system” (2012:131).

Moving forward from this brief introduction of the history and trajectory of the quintessential American university, it is important to consider the impact of neoliberal ideology on these changes. Since the mid-1980s, neoliberalism has enjoyed a sweeping

domination of economic culture in the United States. Characterized by “aggregate growth, stable prices, productivity, and efficiency enhancements, as well as the protection of private property over distributional equality, guarantees of personal income or access to essential goods and services, leisure (or nonwork) time, and environmental sustainability” neoliberalism is the ideological by-product of a market-driven economy with special attention devoted to individual desires (Centeno & Cohen, 2012:328). Neoliberalism has grown to imbue daily life with the “language and logic of market exchange”; Centeno and Cohen highlight the cultural landscape of this ideology in the United States and other Western countries:

The sanctity of individual choice was elevated to the highest priority; cost-benefit analysis could provide guidelines for behavior; and inequalities were justified, functional, and inevitable. Political appeals based on collective identities, shared sacrifice, and basic rights were deemed naïve at best and dangerously totalitarian at worst. The broader culture of the market convinced many that the potential rewards were worth the insecurity [2012:331].

David Harvey addresses the widespread effects of neoliberalism through what he calls, “the commodification of everything” (2005:165). Harvey’s premise for the commodification of everything postulates “the existence of property rights over processes, things, and social relations, that a price can be put on them, and that they can be traded subject to legal contract [such that] the market is presumed to work as an appropriate guide – ethic – for all human action” (Harvey, 2005:165). This is an important statement because of the association of the market as the driving force “for all human action.” This is a trend that is readily observed in higher education in terms of the

actions taking place to successfully “commodify” formerly immeasurable things such as learning, education, and teaching.

The shift towards commodification has caused a dramatic change in the labor force in terms of security, expectations, and resources. The idea that employees are expected to produce more with fewer resources is a trend not unrelated to neoliberalism, as increased efficiencies often supersede quality. In the workplace, a “‘personal responsibility system’ is substituted for social protections,” and in the university, “security of tenure becomes a thing of the past” (Harvey, 2005:168). In this climate then, Harvey argues that individuals have been traded products in place of securities such as pensions, health care, and tenure; further, these products are a “matter of individual choice tied to the affordability of financial products embedded in risky financial markets” (Harvey, 2005:168).

As argued here, neoliberal ideology has permeated nearly every facet of Western society; its impact on higher education has resulted in a transformation of those institutions from spaces of learning to marketplaces for financial investments and monetary transactions. Below, I describe a brief example of the impact of neoliberalism and its political agenda for higher education.

#### Neoliberalism and Higher Education

Former Harvard University president Derek Bok outlines what he believes to be the correct and ‘natural’ reactions that should occur in light of current financial challenges faced by institutions of higher education (as a result of decreased public funding). While Bok’s experience in higher education is not to be disputed, his ideas

most certainly should be. In *Higher Education in America* (2013), Bok firmly places the responsibility of institutional change on the shoulders of the faculty, claiming that persuasion is the key to institutional transformation.

Bok suggests that “once [the faculty] are persuaded by credible evidence that the way they are teaching or the curriculum they have been using is not actually accomplishing what they thought it was achieving, they will usually try to change their methods without much prodding from outside” (Bok 2013:202). This reasoning, of course, presumes that, in some cases, faculty are not actually teaching or that students are not learning what is expected. It also presumes that faculty are expected to modify teaching to align with the overall goals of the institution, to include its mission, economic interests, and other endeavors which are often determined by the administration of the institution. An interesting component to this argument is that it also presumes that faculty are expected to teach to external societal standards. This proposition is highly questionable and can be seen as an infringement on academic freedom.

From this premise, Bok moves forward with proposals for institutional reform stemming from the as-argued latent power possessed by the faculty. He claims that ‘confrontation’ with assessment data will spur faculty members to seek improvement in their methods of teaching. Bok fails to address who, exactly, is responsible for producing such data and does not identify where, specifically, the need for improvement lies. He states, “Getting professors to recognize that a conflict exists between their current educational methods and their deeper commitment to help their students learn is the most effective stimulus to reform” (Bok 2013:203). This claim is highly questionable,

especially considering the idea that assessment data might reveal such conflict. Further, and perhaps most importantly, Bok provides no evidence to suggest that professors are failing to achieve “their deeper commitment to help their students learn”. The difference is in what the individual faculty member may desire to teach as it contests with what the institution, the federal government, and the market wants the faculty to teach.

Bok states that the need for improvement is linked to the understanding of “how well or badly the current [academic] program is achieving its intended objectives” and that the absence of changes in the college curriculum can be attributed to a “lack of any strong pressure to change” (2013:209-10). One might assume that the “intended objectives” of an academic program might be related to the academic content of the course. Bok suggests otherwise, especially “since CEOs have expressed a desire for graduates with a greater understanding of [business] subjects” (2013:209). He makes it rapidly apparent that the improvement he seeks for higher education is essentially tied to neoliberal policies and market influences – goals largely devoid of the learning-centered objectives of academia. Describing it as a method of “intuitive appeal,” Bok even identifies with the idea proposed by the Commission on the Future of Higher Education to explore “the possibility of mobilizing market pressure to produce [institutional] change” (2013:211).

Expressing the need for higher education reform, Bok classifies any such reform as a response to calls from “federal and state officials” desiring “more accountability” and a demonstration of “what citizens are getting in return for all the money contributed to colleges in tuitions and taxes” (2013:210). Not only are these demands glaringly

influenced by a consumer culture, these types of neoliberal expectations are experiencing increasing pressure from the market. For instance, Bok discusses the method of “performance budgeting” as a means to spur academic improvement where “budget allocations might reflect...the success of recent graduates in finding jobs, or how much improvement colleges could demonstrate in raising scores on measures such as the GRE” (2013:210). Such “measures” are clearly tied to the national economy, including aims such as cost-benefit analysis, and are not inherent to the goals of higher education.

Veiled in the guise of desiring improved learning for students, Bok’s review of higher education reform highlights the most neoliberal, market-driven, academically-starved forces for change. Bok’s troubling suggestions fully disregard the aptitude and agency of faculty members and instructors, and reduces their work to that of training market consumers. Reforming higher education at the expense of pedagogical foundations and genuine learning is a detrimental risk that should be sorely received by educators and students alike. Further, as policy-makers are largely responsible for the dramatic funding cuts to public colleges and universities, it is baseless to suggest that they are concerned primarily with integrity in spending taxpayers dollars; rather, these political actions demonstrate that the financial cost of higher education has become a private responsibility steeped in economic preservation rather than a public social priority.

In opposition to the neoliberal assumptions reiterated by Bok, university professor Paul Geisler (2006) criticizes the forces of accreditation for imposing a dysfunctional and “dysacademic” curriculum on universities. Geisler’s powerful analysis of the effects of

accreditation practices in higher education provides a scathing rebuke to the practices that take place in the accreditation process. Identifying the well-intended ideology of accreditation – to protect universities from governmental and political control and to promote self-governed educational quality – Geisler reviews a myriad of ways in which accreditation has taken a fundamental turn for the worse. By essentially stripping institutions of their pedagogical, educational, and ideological agency and instilling a structural system of federally-mandated oversight, accreditation standards “can effectively survey and control their subjects by determining normal, standardized, and acceptable modes of behavior, knowledge and even subjective identity” (2006:115).

Interestingly, a review of the purposes of accreditation published by the Council for Higher Education Accreditation (CHEA) reveals problematic conflicts, where, for example, despite accreditation being classified as a ‘voluntary’ process, “access to Federal funds as the accreditation of institutions and programs is required in order for students to gain access to federal funds” (Geisler 2006:114). Tying federal funds to accreditation poses a glaring contradiction of the intent to protect academic freedom, faculty agency, and self-governance. Further, Geisler posits, “the particular viewpoints, experiences, knowledges, and philosophical inclinations that each highly trained and expert faculty member brings to the process are largely decentered and marginalized by the authority that is accreditation” (2006:116).

Geisler’s notion of “dysacademia” explores the idea that a “hidden curriculum” is at work in a larger sense throughout the accreditation processes and structures. This hidden curriculum refers to the goal of teaching students how to “do” rather than how to

“be” (an important cultural distinction); especially where Geisler believes that “a very powerful and meaningful peculiarity exists between ‘doing’ and ‘being’” (2006:117). He states that repeated subjection to the processes of accreditation eventually results in “self-surveillance” where the external force is no longer needed but is rather ingrained and made natural. “The objects of such a discourse are held hostage and prevented from seeing, experiencing, or reaching any sort of meaningful and distinctive self-appropriation, thus becoming objects of accreditation’s discursive formula” (2006:117).

In summarizing the widespread effects of accreditation, Geisler is careful to classify accreditation as a “socially constructed system wrought with political interference and hegemonic discourses” (2006:123). He accuses accreditation of being shortsighted in its goals and arrogant for assuming the ability to standardize the knowledge and skills associated with certain professions. The neoliberal premise that education serves only to prepare individuals for the workforce is seen in its proliferation throughout the accreditation process.

Further, neoliberal ideology can be argued as directly related to contemporary university practice, including, for example, the rise in tuition in most colleges and universities that result from a reduction in funding and resources. This action results in a societal call to produce documentation that can demonstrate, or advertise, the “product” (read: degree) one may “purchase” from any given college or university. Such extreme forms of commodification in colleges and universities have shifted dramatically in line with the market expectations of neoliberalism. In response to these events, an increase in

education and reduction in oversight may be the solution to combating the market practices that currently dominate the ‘cultural capital’ of higher education.

### Anthropology and Higher Education

Sara Delamont (2012) has criticized anthropologists of producing anthropologies of education that are geared only for a “narrowly focused community” (52). In light of both the shortcomings and in some cases complete absence of the anthropology of education in relevant venues, her suggestions regarding theoretical framework are particularly helpful. Delamont laments two primary areas in which work in the discipline is lacking: “first, the anthropology of education is not, generally, deploying the analytic concepts at the frontiers of social and cultural anthropology; and second, it is not using anthropology to make education unfamiliar” (2012:57). Both are serious accusations, and both are equally compelling to make improvements in the anthropology of education. She chides the subdiscipline for “routinely [deploying] the concept of culture clash” and for failing to “engage with the same conceptual repertoire as the wider discipline” (2012:58).

In light of Delamont’s suggestions, Matthew Hull’s discussion of the study of bureaucratic processes through the analysis of documents is especially pertinent to this research in terms of the exceedingly bureaucratic processes and documentation associated with accreditation in higher education. Despite their being often overlooked by anthropologists, Hull argues that bureaucratic documents “are the main mechanism and dominant emblem of the formal dimension of bureaucracy” (2012:252). Keeping in mind that documents themselves are mediators of particular practices, they must be understood in “the efficacy of bureaucratic texts due to their capacity to represent, to stand for

something else” (2012:253). This mediation provides a rich position from which anthropologists can draw important information that refines our understanding of these types of documents and the processes they record.

Hull (2012) argues that coordination and control is a large function and result of bureaucratic documents. Drawing on Weber’s (1978) work, Hull highlights the ability of bureaucratic documents to achieve “domination through knowledge” by means of relentless documentation, recording, and accountability that is characteristic of the accreditation process. Further, this type of documentation reveals much about bureaucratic institutions because of the many types of documents and writings that relate to the different capacities and roles of those within the organization. As an example of the function of documents within institutions, Hull paraphrases Bosk (2007) stating: “within contemporary institutional review board processes, relations with documents divide faculty who deliberate on protocols from functionaries who document that work” (2012:257). In this way, documentation becomes a separate task alongside the regular functions of the institution.

At the same time, researchers must be careful not to draw too decisive a conclusion based on bureaucratic documents, as set out above, for “the sheer volume of required documents may practically transform documentary regulations into sources of official ignorance” (Hull 2012:258). This becomes especially true in cases where bureaucratic documents “compete” with one another - resulting in confusion as to the interpretation, and ultimately, ignorance of the official (or original) intent of the documents. An important point to consider in these instances may be that “bureaucracies

also exercise their control through the uncertainty, ambiguity, and fear created by leaving people and things undocumented” (Hull 2012:258). While I argue that this is not commonly the case in accreditation processes in higher education (given that those processes require an overwhelming amount of documentation) it remains important to recognize those activities which may be left undocumented as indications of information that is unneeded or unnecessary in meeting accreditation requirements.

An interesting dynamic is identified in the mixed feelings toward bureaucratic documents since: “disadvantaged petty traders and service people sometimes oppose the legal discourse that prohibits their activities even as they embrace the documents it generates” (Hull 2012:258). This scenario is particularly interesting to this research, primarily because of the cost-benefit duality of accreditation processes. That is, at what cost do students and faculty benefit from outcomes of accreditation? Hull cites Bowker (2005) arguing that the “question is not what the state ‘knows’ about a particular individual [or institution], say, but what it can *should the need ever arise*” (2012:261). This sentiment is particularly salient in terms of the requirements for accreditation, where the evidence may be rarely evaluated in its specific parts - but for the sake of validation and defense, the documentation is recorded and made available, should the need arise. Further study is appropriate in terms of the complex data repositories and management systems required for accreditation documentation as well.

Investigating the changing demands placed on higher education in Britain, Cris Shore and Susan Wright draw attention to the difference between intention and practice in educational institutions (1999). In opposition to the supposed benefits of structural

reform made in the name of accountability and quality assurance, they state, “in Britain at least, accountability is not always as democratic or empowering as it appears” (Shore and Wright 1999:557). Rather they argue that the proposed model of accountability has become distorted and “particularly coercive and disabling” (1999:557).

Shore and Wright cite three reasons for the harmful nature of accreditation processes in higher education: “first, because accountability is elided with policing...second, because it reduces professional relations to crude, quantifiable, and, above all, ‘inspectable’ templates...and third, because it is introducing disciplinary mechanisms that mark a new form of neo-liberal governmentality” (1999:557). Further, they engage in a brief kind of keyword analysis of the term *audit*. Recalling its most basic definition, Shore and Wright classify the word *audit* as a term generally associated with finance, judgment, and scrutiny by some official power. The official power exercising these tasks is of significance to higher education, especially in terms of the “*relationship of power* between scrutinizer and observed” (Shore and Wright, 1999:558.) In terms of accreditation, the accrediting agency holds the power of federal funding (among other things) over the individual institution seeking accreditation; thus the power structure between the parties involved in accreditation is of significant importance in this analysis.

Tracing the “audit explosion” through Britain, Shore and Wright (1999) demonstrate the rise of an audit culture as occurring all at once, permeating the most professional occupations and thereby changing professional expectations of power and subjectivity. Essentially, in Britain, industries subscribed to a free market ideal in which self-governance was celebrated; however, as issues of fraud, deception, and malpractice

led to the demise of many corporations and industries, a new trend ensued where official audit culture was deemed necessary to regulate industry in a free market economy. The imposition of these practices in higher education served to carry over financial, neoliberal, and economical ideologies into the regulation of higher education.

With the implementation of audit culture into higher education, Shore and Wright observe that “the means for realizing these [assessment] objectives were new disciplinary norms, institutional procedures and bureaucratic agents which together precipitated a radical change in academics’ own sense of themselves as professionals” (1999:563). By incorporating higher education into the fiscal expectations of modern industry, audit culture became a regulating tool by which to produce ‘market ready’ graduates, all the while using fewer resources. Despite claims for increased quality and more efficient management, Shore and Wright note, “the result [for faculty] is not power without responsibility, but responsibility without power” (1999:564).

Shore and Wright propose three methods by which anthropologists should respond to the rise in audit culture. First, they suggest that a great danger lies in audit culture becoming the norm – where it remains unchallenged and widely accepted. By challenging these policies and procedures, academics may be able to elicit change. This idea concurs with Delamont’s (2012) argument that anthropologists have a duty to respond to this issue largely because, as members of the academic community, anthropologists are stakeholders in the future of higher education. Their second suggestion is to “develop a dialogue within anthropology about what we mean by [audit] keywords” (Shore & Wright 1999:571). By allowing audit culture demands to define

higher education, institutions risk losing governing autonomy. Third, Shore and Wright suggest “[learning] from the people anthropologists study” (1999:571). In understanding the political and governmental actors at work in the social complex of accreditation, anthropologists have a unique capacity to elicit greater understanding in these complex situations.

## CHAPTER THREE: THEORETICAL FRAMEWORK

### Structuralism and Mythical Realities

French anthropologist Claude Lévi-Strauss suggested that all cultures could be explained and understood by examining the structures which govern society. His theory of structuralism required that all parts of a culture be examined in their relationships to one another in order to establish meaning for each of the respective parts. Similar to Saussure's (1916) research in linguistics, Lévi-Strauss argues "the dialectic of superstructures, like that of language, consists in setting up *constitutive units*...so as to be able by means of them to elaborate a system which plays the part of a synthesizing operator between ideas and facts, thereby turning the latter into *signs*" (1966:131). Lévi-Strauss articulated his theory of structuralism most eloquently through the analysis of myths, which here will be applied to the process by which accreditation occurs in higher education in the United States.

The process of accreditation in higher education in the United States is appropriately identified within the structural category of myth, albeit a contemporary one, primarily because it functions to explain a cultural belief under the authority of an audit society, whereby it "impart[s] social knowledge in symbolic form" (Parkin, 2005:212). Lévi-Strauss suggests "the characteristic feature of mythical thought is that it expresses itself by means of a heterogeneous repertoire which, even if extensive, is nevertheless

limited. It has to use this repertoire, however, whatever the task in hand because it has nothing else at its disposal” (1966:17). Indeed, the path to federal funding for institutions of higher education is limited, consisting primarily of the components of the accreditation process itself.

In transmitting social knowledge, then, members of the society must understand the symbols of the myth and, subsequently, must also work to decode, or interpret, the symbols to reach an understanding of the ‘message’, that is, federal and state oversight are communicated to institutions of higher education through the accreditation process. In structural terms, accreditation has become associated with federal funding, and assessment, as a “resolution”, is a product of the relationship between the federal government and the university, one that has become synonymous with educational quality.

Leach summarized Lévi-Strauss’ analysis of myth in three basic operations:

(a) We start with a mythical story which is linear in form, one thing happening after another. The events occur in sequence, that is they form a ‘syntagmatic chain’, they are linked by metonymy.

(b) The analyst then notes that the story as a whole can be broken up into episodes A, B, C.

(c) Each of the episodes is then assumed to be a partial transformation of each of the others. So we rearrange the diagram to suggest that each of the sub-plots refers to simultaneous events, and ‘add up’ the result [1976:26].

Taking the process of accreditation in the United States as a mythical story, such that it is not natural or inherent to human behavior but is rather used to validate a cultural belief, this analysis becomes particularly useful in determining the cultural meaning (and value)

of the ‘myth’. Beginning with the first point of Leach’s framework, one can easily observe the sequential ‘story’ which is built by the process of accreditation. From the federal government to the individual students enrolled at accredited universities, there is a clear sequence of events which dictates the transmission of funding, knowledge, power, control, and expectation. This sequence is the ‘syntagmatic chain’, also described by Saussure as a *diachronic* event, meaning that it occurs over time and space (1916:99); Leach likened the diachronic event to a score played by an orchestra, as the resulting melody that can be heard when the separate notes are performed in sequence (1976:15).

The ‘story’ (or melody) can then be dissected into its respective parts, its *synchronic* parts, those which occur during a particular moment or place in time or space (Saussure, 1916: 99). The separate episodes of the myth are described by Leach as the moments of harmony within a melody, where several notes may be played simultaneously to create a harmony, but do not create a recognizable melody (1976:15). The synchronic events occur when multiple actions often occur simultaneously within the constituent events of the myth. For instance, a major element of the myth – assessment – is a complex web of parts that occur over space and time, but are represented as only one portion of the whole. While the synchronic parts are not entire representations of the totality of the myth, they are transformations of each of the other parts, operating within the framework of the story. This distinction is important in examining the process of accreditation, where each episode may consist of many parts, symbols, signs, and exchanges; these individual parts must be understood in relation to the ‘melody’ that is the entire mechanism of accreditation of higher education in the United States.

To begin the exercise, here I will disassemble the ‘myth’ into its respective (albeit simplified) parts, using the format provided by Leach (1976:26):

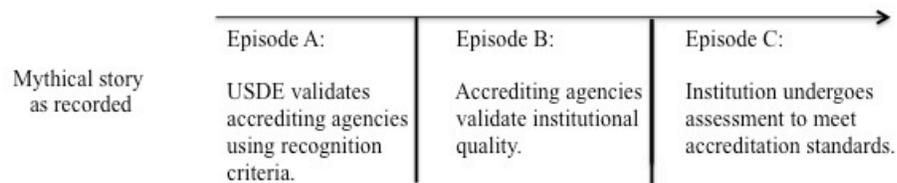


Fig. 1 Synchronic Elements of the Myth of Accreditation

Here, the major components of the accreditation process are arranged in sequence, illustrating the linear progression that must occur, which gives the myth meaning and cultural significance. These are the *synchronic* elements, which, when enacted together in sequence, creates the resulting *diachronic* event.

To determine the diachronic result of the mythical sequence, Leach states “each of the episodes is then assumed to be a partial transformation of each of the others. So we rearrange the diagram to suggest that each of the sub-plots refers to simultaneous events, and ‘add up’ the result” (1976:26). Here, by rearranging the synchronic elements, we can obtain the resulting product of the myth:

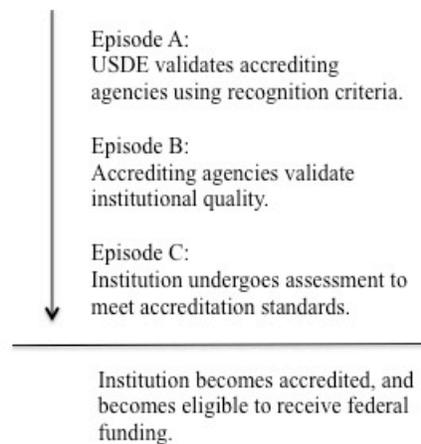


Fig. 2 Diachronic Summation of the Myth of Accreditation

The usefulness of this exercise is that it helps to establish the structure that shapes the resulting activities and processes by which accreditation is achieved. Each of the synchronic pieces of the myth is filled with particular signs and symbols which operate to communicate the meaning of the myth throughout the culture. Because of these signs and symbols, the myth is learned and interpreted as natural, or inherent to societal systems, despite the fact that the signs and symbols themselves are arbitrary.

### Signs, Symbols, and Signals

Edmund Leach suggests that human behavior, as observed in culture, can be distinguished in three distinct aspects: natural biological activities, technical actions, and expressive actions (1976:9). For the purposes of this research, I focus primarily on the latter two of these aspects, technical actions and expressive actions. Leach defines a technical action as “those which serve to alter the physical state of the world out there” while an expressive action is to “simply say something about the state of the world as it is” (1976:9). When applying this approach to accreditation in higher education, it

becomes apparent that one goal of education, to teach and learn, is certainly a technical action, resulting in the changed knowledge (and/or cultural behavior) of those doing the teaching and learning. Assessment, also, operates as a technical action by which students, faculty, and staff are impacted through the obligations to produce specific targeted outcomes on behalf of the institution and for the satisfaction of external auditors.

Accreditation, the primary result and goal of assessment, falls into the category of expressive action, where the resulting narrative serves to convey the current “state” of the institution. The achievement of accreditation conveys the cultural message of institutional soundness, educational quality, and overall reliability. As an expressive action, accreditation may convey many meanings, including eligibility of federal and state funding, the viability of a beneficial financial investment for consumers, and the guarantee of a worthwhile degree for students. How this result is achieved is the product of the social myth.

How does accreditation come to represent quality in higher education? One might argue that there is no inherent link between the methodological documentation of institutional data and subsequent improvement in educational quality of the institution. Leach argues that “our internal perception of the world around us is greatly influenced by the verbal categories which we use to describe it” (1976:33). In this way, it becomes useful to understand terms such as “student learning”, “assessment”, and “accreditation” as operative signs and symbols used to give meaning to these elements within higher education.

Three major communicative elements characterize speech and action: symbols, signs, and signals (Leach, 1976). A *symbol* may operate as a metaphor “to distinguish one class of things or actions from another” resulting in the creation of a boundary (Leach, 1976:33). For instance, federal funding may operate as a symbol in that it distinguishes accredited from non-accredited institutions of higher education, creating the boundary between institutions of verified educational quality and those ambiguous unverified institutions. An important argument regarding symbols is that “all boundaries [created by symbols] are *artificial* interruptions to what is naturally continuous, and that the ambiguity, which is implicit in the boundary as such, is a source of anxiety, applies to time as well as to space” (Leach, 1976:34). Applying this argument to the situation of the function of federal funding in higher education means that it serves to create a boundary between those institutions which are accredited and those which are not (or not yet) accredited, creating an “artificial interruption” between the “naturally continuous” state of institutions of higher education in the United States. The cultural meaning assigned to accreditation (and federal funding) therefore serves to divide institutions which would not otherwise be inherently different.

A *sign* is a word (or image) which stands for something else; for instance, accreditation stands for institutional quality, where the provision or action of being accredited is a sign of institutional quality (Leach, 1976). Similarly, assessment is a sign for student learning, as it is often associated with improving student learning outcomes. Remembering that all signs are arbitrary, it is important to indicate here that there is nothing inherent about assessment (technical action) which yields student learning

improvement (expressive action), rather, those in the higher education community, the field of accreditation, and the federal government have imposed the cultural association of assessment with student learning. (The argument remains that student learning occurs regardless of whether assessment is being conducted; a survey of the psychology of learning would certainly reveal the depth and range of scenarios where learning takes place, especially outside of the cultural norm such as in higher education. The implications of such a study might contest the ideas that accreditation should be associated with funding and other benefits.)

Lastly, a *signal*, Leach notes, is a dynamic communication tool by which an action is solicited as a result of its transmission. Described as “mechanical and automatic,” a signal always elicits an action (Leach, 1976:12). In this way, accreditation operates as a signal for assessment, where assessment is both a technical, mechanical action and an automatic requirement for accreditation. Similarly, the accreditor, in turn, may elicit numerous responses simply by modifying the terms of accreditation. Institutions of higher education are obligated to respond to the signals of accreditation.

These three elements of communication outlined by Leach can, and must, be understood distinctly from one another, primarily because “it is by means of such distinctions and by refusing to admit that there is any ambiguity [between them] that we manage to perceive the world as we do” (1976:32). Indeed, signs, symbols, and signals are wholly ambiguous in their functions to represent elements of society – rather, culture is responsible for assigning particular meanings to these significant methods of communication and in shaping our understanding of the world around us.

It is important to note here that “meanings depend upon contrast” (Leach, 1976:33). What is meant by this is simply that we understand signs and symbols in context only, when contrasted against other signs and symbols. Words and images may change category and/or function based on their context. Whereas ‘assessment’ may operate as a sign in one context, it also may also function as a signal in another context. These distinctions are important in understanding the cultural use of such meanings. For instance, assessment operates as a sign of educational quality only when viewed in the context of higher education accreditation; outside of this context, assessment has no inherent connection to educational quality. In fact, it may otherwise be associated with financial audits, business practices, any many other fields unrelated to higher education (though the fields associated with assessment practices are often linked to financial matters, not irrelevant to the mission of federal and state oversight). Similarly, federal funding operates as a signal of accreditation, where accreditation is the resulting action required in order to receive federal funding. This symbolic meaning is only true for institutions of higher education, in other areas of the federal budget funds may not be distributed solely on the basis of accreditation.

Where the process of accreditation for institutions of higher education in the United States may be viewed as mythical in structure, it operates to impart the social understanding of federal oversight in the learning processes of higher education. Assessment is a key feature of this process. Described earlier as the third ‘episode’ in the mythical structure, assessment is the operative function, taking place at the institutional level in the process of becoming (or remaining) accredited. The processes of assessment

are what this research primarily seeks to address, in relation to its function within the myth of accreditation in the United States. With the structural framework for accreditation set in place, we may embark on the key element here: assessment.

### Invented Traditions and Ritual Practices

Associated with a rise in audit culture, assessment became a way for accreditors to document that institutions of higher education actually carry out teaching in such a way as to result in acceptable levels of student learning. The vital question here is whether the need for such documentation is actually necessary or useful – especially in light of the considerable trouble of documenting student learning in a way that is meaningful for education. Paul Geisler associates accreditation with a “control society”, in which “the accreditation process is also historically renowned for its propensity to constantly ‘re-invent’ procedures, standards and guidelines in an ever-present effort to be ‘progressive’ in the name of quality assurance” (2006:125). In an effort to make sense of the re-invention of accreditation standards to serve an ever-growing audit culture, Eric Hobsbawm’s exploration of invented traditions may shed some light, especially where institutions that appear to carry on with “nominal continuity” may be, in fact, “turning into something very very different [from each other]” (1983:5).

Invented traditions are “a set of practices, normally governed by overtly or tacitly accepted rules and of a ritual or symbolic nature, which seek to inculcate certain values and norms of behavior by repetition”; stated more simply, invented traditions are “responses to novel situations which take the form of reference to old situations” (Hobsbawm, 1983:1-2). In the case of higher education, the federal government simply

issues new, invented, increased audit standards to govern the processes of national and regional accrediting agencies who, in turn, develop similar standards by which to accredit individual institutions of higher education. Of course, the establishment of audit procedures is hardly new – such procedures are simply being utilized as an (re)invented tradition in order to achieve new social norms of control through the processes of assessment.

In considering assessment as a ritual practice, Leach is careful to identify the culturally-established association between ritual ideas/ideals and those objects which serve as physical representations of the ideas. In considering the ideas and objects associated with religious practices, Leach observes:

...if we are to think clearly about the ideas which are represented by words such as ‘god’ and ‘spirit’ we have to externalise them. We do this in two ways: (i) by telling stories (myths) in which the metaphysical ideas are represented by the activities of supernatural beings...(ii) by creating special material objects...which serve as representations of the metaphysical ideas and their mental environment. Clearly (i) and (ii) are interdependent; each is a metaphor for the other [1976:37]

In applying this analysis to assessment practices, it is useful to consider the meaning of words such as ‘assessment’ and ‘higher education’ as they relate to the cultural belief in accreditation. The metaphysical idea (or ideal) of institutional quality has come to be carried out by assessment activities, managed by those individuals furthest from student learning: institutional administration, and external auditors. Further, the metaphysical idea of institutional quality has come to be represented by those “special material objects” of assessment documentation. While this connection remains arbitrary –

wherein there is no inherent association with assessment documentation and institutional quality – the symbol of assessment documentation serves as a powerful cultural indicator of educational/institutional quality. This is the myth: accreditation is meaningful in representing institutional and educational quality for higher education in the United States, whereby the federal government may distribute funding to those institutions that reflect such qualities. The processes by which institutions attain accredited status, however, drift far from the goals that it claims to represent: educational quality and student learning.

While the onus remains on institutions of higher education to fulfill ever-expanding accreditation standards, Ward Goodenough likens the structure of these processes as cultural ‘recipes’, whereby the recipe contains the instructions and parameters for doing or creating within a society; they contain the structure by which individuals and institutions may operate (1981:85). Interestingly, once the recipe, or tradition, has become established within society, “the requirements for enacting it become a constraint affecting the form that other recipes and routines can readily take” (1981:87). In this way, the achievement of accreditation by means of assessment results in the invented tradition itself (assessment) becoming immovable. There is no other means by which an institution of higher education may receive federal funding. The likelihood that assessment might change, however, is quite low, primarily because “to change the rules to escape their onus is also to remove a source of advantage” (Goodenough, 1981: 78). For as regimented the invented tradition of accreditation may

be, successful completion of the task results in institutional receipt of federal funding – to renegotiate assessment would be to renegotiate federal funding.

In fulfilling the invented tradition of assessment, there is involved a considerable amount of ritual, albeit arbitrarily, consisting of the documentation of virtually every aspect of the institution's functions. For this reason, editor at large of the Chronicle of Higher Education, Jeffrey Selingo, describes accreditation as “an arcane subject” where “accreditors give their stamp of approval only to entities that grant degrees, places that meet their artificial standards for the number of books in the library, full-time professors with a PhD, and so on” (2013:11,107). However, it is important to recognize the significance of these processes, because “rituals do more than simply inscribe or display symbolic meanings or states of affairs but *instrumentally bring states of affairs into being*” (McLaren 1999:41). With the offering of federal funding to institutions of higher education, assessment functions as the ritual by which this arrangement is brought into existence. The symbols and signs involved in this process serve to create a cultural climate of ‘belief’ in the myth of accreditation.

## CHAPTER FOUR: FEDERAL OVERSIGHT, STATE INTERVENTION, AND ACCREDITATION

### US Department of Education and Federal Involvement

Since accreditors are not successful in ensuring quality, their power over Federal funds is not justified. A simpler, less costly procedure could be set up within the U.S. Department of Education to certify quality institutions – qualified institutions, and that should be sufficient to weed out institutions that are colleges in name only [Committee on Health, Education, Labor, and Pensions, 2004:10]

There is a clear tension between the U.S. Department of Education, accrediting agencies, and institutions of higher education. While the USDE is responsible for administering federal funds to accredited institutions, accrediting agencies are responsible for determining whether institutions are accredited. In this capacity, accrediting agencies are viewed as the ‘gatekeepers’ of federal funding: by their recognition of an institution’s quality, federal funds may be distributed. Because of this structure, institutions of higher education are recognized as working independently of federal control. In practice, however, it is important to recognize that the accrediting agencies are themselves accredited by the USDE. An accrediting agency has little influence over whether an institution receives federal funding unless the agency itself is first recognized, or accredited, by the federal government. In this way, the constraints, demands,

opportunities, and challenges of federal regulation may be passed on indirectly to institutions of higher education.

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) serves as the advising committee to the Secretary of the Department of Education on all matters related to accreditation.

Its primary function is to provide recommendations to the Secretary concerning whether accrediting entities' standards are sufficiently rigorous and effective in their application to ensure that the entity is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits [U.S. Department of Education, N.d.,a]

Further, NACIQI is also responsible for advising the Secretary “regarding policy affecting both recognition of accrediting and State approval agencies and institutional eligibility for participation in programs authorized under Title IV of the Higher Education Act of 1965, as amended” (National Advisory Committee on Institutional Quality and Integrity, 2014). In order for an accrediting body to receive recognition by the U.S. Department of Education, the agency must complete an extensive review process conducted by the Accrediting Agency Evaluation Unit (Office of Postsecondary Education) followed by a formal review and recommendation by NACIQI. Successful demonstration of the Secretary’s nineteen points of basic recognition eligibility criteria constitutes only the beginning of the agency’s application for accredited status (US Department of Education, 34 CFR Part 602 Subpart B – The Secretary’s Recognition of Accrediting Agencies).

Accrediting agencies must supply a narrative statement “accompanied by clearly referenced supporting documentation” demonstrating compliance with the Secretary’s basic eligibility criteria, which includes: accreditation standards, policies, financial audits, published list of accredited schools or programs, sample self-study reports, sample site visit reports, and sample minutes of decision meetings, and other in-depth documentation (U.S. Department of Education, N.d.,b). These documents are then reviewed and considered by NACIQI, after which a recommendation is made to the Secretary regarding the agency’s status as a federally-recognized accrediting body.

Because of the indirect relationship between the federal government and institutions of higher education, there are many ways in which federal regulations, or at the very least, federal expectations, are passed on to the institutions themselves. For example, Clifford Adelman, Senior Associate for the Institute for Higher Education Policy provided the aggressive recommendation that NACIQI “require that accrediting bodies employ specific language in student learning outcome standards to be applied to the institutions and programs subject to accreditation” (2014:50). Addressing the apparent lack of attention to student learning outcomes in accreditation requirements, Adelman observes, “the most convincing statements of required student learning, when one finds them, are based in what the *Degree Qualifications Profile* calls ‘operational’ verbs...those verbs are what one looks for in accreditation standards” (2014:51-52).

Accusing accrediting agencies of complacency in their regulation of student learning outcomes assessment, Adelman asserts that current accreditation standards “conveniently by-pass the task of expressing, clearly, to both students and the general

public, precisely what actions are required to demonstrate that students qualify for the degrees awarded by the institution” (2014:53). Calling for more “purposeful” language in ordering the expectations for student learning outcomes, Adelman asks accrediting bodies to “regain consciousness” by revisiting the language of accreditation standards in assessing student learning outcomes (2014:56).

With the ongoing and continued oversight of federally-recognized accrediting agencies, accountability surfaces as the paramount goal of federal legislation. “With tuition continuing to climb, and a growing number of graduates struggling to secure jobs and repay their student-loan debt, lawmakers will look for new ways *to hold colleges accountable* for their costs and outcomes” (The Chronicle of Higher Education, 2013, emphasis added). Gaston laments the future of higher education: “The question now appears to be whether accreditation can respond in ways that satisfy public and political demands before Congress again attempts to intervene” (2013, 55). Indeed, with the Congressional reauthorization of the Higher Education Act of 1965 occurring every four to six years, both accrediting agencies and institutions of higher education are beholden to remain informed of changes in legislation.

During a 2004 Congressional hearing to discuss the next reauthorization of the Higher Education Act of 1965, several concerns were raised regarding the accountability and reliability of the accrediting agencies recognized by the U.S. Department of Education. Former Senator of New Hampshire Judd Gregg reiterated the neoliberal ideology of federal involvement in higher education, stating the need to “adequately prepare students for the workforce”; lamenting the burden placed on employers as a

result of “the poor writing skills of recent college graduates”, Gregg reinforced the desire to hold institutions of higher education accountable “for producing quality educational outcomes” as a result of the monetary investment of the federal government (Committee on Health, Education, Labor, and Pensions, 2004:3). Interestingly, nowhere does the U.S. Department of Education identify exactly what “quality educational outcomes” look like; whereas based on the cultural rhetoric, one may reasonably recognize that federal regulations seek to produce “market-ready” citizens – veiled, though, by the repeated calls to improve education and student learning.

Senator Michael Enzi of Wyoming continued the neoliberal rhetoric in the 2004 hearing. Speaking of the financial burden accreditation places on institutions of higher education, Enzi observes, “as is the case with any other business, these costs are passed along to the consumer, in this case, the students” (Committee on Health, Education, Labor, and Pensions, 2004:4). The clear expectation that institutions of higher education align with businesses and market practices helps to shape our understanding of the federal expectations of higher education. If not to learn, then graduates who received federal loans and grants for their education should – at the very least – be willing and able to enter the workforce in such a way to demonstrate a “return” on the federal government’s financial investment. In effect, this discussion highlights the conflict between the ideal expectation of student learning with the legal and bureaucratic nationalist expectations of neoliberal state-minded economic development.

To provide a clearer picture of the derision and hostility of the federal government toward accrediting agencies in the United States, I will share one last example here.

President of the American Council of Trustees and Alumni, Jerry L. Martin, testified during the 2004 Congressional hearing about his vehement opposition to the current state of accreditation. He contended: “if we judge accreditors on their performance, it is a record of persistent failure. If meat inspectors were as loose as college accreditation, we would all have ‘mad cow’ disease” (Committee on Health, Education, Labor, and Pensions, 2004:10). Clearly, accreditors have not met the “quality” expectations of legislators and policy advocates in Washington. How, then, are there *any* accrediting bodies recognized by the U.S. Department of Education, if all have failed so completely in producing federally-acceptable, market-ready graduates?

#### State Council for Higher Education for Virginia

The State Council for Higher Education for Virginia (SCHEV) is not an accrediting body, though its participation in higher education is a critical component to the structure of accreditation. SCHEV functions to manage state higher education data, impact state policies, review institutional performance relative to state priorities, and provide authorization for institutions to operate as institutions of higher education in the state of Virginia (State Council of Higher Education for Virginia, Overview of Higher Education System in Virginia). In accomplishing the task of institutional performance review, SCHEV operates at both the undergraduate and the graduate levels, and reviews “the mission, programs, facilities and location of each of the existing institutions of higher education, each public institution’s six-year plan, and such other matters as the Council deems appropriate” (Code of Virginia, Title 23-9.6:1.1). At George Mason University, SCHEV’s functions are viewed as beneficial, described as a “catalyst to

promote greater access, quality, affordability, and accountability throughout the system” (George Mason University Factbook 2013-2014:10).

An important function of SCHEV is its influence in the appropriation of state funding for public colleges and universities. “By statute, the Council makes policy recommendations to the Governor and General Assembly affecting Virginia’s outstanding system of higher education in such areas as capital and operating budget planning, enrollment projections, institutional technology needs, and student financial aid”(George Mason University, Factbook 2013-2014:10). The obligation remains on the institution to provide evidence of academic program success as it directly relates to state funding:

[SCHEV will] review and require the discontinuance of any undergraduate or graduate academic program that is presently offered by any public institution of higher education when the Council determines that such academic program is (i) nonproductive in terms of the number of degrees granted, the number of students served by the program, the program’s effectiveness, and budgetary considerations, or (ii) supported by state funds and is unnecessarily duplicative of academic programs offered at other public institutions of higher education in the Commonwealth” [Code of Virginia, Title 23-9.6:1.6].

In fulfilling SCHEV’s review process, institutions must provide quantitative data to document full-time student enrollment equivalencies and graduation rates to demonstrate achievement of SCHEV-established minimums. SCHEV establishes enrollment and graduation expectations by using standardized formulas to create minimums for particular discipline groupings. For instance, the Virginia Public Higher Education Policy on

Program Productivity utilizes the following formulas in the establishment of enrollment and graduation minimums for public four-year institutions in Virginia:

**Formula for Graduates:**  $([\text{Student/faculty ratio}] \times [\text{number of FTEF}=2]) \div (\text{number of years to complete the degree}) = \text{minimum \# of graduates per year.}$

**Formula for FTE Enrollment:**  $([\text{Student/faculty ratio}] \times [\text{number of FTEF}=2]) = \text{FTE enrollment. (Where FTE = full-time equivalent, and FTEF = full-time equivalent faculty)}$

Degrees offered by the institution are then organized within the established discipline groupings, which establish different graduate and FTE expectations for each type of grouping (i.e. health sciences, STEM fields, humanities and social sciences). While the formulas do allow for the establishment of performance minimums within reasonable expectation for each institution, there is little allowance for programs that fall below established minimums.

If a degree program fails to meet the established performance minimum, in full time enrollment and graduation rates alone, at the end of the five-year reporting period, the institution must submit an Institutional Action Form documenting “whether the institution is discontinuing the program; or providing justification for continuing the program” (State Council of Higher Education for Virginia, Virginia Public Higher Education Policy on Program Productivity:2). Based on the information provided by the institution, reviewers then make recommendations to SCHEV who ultimately make decisions regarding academic program discontinuation or closure.

The risk of academic program discontinuation or changes in state funding is a motivating force in assessment practices at the institution-level. While SCHEV is not responsible for accreditation (enabling access to federal funds), it is responsible for authorizing institutions to operate and to delegate state funding. Failure to meet SCHEV requirements could result in an institution losing its state funding or ultimately being forced to shut its doors. Thus, the obligation to produce assessment data in fulfillment of both state and federal mandates is especially significant for institutions of higher education, despite the celebration of supposed self-governed higher education in the United States.

Southern Association of Colleges and Schools Commission on Colleges

It is difficult to imagine the bureaucratic super-structure that would be required were it not for regional accreditation's role in assuring institutional eligibility for federal student aid [Gaston, 2013: 58].

The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) is the accrediting body for all colleges and universities located in the southern region of the United States. Its goal is to achieve the “enhancement of educational quality throughout the region...and to improve the effectiveness of institutions by ensuring that institutions meet standards established by the higher education community that addresses the needs of society and students” (Southern Association of Colleges and Schools Commission on Colleges, Mission Statement of the Commission). Despite its initial statement of enhanced educational quality, SACSCOC makes it clear that their obligation is to uphold the standards of the larger “higher

education community” (as dictated by the USDE) and to address the needs of society (first), and students (second). SACSCOC states that accreditation of an institution

signifies that the institution (1) has a mission appropriate to higher education, (2) has resources, programs, and services sufficient to accomplish and sustain that mission, and (3) maintains clearly specified educational objectives that are consistent with its mission and appropriate to the degrees it offers, and that indicate whether it is successful in achieving its stated objectives [Southern Association of Colleges and Schools Commission on Colleges, 2012:1].

Further, SACSCOC states “the product of accreditation is a public statement of an institution’s continuing capacity to provide effective programs and services based on agreed-upon requirements” (2012:2). Interestingly, the Commission does not assert that accreditation, in and of itself, validates the educational quality of an institution, nor does it convey particular improvements in student learning outcomes, despite federal demands for this type of quality verification. The organizational order of accreditation is clear and distinctive, and is crucial to understanding how these statements impact the policies which, in turn, impact institutions of higher education.

As an accrediting agency recognized by the US Department of Education, SACSCOC must undergo review by the USDE in order to operate in its capacity as a regional accreditor. In its most recent review, NACIQI made recommendation to the Assistant Secretary of the USDE that renewal be granted for a period of three years to SACSCOC, citing “no compliance issues and no further discussion of the agency’s report” (National Advisory Committee on Institutional Quality and Integrity, 2014:14-15). With this recommendation, SACSCOC operates in compliance with the federal

guidelines for regional accreditors, and as such, inevitably must pass along those mandated guidelines to the institutions they accredit.

In order for an institution to become regionally accredited by SACSCOC, the institution must meet the stated accreditation standards regularly published by the association. Further,

the process for initial and continued accreditation involves a collective analysis and judgment by the institution's internal constituencies, an informed review by peers external to the institution, and a reasoned decision by the elected members of the Commission on Colleges Board of Trustees [Southern Association of Colleges and Schools Commission on Colleges, 2012:5].

The Board of Trustees are elected from each state represented by the Commission, which, for SACSCOC, includes: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia. Members of the Board of Trustees are elected "to guide the organization's work and to implement the accreditation process" (Southern Association of Colleges and Schools Commission on Colleges, Commission Organization). Interestingly, an overwhelming majority of the members of the Board of Trustees serve primarily in an administrative capacity at each of their respective institutions. For example, of the 71 elected members of the Board of Trustees at the time of this writing, 41 are university or college presidents, seven are provosts or vice provosts, five are chancellors, one is an academic dean, five are executive vice presidents, two are directors, nine are public representatives, and only one is a professor. Teaching faculty represent only 1% of the elected body which operates to make critical decisions regarding accreditation for this agency.

During the internal review process for accreditation, the institution must consider its own achievement of its stated mission and objectives, after which the institution must “complete an application documenting its compliance with Core Requirements 2.1-2.11, Comprehensive Standards 3.3.1, 3.7.1, and Federal Requirements 4.1-4.9. These requirements and standards are basic expectations of institutions seeking initial status with SACSCOC which is Candidacy” (Southern Association of Colleges and Schools, 2013: 1). After candidacy status has been granted, the institution must provide documentation of compliance for each SACSCOC requirement, after which “the SACSCOC Committee on Compliance and Reports makes recommendations concerning an institution’s status to the Executive Council of SACSCOC which, in turn, makes its recommendation to the SACSCOC Board of Trustees which takes final action on the institution’s status” (Southern Association of Colleges and Schools, 2013:2).

The Principles of Accreditation: Foundations for Quality Enhancement, published by SACSCOC provides the criteria by which institutions may become eligible for accreditation, if sufficiently documented. The Principles of Accreditation is divided into four sections, which include a section on integrity, core requirements, comprehensive standards, and federal requirements. Throughout these sections, there are a total of 111 major and sub-requirements. Of those, only nine are expressly and explicitly related to student learning (one of which is not required in an institution’s compliance certification). A large majority of these requirements address the financial, administrative, and structural devices in place that govern the operation of the institution

and are a reflection of the governance of the federal interests in the bureaucratic documentation of matters not directly related to educational quality.

Rather than education, the focus of these requirements is primarily on *institutional* quality. This distinction is important because of the significant attention paid to matters on institutional organization, governance, financial resources and management, and other services; there is a clear and obvious gap in the accreditation standards being directly related to actual improvement in student learning. These federally-approved standards do not align with the earlier stated discontent of legislators with the accreditation process in failing to demonstrate adequate student learning.

Due to the exhaustive nature of the accreditation requirements outlined by SACSCOC, and the limited space of this research, I will address only two of the main accreditation requirements here: Comprehensive Standard 3.3.1.1 and Core Requirement 2.5. These two requirements, as former Associate Provost for Institutional Effectiveness at George Mason University, Karen Gentemann, observed are “two of the areas that are very important [for accreditation] and ones in which institutions fail often” (e-mail to author, January 20, 2015).

Core Requirement 2.5 states

The institution engages in ongoing, integrated, and institution-wide research-based planning and evaluation processes that (1) incorporate a systematic review of institutional mission, goals, and outcomes; (2) result in continuing improvement in institutional quality; and (3) demonstrate the institution is effectively accomplishing its mission [Southern Association of Colleges and Schools Commission on Colleges, *The Principles of Accreditation: Foundations for Quality Assessment*, 2012:18]

Comprehensive Standard 3.3.1.1 states

The institution identifies expected outcomes, assesses the extent to which it achieves those outcomes, and provides evidence of improvement based on analysis of the results in each of the following areas: educational programs, to include student learning outcomes [Southern Association of Colleges and Schools Commission on Colleges, *The Principles of Accreditation: Foundations for Quality Assessment*, 2012:27]

Through an analysis of these standards, as they are documented by George Mason University, I aim to demonstrate the bureaucratic superstructure that is imposed in this practice, as an embodiment of the ritual of assessment, and as it fulfills the myth of accreditation in the United States.

## CHAPTER FIVE: GEORGE MASON UNIVERSITY

### The University

Succeeding as an institution of higher education in the United States is an endeavor that requires careful navigation and an astute awareness to the political, cultural, and economic climate of the post-modern global world. The traditional role of the college or university has, in some ways, changed dramatically in order to keep pace with the growing demands of accreditors, policy makers, the U.S. Department of Education, and an international market. Common ideas about institutions of higher education now focus intently on the expectation that higher education produce competent, efficient, market-ready employees.

The central mission of public higher education in this county is to educate and prepare young adults to assume productive roles in a modern workforce, contribute to our national and regional economic competitiveness, strengthen our communities and nation as educated and caring citizens, and live enriching lives [Mulhern et. al, 2015:6].

As an institution of higher education that had managed to thrive in this climate, George Mason University is an ideal case-study of the ways in which the institution seeks to achieve the varied and often competing demands of its internal and external constituents, while still aiming to achieve the goal of teaching and learning.

Established in 1957 and founded in 1972, this relatively young university boasts world-class professors and a soaring student enrollment of over 32,000 at the time of this writing (George Mason University, Mason History and Tradition). With an operating budget just shy of \$950 million, George Mason University maintains 72 academic buildings, houses over 6,000 residential students, and employs over 1,200 full-time teaching faculty (George Mason University, 2014-2015 Facts and Figures). With four locations in the Commonwealth of Virginia and a newly opened campus in Incheon, Korea, GMU has established a geographic influence representative of the global interests of the university. GMU's mission statement reflects the university's goals toward both local and global impact:

A public, comprehensive research university established by the Commonwealth of Virginia in the National Capital Region, we are an innovative and inclusive academic community committed to creating a more just, free, and prosperous world [George Mason University, Mission Statement].

Self-described as an “economic powerhouse” and a “major teaching and research university”, university administration promises that “Mason’s commitment extends far beyond the number of diplomas conferred each year” through the establishment of (economic) partnerships with the local and regional community (George Mason University, Economic Impact on the Community). The university even provides a list entitled “Top Mason Employers,” indicative of the promising employment prospects for university graduates, which includes major government contractors, international

corporations, top health industry systems, and major international financial firms (George Mason University, Top Mason Employers).

### The Global University: A Neoliberal Endeavor

At a time when the value of higher education is greater than ever before, and policymakers nationwide are calling for increases in college enrollment and degree completion...public institutions and states must align their financial strategies with efforts to meet these goals [Mulhern et. al, 2014:63]

In an interview with former George Mason University provost, Peter Sterns, Dr. Sterns reflected on the global goals of the university, providing his insight regarding the critical components of creating a global university. While it is likely that international endeavors are tied to potential economic benefits, Sterns emphasizes the need to ensure a “clear, identifiable educational benefit” to any global venture, primarily to pacify the inevitable “cluster of academics ready to claim...that the effort is misplaced” (2014b). Sterns’ awareness of the discrepancy between educational goals and entrepreneurial efforts is clear; he urges that a “mutual benefit” for global exchange is crucial to ensuring a successful university. “Mason welcomes a growing number of international students. We value what they contribute to our global climate...and their out-of-state tuitions” (Sterns, 2014b). The relationship between globalization and university funding matches nicely the economic neoliberalism associated with post-modern national development.

The resulting tension between faculty and administration regarding international enterprises reflects the differing goals the institution must achieve. Education is required to ensure accreditation, which in turn ensures federal funding. Entrepreneurship is

necessary to ensure enough funding is available for the institution to continue operating, but at what cost to education?

The former provost knows all too well the difficulty that comes with uniting these two needs; “I became known as a globalist partly perhaps because of the backroom grumping by unpersuaded faculty members about global goals” (Sterns, 2014b). Further, he comments, “continuing to teach while serving as provost was a useful way to maintain some trust credentials with faculty” (Sterns, 2014a). It becomes clear that university operations become increasingly complex in attempting to serve the needs of students while continuing to support the ever-expanding complex of real estate, property, administrators, accreditors, politicians, and faculty. Arguably, equality is not possible in the neoliberal paradigm, and one or more elements will be shortsighted in the process.

#### University Accreditation: Assessment Cycles and Academic Program Review

George Mason University received initial accreditation from SACSCOC in 1972 and received reaffirmation of accredited status most recently in 2011 (Southern Association of Colleges and Schools Commission on Colleges, Institution Details). Although the university will not undergo reaffirmation again until the year 2021, there is an ongoing barrage of assessment activities that requires the active participation of all members of the university. The university is comprised of both administrative and academic units, which constitute the functions of the institution and which must be assessed in order to comply with accreditation standards. The assessment processes required to adequately document the activities of the university are highly regimented and are orchestrated and maintained by the university’s Office of Institutional Assessment.

Assessment of academic units at GMU is conducted through multi-layered processes comprised of an annual assessment cycle and a periodic in-depth unit-level examination called Academic Program Review (APR). The annual assessment cycle “comprises identifying outcomes and measures, conducting assessments, reporting findings, and devising an action plan” (George Mason University, 2011a:19). APR began at the university in 1995 when changes were made to the reporting cycle for university assessment. Under the new system, APR is conducted for each academic unit every seven years, including a mid-point update every three years, after the APR is concluded. “Time between [APR] reports should be spent making the recommended improvements or changes” (George Mason University, Academic Program Review Guide:3). The review is initiated with a yearlong self-study which includes in-depth analysis of program goals, outcomes, objectives, and other data collection.

Each APR report addresses the following areas: mission statement and goals; student enrollment; demographics; graduation rates and job placement; student advising; student learning assessment; curriculum assessment; faculty as a whole...alumni relationships; staffing; physical facilities; program outcomes; overall strengths and weaknesses; and an academic action plan [George Mason University, 2011b:1-2].

Of the twelve areas of review that are addressed by the APR, while some may be indirectly related to the quality of teaching and student learning, only one area is directly and explicitly focused on student learning: student learning assessment. The other eleven areas of review are focused primarily on institutional quality and business-minded foci,

all of which very closely resemble the information sought by USDE university profiles and state reporting requirements.

GMU collects and manages institutional data using the third-party online assessment data management system called Tk20. This advanced program advertises a “holistic approach” to assessment, highlighting the following capabilities: “... assessment is evidenced through a complete process that includes the stated outcome/objective, assessment tool, results and actions for continuous improvement. This allows substantiated rationale to be linked with budget requests creating a sound justification for planning and budgeting decisions” (Tk20, Planning & Analysis). Essentially, it is an in-depth data management system, where users throughout the institution, including faculty and administrators, may access and input their actual assessment goals and outcomes. Although I was prohibited from accessing GMU’s Tk20 account directly, or the formerly utilized WEAVE software, GMU’s use of this program serves to harness the institution’s assessment data so that adequate claims might be made that the institution meets all accreditation requirements.

At the time of GMU’s last reaffirmation of accredited status, the university was using an assessment management system called WEAVE, which, due to multiple difficulties in using the system, was discontinued in favor of the more user-friendly Tk20 program in order to “reaffirm the importance of conducting good assessments rather than struggling with a reporting system” (George Mason University, 2011b:10). Interestingly, institutional difficulty in “conducting good assessments” is not generally recognized here as a topic for further inquiry. However, a survey of institutional discontent with

assessment practices and arbitrary reporting requirements indicate that alternative solutions might better serve the academic and teaching goals of higher education.

For the current fiscal year, all academic units conducting an Academic Program Review are instructed to input unit-specific data into Tk20. For administrative units, this includes a mission statement, all unit goals that relate to the current strategic plan, and the identification of one unit goal to be assessed in the next fiscal year – to include a planned action for that goal. For academic units, this includes a mission statement, 5-7 student learning outcomes for the degree program, a curriculum map, and the identification of one student learning outcome to be assessed in the next fiscal year, complete with the planned measure for that outcome (GMU, 2014-2015 Assessment Reporting Requirements). Some of these terms require brief explanation:

**Student Learning Outcome:** “A concise written statement of knowledge, skills, or values students will acquire upon completing the course or degree program” (GMU, How to... Create and Measure Student Learning Outcomes). The Office of Institutional Assessment defines *learning* as “an action that involves a cognitive process”, and defines *outcome* as a “measurable, observable event”. As academic programs must create student learning outcomes for their respective curriculums, it becomes evident that the expectation does not match the learning process; cognitive processes are often not always readily measurable nor are they generally observable, and any such measure is highly subjective and does not suit standardized objectives.

**Curriculum Map:** The alignment of “program goals to specific courses to determine how the curriculum contributes to program success” (Tk20, CampusWide). A curriculum map enables academic units to test the alignment of individual program courses with the specific program student learning objectives established for the program. The Office of Institutional Assessment advises academic units “If you see a course/experience that doesn’t cover a learning outcome, or if you see a learning outcome that is not covered in any of the courses/experiences, you’ll need to do some serious thinking about whether it is a necessary part of the curriculum” (George Mason University, How to...Make a Curriculum Map). As curriculum mapping focuses primarily on the effectiveness and relevance of academic programs, this action may serve to circumvent or altogether eliminate the risk of program failure, essentially preserving the various funding that may serve the program.

Every three years, the provost appoints tenured faculty (only) to the Academic Program Review Committee, which reviews the APR for each academic unit under review. At the end of the unit’s APR, the Academic Program Review Committee and The Office of Institutional Assessment each create a report for the provost, who then attends a formal meeting with the Dean of the academic unit to discuss the results of the APR. During this meeting, “all issues relevant to the effectiveness of the program are open for discussion and in some cases, deans have made resource commitments during the meeting” (George Mason University, 2011b:2). Clearly, financial resources are of paramount significance to the outcomes of the APR. The implication is that academic

programs which do not “produce” satisfactory results (as demonstrated through the business loci of graduation rates, alumni employment, and other similar metrics) or that do not achieve adequate student learning outcomes may be faced with budget reductions or entire courses being eliminated from the curriculum. In other words, faculty must repeatedly work to defend the validity of their departments, courses, and even employment through the production of consumer-ready data that the institution might ‘sell’ to consumers, accreditors, and the federal government.

To better situate institutional assessment at GMU, it is important to recognize the discrepancy in representation and oversight at every level of these processes. Initially, unit-level self-studies were implemented by the university president in 1996, which was in turn revised into a university-wide process by the university provost in 2005 (George Mason University, 2011b:1). While APR is conducted and maintained by the Office of Institutional Assessment, the provost is responsible for appointing the tenured faculty committee members of the Academic Program Review Committee. Not surprisingly, tenured faculty only comprise approximately 27% of all full and part-time faculty employed by the university (George Mason University, 2014). Coupled with the high turnover in Committee membership, there is limited opportunity for significant faculty oversight of these processes.

The committee, together with the Office of Institutional Assessment, is responsible for making recommendations to the provost regarding the outcome of a unit’s APR. “One important outcome of academic program review...is that each dean and the provost are informed about the goals and plans of each academic unit, and also of any

important deficiencies, information which provides additional background for planning and budgeting” (George Mason University, 2011a:19). Considering the extremely limited pool from which the committee is drawn, and the relatively massive administration represented by the Office of Institutional Assessment (administrative faculty and staff comprise the majority of GMU’s workforce) it is clear that administrative goals and oversights, rather than faculty-governed teaching, is the focus of assessment at the university. The source of this oversight, however, does not originate from within the institution; rather, it is the external governance of the federal and state governments and accrediting agencies that has yielded a complex web of arbitrary signifiers through external measures that bear down on institutions of higher education.

#### Core Requirement 2.5

*The institution engages in ongoing integrated, and institution-wide research-based planning and evaluation processes that 1) incorporate a systematic review of institutional mission, goals, and outcomes; 2) result in continuing improvement in institutional quality; and 3) demonstrate the institution is effectively accomplishing its mission [The Principles of Accreditation: Foundations for Quality Assessment, 2012:18].*

Core Requirement 2.5 focuses primarily on institutional quality, addressing the mission and the institution’s effectiveness in achieving its goals. It is of interest that this requirement is viewed as especially important in the accreditation process, considering that it is an area “in which institutions fail often” (Karen Gentemann, e-mail to author, January 20, 2015). As expectations of institutional quality increase, it becomes equally important for institutions to document the type of evidence that may satisfy accreditors and the federal government. This process of documentation is not inconsequential, as it

requires an intricate understanding of the myth of assessment, and the crucial ability to decode its signs, symbols, and signals.

During GMU's reaffirmation of accreditation in 2011, a 22-page report was prepared to document the university's compliance with SACSCOC Core Requirement 2.5. In demonstrating compliance with institution-wide research-based planning and evaluation processes, GMU chose to utilize evidence related to the institutional mission, the 2014 Strategic Plan and related planning initiatives, additional planning activities, and the integration of assessment, planning, and budgeting. As a standard not inherently or explicitly connected to student learning or educational quality, requirement 2.5 is focused primarily on institutional quality and operational processes. In defending university compliance with this standard, the report states:

George Mason University's mission and strategic plan and related planning initiatives provide guidance for all improvement processes and impact the deliberations of the President's Executive Committee, the Budget and Planning Team, Deans and Directors, the Academic Council, the Graduate Council, the General Education Committee, the Distance Education Council, and the Faculty Senate to name a few of the deliberative bodies that create or recommend policies and procedures for the University. These councils and committees are both informed by and impact decisions within Academic Program Review, Enrollment Planning, the Campus Master Plan, and Assessment and Institutional Research Activities [George Mason University, 2011a:1]

As this exhaustive list demonstrates, "assessment [of educational programs] is used by *administrators* for both planning and budgeting" (George Mason University, 2011b: 1, emphasis added). It is important to note the focus on institutional quality throughout this

process, as distinct from educational quality, as well as its purpose to serve administrators in their efforts to gain and maintain accredited status.

Documenting achievement of the university mission appears to be inherently linked to student learning, especially where the universal mission of institutions of higher education are to be centers of learning. Exploring five aims of the university mission statement, the report documents the ways in which the mission both intersects and departs from student learning, and the ways in which this documentation fulfills this accreditation standard:

1. Educate Students for the 21<sup>st</sup> Century – Men and Women Capable of Shaping a Global Community.

Highlighting the global focus of the university mission statement, this point aims to document improvement in institutional quality and accomplishment of the mission through GMU's achievement of the global elements of the mission. As part of this evidence, the report documents the classification of more than 70 courses in the core curriculum as "Global Understanding" courses, the creation of nine new degree programs, minors, and graduate certificates designated as global in nature, and the active engagement of the university in "joint programs with international partners and international recruitment initiatives" (George Mason University, 2011a:2-4). While new degree programs and courses represent significant capital investment from the university, they also serve as tools to grow the institution and its resources, especially in areas where business partnerships are formed for the procurement of international programs.

Evidence of students being “educated for the 21<sup>st</sup> century” and “capable of shaping a global community” was addressed briefly, with a claim that “a campus climate has developed that embraces diversity of cultures” (George Mason University, 2011a:6). Using survey results to substantiate the claim, GMU purports that “the university has been successful in promoting global awareness and understanding on campus”, as evidenced by graduating seniors strongly agreeing with survey statements regarding their growth in “knowledge, understanding, and awareness of global considerations” (George Mason University, 2011a:6). Not only are these statements difficult to interpret in their applicability to the measurement of institutional quality, but they are loosely tied to the cognitive student learning that is measurable or observable, which assessment at GMU claims to achieve.

## 2. Encourage Freedom of Thought, Speech, and Inquiry in a Respectful Setting that Values Diversity

GMU’s assessment report embraces survey data in documenting an improvement in student behavior regarding diversity. The university cited a marked increase in the number of students who indicated that they would be very likely to “reach out...and socialize...with people different from themselves” (George Mason University 2011a:6). In another example, the report cites the university’s high graduation rates for black and Hispanic students, as compared to national norms. As this particular assessment is quite outside of the realm of measurable observable cognitive ability, it is clear that while assessment claims to focus on student learning outcomes, these results do not align themselves to the institution’s definition for such outcomes.

### 3. Offer Innovative and Interdisciplinary Courses of Study Providing Analytical and Imaginative Thinking

Emphasizing the university's contributions to the "needs of the Commonwealth of Virginia, the capital region, the nation, and the world", the report highlights the development of 83 new degree programs over an eight-year period which encompass "areas of national importance" such as graduate degrees in Biodefense, Neuroscience, and International Commerce and Policy (George Mason University, 2011a:8). In the process of documenting the fulfillment of the institution's mission, this report reveals the points of focus which most adequately represent the neoliberal tendencies of assessment, using language relevant to the market and the "needs of the nation".

Again citing student survey results, GMU attempts to demonstrate the achievement of analytical and imaginative thinking by using self-reported student agreement that a particular course "linked issues in the [academic] major to wider intellectual and community concerns [and] required them to think critically" and that they "were required to organize ideas, information or experiences into a new, more complex interpretation/relationship" (George Mason University, 2011a:9). The idea that students might provide such self-evaluation is an example of the ultimate outcome of an audit society, in which the external observation is not required but rather individuals are trained to audit themselves; embracing student self-assessment through surveys is one way that this result may take shape.

### 4. Support a Faculty Excellent in Teaching, Responsive to the Needs of Students, and Active in Pure and Applied Research

As a supporting role in the mission to educate, the documentation of this item is easily separated from evidence of student learning. GMU provides extensive data of institutional support for faculty. Interestingly, as part of this documentation, the report includes a summary of the Center for Teaching Excellence (CTE), which was created to provide a “focus on improving learning and instruction” (George Mason University, 2011a:9). As evidence of this improvement, the CTE is described as “instrumental in supporting the implementation of a new pathway to tenure – tenure with genuine teaching excellence” (George Mason University, 2011a:9-10). Not only does this documentation suggest that faculty are in need of instructional remediation, it suggests that tenure is a tool to be used by the administration in order to garner behavioral changes in the faculty. A separate study to investigate the dynamics of these implications would provide a useful contribution to the campus community.

##### 5. Maintain an International Reputation for Superior Education

As with other international or global endeavors, neoliberal influence is readily apparent in the documentation of GMU’s international reputation of “superior education”. Disregarding any available documentation of student learning related to the institutional achievement of this mission, the report provides a list of the most recent high-profile private and federal grants received for international activities. Of course, grants provide critical funding necessary for the individual academic departments and faculty to complete their work, and documenting the receipt of such grants demonstrates the financial ability of the institution’s faculty to procure outside funding, but

simultaneously fails to document “an International Reputation for Superior Education” in substantive ways.

Reviewing the creation of the institution’s 2014 Strategic Plan, the Strategic Implementation Committee was responsible for designing metrics for each goal of the Strategic Plan, and, as a result, the committee “agreed upon three to twelve metrics for each of the seven goals in the strategic plan” (George Mason University, 2011a:13). Of the seven Strategic Plan goals and 42 Strategic Plan metrics outlined in the report, as evidence of the institution’s effectiveness and of university-wide planning, only one of these items explicitly addresses student learning as an institutional goal. Metric nine, for the second goal of the 2014 Strategic Plan states that the institution will “measure critical thinking skills among students”; the remaining metrics are all unrelated to student learning outcomes, as expressed in the 2014 Strategic Plan (George Mason University, 2011a:14).

#### Comprehensive Standard 3.3.1.1

*The institution identifies expected outcomes, assesses the extent to which it achieves those outcomes, and provides evidence of improvement based on analysis of the results in each of the following areas: educational programs, to include student learning outcomes [The Principles of Accreditation: Foundations for Quality Assessment, 2012:27].*

During GMU’s reaffirmation of accreditation in 2011, a 26-page report was prepared to document the university’s compliance with SACSCOC Comprehensive Standard 3.3.1.1. As this standard directly addresses the assessment of student learning outcomes, the report focuses heavily on the outcomes of GMU’s Academic Program

Review. Primarily, the report addresses five specific improvements made as a result of conducting the APR.

#### 1. Foreign Languages, BA

As a result of the 2010 APR for the BA degree in Foreign Languages, GMU reports that actions were taken to “increase enrollment and improve retention” (George Mason University, 2011b:3). Interestingly, it was determined that “a more efficient way to keep track of students and their career objectives” was needed in order to achieve this improvement to the academic program (George Mason University, 2011b:3). The association of employment, career choices, and other market-focused idioms with the improvement of an academic program demonstrates, again, the influx of neoliberal policies and agendas in the educational “marketplace” of higher education.

#### 2. Chemistry, BS

As a result of the 2008 APR for the BS program in Chemistry, GMU documents, very clearly, the improvement of a measurable, observable cognitive element of the degree program: the ability to write chemical equations correctly. In order to achieve the improvement, “the Chemistry Department decided to re-emphasize at all levels of teaching in the department the importance and practice of writing chemical equations” (George Mason University, 2011b:3). Interestingly, however, the recognition of a legitimate improvement in student learning yielded a request for funding for new equipment which was ultimately unfunded: “The inventory and condition of some equipment were identified as less than adequate, and the dean agreed to support the

purchase of new equipment. Unfortunately, subsequent budget shortfalls have put these plans on hold” (George Mason University, 2011b:4).

### 3. Cultural Studies, PhD

As a result of the 2009 APR for the doctoral program in Cultural Studies, faculty recognized the slow progress of students toward degree completion. In order to improve graduation rates and program retention (neither of which are de facto measures of student learning), the curriculum was modified in order to better structure students’ path toward degree completion. Essentially, this economic improvement serves the marketability of the program for prospective students and to secure funding and other university resources.

### 4. Psychology, BA

As a result of the 2007 APR for the BA degree in Psychology, the curriculum for the program was modified to “reduce slightly the number of required courses, thereby increasing flexibility” (George Mason University, 2011b:4). Interpreting this as an economic improvement to the Psychology program, increased flexibility results in increased marketability to prospective students – again associated with the individualism of neoliberal thought and the privatization of education as a cultural commodity.

### 5. Conflict Analysis and Resolution, PhD

As a result of the 2006 APR for the doctoral program in Conflict Analysis and Resolution, a recognizable student learning outcome improvement was achieved. Identifying the need for increased training in research methods, a plan was created to “strengthen the statistical competence of doctoral students” in order to improve students’

ability to formulate “an acceptable dissertation proposal” (George Mason University, 2011b:4).

A review of the examples provided by GMU as evidence of improvements resulting from the APR, it becomes clear that the majority of citations seek to demonstrate economic, rather than academic, improvement and stability. What, then, qualifies as “evidence of improvement” of an educational program? The competing models of institutional and educational improvement in these assessment processes demonstrate the multiple agendas that must be addressed, and deciphered, before we are able to clearly understand what is being accomplished.

In further documenting university compliance with SACSCOC Comprehensive Standard 3.3.1.1, routine assessment is identified outside of the APR. While APR occurs only every seven years for each academic unit, assessment is conducted on a routine basis in the interim. Using the former assessment data management program, WEAVEonline, the report claims “all academic degree programs report at least three student learning outcomes, methods of assessment, findings, and assessment plans” in the online database (George Mason University, 2011b:7). Initially, this process was completed on a two-year cycle, from 2007-2009; then, it was shortened to a one-year cycle in 2009-2010 and has since continued in one-year assessment cycles.

In completing their annual assessments, academic units are instructed by the administration as to what constitutes a “good” assessment measure, thereby regulating and enforcing the type of information that is gathered, thus ensuring that it is relevant and valuable to the external constituents to whom the institution must respond.

Assessment plans and actions before and after they are entered into WEAVE receive extensive feedback on quality from the Office of Institutional Assessment. Guidance on what to do to bring outcomes and measures up to 'good' and, in some cases, 'best' practice is provided to every program, often multiple times...through a standard form that addresses the acceptability of each unit's outcomes and measures [George Mason University, 2011b:8]

The feedback provided to faculty by university administration is not clearly relevant to student learning, rather, it is extremely pertinent to very specific accreditation criteria. As faculty members are encouraged to seek improved student learning outcomes, it remains unaddressed that the measures by which the outcomes are evaluated are themselves devised for accreditors and not for educators. Educators must be guided toward taking "correct" measurements of student learning; therein abandoning their own intuitive methods of assessing student learning.

## CHAPTER SIX: CONCLUSION

### Signs, Symbols, and Signals: The Myth of Accreditation

Sociology professor Gaye Tuchman (2009) conducted an in-depth study of a major state university in which she documented the excessively corporate governance that coordinates accreditation practices in higher education. Tuchman investigated the outcomes of imparting the corporate (neoliberal) agenda through the use of assessment practices, primarily as it impacts the faculty of the university. Tuchman argued that the overall dissatisfaction of faculty with assessment processes may be due to the “lack of carrots” in such practices, or, in other words, a lack of benefit. In my view, Tuchman’s assertion that the ideological problems between faculty and administration in the matter of assessment might be due to a “lack of carrots” is inadequate, and perhaps flawed at its base. That is, Tuchman provides data that point to conflict between faculty and administration (pedagogical conflict, workload, salaries, insider/outsider relationships); she also mentions the usefulness and benefits of assessment to some professors on the university campus. I posit that there is much more at stake here than “carrots” for the faculty. There is no evidence in Tuchman’s assessment of a single university, that an increase in “carrots” would result in resolution of the conflict described. This hardly seems to be the case, because the problem is one of ideology, rather than incentives. Further, Tuchman’s identification of incentives as a means to address the conflict is itself

embedded in neoliberal thought, rather than, for example, issues related to pedagogy, as argued, for example, at George Mason University (conversation with S.R. Trencher; Department Chair; Member of Faculty Senate during accreditation process 2011).

It may be considered that faculty have simply not subscribed to the myth of accreditation, thereby increasing the difficulty with which administrators elicit “appropriate” behavior from their colleagues. Indeed, for faculty who do not believe (or agree with) the myth of accreditation, “the complex and stultifying process of academic program accreditation...limits growth, heterogeneity, flexibility, locality, multiplicity, and individuality as it relates to curriculum, teaching, evaluation, and administration” (Geisler, 2006:125). Because of the ability of the myth to shape and transform understandings of the world, there must be a clear delineation between those who believe and those who do not. There is an obvious difficulty in applying the “myth of accreditation” to those who do not agree with or endorse its commodified product.

There may also be an issue of understanding. If one does not understand, or is not aware of, the myth, then there can be little expectation of successfully fulfilling its mandates. Just as Leach (1976) likened the interpretation of signs and symbols to a religious context, so the subscription to the cultural myth of accreditation must be believed before it can be enacted or performed. For the objects (symbols) which represent the myth may have a dramatically different meaning outside of its use or function within the myth. Thereby, accreditation and its compilation of assessment documentation must bear very different implications when viewed outside of the structures of accreditation, which are laden with neoliberal goals and practices. It is not surprising, then, since the

administration is primarily responsible for conducting the ritual of assessment, that those outside of the myth will not find use for its function.

How, then, should higher education continue to operate as administrators perpetuate the myth and its rituals, while faculty (and students) remain obligated to ‘produce’ its desired effect? There are two apparent options. First, accreditation and assessment may ultimately dominate the higher education community, resulting in total achievement of mythical performance, eradicating dissenters through the use of neoliberal tools such as tenure and funding. The second option might be that the myth will change. With the continued rise in the performativity of institutions of higher education, there will either require full participation in the rituals of assessment, or there will remain a population of non-believers, thereby challenging the validity of the myth, its symbols, and its purpose. Navigating this terrain will require careful attention to the continually changing political, social, and economic climate that continues to influence institutions of higher education.

#### Challenges and Opportunities: Overcoming Neoliberalism

The number of students attending college is at an all-time high, and is on the rise: “[National] college enrollment was 21.0 million in fall 2011, which was nearly as high as the record enrollment in fall 2010...College enrollment is expected to set new records from fall 2012 through fall 2021. Between fall 2011 and fall 2021, enrollment is expected to increase by 13 percent” (National Center for Education Statistics, 2012). With continued increases in the number of students seeking higher education, the degree to which public funding has becoming increasingly difficult to obtain is a matter of serious

concern. While funding continues to be a challenge for institutions of higher education, there results a perplexing conundrum in which political and public expectations of higher education demand accountability (achieved through accreditation) and improvement (achieved through assessment) coupled with fewer (and sometimes lesser) resources and support. Indeed, "...the most obvious challenge [in higher education] has been the significant disinvestment in public funding, the conversion of higher education from a public good to a private good" (Sterns 2014a).

There remains evidence that higher education leads to increased economic stability for both individuals who graduate and the communities where they live and work. Michael Hout (2012) discusses what he calls the "social returns" of education for the communities of college graduates, and notably the overall increase in wages for those with less education due to the increased presence of college graduates in the workforce and in the community. "If education boosts collective productivity as well as personal productivity...then increasing educational attainment for a population might be a key causal factor in overall economic growth" (Hout 2012, 392). It then stands to reason that questions arise: If there is evidence that an educated population directly benefits local economic growth, why is there a continued decline in funding for colleges and universities? Why is state and federal funding tied to supposed educative quality, when there is evidence that the benefit of a college education exists regardless of the *assessed* quality of the institution? (Although this, too, is becoming increasingly complex as federal employers embrace the myth of accreditation, limiting employment only to those graduates with degrees of assessed quality.) Even if there exists employment bias toward

graduates of certain high-profile institutions, no one institution is capable of graduating enough students to take hold of the entire job market, so the continued success (indeed, existence) of institutions of higher education is crucial in securing the communal benefit of an educated populace. Hout's statement here is worth considering:

If higher education were not tied to economy and society by the causal relationships identified in recent research, then it...would still be the finishing school it once was for the offspring of elites who showed an interest in the arts and sciences... In the nation's colleges and universities, students acquire new skills and new perspectives that make them better workers, life partners, and citizens [Hout 2012, 395-396].

From a larger perspective, Harvey posits demanding criteria for changes to current practices regarding neoliberal dominance. He says, "...the market can do little to transform an economy without a parallel shift in class relations, private property, and all the other institutional arrangements that typically ground a thriving capitalist economy" (2005, 122). Appropriately, this sentiment is not far from reality, as "the current funding approach of replacing state appropriations with tuition revenues will...[lead] to lower success rates among all students and [widen] gaps between students from different socioeconomic backgrounds" (Mulhern et. al., 2014:63). Duke University Professor Cathy Davidson laments, "A college education is no longer the key to mobility but, given the reductions in funding and increasing student debt, more and more the index of an unequal society" (2013:10). In this way, the symbol of the diploma creates the boundary that distinguishes those with, and without, 'cultural capital'. As institutions seek to provide the 'cultural capital' desired by students, the journey toward graduation becomes exceedingly fraught with bureaucracy and political and national surveillance as

professors are required to instill increasingly standardized ‘performance’ measures and arbitrary goals for the appeasement of external controllers.

Harvey’s calls for economic, political, and social justice can be tied to education practices in many ways. For instance, Harvey states “The main substantive achievement of neoliberalism...has been to redistribute, rather than to generate, wealth and income...By this I mean the continuation and proliferation of accumulation practices” (2005, 159). This systematic redistribution of wealth and income may be directly tied to the reduction in funding for education, whereby public funding is redistributed to other areas of the government, and institutions subsequently must source their funding from other venues, including students’ tuition and entrepreneurial ventures. The challenge to secure funding has perpetuated the industrialization and commodification of higher education in its entrepreneurial efforts as a means of survival.

#### Expectations for the Future

Can higher education still be beneficial for students outside the marketplace? Davidson observes, “Right now, in MOOCs [massive open online courses] and in our brick-and-mortar classrooms, we’re mostly doing a good job preparing students for the industrial age labor market – not to be engaged and resilient contributors in a global, connected world” (2013:11). The inevitable questions of relevance must surface in discussing the future of higher education. Determining what higher education should be achieving, accomplishing, producing, or otherwise creating may not be best addressed through the use of standardized controls and bureaucratic processes. As long as these processes are in place, however, it seems that the educative processes of institutions of

higher education will continue to struggle to find meaningful relevance in the world today.

Perhaps an ideological goal provides an alternative to the ideology of the myth of accreditation. Regarding the purpose of higher education, Davidson recommends, “our goal should be to help train engaged, enlightened citizens who can make informed decisions and take collective action at the ballot box or in the streets about, say, gang rape in Delhi or assuaging hunger in Darfur or curtailing gun violence in elementary schools in Connecticut” (2013:9). Whether these goals are measurable, or whether they can be associated with educative (or economic) “quality” will remain in question as long as the myth of accreditation is supported and produced.

My goals in discussing accreditation as a cultural myth are not intended to imply that accreditation is inherently negative or that it is necessarily false. Rather, my intent has been to reasonably consider the impacts of federal and state involvement in making valuations of “quality education” in higher education. As this type of oversight is imbued with political discourses, national ideologies, and a neoliberal narrative, a central question remains: Are these influences desirable, or beneficial, for higher education and the students it is supposed to serve? Perhaps measures such as graduation rates, employment rates, standardized test scores, ‘institutional effectiveness’, and ‘measurable student learning’ are not the best (or only) ways to understand the complex and variable processes of learning in our institutions of higher education. Alternative paradigms might usefully include assessment practices created and conducted by the students and faculty, assessment that serves its internal constituents rather than external auditors. Rather than

putting institutions against one another in the race for accreditation, funding, and recognition, we may benefit from considering the ways in which communities and individuals are served by institutions of higher education – the areas that are less ‘measurable’. Removing the symbolized barrier between “accredited” and “unaccredited” institutions of higher education as an indicator of quality just might result in the self-governance, and access, that higher education seeks to achieve.

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