ELAINE EL-KHAWAS

THE PUSH FOR ACCOUNTABILITY: POLICY INFLUENCES AND ACTORS IN AMERICAN HIGHER EDUCATION

1. INTRODUCTION

Policy making for higher education in the United States poses a challenge for scholars seeking to develop coherent theories of the policy process. Under the federal system of American government, decisions over education matters are allocated to the individual states (Gladieux and Wolanin 1976; McGuinness 1981). Consequently, no single governmental body has jurisdiction over the 3000 universities and colleges located throughout the US. Historically, when the federal government exercised authority over higher education, it acted primarily on matters that have a clear interstate significance, for example, environmental and employment law, the nation-wide sponsorship of funding for scientific research, or the provision of student financial assistance that is 'portable' across the entire United States (Graham 1984; Wellman 2003).

Most universities and colleges in the US, therefore, are affected by multiple levels of policy governance. For public universities, state-level policy processes are of greatest importance. Traditionally, state legislatures and state agencies have primarily paid attention to financing and governance matters, while occasionally considering issues of institutional mission or the number and type of institutions that are needed. By and large, they did not extend their oversight into academic decisions on curriculum, academic hiring and graduation requirements (Hines 2000).

The last two decades have witnessed a trend toward a more active state role, with states pressing higher education institutions for greater accountability. These policy actions, which have dramatically altered the interaction between the state and higher education, are the basis for this analysis of policy implementation, US-style. This account, covering a twenty-year period and many different policy actions, is necessarily abbreviated. The objective has been to sketch the major outlines of the story of how accountability policies developed, recognising that many details cannot be covered.

From the perspective of policy theory, the analysis illustrates a pattern of policy development and subsequent modification, with evidence of significant impact. It describes a record of decades-long pressure by state policy makers, but also documents actions by several non-governmental policy actors. The analysis is thus

Å. Gornitzka et al. (eds.), Reform and Change in Higher Education, 287-304.

consistent with the recent interest in investigating policy making that involves multiple policy actors (Enders, Goedegebuure and Maassen 2003).

Section 2 offers a largely chronological description of policy formation and implementation related to higher education accountability during the last two decades. It specifically covers the trend toward using state-level performance indicators to monitor institutions of higher education, one of the major policy developments of the time in the US. Section 3 extends the narrative by assessing the contributions of each major policy actor. It also considers several contextual factors that influenced their actions. The analysis supports the recent arguments about policy theory that emphasise the importance of understanding advocacy networks and mutual influence patterns in implementation (Sabatier 1986; Sabatier and Jenkins-Smith 1999; Gornitzka, Kyvik and Stensaker 2002).

2. ORIGINS AND OBJECTIVES

In the early 1980s, a fundamental shift in the relationship between the state and higher education began to take form in the United States. State officials raised questions of institutional accountability by criticising low graduation rates for many collegiate programmes and by arguing that universities and colleges had inadequate concern for improving student achievement (Ewell 1985; Spangehl 1987). Several states initiated studies of higher education and many imposed new requirements on public institutions (Ewell 1993; Newman 1987; Gaither, Nedwek and Neal 1994).

Several governors took the lead in setting out new expectations. This shift can be seen in the speeches of a number of governors (Hines 1988; Krotseng 1990a) and in a 1986 report issued by the National Governors Association (NGA), titled *Time for Results*. This report, although mainly directed to NGA's campaign for reforms in elementary and secondary education, included a chapter on higher education that pointed to low performance and called for new standards of quality. Higher education was, for the first time, being scrutinised by public authorities for low performance. As Thomas Kean, then governor of New Jersey, stated:

> your critics … say that higher education promises much and delivers too little … They say your graduates can't write clearly or think straight. And they say you dare not assess your work, evaluate your product, or validate your claims (1987: 11).

As the report's title made clear, the governors expected results. NGA announced that it would issue yearly updates assessing progress with university efforts to improve performance. In 1989, governors joined with President George H.W. Bush in a highly publicised Education Summit that added further momentum toward education reform.

New initiatives were launched in a number of states (Newman 1987). Although varying in approach, they had a common goal: to raise student performance and achievement (Ewell and Boyer 1988). Implementing this new mandate often began with action by governors. In Missouri, for example, the governor took a personal approach. He invited university and college presidents to a meeting where he outlined improvement goals and told them to develop ways to meet these goals. During this period, many states followed this approach of not being specific but

asking colleges and universities to develop new assessments (Hutchings and Marchese 1990).

Other states decided to develop achievement tests for college-level students (Banta and associates 1993; Gaither, Nedwek and Neal 1994). Georgia had already established its Regents Rising Junior Examination, focused on writing skills. In 1982, Florida introduced academic skills tests directed to 'rising juniors'. South Dakota developed its Higher Education Assessment Program, while Texas established an Assessment of Basic Skills (Ashworth 1994). New Jersey began developing an achievement test for students completing degree programmes (Jemmott and Morante 1993).

Tennessee took another approach, based on incentives. In 1982, it required that universities and colleges report their yearly performance on student completion and several other outcomes. Those with good results would receive additional funding (Bogue and Brown 1982; Banta and Fisher 1984; Bogue 2003). Other states also developed various incentive-based approaches during the early 1980s (Newman 1987).

By the early 1990s, a new phase in higher education accountability emerged (Ewell 1993; Gaither, Nedwek and Neal 1994). Most testing approaches were dropped, due both to funding difficulties and to controversies over test implementation. The emphasis on student assessment, and allowing universities to develop their own approaches, also lost favour. Instead, states began to adopt policies that required institutional reporting on student outcomes such as degree completion and graduate employment. Arkansas, Missouri and Ohio adopted information-reporting approaches during this time, after having examined Tennessee's experience (El-Khawas 1998). South Carolina and Virginia adopted 'report cards' on effectiveness during this period (Gaither, Nedwek and Neal 1994).

Compared to the earlier, generalised calls for attention to student assessment, this new generation of policies was targeted: definitions were spelled out for a common set of indicators, deadlines were established and state uses of the reports were formalised. Yearly progress was expected, and the use of multiple indicators put greater pressure on institutions to improve in several areas (Christal 1998; Ruppert 1994; Banta et al. 1996).

By 1992, two-thirds of the states required universities and colleges to report on their performance (Christal 1998; Burke and Serban 1998). In 1994, the Education Commission of the States issued a report with case studies of how ten states used performance indicators, with additional information on other states (Ruppert 1994).

Greater information disclosure occurred as a consequence of this move toward performance indicators. Traditionally, states had issued reports on higher education that only listed such information as enrolments, degrees awarded and the year an institution was established. Now, with information-reporting, many states began to issue detailed yearly reports on higher education. As a sign of how much state policy environments had changed, this detailed reporting was largely uncontested when introduced. A related factor, perhaps, had been the publication of annual college rankings by commercial news magazines, which began in 1983 and was widely debated in subsequent years (Rating the Colleges 1983; Bogue 2003).

Today, most states issue such reports. Directed to high schools, to the news media and to the general public, these reports typically include 'scores' on the performance of each public university and college (Bogue 2003; Schmidt 2002a). In December 2000, a policy centre extended this information-disclosure approach with what they called a report card for the states. Their report, called *Measuring Up*, assigned a letter grade (A to F) for each state's performance in five policy areas relevant to higher education: preparation for college study, participation rates, affordability, degree completion and benefits (National Center for Public Policy and Education 2000). An update was issued in 2002, part of the policy centre's strategy of keeping the policy debate focused on accountability in these five areas (National Center for Public Policy and Education 2002).

Another shift in the state approach to accountability became evident by the late 1990s. Many states moved toward a policy called performance funding (Burke and Serban 1998). Under these policies, states linked the yearly reports on performance to the state's process for allocating core funding. They also added financial sanctions: institutions could lose funds if they showed poor performance. This new approach was a logical progression from earlier state policies but it was influenced, too, by a trend toward performance-based financing for all public agencies (Osborne and Gaebler 1993).

Missouri was one of the first states to adopt this approach. Its performance-funding policy, begun in 1996, used several performance indicators (e.g. performance of graduates on national tests in their field; the number of degrees awarded in high-demand occupations; academic success of first-year students) and added about 2 per cent of state funding for institutions showing progress (Schmidt 2002b). South Carolina passed a similar policy in 1996, initially planning to base 100 per cent of an institution's funding on its performance on 37 different measures (Burke and associates 2002). Later, amidst problems with individual measures, this policy was scaled back so that 14 measures could affect 3 per cent of funds (South Carolina Commission on Higher Education 2001).

The trend toward performance funding spread quickly. In 1997, ten states had some form of performance funding (Burke and Serban 1998). By 2002, five years later, 36 states had performance-financing systems (Burke and associates 2002). Although approaches varied, most performance-funding policies linked performance data to funding on an agreed-upon formula. Other states, in an approach called performance budgeting, took performance measures into account during budget determinations, but not with a formula. Still other states set aside incentive funds tied to specific goals. In general, states used a small number of performance indicators to control about 3 per cent of state funding (Burke and associates 2002).

This chronology outlines the general story of policies to increase higher education accountability over the last two decades. Additional actions fill out this narrative, including actions of accrediting agencies, universities, independent policy groups and the federal government. The analysis turns to these developments.

Although most policy change centred in the states, the federal government was also active. Several new federal policies on accountability emerged. Some were tied to the use of federal funds for research, but others were linked to how universities and colleges administered US programmes of student financial aid. A federal

advisory board sets criteria for and approves the accrediting agencies that can accredit institutions for federal purposes (Chambers 1983). In 1992, the US expanded this board's role (Gaither, Nedwek and Neal 1994; Wellman 2003) and assigned stricter requirements to accrediting agencies on institutional integrity and good performance. In 1998, they added further requirements on institutional monitoring of student progress and learning (Wellman 2003; Kezar and El-Khawas 2003).

The federal government also introduced an ambitious state-based policy for achieving accountability. In 1992 a new US law required each state to create State Postsecondary Review Entities (SPRE), a structure to monitor institutional operations on statistical indicators related to the proper management of student aid funds. If certain 'triggering' conditions were found, the state was required to conduct an in-depth visit and review of the institution (McGuinness 1999). By 1994, however, the US Congress had a change of heart and dropped all funding for the effort, effectively killing it (Wellman 2003).

Accrediting agencies are an important part of this accountability story. In the United States, a network of regional accreditation agencies, covering all US states, conducts evaluative reviews that provide quality assurance in higher education (Bemis 1983; Eaton 2003). More than 60 programme accrediting agencies review specific academic disciplines, especially programmes that prepare students for professions such as medicine, law, nursing and engineering (Glidden 1983).

During the 1980s and 1990s, as accountability policies were developing at the state level, accrediting agencies exerted independent pressure on institutions of higher education to improve performance and quality (Eaton 2001; Ewell 1993). Their objectives were similar, as they also focused on student progress and achievement.

The implementing mechanisms differed, however (Thrash 1988). Regional accrediting agencies required universities to conduct research and evaluation on 'student assessment' and 'student outcomes'. The primary purpose was for universities to use the research evidence in their own efforts to improve programmes (Ewell 1993; Thrash 1988).

This new emphasis on student 'outcomes' departed significantly from earlier accreditation procedures, which had been criticised for considering 'inputs' rather than outcomes (Dill, Massy, Williams and Cook 1996). Regional accreditation agencies introduced these requirements over several years, often revising them several times (Stanley and Patrick 1998; El-Khawas 2001).

The Southern Association of Colleges and Schools (SACS) was the first accrediting agency to act. In 1984, it adopted a new requirement on institutional effectiveness, requiring institutions to evaluate their success and use the results for planning and improvement (Bogue 2003). Other regional accrediting agencies followed with their own approaches. In 1990, the North Central Association (NCA) identified student achievement as a critical component in institutional effectiveness and, in 2000, it announced an Academic Quality Improvement Project (North Central Association 2000). At present, all of the regional accrediting agencies base their reviews on issues of student achievement and learning (Bogue 2003).

Programme-focused accrediting agencies also implemented accountability requirements. Several agencies – in business, engineering, nursing, physical therapy and architecture, for example – transformed their entire programme of study as well as accrediting requirements into a competency-based approach to student achievement (El-Khawas 1993). Under this approach, universities had to demonstrate that students completing their programmes met specific performance standards on the competencies deemed necessary for professional conduct.

Universities also were important policy actors on accountability. Separately and collectively, they actively worked to shape state policy and how state policies were implemented (Bogue 2003; Ewell 1993). In the early period, when governors and state agencies were introducing new calls for student achievement, universities often lauded the objectives but criticised details. They pointed to the difficulties of timely reporting and documenting student progress. Many complained that the states had unilaterally set new policies, disregarding the expertise of university officials (Hutchings and Marchese 1990). These arguments had some effect. Many states developed advisory mechanisms for accountability that included university representatives (Krotseng 1990b). These advisory groups helped shape the actual procedures that implemented performance indicator systems (Spangehl 1987; Banta et al. 1996).

Several policy-focused organisations were also active on accountability. Most had long histories of influencing policy developments affecting higher education. With respect to accountability, there were two subsets of active groups: those interested in improving state policy, and others primarily interested in improving practices within universities and colleges.

Several associations of universities and colleges were active, especially during the initial debates. The American Association of State Colleges and Universities (AASCU), for example, organised a special commission and issued a report with accountability recommendations (AASCU 1986). The Association of American Colleges issued a report (AAC 1985) emphasising the curricular issues in undertaking reform. The American Association for Higher Education (AAHE) was especially influential in helping to define the issues and the type of university responses that were appropriate. AAHE organised its first national conference on assessment in 1984 and has sponsored annual assessment conferences since then. AAHE also issued numerous reports and commentaries by respected experts on assessment. Its magazine, *Change,* became a must-read for those following accountability developments.

State-oriented policy organisations were also part of the accountability debate. Organisations pressing for vigorous state action during this period include inter state organisations such as the Education Commission of the States (ECS) and the State Higher Education Executive Officers (SHEEO). These groups issued reports, sponsored conferences and took other actions to spur accountability at the state level (Gaither, Nedwek and Neal 1994; ECS 1986).

By now, almost twenty years of US policy efforts have been directed toward the policy goal of making universities and colleges more accountable. What evidence is there on the impact of the varied efforts, by states and by other actors? Have these new policy initiatives brought lasting changes in state and university actions?

Answering such questions is difficult when many states and thousands of universities and colleges are involved, and when most state policies changed, sometimes dramatically, over this extended period. Realistically, too, any impact is likely to be indirect, especially when the policies allowed for local variation in how mandates are met (Ewell 1993).

Some perspective can be gained from reports on the extent of change that occurred:

- *State requirements for assessment*. By 1990, forty states had a policy that actively promoted assessment (Ewell, Finney and Lenth 1990). In 1992, more than 90 per cent of public universities reported that they faced requirements for state-mandated student assessment (El-Khawas 1992).
- *Accrediting requirements for assessment*. By the early 1990s, all six regional accrediting agencies had requirements that universities and colleges conduct assessment of student learning and outcomes, and use their assessment results to improve programmes (Ewell 1993).
- *Information reporting*. In 1992, thirty-nine states issued periodic reports to the public about the performance of the state's colleges and universities (Bogue 2003).
- *Performance financing*. In 2002, thirty-six states had performance-financing systems in which some portion of state funds was linked to statistical assessments of the performance of public colleges and universities. In 1997, only ten states had performance-financing systems (Burke and associates 2002).

This evidence documents major change in what states and accreditors require of universities and, in turn, a significant shift in how universities and colleges relate to such external bodies. All universities and colleges are now expected to offer explicit information about student assessment and learning to accreditors; most public universities and colleges must report such information to state agencies and, in most states, new fiscal consequences are attached to weak performance. This adds up to a substantial change in long-held 'rules of the game' with respect to higher education and the state. Back in 1980, none of these requirements was in place (Ewell 1993). Pertinent too is that compliance with (and acceptance of) the new rules is widespread. Most observers believe that public universities and colleges have become comfortable with these new policies (Bogue 2003; Gaither, Nedwek and Neal 1994).

However, there is little evidence of any systematic educational gains, and procedures for measuring performance remain contentious (Lingenfelter 2003; Schmidt 2002a). State agencies have achieved a system for pushing public universities and colleges to improve in specific areas, such as graduation and retention. These are useful, but they are less ambitious than original objectives. As the current head of SHEEO acknowledged: "… progress has been slow, both in developing satisfactory approaches and in improving performance" (Lingenfelter 2003: 20).

A broader perspective can also be taken. Aaron Wildavsky, in his classic book on *Speaking Truth to Power* (1979), offered a criterion for judging broad-scale policy initiatives. His question was whether different problems were being addressed after policies were in place, compared to before. On this criterion, it seems safe to say that the policy arena for higher education has been transformed over the last twenty years as a result of the push for accountability. New questions are raised about quality and accountability in higher education and sharper understandings of underlying problems have been achieved. Public universities and colleges face a different reality: they must comply with performance reporting on several indicators and, for most, state agencies link their performance to funding. Many state officials believe that, because of accountability policies, public universities and colleges today give more attention to state needs (Schmidt 2002a). This represents a significant change from the 1980s, when accusations abounded (Newman 1987) that public universities failed to take state needs seriously (Krotseng 1990b).

So too, the state role with respect to higher education has been transformed. Twenty years ago, states generally did not have the capacity to operate performance-based reporting systems, nor were such systems seen as appropriate for higher education; today, higher education agencies have talented staff, systems are in place, and their legitimacy is broadly accepted.

3. FACTORS AFFECTING IMPLEMENTATION

If state policies to increase higher education accountability have had some success, what accounts for this success? How can the shortcomings in implementation be understood? These questions are addressed by filling in key aspects of the policy context, including further analysis of the role of each major policy actor. Multiple policy actors – the states, the federal government, accrediting agencies, independent policy groups and universities and colleges themselves – influenced the implementation of higher education accountability measures during the last two decades (Ewell 1993; Marchese 1994).

The fact that policy implementation occurred primarily at the state level is advantageous for analysis of the policy process. It offers an appropriate setting, for example, for documenting the impact of contextual change, especially in economic conditions and in elected political leadership (Gaither, Nedwek and Neal 1994). Other contextual factors can also be identified, including shifts toward implementation modes that fit with state agency capabilities as well as shifts that responded to influence exerted by the state's universities and colleges (cf. Gornitzka, Kyvik and Stensaker 2002).

3.1. Factors Affecting State Actions

Accountability had an unusual origin compared to longstanding approaches to state policy making. Much of the impetus emerged from political agendas of several governors (Krotseng 1990a). During the early 1980s, these governors found that

taking a special interest in education was politically popular. Although they had first sought to reform elementary and secondary education, higher education offered a natural extension of their push for reform (Ewell 1993). This link also affected the goals the governors selected, because student achievement and outcomes testing already were goals for elementary and secondary education (Kean 1987; Bogue 2003).

This active gubernatorial role was unusual for higher education policy, which usually worked through state-wide boards, agency heads and a few legislators on education committees. The unusual 'origin' of the accountability policy partly explains why its goals moved beyond the traditional policy areas – funding, facilities, capital improvements, mission differentiation, etc. – that were familiar to state-level policy officials.

The capabilities of state agencies also influenced policy implementation. Although their resources and the sophistication of their staff have increased, most state agencies in the early 1980s had limited resources and a small staff, and operated under informal norms that defined their roles as administrative – to allocate funds, gather information and prepare reports – not as advocates of change (Bender 1983).

Once the accountability process got underway, with required performance data, state agencies confronted a greatly increased technical workload. Limited agency capacity may have been a factor in the willingness of states to agree to university pressure to simplify requirements (Ewell 1993) and also in the failed federal attempt to establish state postsecondary review entities. For most states, the federal law would have required a substantial build-up in their administrative capacity (McGuinness 1999).

Significantly, state agencies had strong networks, both formal and informal. Heads of state agencies were members of the SHEEO, which sponsors annual conferences, information-sharing and other supportive services. Many heads of state agencies also were members of regional compacts that bring agency heads together. The Southern Regional Education Board (SREB) has actively promoted improvement in education at all levels. Other informal opportunities – conferences, meetings, special projects – also brought state agency officials into contact with counterparts in other states.

As a result, extensive 'policy borrowing' among the states, both on overall policy and on implementation details, played an important role in accountability reforms (Albright 1997). Tennessee's experience as a pioneer on performance indicators was watched closely by other states, even though few adopted the model in the early years. Other state actions were widely discussed. South Carolina contacted other states as it planned its performance indicators system in the late 1990s. As reflected in the phrase 'legislation by fax', it often seemed that accountability policies in one state were adopted with little independent analysis by other states (Gaither, Nedwek and Neal 1994).

State agencies are vulnerable to shifting priorities, however, and the accountability agenda was subject to considerable 'policy volatility' within the states during this period (Burke and associates 2002). Changes in the states' financial picture were a major source of volatility. Fiscal problems led to cutbacks in higher

education funding in several states during the late 1980s and then again in the early 1990s (Hollander 1991; Gaither, Nedwek and Neal 1994). Some argue that these economic problems led to greater legislative interest in efficiency and productivity, which were added to the accountability agenda (Folger and Jones 1993).

For many states, legislatures often reversed gears or newly elected governors abandoned commitments made by previous governors. Arkansas initiated a policy on performance indicators in 1994, but dropped it in 1997. Kentucky started a performance funding policy in 1993, which was discontinued by the new governor in 1997. Similarly, the Minnesota legislature approved a performance funding policy in 1994 but suspended it in 1996. Missouri put its Funding for Results policy in place in 1994, but it was dismantled by a new governor facing budget problems in 2002 (Schmidt 2002c). Texas has discussed adopting several accountability policies but, each time, it has not moved forward (Ashworth 1994; Bogue 2003).

Central to the implementation process for accountability, consequently, was a substantial modification in procedures. State agencies had policy modifications imposed on them as economic or political circumstances changed. Also, they were open to change and regularly convened meetings to discuss procedures (Banta et al. 1996). Over the years, indicators, definitions and procedures changed, as did the funding consequences for good performance. This occurred even for states such as Tennessee, which kept a performance funding system in place continuously since 1982.

Universities and colleges actively pressed for changes, their approach varying by informal norms in each state (Hines 1988). Some states invited university representatives to discuss the new requirements and how to make them workable. Some states established advisory committees to air issues and work out implementation problems. In still other settings, issues were quietly discussed between individual presidents and state leaders.

3.2. Factors Affecting Federal Actions

The US government added its weight to the campaign to increase higher education accountability during the 1990s (Wellman 2003). This represented a departure from its earlier stance, in which the federal government limited its oversight, primarily focused on federal student aid programme (Graham 1984). This ‘limited’ scope became a substantial investment, however, as the aid programmes grew (Parsons 2000). Since the 1980s, about 40 per cent of all students each year receive federal student aid; the federal government spends close to $70 billion annually on its student grant and loan programmes. Aid recipients are dispersed throughout the US in 3000 colleges and universities but also in 14,000 other postsecondary institutions. The oversight task had become enormous.

The most visible federal action, legislation setting up State Postsecondary Review Entities, was a policy response to this genuine problem. Evidence had emerged of irregularities in how a small number of institutions managed student aid, and federal monitoring capabilities had been criticised for being slow to respond (McGuinness 1999). For beleaguered federal officials, new, state-level review

agencies offered a logical mechanism to detect, and punish, bad practice. However, these new agencies were seen by higher education and by some states as a harsh policing device that would affect all institutions, not just those with flawed management. As already noted, the US Congress dropped its support for SPREs after hearing heated opposition (Wellman 2003).

In policy perspective, these new agencies would have imposed a major structural change and would have established a substantially new relationship between the states and the federal government on higher education matters. It required an uncomfortable 'policing' role to monitor administrative details, to inspect institutions and to penalise them where infractions were found. Most states at the time were already heavily invested in developing their performance indicator systems. For many, resources were stretched thin.

More broadly, the SPRE legislation challenged general norms about the respective roles of the federal government and the states. Longstanding agreements had been in place for the states, the federal government and accrediting agencies to take shared responsibility for oversight of American universities and colleges. Referred to as the 'program integrity triad' and described in Part H of the federal Higher Education Act, this agreement allocated responsibilities to each that fitted with their special role and capabilities (Gaither, Nedwek and Neal 1994). States had sole authority to authorise, or license, a new institution to begin operation (Bender 1983). Accrediting agencies were responsible for assessing quality once an institution was underway. The federal government monitored that universities and colleges followed all fiscal and regulatory requirements tied to the student aid programme (Chambers 1983). This agreement was subject to change, of course, but the SPRE approach had introduced an abrupt, one-sided change.

The federal government also placed additional responsibility on accrediting agencies. As a policy instrument, this was easy to implement. Accrediting agencies, already responsible for monitoring the quality of universities and colleges, accepted the new requirements, in part to uphold their commitment to the 'triad' concept and in part, too, as a preferred alternative to greater federal scrutiny of universities and colleges (Eaton 2001, 2003).

3.3. The Influence of Accrediting Agencies

US accrediting agencies actively promoted accountability during these decades. Their focus – on institutional effectiveness, student outcomes and processes of student assessment – differed from the state focus on performance, but accreditors put similar pressure on institutions to improve student progress and study completion (Ewell 1993). States and accreditors also relied on similar policy tools, primarily requirements with deadlines and institutional reporting.

In a contrast to state actions, accrediting agencies moved slowly to revise and strengthen their requirements. They followed longstanding procedures, allowed lengthy periods for comment and discussion, and introduced new rules over time (Eaton 2001; El-Khawas 2001). One factor may be that accrediting agencies have relatively small staff and a limited mandate, focused on cycles of institutional

review. Another factor is their source of authority: while they serve a public purpose, they are voluntary organisations and depend on gaining acceptance for change. Unlike state agencies, accrediting agencies must build consensus, and obtain formal approval, before embarking on a reform (Thrash 1988; Stanley and Patrick 1998).

States and accreditors differed on approaches to accountability. States tended to rely on uniform criteria applied to all institutions and emphasised accountability over improvement. In contrast, accrediting agencies allowed performance to be defined according to institutional context, gave priority to self-review over uniform measures and, if pressed, emphasised improvement over accountability (Ewell 1993; Kezar and El-Khawas 2003).

The independent but complementary agendas of state agencies and accrediting agencies may have had a mutually reinforcing impact. For universities and colleges, the new accountability agenda was a strong departure from past practice, so institutions might have argued against it or adopted a wait-and-see approach, aware that many state policies do not last. Yet, the combined influence of both state and accrediting agency calls for accountability may have given a sense of inevitability to the push for change. Following initial questioning, most universities and colleges accepted the new calls for accountability from both states and accreditors (El-Khawas 1992).

3.4. Universities as Policy Actors

Universities have long been recognised as policy influentials at the state policy level (Hines 1988; Parsons 2000). In most states, a university president meets directly with state officials to discuss institutional needs. Many states have advisory committees of college presidents and most have boards (e.g. boards of trustees, boards of regents) that set policy and discuss institutional needs with state officials.

Although generalisation is difficult, university actions fell into several patterns as accountability policies developed. The initial response was largely rhetorical, expressing concern and pointing out shortcomings. A second phase was a pattern of university influence through consultation. State agencies, responding to criticism, opened their new procedures to discussion. Implementation difficulties were routinely aired and workable compromises identified, often resulting in weaker requirements (cf. Dill 1998). Tennessee, for example, made an early change from requiring a specific rate of degree completion each year to a new indicator calling for year-to-year progress on completion. Missouri's Funding for Results policy was designed with input from university and college leaders. As a result, it included a small number of indicators – more workable for institutions – and different indicators for two-year and four-year institutions. In another accommodation, state officials agreed that universities and colleges could receive additional money for good performance but would not face budget cuts for poor performance (Schmidt 2002b).

Few institutions openly 'resisted' accountability policies. Most took steps to comply with state requirements, expanding offices that gathered and reported

information, and improving programmes to achieve gains on required indicators. However, as several studies have found, compliance was primarily at the administrative level. Little change occurred in academic programmes and among faculty (Bogue 2003; Banta et al. 1996; El-Khawas 1998). Also, university leaders continued to question the new policies. State officials have said that much policy 'volatility' and their retreats from stricter policies were largely due to the political influence of universities (Schmidt 2002b; Ewell 1993).

An interesting variation in university response occurred among those universities that embraced the accountability agenda. Truman State University and others recognised that this approach offered them a distinctive role, or 'niche', and could enhance their national reputation. Such responses, reflecting a resource dependency view (Gornitzka, Kyvik and Stensaker 2002), can be expected in a differentiated system of higher education. Universities will vary in their estimates of whether new ideas are profitable for them. They also vary in their response to different inducements. Reputational or prestige gains can be powerful inducements to action.

3.5. Independent Policy Organisations

Voluntary organisations were also prominent, most with nation-wide constituencies and reputations. These organisations took on policy roles (e.g. identifying problems and defining possible solutions) that a national government might otherwise exercise (El-Khawas 1997). Their combined actions lent legitimacy to the entire accountability agenda.

As already noted, two policy groups were influential in the accountability debate. In many respects they operated as two advocacy coalitions trying to shape policy response (cf. Sabatier and Jenkins-Smith 1999). The state-focused groups included the Education Commission of the States, SHEEO, NCHEMS, regional groups such as SREB and WICHE (the Western Interstate Consortium in Higher Education), and, recently, the National Center for Public Policy in Higher Education. Their assistance provided technical advice and moral support to state policy makers.

The institution-focused groups also promoted change through conferences and reports, but their attention was directed primarily to colleges and universities. Their messages differed from the state-oriented groups, with less emphasis on performance indicators and greater emphasis on issues of student learning and student outcomes. These associations did not argue against change, however. Indeed, AAHE adopted a strong reformist agenda, cooperating with state-focused groups on many occasions. It offered a reasoned voice for change, and a forum in which campus practitioners could exchange information and gain advice on implementing state mandates (cf. Hutchings and Marchese 1990).

Arguably, AAHE's continuing reformist role influenced the actions of many institutions across the US. AAHE argued for student assessment over a sustained period and provided both intellectual arguments and practical advice to shape its implementation. Its policy stance probably enhanced acceptance of both state and accrediting agency requirements for student assessment. Although it was critical of much statistical reporting, AAHE lent overall legitimacy to accountability policies,

giving them an air of inevitability, and helped resolve operational issues that campuses faced in meeting state requirements.

4. CONCLUSION

US policy initiatives to promote higher education accountability have continued, albeit in differing forms, for two decades. They have had substantial impact. Today, state agencies, accrediting agencies and universities and colleges all operate with greater focus on accountability goals and have taken steps to enhance institutional quality and improve student learning.

One broad impact is that the external climate for higher education has changed. Following Wildavsky's questions, it is evident that different issues are on the table today, compared to two decades ago. Higher education pays greater attention to its external publics. Accountability issues are seen as legitimate objects of external attention. Considered in light of the longstanding tensions between academic and governmental values, this change in cultural assumptions is significant (cf. Gornitzka, Kyvik and Stensaker 2002).

Notably, it was the actions of multiple policy actors that created change. A 'cumulative effect' occurred, as individual groups and sectors collectively sustained the accountability effort (Ewell 1993). If states had taken the only policy action on accountability, the volatility and reversals that occur within state policy may have doomed the effort. The states gained support – and protection – from the parallel messages sent out by other states, by the federal government, by accreditors and by independent policy organisations.

This study offers several implications for further research on policy implementation. First, other studies are needed that look to multiple sources of policy influence in order to better discern the basis for survival of new policies. If this study had focused only on the state role, it would have missed the larger story of why the state policies were not opposed and, especially, why the university sector adapted to the new requirements. Similar studies are needed on different issues, in various settings.

Second, this study, by spanning two decades, helps demonstrate the important role of policy volatility. Further research should explore such volatility, perhaps documenting correlates of certain policy directions (e.g. more interventionist or more technical) with broader social and economic trends. The role of various actors in causing, or resisting, policy volatility also bears attention. Is there systematic support for the belief that newly elected or appointed officials typically introduce major policy shifts to put their own stamp on policy? How do the actions of long-term officials, elected or appointed, affect the continuity of policy initiatives?

Third, this study raises the question of how 'policy' should be defined. Is policy to be seen as a specific law or agency directive or, instead, as a sustained initiative? If the latter, how can a sustained effort be identified? If the focus is on governmental initiatives, should attention be limited to a single administrative term? Might it be tied to a particular issue, or location, or to the sustained efforts of a few actors? This study's focus on accountability at the state level was not limited to a specific state

law or agency directive in order to show the effects of several, related initiatives on higher education institutions throughout the United States. Other policy research may also find it fruitful to examine a sustained, but decentralised, policy initiative. We need to understand better the ways in which such long-term policy initiatives are mounted, even as key actors change, venues shift and objectives change.

REFERENCES

Albright, B.N. "Of Carrots and Sticks and State Budgets." *Trusteeship: The Journal of the Association of Governing Boards of Colleges and Universities*. March/April (1997): 18–23.

American Association of State Colleges and Universities. *To Secure the Blessings of Liberty: Report of the National Commission on the Role and Future of State Colleges and Universities.* Washington, DC: AASCU, 1986.

Ashworth, K.H. "Performance-based Funding in Higher Education: The Texas Case Study." *Change* 26.6 (1994): 8–15.

Association of American Colleges. *Integrity in the College Curriculum.* Washington, DC: AAC, 1985.

Banta, T.W. and associates (eds). *Making a Difference: Outcomes of a Decade of Assessment in Higher Education.* San Francisco: Jossey-Bass, 1993.

Banta, T.W. and H.S. Fisher. "Performance Funding: Tennessee's Experiment." In Folger, J. (ed.). *Financial Incentives for Academic Quality.* New Directions for Higher Education. San Francisco: Jossey-Bass, 1984, 29–41.

Banta, T.W., L.B. Rudolph, J. van Dyke and H.S. Fisher. "Performance Funding Comes of Age in Tennessee." *Journal of Higher Education* 67.1 (1996): 23–45.

Bemis, J.F. "Regional Accreditation." In Young, K.E., C.M. Chambers, H.R. Kells and associates (eds). *Understanding Accreditation.* San Francisco: Jossey-Bass, 1983, 167–186.

Bender, L.W. "States and Accreditation." In Young, K.E., C.M. Chambers, H.R. Kells and associates (eds). *Understanding Accreditation.* San Francisco: Jossey-Bass, 1983, 270–288.

Bogue, E.G. *Quality and Accountability in Higher Education: Improving Policy, Enhancing Performance.* Westport, CT: Praeger, 2003.

Bogue, E.G. and W. Brown. "Performance Incentives for State Colleges." *Harvard Business Review* 60.6 (1982): 123–128.

Burke, J. and associates. *Funding Public Colleges and Universities for Performance*. Albany: The Rockefeller Institute Press, 2002.

Burke, J.C. and A.M. Serban. *Performance Funding for Public Higher Education: Fad or Trend?* New Directions for Institutional Research, No. 97. San Francisco: Jossey-Bass, 1998.

Chambers, C.M. "Federal Government and Accreditation." In Young, K.E., C.M. Chambers, H.R. Kells and associates (eds). *Understanding Accreditation.* San Francisco: Jossey-Bass, 1983, 233–269.

Christal, M.E. *1997 Survey on Performance Measures*. Denver: State Higher Education Executive Officers, 1998.

Dill, D.D. "Evaluating the Evaluative State: Implications for Research in Higher Education." *European Journal of Education* 33.3 (1998): 361–377.

Dill, D.D., W.F. Massy, P.R. Williams and C.M. Cook. "Accreditation and Academic Quality Assurance: Can We Get There From Here?" *Change* 28.5 (1996): 16–24.

Eaton, J. "Regional Accreditation Reform: Who is Served?" *Change* 33.2 (2001): 38–45.

Eaton, J. "The Value of Accreditation: Four Pivotal Roles." Washington, DC: Council for Higher Education Accreditation, 2003.

Education Commission of the States. *Transforming the State Role in Improving Undergraduate Education: Time for a Different View.* Denver, CO: ECS, 1986.

El-Khawas, E. *Campus Trends 1992.* Washington, DC: American Council on Education, 1992.

El-Khawas, E. "External Scrutiny, US Style: Multiple Actors, Overlapping Roles." In Becher, T. (ed.). *Governments and Professional Education*. London: SRHE/Open University Press, 1993, 107–122.

El-Khawas, E. "The Role of Intermediary Organizations." In Peterson, M.W., D.D. Dill and L.A. Mets (eds). *Planning and Management for a Changing Environment.* San Francisco: Jossey-Bass, 1997, 66–87.

El-Khawas, E. "Strong State Action But Limited Results: Perspectives on University Resistance." *European Journal of Education* 33.3 (1998): 317–330.

El-Khawas, E. *Accreditation in the United States: Origins, Development, and Future Prospects.* Paris: UNESCO/International Institute for Educational Planning, 2001.

Enders, J., L. Goedegebuure and P. Maassen. *Governance Shifts and Policy Implementation in Higher Education: A European Birds-Eye View.* Enschede, the Netherlands: Center for Higher Education Policy Studies, 2003.

Ewell, P.T. "Assessment: What's it all About?" *Change* 17.6 (1985): 32–36.

Ewell, P.T. "The Role of States and Accreditors in Shaping Assessment Practice." In Banta, T.W. and associates (eds). *Making a Difference: Outcomes of a Decade of Assessment in Higher Education.* San Francisco: Jossey-Bass, 1993, 339–356.

Ewell, P.T. and C.M. Boyer. "Acting Out State-Mandated Assessment: Evidence From Five States." *Change* 20.4 (1988): 40–47.

Ewell, P.T., J. Finney and C. Lenth. "Filling in the Mosaic: The Emerging Pattern of State-Based Assessment." *AAHE Bulletin* 42.8 (1990): 3–5.

Folger, J. and D. Jones. *Using Fiscal Policy to Achieve State Education Goals: State Policy and College Learning.* Denver: Education Commission of the States, 1993.

Gaither, G., B.P. Nedwek and J.E. Neal. *Measuring Up: The Promise of Performance Indicators in Higher Education.* ASHE/ERIC Research Report. Washington, DC: George Washington University, 1994.

Gladieux, L.E. and T.R. Wolanin. *Congress and the Colleges.* Lexington, MA: D.C. Heath, 1976.

Glidden, R. "Specialized Accreditation." In Young, K.E., C.M. Chambers, H.R. Kells and associates (eds). *Understanding Accreditation.* San Francisco: Jossey-Bass, 1983, 187–208.

Gornitzka, A., S. Kyvik and B. Stensaker. "Implementation Analysis in Higher Education." In Smart, J.C. (ed.). *Higher Education: Handbook of Theory and Research, vol. XVII*. Dordrecht: Kluwer Academic Publishers*,* 2002, 381–423.

Graham, H.D. *The Uncertain Triumph: Federal Education Policy in the Kennedy and Johnson Years.* Chapel Hill: University of North Carolina Press, 1984.

Hines, E.R. *Higher Education and State Governments: Renewed Partnership, Cooperation or Competition?* ASHE/ERIC Higher Education Report. Washington, DC: George Washington University, 1988.

Hines, E.R. "The Governance of Higher Education." In Smart, J.C. and W.G. Tierney (eds). *Higher Education: Handbook of Theory and Research, vol. XV*. New York: Agathon Press, 2000, 105–156.

Hollander, T.E. "States and College Reform: New Jersey's Experiment." *Planning in Higher Education* 19 (1991): 25–31.

Hutchings, P. and T. Marchese. "Watching Assessment: Questions, Stories, Prospects." *Change* 22.4 (1990): 12–38.

Jemmott, N.D. and E.A. Morante. "The College Outcomes Evaluation Program." In Banta, T.W. and associates (eds). *Making a Difference: Outcomes of a Decade of Assessment in Higher Education.* San Francisco: Jossey-Bass, 1993, 306–321.

Kean, T. "Time to Deliver: Before We Forget the Promises We Made." *Change* 19.5 (1987): 10–11.

Kezar, A. and E. El-Khawas. "Using the Performance Dimension: Converging Paths for External Accountability?" In Eggins, H. (ed.). *Globalization and Reform in Higher Education.* London: SRHE/Open University Press, 2003, 85–99.

Krotseng, M. "Of State Capitals and Catalysts: The Power of External Prodding." In Marcus, L.R. and B.D. Stickney (eds). *Politics and Policy in the Age of Education.* Springfield, IL: Charles C. Thomas, 1990a, 243–262.

Krotseng, M. "Profiles of Quality and Intrusion: The Complex Courtship of State Governments and Higher Education." *Review of Higher Education* 13.4 (1990b): 557–566.

Lingenfelter, P.E. "Educational Accountability: Setting Standards, Improving Performance." *Change* 35.2 (2003): 19–23.

Marchese, T. "Accountability." *Change* 26.6 (1994): 4.

McGuinness, A.C. "The Federal Government and Postsecondary Education." In Altbach, P.G. and R.O. Berdahl (eds). *Higher Education in American Society*. Buffalo: Prometheus Books, 1981, 157–179.

McGuinness, A.C. *Federal/State Partnerships in Postsecondary Education: SPRE as a Case Study.* Boulder, CO: NCHEMS, 1999.

National Center for Public Policy and Higher Education. *Measuring up 2000.* San Jose, CA: National Center for Public Policy and Higher Education, 2000.

National Center for Public Policy and Higher Education. *Measuring up 2002.* San Jose, CA: National Center for Public Policy and Higher Education, 2002.

National Governors Association. *Time for Results.* Washington, DC: National Governors Association, 1986.

Newman, F. *Choosing Quality: Reducing Conflict Between the State and the University.* Denver, CO: Education Commission of the States, 1987.

North Central Association. "Academic Quality Improvement Project." Revised. Chicago, IL: North Central Association, 2000.

Osborne, D. and T. Gaebler. *Reinventing Government: How the Entrepreneurial Spirit is Transforming the Public Sector.* New York: Penguin Books, 1993.

Parsons, M.D. "The Higher Education Policy Arena: The Rise and Fall of a Community." In Losco, J. and B.L. Fife (eds). *Higher Education in Transition: The Challenges of the New Millennium.* Westport, CT: Dergin and Garvey, 2000, 83–107.

Rating the Colleges. *US News and World Report,* 28 November, 1983, 41.

Ruppert, S.S. (ed.). *Charting Higher Education Accountability: A Sourcebook on State-Level Performance Indicators.* Denver, CO: Education Commission of the States, 1994.

Sabatier, P.A. "Top-down and Bottom-up Approaches to Implementation Research: A Critical Analysis and Suggested Synthesis." *Journal of Public Policy* 6 (1986): 21–48.

Sabatier, P.A. and H.C. Jenkins-Smith. "The Advocacy Coalition Framework: An Assessment." In Sabatier, P.A. (ed.). *Theories of the Policy Process.* Boulder, CO: Westview Press, 1999, 117–168.

Schmidt, P. "Most States Tie Aid to Performance Despite Little Proof That it Works." *Chronicle of Higher Education*, 22 February, 2002a, A20.

Schmidt, P. "Missouri's Financing System is Praised, But More for Longevity Than for Results." *Chronicle of Higher Education*, 22 February, 2002b, A21.

Schmidt, P. "Dashed Hopes in Missouri." *Chronicle of Higher Education*, 29 November, 2002c, A18.

South Carolina Commission on Higher Education. *Performance Funding at a Glance.* Columbia, SC: South Carolina Commission on Higher Education, 2001.

Spangehl, S.D. "The Push to Assess: Why it's Feared and How to Respond." *Change* 19.1 (1987): 35–39.

Stanley, E. and W. Patrick. *Quality Assurance in American and British Higher Education: A Comparison.* New Directions for Institutional Research, No. 99. San Francisco: Jossey-Bass, 1998.

Thrash, P.A. "Educational Outcomes in the Accrediting Process." *Academe* 74 (1988): 16–18.

Wellman, J. "Do Federal Spending and Regulation Produce Quality in Higher Education?" In Wolanin, T.R. (ed.). *Reauthorizing the Higher Education Act: Issues and Options.* Washington, DC: Institute for Higher Education Policy, 2003, 129–146.

Wildavsky, A. *Speaking Truth to Power: The Art and Craft of Policy Analysis.* Boston: Little, Brown, 1979.