PERCEPTION SHIFTS: ENHANCING THE EVALUATION OF UNACCREDITED POSTSECONDARY INSTITUTIONS

by

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(Under the Direction of Karen Watkins, Ph.D.)

Abstract

Within the field of higher education assessment, one area often overlooked is the evaluation of unaccredited postsecondary institutions. This group of institutions is unique, as they are not regulated by a federal agency due to their exclusion from the Higher Education Act of 1965 and its amendments. Because of this, unaccredited institutions are ineligible for federal student aid and thus often under the radar of regulators and lawmakers alike. Although excepted from federal laws, states can permit unaccredited postsecondary institutions to operate in individual states and, in some states, they are not required to obtain accreditation. This creates a gap in oversight as guidelines are at the discretion of state oversight, which vary along with the associated evaluation practices.

At regulatory state agencies responsible for oversight of private postsecondary institutions, evaluators are tasked with completing periodic external assessments of institutions that offer education at any level beyond secondary (i.e. high school). This review requires an understanding of institutional operations and educational programming and an ability to apply this knowledge in a compliance evaluation. Given the complexity of higher education evaluation, with competing internal interests and various layers of external regulatory oversight,

it is important for state evaluators to periodically examine their own practices to ensure validity and applicability. The purpose of this action research case study was to utilize Stufflebeam's (1971) Context Input Process and Product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The study found that the CIPP Model is a useful tool for expanding and enhancing the evaluation process of unaccredited postsecondary institutions. This was due to the model's ability to identify systematic components that had previously been excluded from review. Furthermore, and most critically, the study identified that perception is key to quality improvement efforts. In order to effectively plan for and assess changes, efforts should be made by the evaluator to both recognize the perceptions held by both itself, as an individual and a system, and those held by the evaluated. The process of acknowledging perceptions helps to identify biases and assumptions that may cloud evaluator observations. While perceptions are extremely influential, the study found education and experimentation can drive shifts in perception; creating a more authentic position for use in change management.

INDEX WORDS: Action research, institutional evaluation, CIPP model, unaccredited institutions, institutional assessment, higher education regulation, postsecondary education

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CHAPTER 1

INTRODUCTION

Each U.S. state is responsible for oversight of its business and educational institutions. Within the realm of higher education, though individual states vary in their policies and procedures regarding the regulation of unaccredited postsecondary institutions all states have a responsibility to their constituents to stay informed about the potential impacts of such institutions and to consider how best to evaluate this group of schools. For the purposes of this research study, the term *unaccredited* is defined as lacking accreditation by a U.S. Department of Education (USDOE)-recognized accrediting body. This action research case study utilized Stufflebeam's (1971) Context Input Process Product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The need for this investigation arose from the common practice of the regulatory state agency (RSA) to use the same methods in its evaluation of all authorized private postsecondary institutions. While underprivileged in the RSA evaluation, the distinction created by accreditation status is important because of its implications for oversight. Both nationally and regionally accredited institutions are required to meet the expectations of and are subject to the guidelines of accreditors. Those accepting federal financial aid must also satisfy the requirements of the USDOE as well as those of the states in which they operate. Unaccredited postsecondary institutions, however, are usually only accountable to state regulations. This significant difference in oversight creates a gap in oversight and highlights a need for further critical exploration.

The purpose of this action research case study was to utilize Stufflebeam's (1971) Context Input Process and Product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The study was guided by the following research questions:

1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts are necessary within a regulatory state agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?

Coghlan and Brannick's (2014) action research (AR) steps provided the methodological base from which the investigation into the evaluation of unaccredited institutions was initiated. The combination of CIPP model and the action research steps ensured that the study interventions, data, and findings were reviewed for accuracy, appropriateness, and applicability in answering the research questions. This approach also enhanced the study's validity because the model emphasizes ongoing consideration of different perspectives of the problem, framed by the central components of context, input, process, and products.

Overview of Postsecondary Education

This section presents an overview of postsecondary educational institutions in order to situate the sample—unaccredited institutions—within the broader spectrum of higher education. In the United States, institutions are either accredited by a USDOE-recognized accrediting body or they are unaccredited. Regarding funding structure, institutions are either public or private. Public institutions are traditionally nonprofit, while private institutions can be either nonprofit or

for-profit. Figure 1 offers a simple schematic for illustrating these types of postsecondary education institutions. The initial division of schools addresses privatization, and each group is further broken down according to profit structure and accreditation status.

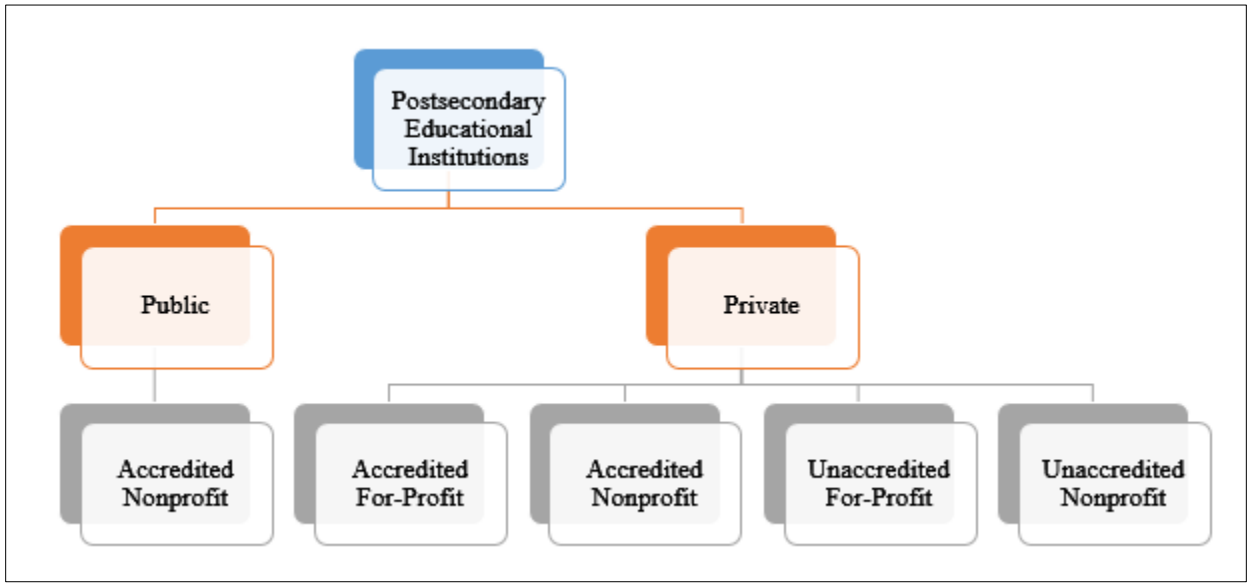

Figure 1. Organization of postsecondary education in the United States.

Whereas accredited schools can be either public or private, unaccredited schools are consistently private entities. Private institutions comprise the only group that often operates unaccredited, yet this status has nothing to do with their business structure. Operating fiscally as a for-profit business does not automatically equate to being an unaccredited institution.

Nontraditional private postsecondary institutions, those regulated by the RSA, represent a modern privatization of higher education that is separate from that of traditional private colleges and universities. Traditional private schools historically, are accredited and operate as nonprofit institutions, meaning that surplus earnings are retained in the accounts of the institutions rather than provided as earnings to the stakeholders (as for-profit businesses do). The nontraditional

private postsecondary field is often misunderstood, viewed as identical to the for-profit sector. This confusion is includes business structure as well as accreditation status and overall institutional processes. For example, at a January 2017 state budget hearing on higher education, one state congressman inquired, "*What are we going to do about those diploma mills that advertise on late-night TV?"* "Diploma mills" is a colloquialism for businesses that offer simple payment in exchange for postsecondary degrees. As the congressman's question suggests, high advertising budgets, like those of large online nontraditional postsecondary institutions, are assumed to indicate lower-quality education. This study addressed this confusion by experimenting with a stratified evaluation based on institutional accreditation status.

Accreditation

Accreditation accompanies institutional or programmatic approval by a regional or national USDOE-recognized accrediting body. Postsecondary institutions and programs approved by American accrediting groups are located in all 50 states and 95 countries (Eaton, 2006). Regional accreditation organizations tend to accredit nonprofit institutions as well as public colleges and universities, while national accreditation organizations tend to work primarily with for-profit institutions (Government Accountability Office, 2014).

The voluntary review process to gain and maintain accreditation requires the applicant to document implementation of and compliance with agency-specific standards in order "to 'prove' their suitability" (Harvey, 2004, p.5). Harvey (2004) pointed out that "inputs, process or outputs or any combination of these" (p. 3) may be considered for accreditation. For example, the Comprehensive Standards of the Southern Association of Colleges and Schools Commission on Colleges (2015a) comprise four categories: (1) Institutional mission, governance and effectiveness; (2) programs; (3) resources, and (4) institutional responsibility for commission

policies. Compliance with the standards is intended to support the roles of accreditation, which, according to Eaton, (2006) include quality assurance, allowing access to federal and state funds, encouraging private-sector trust, and promoting ease of credit transfer.

Criticism of accreditation. While accreditation is considered "to be a reliable authority on academic quality" (Eaton, 2006, p. 1), there are many reasons why institutions do not seek this type of approval. Some criticize accreditation for its misleading noncompulsory "image." Although not required, accreditation is tied to federal funding; consequently, many postsecondary institutions feel forced to comply in order to access this large funding source (Burke & Butler, 2012). Another criticism is that accreditation requirements are misaligned with institutional processes. While accreditation standards, policies, and rules can comprise a supportive and unambiguous structure, some argue that accreditation requirements are far too rigid for today's higher education climate. Burke and Butler (2012), for example, argued that accreditation is flawed because it is does not evolve with the changing nature of postsecondary education. Harvey (2004) studied the accreditation experience from the perspective of institutions and held that its "main function is to maintain control of the sector and the programmes offered" (p. 4). He also noted the taxing nature of the process: "Repeatedly we saw references to jumping through hoops, tail wagging dogs, asking permission and the like" (p. 15). Similarly, Burke and Butler (2012) observed that accreditation was viewed as an "onerous requirement rather than [a] measure of quality" (p. 8). Thus, while accreditation and quality are often presented as synonymous, the literature indicates that this is not a universal perspective.

Another area of concern relates to the secular nature, or image, of accreditation. For instance, Hindson and Dobson (1983) questioned the value of accreditation for Christian postsecondary institutions. They urged readers to "guard against the tendency to consider

unaccredited schools inferior" (p. 11) and to be mindful when deciding if academic accreditation indicates quality or simply compromise. To highlight their admonition, Hindson and Dobson (1983) quoted Christian education anti-accreditation proponents: "Superiority should not seek accreditation from inferiority" (p. 11); "Just as a license to build a building does not determine what goes on in that building, nor a license to erect a sign on a church property determine the message on the sign, so accreditation does not dictate what the content of what is taught in the classrooms" (p. 10). Though skeptical of accreditation, however, they did address possible positive repercussions of Christian institution accreditation. Because accreditation has the potential to legitimize degrees, the authors believed it could address the dearth of Christian professionals. Accreditation could also allow for improved institutional integrity and continuous improvement efforts. Finally, Hindson and Dobson (1983) maintained that if Christian education is in fact superior, it has nothing to fear by submitting to secular review.

The need for federal financial student aid also impacts an institution's decision to seek (or not seek) accreditation. Non-degree, certificate-granting institutions tend to offer short-term programs that are less costly to students—resulting in reduced need for student loans, unlike high-cost degree programs. Out of the 123 unaccredited schools authorized in the study state, 100 offer certificates only. Given that accreditation is often driven by an institution's need and/or desire to accept federal student loans, these schools may have less desire to partake in the costly process of seeking accreditation. For example, in 2015, the American Bureau of Health Education Schools (ABHES), a national healthcare education accreditor, charged between $21,050 and $33,850 for initial institutional approval and then between $2,200 and $15,000 for annual renewal (ABHES, 2015). The Higher Learning Commission (HLC), the regional accreditation group for the north-central United States, has a five-phase application process for

candidacy which, in 2015, cost applicants $25,750 (HLC, 2015). Furthermore, the institution would be responsible for paying $6,200 plus expenses for the initial candidacy visit. Similarly, the price associated with an application for candidacy for the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC, 2015b) is between $13,000 and $18,000, depending on whether the institution was located in the United States or internationally. This figure did not include the committee evaluation costs, estimated to be $1,500 per evaluator, per day of evaluation (SACSCOC, 2015). The funding sources of accreditation agencies also represent a point of contention regarding the authority of accreditation bodies because accreditation agencies support their operating budgets through mandatory fees collected from institutions seeking to obtain or maintain accreditation. Burke and Butler (2012) likened this funding scenario to the fox guarding the hen house—in this case, the hen house being the bank accounts of the accrediting group.

It is important to note that state authorization, such as that granted by the RSA, is required for accreditation. This means the financial expenditure associated with accreditation applications and annual fees are in addition to costs imposed by the state(s) where the institution is authorized to operate. In the study state, initial authorization costs between $1,600 and $50,000, depending on degree-granting level, estimation of institutional income, and evaluation committee costs. Furthermore, an insitution may need to obtain authorization in multiple states and thus be responsible to remit the fees of each regulatory state agency. This is based on each state's definition of physical presence. In some states, this is determined by the existence of a campus or teaching site, while in others, such as the study state, it is also triggered by advertisements or recruiting efforts initiated in the state, well as by enrolling students in online courses.

History of the RSA. The regulatory state agency (RSA) examined for this study was created in 1990 to regulate private educational institutions. This coincided with the growth in popularity and market share of the for-profit postsecondary industry which began in the 1980s (Sheets, 2002). According to Sheets (2002), buyer interest in this sector aligned with a strong economy, which led to an increased purchasing power for consumers. The industry continued to sustain itself throughout the 1990s, but the 2000s saw a rapid expansion of this higher education market sector. For example, for-profit institution enrollment in associate-degree programs increased 100% between the 1995-1996 and 2010-2011 academic years—a growth rate three times that of community college (Gilpin, Saunders, & Stoddard, 2015). Gilpin, Saunders, and Stoddard (2015) proposed that the success of for-profit institutions at the time may have been associated with the industry's ability to change based on the fact that the type of organizations comprising it are characterized by "more defined stakeholder interest, fewer tenured faculty, and physical and financial structures that allow more flexibility" (p. 54). However, the growth of this sector has stalled in recent years; in fact, for-profit institutions have experienced a substantial decrease in enrollment along with increased oversight at the federal level. At the University of Phoenix, for example, student enrollment dropped by half between 2010 and 2014 (Kamenetz, 2015). Harris Miller, president of the Career College Association, revealed in a 2010 National Public Radio interview that he believed the scrutiny on for-profits was due to the sector's previous rapid growth (Martin, 2010). Student loan debt, valued at $1.2 trillion in 2014 (Kamenetz, 2014), and default are also likely to be affecting the health of the for-profit industry.

This study's examination of unaccredited institutions in the state arose from a broader, critical consideration of the for-profit education industry and perceptions of the private postsecondary industry. While no studies were found specific to unaccredited institution, the

media and research studies have been focused on for-profit postsecondary education. Examples of research foci include concerns about the "for profit" label based on the type of consumer (Hagelskamp, Schiefer, & Distasti, 2014; Sladek, 2014). Sladek (2014) examined perceptions of for-profit institutions and found that integrity, relative to the higher education industry, is contextual and depends on the audience. Hagelskamp et al. (2014) studied the perceptions of for-profit institutions by students, alumni, and employers. The authors identified four major findings relative to education from for-profit institutions: (1) For-profit undergraduate students are not comparison shoppers; (2) students have distinct expectations (e.g., high levels support, flexibility in class offerings); (3) alumni are satisfied with education but split on costs, and (4) employers are either neutral on the value of for-profit education or prefer public institutions. Students enrolled at for profit institutions also tended to be unfamiliar with the term "for profit" (Hagelskamp et al., 2014). While these studies do not address the unaccredited institutions, a better understanding of the regulatory environment enables a more comprehensive view of the higher field in which this group of institutions are situated.

Neglected Unaccredited Institutions

Unaccredited schools are not eligible for federal student financial aid and thus are often overlooked and excluded from research and national reports and statistics on postsecondary education in the United States. For example, the *Condition of Education* report, published by the National Center for Education Statistics, is a federally mandated annual report provided to both the White House and Congress. The report presents data compilations that offer an overview of participation in education (i.e., pre-kindergarten through post-baccalaureate studies); factors affecting enrollment and completion (e.g., socioeconomic status, level of education attainment by parents, race) are also included. Regarding postsecondary education, the 2015 report indicated

that 17.5 million students were enrolled in two- and four-year institutions (Kena, Musu-Gillette, Robinson, Wang, Rathbun, Zhang, Wilkinson-Flicker, Barmer, & Dunlop Velez, 2015). It is important to note, however, that this figure did not include unaccredited postsecondary institutions. The National Center for Education Statistics also ignored the role of unaccredited institutions in its report, *Demographic and Enrollment Characteristics of Nontraditional Undergraduates: 2011-12* (Cominole & Skomsvold, 2015), which examined nontraditional undergraduate students in the United States. The Integrated Postsecondary Education Data System (IPEDS), the primary higher education database administered by the U.S. General Services Administration, provides information on all colleges, universities, technical schools, and vocational institutions that offer federal student aid; thus, unaccredited schools are not included in this system, either.

Certificates and degrees earned from unaccredited institution are another aspect of this neglect, in terms of oversight, that may be problematic. A 2004 GAO report addressed the issue of educational credentials accepted by the federal government (Cramer, 2004). Not only does the federal government prohibit federal employee reimbursement of tuition for instruction received from unaccredited schools, it also does not recognize qualifications earned at unaccredited institutions when making employment or promotion decisions. Additionally, the GAO report inaccurately categorized "diploma mills and other unaccredited schools" (Cramer, 2004, p. 1) in a single group. Lack of institutional accreditation does not mean credentials are traded simply for payments, as is the case at diploma mills. Thus, it can be reasonably ascertained from federal reports and databases that unaccredited postsecondary education institutions are not viewed as falling within the realm of reliable higher education.

Need for Study

In order to meet the requirements of the Higher Education Act of 1965, every U.S. state must regulate postsecondary institutions. While oversight of unaccredited institutions is determined by individual state legislation, most states have policies focusing specifically on accreditation and its influence on approval and assessment. This was evidenced during a spring 2016 national conference for the private postsecondary education sector. In a session dedicated to common listserv discussion topics, a presentation on the regulation of unaccredited degree- and non-degree-granting institutions was delivered and discussed. The study state was identified as one of two states present that allow unaccredited schools to operate indefinitely without accreditation. (Most states limit the number of years an unaccredited degree-granting school can operate. The states then require the institution to either obtain accreditation or close after the prescribed number of years passes.) Additionally, in this conference session, the authorization application structure and evaluation process for all institutions was confirmed to have no norm.

Regulatory state agencies accountable for the oversight of private postsecondary institutions, differ in terms of structure, funding, mission, and responsibilities. For this study, the relationship between the micro and macro contexts, state and federal postsecondary regulation, was considered in order to assess options for data collection and to build the research in a manner that would allow for shared value with external counterparts. As such, this was a "micro" study that sought to also serve the macro environment. Katz and Kahn (1978) proposed that research at the macro level is "invaluable ... in underlining the significant problem and directing our attention to areas in which variables need more careful formulation" (p. 14); however, in this case, it was not the research but the identification of the shared aspect of the problem that was exposed in the macro setting. This was that there was no uniform best practice in which

unaccredited institutions were being regulated. The findings associated with the study of the micro context (i.e., a regulatory state agency) have the potential to produce context-specific solutions relevant to the macro context of private postsecondary education regulation across the United States and to counterpart micro settings—that is, RSAs responsible for institutional oversight. Additionally, because there has been little published research specific to the external evaluation of postsecondary institutions, this study is unique in that it offers a robust examination of how regulators can investigate and justify their actions through an empirical study. Moreover, the larger field of adult education theory and practice could benefit from this study by learning more about accountability and assessment in relation to institutional evaluation, with specific attention to unaccredited schools.

Problem Framing in Practice

Postsecondary education in the United States includes instruction in a wide range of vocational and core-curricular areas, all of which lead to certificates and/or degrees. Beyond content and level, the instructional methods, institutional business structures, accreditation status, and state compliance standards of postsecondary institutions vary widely throughout the nation. The state that served as the focus of this study organizes its oversight of postsecondary education into three state entities: (1) public state colleges and universities, (2) public state technical colleges, and (3) all private educational institutions. This study centered on the agency responsible for oversight of private educational institutions. For the purposes of this study, this organization is referred to as the regulatory state agency (RSA).

The RSA is responsible for regulating training and education for all private certificate- and degree-granting vocational institutions. During the timeframe of the study—March 2016 to March 2017—the RSA was responsible for annual institutional reviews as well as evaluations of

any programmatic or substantive institutional changes for roughly 300 fully authorized schools, of which 123 are unaccredited. Additionally, the RSA regulated approximately 175 private institutions that had been granted exemptions under the law and thus had a narrowed scope of RSA oversight. Examples of RSA exemptions include accredited schools that were in existence prior to the establishment of the RSA and schools that are responsible to another state agency's oversight, such as cosmetology schools, which must also apply to the state Board of Cosmetology. Additionally, the RSA was responsible for the approval of institutions entering into a national reciprocity agreement focused on the online delivery of programming, bringing the total number of institutions requiring annual RSA oversight to approximately 550.

At the time of the study, the RSA staff responsible for implementing postsecondary educational compliance comprised nine full-time employees and two part-time contract employees. Among this group, seven professional staff were responsible for direct communication and supervision of an assigned group of institutions. Generally, regulatory oversight is achieved by the professional staff through the review of document submissions, completion of site visit reviews, facilitation of programmatic evaluations, and investigation and resolution of student complaints. Two administrative staff supported the professional staff, and an executive director and a deputy director led and managed the RSA.

Initial Processes for the Evaluation of Unaccredited Institutions

In the study state, unaccredited and accredited postsecondary institutions were subject to the same RSA process of evaluation. The RSA standards for which all institutions are held accountable throughout the evaluation process were developed at the agency's outset and were based on the standards of a regional accrediting agency. This accreditor model provided a well-tested framework for the young agency. As a result of the variety of institutions that require RSA

oversight, however, uniform applicability of the standards has been a challenge to enforce; consequently, professional staff have unofficially excused small or unaccredited schools from certain standards when doing so seemed reasonable. Criteria that were often disregarded included requirements such as specific credentials for library supervisors and minimum numbers of full-time staff for each educational program. These inconsistencies were recognized by the agency; in 2015 the RSA staff reviewed and proposed revisions, and a modified list and description of each RSA standard was approved by the RSA Board of Commissioners in October of that year. This was the first modification of RSA standards since the last revision had been approved in 2006.

Public Critique of the Regulatory State Agency

Following the publication of a final report detailing the findings of a performance audit, the state's Department of Audits and Accounts recommended that the RSA conduct an internal examination of its evaluation of unaccredited institutions, including an exploration of potential upgrades. This final report was completed in June 2015 as a closing document associated with the initial RSA performance audit, the results of which were published in March 2013. Of the six problem areas identified in the 2013 report, the 2015 final audit findings stated that four areas had been fully satisfied by modifications implemented by the RSA over the course of the two intermediate years, while two areas had only been partially satisfied. The initial 2013 report proposed that student-outcome data (related to retention, graduation, job placement, and student loan defaults) is "widely considered to be the best way to gauge an institution's' effectiveness" (RSA Audit, 2013); as a result, the audit argued that the RSA should collect this information, use it to inform authorization determinations, and publish it on the agency website. The 2015 report echoed this concern and deemed that, because only small changes had been made to RSA

procedures around the collection and use of student-outcome, the recommendation had only been partially addressed. Additionally, the final audit report noted that the lack of emphasis on outcome data hindered both the RSA's ability to assess institutional effectiveness and "the public's ability to make informed choices" (RSA Audit, 2015). The other area that was considered to have been only partially addressed related to the need for the RSA website to include expanded consumer information.

State audit reports have the power to attract media coverage, trigger leadership changes, and disrupt day-to-day institutional processes, and thus the RSA took the final findings seriously. The RSA leadership determined that all partially satisfied recommendations would be investigated. In addition to initiating this study, the RSA's decision formally illuminated the need for an internal assessment of the RSA's evaluation methods. The research process assured that the RSA was holding both itself and its institutions accountable.

The audit report, and the resulting internal discussion regarding methods for determining educational and fiscal stability, revealed a paucity of data concerning the RSA's efforts to investigate the evolution of its institutional evaluation process. Methods criticized by the auditors had been practiced since the inception of the RSA and had typically only been modified in response to external requirements, such as new review procedures required by the USDOE. The limited number of change projects was affected greatly by factors outside the control of the RSA, such as budget (for staffing and technological upgrades) and binding legal codes. The state code, which created the agency and provided an outline for RSA responsibilities, can only be changed through legislative action or the RSA Commission rule making. In this relationship, the RSA had tended to be more reactive than proactive since the promotion of code revisions can put the agency at risk for unwanted and unexpected legislative action.

The last half decade has seen RSA budget allocations dedicated to change initiatives, including the development of a new online record-keeping database, electronic application portal, and upgraded website. All of these initiatives have provide an improved platform for initiating additional improvement measures at the RSA. For instance, the enhanced information technology systems now in use at the RSA allow for easier access to data in addition to more accurate and consistent information present in multiple sources (i.e., on the website and in internal institutional records) than had been available previously. These systems also enable improved capabilities for comparing data, running reports for specific institutional components (i.e., programs, locations, accreditation status), and making modifications to both the record-keeping formats and application content and approval workflows. While the former outdated internal RSA structures were insufficient to support this study, those currently in place have effectively supported the agency in its efforts to investigate, develop, and implement improved assessment measures.

Support for the RSA's change actions was derived from both inanimate resources such as the electronic database and RSA time commitment for the project, and from human resources. These included the research team, the RSA staff, and their relationships to each other. Further critical support of both the project and study was garnered from a review of the literature, presented in Chapter 2. This information framed the study during its early conception through an identification of a gap in the research, which showed that unaccredited institutions had not been studied in any depth. Additionally, the literature review reinforced actions taken researcher by providing ample references to bolster the exploration, testing, and implementation appropriate measures for evaluating unaccredited institutions.

CHAPTER 2

LITERATURE REVIEW

Problem Framing in the Literature

The purpose of this action research case study was to utilize Stufflebeam's (1971) Context Input Process and Product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The following research questions guided this study:

1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts are necessary within a regulatory state agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?

This chapter is a review of literature to understand the evolution of institutional evaluation; the Context Input Process Product (CIPP) model; higher education quality metrics; and accountability.

The literature review provided a theoretical and conceptual foundation during the development, implementation, and analysis of this action research study. Initial searches for identifying relevant research publications centered on unaccredited institutions and higher education evaluation studies. Given the paucity of articles related to unaccredited institutions, the search parameters were expanded to include accredited institutions in order to consider any

counter perspectives. The topic of quality assessment within higher education institutions was also incorporated into the search to allow for a more comprehensive review. Regarding the theoretical framework, literature focusing on studies that engaged with the CIPP model were reviewed. Google Scholar was the primary source used to identify relevant research, with the University of Georgia's library database serving to support the literature review.

Evolution of Institutional Evaluation

The evaluation of postsecondary institutions has experienced great change over the past 50 years. This change began in the 1970s and 1980s, which witnessed the first wave of expanded accountability measures for higher education institutions. The new measures focused on access, productivity, and quality, but gave limited attention to student outcomes (Sheets, 2002). In the 1990s, accountability measures began to place greater emphasis on both learning and economic outcomes (McLendon, 2003; McLendon et al., 2006; Sheets, 2002). Stufflebeam (2001) argued that this transition was the result, in part, of an increased awareness of globalization and a subsequent increase in global economic competition. By shifting evaluative concerns to the products of learning, it was held that efficiency would increase (de Lancer Julnes, 2006). Also during this time, many states sought to improve practices that would keep higher educational institutions accountable to the public (McLendon, 2003). The creation of the RSA was an example of this movement, established during the study state's 1990 legislative session.

Though assessment trends shift and develop, much of the research concerning evaluation in higher education continues to center on the basic concepts of inputs and outputs. Nusche (2008) offered a definition of each:

> Inputs are the financial, human and material resources used, such as funding and endowments, faculty and administration, buildings and equipment….. Outputs are

> anything that an institution or system produces. (p. 7)

While inputs-based evaluation focuses on elements of institutional architecture, outputs-based evaluation concentrates on individual products. This includes how each aligns with the mission of the institution. The wide range of elements considered in institutional assessment, along with the distinctive (and opposite) focal points of assessment, allow and perhaps even encourage the development of gaps in evaluation.

Systems theory. Systems theory proposes that a holistic approach to evaluation, including both inputs and outputs, is appropriate for program review and assessment. Present in a variety of environments, systems, according to Banathy (2000), possess "four major characteristics: (1) goal orientation; (2) active inputs; (3) outputs … tied to systematic goals; and (4) presence of feedback from the environment regarding the output" (as cited in Mizikaci, 2006, p. 43). Put simply, systems are organizations of processes that have a starting and end points. Additionally,

> the system can be composed of subsystems as well as units or parts making the whole interaction. Once organized, a system is not simply a collection of parts but a functional entity that has properties that cannot exist independently as a collection of parts. (Mizikaci, 2006, p. 43).

Viewing systems as living organisms, comprised of interconnected components, is useful when examining the development and review of evaluation methodologies. A tree metaphor is presented in Chapter 4, the case study, to describe aspects of this study.

Researchers have offered multiple evaluation guidelines that align with the main tenets of systems theory. Regarding institutional effectiveness, for instance, Ewell (1985) proposed that four questions should guide any systems evaluation: "What broad changes in student learning

and development have actually occurred in particular institutions as a result of instruction?" (p. 10); "For whom?" (p. 13); "With what result?" (p. 14); and "At what cost?" (p. 16). These questions allow for a consideration of institutional inputs, outputs, and processes related to impact. The Online Learning Consortium, a professional organization dedicated to online education, utilizes five pillars (i.e., learning effectiveness; cost effectiveness and institutional commitment; access; faculty satisfaction; and student satisfaction) in its systems evaluation of higher education institutions (Moore, 2005). Moore (2005) maintained that these pillars contribute to the maintenance of continuous quality improvement, defined as a "process that measures progress towards goals using metrics and feedback from stakeholders for continuous improvement" (p. 9). This view holds that the systems view can support both evaluation and ongoing progressive institutional evolution. Senge and Sterman (1992) noted that in the organizational development field, "professionals have long advocated a systems perspective for organizational change" (p. 1008). Because higher education institutions represent systems affected by their environments--of which, in this study, the regulatory state agency (RSA) was a part—a holistic systems model was deemed appropriate to guide this action research.

Context Input Process Product Model

According to Stufflebeam (1968, 2003), evaluation serves to inform decision-making and to strengthen and improve the area under review. To support these objectives, Stufflebeam (1971) developed the context input process product (CIPP) model, a "systematic comprehensive … framework" (Zhang, Zeller, Griffith, Metcalf, Williams, Shea, & Misulis, 2011, p. 62) for implementing a systems theory-guided program evaluation. According to Stufflebeam (1971), this model helps to answer four key questions: "What should we do? How should we do it? Are we doing it correctly? and Did it work?" (p. 5). Figure 2 illustrates the model's key components.

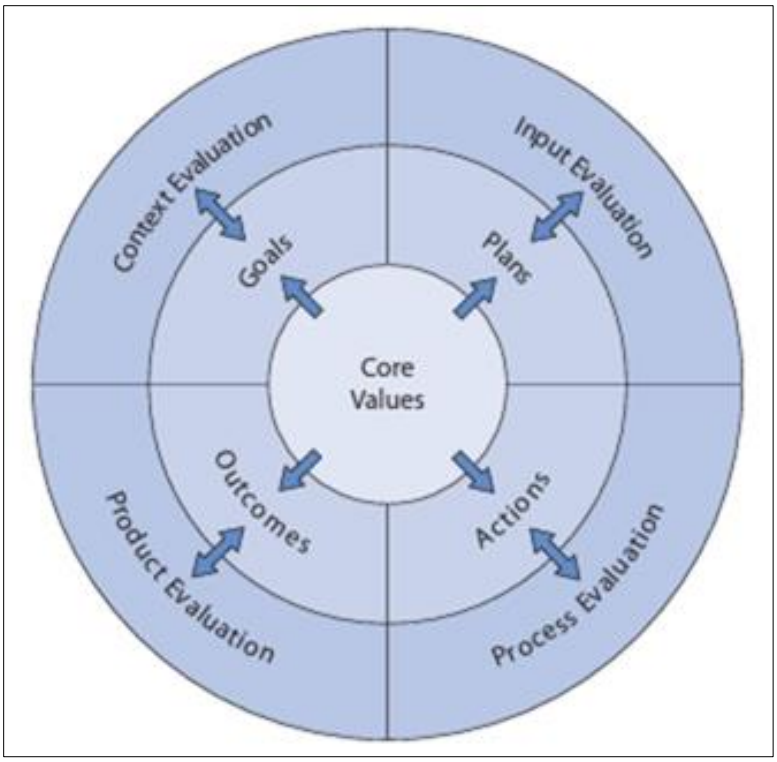

Figure 2. Key components of the CIPP evaluation model and associated relationships with programs. Source: Stufflebeam& Coryn, 2014, p. 318.

At the center of Figure 2, Stufflebeam and Coryn (2014) placed the concept of core values, which relate to the innate beliefs held by the evaluator. This could be a wide range of values including perceptions of the evaluation, the entity being evaluated, and even the evaluating organization itself. The central positioning of this concept recognizes its prominent influence in any decisions made or perspectives maintained by the individuals and organizations involved in the review. Grounding oneself at the core allows a more authentic view from which to examine each of the four quadrants of the CIPP model—depicted in the outer layer of the figure (Stufflebeam & Coryn, 2014). The middle layer in the figure offers simple, one-word descriptions of the focus of each of the quadrants. The structure provided by the model is critical for completing a holistic evaluation of a system. This was noted by Zhang et al. (2011) who

argued that "without the guidance of the Context, Input, Process, and Product Evaluation Model, oversight or failure can easily occur in any part of the process" (p. 79). Each aspect of the evaluation included as part of the CIPP model is described in more detail later in this chapter

An emphasis on evaluator objectivism is another feature of the CIPP model. The CIPP model supports objectivist evaluations through its provision of a template for use in a systematic review (Stufflebeam & Coryn, 2014). Objectivist evaluations propose that the "moral good" is supported by review that "is objective and independent of personal or human feelings" (Stufflebeam, 2003, p.13). According to Stufflebeam and Coryn (2014), objectivism signals a "quest for clear, unambiguous answers" (p. 336). Furthermore, they argued that objectivist evaluations emphasize improvement rather than simply proving that expectations were or were not met.

Quality improvement is prioritized in the application of the CIPP model. Through learning by doing, the framework allows for identification of weaknesses but also provides space to rectify those weaknesses (Stufflebeam & Coryn, 2014). This encourages ongoing critique as well as experimentation with potential solutions. Stufflebeam and Coryn (2014) highlighted the CIPP model's development functionality in the following description: "It treats evaluation as a tool by which evaluators, in concert with stakeholders, can help programs, projects, and other services perform better for the beneficiaries. Fundamentally the model is designed to promote growth" (p. 332). Stufflebeam (1994) noted that this attention to improvement is supported through the model's ability to provide direction, which in turn enhances the ability of both the evaluator and the evaluated to identify and act, relative to areas of concern.

Stufflebeam and Coryn (2014) argued that because of its focus on sharing responsibility for review and action, the CIPP model assumes a social-systems approach. This supports

Stufflebeam's (2011) expectation that critical review applies to both the area under review as well as the evaluation itself. He argued that while "primitive" (p. 101)—due to a lack of publicized designs and specific research—meta-evaluation, or evaluation of evaluation, allows for the development of improved processes. Another significant feature of the CIPP model is its ability to guide both formative and summative assessments (Stufflebeam & Coryn, 2014), able to sustain ongoing reviews and to guide concluding judgements. Both of these types of review provide "sound information" for making decisions—the key objective of evaluations, according to Stufflebeam (1968).

Stakeholders. In addition to being systematic, objectivist, and improvement-oriented, the CIPP model is distinctive because it privileges stakeholder perspectives. This allows evaluation and assessment to be achieved in a manner that is not only comprehensive but also inclusive. Review is encouraged to be completed "in concert" (Stufflebeam & Coryn, 2014, p. 332) with stakeholders, which is intended to increase the professionalism of the evaluation (Stufflebeam, 2001). Additionally, involving those evaluated in discussions related to guidelines, methods, and publications assists in fostering their support in the evaluation process (Stufflebeam, 2011).

Green (1994) and Stufflebeam (2001) believed that valuing stakeholders' role in the evaluation process is critical to determining what quality is in the context of higher education settings. The benefits associated with inclusivity have also been addressed by Torres and Preskill (2001), who proposed that "stakeholder involvement in the evaluation's design and implementation is intended to increase: (a) their buy-in to the evaluation, (b) their understanding of the evaluation process, and (c) ultimately, their use of the evaluation's findings" (p. 388). According to Stufflebeam (2001), communication with stakeholders should include answering questions and providing information so that an "accountability record" (p. 56) is produced.

Furthermore, regularly collecting feedback throughout the evaluation process is important because it allows participants to contribute to the ongoing design of that process (Zhang et al., 2011).

CIPP: Context. Context evaluations address the environment in which a system is situated. In the example of an institution, the context "encompasses everything that happens to a student during the course of an education program" and "includes not only the program, personnel, curricula, teaching practices, and facilities ... but also the social and institutional climate in which the program operates" (Astin, 2012, p. 87). Stated simply, context includes not only the entity being evaluated, such as an institution, but also the external factors affecting the institution. These features are often viewed as being outside the control of institutional staff and faculty. An example of one such area is the job market, which offers graduates an opportunity to leverage their education for employment. A poor job market can result in the appearance of low quality training should graduates not be getting jobs when in actuality there may be simply no jobs to be had. Consideration of contextual factors such as this offer deeper insight into the system being evaluated.

Context evaluation includes review of "the purpose of the program, the needs that will be fulfilled by the program and also the foundation for determining the decision" (Hurmaini, 2015, para. 50). Zhang et al. (2011) and Stufflebeam and Coryn (2014) proposed that context evaluations should not only act as needs assessments but also address problems, assets, and opportunities. Evaluation of the context within the CIPP model requires a consideration of the situational setting and also its impact on the other three phases—that is, input, process, and product. This holistic attention supports an in-depth assessment. For example, according to Stufflebeam and Coryn (2014), context evaluation findings give stakeholders an opportunity to

both assess a program's goals and judge the outcomes according to their likely responsiveness to the program's objectives. Furthermore, context evaluation allows evaluators the opportunity to examine the external effects of the program (Stufflebeam & Coryn, 2014).

Critiques of context evaluation have noted that the potential exists for misidentification of "crucial indicators (e.g., purpose, audience, resources, and dissemination strategies)" (Zhang et al., 2011, p. 64). While definition of these indicators is challenging, they are also difficult to assess. As Astin (2012) observed, evaluation of the environment is not only the "most neglected" but also "the most difficult and complex challenge in the field of assessment" (p. 87). Because of this difficulty, the AR team in this study addressed context evaluation in its last phase of the project, ensuring that the most experienced research planners, interveners, and assessors available were responsible for formulating and implementing different approaches to context evaluations.

CIPP: Input. Input evaluations focus on the resources available to the entity under review. In relation to the RSA institutional evaluation, inputs included policies, procedures, faculty, students, and available funds. Assessment and evaluation of this area of institutional operations can contribute to decision making related to planning, budgeting, and developing an accountability record (Stufflebeam & Coryn, 2014).

The benefits of an input-focused evaluation are many. Inputs are typically easy to measure because they tend to be stable, rigid pieces of data. In the review of an institution, these may include documentation such as curriculum plans, student-to-faculty ratios, and catalogs. Items such as these can be objectively reviewed based on legal codes, standards, and/or policies, and as a result can be clearly defined and assessed. Additionally, the unyielding nature of this type of review, given its goal for objectivity, allows for direct measures of compliance and

focused training of staff and institutions.

While input evaluations are common at regulatory state agencies, some researchers have criticized this type of assessment. Burke and Butler (2012), for instance, argued that tasks such as counting library books and reviewing complaint procedures are illegitimate measures of quality. According to Moynihan (2006), the emphasis "on maximizing inputs and rendering compliance" is "inefficient and ineffective" (p. 78), and is associated with traditional public organizations, like the RSA in this study. In addition, some have argued that evaluations focusing on inputs rather than outputs are detrimental to not only the institution but also students, their families, and their future employers because of the lack of attention devoted to program impact (Dwyer, Millet, & Payne, 2006).

CIPP: Process. Process evaluations are designed to assess the activities associated with the program, organization, etc., under review. According to Zhang et al. (2011), the objective of a process evaluation is to measure "(a) the extent to which the planned activities are carried out and (b) whether adjustments or revisions of the plan are necessary" (p. 64). Evaluations of this nature also address the relevant capabilities of participants (employees) and how well they fulfill their roles. Zhang et al. (2011) provided the following examples of process evaluation techniques: "on-site evaluations, participant interviews, rating scales, questionnaires, records analysis, photographic records, case studies of participants, focus groups, self-reflection sessions with staff members, and tracking of expenditures" (p. 65). Within the CIPP model, process evaluations can also vary regarding source. Both internal assessments (e.g., student surveys administered by the institution) and external assessments (e.g., classroom observations by a regulator) can fall within the "process" quadrant of the CIPP model.

CIPP: Products. According to Zhang et al. (2011), "the purpose of a product evaluation

is to measure, interpret, and judge a project's outcomes by assessing their merit, worth, significance, and probity" (p. 66). Examples of product evaluations include

> logs and diaries of outcomes, interviews of beneficiaries and other stakeholders, case studies, hearings, focus groups, document/records retrieval and analysis, analysis of photographic records, achievement tests, rating scales, trend analysis of longitudinal data, longitudinal or cross-sectional cohort comparison, and comparison of product costs and outcomes. (Zhang et al, 2011, p. 66)

Products are central to the higher education environment since outcomes such as retention, graduation, and placement rates comprise common datasets used to measure value and success.

Schorr (1995) argued that an output focus enables an institution to provide "the necessary flexibility and autonomy at the front-end" (p. 4) in order to promote support for the institutional mission. Astin (2012) also believed in the valued position of products, proposing "outcomes are generally the most critical and important to educators and researchers" (p. 41). Outcome data are also vital because of their potential to assure the public that investments are producing results (Schorr, 1995).

Varying perspectives on the purpose of postsecondary education affect the evaluation of outputs, including the extent to which they demonstrate quality and accountability. For example, Green (1994) maintained that higher education is intended to produce graduates for jobs and for "pushing forward frontiers of knowledge" (p.8) through research. Proposed federal gainful employment laws have privileged the institutional product of job placement as a key measure of the quality of education; failure to meet its guidelines of this product may result in loss of access to federal financial aid for the associated program. Because of the potential for divergent and/or conflicting significance assigned to individual products, it is important that desired institutional

outcomes are clearly defined—a clarification that allows for evaluation (Schorr, 1995). In addition to the importance of classification, Ewell (1985) held that institutional products should be prioritized and, if possible, measured.

While the value of outputs may be obvious, the tendency to over-privilege outcomes-related information in evaluations has been criticized. For instance, Astin (2012) claimed that an outcomes-only assessment is flawed because it does not measure progress since input data are not used to offer comparisons. Additionally, this type of assessment is insufficient on its own to measure effectiveness because the environment is not considered in the evaluation (Astin, 2012).

CIPP model empirical study findings. While empirical studies have been conducted using the CIPP model as the evaluation framework, none has addressed the evaluation of unaccredited institutions specifically. Additionally, during this literature review, no study was found that addressed, in any capacity, the relationship between a regulatory compliance entity and institutional evaluation. However, though not related to this study's setting or sample, the empirical studies reviewed did support the validity of the CIPP model for this research. Table 1 highlights those studies reviewed and provides basic information about each source, including author(s), year of publication, purpose, sample, method, and key findings.

Table 1

Empirical Findings: CIPP Model for Evaluation

Author(s)/ Year	Purpose	Sample	Method	Key Findings
Boonchutima & Pinyopornpanich, 2013	"to determine the effectiveness of the Department of Disease Control's communication performance and recommended guidelines for improving it" (p.36)	Representatives from 20 divisions of the Department of Disease Control in Thailand	Case study	"This research shows that the CIPP model is effective to evaluate communication, as it is fair for those being evaluated. Communication researchers that wish to conduct research using the CIPP model can adapt the tools used in this research to better suit the institute or organization they are evaluating" (p. 51)
Chen, 2009	"to attempt, through the gathering of qualitative data from a variety of sources and using a variety of research instruments, an evaluation of the 20 English training courses which were designed for and taken by students who hoped, mainly, to become children's English language teachers." (p. i)	20 English Training courses offered in southern Taiwan	Case study	"If followed carefully it [the CIPP model] covers all aspects and features of a program and provides a methodical, all-embracing design which can produce useful material for exploration and adoption if appropriate. It is in most cases a positive program enhancing exercise designed to develop rather than close existing programs." (p.i-ii)

Author(s)/ Year	Purpose	Sample	Method	Key Findings
Mirzazadeh, Gandomkar, Hejri, Hassanzadeh, Koochak, Golestani, & Shahi., 2016	**"**The purpose of this study was to utilize the Context, Input, Process and Product (CIPP) evaluation model as a comprehensive framework to guide initiating, planning, implementing and evaluating a revised undergraduate medical education programme." (p. 15)	Medical Program offered by the Tehran University of Medical Sciences	Longitudinal evaluation using focus groups, questionnaires, and performance measures.	"The CIPP model has the potential to guide policymakers to systematically collect evaluation data and to manage stakeholders' reactions at each stage of the reform in order to make informed decisions. However, the model may result in evaluation burden and fail to address some unplanned evaluation questions." (p. 15)
Tokmak, Baturay, & Fadde, 2013	**"**to evaluate and redesign an online master's degree program consisting of 12 courses from the informatics field using a context, input, process, product (CIPP) evaluation model. " (para 7)	3 sets of students enrolled in the online program	Mixed methodology	The CIPP model enabled focused attention on the 4 quadrants and encouraged the researchers to consider the perspectives of different stakeholders: students, instructors, and managers.

Findings in all of studies presented in Table 1 suggested that the CIPP model was an effective tool (Boonchutima & Pinyopornpanich, 2013; Chen, 2009; Hurmaini, 2015; Mirzazadeh et al., 2016; Mohebbi, Akhlaghi, Yarmohammadian, & Khoshgam, 2011; Tokmak, Baturay, & Fadde, 2013). These results contributed to the justification for its application in the RSA setting. Researchers have described the value of the model as a whole as well as the benefits of its individual quadrants (i.e., context, input, product, process). For example,

Mirzazadeh et al. (2016) studied the impact of the CIPP model on the evaluation of an undergraduate medical program and found that context evaluation was especially effective in proving the viability for change and, as a result, assisting in convincing faculty and policymakers that the change was worthy of support. In addition, specific to the context quadrant, Khalid, Rehman, & Ashraf (2012) found this phase of the CIPP model allowed for a predefining of outcomes and goals, which in turn enhanced planning. In addition to noting the specific benefits associated with a focus on context, Mirzazadeh et al. (2016) found that the CIPP model's process phase offered an opportunity to identify strengths and weaknesses associated with each change intervention.

Holistically, the CIPP model promotes a wide range of benefits. Boonchutima and Pinyopornpanich (2013), for instance, found it to be useful for evaluating communication performance within a public health organization. Additionally, in describing the value of the model for use in change management, Mirzazadeh et al. (2016) stated, "The CIPP evaluation model could successfully address all steps of the reform even when the new programme is still being developed" (p. 21). The authors also found that the model "was helpful in managing the stakeholders' reactions through the reform process" (p. 21). Similarly, Tokmak et al. (2013) complimented the framework for its ability to attend to the various perspectives of each stakeholder, as seen through the context, input, process, product lenses of the CIPP model. Regarding gaps and areas in need of improvement, both Mohebbi et al. (2011) and Hurmaini (2015) concluded that the CIPP model was useful in university course evaluation. Mirzazadeh et al. (2016) and Mohebbi et al. (2011) maintained that the systematic nature of the CIPP model contributed positively to the evaluation process.

Higher Education Quality Metrics

Measures of quality and assessment benchmarks provide critical structures for evaluation. As such, in addition to studies that engaged the CIPP model, literature focused on the assessment of quality at higher education institutions was also reviewed. Quality, as defined by Green (1994), is "the extent to which a product or service meets its stated purpose(s)" (p. 15). Because various metrics are used to measure quality within an educational setting, it is critical to the evaluation process to determine how quality is defined for the particular setting or relationship. A review of empirically based research indicates that multiple sources have been used to assess higher education quality. These include exam results, student surveys, institutional staff surveys, college rankings, and post-graduation impact. Table 2 highlights studies reviewed as part of this study and provides basic information about each source, including author(s), year of publication, purpose, sample, method, and key findings.

Table 2

Empirical Findings: Evaluation of Quality at Postsecondary Institutions

Author(s)/ Year	Purpose	Sample	Method	Key Findings
		Exam Results		
Morgan, Bergin, & Sallee, 2012	To examine passing rates of the certified public accounting (CPA) exam by four different groups of institutional graduates: graduates from three schools accredited by separate business-school accreditors and graduates from unaccredited business	CPA exam scores from 451 colleges and universities, each with at least 20 students sitting for the exam	Dataset	Students who had graduated from AACSB-accredited institutions earned the best average scores. Unaccredited institution graduates, ACBE-accredited graduates, followed this and ACBCP-accredited graduates. This study indicates that accreditation as a measure of business school quality is highly affected by the particular accrediting body.

Author(s)/ Year	Purpose	Sample	Method	Key Findings
	schools (one group). The three accredited institutions were accredited by either AACSB, IACBE, or ACBSP.			
		Student Surveys		
Marsh & Bailey, 1993	To examine the profile of scale scores (e.g., high on enthusiasm but low on organization) using the students' evaluations of educational quality (SEEQ)	Ratings of 123 instructors in 3,079 classes collected over 13 years	Survey	The instructors "appear to have distinct profiles of strengths and weaknesses ... and students are apparently able to discriminate their instructors' strengths and weaknesses" (p.10-11). The researchers also noted that because the ranges in the instructors' rating varied greatly, depending on the SEEQ item, "total score differences must be interpreted cautiously" (p.11).
Sun, Tsai, Finger, Chen, & Yeh, 2008	To investigate learner satisfaction in the e-Learning setting by using a survey focused on six dimensions: learners, instructors, courses, technology, design, and environment	209 survey responses from students enrolled in 16 different e-Learning courses at two public universities in Taiwan	Survey	"The results revealed that learner computer anxiety, instructor attitude toward e-Learning, e-Learning course flexibility, e-Learning course quality, perceived usefulness, perceived ease of use, and diversity in assessments are the critical factors affecting learners' perceived satisfaction" (p.1).
Tsinidou, Gerogiannis, & Fitsilis, 2010	To examine the importance of students' perceptions of the quality of higher education institutions in Greece	Responses from 265 questionnaires completed by undergraduate students of all departments in the School of Business and Economics	Survey	Clarity and friendliness were the most valued criteria related to the administration, while communication skills and friendliness were valued most in academic staff. The highest ranked programmatic structures were access to laboratories and variety in elective modules. Classrooms and laboratories were by far the most valued criteria related to facilities. Of

Author(s)/ Year	Purpose	Sample	Method	Key Findings
				the career prospects criterion, perspectives for professional career was most valued by far.
Soutar & McNeil, 1996	To learn more about student expectations of quality, student perceptions of service from academics, and the expectation and perception of quality of administrative services	Responses from 109 surveys completed by students from three classes in a large Australian university	Survey	"Students were found to be quite satisfied with the quality of the academic units surveyed" (p. 80), except in regards to administrative services: "students were very concerned about the lack of communication with the administrative staff and this may be impacting strongly on their overall negative view of the university's administration" (p. 81).
Clemes, Gan, & Kao, 2008	"To gain an empirical understanding of students' overall satisfaction in a university in New Zealand's higher education sector" (p. ii)	Responses from surveys completed by 223 students studying at Lincoln University	Survey	Dimensions of service quality were identified as interaction quality, physical environment quality, and outcome quality. Ten additional sub-dimensions were also identified: academic staff, administration staff, academic staff, availability, course content, library, physically appealing, social factors, personal development, academic development, and career opportunities.
Simpson & Siguaw, 2000	To investigate faculty perceptions of student surveys and the ways in which faculty purposefully attempt to influence student responses	Responses from 57 surveys completed by faculty members of the Academy of Marketing Science	Survey	The researchers found that faculty members do attempt to influence student evaluations of instruction. There was an equal divide (48.2% who believed surveys are somewhat accurate, 42% who believed they are somewhat inaccurate) concerning validity of student evaluations of teaching.

Author(s)/ Year	Purpose	Sample	Method	Key Findings
Institutional Staff Surveys				
Cameron, 1978	To examine the following areas: student education satisfaction; student academic development; student career development; student personal development; faculty and administrator satisfaction; professional development and quality of faculty; system openness and community interaction; ability to acquire resources; and organizational health	Responses from 325 surveys completed by faculty and administrators at six universities.	Survey	Organizational effectiveness is multidimensional and should be considered within an organization's specific domain.
College Rankings				
Dill & Soo, 2005	To investigate the measurement of strengths and weaknesses of academic quality ranking systems used around the globe. A consideration of the appropriate source (private sector vs. private sector) of the rankings was also included in the study.	Rankings from the following sources: The Good *Universities Guide* (Australia); *The Maclean's Guide to Canadian Universities*; *The Times Good University Guide* (UK); *The Guardian University Guide* (UK); and *US News & World*	Surveys	Definitions of quality are becoming norms, "converging" (p. 525). "An apparently important contributor to the most effective university rankings is government policy. By specifying the performance indicators that will be publicly available and by subsidizing the development of measures of academic process and outputs, government can help improve the quality of information available to both student consumers and universities" (p. 526).

Author(s)/ Year	Purpose	Sample	Method	Key Findings
		Report, America's Best Colleges		
Post-Graduation Impact				
Andrews & Higson, 2008	To identify "key individual- and business-related skills and competencies required by employers of business graduates and holders of other higher level qualifications, and to discover whether higher education business programmes are meeting the needs of the European marketplace" (p. 412).	30 business graduates and 20 employers from four countries	Semi-structured interviews	The following are the "core components" of business graduate employability: the value of hard business-related knowledge and skills; the importance of soft business-related skills and competencies; and the need for prior work-experience" (p. 420).

The review of the higher education evaluation literature indicated that empirical research concerning the measurement of quality at the postsecondary level has traditionally been internally focused, with the institution self-evaluating, and has relied heavily on student feedback. While student surveys have been a popular tool for use in the assessment of quality, Marsh & Roche (1997) argue it is important to continually review theory, research, and practice in order to ensure that valid measurements are being employed. This position supports the action research process and its attention to not only current context, but also reflection, experimentation, and external stakeholders. By using the CIPP model concurrently with AR, the RSA in this study sought to identify appropriate measures for use in the evaluation of unaccredited institutions.

Accountability

Efforts to improve evaluation are inherently tied to the concept of accountability, defined as "the ability to account for past actions in terms of the decisions which precipitated the actions, the wisdom of those decisions, the extent to which they were adequately and efficiently implemented, and the value of their effects" (Stufflebeam, 1971, p.13). Frink and Klimonski (2004) echoed this perspective, arguing that the objective of accountability is to provide an explanation of the working relationship between two or more parties. Even the word itself "implies the anticipation of an accounting" (p. 9) and thus indicates a need for record keeping and reporting (Frink and Klimonski, 2004). Stufflebeam (1994, 2011) argued that while accountability is necessary to satisfy professional obligations, it could also support external credibility by creating confidence in the objectivity of the evaluators. This trust is created, in part, through stakeholder involvement and meta-evaluations of the institutional evaluation—in essence, an evaluation of the evaluation (Stufflebeam, 2011). Accountability and quality improvement are also intertwined. According to Stensaker (2003), these terms have long been debated as either one in the same or two separate concepts, with accountability relating to external oversight and quality improvement relating to internal responsibility.

At the RSA, institutional evaluation acts as the key vehicle for accountability between the agency and its stakeholders. Evaluations are framed by standards set by state law and agency guidelines. Often seen as increasing governmental accountability, standards-based assessments measure an institution's ability to comply with a specific stipulation (Green, 1994). Typically developed by specialists, standards are used to facilitate evaluation (Stufflebeam & Coryn, 2014). According to Stufflebeam (1994), standards are appropriate for guiding evaluations and further argued, "it is incumbent on professional evaluators to do all they can to live up to the

standards of their field" (p. 333). In order to ensure adequate and comprehensive review, the RSA standards were originally modeled after those used by the regional accrediting body.

The RSA uses its standards to justify decisions made relative to institutional documentation (e.g., catalogs, promotional materials) and institutional structures (e.g., faculty credentials, policies). All postsecondary institutions, accredited or unaccredited, seeking to recruit or offer postsecondary education to students of the state must complete the authorization process and ensure compliance with the RSA minimum standards, as presented in Figure 3. Each of the 12 standards is accompanied by specific guidelines that provide a clear baseline for regulatory compliance. This serves, in part, as an accountability measure. Moreover, because the standards are derived from state codes, their enforcement keeps the RSA accountable to the state government and its constituents.

Figure 3. RSA minimum standards. Adapted from an exhibit within an audit report from the study state's Department of Audits.

Some, however, have criticized standards-based assessments. One criticism is that this type of review often does not require or allow for reconsideration (Green, 1994). Also, the rigid structure associated with standards-based evaluation limits the ability of the assessor to consider context.

Accountability relationships. Government accountability literature concerning higher education regulation often focuses on the relationship between state governments and public institutions and their associated funding policies. Zusman (2005) proposed that the expectation of accountability in these relationships are legitimate due to public spending. Given that the RSA is a government entity bound to multiple parties—including private institutions, students, and state regulators—funding is an important area to consider when examining accountability. Taxpayers support the RSA budget through the state-issued operating budget, though the RSA regularly collects annual institutional fees sufficient to cover RSA operations, which are transferred to the state funds. This exchange of funds, involving all RSA stakeholders, creates a layer of dependence requiring the examination of accountability across all relationships. Figure 4 provides a schema for the key accountability relationships present at the RSA.

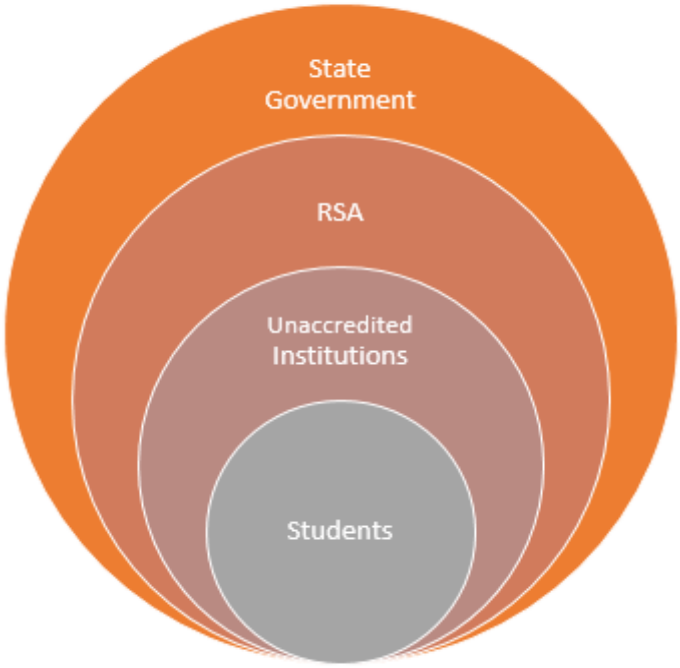

Figure 4. Key accountability relationships present at the RSA.

Attending to accountability in this setting is critical because of the power relationships at play between the regulators and the regulated. This is due to the legal requirement for unaccredited institutions in the state to obtain RSA approval. This study enabled the RSA, as the regulator, to examine and to show cause for its actions and inactions. Additionally, an RSA self-examination of its accountability relationships has the potential to contribute to improved RSA processes and procedures.

Theoretical framework. All regulatory state agencies have a responsibility to their stakeholders to consider how they can most effectively evaluate unaccredited postsecondary institutions. That served as the focus of this project and was achieved through a case study investigation utilizing the action research methodology paired with the CIPP model (Stufflebeam, 1971). This model was selected because of its holistic approach to evaluation, and

over the course of the study, the AR team found it offered opportunities for beneficial isolated examinations of the different organizational components (i.e. context, input, process, and product). By proceeding through the model's quadrants in a step-by-step process, the AR team was encouraged to give focused attention to specific aspects of the evaluation. This resulted in an analytical review of existing practices and, furthermore, a consideration of alternative and/or modified processes. Additionally, because the CIPP model was utilized in concert with AR methodology, the AR team was encouraged to test and assess these new proposals.

Conclusion

This literature review confirmed the importance of evaluation objectives, measurement of higher education quality, perceived value of the CIPP model, and the relationship between evaluation and accountability. Central to evaluation is an objective setting. Because evaluation trends evolve over time and because objectives shift, it is critical for the goal(s) of an evaluation to be defined. Evaluators must also be knowledgeable of the aim(s). This allows for and encourages the logical development of procedures, including guidelines, implementation practices, and impacts of evaluation findings. Furthermore, in a thoughtful planning process, appropriate measures of quality can be determined. The CIPP model offers a framework for implementing this type of in-depth and comprehensive review, and the literature reviewed for this study supported the claim that the model can be successfully applied in a variety of settings (Boonchutima & Pinyopornpanich, 2013; Hurmaini, 2015; Khalid et al., 2012; Mirzazadeh et al., 2016; Mohebbi et al., 2011; Tokmak et al., 2013.) Regarding accountability, the literature highlighted the value of evaluation in developing and maintaining accountability relationships (Stufflebeam, 1971, 1994, 2011). Also critical to accountability, in terms of research validity, is

the presentation of the methods used during the research project and in its analysis. These are described in detail in Chapter 3.

CHAPTER 3

METHODOLOGY

This chapter describes the methodology used in this study, including data collection and data analysis. The purpose of this action research case study was to utilize Stufflebeam's (1971) context input process and product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The following research questions guided the study:

1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts are necessary within the regulatory state agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?

The research questions guided all aspects of the study, including sample selection, data collection, and analytical approach. Table 3 offers an overview of the analysis completed as part of the case study.

Table 3

Data Analysis

Research Question	Sample	Data Collected	Analytical Approach
1. What is learned by an action research (AR) team in the regulatory state agency (RSA) system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?	• AR team composed of five RSA staff and one retired RSA staff person • RSA composed of 12 staff responsible for ensuring that private postsecondary institutions comply with state laws, standards, and rules	• AR team meeting transcripts • AR team exit interview transcripts • RSA surveys • Institutional surveys • Researcher memos, notes, and journal entries • AR team meeting resources (agendas, meeting documents, external publications)	• Coding • Document selection, compilation, categorization, and creation • Constant comparative method
2. What cultural shifts are necessary in the Regulatory State Agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?	• RSA composed of 12 staff responsible for ensuring that private postsecondary institutions comply with state laws, standards, and rules	• AR team meeting transcripts • AR team exit interview transcripts • RSA surveys • Researcher memos, notes, and journal entries • AR team meeting resources (agendas, meeting documents, supplemental information)	• Coding • Document selection, compilation, categorization, and creation • Constant comparative method

Overview of the Design: Qualitative Action Research Case Study

Qualitative research "encompasses all forms of social inquiry that rely primarily on non-numeric data in the form of words, including all types of textual analyses such as content, conversation, discourse, and narrative analyses" (Jackson, Drummond, & Camara, 2007). As opposed to quantitative research, which seeks to measure data objectively, qualitative research

concerns data that are subjective in nature. Recognizing the value of this type of data allows for a deep examination of human behavior and how individuals interact with each other and the systems in which they are situated. As Merriam (2009) stated succinctly, qualitative researchers "are interested in understanding how people interpret their experiences, how they construct their worlds, and what meaning they attribute to their experiences" (p. 5). This type of research is decidedly challenging, however, because qualitative data are difficult to collect, measure, and analyze. Therefore, it is critical to validate the research process and its findings by using specific methodological structures and by providing rich descriptions of qualitative research practices.

Action research methodology, which was employed in this case study, is a type of qualitative research defined by Coghlan and Brannick (2014) as "an approach to research that is based on a collaborative problem-solving relationship between researcher and client, which aims to both solve a problem and to generate new knowledge" (p. 43). Particularly valuable for organizations, action research privileges the work of groups through a "collaborative, democratic partnership" (Coghlan & Brannick, 2014, p. 6). The collective involvement of an action research (AR) team and stakeholders allows for both promotion of and support for positive change. In action research, a strong sense of connection is generated through the recognition of a shared problem. Referred to as "insider action research," this type of research involves the researcher addressing problem as a member of the system seeking to enact change. The notion of an insider connotes a proximity and familiarity with the problem and its context. This proximity promotes trust among fellow team members initiating change because the problem is shared and also encourages members to gain a deeper knowledge of the system under examination. Stringer (2014) highlighted a benefit of fostering an authentic relationship between the researcher and the AR team: "Researchers increase their effectiveness when they immerse themselves in the

richness of group life" (p. 95). This requires the researcher in the action research process to simultaneously work with and observe the team. Additionally, in this dual role, the researcher can examine the case both subjectively (as a practitioner) and objectively (as a scholar). This unique positioning is extremely valuable, especially in qualitative research, which requires that the researcher identify biases and assumptions that can disrupt and/or influence both the project and the study at hand.

Qualitative research addresses concerns of validity by establishing and utilizing methods for collecting and analyzing often hard-to-measure data. This chapter details the rigor applied to the this research, beginning with an explanation of how action research was utilized specifically in the case study. Coghlan and Brannick (2014) offered nine statements for defining the conditions needed to apply action research methodology. Each of these statements is listed below, followed by a brief description of how the statement was applied in the case study:

- "Action researchers take action" (p. 47). Three cycles of interventions were engaged by the AR team.
- "Action research always has two goals" (p. 48), to solve a problem and contribute to science. This study sought to address the context-specific evaluation of unaccredited institutions. Additionally, in Chapter 6, comments and recommendations regarding the study's implications for the larger context, counterpart regulatory state agency evaluations, and postsecondary institutions are provided.
- "Action research is interactive" (p. 48). Unaccredited institutional representatives, RSA staff, and the AR team provided input on the project. This feedback influenced both the actions and reflections of the participants in the study.

- "Action research aims to develop holistic understanding" (p. 48). Action research methodology encouraged a comprehensive examination of both the RSA and the sample group of unaccredited institutions. This was further supported through the use of the CIPP model.
- "Action research requires an understanding of the ethical framework" (p. 48). As the insider researcher, I prioritized transparency with the AR team and RSA staff through member checking, exit interview transcript review, and by providing them with ongoing updates regarding project progress and its impact on the study. Furthermore, I facilitated the project in accordance with IRB approval and dissertation committee oversight.
- "Action research can include all types of data-gathering methods" (p. 49). Multiple data sources were utilized in order to support analysis and generation of findings (described later in this chapter).
- "Action research requires a breadth of preunderstanding" (p. 49). The researcher was employed at the RSA for 4 years at the time of the study's onset. This provided ample experience in the operation and norms present at the RSA. Furthermore, a literature review was completed, and is presented in Chapter 2, to provide in an in-depth understanding of existing applicable research.
- "Action research should be conducted in real time" (p. 49). This study was completed over the course of 12 months and was consistently achieved in alignment with the methodology presented by Coghlan and Brannick (2014).

- "The action research paradigm requires its own quality criteria" (p. 49). The AR team and RSA leadership, versus an external guideline, provided the judgement on the ongoing quality of the project.

The research design guiding this qualitative research study combined action research with a case study. Action research served as the research methodology while the case comprised the evaluation of unaccredited institutions at a regulatory state agency (RSA). The connection of an action researcher to a particular environment as an insider complements a case study approach since this type of research "investigates a contemporary phenomenon (the 'case') in its real-world context" (Yin, 2014, p. 2). Furthermore, both action research and case study research assume that situational conditions create an environment that is unique to a particular problem. The setting also determines access, content, and perspective, as well as available options for development (Stringer, 2014). According to Creswell (2014), case-study inquiries are commonly utilized in the field of evaluation, in part because of their potential to support problem-specific research and improvement efforts. Merriam (2009) also noted the particularistic and descriptive value of case studies. An in-depth account of this action research case study is provided in Chapter 4.

In action research, collaboration creates the momentum for change by encouraging cycles of comprehensive review. In this study, the cycles included the following phases: planning, acting, observing, and evaluating. This cyclical framework provided a chronological path for progress. While action research is iterative, requiring multiple rounds of experimentation, Figure 5 illustrates a single cycle of the action research process used in this study.

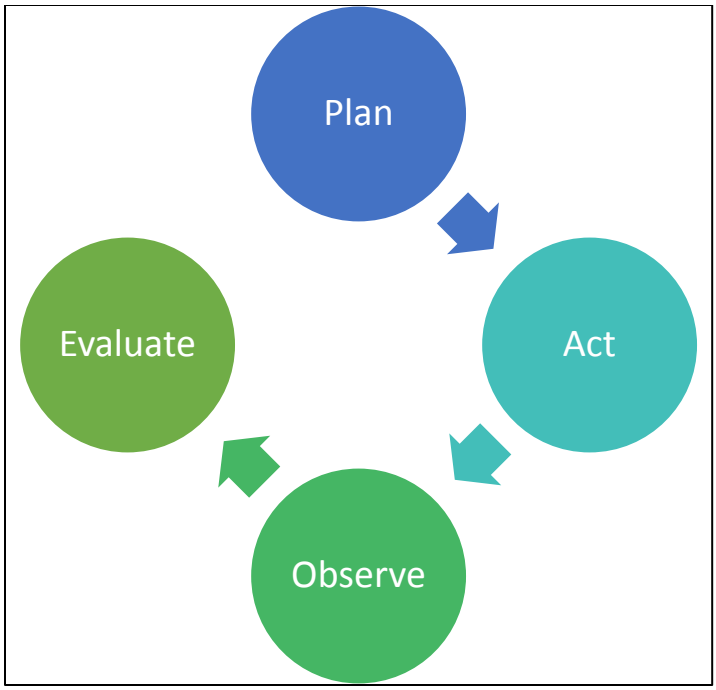

Figure 5. Action research cycle.

Through the completion of multiple sequences of the action research cycle, the methodology allows for an increasingly deep search for solutions to a problem. The action research structure also encourages a systematic review of the investigation itself, allowing each phase to be formally assessed by the individual AR team members as well as collectively through group discussion and debate. In this study, three cycles of action research were enacted over the course of 12 months.

The initial planning phase allowed for the identification and validation of a shared problem: the RSA's use of undiversified evaluations methods. (Chapter 1 described in detail the study problem, the manner in which organizational sponsorship was obtained, and the creation of the AR team.) Adhering to the advice of Funnell and Rogers (2011), during the planning phase, the AR team considered viable options for each phase of the action research cycle. For example, at the first AR team meeting, the members agreed that there were multiple paths for achieving

the objective of improving the evaluation of unaccredited institutions using action research and the CIPP model. These included the potential for interventions focused on institutional applications, RSA review, and/or new information dissemination methods. Chapter 4 outlines the case study, including descriptions of all of the action research cycles engaged in the research.

The action phase of any action research framework pertains to the application of a planned intervention. Interventions are direct actions intended to affect change. In accordance with Coghlan and Brannick (2014), the AR team's deliberations over the course of the project included attention to the appropriateness of each action in relation to addressing the original construction of the problem, the reasonableness of the action taken, and the particular aspects of an iteration that needed to inform the next iteration of an intervention. In this study, the AR team enacted a series of interventions, directed at enhancing the review process of unaccredited institutions seeking to obtain or maintain RSA authorization.

The inclusion of an observation phase offered the AR team an opportunity surveil the interventions put in place as part of the study. This was achieved through individual and team reflections on the actions implemented as part of the study and encouraged critiques and positive assessments of the specific action research cycle. Ideas that arose during the observation phase were then mined for information relevant to future planning efforts during later reflection.

In action research, the evaluation phase allows for a critical assessment of each research cycle. In this phase of the study, the AR team not only considered the previously addressed phases of the CIPP model (either input, process, or product—context was last), but also assessed the results of the intervention(s) put in place during the particular action research cycles. While individual reflection—which Coghlan and Brannick (2014) referred to as "knowing in action" (p.22)—should be an ongoing component of the research process, this phase encourages group

discussion of individual thoughts and opinions related to the implemented changes. This interaction of ideas allows for the development of AR team critiques, which either inform decisions leading to additional iterations of action taken or to conclusions addressing the research questions. Because experimentation in action research is unique to the problem and to the group, findings derived during this stage are context-specific, rather than comprising generalizable, one-size-fits-all answers.

Use of the CIPP Model

The context input process product model, created by Daniel Stufflebeam in 1971, is a framework for implementing a systems-theory-guided program evaluation. Its purpose is to monitor evaluation and assessment in a manner that is comprehensive and inclusive, since review is encouraged by both the evaluated and the evaluators. Stufflebeam (2001) argued that this inclusiveness increases the professionalism of the evaluation. Additionally, the CIPP model promotes a stratified assessment of an entire system, as noted by Zhang et al. (2011), who maintained that the model represents a "systematic comprehensive guiding framework" (p. 62). The model and its four areas of focus—context (needs assessment), input (planning), process (monitoring), and products (measuring and interpreting)—comprised the theoretical framework that guided this research.

Action Research Team Participants

An action research team completed this case study. The team consisted of six RSA staff members, including me (the insider researcher), all of whom participated voluntarily while also fulfilling their contracted job responsibilities as RSA staff members. The one exception was a retired RSA director, who, though no longer responsible for day-to-day tasks, was recruited to offer additional insight into the problem. It was anticipated that his in-depth experience at both

the RSA and in the larger higher education field would offer unique support to the work of the project. Table 4 presents an overview of each AR team member's role and professional experience.

Table 4

AR Team Members

Role	Experience
School Assessment Manager	4+ years in higher education; 3+ years in general education
Director	40+ years in higher education administration
Retired Director	35+ years in higher education; 6+ years secondary education
School Assessment Manager	5+ years in higher education; 1 year in adult education
School Assessment Manager	2+ years in higher education; 4 years in secondary education
School Assessment Manager	20+ years in higher education; 10+ years in administration

The spectrum of experience of the AR team included both years in the field and types of educational settings. Regarding age, associated with years of work, the younger members of the team were valuable assets because each was able to offer novel solutions, questions, and positions in relation to the project. Alternatively, the older members served as significant resources as each shared rich stories, garnered from their experiences, to support their positions. Both were valuable to the work of the project. While experience in higher education pertained to that gained at the RSA, it also included various institutional experiences, which also contributed to the team's progress. Two members had been employed at secondary educational institutions (i.e., middle and high schools). Four members had worked at postsecondary institutions in both the private and public sectors offering different educational credentials (e.g., certificate-granting and degree-granting institutions). Two members had never worked at a postsecondary institution, an equally valuable perspective contributing to the study.

Data Collection Methods

Creswell (2014) stated that data collection in qualitative research involves "setting the boundaries for the study, collecting information through unstructured or semi-structured observations and interviews, documents, and visual materials, as well as establishing a protocol for recording information" (p.189). In this study, data were collected using RSA documents, external publications, meeting recordings, AR team member exit interviews, and institutional and RSA staff surveys, as well as researcher memos, notes, and journal entries. Table 5 summarizes the data collection methods.

Table 5

Data Collection Methods

Type of Data Collection	Study Specific Data
Documents	RSA documents External publications
Interviews	AR team exit interviews transcripts
Meetings	AR team meeting transcripts
Surveys	Institutional surveys RSA staff survey
Observations	Researcher memos/notes Researcher journal

Data were collected based on the needs identified by the AR team (including me) during the planning and evaluation phases. Data collection also occurred as a result of basic research structures, such as problem formation and record keeping. This effort permitted record keeping of chronological progress and positions taken throughout the study. I also recorded observations of unexpected events with the intention of identifying concepts for further reflection and/or

action, and simply to keep track of my perceptions of the study. This chapter details each type of data collection employed in the study.

Documents

Documents can be of great value as data sources in a research study. Bowen (2009) proposed that documents function in five specific capacities: (1) as contextual data, (2) to "suggest some questions that need to be asked and situations that need to be observed as part of the research" (p. 30), (3) as complementary research data, (4) to track progress, and (5) "to verify findings and corroborate evidence" (p. 30). In this research study, I focused initially on internal RSA documentation and external publications (e.g., state audits and media reports) related to perceived weaknesses in the RSA evaluation. I reviewed and assessed these documents to determine whether they were applicable to the initiation of an action research project. This allowed for the study problem to be identified, that the RSA evaluated all private postsecondary institutions, regardless of accreditation status, in the same manner, which may not have represented the most effective assessment strategy. Furthermore, the documents served as supplementary evidence when presenting the research study proposal to the RSA leadership and, later, the AR team. This supported my belief that the problem was worthy of research and an intervention-based investigation. In the RSA case study, the internal document review was triggered by a 2013 initial audit report, which addressed the performance of the RSA at that time.

In my capacity as insider researcher, I completed ongoing document collection throughout the project in support of the monthly AR team meetings. Primary documents included transcripts, agendas, and support materials. All meetings were recorded, and eight of the recordings were transcribed in accordance with the provisions indicated in the AR Team Consent Form (see Appendix A). An agenda was set for each meeting, and any documentation provided

to the AR team was saved both in hardcopy (locked in my office) and electronically (on the RSA server). I compiled support materials based on the perceived needs of the project. For example, during the first AR team meeting, the members determined that data were needed relative to outcome norms within the higher education regulatory field (e.g., accreditation agencies, workforce education groups, and state counterparts). As a result, at the second AR team meeting, I presented to the team information specific to types of outcome data examined by various oversight groups and how that information was used in the approval/denial process for the institution and/or programmatic offerings. In addition to the meeting documents, all RSA physical correspondences (e.g., email messages, letters) used in the study were considered RSA documents for purposes of the research. Furthermore, relevant publications (e.g., RSA annual reports, USDOE press releases) were also deemed documents.

Interviews

According to Yin (2014), interviews are "one of the most important sources of case study evidence" (p.110). They are also beneficial as a data collection method because they can "provide additional information that was missed in observation, and can be sued to check the accuracy of the observations" (Maxwell, 2013, p. 103). Additionally, interview data are useful because they can be "targeted" and "insightful" (Yin, 2014, p. 106). Drawbacks include potential biases related to leading questions, response bias, and inaccurate memories of interview participants (Yin, 2014). Another potential weakness of interviews is that interviewees sometimes practice what Yin (2014) referred to as "reflexivity," whereby he or she "gives what the interviewer wants to hear" (p. 106). Interview questions can also be easily prejudiced by the researcher's own perception and goals (Stringer, 2014). In this study, these potential biases were

countered in part through the completion of a practice interview along with a transcript critique by both my major professor and me.

Following the conclusion of the study in March 2017, exit interviews with research team participants were completed in April and May 2017, in an effort to generate data focused on individual perspectives on the project. The interviews also provided closure to the yearlong project by serving as a clear final activity. Though at the beginning of the study all interviewees were made aware of the need to complete a one-on-one exit interview, they were notified formally again at the end of the study that their commitment would not be satisfied until the exit interview was complete and the transcript reviewed for accuracy. Scheduling for each interview was informal and arranged via email. On each interview date, interviewees were informed that the interview would take place in a private room and were reminded that the interview would be recorded. The interview proceeded according to the protocol included in Appendix B. In qualitative research, the relationship between the interviewer and interviewee is recognized (King, 2004), which influences both planning and protocol development. In this case study, I had worked as a member of the AR team to complete the action research study over the course of 12 months. This meant that the interviewer (the researcher) and the interviewees (the AR team members) knew each other well. To limit influence and distraction, I used certain interview methodologies to guide each interview. For example, as advised by Stringer (2014), I began each exit interview with general questions, then "grand tour" questions (p. 107), followed by more specific questions. Furthermore, to accommodate the open-ended questions, I offered each interviewee ample, uninterrupted time to clarify and expand on his or her thoughts. Given the unpredictably of interviewee responses, a researcher must be willing to react to unexpected answers; because of this, King (2004) argued, "flexibility is the single most important factor in

successful qualitative interviewing" (p.17). In order to prepare for this unpredictably, I developed multiple prompts and also gave myself time to react and consider new questions when interviews changed direction from that planned for in the interview protocol.

Meetings

Monthly AR team meetings provided opportunities for data collection through direct observation and, later, through transcription of audio recordings. Referred to by Yin (2014) as "observational evidence," an ongoing active consideration of the meeting interactions and dialogue can serve as a source of evidence in case study research. In this study, I was mindful about using such data to influence planning, reflection, and assessment of project progress. Collected periodically throughout the study, meeting transcripts were generated from audio recordings of nine of the 11 meetings. The transcriptions were completed by a third-party service, Rev.com, which freed me from having to complete this task myself and also allowed me to create a "fresh slate" for review of the meeting exchanges. One weakness of this process was that typos made by the transcription service often affected the accuracy of transcribed names and contextual acronyms. Also, according to the transcription service provider, there were consistent issues with the audio recordings of the meeting, resulting in gaps in the transcripts. The missing data had to then be sought out by the researcher through additional review of the audio files.

Surveys

In addition to respecting the perspectives of an insider research team, action research also encourages cooperation with stakeholders who have a shared connection to the research problem. In this study, surveys were used to collect feedback from representatives of unaccredited institutions and from RSA staff. . Generally, surveys have the ability to lend an air of esteem to respondents; not only are their opinions valued, as indicated by the simple fact they were asked

to complete a survey, but respondents have the freedom to more independently consider their responses without the influence of a back-and-forth dialogue (as in an interview). Gable (1994) argued that surveys are particularly valuable in case studies for the following reasons: (1) they serve as sources of rich detail; (2) they allow for triangulation; (3) they help to build relationships; (4) they assist in gauging interest; and (5) they aid in identifying alternatives. He also noted that while case studies and surveys are "synergistic," they are "complimented" (p. 11) with experimentation, as was demonstrated in this case study. Though surveys are powerful tools for collecting stakeholder feedback, Gable (1994) noted that they only provide insight into a particular point in time.

While Stringer (2014) noted that "surveys are of limited utility in the first phases of an action research process because they provide very limited information and are likely to reflect the perspective, interests, and agenda of the research" (p. 118), the AR team preferred to collect survey data from the institutional representatives at all phases in which they were involved. Those surveyed were institutional representatives of unaccredited in-state schools that were either authorized or seeking authorization from the RSA. Three surveys were administered to the institutions during the study. The first and second focused on interventions put into place as part of the project, while the third was designed to collect feedback on RSA practices, procedures, and supports. These were administered in May 2016, November 2016, and January 2017, respectively. An additional survey was distributed to RSA staff in January 2017 and sought to collect data about perceptions of the RSA and opportunities for improvement. While at the time it was novel to request "customer service" feedback from both internal and external parties, this type of survey is now administered on an annual basis by the RSA.

All surveys were distributed using Survey Monkey, an online survey platform. A variety of response formats were woven into the survey design: multiple-choice, open-ended, yes/no, and scaled. Only one question in the May 2016 institutional survey (see Appendix C) included a scaled response (i.e., Likert 5-point scale). As recommended by Krosnick and Presser (2010), the questions that appeared at the beginning of the surveys were easier to answer, while the more sensitive questions came at the end. Additionally, questions related to similar topics were grouped together.

Institutional surveys were sent to 114 institutional representatives, each associated with one of the 123 unaccredited institutions authorized by the RSA. The seeming incongruence of these numbers was the result of certain individuals serving multiple institutions. Three items were prioritized in the delivery of the survey and in follow-up communications with the institutions. First, because the nature of the relationship between the RSA and the institutions was one of regulator and regulated, it was important to ensure the anonymity of the respondents. Second, the RSA was explicit about participation being optional. Finally, the agency sought to promote the positive aspects of the study. The introductory email, in which a link to the survey was included, emphasized the intention of the data collection—to inform RSA decision making related to compliance and the enforcement of standards. The AR team hoped that institutions would buy in to the process by providing rich feedback concerning their general opinions of the agency's oversight and regulation, as well as their opinions related to the interventions. At the close of the first survey period, 44 individuals had submitted responses. The second survey, distributed in November 2016, netted six responses, and the third, administered in January 2017, resulted in 21 responses. No submissions were accepted outside of the response period for any of the three surveys sent to unaccredited institutional representatives over the course of the project.

Data Analysis Methods and Procedures

Data analysis entails meaning making (Stake, 1995), and in qualitative research it requires systematic, methodological action. Data analysis in this study was completed using multiple methods as presented in Table 6.

Table 6

Data Analysis Methods

Data Source	Type of Analysis
Documents	Selection, Compilation, Creation, and Categorization; Constant Comparative
Interviews	Coding; Constant Comparative
Meetings	Coding; Constant Comparative
Surveys	Document Creation; Constant Comparative

Constant Comparative Analysis

Data generated during this action research case study were investigated primarily through constant comparative analysis. Originally proposed by Glaser and Strauss (1967), this method includes four stages: "(l) comparing incidents applicable to each category, (2) integrating categories and their properties, (3) delimiting the theory, and (4) writing the theory" (p. 105). The first stage of the constant comparative method encompasses a coding phase, not to be confused with the computer-assisted transcript coding described later in this chapter. According to Glaser and Strauss (1967), coding of this type can be basic and "need [only] consist of noting categories on margins" (p. 106). The intent of this action is simply to categorize data, which will then permit the researcher to proceed to stage 2. This stage involves the comparison of incidents, as presented in the coded data, in order to deduce themes. The third stage comprises the delimitation and refinement of the working theory; this stage results in fewer and fewer

modifications by the researcher following comparisons of new or revised data with the developing theory. Typically used in combination with grounded theory, (Fram, 2013), in which a theory is developed from the data as the research occurs, constant comparative analysis is utilized as the researcher assesses emergent ideas based on previously identified and/or generated data. Boeije (2002) argued that such a review empowers the researcher by providing access to information: "In this way it is possible to answer questions that have arisen from the analysis of and reflection on previous data" (p. 393). In the final stage of constant comparative analysis, the researcher presents the research findings and conclusions (Glaser & Strauss, 1967).

Constant comparison was initiated at the inception of this case study and continued until its conclusion. This ongoing analysis aligned with Boeije's (2002) observation that constant comparison is not linear but rather "can be found in all ... research phases and support[s] the cyclical method in qualitative research" (p. 408). Regular appraisals of the data, in relation to beliefs concerning the progress of the project and potential responses to the research questions, were encouraged through monthly AR team meetings and the guiding framework of the CIPP model. Through a constant comparision of current positions with those held previously, both the AR team and the researcher were able to regularly assess developing theories as the project evolved. The iterative nature of both action research methodology and the CIPP framework paired well with the overarching constant comparative analysis, as all three encouraged multiple rounds of review, critique, and, if necessary, modification.

Documents Analysis

According to Yin (2014), analysis can be achieved by "examining, categorizing, tabulating, testing, or otherwise recombining evidence, to produce empirically based findings" (p. 132). Relative to documents, this was accomplished through selection, compilation, creation,

and categorization, all of which served to organize information for AR team and researcher review. Another analytical technique, coding, was performed to support analysis of all available transcripts, including those from AR team meetings and AR team exit interviews. Lastly, explanation building was employed to connect and compare themes arising from all of the data sources. Each type of data analysis utilized in the study are explained in further detail in this chapter.

As a source of evidence, documentation served not only as the impetus for the study, through a state audit critique, but also as a data source, providing structured record keeping for the project. This form of monitoring comprised research resources, such as AR meeting agendas and researcher memos. I analyzed both selected and compiled documents prior to presenting them as reference materials to the AR team. As a result of the research participants' request for information and later review, these documents supported the planning, implementation, and assessment of the interventions completed as part of the AR study. This process aligned with the recommendation of Miles, Huberman, & Saldana (2013) that data collection and analysis should occur simultaneously. Ongoing analysis benefits a study by providing an opportunity to identify blind spots relevant to the research and by encouraging the generation of interim reports if needed (Miles et al., 2013). Documents were also created to support the AR team. For example, I generated a document comparing RSA outcome data collection efforts with those of counterpart agencies and accrediting bodies.

Categorization was completed in order to organize and analyze the 52 documents used as data sources in the study. Records of each were stored electronically and categorized according to the associated AR team meeting. Emphasizing chronology for purposes of alignment with the AR cycles also permitted easy access to the data. Furthermore, I created and maintained a

document database (see Figure 6) to ensure organized record keeping, which in turn allowed for deeper analysis. This action aligned with Merriam's (2009) suggestion that once documents are legitimized, the researcher should "adopt some system for coding and cataloging them" (p.178-179). The "Action" column in the figure identifies one analytical approach taken relative to the documents. Each was created, selected, or compiled, and analyzed through AR team discussions using the explanation-building technique. "Significance," as I perceived it in my capacity as the researcher, was also included as a column heading, along with key quotes and/or personal notes based on my observations.

Document Database

Title/Year	Team Meeting #	Action	Significance	Quotes/Key Notes
AR Team Meeting #1 Agenda	1	Created	Record Keeping	Problem Framing: 1. RSA evaluates all schools equally 2. Audit indicated RSA should do more to collect outcome data. 3. RSA is now able to focus on continuous improvement
RSA Audit (2013)	1	Selected	Problem Framing	Student outcome data (retention, graduation, job placement, and student loan defaults) is "widely considered to be the best way to gauge an institution's' effectiveness"
RSA Audit Response (2015)	1	Selected	Problem Framing	The lack of emphasis on outcome data was hindering both the RSA's ability to assess institutional effectiveness and "the public's ability to make informed choices."

Figure 6. Data excerpt from document database developed for the study.

As Yin (2014) noted, one of the central benefits of documents as data sources is their stability. Additionally, documents are often easily accessible and, as a result, serve as a cost-effective source of data (Bowen, 2009). Yin (2014) described document-based evidence as "unobtrusive," "specific," and "broad" (p. 106). The concrete nature of documents permits the researcher to verify the authenticity of each, a vital step in document analysis (Merriam, 2009). In this study, this was achieved through citation review and member checks. Weaknesses of documents as data sources include "retrieveability," "biased selectivity," "reporting bias," and "access" (Yin, 2014, p. 106). Although I made efforts to review and present to the AR team a wide range of document-based data, I did practice subjectivity by intentionally choosing resources that aligned with the team's intervention efforts. Potential bias in this area was mitigated, however, by the AR team members, who represented an array of perspectives and experiences. Furthermore, each member was open to sharing his or her opinions relative to the types of documents known to be available and of value for discussion. Such transparent dialogue helped to ensure that appropriate and comprehensive documents were included for analysis. Bowen (2009) argued that "insufficient detail" (p. 31) is another potential flaw of documents. For example, because a document likely was not created to serve the research study they usually do not provide sufficient detail to answer a research question. This weakness notwithstanding, Bowen (2009) maintained that the benefits of documents outweigh their limitations.

Coding

Coding is a qualitative data analysis method whereby the researcher(s) attaches a "symbolic meaning to the descriptive or inferential information" (p. 71) collected as data during the study (Miles et al., 2013). Coding allows data to be compartmentalized, which, according to Stake (1995), enables the researcher to complete a focused examination and comparison of the

coded information. Nine of the 11 AR team meeting recordings and five AR team member exit interviews were transcribed for analysis.

Transcripts of exit interviews and team meetings were uploaded into Atlas.ti, a computer-assisted qualitative data analysis (CAQDAS) software. In order to use of this program, I was required to review and code data manually. According to Creswell (2014), despite the substantial efforts required in coding, CAQDAS software is beneficial as it allows for the manageable search and organization of coded data. Additionally, Atlas.ti made possible the review of codes across documents, which assisted in identification of themes and explanation building for findings.

Initial coding. As a novice coder, I engaged initially in inductive coding, or, as Saldana (2016) put it, coding only what "rises to the surface" (p. 18). Codes were developed through in vivo coding, using verbatim excerpts as codes, and through the use of words and phrases to symbolize the relevance of the data in relation to the study. This allowed for an open review of data, since specific rules did not guide the process; rather, the objective was to identify common subjects. In the social sciences, coding traditionally arises from themes (Creswell, 2014), and coding in this way supported my research efforts to complete data analysis while planning and reviewing the ongoing action research process (Saldana, 2016).

Secondary coding. Coding requires cyclical review and modification (Saldana, 2016), both of which I engaged in as a result of practice and critique. The initial codes and process were insufficient to support the study and its research questions. Following the review of the study's methodology by my major professor, a comprehensive overhaul of the data analysis portion of the study was completed. The modifications focused primarily on the structure of the codebook but also addressed the coding process. This overhaul resulted in the development of systematic

plans for coding, initiated in a manner supported by the guidelines proposed by Maxwell (2013), which state that planning should begin with potential codes being divided into three categories: "organizational," "substantive," and "theoretical" (p. 107). Organizational categories indicate broad topics of interest, which in this study included those specifically tied to the mechanics of the project and to the research questions. Substantive categories are descriptive in nature and attend to participants' perceptions. Theoretical categories indicate "general or abstract" (p. 108) data. This latter category highlights topics that do not necessarily fit into the other two categories but still need further review. Relative to this study, each code listed in the codebook included designations for the research question (RQ), code, code family, code definition, and "Maxwell (2013) Category." Figure 7 displays an excerpt from the study codebook.

Codebook

RQ	Code	Code Family	Definition	Maxwell (2013) Category
1	Context Evaluations	Context (CIPP)	AR Team question or statement focused on context evaluation.	Organizational
1	Input Evaluations	Input (CIPP)	AR Team question or statement focused on input evaluation.	Organizational
1	Implementation Concerns	Interventions	AR Team question or statement focused on potential issues associated with research interventions and implementation of new processes.	Substantive
1	Product Evaluation	Product (CIPP)	AR Team question or statement focused on product evaluation.	Organizational

Figure 7. Example codebook excerpt.

Information regarding the Maxwell (2013) initial coding categories was included so that I could more accurately balance the application of code categories. According to Maxwell (2013), researchers tend to use only organizational categories, thus limiting their ability to analyze their data. Secondary coding in this study also sought to directly address the research questions and to more closely attend to the theoretical framework (i.e., the CIPP model). This coding was completed deductively in order to connect the data to the research purpose and to answer the research questions.

Tertiary coding. Tertiary coding was also utilized in this study. Codes can be applied and organized in a number of different ways. One approach is to consider codes as "variables" that can be separated into "categories" (Stake, 1995, p. 29). This supports Maxwell's (2013) conception of coding as a "categorizing strategy" (p.106). Categorization can also potentially allow a researcher to more accurately identify patterns, which is central to coding analysis. According to Saldana (2016), coding patterns are valuable because "discerning these trends is a way to solidify our observations into concrete instances of meaning" (p. 6). Categories also lead to themes, from which a theory might emerge (Saldana, 2016). The illumination and connection of themes also benefits a research study because it supports a more complex analysis (Creswell, 2014). Figure 8 illustrates a coding workflow and how it can be leveraged for analysis.

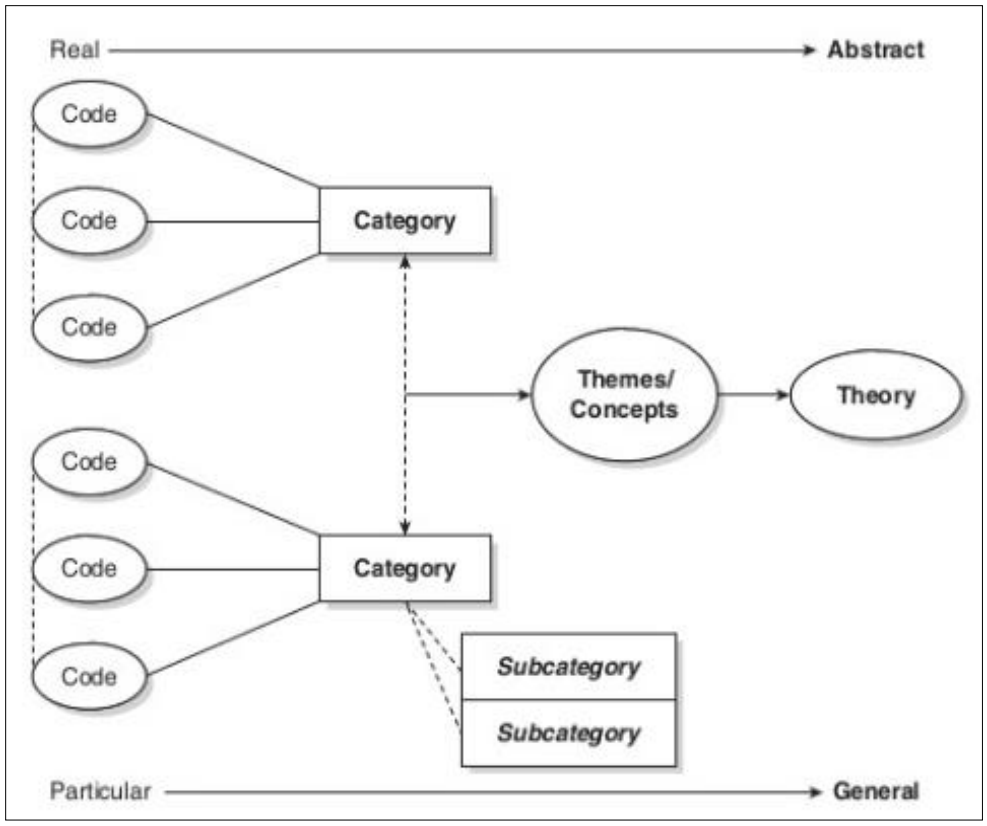

Figure 8. A streamlined codes-to-theory model for qualitative inquiry (Saldana, 2009).

Table 7 represents an adaptation of the codes-to-theory model (Saldana, 2009) specific to this action research case study. The order of codes presented aligns with the timeline of the project, with problem definition serving as the first focus of the AR team followed by an examination of RSA culture. The "Theory" item in Saldana's (2009) model was excluded since this will be presented as findings in Chapter 5.

Table 7

Code Analysis Table

CODE	CATEGORY
Problem Perception	Problem Definition
Project Object CIPP Clarification Data Collection Suggestions	Project Planning
Context Evaluations	Context (CIPP)
Input Evaluations	Input (CIPP)
Process Evaluations	Process (CIPP)
Product Evaluation Outcome Data Collection Benchmarks Value of Outcome Data	Product (CIPP)
CIPP Clarification	CIPP
Implementation Concerns	Interventions
Perception of Unaccredited Institutions Perception of RSA Role Problem Perception	AR Team Perspective
Culture Shift RSA Culture Before Project RSA Culture After Project	Culture

In this study, Saldana's (2009) codes-to-theory model served as a framework for organizing the final 22 codes created and classified in Atlas,ti. This allowed for a more accurate and efficient assessment of themes arising from both inductive and deductive coding—and thereby played a powerful role in the illumination of the study's findings.

Survey Analysis

Analysis of the institutional surveys used in this study was completed immediately following receipt of each survey. As noted earlier, surveys were distributed to representatives of unaccredited institutions in May 2016, November 2016 (Appendix D), and January 2017 (Appendix E). Another survey was provided to RSA staff in January 2017. While the staff responses to the survey were provided only to RSA leadership, I compiled the responses to the institutional surveys by transferring data from SurveyMonkey (by cutting and pasting responses) into a document. Each set of responses from the three surveys was then presented at the next AR team meeting for review and discussion. Completed primariliy though collaborative analysis, this activity sought to understand, assess, and consider institutional input for use in applying the CIPP model. I also completed an individual analysis of survey data in my initial review of the results, a process that influenced the development of the upcoming agenda for the AR team meeting, based on the direction I expected discussion to take following the data review. Analysis of the data was completed initially through the creation of a document for presenting the data. A constant comparative meta-analysis was then performed to connect the results with those generated at other stages of the study.

Trustworthiness

Trustworthiness is key to the reliability and credibility of research. According to Miles et al. (2013), reliability is the degree to which the researcher takes "reasonable care" (p. 312) to ensure that a study engages in consistent processes and maintains relative stability. Credibility is the extent to which a study and its finding are believable, based on the methodology used. One way to support trustworthiness is by maintaining a chain of evidence, which increases the reliability of the information presented as part of the study (Yin, 2014). Convergence of

evidence is another strategy suggested by Yin (2014) for strengthening the construct validity of a case study. For this research, an electronic folder was used to save and maintain evidence associated with each AR team meeting, and these data were then analyzed for connections to themes related to the overall research findings. Triangulation, or the convergence of evidence, refers to the collection and comparison of information from different sources to determine if the same findings arise from each (Maxwell, 2013). In this study, this was achieved through the use of multiple sources of evidence in order to support the findings (presented in Chapter 5).

Trustworthiness is also supported through attention to insider dilemmas, namely valid information, free choice, and internal commitment (White & Wooten, 1983). The use and generation of valid information is critical to both the external and internal perspectives of the research. Dissemination of valid information is particularly paramount for government entities. For this case, it was necessary to support a credible internal review of the AR processes because without confidence that correct information was being collected and presented, the RSA could not take appropriate action on behalf of its stakeholders. In accordance with the need for member checks (Creswell, 2014), informational accuracy was addressed through group review of all supporting documentation presented to and generated by the AR team. Transcripts of AR team member exit interviews were also provided to each interviewee in order to ensure that transcribed responses were correct. Additionally, each member was given the opportunity to request the redaction of his or her transcript. Only one member offered revisions for clarification, and none requested removal of content. The concept of free choice, as presented by White and Wooten (1983), was particularly relevant to the RSA and its implementation of change related to institutions because of its legal obligation to abide by policies and procedures. In this study, free choice was applied by ensuring members of the AR team that their participation was optional.

This was also extended to institutional representatives and RSA staff who were offered the opportunity to comment on the study. Internal commitment to the project, the third insider dilemma, was reinforced by the initial need for the project to respond to a 2015 final audit report regarding the RSA. One of the key recommendations of this report was that the agency should collect and report outcome data for all authorized institutions; however, no such data were available for the unaccredited institutions. While this study examined the entire evaluation process, a plan for implementing outcome data collection was included in the first cycle of the project. In addition to enabling the RSA to respond to external authorities, the project also provided a sense of ownership for the agency because change and decision making came from within, in contrast to forced action made in response to outsider (e.g., auditor) perceptions of what quality should like. This directly supported internal commitment. Action research enhanced the RSA's capacity to take control of the problem, to work with it, and to propose and enact solutions deemed to be most appropriate and informed by data and research findings.

Validity, a measure of the strength of findings in relation to a study, is another concept associated with research trustworthiness. Creswell (2014) proposed eight strategies for ensuring validity in qualitative research: triangulation; member checking; rich, thick description; clarification of researcher bias; presentation of negative or discrepant information; prolonged time in the field; peer debriefing; external audit (pp. 201-202). The ways in which each strategy was applied in this study is described in the following list:

- Triangulation: Use of action research and CIPP model methodologies.
- Member checking: AR meeting discussions; transcripts of exit interviews provided to each AR team member for comment/redaction.
- Rich, thick description: Case study chapter; dissertation.

- Clarification of researcher bias: Subjectivity statement; ongoing awareness of the influence of researcher's perceptions.
- Presentation of negative or discrepant information: Literature review and findings chapters; AR meeting discussions.
- Prolonged time in the field: Research had been employed at RSA for six years and spent one year dedicated to project.
- Peer debriefing: AR meeting discussions.
- External audit: Regular review by major professor, dissertation committee, and other faculty.

Constant comparative analysis is another method for supporting research validity (Boeije, 2002). That is, validity is reinforced through the researcher's focus on performing an ongoing assessment of beliefs and assumptions relative to emerging theories. This method was engaged throughout the study, serving as the predominant analytical practice.

Subjectivity Statement

The action research methodology requires subjectivity to support context specific interventions and solutions unique to the problem. While natural, innate biases and assumptions are especially forceful in internally generated change initiatives and, as such, the researcher must be cognizant of these and how they affect the study. My particular subjectivity was filtered most dramatically through my perspectives as a woman, as a novice researcher, and as a young state regulator. Most important of which was my age, and accompanying experience. At the start of the study I was twenty nine, and relatively green (4 years) to the field of evaluation and regulation. This made me hopeful, ambitious, and excited to seek out positive change. I was not worried about experimenting with new practices as I viewed those in place as outdated, given

their use since the early 1990s. Furthermore, my natural pride caused me to want more for the RSA and I sought to see its reputation improve. This was especially so given the poor audit and news coverage that had greeted me early in my career at the RSA. While I was intimated by the research methods required of a doctoral level study, I was not concerned that I would fail or that I would regret my efforts to enhance evaluation of unaccredited institutions. This ego was beneficial to the study in that it encouraged commitment to the project. It also created a confidence that the project was bound to be positive for both the unaccredited institutions and the RSA. Thus, while my personal viewpoints and experiences created a subjective lens, innate in qualitative researcher, I believe they generated energy and high expectations into the study. Additionally, my youth encouraged an openness to fresh perspectives that may have been more difficult should I have been more settled into particular evaluation and/or communication practices.

In this case study, I relied on Coghlan and Brannick's (2014) three insider dilemmas to help identify three areas likely to be influenced by the subjective nature of action researcher: preunderstanding, access, and role duality. Preunderstanding refers to the knowledge, experience, and potential biases the researcher brings to the project as a result of being an insider to the problem and the project. Relationships between and among AR team members represents one example of a potential preunderstanding factor that impacted the study. The positive or negative feelings of members, relative to each other, the purpose of the project, or the process of the project itself, may also impact the study. As such, I made efforts to remain aware of this possibility so that I could monitor its influence. Journaling is another method, recommended by Coghlan and Brannick (2014), for reflecting on—and therefore monitoring—preunderstanding. Another insider dilemma offered by Coglan and Brannick (2014) is access. This pertains to the

implicit permission granted to the researcher to enact change from the inside. Access includes the ability of the researcher to enter the system, through "primary access," and to engage with the system (e.g., people, data, meetings), through "secondary access" (Coghlan & Brannick, 2007, p. 67). In this study, both levels of access were secured through the Organizational Sponsor Agreement, which was agreed to by both the RSA executive director and deputy director (the sponsor). Lastly, Coghlan and Brannick (2014) refer to the insider dilemma of role duality. This is the skill the researcher embodies in order maintain integrity as both a researcher and employee. In this study, this was challenging when it came to ongoing analysis. When I shared my thoughts I was mindful not dominate and guide the beliefs of others, as could have easily occured as result of my guiding role as the researcher. During AR team meetings I participated as a member but focused my energy on facilitating the dicussions between the others. In this manner, I served more as a project manager, a responsibility typical of an employee. In the interim, between meetings, I transitioned into a researcher position, studying and developing materials for both the project and study. This shifting process allowed me to participate in the capacities necessary for both serving as a researcher and employee.

Conclusion

Qualitative research recognizes the centrality of humans within a system. Its methods empower researchers to complete studies of individuals and groups to gain insight and understanding. Action research methodology offers researchers unique supports that serve to not only generate new knowledge but also enact and manage change. This chapter presented the robust methodogical actions that supported this study. Data focused on providing insight into the research questions were collected from multiple sources and analyzed in alignment with qualitative research literature. This information supported the actions taken as part of the case

study, presented in Chapter 4. Furthermore, the methodology connected the overarching explanation building utilized to identify the findings, presented in Chapter 5.

CHAPTER 4

CASE STUDY

According to the U.S. Department of Education (USDOE) (2017), "the goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality." If accreditation is equated with "acceptability," what does this suggest about unaccredited institutions? In the United States, the determination of such adequacy is made by individual states; each has the authority to control what types of schools are allowed to operate within its boundaries and also which are allowed to recruit and/or instruct via online delivery. State oversight includes evaluation methodologies and the extent to which different categories of schools can be held accountable through distinct application processes and regulations. Examples of categories of postsecondary institutions at the regulatory state agency (RSA) that served as the focus of this study include those with legal exemptions (e.g., religious), those comprising various programmatic levels (e.g., certificate, associate, doctorate), and, of critical importance for this study, those with different accreditation statuses (i.e., accredited or unaccredited).

The purpose of this action research case study was to utilize Stufflebeam's (1971) context input process and product model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. Coghlan and Brannick's (2014) action research model provided the methodological base, while investigation and experimentation were guided by the following research questions:

1. What is learned by an action research team and a regulatory state agency system as a result of applying accountability approaches to the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts are necessary within a regulatory state agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?

Background

Unaccredited postsecondary institutions are unique, both in how they are recognized and overseen, because of their exclusion from the Higher Education Act, which provides federal guidelines for postsecondary activity and postsecondary regulation in the United States . By using accreditation as an indicator of legitimacy, the federal government, namely the USDOE, implies that an institution offering formal education to those after high school should be accredited. This was exemplified in a 2004 U.S. Government Accountability Office report addressing "diploma mills and other unaccredited schools" (Cramer, 2004, p. 1). The grouping of these two categories of institutions infers that any school operating without accreditation should be subject to skepticism and scrutiny. The federal government exhibits this undervaluation, for instance, by prohibiting federal employee reimbursement of tuition for instruction received from unaccredited schools; moreover, credentials earned at unaccredited institutions are also not considered in the hiring or promotion of federal staff. One potential issue with this narrow view of what qualifies as a postsecondary institution is that unaccredited institutions are legal, and there is no federal requirement for institutions to seek accreditation. As discussed earlier, states vary in their rules regarding unaccredited institutions, but in the state where this study took place, unaccredited institutions can offer certificates through doctoral-level programming.

Because the distinction between accredited and unaccredited institutions can be quite influential, in terms of an institution's ability comply with regulation, this study considered what, if any, variations are appropriate for use in the evaluation of unaccredited institutions in particular.

Historically, accreditation status had not been a key concern in institutional evaluations administered by the RSA upon which this study focused until 2013, when an initial state audit of the RSA proposed that the agency should collect and report outcome data (i.e., graduation, completion, and placement rates) associated with all authorized programming. The USDOE requires this information annually for accredited institutions to maintain eligibility for federal financial aid. It is also made available to the public on the Integrated Postsecondary Education Data System website, published by the National Center for Education Statistics of the USDOE. Prior to the audit report, the RSA had directed all outcome-data inquiries to this site, which was considered sufficient since the majority of RSA-authorized institutions were accredited. Furthermore, these institutions typically garnered the most questions because of their high student enrollments and, as a result, large disbursements of federal financial student aid.

The final audit report, released in 2015, and the resulting internal discussion regarding methods for determining educational and fiscal stability, revealed a paucity of data concerning the RSA's efforts to investigate the evolution of its institutional evaluation process. Certain methods criticized by auditors had been in practice since the inception of the RSA and had typically only been modified in response to external requirements, such as new review procedures mandated by the USDOE. The limited number of change projects was affected greatly by factors outside the control of the RSA, including budgets (for staffing and technological upgrades) and binding legal codes. The state code, which created the agency and provided an outline for RSA responsibilities, can only be changed through legislative action. As

a result, the RSA has tended to be more reactive than proactive because the promotion of code revisions can put the agency at risk for unexpected legislative action. However, one potentially positive aspect of this rule making process is that the code does provide the RSA Commission with the authority to establish rules and regulations.

The last half decade has seen increases in the RSA budget around change initiatives, including the development of a new online recordkeeping database, an electronic application portal, and an upgraded website, all of which provide an improved platform for initiating improvement measures at the RSA. Specific to this study, the enhanced information technology systems now in use at the RSA allow for easier access to data, while the online database facilitates the recording of more accurate and consistent information throughout multiple sources (e.g., website, internal institutional records). These upgrades have also improved RSA's capacities for comparing data, running reports for specific institutional components (i.e., programs, locations, and accreditation status), and streamlining application workflows. While the earlier outdated internal RSA structures would have been potentially insufficient to support this study, those currently in place effectively supported the agency as it sought to investigate, develop, and implement improved assessment measures.

Context

The context for the study included both micro and macro settings. The micro setting, the RSA, comprised the immediate environment in which the project took place. The macro setting, the national higher education regulatory environment, was crucial to understand in terms of trends and how they impact oversight. In the United States, postsecondary education is overseen primarily by three different entities: the accreditor(s), the federal government (USDOE), and the

state(s). Figure 9 illustrates "the triad," which refers to the current system of regulatory oversight of postsecondary education.

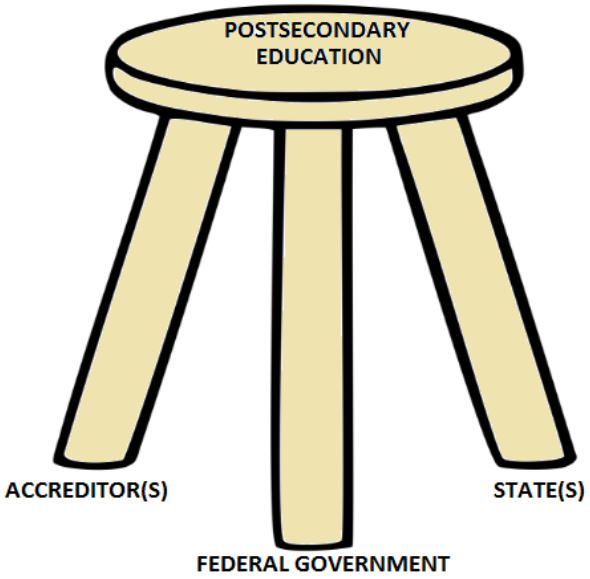

Figure 9. The regulatory triad.

The triad is also known as the three-legged stool because of the need for all three overseers to ensure both balance and functionality of the system (i.e., the stool). Each leg is intended to provide a checks-and-balances system for the others, amounting to a vetting of the institution from three different angles. Accreditors tend to focus on stability, achieved through financial review and curriculum evaluation. The federal government examines policy compliance, reviews accrediting agencies, and approves student aid funding. States vary in their oversight but typically require institutions to meet a certain level of compliance with standards related to both the institution and its programs. A key role of the triad is its relationship to the Higher Education Act, including specific mandates related to institutions, state authorizing agencies, and accreditation groups. For example, accreditation groups must set standards, submit

reports, and apply for renewal at least every five years, as mandated by the Higher Education Act (Cramer, 2014).

Postsecondary education in the United States includes instruction in a wide range of vocational and core curriculum areas, culminating with the awarding of certificates and degrees. In addition to curricular content and program level, instructional methods, institutional business structures, accreditation status, and state compliance standards vary widely throughout the nation. The state in which this study took place categorizes its oversight of postsecondary education into three state entities: (1) public state colleges and universities, (2) public state technical colleges, and (3) all private educational institutions. The agency responsible for this last group—private educational institutions—provided the micro setting for the study and is referred throughout this dissertation as the regulatory state agency (RSA).

The RSA is a nonpartisan state agency responsible for the regulation of private postsecondary institutions within the state as well as for all out-of-state postsecondary institutions that choose to be physically present, either through locations, active recruiters, advertisements, or online offerings, within state borders. Established in 1990, the RSA arose out of state legislators' concerns about the potential instability of the growing number of proprietary schools and was tasked with ensuring that authorized nonpublic postsecondary educational institutions were educationally and financially sound. As a result, the RSA assesses all private-certificate and degree-granting institutions. Its mission calls for the agency to promote systematic improvements in regulating these institutions, with a focus on quality improvement, which directly aligned with the objective of this study.

Responsibilities of the RSA

The RSA completes annual institutional reviews and assessments of any programmatic or substantive institutional changes for roughly 300 fully authorized schools, only 124 of which are unaccredited. Additionally, there are approximately 175 private institutions in the state that have been granted exemptions under the law; thus they have a narrowed scope of RSA oversight and, as a result, are required to submit simplified annual applications. Examples of types of RSA exemptions include accredited schools that were in existence prior to the establishment of the RSA and schools overseen by another state agency, such as cosmetology schools, which must also apply to the state's Board of Cosmetology.

The Research Team

The participants in this study included the Action Research (AR) team members and the RSA staff. AR team members participated voluntarily in addition to their contracted job responsibilities. The one exception to the dual roles of the AR team members was a retired RSA director; though he was no longer responsible for day-to-day professional tasks, he willingly provided insights into the research problem and participated in the experimentation process. The RSA staff commented on research Team propositions and actions as part of their roles as employees. These comments were collected primarily during office meeting discussions, where information about interventions affecting institutions and/or agency processes was shared. It is important to note that transparency was maintained with the RSA staff throughout the project; in addition to formal meetings, ongoing informal communication with agency colleagues occurred during all stages of the study.

The development of the AR team involved multiple rounds of invitations to participate in the study. Recruitment was based on each potential member's experience and involvement in

institutional review, either as an institutional participant or as a review specialist. As a result, all RSA professional staff were initially invited to join the AR team. This ensured an initial openness of the project which presented transparency; it also allowed me, as the researcher, to encourage maximum RSA participation. The potential team capacity was limited, however, because of the small number of professional RSA staff. Four of the eight RSA staff invited accepted the invitation to commit to the 12-month research project.

Initial recruitment efforts also encouraged the involvement of outsider experts. This was supported by the organizational sponsor, who took an active role in suggesting prospective outsider AR team members. All individuals recommended by the sponsor were emailed on two occasions to invite them to participate. Of the four contacted, three did not respond, and one accepted the invitation. Unfortunately, the outsider expert who initially accepted later resigned (prior to the initiation of the study) due to other professional commitments. As a result, the final AR team consisted solely of internal stakeholders.

The Sample: Unaccredited Institutions

In comparison to accredited postsecondary institutions, unaccredited institutions are under-regulated. Accredited institutions must first be authorized in their home state prior to seeking accreditation. Following state approval, they must submit to the accreditation application and approval processes. Subsequent to accreditation approval, most institutions then seek access to federal student aid. Unaccredited institutions, alternatively, are typically only responsible to rules and governance by the state in which they operate. In an effort to address this relatively limited oversight, the current study focused solely on unaccredited postsecondary institutions. For the purposes of this research, the term *unaccredited* is defined as lacking accreditation by a USDOE-recognized accrediting body. Student enrollment, amount of tuition and fees collected,

programmatic offerings (including degree level), and history with the RSA all had no effect on whether or not each institution was included in the sample. Accreditation status and RSA authorization oversight were the sole factors used to distinguish the sample population from the total group of postsecondary institutions regulated by the agency. At the beginning of study, in March 2016, there were 123 unaccredited institutions authorized by the RSA. Of these, 10 offered degree programs only (as opposed to offering certificate programs or offering both certificate and degree programs).

The programmatic offerings of the sample institutions varied widely. Further distinctions included a number of institutional components such as student population, outcome data (e.g., industry placement norms), and additional oversight from other groups (e.g., the Board of Massage). Figure 10 provides a breakdown of institutional programs by type, including level (i.e., certificate and degree). "Religious and General Studies Certificates and/or Degrees" was grouped together since all institutions in the category offered programs in both content areas. When fewer than four institutions offered a particular type of training, such as dog trainer education programs, they were included in the "Other" category.

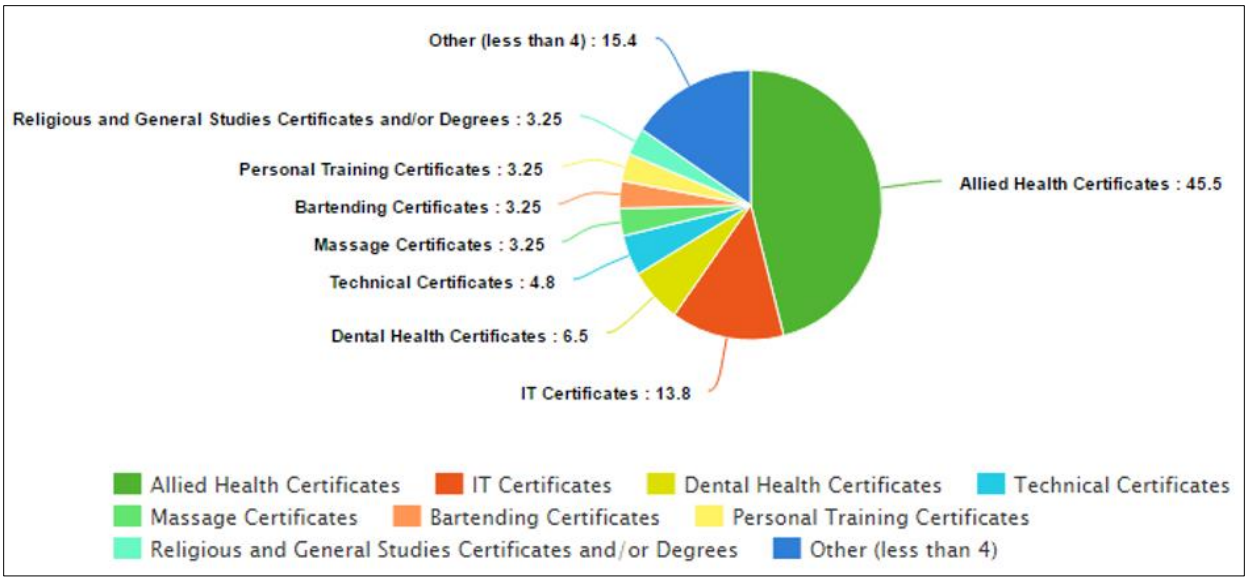

Figure 10. Type of program by RSA unaccredited institution (May 2016).

Stakeholders

Through individual consideration and group discussion, the AR team determined that the stakeholders included the following: the state government, the RSA, unaccredited authorized institutions, and students interested in or attending these institutions. A key feature of all of these stakeholder groups was their proximity to the project and its interventions. The internal stakeholders, those most directly impacted by the study, were the RSA, including its staff, and the unaccredited authorized institutions. The external stakeholders included the students and the state, which represented the governmental structure responsible for developing and maintaining the laws and purpose of the RSA. While internal stakeholders were contacted for comments on the research interventions put in place as part of this study, no external stakeholder was directly involved in the project.

Story and Outcomes

This case study generated a story of growth and the impact of perspective and its influence on opportunity, illustrated through the metaphor of a tree sitting by water. Viewing the tree from the proper angle and at the right time allows the spectator to see both the tree and its reflection on the water, such as is presented in Figure 11. This vantage point presents not only the appearance of connection between the tree and its reflection, but also a chance for the viewer to recognize an expanded environment in which the tree is situated.

Figure 11. The expanded tree metaphor.

Early in the research project, this tree metaphor was used among the RSA leadership and the AR team to describe the unaccredited institution as an individual system. In that scenario, the tree was presented as the institution, with the roots representing inputs, the trunk the process, the fruit the products, and the surrounding environment the context. This representation allowed the RSA staff and the AR team to consider opportunities for growth in the evaluation of

unaccredited institutions that could be achieved by attending to the holistic nature of the system's components (i.e., the quadrants of the CIPP model: context, inputs, process, and products).

While the use of a tree to symbolize institutional evaluation is still appropriate, over the course of the development of the written case study, I came to understand that the project was not limited to an examination of the institutional system but had expanded to include a reflection on the RSA system. This evolution was triggered by a need for the RSA to evaluate its own components in order to best accommodate the shifts necessary to enhance the evaluation of unaccredited institutions. Regarding the tree metaphor, this meant that the reader would have to step back and examine not only the tree but also the reflected tree. This reflection represents the RSA as separate system, attached but comprising a unique organizational makeup.

The ability to examine the system from this angle, which included both the RSA and the unaccredited institutions, was made possible through the use of the AR methodology. This methodology which challenges groups to thoroughly explore a problem in an effort to promote positive change. Furthermore, it allowed the AR team to dive deep into particular aspects of the case study while concurrently creating some distance from the problem by acknowledging that the issue would require several rounds of assessment. In AR, this is achieved through iterative cycles of review and experimentation. Each cycle of intervention included attention to the AR steps: planning, acting, observing, and evaluating. However, I created a modified version of the AR model developed by Coghlan and Brannick (2014). Their version proposes that AR should begin with construction and then proceed through cycles of planning action, taking action, and evaluating action. By including observation as its own stage in the research process, research Team and I (the novice researcher) were able to ensure space for unobstructed viewing of the interventions. Through three cycles of interventions, presented in Figure 12, the AR process

guided the Team in its experimentation with and evaluation of appropriate measures for evaluating unaccredited institutions.

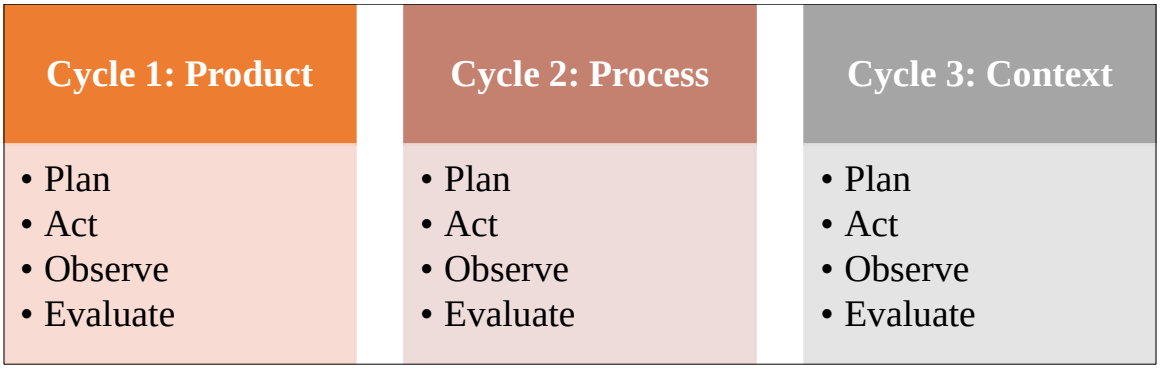

Figure 12. RSA Research Cycles with AR Steps.

Cycle 1 was initiated following a construction phase spurred by a final audit report of the RSA, published in the spring of 2015. This report, created by the state audit department, indicated that the RSA should make institutional outcome data available on the agency's website and use this information in the evaluation of regulated institutions. While these data were available for accredited institutions through a USDOE database linked from the RSA website, they were unavailable for unaccredited institutions because the RSA did not collect outcome data from any of its authorized institutions.

As a result of the audit report, and the poor media coverage that followed, the RSA leadership determined the collection of outcome data from unaccredited institutions would now be required. As the researcher, I was tasked with developing a process for addressing the collection and publication of the outcome data for all institutions authorized by the agency. In order to enhance the robustness of the action research, I sought to expand the project to include an overall critique of the existing evaluation methodology particular to unaccredited institutions along with experimentation with new evaluative practices. Because of its empirically based

success in program evaluations (Boonchutima & Pinyopornpanich, 2013; Hurmaini, 2015; Khalid et al., 2012; Mirzazadeh et al., 2016; Mohebbi et al., 2011; Tokmak et al., 2013; Zhang et al., 2011) and its strong alignment with action research—with its emphasis on iterative change processes and stakeholder involvement—the CIPP model (described at length in Chapter 2) was selected as the conceptual framework for the project.

With support from the future project sponsor, I developed the project proposal, which was accepted by the RSA's executive director in May 2015. This type of project, both in-depth and utilizing an extended timeframe, was novel for the agency. As evidenced by earlier responses to the audit reports, the RSA had tended to be reactive regarding quality improvement initiatives. I felt there was excitement and anticipation around the process and its findings—sentiments shared through conversations that encouraged research action and change efforts. The expected project start date was September 2015; however, due to planning delays around institutional review board approval, AR team recruitment, and general researcher readiness, the project was not initiated until March 2016. Fortunately, the delay did not affect the projected 12-month timeline, and the project concluded in March 2017.

Evolving Perspectives: The AR Project

The AR team was committed to the project and over the course of 12 months actively pursued its objective to explore, test, and implement appropriate measures for use in the evaluation of unaccredited institutions. This was achieved through a partitioned application of the CIPP model. That is, instead of using all four of the model's quadrants (i.e., context, input, process, and product) in each cycle, the AR team determined that it would be more appropriate to focus on each quadrant separately, while simultaneously considering the system as a whole. In this case study, the system consisted of the institution and its evaluation by the RSA. This meant

that while individual interventions centered on a particular quadrant, the planning and reflection phases attended to the eventual interaction with the three other quadrants. Each AR cycle presented in this chapter is titled in accordance with the primary aim of the intervention enacted.

Product Evaluation Dimension (Cycle 1)

It is natural for systems, whether biological or human-made, to create products. In relation to an institution, example products include revenue, jobs, and curricula. For the purposes of this study, the product of central attention is the students. Students include potential enrollees, active students, graduates, and those who withdraw and/or are dismissed from the institution. The first cycle of this AR study, the product dimension, aimed to identify relevant product features that potentially affected the institution's RSA evaluation.

Plan. In order to quickly address the audit recommendations and initial intent of the project sponsorship, the first iteration of this AR cycle addressed the product quadrant of the CIPP model. This effort was of great importance to the RSA leadership, as well as the researcher, because the audit recommendation to collect and publish outcome data had not been acted upon by the agency for two years. The creation of the AR team marked a major shift because the RSA had committed to providing the research and development support needed to address this issue. In addition to satisfying the audit, it was noted by one AR team member that the study had the potential to generate positive state-level support for the RSA, whose reputation had been damaged by the audit publications: "*The better we can prove we're [fulfilling the agency mission], the better position we're in to be supported*." This was an early indication of a cultural shift toward proactive internal quality enhancement efforts. Cycle 1 planning, beyond the audit requirements, was initiated through AR team discussion centered on the AR methodology, data collection, potential interventions, and the decision-making process.

One initial asset of the project was the commitment and willingness of the AR team to experiment. Specific to the CIPP model, the team recognized its potential strength early on in the project. As one AR team member expressed, that was a "*logical schema*." Another member noted that it "*seems to be a good universal model to use*" and that the model "*was an excellent way to look at this*." This positivity helped to jumpstart the project and its initial data collection. Data determined to be valuable to Cycle 1 actions by the AR team were sourced from internal RSA documents, AR team materials, and institutional and RSA staff feedback collected though AR team requests. Examples of the mechanisms agreed upon for collection of feedback included a counterpart request for comment, an institutional survey, an institutional information session, and RSA meeting discussions concerning Cycle 1 interventions. Following the review and discussion of the data, the AR team determined that appropriate interventions would include not only collecting outcome data and publishing it on the RSA website, per the audit recommendation, but also presenting it to students upon enrollment. This was achieved through the use of a student disclosure form. Additional information included on this form was intended to inform students about topics that were commonly confused or overlooked. Examples of these included a definition of accreditation, presentation of key RSA policies, and information related to job placement assistance.

Progressing through the first three AR team meetings occured seemingly quickly as I focused on educating the AR team on the CIPP Model and AR, as a methodology. Furthermore, the Team jumped into planning for outcome data collection, as this was encouraged by the RSA executive leadership. Yet, by the fourth meeting the AR team was able to step back and review the CIPP model holistically. With the aim of improving accountability and alignment with the CIPP model, the AR team used this meeting to identify potential RSA evaluative components

that could be categorized into each CIPP quadrant (context, input, process, and product). This was initiated and guided by utilizing the CIPP evaluation model checklist (Stufflebeam, 2007). As a result of the dialogue the checklist generated, the AR team was able to agree on a list of items that allowed for the development of an RSA-specific CIPP model (see Figure 13). As a planning and monitoring tool, this model offered the AR team a reference for both potential future actions as well as actions already addressed through previous interventions. Furthermore, it provided an image for representing a holistic view of the institutional evaluation process.

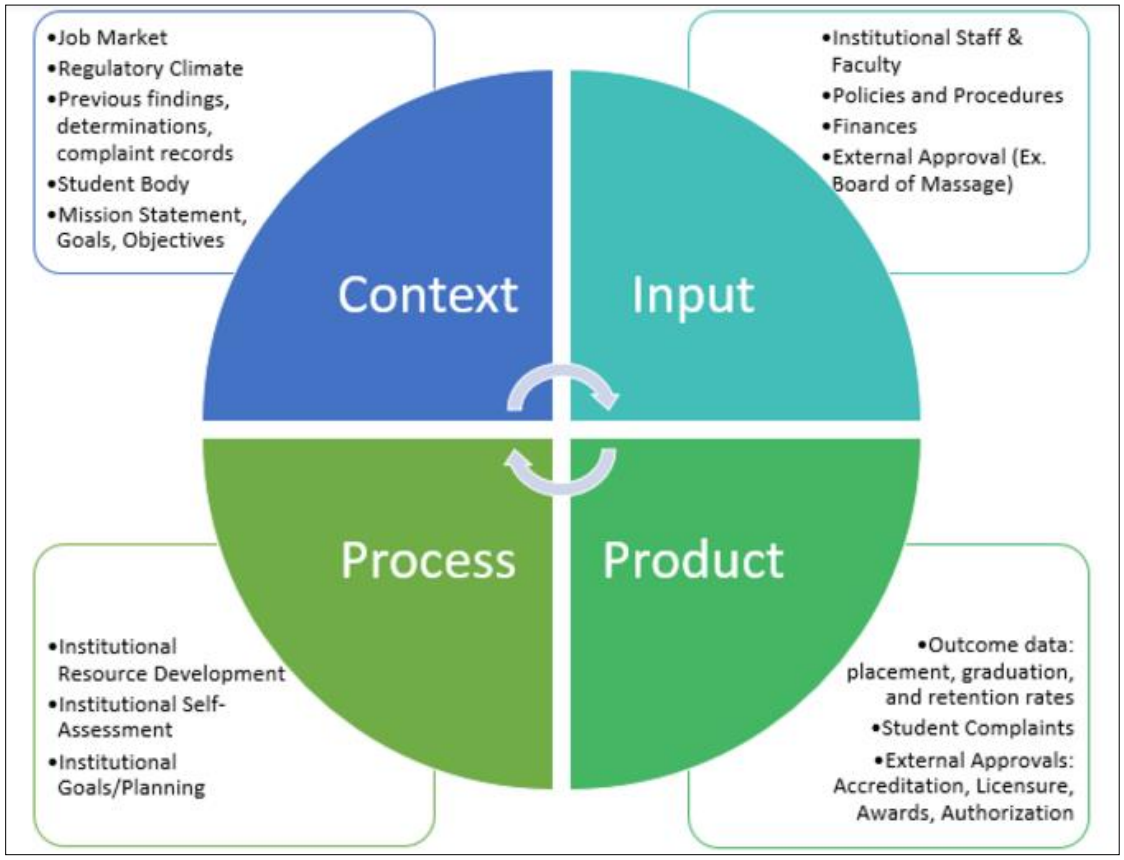

Figure 13. RSA CIPP model.

Act. Cycle 1 activities were undertaken by the AR team between May and August 2016. Preliminary actions focused on an information session hosted by the RSA in July 2016. An early planning step for this session included the development of an institutional survey, the content of which focused on potential benefits and drawbacks associated with the collection, reporting, and publication of outcome data. The survey was sent to representatives of the unaccredited institutions in May 2016. An email invitation to the information session was sent to representatives of the unaccredited institutions in May 2016. The survey response data were used to draft RSA forms and policies to be presented at the session. The information session took place as planned.

The product-focused interventions were those addressed in the information session, including the implementation of a new student disclosure form, mandatory for all new students beginning on August 1, 2016, and the collection of outcome data. Product data for August 2016-July 2017 would be required for submission to the RSA on September 1, 2017. Of the 123 institutions invited, approximately 35 attended the session, which took place at the RSA office building. The conference room was filled to capacity, with five RSA staff and multiple institutions bringing more than one representative. A PowerPoint guided the presentation, with time provided at the end to field all questions. There was one institutional representative who angrily interrupted the presentation and attempted to discredit the RSA's efforts by proposing that unaccredited institutions were being unfairly targeted; he also mistakenly argued that the RSA disclosure form and reporting requirements were more comprehensive than those governing accredited institutions. Fortunately for the RSA, his beliefs had been made known to the agency prior to the information session through emails from individual institutional representatives. This allowed the PowerPoint to be modified to include state legal-code justification for RSA actions

as well as an overview of accreditation processes. Website resources for public databases providing extensive outcome data required of accredited institutions for maintaining access to federal funds were also included in the presentation. These included the USDOE College Scorecard and the College Navigator, administered by the National Center for Education Statistics.

Observe and evaluate. "*You get clues, but you got to live through the process first*." This comment was made by an AR team member in her exit interview, and it exemplifies the value of experience in understanding. The notion of public experimentation—the type that can be observed by external stakeholders (i.e., regulated unaccredited institutions)—was uncomfortable for the RSA, given its perception as an objective regulating body. Yet, the RSA's experimentation with shifting from a role of rule enforcer to rule maker was achieved during the first cycle of this study. Experimentation and, later, analysis, were crucial to evaluating the project completed by the AR team. In addition to observation, in this cycle institutional feedback was key to the development of improved methods for use in the evaluation of unaccredited institutions. This feedback was collected during the information session and during a follow-up period offered for comments and suggestions. Modifications to both the student disclosure form and RSA outcome data form were agreed upon by the AR team following review of the feedback data. This action not only improved the content of the documents but also improved the relationship between the institutions and the RSA.

Regarding accountability, this relationship between the agency and the institutions was strengthened because institutions had a concrete experience whereby they influenced their own oversight. In this cycle—the product dimension—representatives of unaccredited institutions asked the RSA to adjust in order to better support them. As a result, the RSA made

modifications, suggesting that the RSA was willing to be informed by institutional comment and to apply that feedback to regulatory policies and procedures. In addition to involvement, the institutions, according to the RSA staff present at the information session, also appreciated the opportunity to simply provide comment. This gratitude was confirmed by an email from an institutional representative following the meeting:

> *I wanted to take a minute to thank you for putting on a great meeting Wednesday. Coming in to the meeting, I was unsure what to expect as I knew there were a few people from other schools not pleased with the new procedures to be implemented. I think the changes are great, and I wanted to thank you all for taking the time to walk us through the need for the changes and expertly answering some of the harder questions asked by some of us.*

The executive director was pleased with the meeting and congratulated the AR team on its success. The presence of the disclosure form is now included during the annual RSA review of the institutional facility. Inaugural outcome data reports were collected by the RSA on September 1, 2017. Because many schools failed to submit on time, RSA staff email reminder throughout September 2017, encouraging schools to submit the data report. A final reminder was sent October 13, 2017. This notification indicated authorizations would not be renewed without receipt of the report. As of that date reports were received by 80% of the unaccredited institutions. The RSA plans to assess the data in early 2018. Findings will be generated in order to provide information to the RSA Commission, relative to the audit response, and to modify the procedure for the next outcome data report submission, due September 1, 2018.

Process Evaluation Dimension (Cycle 2)

The most public component of the institution is instruction. This is the process which allows the institution to exhibit its ability to offer postsecondary education. Instruction enables the intellectual development of students through a delivery of inputs, such as policies, procedures, and curriculum. Not only do processes connect inputs with products, but they also provide the stability necessary to support the system as a whole. Without a healthy instructional and operational process, the institution is likely unable to utilize its resources toward meeting educational goals.

Revise and plan. The second dimension of AR project aimed to identify relevant process features that potentially affect the institution's RSA evaluation. Iterative planning was based on the experiences of the first cycle and initiated with AR team discussion centered on defining the process evaluation, its relationship to the CIPP model, data collection, and potential interventions. Data determined to be valuable to the second cycle of this project were sourced from internal RSA documents, AR team materials, and institutional feedback collected though a survey.

Early conversations aimed at implementing process evaluations focused on potential action through classroom observation and/or student surveys. While it was agreed these were worth consideration and experimentation, the AR team had concerns regarding their implementation, such as the ability to implementing evaluations within normal RSA office hours. Many institutions operate at night and during the weekend, thus making it impossible for the RSA to conduct observations. In response to these concerns, I conferred with my major advisor, who suggested that I inquire of the AR team whether it would consider a shift from an RSA position as a regulator to that of a supporter. Fortunately, this was reinforced by an RSA standard

related specifically to institutional effectiveness which requires that an institution be able to show an ability to self-evaluate. This is intended to ensure the institution has a plan to assess whether or not it is achieving its mission and/or goals. While the RSA had not been reviewing institutional self-evaluation practices, the AR team determined that this review would be incorporated into the annual site-visit reviews. This intervention served the institutions in that they could now make sure there was access to this plan and also provided a path for the RSA to ensure compliance.

Following the proposal for the RSA to take up the support role, the AR team agreed and began to develop written resources to assist institutions in completing their own process evaluations. As indicated by one member, "*We've got it informally*," as the RSA had generally operated in accordance with an unofficial norm to help institutional representative when it was sought. This practice made it possible for certain procedures to be formalized quite easily. Another position taken by the AR team was that the publication of information on the front end (i.e. Via the RSA website or available within the application itself) would be more effective and efficient than providing it as feedback within the application review process, as was previously done. Furthermore, the clear presentation of information was noted to be valuable in terms of creating clear parameters for RSA oversight. Explicit information, specifically regarding implications of federal and/or accreditor monitoring, would also improve the support provided by RSA School Assessment Managers to institutions in that a reference point would be available to validate certain determinations. One AR team member commented, "*I'd just rather not get involved*" (in situations where the RSA has no responsibility or oversight). By considering options for clarifying the RSA role in oversight of unaccredited institutions, the AR team

believed that the development and publication of institutional resources would make both the work of the institutions and the RSA staff more streamlined.

Act. The AR team undertook activities between August and December 2016. During the planning phase, a student survey template was created for RSA use, and after the shift it was agreed that this would be the first of multiple resources to be made public. Additional resources intended to support institutional effectiveness were also created, including site-visit and catalog guidelines, as well as a transcript template.

To ensure that these resources were of interest to the unaccredited institutions, a survey was sent to institutional representatives in November 2016. The survey was administered using the Survey Monkey software platform; its content centered on institutional effectiveness, defined as the presence of short- and long-range evaluations of programs offered by the institution. Questions around how the RSA could better support institutions were also included. In alignment with the effort to increase access to information for the institutions, the AR team also determined that the RSA website should be reorganized. The intent of this recommendation was to better accommodate and present the new institutional resource documents. This was achieved through the reorganization of the RSA website, and its subsections, along with the creation new categories such as an "Institutional Effectiveness Resources" area.

Observe and evaluate. Only 5% of the unaccredited institutional representatives responded to the Cycle 2 survey. This low response rate was believed to be a result of poor timing. The survey was provided to institutional representatives the week before Thanksgiving. The data generated from the few instances of feedback ranged from positive to neutral relative to the value of RSA-generated documents about institutional effectiveness. The AR team decided that it would not resend the survey but would instead roll out resources and then collect feedback

once institutions had time to experiment with those resources. In collaboration with RSA staff, the AR team developed the following institutional resources:

- application-specific FAQ documents;
- an outcome data template;
- a student survey template;
- a transcript template;
- catalog guidelines;
- an enrollment agreement template;
- site-visit guidelines; and,
- financial improvement plan guidelines.

All were made available to institutions on the RSA website.

While the review and evaluation step of Cycle 1 noted areas related to interventions, the AR team's reflections were more removed in Cycle 2. The team's assessment of the institution's ability to self-evaluate centered on the RSA's own internal evaluation practices. The team found that while the RSA was encouraging institutions to utilize short- and long-term evaluations in the aim of supporting progress and success, it could not easily identify similar RSA practices. As a result, it was determined that Cycle 3, context evaluation, should include interventions that could impact and improve RSA practices for ongoing self-review, evaluation, and critique.

Context Evaluation Dimension (Cycle 3)

The environment surrounding a system provides critical context for evaluating that system. Relative to this study, contextual factors included not only students, job markets, and licensing requirements, but also a RSA awareness of potential impacts from external powers. Factors such as these, which are outside of the organization's control, can impact growth, work, and success; therefore, understanding their dangers and benefits helps significantly to inform the preparation, protection, and recovery required of the system. Thus, the third cycle of this AR study, the context dimension, aimed to identify relevant contextual features that may have potentially impacted the institution's RSA evaluation.

Revise and plan. The third iteration of the change initiative addressed the context quadrant of the CIPP model. Originally, the AR team's planning focused on defining context and identifying its connection with inputs, products, and processes. During one AR team Meeting, a member with institutional experience in both for-profit and public higher education provided a particularly clear example of how context may affect products:

> *Does attendance relate to withdrawal rate? Yes. But people who rely on public transportation probably have more problems with attendance. We would have a higher withdrawal rate. The more people you have coming on public transportation, the higher withdrawal rate you could expect. That's an institutional specific kind of benchmark. If you're going to have that kind of thing, if you're going to locate yourself in Barnesville, you're going to have a higher withdrawal rate.*

This illumination of how students, as institutional inputs, affect both process (enrollment) and outcomes (withdrawal rates) demonstrated why it is valuable to consider context in an examination of institutional planning and self-assessment. Regarding programming and mission,

the type of course, length of course, and time slots offered are also influenced by the types of students who make up the institutional context. As one AR team Member noted, "*It is reasonable that the longer that a student is in a program, the greater the opportunity or chance that they're going to withdraw."* Comments such as this sensitized the AR team to the open nature of the system and the ease with which it can be influenced by the environment. This improved awareness helped to frame the intention of the AR team, in this cycle, to utilize interventions to collect information that would empower the RSA to develop context-related support and, by extension, encourage quality improvements at both the institutional and agency levels. This intention was based on the team members' collective belief that the new knowledge would positively inform RSA decisions impacted by environmental (i.e., contextual) factors.

The planning for this cycle began early in the study during the development of a proposal of interventions possible for each quadrant of the CIPP model. This activity helped to enhance the AR team's understanding of how the CIPP model could be utilized throughout the study. Specific to the context quadrant of the model, the Team originally suggested annual program reports for the RSA as well as potential job and licensing reports to be made available to institutions via the RSA website. Five months later, within the context dimension of the project, the Team had expanded its focus to include internal RSA practices. In order to serve RSA planning, the AR team suggested that annual surveys be provided to both the institutions and the RSA staff. These surveys were argued by the AR team to benefit the potential RSA reports (as suggested previously) since they captured data concerning institutional and RSA staff interests relevant to report development. Furthermore, I theorized that the information would give RSA leadership the opportunity to complete a comprehensive annual needs assessment, encompassing the agency and its regulated institutions.

In Cycle 3, the AR team sought to expand its examination of the other CIPP quadrants (i.e., input, process, and products) to include the influence of context. For example, as one AR team member noted, "*I was thinking the same thing about considering the environment of the institution, the job market, if we're looking at PCTs [Patient Care Technicians], and all of a sudden, there's no PCT jobs out there—should that be considered in our evaluation?*" In other words, what happens if the institution is effectively training its students but there are no jobs? Is it the state's responsibility to step in and prevent the institution from accepting money? The AR team decided to utilize institutional plans and missions to improve its initial discussion with each institution. This "interview" was already required as the first step in the RSA approval process; the intervention would simply expand this conversation to not only cover application processes and expectations but also to include the submission of a needs assessment by the institution. This would be similar to a business plan and would help the RSA to determine whether or not the institution was prepared to operate as a postsecondary institution in the state, thereby informing the depth of review required by RSA staff. A plan for requiring the institution to conduct a needs assessment prior to obtaining access to the application was developed by the AR team, applauded by the RSA staff, and approved by RSA leadership. The final steps for the institutional proposal included the following:

1. Institutional profile: Basic information must be provided, including name, address/proposed address, mission statement, and names of institutional representatives and personnel.
2. Programs: All proposed programs must be listed, including program name, level, and objective.

3. Needs assessment: Using state Department of Labor (DOL) data, the institution must submit a narrative justifying the need for the proposed training within the state. Should DOL data not be applicable, a statement relative to educational needs associated with the proposed program offering(s) may be presented.

While the process was not enacted officially during the project timeframe, it was eventually implemented in June 2017. The RSA is considering creating a similar procedure for new program applications. In a continued effort to increase information for applicants and regulated institutions alike, and to set expectations upon initial contact with the institution, an instructional PowerPoint was also developed by the AR team. Its aim was to assist applicants with the RSA approval process. The availability of this resource has been delayed due to contracting with a new third party to develop and support the RSA website. I expect it, along with additional informational PowerPoint presentations focused on RSA oversight, to be included in the revamped website expected to go live winter 2018.

Act. The AR team undertook Cycle 3 activities between November 2016 and February 2017. The first intervention within this dimension was designed to address the impact of the institution on its market, specifically the student population and the labor field connected to training offered by the institution. Information access was achieved by connecting the RSA resources with other appropriate state resources. Specifically, on the RSA website, the AR team added links to the DOL and its database tools for searching for specific jobs, their projected growth, and the need in each area of the state. These exemplary tools were also demonstrated for RSA staff in an effort to educate and to encourage sharing of this information with their assigned institutions. Future plans included the development of a quarterly or biannual newsletter to inform institutions about new information and/or resources made available on the RSA website.

Like the institutional proposal, this too was enacted after the completion of the study in March 2017. The first newsletter was sent in June 2017 with a second sent in October 2017.

Another intervention achieved in the context dimension of the study was one that may be viewed as minor but may seriously influence RSA feedback and decision making. This action comprised the highlighting of the institutional mission statement in the application review completed by an RSA staff person. Prior to the inception of the study, the RSA had limited its review primarily to ensuring a connection between standards and legal codes within the application documentation. By incorporating the mission statement in the assessment of the RSA approval process, the AR team aimed to create a new RSA lens through which to understand, critique, and encourage improvement of the application and site-visit evaluations.

While the explicit inclusion of the mission statement had been previously addressed in the process dimension (by requiring it annually as part of the institutional catalog), this cycle sought to further prioritize the institution's stated values and objectives. The AR team determined that this intervention would be explored as part of the qualitative review completed during the RSA evaluation process. Experimentation with shifting the RSA perspective to be more environmental in nature was achieved initially through RSA office meeting discussion. These conversations focused on the value of fostering an awareness of mission in evaluation. The RSA staff agreed that this minor modification could, in fact, be influential. As a result, they decided to incorporate it into their assessment strategy, used to provide guidance to institutions. These types of discussions with institutions vary but may include programmatic additions/removals, facility management, financial viability assessments, and student complaints.

Action in this cycle of the study also included surveys, which were provided to both institutional representatives and RSA staff. The institutional survey was developed by the AR

team based on input from the RSA staff as well as example surveys from state counterparts and/or institutions. Furthermore, the research literature and advice from my major advisor provided guidance around survey best practices. In the survey's final version, the content was related to evaluation policies and procedures, customer support, and opportunities for improvement. Survey Monkey was again utilized to administer the surveys. This platform ensured that institutional responses remained secure and that the AR team could easily monitor the number and frequency of responses (for instance).

Observe and evaluate. During the review phase of the process dimension, the AR team was very interested in the institutional survey responses. Survey data were retrieved from Survey Monkey and presented to the AR team in a compilation document. Twenty-one of the 116 institutional contacts responded to the survey. While some answers were unclear (e.g., "nothing" and "accredidation" [sic] in reference to areas on the RSA website that were helpful), others were useful for AR team review. The survey responses suggested that there is some confusion among institutions regarding the difference between the RSA website and the application portal, a separate but connected database. Also, representatives sought more information. Suggestions included a live-chat feature and more regular updates about changes in policies and procedures. Another area of insight reveals by the survey responses was the range of opinions held by the representatives. For instance, Figure 14 shows survey responses concerning RSA staff support. While respondents supplied more positive comments and answers overall, there was a wide range of responses regarding satisfaction, indicating that the RSA has ample opportunity to grow and develop.

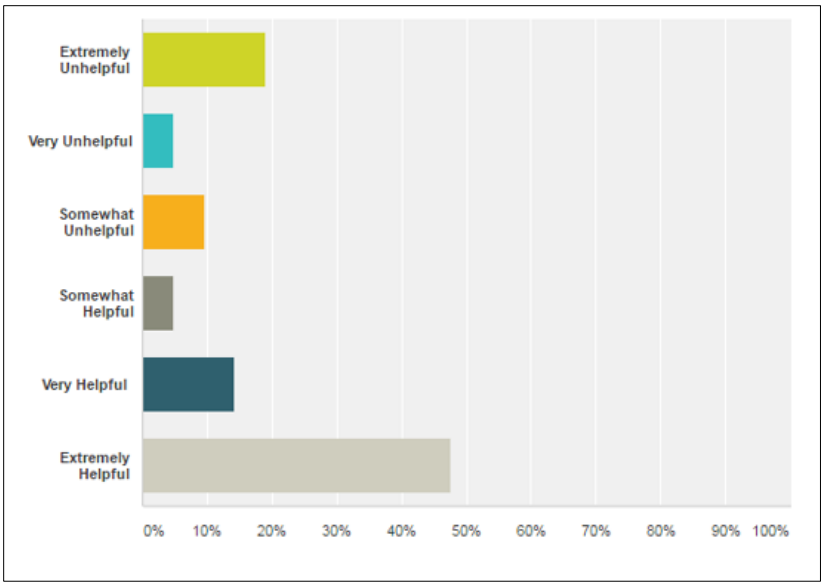

Figure 14. How Helpful Do You Find RSA Staff? Survey Question Responses.

In addition to institutional survey responses, I collected and compiled RSA staff survey responses. These were then shared with RSA leadership but, due to privacy concerns, not with the AR team. Leadership use and/or decisions related to the staff survey were not shared with me, but the surveys were deemed by the AR team and the RSA leadership to be beneficial for incorporating stakeholder perspectives in planning and decision making. During a February 2017 office meeting, the RSA staff conveyed that they were pleased with the content of both surveys. New RSA procedures now include the administration of these surveys to both institutional representatives and RSA staff on an annual basis as part of an agency effectiveness review.

Implementation Chart

Table 8 offers a guideline of AR team actions in each phase of the project. Experimentation was guided by the following action research steps: planning, acting, observing, and evaluating.

Table 8

RSA Action Research Implementation Chart

Timeline	Connection to Framework	AR Team Activities	AR Discussion	Data Collected
DIMENSION #1: Product Analysis/Audit Response				
April 2016 –August 2016	1. The CIPP model is used to guide the planning, collection, observation, and review of the data and the intervention. 2. Specific attention is paid to impact of product on institutional quality. 3. There is focused intent around improving evaluation in order to improve accountability relationships (e.g., student-school; school-RSA; public-RSA).	A. Evaluate existing processes B. Propose interventions C. Determine data collection needs D. Review data E. Propose interventions F. Determine additional data collection needs G. Review data H. Implement • RSA information session for institutions • Outcome data report (August 1, 2016 - July 31, 2017) ○ Due September 1, 2017 • Disclosure form mandatory beginning August 1, 2016	➢ What needs improving? ➢ What can be investigated and experimented with during this research project? ➢ How does the current evaluation fit into the CIPP model? What pieces are currently missing? ➢ How can the RSA review product evaluation? ➢ What are potential interventions? ➢ How can the RSA improve its relationship with the unaccredited institutions?	○ Internal documents ○ Institutional survey responses ○ RSA counterpart open-ended questionnaire responses ○ RSA staff feedback on interventions (student disclosure form, outcome data collection plans) • Collected in emails • Collected in researcher journal ○ AR team meeting supplemental documentation (consolidated information handouts)

Timeline	Connection to Framework	AR Team Activities	AR Discussion	Data Collected
		DIMENSION # 2: Process Analysis		
August 2016 - December 2016	1. Process implementations are being explored individually and in relation to CIPP model. 2. Specific attention is being paid to impact of process on institutional quality. 3. Accountability framework is being used to guide the review and collection of data as well as the intervention.	A. Evaluate existing processes B. Discuss relationships to previous intervention C. Propose interventions D. Determine data collection needs E. Collect data F. Review data collected G. Implement • Increased oversight of institutional effectiveness (IE) • Publication of institutional resources • Reorganization of website • Modification of site visit guidelines to include IE review • Inclusion of RSA IE for future plans	➢ How can the RSA review process evaluation? ➢ What are potential interventions? ➢ How can we support schools in evaluating themselves, with the aim of quality improvement? ➢ How is the first intervention affected by the potential second intervention? ➢ How can the improved accountability relationship be sustained?	○ Institutional surveys on process interventions ○ RSA staff feedback on interventions • Collected in emails • Collected in researcher journal ○ AR team meeting supplemental documentation (consolidated information handouts) • Counterpart IE collection/ evaluation practices (internal [RSA] and external [institutional])
		DIMENSION #3: Context Analysis		
November 2016 - February 2017	1. Context implementations explored individually and in relation to CIPP model (context for institution	A. Evaluate current processes B. Discuss relationships to previous intervention C. Propose interventions D. Determine data	➢ How can the RSA review context evaluation? ➢ What are potential interventions?	○ Institutional surveys ○ RSA staff surveys ○ AR team meeting supplemental

Timeline	Connection to Framework	AR Team Activities	AR Discussion	Data Collected
	includes RSA oversight and expectations) 2. Accountability framework used to guide the review and collection of data as well as the intervention	collection needs E. Collect data F. Review data collected G. Implement • Highlighted mission statement in application review • Publication of contextual information (job market, institutional competition) • Enforced new proposal review process • Introduced annual RSA review of evaluation policies and procedures o Institutional survey o RSA staff survey	➢ How are the first and second interventions affected by the potential third intervention?	documentation (consolidated information handouts)

Timeline

The AR team completed the project over the course of one year, from March 2016 to February 2017. Table 9 provides the date and focus of each meeting. Individual Team members maintained participation into either April or May 2017 in order to complete an exit interview.

Table 9

AR Team Meeting Plan

AR Meeting Date	**Action**
March 26, 2016	AR review and problem framing
April 2, 2016	Literature review presentation
May 23, 2016	Cycle #1 action planning re: audit feedback
June 20, 2016	Present an update on Cycle #1 (planning/ implementation)
August 1, 2016	Cycle #1 review/action planning for Cycle #2
September 12, 2016	Present an update on Cycle #2 (planning)
October 17, 2016	Present an update on Cycle #2 (planning)
November 28, 2016	Cycle #2 implementation review/action planning for Cycle #3
January 5, 2017	Present an update on Cycle #3 (planning)
February 6, 2017	Present an update on Cycle #3 (implementation review/action planning for new processes)
February 27, 2017	Present an update on overall AR team final implementation
April - May 2017 (various dates)	AR team exit interviews

Conclusion

This case study explored how an action research team engaged with action research and the CIPP model to investigate a problem and experiment with interventions to encourage positive change. Completed over the course of 12 months, the intention of this project was to enhance the

process of evaluating unaccredited institutions. This work was completed through an inaction of technical and theoretical changes a regulatory state agency Examples of new techniques implemented in this case study included additional reporting requirements, modified RSA record keeping processes, increased efforts to collect institutional input, and formalized assessment of effectiveness of both the unaccredited institutions and the RSA. Theoretical changes included shifts in the RSA perception of unaccredited institutions, of institutional evaluation, and of the agency itself. Details regarding the RSA cultural shifts that occurred as a result of the case study will be presented as findings in Chapter 5.

CHAPTER 5

FINDINGS

This chapter presents findings relative to the study's purpose and research questions. The purpose of this action research case study was to utilize Stufflebeam's (1971) context input process and product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The following research questions guided the study:

1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches to the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts within a regulatory state agency system are necessary to accommodate the implementation of new evaluation processes?

The setting for this study was a regulatory state agency, referred to as RSA for purposes of anonymity. Responsible for the oversight of private postsecondary institutions operating in the state, the RSA focuses primarily on consumer protections. Table 10 summarizes the findings.

Table 10

Research Findings

Research Question	Findings from Data
1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches to the evaluation of unaccredited postsecondary institutions?	• There was confusion concerning basic regulatory terminology. • There was discomfort with the label "unaccredited" • There was value placed on a stratified review.
2. What cultural shifts in the regulatory state agency system are necessary to accommodate the implementation of new evaluation processes?	• The perception of unaccredited institutions changed. • The perception of evaluation changed. • The perception of the RSA's role changed. • The project stimulated mirrored quality improvement.

Findings Associated with Research Question 1

Efforts to improve evaluation are tied inherently to the concept of accountability, defined by Stufflebeam (1971) as "the ability to account for past actions in terms of the decisions which precipitated the actions, the wisdom of those decisions, the extent to which they were adequately and efficiently implemented, and the value of their effects" (p.13). Given that evaluation is an intentional effort to gain insight into the activities of a system, one of its intents is to obtain, sustain, or maintain accountability. This accountability could serve multiple parties, including the self, individuals, or groups. A key objective of this research study was to understand the value of accountability approaches in the regulatory state agency setting and their effect on both the unaccredited institutions and the RSA. Table 11 lists key findings that arose in response to research question 1; each of these findings is described in detail in the next section.

Table 11

Research Question 1 Findings

Research Question	Findings from Data
1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?	• There is confusion concerning basic regulatory terminology • There is discomfort with the label "Unaccredited" • There is value in a stratified review.

Confusion Concerning Terminology

The Higher Education Act of 1965 (and its amendments) grants states the authority to authorize postsecondary educational institutions and to set rules for guiding the operation of authorized institutions. Accreditation, though also legislated by the Higher Education Act, is a wholly different process, pertaining to approval by an accreditation body recognized by the U.S. Department of Education (USDOE). While authorization and accreditation represent formal approvals granted by regulatory entities, they vary greatly in terms of application processes and permissions allowed by each status. While the terms are distinct within the higher education regulatory field, this study found that the confusion among both institutional representatives and diverse consumers alike concerning accreditation was deeper and more widespread than expected.

Prior to the AR project, I (as the researcher) was aware that, generally, representatives of unaccredited institutions lacked a clear understanding of the differences between accreditation and authorization. I observed this regularly in the daily operations of the RSA. For example, the front-end office staff consistently fielded inquiries made to the RSA regarding the authorization process that often included references to "accreditation" instead of "authorization." The RSA school assessment managers also encountered this type of discrepancy, such as the following

email excerpt I received: “Personal problems delayed me from completing the application process for the accreditation.” I had accepted this confusion as a minor yet consistent issue since it seems reasonable for individuals inexperienced with oversight to be ignorant of the distinction. What was novel about this finding was what happened after the RSA recognized the potential impact of this misunderstanding and attempted to educate stakeholders about the nuances embedded in the terms.

At the outset of the study, it was unclear what type of support unaccredited institutions would need during the AR team’s efforts to enhance RSA evaluation. Yet, by stratifying the RSA-authorized institution groups into two subgroups—accredited and unaccredited—I quickly identified a surprising characteristic. Representatives of unaccredited institutions were confused about the distinction between accreditation and authorization, which disrupted the research project. A key illustration of this confusion and resulting disruption presented itself during the first cycle of the action research study. An institutional representative wrote an angry email to the RSA in response to new requirements initiated by the AR team. These requirements included submitting annual outcome data to the RSA and providing an RSA disclosure form to students upon admission. This particular representative’s frustration arose from his belief that the RSA was unfairly demanding more of the unaccredited institutions than was required of local accredited institutions. This lack of understanding, of the terms and how they are applied, was evident in the email message he sent to me in July 2016:

> *Your schools that are “accredited,” such as ... [Institution A] and [Institution B] ... make their dental assisting programs deliberately one year in length to gain your “accreditation” AND more importantly, qualify for federal funds.*

The institutions he referenced in his message were accredited at the time, and his use of "your accreditation" indicates an ignorance of the purpose of state authorization. RSA approval does not make institutions eligible for federal student financial aid but, rather, may make it permissible for an institution to apply for accreditation. If accredited, the institution may then apply for access to federal student aid funds, should it so choose. While federal funds are available to unaccredited institutions through state-administered grants, such as those tied to the Workforce Innovation and Opportunity Act (WIOA), these funds are not part of the federal student aid program.

Another communication from a different representative of an unaccredited institution also showed a lack of understanding of accreditation reporting norms. The following is an excerpt from an email sent in response to the interventions associated with the first cycle of the AR project:

> *I think that the new mandatory updates are not fair for non-accredited schools. I have never ever seen any universities that showed ... placement, passage rates and fail rates to new students upfront to sign.... I love my school, I work very hard to help my students get all the materials to pass the State Tests also, I help place all of my students, so I am not worried about my placement rate, I am at 98% for that. My passage rates are good to [sic], however to show a student that letter just degrades my school that I work so hard at being the best it can be. I nominate to not allow this to go thru.*

Accredited for-profit institutions are required to provide student disclosure forms, which generally serve as a transparency measure rather than an effort to discredit or challenge an institution. As an evaluation and planning tool, the early identification of this misunderstanding

about regulatory oversight within U.S. higher education assisted the AR team in proposing what steps would be necessary to enhance the evaluation of unaccredited institutions.

It is important to acknowledge, however, that not all schools in this study conveyed ignorance of regulatory terminology or processes. Following the disruptive discontented emails from institutional representative and their outspokenness at the July 2016 institutional information session, multiple institutions contacted RSA staff to offer support. One unaccredited institutional representative emailed the RSA: "Perhaps he is unaware that the accredited schools who are also authorized by RSA must report completion and placement data to their accrediting bodies." Another representative called me after the information session and shared that

> *we've already had issues with a local vendor and as a result have a student disclosure form already in place to address accreditation. Also, accreditation is our goal…. We do not agree with the crazy emails that have been sent to us.*

While these examples suggest that some institutional representatives were indeed informed, it is possible that their communications were influenced by a desire to maintain a positive relationship with the RSA.

Also, significantly, this finding revealed that the misuse of *accreditation* was not limited to representatives of unaccredited institutions. Consumers, including RSA service providers, lawmakers, and students, used the terms *accreditation* and *authorization* interchangeably, or simply used *accreditation* to indicate formal approval. During a January 2017 state congressional budget hearing, I observed a clear example of consumer confusion when a lawmaker proclaimed publicly that the unaccredited diploma mills that advertise on late-night television needed to be controlled. His call conveyed a dramatic misunderstanding of the unaccredited institutions regulated by the RSA. Diploma mills are institutions that provide degrees and/or certificates

without any instruction or course requirements but at a cost; their entire purpose is to generate profits by misleading the public to believe the issued credentials were earned and thus legitimate. Unaccredited institutions, on the other hand, are not diploma mills by nature. There is no connection between the two labels other than the fact that accredited institutions have regular oversight from accrediting and authorizing entities, while diploma mills are much more likely to avoid regulation and thus not apply for accreditation. Another example involved a service provider—IT developers working with RSA to implement record-keeping and application software—who confused accreditation with authorization in creating a database of accreditors. Because state authorizing regulatory agencies were listed in the database along with accrediting bodies, multiple unaccredited institutions submitted authorization forms indicating they were accredited by the RSA. An unfortunate potential byproduct of the IT mix-up of terms was that it may have encouraged further misunderstanding at the institution level.

While not universal, the persistence of this type of confusion was present throughout the 12-month AR case study. At the beginning of the study in May 2016, affected institutional representatives were notified by email that this project would focus on unaccredited institutions. This was communicated again in person during a July 2016 information session and as part of the project's first round of interventions. Furthermore, this distinction was communicated publicly via the RSA website , which by then included a section titled "Additional Requirements for Unaccredited Institutions," where a new student-disclosure form was available that stated explicitly the difference between accreditation and authorization. Yet, the misuse of terms persisted. For example, in a survey sent to unaccredited institutional representatives in January 2017, eight months after the unaccredited institutions were first notified of the project, one person answered "*easier way to renew accredidation* [sic]" in response to a request for

suggestions for additional information that could be added to the RSA website. This survey comment indicated that more work was still needed to reduce or eliminate the confusion of terms. One AR team member reflected on this need in his exit interview:

> *People don't really even understand the difference between accreditation, accredited and unaccredited institutions, so start there and then work up from there. I think it really let us know that we needed to start at the bottom and develop. We had a lot of resources and procedures that we needed to develop.*

Evidence of the continued misunderstanding also presented itself in June 2017, after the culmination of the project but still during the study, when an Internet search of the name of the RSA and the word *accreditation*. Multiple Google search results indicated an association between the two. In one example, an authorized unaccredited RSA institution's website presented its RSA approval information within a tab labeled "Accreditation"; however, no actual accreditation information was presented. Another unaccredited RSA-authorized institution advertised itself as accredited in its website's "Frequently Asked Questions" in response to the question, "I am looking for an accredited school. Why isn't this school accredited?" Both institutions were not accredited at that time. Indeed, such confusion of terms matters, especially in the field of higher education regulation, where there are many types of postsecondary institutions and many key distinctions among the various levels of oversight approval. Relative to terminology, this study found that recognizing this confusion allowed the RSA to remain more informed as it sought to enhance its evaluations and associated agency processes and policies.

Discomfort with the Label "Unaccredited"

Study also found that representatives of unaccredited institutions were uncomfortable with the label "unaccredited." This was surprising given the previous finding around the apparent

difficulty understanding the difference between authorization and accreditation and thus grasping the implications of the label. Yet, in a July 2017 RSA information session, representatives of unaccredited institutions openly expressed discomfort with this categorization, as conveyed through their questions during and responses to my researcher's presentation. Particularly troubling to the representatives was the RSA student-disclosure form, which was required to be given to any new student enrolling at an unaccredited institution authorized by the RSA. This document included sections that the student was required to initial to confirm his or her understanding of the information presented. RSA School Assessment Managers would also confirm its presence in the student file during annual institutional site reviews.

One of the items in the disclosure form noted specifically that the institution was unaccredited. Other passages in the disclosure materials informed the student that credits earned from unaccredited institutions are less likely to be transferrable to another institution; that credentials earned may not be recognized by future employers; and that federal student aid would be inaccessible to cover the cost of the programming. While potentially intimidating to institutions and consumers alike, the disclosure information represented facts. Unfortunately, some representatives balked at their inclusion. An email sent by one unaccredited institutional representative conveyed alarm:

> *As you know, our only concern with the new mandates is regarding the Accreditation Status statement on the Student Disclosure Form. As discussed, we believe that, as currently written, this statement would have an adverse effect on our ability to continue to attract top students by creating an unnecessarily negative view of our institution as it compares to other educational options.*

Another unaccredited institutional representative expressed a similar argument in an email about the new disclosure requirement: "*We have absolutely nothing to hide, but this document seems to unnecessarily highlight many potential negatives including our Academy's status as a new and still-growing institution—not at all welcome*." Still another representative wrote:

> *It pretty much is belittling our school saying that we are good enough to get State Approval but yet not good enough to operate without a paper stating that we are approved but in no way accredited. I think this is unfair and makes [our] smaller school look bad.*

The RSA mediated this distress, in part, through a compromise: The agency modified the disclosure form's language to indicate that, while the institution was authorized by the state, it "is not accredited by a U.S.-based accrediting association recognized by the United States Secretary of Education." The explicit acknowledgement that the institution had obtained state approval appeared to soften the negative reaction to being identified as unaccredited since no further discontent was shared with the AR team after the comprise language was added to the disclosure information.

Value of Stratified Review

The multitude of ways in which postsecondary institutions can be categorized by the accredited-unaccredited divide empowered the RSA to improve its evaluations of unaccredited institutions, a group often overlooked and under-evaluated. In her exit interview, one AR team member implied that even the RSA had not provided an individualized review of this group of institutions. She noted that prior to the project, "*[unaccredited institutions] were just bunched in with the rest, and 'with the rest,' I mean accredited institutions."* This study's examination of a

unique sample group allowed for a focused assessment, encouraging modifications centered specifically on improving the evaluation of unaccredited institutions.

Early in the study, the AR team identified educating representatives of unaccredited institutions in particular as a critical step toward encouraging positive change at the RSA. As one team member expressed, "*the thing about the unaccredited schools, in my opinion, they're just undereducated. They're not bad actors."* The project enabled the AR team to consider how lack of accreditation affected RSA evaluation. The coded AR team meeting transcripts highlighted the team's belief that differences between accredited and unaccredited institutions greatly affect how an institution operates. Regarding regulation, for instance, accredited institutions require governance by multiple entities, while unaccredited institutions are typically only responsible for meeting guidelines set forth by the regulatory state agency. This impacts not only the value of the RSA oversight but also the ability of the institution to comply with RSA requirements. One AR team member referred to these entities as "layers" in speaking about the need for additional RSA attention:

> *I think realizing that accredited intuitions have a lot more oversight—because they're not just looking to us, they're looking to accreditors and they're looking to the Department of Ed. because they deal with financial aid. They have a lot more layers, whereas our unaccredited institutions don't, though they should, even if it's a certificate-granting program that maybe is inexpensive and short in duration. Still, it needs to be taken seriously, and it needs to be evaluated to the best of our ability.*

The team also identified the positionality of the RSA within the hierarchy of higher education oversight as important. Regarding the agency's influence on unaccredited institutions, during an AR team meeting I recognized that the RSA is "*their baby step to get to accreditation, but the*

unaccredited schools, they're only getting that baby step." As the first, and sometimes only, overseeing body, the RSA and its requirements are all that are known by unaccredited institutions, which limits their understanding of higher education norms. This lack of awareness came as a surprise to one AR team member who, in response to the resistance of some institutions present at the July 2016 information session to the expansive reporting requirements of accredited institutions, said, "*That astounds me*." The unexpected—but telling—responses on both sides of the conversation influenced the research planning around interventions implemented as part of the study.

Depth of oversight is one obvious focus when examining institutions regulated by the RSA, but as a result of the study, another key distinction was identified: the connection between accreditation status and the resources available to an institution. Relative to RSA oversight, the human resources necessary to collect, report, and respond to requests for information were found to be especially impactful. Unaccredited institutions tend to need more RSA staff support because they often have fewer resources than accredited institutions. In one AR team meeting, conversation focused on the impact of resources, both human and financial, and one member noted this divide:

> *Well, I mean, a lot of it's resources…. Obviously the accredited institutions have been around, they have money, they have resources, but the unaccredited institutions don't. I mean, they may have people with knowledge in the content area, but as far as running … a business, basic concepts [like] that. So I mean, obviously you have a lot of resources when, you know, [you're] a larger institution.*

Weaknesses in the area of human resources may also limit the ability of the RSA to complete an efficient and accurate evaluation of an unaccredited institution. Specifically,

appropriate institutional representative experience and knowledge affects the institution's ability to comply completely with RSA policies. This inexperience factor was identified through RSA survey results. One survey distributed to unaccredited institutions found that of the 42 respondents, 26 representatives (62%) worked at institutions that, at the time, did not report outcome data to any regulatory body. The AR team also noted that inexperience with external assessments also influenced the ease (or lack thereof) with which institutions accommodated changes in RSA evaluation practices. In response to a survey question addressing outcome data, one institution expressed that human resources affected their ability to comply: "*Our company is very small, small revenue with limited support. We do not have the bandwidth that these larger institutions have and should not be held to the same standards as them."* Acknowledging the impacts of inexperience and small support staffs was important as the AR team considered future interventions.

Additionally, recognizing the value of viewing institutions as either accredited or unaccredited encouraged the RSA to consider its evaluation process anew from a novel platform. This new perspective illuminated opportunities for education and training for both institutions and the RSA itself. Furthermore, relative to its research purposes, this study found that a stratified review process, with designations for accredited and unaccredited institutions, allowed for a more customized evaluation and assessment that better fit the needs of unaccredited institutions.

Findings Associated with Research Question 2

Central to the cultural shifts enacted by the RSA study were perceptual changes. Biases and opinions created individual and group "truths," and these greatly influenced decisions and actions made as part of this case study. Specifically, the foremost shifts, which allowed for the

implementation of new evaluation processes, represented changes in the perception of unaccredited institutions, the perception of evaluation, and the perception of the RSA. Surprisingly, the evolved viewpoints also triggered an internal examination of the RSA system, which in term catalyzed efforts to improve its own quality of service. Table 12 summarizes the findings associated with research question 2, each of which is described in the following sections of this chapter.

Table 12

Research Question 2 Findings

Research Question	Findings from Data
2. What cultural shifts are necessary in the regulatory state agency system to accommodate the implementation of new evaluation processes?	• The perception of unaccredited institutions changed. • The perception of evaluation changed. • The perception of the regulatory state agency (RSA) changed. • The project stimulated mirrored quality improvement.

Change in Perception of Unaccredited Institutions

As discussed in relation to the findings associated with research question 1, unaccredited institutions typically have fewer resources than those of accredited institutions. In the case of the RSA, this also applies to the depth of experience that school assessment managers bring to their work with unaccredited institutions. During the study, the majority of these managers, who were responsible for institutional evaluation, had fewer unaccredited than accredited institutions assigned to their workloads. This meant that RSA staff were exposed more regularly to institutions well-versed in regulatory norms, given accredited institutions' responsibility to comply with multiple levels of oversight. My own experiences with unaccredited institutions, as an RSA staff person, proved that oftentimes application review and feedback related to requested

modifications took more time and effort. Strained interactions such as these created certain negative RSA biases toward unaccredited institutions. Fortunately, this was not an immoveable bias: One finding showed that as the study progressed, the RSA's perception of this group of schools changed.

At the beginning of the study, AR team members regularly associated the issue of inexperience with unaccredited institutions. One member commented on this during a team meeting discussion focused on why these institutions do not seek accreditation: "*They're just not ready for that."* Regarding unaccredited institutions' understanding of the value of RSA regulation, another team member argued, "*There's a lot of them, and a lot of times they don't get it, the value of the process, the authorization process*." The perceived naivety of representatives of unaccredited institution also reinforced the belief among RSA staff that this group required more work of the agency. This was expressed in the following excerpt from an AR team meeting transcript:

> *The unaccredited ones, I think you do have to work a little harder. Some of those things they don't understand ... well… they don't even understand in the first place, and then they don't understand the value of it. Then you've got to kind of circle back and explain to them why you have to have all these in place, and why this will help you become successful in the long run, and why this is the best way to serve students.*

Perception was central to this finding because much of the true nature of the unaccredited institution was officially unknown at the outset of the study. A level of ignorance was present at the RSA because of the limited interactions staff had had with representatives of unaccredited institutions. Prior to the study, the RSA typically focused its communication with institutions on feedback regarding items such as application documentation, programmatic evaluations, and/or

site-visit critiques. Expanding the topics of communication between the RSA and the unaccredited institutions was new. As one AR team member commented: "*We've never gone out to the schools and said, just one point, "What would help you with the renewal, with filing the renewal application?" Just open-ended, see what it is.*" This project helped to reveal that the RSA, as a result of historically excluding institutional feedback, had built its perception of unaccredited institutions on incomplete information. Surprisingly, a shift in perception occurred almost instantly once unaccredited institutional representatives were engaged. An AR team member, in his exit interview, noted the immediacy of this shift: "*I think we found out quickly that the more we interacted with the clients, the more they wanted to be interacted with*."

Another aspect of the perceptual shift related to the personalities of the representatives of unaccredited institutions. When the AR team began to initiate interventions, the members were uncertain how institutions would react, which unnerved some them. One AR team member shared in her exit interview:

> *For a while there, I was thinking, "Oh no, these schools are just going to get really annoyed and they're going to be resistant." Although some are—there are very few that are compared to the 120 or whatever that we actually have—most of them are very compliant and they see the value in it.*

She expanded further on the shift in perception of the representatives of unaccredited institutions:

> *It was pleasant to work with these people because they got it based on our preparation, and our feedback to them, and our willingness to talk to them, and our willingness to follow up with communication to them, almost to the point of bending over backwards to accommodate and go one-on-one with them to explain if there was a question what we*

> *were attempting to do, how we were going about doing it, why we were doing it. And that, I think, proved to be pretty successful, particularly for what, in essence, was a pilot set of activities.*

The evolution of the RSA's perspective on unaccredited institutions included a greater recognition of the ability of representatives to learn, improve, and understand the role of the RSA. As one AR team member shared:

> *I do feel like they understand that these changes are being done for the better. They may not want to because it could be a little bit more work for them, but I feel like they see where it's coming from, and they can respect the fact that things need to be changed and improved.*

Increased confidence in the unaccredited institutions assisted the AR team in working more effectively to meet the expressed needs of this group of schools.

Change in Perception of Evaluation

The perception of the intent of RSA evaluation was another area that evolved in order to accommodate modifications of policies and procedures implemented at part of this action research project. While it was predicted in the first AR team meeting that the study would "*help the agency*," the specifics were unknown. One reaction that was unexpected was how, as RSA methods were formalized, their objectives evolved. The finding that emerged was that the RSA shifted its perception of evaluation as a tool for regulation to one that also recognized it as a means for quality improvement.

Prior to the study, the RSA practice of evaluating unaccredited institutions was flexible, with plenty of room for interpretation of RSA policies and procedures. The study charged the AR team with appraising RSA practices and searching for opportunities to enhance the evaluation of

unaccredited institutions. As a result, the team developed and later defined assessment and evaluation guidelines, in an effort to increase their consistent application by RSA staff. This progress toward uniform action was recognized by an AR team member in his exit interview: "*I think jumping to now, we want everybody doing the same thing … following the same guidelines, using the same documentation and all this stuff*." Completed with the aim of improving the RSA's evaluation process, the tactic created more rigid practices, which served to professionalize the evaluation given the greater consistency in applying RSA standards in institutional assessment. One team member claimed that this allowed the RSA to "*really protect and stabilize the process*." This served both the RSA, through its more efficient evaluative practices, and unaccredited institutions, through more uniform guidance and RSA expectations.

Another finding that emerged from the study was that the shift in the RSA's perception of unaccredited institutions encouraged an attendant shift in the type of feedback provided to institutions during the RSA evaluation. Prior to the study, RSA staff, including me, provided advice and direction regarding application questions and requests for modifications, but the intention of the RSA to educate institutions about the comments provided was not a routine expectation. Rather than explanation, the RSA focused on direction. The evaluation process following the project, however, has given increased attention to sharing knowledge—in large part an agency reaction to the actions implemented by the AR team. Through group discussion and debate, engaged in by the AR team and RSA staff, it was determined that misunderstandings could be reduced significantly by the RSA by attending to the manner in which it communicates. This effort was credited by one AR team member as being of value for all institutions regulated by the RSA. As she stated in her exit interview:

> *We need to think about how … we integrate all the things that we do, in such a manner that anyone coming into the portal ... which is our website, to be able to find things and find things in as interconnected or cross referenced a manner as possible*.

Not only would actions such as these improve the institution's ability to comply with RSA expectations, but could also, as one AR team member argued, assist the RSA to better serve students:

> *The agency can have a slightly different goal than the school, but ultimately it's all about students at the end, but over here, this agency has a goal and a mission in life, and so moving forward on that, quality improvement, doing this job better, making it clearer what their job is, making everybody understand that we get to the end, we do better things for the students.*

This study finding illuminated the ability of the RSA's institutional evaluation to serve multiple purposes. Not only are consumers protected through RSA efforts to privilege their interests, but institutions and students can also be aided through evaluative actions that promote consistency and quality improvement.

Change in Perception of the RSA

As a new employee of the RSA in 2011, I needed to be certain of who was "in charge" when it came to the relationship between the RSA and its regulated institutions. This included a consideration for who would lead the interactions, and who would make the final decisions relative to application of the law and RSA oversight. Agency culture inferred the more powerful party to be the RSA. While certainly much of the agency's hierarchy is set by state code, the privilege that comes with a role of authority certainly influenced my emerging perception of the RSA. Simply put, I believed the RSA made the orders and the institutions had to follow them.

This assertiveness then permeated to new staff, three of whom sat on the AR team since they were trained using similar guidance. This study encouraged the AR team and me—along with the RSA itself—to reexamine the role and position of the agency regarding institutional oversight. As a result, the study found that the RSA had shifted from being a regulator supported by rules and authority to one supported by education, rules, and authority if need be.

In the second dimension of the project, which focused on process evaluations, it became apparent that the RSA would no longer simply direct institutions. Instead, it was noted by an AR team member that the RSA was "*going to be working with institutions*." The use of "with" signaled, importantly, a shift in RSA position. In addition to collecting feedback on planned interventions along with suggestions for future improvements, the RSA also changed its role. The agency gave increased attention to developing into a teaching and support resource for the institutions. As an AR team member shared, "*we're really reaching out to the schools to ensure that they're doing it correctly. We're providing them with assistance to do it correctly, so that we're setting them up for success, rather than failure*." In addition to supporting institutions, the AR team also sought to support RSA staff in order to ensure they were adequately informed of the changes implemented as part of this project. This required the AR team to "*force feed a little more training*" in "*the areas of what we need to know and understand to communicate to the school on the front end*," as noted by one member. This meant that not only was the AR team required to put forth substantial energy to remain individually committed to the 12-month research process, but also that it was equally important for each member to encourage buy in and commitment from both the unaccredited institutions and the RSA staff. At the end of the project, in my capacity as the researcher, I believed that each AR team member was able to achieve this obligation.

Another aspect of the evolution of the perception of the RSA was the agency's ability to change. At the start of the study, the RSA operated in accordance with the idea that "*this is the way things are done because they've always been done this way*"—a belief supported by my observation of the limited number of internal change initiatives and the nonexistence of regular procedural critiques. This research project offered the opportunity for a transition because it required the RSA leadership to decide whether or not a research study would be permitted at the agency. Specifically, I requested the opportunity to lead a research study focused on the RSA evaluation of unaccredited institutions. The sponsorship agreement indicated that the sponsors viewed this topic as worthy of investigation and experimentation. Given their pledge to participate in the research process, the AR team members showed a deeper obligation to the problem as well as a general willingness to change. The implication of this commitment did not go unnoticed. One AR team member stated, "*The agency recognized the need to change. I think all businesses, all entities have the ability to change. They don't always recognize it*." This statement highlights the empowering breakthrough at the agency that resulted from the action research process.

A further finding associated with the change in perception of the RSA was the influence of RSA staff. While it was argued by one AR team member—who was also a long-term employee of the RSA, that "*we were always looking at ways to better, best encourage the schools to follow the rules*," this project was completely novel to the RSA. Never before in the agency's 26-year history had a formal research study been completed nor had a project been completed in such depth or so methodically. In this case, the collaborative nature of the project supported the willingness to participate and experiment using a methodology new to the agency. One AR team member shared, "*Because it's a group effort, people in the group want to get more*

involved in the effort." Furthermore, there was a recognition by members of the AR team of the quality of the individuals participating on the AR team and the ways in which this contributed to the success of project: "*Having smart people in here and looking at different ways to dissect this animal was tremendous*." The seven-person team was diverse in terms of experience, education, and personality type, creating a unique and complex ongoing dialogue that served to offer many perspectives on paths toward promoting positive change.

The project's success—which, according to one AR team member, impacted the agency "*dramatically*"—was due primarily to the RSA's acknowledgement of its ability to change. Engaging in the process and appreciating its benefits offered a positive experience on which the RSA is now able to model future change initiatives. The value of building such agency-wide confidence was illustrated by an AR team member in his exit interview: "*There's an old baseball adage that you can't get a hit unless you swing the bat. Well, what you try to teach kids as a coach is swing the bat. Don't be afraid."* In the context of the RSA, the impact of trying and succeeding has been significant for maintaining a positive, proactive outlook in relation to further change efforts. Positive statements made by AR team members about the project's impact included the following:

- "*As far as working towards a new culture, a new shift in the office, to where that's kind of an expectation now ... To work towards improvements and to assess where we are, and be critical of it and how to make it better, as opposed to just going with the norm because that's how it's just been."*
- "*So it just shows that we did this with this, we can do it with something else.*"

- "*Well, we're taking off. We're piloting this off the ground. It's not that we're going to come down again, but how can we remain aloft, and how can we obtain a higher altitude*."
- "*I think that it gives the agency a bit more clout as far as maybe who we are and what we do, especially perhaps in the eyes of other agencies*."
- *"[It's] kind of an expectation now ... to work towards improvements and to assess where we are, and be critical of it, and how to make it better, as opposed to just going with the norm because that's how it's just been.*"
- "*I think it gave us more of a responsibility to ensure that these unaccredited institutions are doing what they're saying they're doing, and hopefully that will translate into success for the student*."
- "*It's easier for us to protect [the state's] students if we support the institutions*".

As highlighted in these and other comments, an enhanced evaluation process supported institutional development, which in turn served students, the institutions, and the RSA.

Mirrored Quality Improvement

Accountability is the extent to which individuals, groups, and entities answer to assigned expectations and responsibilities. In an effort to identify areas in need of enhancement, this study focused originally on a critique of unaccredited institutions. This idea was exemplified by a statement made by an AR team member in his exit interview: "*To me, the big value of the project was to make sure that [it] was a model that would help the schools, the integrated schools, to be accountable with the process, which in essence helped them become … better school[s]."* Yet, as the project developed, the AR team expanded its focus to include an examination of the RSA as a whole, including not only opportunities for improvement but also, more critically, ways in which

the agency needed to change in order to accommodate the evolving expectations of unaccredited institutions.

At the beginning of the study, it was not clear that the team would evaluate both the institutions and the RSA. Yet as the project progressed, the AR team found it had illuminated the RSA's ability to more easily hold itself accountable by expanding its assessment lens to include itself along with the unaccredited institutions. This was achieved in part by including stakeholders, through surveys, information sessions, and real consideration of all feedbacks identified by an AR team member in his exit interview: "*The fact that your help allowed the school's input into the process was very valuable, which then helps the agency become more accountable."* The recognition that RSA accountability involved multiple parties and that it could be affected through improved communication was an important realization for the RSA as it sought opportunities for evaluation enhancement.

Stufflebeam's (1971) context input process product model was critical to the development of mirrored quality improvement, defined for this study as attention to developing enhanced practices for the RSA evaluation of unaccredited institution. Achieved through ongoing assessment of both the RSA and the unaccredited institutions, this was encouraged by the connective nature of the four-quadrant CIPP model; it continually encouraged a consideration of the quadrant of attention (i.e., context) in relation to the three other quadrants. The AR team adopted a holistic perspective to examine the impacts associated with institutional components affected by each quadrant. In this context, the team identified the RSA as highly influential in terms of its ability to enact change at the institutional level. Such change was possible through RSA evaluation requirements (e.g., annual student outcome data reporting). The value of including an evaluation of the RSA in addition to evaluations of the unaccredited institutions was

most apparent as the AR team began to discuss the process component of the CIPP model. At this juncture, some graying of project objectives began to arise. As one AR team member commented, "*those are two kind[s] of different end goals…of regulating them …or supporting them*." Marking a shift in RSA practices from oversight to collaboration, the team decided to move forward in a support role. This meant that the RSA would focus on assisting and empowering institutions rather than merely providing comment and acting as a gatekeeper excluding institutions not meeting prescribed standards.

By placing the RSA itself under the same evaluative lens typically used to examine institutions, the agency was able to identify internal weaknesses, which, once noted, the AR team was eager to address. For example, in considering institutional practices to use in the agency's self-assessment, the AR team suggested staff surveys as a means of collecting data. Once this recommendation was agreed upon, the team then discovered that the RSA had never utilized staff surveys. This realization spurred the development of annual RSA surveys implemented during the context evaluation phase of the CIPP model. Including an assessment of the RSA in an expanded effort to encourage quality improvement of the evaluation of unaccredited institutions helped the agency to address multiple weaknesses during the research process.

Conclusion

Private postsecondary institutions can be categorized in many ways; however, specific to their regulation and evaluation, accreditation status is an important distinction. Institutional accreditation, though often confused with authorization, affects much in relation to RSA oversight. By stratifying the review of institutions as either unaccredited or accredited, this study was able to better serve institutions and RSA staff. Furthermore, the RSA identified specific areas in which unaccredited institutions were under-regulated and thus required enhanced

evaluation. Changes implemented by the AR team resulted in improved RSA operations in a manner that encouraged quality improvements at the institutional level.

As a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions, the study found that there was considerable confusion concerning basic regulatory terminology; that institutional representatives were uncomfortable with the label "unaccredited"; and that there was value in a stratified review. The cultural shifts in the RSA system necessary for accommodating the implementation of new evaluation processes included changes in the perception of unaccredited institutions; the perception of evaluation; and the perception of the RSA. Furthermore, these shifts stimulated mirrored quality improvement, whereby the AR team encouraged positive progress at both the institutional and RSA settings.

CHAPTER 6

CONCLUSION

The purpose of this action research case study was to utilize Stufflebeam's (1971) Context Input Process and Product (CIPP) model to explore, test, and implement appropriate measures for evaluating unaccredited institutions. The study was guided by the following research questions:

1. What is learned by an action research team in a regulatory state agency system as a result of applying accountability approaches in the evaluation of unaccredited postsecondary institutions?
2. What cultural shifts are necessary within a regulatory state agency system to accommodate the implementation of new evaluation processes for unaccredited institutions?

Coghlan and Brannick's (2014) action research steps provided the methodological base from which the investigation into the evaluation of unaccredited institutions was initiated. While the project identified much relative to the process of an RSA's enhancement of unaccredited institutions evaluations, which are presented as findings in Chapter 5, this chapter offers two broader conclusions drawn from the study: 1. The CIPP Model Helps Identify Overlooked Systematic Components and 2. Perception Matters in Quality Improvement Initiatives. Researcher reflections are also included to provide insight into key learning achieved a result of the study. Furthermore, a description of significance of the study is offered to address the study's potential implications on the field of higher education evaluation and regulation.

Summary of Study

The regulatory state agency (RSA) of the study is responsible for oversight of private postsecondary institutions in the study state. This group of institutions includes those accredited and unaccredited. The researcher, as a professional staff person of the agency, was aware of the need to collect student outcome data from unaccredited institutions as part of RSA response to an audit. At the same time, she learned that the RSA was one of many state counterparts that had struggled to collect and use this type of data. Furthermore, she found there was no agreed upon best practice for evaluating unaccredited institutions as part of the state authorization process. This information was gathered through interaction with RSA counterparts at a national conference and in a review of the literature. As such, the research study was born. The project was sponsored by RSA leadership in June 2015 and was engaged by the Action Research team (AR team) between March 2016 and March 2017. The study began in May 2015 and culminated in October 2017.

Summary of Findings

Two key conclusions arose from this action research case study: 1. The CIPP Model Helps Identify Overlooked Systematic Components and 2. Perception Matters in Quality Improvement Initiatives. Conclusion 1 focuses on identified mechanical, methodological benefits utilized as part of the study while Conclusion 2 addresses a larger social concept, perception, and its role in learning and development.

Conclusion 1: The CIPP Model Helps Identify Overlooked Systematic Components

In this action research case study, the CIPP model was critical for identifying overlooked systematic components in the RSA review, and thus providing opportunities for interventions that could enhance evaluations. Additionally, a consideration of components previously excluded from an institutional evaluation encouraged the consideration of RSA aspects valuable in an

examination of its own effectiveness. The inclusion of the RSA, as a system, in the study of the evaluation of unaccredited postsecondary institutions occurred through a process of mirroring. Described in Chapter 4 in reference to the tree metaphor used in explaining the institutional system in relation to the RSA, the action research project spurred quality improvement efforts at both the institutional and agency levels. This comprehensive and progressive work was stimulated by the CIPP model, which encourages evaluation for improvement (Stufflebeam, 2011). Furthermore, in an effort to critically explore each of the model's quadrants, the AR team was able to recognize and challenge its assumptions concerning the institutions, the RSA evaluation, and the purpose of the RSA. This conclusion, ocused on the impact of perception, will be discussed further in the second conclusion.

The review of the literature, as presented in Chapter 2, indicated overwhelmingly that the CIPP model has been found to be a useful tool for evaluations (Boonchutima & Pinyopornpanich, 2013; Hurmaini, 2015; Khalid et al., 2012; Mirzazadeh et al., 2016; Mohebbi et al., 2011; Tokmak et al., 2013.). In addition to the systemic review encouraged by this model, each of these studies noted particular benefits of specific CIPP model quadrants (e.g. context, input, process, product) and how each offered unique insight for the evaluator. Khalid, Rehman, & Ashraf (2012) noted an example of one quadrant specific asset of the model. They found the context quadrant of the CIPP model allowed for a predefining of outcomes and goals, which in turn enhanced planning. What was missing from the CIPP model literature, relative to the purpose of this study, was the impact of this model when used in evaluations completed by an external authority (i.e. the RSA). There was also a paucity of research within the field of institutional evaluation and assessment. Here the researcher found no research that addressed, in any capacity, the review of unaccredited postsecondary institutions. This investigation of an

RSA's effort to enhance the evaluation of unaccredited postsecondary institutions came to a similar conclusion regarding the CIPP model as that found in the literature. The CIPP model is a valuable tool for providing a holistic yet focused evaluation. Interviews completed at the end of the study offered particular insight into individual AR Team member perspectives on the CIPP Model, all of which supported the conclusion that the model was valuable. Central to research team feedback was the feeling that the CIPP review process "*kind of hit all the bases*". This was because the model requires attention to four specific quadrants (context, input, process, and product), in contrast to one focused on inputs, which had been the norm for the RSA prior to the inception of the study. Expanding the evaluative lens to be more holistic was novel for the RSA and the researcher herself was initially uncertain as to how all the CIPP components could be incorporated into the agency's evaluation practices. Yet as the project progressed it became clear how the quadrants could work in concert. This evolutionally notion was expressed by one AR team member in her exit interview, "*You become familiar with more and more things within the quadrants. As you identify more and more things within each quadrant, you create more and more interaction possibilities*". This recognition of the innate interactions present in systems helped the AR team to develop a deeper understanding of the complex nature of unaccredited institutions which in turn served the action research process (plan, act, observe, and evaluate).

CIPP and AR Pair Well. Important for the bureaucracies present at regulatory state agencies, methodologies provide structure for research and experimentation, which can facilitate change. In the setting of this case study, CIPP and AR were supportive frameworks and compatible methodologies. Their parallel attributes include the encouragement of iterative review, methodological action, and an expanded lens for use in assessment. These similarities allowed for their easy alignment during the research process. In terms of the impact of

methodical guidance provided by the study, one AR team member stated, "*To be very honest, I've never worked with something as defined and purposeful as this*". In hindsight, during her exit interview, another AR team member spoke of the strength of the methodical progression encouraged by use of the CIPP model and AR:

> *I think that kept everything on track. We couldn't go off on tangents. We couldn't get lost in the weeds. It kept us focused, on this moment in time we're looking at this particular aspect of our problem with how we want to improve a particular thing. It just kept us moving in the right direction.*

The project was also empowered by both the CIPP model and AR methodology's emphasis on collaboration. The teamwork achieved by the AR team allowed for deeper critiques, more refined ideas for intervention, and a wider range of review and reflection that would not have been possible if the researcher had completed this project as an individual rather than as a team member. Everyone on the team was valued and encouraged to share his or her RSA expertise in a new research focused manner. While beneficial to the study, this type of research does require a deep committed to the project, including an agreement to participate for one year, and also to be willing to engage genuinely in the research project through ongoing discussion and debate. Though collaboration was achieved primarily through the use of a research team (the AR team), the project also included feedback from institutional and RSA stakeholders. The inclusion of stakeholders provided the AR team with access to alternative perspectives on the project and its interventions. This served not only to improve the quality of the study but also illuminated the powerful impact of perception on learning and change management, presented as Conclusion 2.

Conclusion 2: Perception Matters in Quality Improvement Initiatives

Central to this study was the illumination of the overwhelming impact of perception. In alignment with constructivist theory, which suggests "People create meaning through their interactions with each other and the objects in the environment" (Kim, 2001), perception is far more important than reality, especially when it comes to implementing change. A study long examination of the research setting found the RSA had created what it viewed as truths, built from experiences had, information reviewed, and topics discussed. This resulted in constructed perceptions of itself, others, and the interactions had between the two. These viewpoints (perceptions) had guided past agency actions and created current opinions, both positive and negative. This study's methodological structures, namely CIPP and action research, challenged these perceptions and encouraged a fresh consideration of those related to the evaluation of unaccredited institutions. This process helped the RSA to examine its role in evaluation. As a result of this assessment and critique, the AR team proposed the RSA could more effectively operate if it shifted from a focused role as an overseer to one of a supporter, while still maintaining a firm attention to compliance. This shift was achieved by prioritizing the development of educational resources intended to make it easier understand compliance guidelines. While it is debatable whether the agency's purpose is to teach institutions how to comply, the AR team felt that these efforts would increase the ability of institutions to meet RSA expectations. This could in turn improve institutional operations. In their work to enhance evaluations, the AR team also made great efforts to address potential perceptions held by unaccredited institutions. This helped the evaluators to better understand this group of institutions. Furthermore, while extremely influential, the study concluded that perceptions could change in response to education and experimentation. A detailed description of this reaction is

presented in Chapter 5 in the findings section related to research question 2, “What cultural shifts are necessary in the regulatory state agency system to accommodate the implementation of new evaluation processes?”.

Words Matter, but Perception More So. This study stratified the examination of postsecondary institutions regulated by the RSA by making a distinction between those accredited and those unaccredited. One finding, presented in Chapter 5, was the presence of confusion with higher education terminology. The central example of this was the misunderstanding related to the use of authorization and accreditation. While the case study attempted to address this problem, the researcher concluded that perception is more important than the definition of the term. If a consumer thinks the words authorization and accreditation are interchangeable, at the time of the use it does not matter if they are wrong… at least not to the individual with the misconception. Truth in the moment is a type of truth. Perception acts as a lens for viewing the world and, as such, what accreditation is perceived to mean is as important as knowing what it actually means. Relative to change management, it is impossible to enact quality change until the “changer” understands where its perception conflicts or misaligns with that of the “to be changed”. In this case, it was not until the RSA identified misunderstandings, and assessed their impact, that it could do anything to enhance its evaluations. Key to this conclusion the importance of supporting the need to change perceptions in order to grow closer to reality. This requires a consideration of one’s own perceptions of what is “correct”. Once these are identified, assessed and challenged, the “changer” must be ready to support any its claims of what needs to change and why. In this case study, this was achieved through education and ongoing support of the unaccredited institutions, all of which are described in detail in Chapter 4.

The recognition of the role of perception in change management was critical for addressing RSA accountability measures. As noted by Zusman (2005) public spending justifies the right of stakeholders to hold government entities accountable to achieving their mission. In order to meet this expectation, regulatory state agencies must be prepared to explain their actions and inactions. The enlightened perceptions that arose from the study satisfied this responsibility as the RSA developed an improved ability to hold itself and the institutions accountable to state law and agency standards. Accountability based evaluations can also develop external credibility (Stufflebeam, 2011). In the case of this study, there is now ample evidence to support that the RSA has made broad efforts to ensure that adequate and appropriate evaluation of unaccredited institutions is being completed.

Reflection on the Case

The intent of the study was to generate a change, specifically to enhance the evaluation of unaccredited institutions. This was accomplished and I found it was enabled through the presence of particular RSA resources. These included human resources (e.g. individual and group skillsets), time (e.g. committed to the AR process), support (e.g. leadership sponsorship, AR team, and RSA staff) and technical capacities (e.g. online database, RSA website). Most critical were the individuals of the AR team whose commitment promoted collective ownership of the problem, the project, and its impact, all of which encouraged success.

My own efforts were also vital to the project's success, as I was responsible for its management. While successful, in terms of the study's outcomes, at times the process felt long and drawn out. It was time intensive, detailed, and complex but this is what was required to generate transformative development for me. The study required professional growth in areas of vulnerability, leadership, and organization. I also learned that personal exposure was required to

address the problem as well as to spur my own growth. By stepping outside of my role as both a professional staff person and apprehensive doctoral student I enabled the experimentation that was necessary to prove that I could lead. Additionally, this shift in position was critical to push quality improvement in evaluation to the forefront of agency concern, when it had previously been sidelined by foci on other agency initiatives. While this new project required significant adjustments to be made by RSA staff, my own personal evolution also required sometimes awkward steps into the unknown. Examples of new situations included leading an institutional information session, where I stuttered through the first 5 minutes, and the yearlong responsibility to serve as an advocate for a new quality improvement focused RSA. There was pressure during this evolution, as I learned leadership primarily through doing, but with time I adjusted to a new normal. It was clear, that as a result of the project, I had changed. Prior to the study, I had been viewed positively. I was often asked to provide opinions on various RSA decisions and projects. This trust from RSA leadership resulted in my assignment to facilitate the development of new agency website and to guide the transition of RSA records from paper to electronic via a new database platform. These were management projects, though, and the research project required something different. It required leadership. No longer was I viewed as someone to have on a team; now I was seen as someone who could lead the team.

The confidence generated from this study was not limited to myself but also included fellow RSA staff persons. As I became empowered by an agency shift to quality improvement, others did as well. It was clear that we, as individuals and as group, were capable of purposeful and positive change initiatives. We no longer had to focus on regulation through control, but rather could effectively engage with a more powerful method of regulation, that generated by education and support. In hindsight, success, at least in terms of individual development, was

inevitable. This was due to my deep commitment to see the project and the study to completion. To see it through required shifts of perception as well as shifts in responsibility and role at the RSA. This transition of positionality within the group was felt both by myself and by RSA leadership and, as a result, I was promoted to an RSA leadership position shortly after the project culminated.

Significance

The private sector of higher education in the United States is the midst of a period of great turbulence as a result of oversight. Within the regulatory triad (the USDOE, the states, and the accrediting bodies) created by the Higher Education Act, recent prominent examples of transition have involved accrediting bodies and USDOE requirements. The widespread closure of ITT Technical Institutes, affecting 40,000 students across the country, in the fall of 2016 occurred as result of accreditor actions against the institution. The spring 2015 Corinthian Colleges closure and sell off, dubbed "The Largest For-Profit College Shutdown In History" by NPR (2015) affected 16,000 students and was a byproduct of USDOE sanctions against the organization. Additionally, the federal administration will soon determine if and how to introduce additional USDOE gainful employment regulations. If enforced, this will require that all programs (degree and certificates) offered by for-profit institutions, along with certificate programs offered by non-profit institutions, meet employment guidelines in order to maintain eligibility for federal student aid.

While the states have less power to affect change at accredited institutions, they often have the unique responsibility to oversee unaccredited institutions. The RSA chose to assess take this position for enhancement opportunities through a research project and study. By modifying evaluations for this group, the RSA found that it could better serve the institution and its students

through improved regulation. In this case study this was achieved through engagement with the CIPP model and the action research methodology. Critically, the RSA found that by recognizing the substantial influence of perception evaluators can better assess the system under review as well as its relationship to the evaluating body. An attention to perception includes those held of the evaluator, the evaluated, and the evaluation itself. Because misalignments in understanding and variant levels of knowing are often present, adequate quality improvement efforts are more effective after assumptions are challenged and, if necessary, perceptions shifted.

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Appendix A

Action Research Team Member Consent Form

UNIVERSITY OF GEORGIA
CONSENT FORM

Evaluating Unaccredited Postsecondary Institutions: The Development and Implementation of Appropriate Quality Metrics

Researcher's Statement
You are being asked to take part in a research study titled *Evaluating Unaccredited Postsecondary Institutions: The Development and Implementation of Appropriate Quality Metrics* by Laura Vieth, a student at the University of Georgia. The student's major professor, Dr. Karen Watkins, will supervise this research study. Contact information for the researcher and the supervisor is included at the end of this document.

Before you decide to participate in this study, it is important that you understand why the research is being done and what it will involve. This form is designed to give you the information about the study so you can make an informed decision about whether you want to participate. Please take the time to read the following information carefully. You may ask the researcher if there is anything that is not clear or if you need more information before making the decision. A copy of this form will be given to you.

Principal Investigator: Dr. Karen Watkins
University of Georgia Department of Lifelong Education, Administration & Policy
[redacted] or [redacted]@uga.edu

Purpose of the Study
The purpose of this action research study is to explore and test appropriate quality measures for use in unaccredited institutional evaluation. Using an accountability framework, a regulatory state agency (RSA) will enact evaluative changes in order to better serve students by modifying the institutional criteria reviewed and published by the RSA.

Study Procedures
If you agree to participate in this study, you will be asked to participate in an action research study as an action research team member. Your participation will involve one or more of the following activities during the next 12 months:

- Participating as a member of the action research team means participating with other action research team members to identify an organization's need, develop interventions, implement interventions, evaluate outcomes, and identify learning. The action research team meetings will occur in person or via conference call at a predetermined time and location. In each meeting, you will discuss your thoughts, interpretations, and ideas related to the topics presented via agenda in advance of the action research team meetings.
- Have contact with the researcher via telephone or email, if needed, for clarification on discussions or thoughts on the interpretation of the action research team meetings.
- Provide relevant documents that may help to further explain or illustrate the issues discussed in action research team meeting and other interactions. These documents will become part of the study data.
- Participate in a reflective interview at the end of this project to reflect on and share your insights and learnings related to the work of the team and the change process undertaken to develop a culture of informal learning

Risks and discomforts

There are no anticipated risks to you from participating in this research. The discomforts or stresses that may be faced during this study are minimal. Potential psychological discomfort may occur as questions are asked about your experience with the change initiatives related to this study. Any discomfort realized by participants will be minimized by assurances of voluntariness and promising confidentiality among the action research team and providing a safe and private environment.

Benefits

There is no direct benefit for participation in this study other than the opportunity to share openly and honestly about your thoughts, ideas and experiences related to developing and maintaining a culture of informal learning. There is an expected benefit to scientific knowledge as information from this study may help to improve the culture or efficacy of informal learning within and related to the department.

Incentives for participation

There are no incentives offered for participation in this study.

Audio Recording

The action research team meetings and reflective interview will be audio recorded in order to accurately capture all information. The recordings will be stored on password protected device in the researcher's home. All recordings will be destroyed 5 years after collection of data ends. All transcripts of meetings and interviews will be stored on the researcher's password protected pc and only the researcher will have access to these files. All transcripts will be destroyed 5 years after data collection ends.

Privacy/Confidentiality

Even though the researcher will emphasize to all participants that comments made during the research group meetings should be kept confidential, it is possible that participants say repeat comments outside of the group which the researcher has no control over. The data collected from

your participation in the study will be coded such that only the researcher will be able to link comments to individual participants. Data collected from you will be coded and the key to the code will be secured in a locked container (such as file cabinet or drawer) in a locked room. The key to the code will be destroyed 5 years after completion of data collection. The audio recordings will be destroyed 5 years after completion of data collection. You will be given a pseudonym to be used in any reporting. Your name and any other traceable identifiers will be removed from survey results and documents before reporting data or results.

Please note that internet communications are insecure and there is a limit to the confidentiality that can be guaranteed due to the technology itself. While the researcher may ensure the confidentiality of a participant by utilizing standard procedures (pseudonyms, etc.) when the researcher write up the final research product, the research cannot ensure confidentiality during the actual communication procedure. Data and analysis from this study may be used in the researcher's classes, dissertation for publication, and in presentations in seminars and research conferences.

Taking part is voluntary

Your involvement in the study is voluntary, and you may choose not to participate or to stop at any time without penalty or loss of benefits to which you are otherwise entitled.

If you decide to stop or withdraw from the study, the information/data collected from or about you up to the point of your withdrawal will be kept as part of the study and may continue to be analyzed.

If you have questions

The researcher will answer any questions about the research now or in the future and can be reached at the contact information below.

Researcher Contact information:

Laura Vieth

[redacted] or [redacted]@uga.edu

Supervising Faculty Contact Information:

Dr. Karen Watkins

Professor and Associate Department Head of Human Resources and Organizational Development

Lifelong Education, Administration, and Policy

7[redacted] or [redacted]@uga.edu

Questions or concerns about your rights as a research participant should be directed to:

The Chairperson, University of Georgia Institutional Review Board, 629 Boyd GSRC

Athens, GA 30602, (706) 542-3319 Email address irb@uga.edu

Research Subject's Consent to Participate in Research:
To voluntarily agree to take part in this study, you must sign on the line below. Your signature below indicates that you have read or had read to you this entire consent form, and have had all of your questions answered.

_____	_____	_____
Name of Researcher	Signature	Date
_____	_____	_____
Name of Participant	Signature	Date

Please sign both copies, keep one and return one to the researcher.

Appendix B

Exit Interview Protocol

As you are aware, this interview serves to support the action research project recently completed here. The purpose of this action research study was to explore, test, and implement appropriate measures for use in the evaluation of unaccredited institutions using Stufflebeam's CIPP Model.

First let me thank you for taking the time to provide valuable information which will assist in analyzing the project, and its accomplishments. The expectation is the study findings will support the agency with regards to how we evaluate institutions and also plan for future change initiatives. The purpose for conducting this interview is to get a better understanding of your experience exploring, testing, and implementing interventions related to the project. All of your answers will be confidential.

I expect that this interview will take between 45-60 minutes to complete and it will be recorded. I encourage you to speak openly about your opinions, experiences, and as you do please provide specific examples and incidences. Do you have any questions before we begin?

1. **Tell me about a time, during the course of this study, that you felt accountability was really being addressed. This can be an interaction with colleagues, the AR team, or with an institutional representative.**
   Follow up questions: How do you think the agency's ability to be held accountable has changed over the last year? What about the institution's ability to be accountable?

2. **Think about a time in our work together when you felt an aha! A moment when you saw things differently, or learned something new about evaluating unaccredited institutions?**

3. **In what ways has the agency's capacity for agency process improvement changed?**

4. **Overall, how would you describe the impact of the project on the agency?**

Appendix C

Institutional Survey (May 2016)

1. How many students were enrolled at your institution during the twelve month period prior to your last reauthorization application to [redacted]?
   a. 51-100
   b. 101-250
   c. More than 250

2. Do any other agencies or regulatory bodies require your institutions to report outcome data?
   a. Yes
i. If so, who? What?
   b. No

3. What limitations or difficulties, if any, would you expect to encounter if you were provided with a definition of "retention rates" and asked to report those rates?
   a. Fill in the Blank
   b. I don't expect any issues.

4. What limitations or difficulties, if any, would you expect to encounter if you were provided with a definition of "graduation rates" and asked to report those rates? Please answer "None" if you do not expect any issues.
   a. Fill in the Blank

5. What limitations or difficulties, if any, would you expect to encounter if you were provided with a definition of "placement rates" and asked to report those rates? Please answer "None" if you do not expect any issues.
   a. Fill in the Blank

6. What limitations or difficulties, if any, would you expect to encounter if you were provided with a definition of "licensure rates" and asked to report those rates? Please answer "None" if you do not expect any issues. Please "Not Applicable" if there is no licensure associated with the programs offered by your institution.
   a. Fill in the Blank

7. Would the publication of outcome data on [redacted] website have positive implications for [redacted] residents?
   a. Yes i. If so, why?
   b. No

8. Would the disclosure of outcome data by institutions to students have positive implications for students?

a. Yes i. If so, why?

b. No

9. Are there other measures you can suggest that would be important and/or reasonable to collect?

a. Fill in the Blank

Appendix D

Institutional Survey (November 2016)

The [redacted] ([redacted]) is currently working to evaluate its policies, procedures, and offerings relative to unaccredited authorized institutions and is again asking for your input.

As you are aware, [redacted] has experienced many changes over the last few years including, but not limited to, the application process, the website format, and most recently, additional requirements for institutions without accreditation. We know that it is has been an ongoing transition, and we seek to keep all institutions as informed as possible.

The focus of this survey is the support of evaluations. The questions are related to both the Standard 6 of the Minimum Standards and to supplement [redacted] support which may assist institutions in their operation. Please answer each question in as much detail as possible as it will assist [redacted] in its future development decisions. Thank you for your participation.

1. What successes and/or challenges have you encountered while implementing the new [redacted] Student Disclosure Form and collection of outcome data?

2. [redacted] is considering creating documents that may assist authorized institutions to better evaluate themselves and also to comply with GNPEC standards. Please rank the following potential resources (1-6 with 1 being the most valuable and 6 being the least valuable).

   Site Visit Guideline---Example Student Survey- Placement Record Spreadsheet- Catalog Guideline--Transcript Template- Student Enrollment Agreement Guideline.

3. What additional resources would you like to see made available on [redacted]'s website?

4. [redacted] is considering hosting training sessions for authorized institutions. Please rank the following potential topics (1-5 with 1 being the most valuable and 5 being the least valuable).

   Renewal Application Process—Site Visit Review---Change Requests----Program Evaluations--- U.S. Higher Education Oversight

5. What additional topics would you be interested in learning more about?

6. Do you prefer electronic communication (ex. Email, website postings, and online sessions) or face-to-face meetings?

7. [redacted] defines institutional effectiveness as the presence of short and long range evaluations of the programs offered by the institution.

   What value do you think institutional effectiveness has for the day to day operation of your institution?
   Extremely Unimportant-- Very Unimportant-- Somewhat Unimportant-- Somewhat Important—Very Important---Extremely Important

8. In terms of institutional effectiveness, what suggestions do you have that could assist [redacted] to better support your institution to be as successful as possible?

9. (OPTIONAL) What area of programming are you authorized to provide?

   Allied Health Certificate- Religious and General Studies Certificates and/or Degrees—Personal Training Certificate—Bartending Certificates- Massage Certificate--- Technical Certificates—Dental Health Certificates—IT Certificates

Appendix E

Institutional Survey (January 2017)

The [redacted] Commission ([redacted]) is seeking institutional feedback in order to evaluate its operations to better support your institution. The content of this survey includes questions specific to applications and agency procedures. Please answer each question in as much detail as possible as it will assist [redacted] in its future development decisions. All responses will be anonymous.

Thank you for your participation.

1. Where do you tend to gather information relative to [redacted] policies and procedures?

a. [redacted] Website

b. Standards Administrator

c. Professional Colleagues

d. Other (Please explain)

2. How practical is the [redacted] website (www.[redacted]) to navigate in terms of accessing information?

Extremely Difficult-- Very Difficult -- Somewhat Difficult -- Somewhat Easy—Very Easy --- Extremely Easy

3. What do you find to be most useful on the [redacted] website?

4. Have you had trouble finding information on the [redacted] website? If yes, what information?

5. What additional information would be useful to add to the [redacted] website?

6. What successes and/or challenges have you encountered working within the online platform, [redacted]?

7. What successes and/or challenges do you believe to be related to [redacted] site visits?

8. How helpful do you find [redacted] staff?

Extremely Unhelpful-- Very Unhelpful--Somewhat Unhelpful-- Somewhat Helpful --Very Helpful --Extremely Helpful

9. As an experienced user, what critiques and/or suggestions do you have regarding [redacted] procedures, staff, and overall communication of information?

10. What area of programming are you authorized by [redacted] to provide?

Allied Health Certificate-- Religious and General Studies Certificates and/or Degrees-- Personal Training Certificate-- Bartending Certificates-- Massage Certificate-- Technical Certificates-- Dental Health Certificates-- IT Certificates-- Other