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# The Changing Landscape of Accreditation: Guide to Secondary-School Recognition in the United States



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## Abstract

Accreditation in the United States has been and remains an integral aspect of the education system in the United States. Accreditation functions as the independent quality assurance mechanism to regulate elementary education through higher education institutions. Unlike in most other countries, there are no statutory regulations that require an educational institution to apply for or carry accreditation in the United States. In its infancy, accreditation comprised agreements between schools designed on streamlining the admissions process. At the university level, regional accreditation remains the highest standard of measuring quality of the educational institution. At the Kindergarten through high school level (K-12), regional accreditation is no longer the barometer. Instead, each state has autonomy to set standards for recognition. As a vital step in the credential evaluation process, it is the responsibility of the credential evaluator to determine whether the institution and/or program is appropriately recognized within its own jurisdiction, and, if not, whether it has relevant recognition elsewhere. ECE has traditionally used the foreign equivalent of regional academic accreditation at both the secondary and higher education level as our standard for recognition. In the changing environment of international education, the ECE® staff responsible for evaluation policy decided that we should review our methodology for determining whether a non-U.S. secondary school is “recognized” when it neither awards the national credential nor a recognized international credential. In this study, we analyzed the methods of K-12 accreditation and recognition in all fifty states, and which standards are used to regulate, if such regulation exists, operating schools within a state and within a jurisdiction. Based on the results of our survey, ECE has changed its approach to determining recognition of secondary schools throughout the world. This report presents our findings and recommendations.

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### I. Background and purpose of accreditation in the U.S., and its evolution

In the United States, accreditation as a mechanism of quality assurance has been and continues to be based on a voluntary self-evaluation process performed by institutions with oversight from non-governmental regional and national boards. Accreditation certifies that schools meet specific operational, programmatic and selected performance standards.

At the higher education level, because accreditation indicates an institution has met at least the minimum standards of quality, carrying regional accreditation can mean access to federal financial assistance, aid, and grants, this includes the Federal Pell Grant, the Federal Supplemental Educational Opportunity Grant (FSEOG); it also signifies that credits and degrees awarded by the institution are nearly guaranteed recognition by other regionally accredited schools and professional organizations. While the efforts to maintain a voluntary system stem from granting colleges and universities semi-autonomy, regional accreditation functions as a *de facto* requirement. Unlike in most other countries, there are no statutory regulations that require an institute to apply for or carry accreditation in the United States. At the elementary and secondary level, accreditation has a more precarious role. “Defining accreditation, and how it fits into the nation’s K–12 schools, is a patience-inducing exercise” (Oldham, 2018).

Elementary and secondary school, referred to in the U.S. as K-12, accreditation differs from that in higher education. There are no specific federal laws or regulations governing the recognition of associations that accredit primary and secondary schools, and the U.S. Department of Education has no oversight role with respect to school accreditation. Most states have laws requiring or encouraging accreditation for public schools and state- chartered private schools.

Schools that possess accreditation and state approval by authorities recognized at the state level are recognized schools in the U.S. education system. In addition, private schools that are accredited by other associations recognized by the federal Departments of Defense, Homeland Security, and State are also considered to be recognized. Among the largest private school accreditors are the National Council for Private School Accreditation (NCPA) and the Association of Christian Schools International (ACSI).

## History and Origins

The genesis of accreditation in the U.S. can be traced back to the 1870's when universities were searching for more efficiency in admissions. At the University of Michigan, after on-site assessment visits, graduating seniors from Ann Arbor High School could gain admission with the high school diploma instead of undergoing a battery of tests, collecting references, and writing essays. An incoming dean to the university urged school officials to apply the same quality assurance to a greater number of high schools, thus allowing a larger pool of students to apply and matriculate simply by providing a valid high school diploma. The process took on the name "accreditation through inspection".

The system of oversight carried out through site visits by university officials took hold, but eventually physical limitations as well as productivity goals created a need for alternative methods of gauging a school's effectiveness. Logistics necessitated the development of a self-reporting model.

Between 1895 and 1917, American colleges and secondary schools came together in five (later six) regional associations for consensus-building discussions about the developing system of American education. The movement of students from school to school, school to college, and college to college was on the agenda, along with other transactions that depended upon trust among institutions. The regional associations sought a voluntary method for identifying institutions capable of meeting their objectives and worthy of trust; accreditation was adopted as the name of this process.

Education reformers "created verifiable, recognizable standards for secondary schools, colleges, and universities throughout the nation" (Van Overbeke). The result led to more universities following the University of Michigan process, which in turn led to regional accreditation and self-reporting. The first regional accreditation boards grew out of this movement. This rigorous period of oversight development between 1895 and 1920 became known as the "Age of Standards".

The North Central Association of Colleges and Schools (NCA) began in 1895. By 1904, NCA had published a list of accredited schools. The Southern Association of Colleges and Schools (SACS), also founded in 1895, created a commission for secondary school accreditation in 1912. The Northwest Association of Schools and Colleges (NASC) accredited colleges and schools beginning in 1917; it formed a secondary school commission in 1927.

The organization that would become the Middle States Association of Colleges and Schools (MSA) began meeting in 1887 with the ambitious and broad goal to determine "the feasibility of calling a meeting of college authorities, with the objects of establishing closer relationships with one another and of procuring certain legislation in favor of educational institutions tending to this result." These early meetings led to establishing the College Entrance Examination Board, later renamed The College Board, and the creation of the Carnegie Unit, which was introduced to standardize high school achievement by means of a "unit of credit". The MSA did not form a Commission on Secondary Schools until 1921, but the pieces were in place. The New England Association of Schools and Colleges (NEASC) began accrediting private secondary schools in 1927, and later expanded its oversight to public secondary schools. The

challenge faced by the early accrediting bodies was to bring order and build relationships between the colleges and high schools of the regions.

For the next six decades, the highest U.S. standard for public and private secondary schools was regional accreditation. However, the process of accreditation had its limitations. Many institutions viewed accreditation as an end rather than an ongoing process. Once accreditation was granted, it was not unusual for schools to spend less time on compliance. There were no ongoing site visits. By the end of the 1970's, the country was calling for reform and the development of an improved system of accountability. Many reformers blamed accreditation's focus on the pre-accreditation process and quantitative analysis rather than qualitative approaches. New processes in accreditation were established in the late 1970's and early 1980's that expanded self-evaluation, accountability, and regular on-site visits. They focused more on ongoing processes of evaluation, formative, rather than the summative results.

In the 1980s, the U.S. Department of Education published "A Nation at Risk" that documented the drastic need for national standards and raised doubts regarding the quality of public schools. Outcries over failing schools led to the eventual establishment of vouchers, which provided public funding to students attending private schools, and charter schools, publicly-funded schools overseen by private organizations. These options provided parents increased latitude to choose which schools their children would attend through selective application processes. The first charter schools opened in the early 1990's. In 2002, the U.S. Supreme Court upheld the constitutionality of school voucher programs. In *Zelman v. Simmons-Harris*, the Court determined that when an individual uses public funds to make a private choice, that action does not violate the first amendment. Since this monumental Supreme Court decision, the private school population has experienced a dramatic increase. According to the National Center for Education Statistics (NCES), in 2018 there were nearly 7,000 charter schools in 44 states enrolling over 2.8 million students, or about 6% of the K-12 population.

To further address troubled public schools, the federal government enacted the No Child Left Behind (NCLB) legislation in 2002. NCLB stated that students must perform at a proficient level, according to each state's criteria. The law mandated that schools would receive negative consequences for falling behind state standards and would be rewarded if they met or exceeded expectations.

The foundations of NCLB were built on stronger accountability, more freedom for states, proven methods, and more choice for parents. Stronger accountability for results was intended to help close the achievement gap and ensure that all students achieved academic proficiency. Annual report cards were published to inform the community of progress, and schools that did not achieve progress were offered services in tutoring and after-school assistance. If progress was not seen within five years, major changes could be made in the school and funding could be dramatically cut.

The Every Student Succeeds Act (ESSA), enacted in 2015, is a further extension of the NCLB. ESSA was designed to ensure every public school provides a quality education for every child. It provides less oversight from the federal government and deploys greater autonomy to the states.

Today, there are four major regional accrediting agencies at the secondary level: Cognia (formerly AdvancED), the Middle States Association Commissions on Elementary and Secondary Schools, the Western Association of Schools and Colleges, and the New England Association of Schools and Colleges. Some conduct reviews nationwide, instead of primarily serving schools and districts in states in their geographic region, which was how they operated historically. However, the oversight of private schools is highly variable depending on state regulations. According to the U.S. Department of Education’s *Condition of Education* report, private school enrollment grew from 7% in 1990 to 10% in 2017. “Thirty-six percent of private school students were enrolled in Catholic schools, 39 percent were enrolled in other religiously affiliated schools, and 24 percent were enrolled in nonsectarian schools.”

According to Cognia data, approximately one in 10 high schools is not accredited. Graduating from an unaccredited high school can result in some detrimental consequences. Higher-education scholarships are only offered to graduates of accredited schools in nine states including Idaho, Indiana, Michigan, South Dakota, and Tennessee. Many post-secondary institutions, such as Arizona State University, require a high school diploma from a regionally accredited high school for admission, as do some state-based scholarship programs and military enlistment programs.

With the ESSA legislation, however, the emphasis in K-12 schools is more focused on accountability, and less on accreditation. As a result, the accreditation boards have been redesigning their accreditation standards. The differences between accountability and accreditation derive from the push to redefine state-based oversight and recast student achievement as quantifiable and qualitative in addition to ongoing and developing.

Accreditation boards in turn have transitioned from a strict criterion-based format to accountability standards as outlined by ESSA. States are mandated to develop accountability plans in order to receive federal funding. Accountability through reporting requirements includes developing academic standards, assessments, and rewards and sanctions. The focus is on both schools and districts and is typically driven by state or municipal legislatures.

Over the last few decades states have been granted more autonomy and less emphasis has been placed on K-12 regional accreditation. However, accreditation as a quality assurance mechanism is not going away in the discernible future. Private school accreditation is required in seven states for schools intending to participate in vouchers, public scholarships, and tax credit programs. Another 28 states and Puerto Rico define accreditation of private schools as voluntary, but parents rely on accreditation status to predict quality. In Wisconsin, for example, private schools enrolling students through the voucher program must be accredited. However, no private school must hold accreditation or recognition if it does not participate in a voucher program or seek to receive state funding.

Some states limit registration or approval to schools based on their accreditation status, while in other states accreditation can be substituted by registration, licensing, or approval. States possess the autonomy to determine which types of recognition must be followed and some states, such as Arizona, exercise no requirements in accreditation, registration, licensing, or approval.

There are limitations to state autonomy. Even as more choice has been handed to parents, accreditation is often the most desired quality in a school and the clearest indication of quality assurance. While the foreseeable future of K-12 accreditation may seem hazy, it is clear enough that methods to determine a school's quality in education will be in place for other institutions and parents. What accreditation will look like and how it functions in the new accountability landscape is a quickly developing picture.

## II. Credential methodology for institutions located in other countries, how their recognition status is determined and how credential evaluators decide what the equivalent of US regional academic accreditation is

As a vital step in the evaluation process, it is the responsibility of the credential evaluator to determine whether the institution and/or program is appropriately recognized within its own jurisdiction, and, if not, whether it has relevant recognition elsewhere. This is particularly important at the secondary level because many institutions and programs were developed with the intention of preparing students for post-secondary education in other countries.

Official degree- or diploma-granting recognition is the status that allows for credentials earned at a specific institution (or in a specific program) to be used for purposes of employment, further education, and reciprocal acceptance in other institutions or programs. Typically, the status is conferred by officials of the country in which the institution is located. However, with transnational, distance, and online education, the recognition authority is not always easily determined. In many countries the Ministry of Education or Ministry of Higher Education confers that status, but sometimes it is public institutions in the country that determine the recognition of private institutions. In many cases, private institutions are licensed to operate, without giving their credentials academic recognition.

There are also educational programs that prepare a student for examinations given by a professional board or membership body. The status of these programs can be determined by the acceptance of the program completed there as degree equivalent at public universities in the country, or exemptions granted in public university programs. In some countries the governmental body overseeing recognition reviews programs rather than entire institutions, and may grant recognition to some, but not all, programs at an institution.

A number of these models exist for institutions at the secondary level.

In countries where there is no national capstone examination, and individual institutions award the leaving credential, recognition is established by a public entity. For example, the Tokyo Metropolitan Board of Education confers recognition status on secondary schools in that city. In the Philippines, the Department of Education approves institutions, which award the final diploma.

In countries where there are national or other "external" examinations, recognition of the educational program is conferred by the passing of the examination. Typically, there is oversight of the institution by a public entity, but ultimately the benchmark is achieved by passing the national examination. There are many examples of this model, including the France and French-based systems that lead to a

“baccalaureate,” British-based systems that lead to General Secondary Education Certificates, as well as countries like Ethiopia, the Scandinavian countries, and many others that have national secondary credentials awarded upon successful completion of a standardized examination.

There are also secondary schools around the world that prepare students for international examinations such as the International Baccalaureate.

Additionally, there are schools organized by public or private entities for the purposes of refugee education. Many models occur, including one in which recognition of the institution is provided by the host country, another in which a program leads to a national or international examination, and one in which a credential is awarded by an international organization such as UNESCO or UNWRA.

Another model, which is becoming more prevalent, is one in which the school does not award the national credential but is recognized by an accreditation body not associated with the country in which it is located. There are examples of secondary schools around the world that teach a U.S.-style curriculum, but which may or may not be recognized by a U.S. regional accreditation agency. There are also institutions that seek recognition from an accrediting body associated with a specific religion or religious organization. There are an increasing number of oversight bodies that have processes for reviewing and accrediting secondary schools. Examples include Accreditation International, Accrediting Commission International, the American Montessori Society, the Council of Bilingual Schools, the Council of International Schools, and many others. Many are legitimate, while others have been established solely to “accredit” and legitimize diploma mills.

For the purposes of admission to institutions for which a high school diploma is required, the evaluator or admissions professional must determine whether the student has earned the non-U.S. equivalent of that credential. In order to do so, one must first answer the question, what is a high school diploma? At essence, it is the benchmark credential confirming completion of secondary school and, often, eligibility for higher education.

Practically, there are as many definitions as there are school districts that award the high school diploma. Most U.S. states have a required number of Carnegie units that must be earned, typically with unit requirements for English, mathematics, social science, science, and health or physical education.

### III. International schools (schools that are not part of the educational system of the country in which they're located) and their accreditation

In an increasingly global economy, the education sector has been challenging boundaries for decades. There exists ample literature on “the exponential growth of international schools and educational programmes of the International Baccalaureate organisation (IB), the Cambridge Assessment International Education (CAIE) and other private providers of international education.” (Steiner-Khamsia and Dugonjić-Rodwin) These private providers of education work with the partner schools, provide the curriculum, and supply assessment resources. As part of the partnership, the schools follow the foreign curriculum rather than the national or locally designed curriculum.

In the United States, IB programs were first offered in private schools in the 1970's. By 2010 there were over 700 American high schools, both public and private, offering the IB Diploma. There are now 942 American high schools offering the IB Diploma Program. IB World Schools operate in over 150 countries and the diploma program is offered in over 5,000 schools. The IB Diploma is accepted globally for university admissions.

The CAIE is also one of the largest providers of international education programs and qualifications for primary and secondary students. The International General Certificate of Secondary Education (IGCSE) is taken in over 150 countries and offered in more than 4800 schools worldwide. With the IB Diploma and the CAIE programs, secondary schools may be recognized or approved to operate in their respective countries but the oversight for the final qualifications comes from the IBO and CIE. The schools in these situations operate with the oversight of private organizations in conjunction with governmental approval and offer portable qualifications with international recognition.

In addition to private organizations' involvement in international education, current research chronicles the rise of public examinations conducted abroad. This has become more common in the United States and more prevalent in myriad countries in the Middle East, for example in the United Arab Emirates (UAE). A manifestation of this model can be found in the French international schools in the United States. The schools offer students the opportunity to sit for the French Baccalaureate, where the success rate is an average 98 to 100%, and the curriculum is fundamentally French. These international high schools prepare the students for the examinations required to earn the Baccalaureate instead of preparing students to earn a U.S. style high school diploma or sit for the SAT or ACT examinations, as most traditional U.S. students would do.

The United States is far from an outlier. More than 250 French schools operate in more than 100 countries and provide access to the French Baccalaureate, thus bypassing the national education system's benchmark credentials.

In the UAE, students enrolled in Indian style schools sit for the examinations of the Central Board of Secondary Education (CBSE), a public board of education overseeing public and private schools in India. The CBSE was created by legislation passed in India. The UAE, like other Middle East countries, such as Saudi Arabia, provides licenses to the high schools that operate there, but the quality assurance is provided by the Indian examining board. High school graduates from these schools do not receive the credential awarded by UAE education system schools, i.e., the General Secondary Education Certificate. Instead, they receive the All India Senior School Certificate.

Among the catalysts for the increase in international qualifications has been the UN-directed global push to achieve Universal Basic Education (UBE) and a more concentrated focus on developing qualified secondary school graduates who are effectively prepared for further, higher, and lifelong education. In the late 1980's, China was faced with widespread low literacy rates. The Ministry of Education increased primary and secondary expenditures, opened more public institutions and raised literacy awareness. By the 2010's, China had reached many of the goals designated in the five- and ten-year education plans

through highly centralized and controlled curriculum. As educational objectives were met, however, and the government took the more open view toward economic growth, private secondary schools began cropping up especially in wealthy communities. What effect the increase of private education will have remains to be seen, but several years ago, it would have been nearly unheard of to study a U.S. or British curriculum in China. Today, U.S.-style, British- style, IB programs and others can be found in almost every major city and scattered throughout the country.

With the mass mobilization of educational credentials and qualifications, accreditation has become a more challenging riddle to unravel. In the U.S., part of the accreditation process involves on-site assessment following an institutional self-evaluation report. In cases of international schools, on-site assessment poses a new and unique obstacle. When international schools adopt international curriculum, quality assurance can be viewed as occurring through the international organization offering the qualification. While educational recognition has evolved, relying on accreditation as a quality assurance mechanism is still vital to higher education institutions and other professionals who work with international students, and parents/guardians trying to find the best education for their child. It is as important as ever to have in place transparent and practical accreditation standards because, just as the expansion of high schools in the United States created the necessity for the creation of accreditation boards, the continued growth of international students requires the improvement of international oversight.

#### IV. Our current perspective on the recognition of international schools.

ECE has traditionally used the foreign equivalent of regional academic accreditation at both the secondary and higher education level as our standard for recognition.

Accreditation has been defined as a “voluntary process conducted by peers via non- governmental agencies . . . to attempt on a periodic basis to hold one another accountable to achieve stated appropriate institutional or program goals [and] . . . to assess the extent to which the institution or program meets established standards” (Kells, 1994). We have illustrated in this paper that the assessment of high school accreditation is no longer restricted to a handful of regional accreditation boards. Accreditation has become an international endeavor. It can be proposed here that establishing principles for accepting accreditation, from the perspective of the institution, is a necessary process to ensure quality improvement and governmental recognition.

The U.S. has moved a long way from the time when the federal government published annual lists of regionally accredited high schools. Facilitating accreditation effectively means moving beyond the viewpoint that accreditation is a periodic exercise that must be tackled with minimal effort and compliance. In recent decades, student learning has been the driving force behind accountability and accreditation requirements, and institutions should make every effort to focus their resources and strategic planning on making this the highest goal on their operational agendas. Higher education institutions also need to recognize the varied routes to oversight and quality assurance beyond that of regional accreditation.

In the changing environment of international education, the ECE® staff responsible for evaluation policy decided that we should review our methodology for determining whether a non-U.S. secondary school is “recognized” when it neither awards the national credential nor a recognized international credential. The first stage of the review led to the determination that we would be open to accepting accreditation by organizations other than U.S. regional accrediting agencies. With that decision came the responsibility for reviewing the various agencies and their accreditation processes.

One example of this type of analysis was our review of the Council of International Schools (CIS) accreditation process. As part of our review, we scrutinize the accreditor for evidence of adherence to recognized standards, and to utilizing a process that provides not only an evaluation of the institution, but also guidance going forward and continuing challenges for the institution. We look for clearly articulated standards that review curricula, school leadership and staff, teaching, assessment, attention to student well-being, and other aspects of the school environment. These are necessary characteristics of a thorough evaluation of a given institution. We also review whether the accrediting body is recognized by an organization that oversees accreditors and also meets its standards.

Current ECE® policy is to recognize international secondary school credentials from institutions that have at least one of the following forms of recognition:

1. School is recognized by the government of the country where it is located and awards that country's leaving credential.
2. School awards a recognized international credential.
3. School has U.S. regional academic accreditation or is accredited by at least one of the other accrediting bodies that have been vetted by ECE.
4. School is not overseen by the government of the country where it is located, but the responsible local governmental body (e.g. Ministry of Education) awards a credential or equivalency statement that confirms approval of the school's program.

If a secondary-level institution does not meet any of these criteria, then it is judged to be the equivalent of an unaccredited institution in the United States.

Ultimately, as part of the evaluation process, the credential evaluator must “determine whether the institution and/or program is appropriately recognized” (TAICEP ["Guide to Credential Evaluation"](#)). In its historical context, accreditation is the primary quality assurance mechanism for an institution. For an increasing number of institutions around the world, appropriate recognition is no longer the function of an oversight body of the country in which they are located, but rather an independent accreditor. Institutions must decide whether the school’s accreditation meets the high standard traditionally set by the regional accreditation agencies.

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