



BIASES IN QUALITY ASSURANCE:

A POSITION PAPER ON HISTORICALLY
BLACK COLLEGES AND UNIVERSITIES AND
SACSCOC

“The goal of accreditation is to ensure that education provided by institutions of higher education meets acceptable levels of quality.” (Source: U.S. Department of Education)

Maintaining good standing with accreditors has become a high-stakes endeavor for American colleges and universities. Initiated as a voluntary effort to assure institutional quality to students, parents, educators and employers among others, accreditation has become a gatekeeper required to issue federal student aid. This essentially grants accrediting bodies with de facto authorization rights for postsecondary institutions to exist. This evolution in the role of accreditors has led to questions about whether they exceed their mandate, the burden of regulatory compliance that hangs over institutions and how effective are accreditors in living up to their original mission of quality assurance (Phillips & Kinser, 2019). The Department of Education has entered the fray with a recent publication titled *Rethinking Higher Education: Accreditation Reform* (U.S. Department of Education, 2018) which includes several proposals for improvement in the accreditation space. Further indications of the dissatisfaction are evidenced in a sampling of recent media coverage on the topic:

- A Fight is Brewing in Washington Over College Accreditors (Douglas-Gabriel, *The Washington Post*, 2015)
- Education Department Beefs Up Accreditation (Camera, *U.S. News and World Report*, 2015)
- Issues of Accreditation Predominate in New Rulemaking Announced by Education Department (Kelderman, *The Chronicle of Higher Education*, July 2018)

As accrediting agencies have attempted to demonstrate their usefulness and relevance, historically black colleges and universities (HBCUs) and other minority-serving institutions have been caught in the crosshairs. The relationship between HBCUs and their primary accreditor, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), has been fraught with undulating degrees of difficulty since HBCUs initially sought membership prior to WWII. The increasing rate of sanctions in recent years has been cause for alarm within the sector and should be a matter of concern for all of higher education given the role and impact of the nation’s HBCUs in educating large proportions of low-income students.

There is a dearth of research on accreditors and their influence on or relationships with institutions. However, Donahoo and Lee (2008) concluded that decisions handed down by regional accreditors are inconsistent and unpredictable and that minority-serving institutions, including HBCUs, tend to receive harsher sanctions than other institutions. The authors note that negative media coverage associated with accreditation sanctions tend to reinforce prevailing stereotypes about HBCUs which limit their access to funding and other types of support that can strengthen the institution and prepare them to respond to these same sanctions. Therefore, the negative actions disproportionately handed down by SACSCOC to HBCUs often compromise the very institutional quality they are charged with assuring.

Given the disproportionate number of sanctions levied by SACSCOC against HBCUs as documented in this paper, the dynamic forces driving change across the American educational landscape, the necessity of regional or national accreditation to award Title IV funds (federal financial aid), and the fact that the Department of Education recognizes both regional and national accreditation as the primary criteria for institutions to award federal financial aid, HBCUs must confront the challenges they face with regional accreditors in order to maintain institutional solvency for future generations of students. Therefore, this position paper establishes a four grievances HBCUs have with SACSCOC¹:

¹ Seventy-seven of the 101 HBCUs (76 percent) are regionally accredited by SACSCOC. Given this preponderance of members, this discussion focuses on their standards.

- Uncertainty in the Peer Review Process: Peer Selection, Definition and Potential Biases
- Process Ambiguity and Lack of Transparency
- Lack of Exposure to SACSCOC Self-Assessments and Evaluation
- The Need to Weight Standards by Institution Size and Type

HBCU leaders welcome the need for accountability but want it to be equitable, fair and based on a set of standards that reflect the range of missions and institutional types that exist within the region. These issues are presented here to stimulate a dialogue with accreditors about the future of HBCUs and other underfunded low-resource institutions that operate on tight margins but serve a necessary role within the U.S. higher education enterprise. Throughout the paper, we provide recommendations that can lead to corrective action.

Historical Context

SACS was established in 1895 and their Commission on Colleges was founded in 1912. By policy, HBCUs were not allowed full membership to SACSCOC until 1930. Prompted by a grant from the General Education Board, selected HBCUs could apply after 1930 but none were afforded full membership (Clement, 1966; Donahoo & Lee, 2008; Trent, 1959). This limited access to regional accreditation forced HBCUs to create their own accrediting body in 1933, the Association of Colleges and Secondary Schools for Negroes (ACSSN). ACSSN was not an independent accrediting body and required prospective institutions to have approval from SACSCOC or another regional group. ACSSN ceased operations in 1964, but not before working with SACSCOC to facilitate extending membership to HBCUs starting in 1956 (Clement, 1966; Donahoo & Lee, 2008; Trent, 1959).

HBCUs, especially those within SACSCOC, have found themselves under sanction at a higher rate than non-HBCUs. According to an analysis from the Association of Public and Land-Grant Universities, 29 HBCUs were placed on warning and 20 were placed on probation during the 15-year period from 1998 to 2013 (Lee & Keys, 2013). While there was certainly some duplication amongst these 49 institutions as some on warning later moved to probation status, this reflects a rate of sanction for HBCUs considerably higher than that for the almost 800 SACSCOC members during the same period. As an example, UNCF has lost four member institutions since 2000 due to their removal from SACSCOC membership (Morris Brown College, Barber-Scotia College, Paul Quinn College, and St. Paul's College, with the latter formally closing) and almost a quarter of the 37 private HBCUs that comprise UNCF membership were sanctioned between 2015 and 2018.

Uncertainty in The Peer Review Process:

Peer Definition, Training and Selection and Potential Biases

SACSCOC employs peer reviewers as part of the accreditation and reaffirmation process for its member institutions. The [SACSCOC website](#) for evaluator training notes that “peer review is the backbone of the SACSCOC accreditation processes,” and cites peer evaluators as a “core asset”. Teams of peer evaluators are selected from a pool of volunteers employed by SACSCOC-accredited institutions and are led by a committee chair and a commission Vice-President. During the reaffirmation process, peer review teams conduct a visit to the institution to evaluate their compliance with standards established by SACSCOC.

The peer review process is a commonly accepted practice employed by other regional accreditors as a method for assessing institutional compliance. The issue that exists is the ambiguity around how SACSCOC defines, selects and assigns peers to specific institutions. While there are considerable resources on the accreditor's website for peer training and obligations, clearly outlined guidelines and policies for peer selection and assignment appear to be non-existent. We posit that institutions should understand who are considered their

peers and how they are assigned to institutional review teams. “Peers” in the sense of other professionals in higher education is a broad definition; however, we believe that true peers are employed by similarly situated institutions and have a deep expertise of the area they are evaluating in order to provide a more accurate assessment of institutional compliance. Complimentary to this issue is how peer reviewers are trained, selected and assigned to institutions. Peer reviewer training should be based on industry-wide professional standards with a focus on reducing and eliminating implicit biases. Should a small, private liberal arts institution have peers on their review team from large, public flagship universities? We say they should not in order to shield against a resource bias that might possibly exist. The same should be true for public or private HBCUs, which should have review teams that consist prominently of peers within their sector. ***Recommendation 1: Create clear guidelines for peer definitions, training to reduce implicit bias and peer assignments that take institutional type and mission into consideration.***

While many consider a voluntary peer process to be nondiscriminatory or equity-driven, bias may be written into the standards themselves. Thus, more peer reviewers from HBCUs or small liberal arts institutions may not be the sole solution as one study shows that HBCU reviewers attempting to follow the standards may be biased against similar institutions. A study on peer academic reputation scores for national ranking systems found that HBCUs use biased standards of measurements against other HBCUs (Jones, 2013). Examined through a Critical Race Theory lens, this study found that “HBCU administrators (either consciously or unconsciously) simultaneously decry the dominant ideology used to assess colleges and universities while employing the same criteria in their own assessment of institutions” (p. 138). Therefore, it is likely that implicit and racial biases of HBCU performance can impact both HBCU and non-HBCU peer reviewers. “Even within a subset of institutions which have been devalued by the adoption of assessment standards established by elite, wealthy, and predominately white institutions, this ideology appears to have become an internalized norm among HBCUs administrators” (p. 139). This research indicates that HBCU employees within the same sector (public vs. private) may be less inclined to this sort of bias.

To further reinforce potential biases in peer review processes, the National Institutes of Health (NIH) found in a study of their own scientific review process that biases existed in awarding research grants, particularly against black researchers (Tabak & Collins, 2011). Even after controlling for a number of factors, including education, country of origin, training, employer characteristics, previous research awards, and publication record, biases persisted to such a degree that forced Tabak and Collins to conclude that “as uncomfortable as it makes us, we must acknowledge that the differences observed may reflect biases that are insidiously interwoven into the basic fabric of the merit/reward system of science” (p.940). This NIH self-study revealed implicit biases in their focused review process for research grants, which implies that a deep review of the peer-review process in accreditation reaffirmation is warranted.

With a program so heavily focused on volunteer individual peer judgments and perceptions, within a system based on principals largely developed prior to deep HBCU involvement, we are interested in a deeper understanding of how equity is built into the process to guard against implicit bias. Equity considerations are of particular interest in a region with a history of contentious race relationships and with an accreditor who marginalized HBCUs for its first several decades. We believe it is time for SACSCOC to conduct a deep self-assessment to determine if and to what extent bias exists within its processes against the most vulnerable institutions (e.g, HBCUs, small privates, other low-resourced institutions). ***Recommendation 2: SACSCOC should conduct an independent third-party review of its processes, standards and policies investigating the presence of implicit bias against certain types of institutions.***

Process Ambiguity and Lack of Transparency

Documentation on the requirements for accreditation and how the process is enacted is plentiful across SACSCOC websites and manuals. However, this clarity does not extend to follow-up documentation on decision-making by the committees. This leads to a lack of public transparency and institutional understanding around what is arguably the most contentious matter for which the accreditor is responsible: placing an institution on sanction or removing their accreditation. Further evidence of the lack of transparency is the difficulty in finding publicly available historical information on sanctions. SACSCOC annual reports going back to 2006 are available on the website and sanction information can be gleaned from those; however, the format is not ideal for research purposes which does not afford transparency on the history of accreditation actions. **Recommendation 3: Make SACSCOC and all regional accreditor sanction data publicly available to allow for greater transparency about sanction decisions.**

Contributing further to the lack of transparency is formalized ambiguity that is written into the SACSCOC accreditation process. The standards as outlined are subject to the interpretation of individuals conducting the evaluation. What makes an institution financially secure and stable? The [SACSCOC manual](#) states that when peer evaluators are considering financial and physical resources they may consider “a sound financial base like total net assets, unrestricted net assets (without donor restrictions), endowment balances, UNAEP (unrestricted net assets exclusive of plant and plant-related debt), reserves, select ratios or benchmarks, and so forth” (SACSCOC, 2018, p. 123). SACSCOC does give institutions the option to use the Composite Financial Index (CFI) as a tool in financial analysis. However, the manual goes on to state that “*there is no one way for an institution to present a case for sound and stable resources base, or for a peer evaluator to evaluate it*” (SACSCOC, 2018, p. 123). Such subjectivity allows for a level of reviewer bias that could skew their assessment; thus the institution’s future and the future of their students is largely based on the impressions of individuals from dissimilar campuses who are using an ambiguous standard to evaluate an institution’s resource base.

The uncertainty of their financial assessment calls into question how institutions prepare for a review of the standard. There is no clear understanding through SACSCOC policies of the explicit and specific criteria an institution needs to abide by to be considered financially secure and stable. With such ambiguity and room for self-interpretation, this further brings into question the peer review process and the lack of transparency within the accreditation and reaffirmation process. **Recommendation 4: Establish clear guidelines for how institutions should present their financial stability based on institutional type and resources.**

Lack of Exposure to SACSCOC Self-assessments and Evaluation

Higher education experts noted at the recent conference for the Western Association of Schools and Colleges (WASC) that the accreditor’s standards related to the measurement of student learning outcomes were ineffective (Lederman, 2019). This discussion demonstrates one way a regional accrediting body can engage its member institutions to improve its processes. There are other steps an accrediting body can pursue to assess its processes.

A tangible way to demonstrate an assessment of its processes is to communicate the reliability and validity on how it determines whether an institution meets minimal quality standards. A review of the SACSCOC documentation does not reveal the reliability and validity of its rubrics used in the accreditation process. This does not mean that the psychometrics on the assessment process have not been developed. It is not, however,

easily found in publicly available documents. At a base level, reliability represents consistency of measurement while validity supports whether an assessment process measures what it purports to measure (Creswell, 2014). The College Board, for example, publishes a reliability coefficient for the SAT exam. In 2014, the reliability coefficients for the four test sections ranged from 89 to 94 providing evidence that the SAT is a reliable instrument (College Board, 2015). While SACSCOC cannot perform the same type of reliability testing used for a standardized exam, it can perform inter-rater reliability testing. The value of this is that institutions would have greater confidence that judgements of review panels can be trusted regardless of the panel. If SACSCOC has completed this type of review, making this information publicly available would help HBCUs and their advocacy groups have greater confidence in SACSCOC and its judgments.

Paul Quinn College in Dallas, TX represents a brief case study on the importance of validating the accreditation process. The institution lost its accreditation in 2009 despite significant progress it had made during its probation period (Jaschick, 2009). To maintain its ability to continue, Paul Quinn received accreditation from TRACS in 2011. IPEDS enrollment data provides important information. Paul Quinn was put on probation in 2007 when its fall enrollment was 784 students. There is evidence that the probation status harmed the institution as enrollment fell in Fall 2009 to 445 students, a 43 percent decrease. In Fall 2010, the year following its loss of SACSCOC accreditation, enrollment decreased another 62 percent to 171 students. Rather than struggling to maintain operations after losing accreditation, however, Paul Quinn has rebounded. Fall 2018 enrollment was 519 students, a 203 percent increase since Fall 2010. In 2018, the institution also opened a satellite campus in Plano, TX (Edwards, 2018). While not a definitive statement, Paul Quinn's success since their removal from membership at least suggests that SACSCOC should examine the reliability and validity of its process to support its use.

Given the high-stakes nature of accreditation, the regional and national bodies can increase the transparency of their processes. This self-assessment would support SACSCOC work and increase the trust its member institutions have in the accreditation process. ***Recommendation 5: SACSCOC should conduct reliability testing of its standards to determine the extent to which they assess an institution's quality compliance.***

The Need to Weight Standards by Institution Size and Type

HBCU sanctions are largely due to perceived non-compliance with financial standards instead of those in the academic arena. Additionally, a deeper look at the accreditation standards calls into question how model schools are categorized and how HBCUs, small institutions, and others in the low-resource category tend to be perceived as deficit models, instead of models of possibility.

Accreditation processes do not reflect diversity of mission or institutional type. Large, wealthy, predominately white public institutions are evaluated using the same criteria as small, historically-underfunded, HBCUs or community colleges. Thus, institutions with missions to serve underserved students and communities, which often have minimal resources and reflect the communities they serve, are not well-represented in the standards. Given the history of SACSCOC, the accrediting standards were developed for completely different types of institutions and student bodies. Additionally, many HBCUs, including all 37 UNCF-member institutions have religious affiliations that are not represented in the standards. President of Paul Quinn College, Dr. Michael Sorrell, noted that the Christian principles of the Transnational Association of Christian Colleges and Schools (TRACS) were important to his institution. If the variances in institutional type and mission, which are indicative of the type of education each institution provides for its specific student body is not considered, then those less-represented institutions will continue to be undervalued and misunderstood in the accreditation process. TRACS

President, Dr. Timothy Eaton, has commented on this perceived bias against smaller institutions noting that accreditors “expect smaller institutions to operate like larger institutions. And that may simply be a disadvantage that a small institution has to live with” (Jones, 2019).

The privileging of institutions based on their size, resources or perceived prestige influences the lenses through which standards are applied during the reaffirmation process. While circumstances have improved under the current president, biases against HBCUs persist. Speaking to *SmartCityMemphis.com* in 2007 regarding LeMoyne-Owen College, [Dr. Wheelan noted](#) that HBCUs have sometimes gotten into hot water “because they were trying to live beyond their means.” In commenting to *Inside Higher Education* in December 2018 regarding SACSCOC’s decision to remove Bennett College from membership after two years on probation, Wheelan stated “I’m afraid we’re going to see more and more small private institutions either close or get dropped from membership or merge, which is what I would hope they would do so their legacy is not lost” (Seltzer, 2018). Accrediting agencies are tasked to make judgements on whether an institution meets or exceeds minimal quality standards. It is, perhaps, inappropriate for a leader of an accrediting agency to recommend that institutions merge or make recommendations beyond what is required to meet a minimal quality standard.

Countering these statements on HBCUs, Dr. Wheelan took a somewhat apologetic approach to The University of North Carolina at Chapel Hill regarding their athletic academic scandal. After an article quoted her that UNC Chapel Hill could face an additional investigation and possible sanctions after the NCAA concluded their investigation into the matter, Dr. Wheelan [wrote a letter](#) to the university stating that she had reviewed the NCAA’s report on the scandal and determined that no further investigation was necessary. She concluded the letter, “I’m sorry for any anxiety the article caused and look forward to seeing you in Dallas at the SACSCOC Annual Meeting” (Thomason, 2017). The very first standard of the SACSCOC Principles of Accreditation is solely about Integrity and states that “The institution operates with integrity in all matters” (SACSCOC, 2018, p.11). This same document further states that “the principle serves as the foundation of a relationship in which all parties agree to deal honestly and openly with their constituencies and with one another” (p.11). We believe it is inappropriate for an accrediting agency to cede its responsibility in this area to a different governing body, in this case, the NCAA. This is especially the case given the long-standing nature of the UNC-Chapel Hill scandal.

The UNC-Chapel Hill situation contradicts the SACSCOC approach to Edward Waters College, which was cited for integrity in 2004 and was removed from membership. The major difference between the two institutions is size and resources but the punishment levied by the accreditor was far more punitive against the smaller, less-resourced institution. While this sole instance is not conclusive, it could potentially indicate some level of bias in favor of large research universities, which SACSCOC sanctions at a much lower rate than HBCUs.

Dr. Wheelan’s quotes notwithstanding, the most suggestive evidence of bias can be found in the sanctions and special committees required of HBCUs as they proceed through the reaffirmation process. A review of both the [2017 SACSCOC Annual Report](#) and [2018 Accreditation Actions Statements](#) demonstrate a disproportionate negative impact against HBCUs. Seventy-seven (77) HBCUs are members of SACSCOC, comprising less than 10 percent of the association’s 794 members ([as of December 2018](#)). However, in 2017, 33 percent of the institutions sanctioned or continued on sanction were HBCUs and 30 percent of the special committees appointed were assigned to HBCUs. In 2018, 31 percent of the institutions sanctioned or continued on sanction were HBCUs and 44 percent of the special committees appointed were assigned to HBCUs (Table 1). In addition

to these recent sanctions against HBCUs, 43 percent (13 of 30 institutions) of all institutions dropped from SACSCOC membership in the previous 30 years were HBCUs (B. Wheelan correspondence to M. Lomax, 2019), which is a disproportionately higher rate than the nine percent of SACSCOC members that are HBCUs.

Table 1. SACSCOC Sanctions Against HBCUs, 2017-2018

	2017	2018
HBCU percentage of sanctioned institutions	33%	31%
HBCU percentage of special committees	30%	44%

According to the SACSCOC policy statement, special committees are authorized by the organization’s Board of Trustees or its President to “evaluate institutional circumstances that the Commission determines to be accreditation related, 2) judge whether the institution meets the requirements of the Principles of Accreditation in terms of the circumstances that prompted the authorization of the Special Committee visit and 3) determine continued compliance with the Principles, and/or to obtain information for the Commission.” These committees are automatically authorized to evaluate institutions on probation prior to the institution’s next scheduled review if they have not been visited within six months. However, the somewhat arbitrary nature of institutions on warning that are assigned special committees is not clearly justified on the SACSCOC website. The disproportionate percentage of HBCUs that have been assigned special committees over the last two years, many of which were on probation, merits further clarity from SACSCOC regarding the criteria for assigning these committees ([File of SACSCOC citations, 2016-2018](#)).

The percentage of HBCUs that comprise SACSCOC sanctions and special committees, and public comments from the accreditor’s leadership indicate some level of bias against HBCUs and similarly situated institutions. We also believe that weights should be applied to standards based on institutional size and available resources. The ability of Duke University to demonstrate financial stability is very different from that of Bennett College. Given the current application of standards, it appears that SACSCOC values a postsecondary system where wealthy institutions, which do not serve low-income students well, are given a pass when they run afoul of the standards and the institutions that serve large populations of our most vulnerable students are shepherded toward closure. We believe an education system where this is the case will not serve America well and recommend actions to address these institutional type biases. **Recommendation 6: SACSCOC should review internal processes and reaffirmation outcomes to determine if bias against small, low-resource institutions exist and if they conclude such, develop a weighting system for standards that take into account institutional resources, size and mission.**

Summary

Several recommendations were made in this review, the spirit of which are to advance the relationship between SACSCOC and HBCUs. Both entities are working to ensure that their students have high quality educational options available to them. The recommendations advanced to help achieve this are listed below:

- Create clear guidelines for peer definitions and peer assignments that take institutional type and mission into consideration.
- Conduct an independent third-party review of its processes, standards and policies investigating the presence of implicit bias against certain types of institutions
- Make all sanction data publicly available to allow for greater transparency about sanction decisions

- Establish clear guidelines for how institutions should present their financial stability based on institutional type and resources
- Conduct reliability testing of its standards to determine the extent to which they consistently measure an institution's quality compliance
- Review internal processes and reaffirmation outcomes to determine if bias against small, low-resource institutions exist and develop a weighting system for standards that take into account institutional resources, size and mission.

We acknowledge that the internal review by accrediting bodies encourages institutions to make important improvements to better meet acceptable quality levels. Our position is that the process, the review itself and the subsequent institutional improvement efforts can be improved and guided more effectively. In that spirit, there are two additional broad recommendations that SACSCOC should consider.

Recommendation 7: Institutions that resolve most of their sanction issues during the probation period should be given further time to resolve any remaining issues. The rationale behind this recommendation is that the probationary has served its purpose if, for example, an institution resolves four of its five sanction areas. This response by the institution demonstrates a good faith effort to improve its quality. Extending the probationary period for institutions that have tangibly demonstrated their ability to resolve quality issues would acknowledge their efforts and confirm that the accrediting agency is focused on maintaining quality higher education options available to students. It would also confirm that SACSCOC acknowledges the important place that HBCUs have in the higher education landscape.

Recommendation 8: HBCU leaders and faculty should increase their presence on the SACSCOC registry of reviewers and be tapped more often by the accreditor to serve. Our recommendations about defining, selecting and appointing appropriate peers can be better served by a more robust pool of peer candidates in the SACSCOC registry. HBCUs can do their part by having more of their presidents register as chairs and more senior administrators and faculty register to serve on committees.

There is a commonplace reference to the Hippocratic Oath stating, "First do no harm". While medical philosophers have academic debates on the meaning of this statement it is generally agreed that the treatment should have greater benefits than harm (Webster, 2017). It is our position that the accrediting agencies should acknowledge that, in some cases, their interventions have done more harm than good. Examples include the 2013 closure of St. Paul's College and Bennett College's recent removal from SACSCOC membership despite their ability to generate almost \$10m in donations in less than two months to respond to the accreditor's directive and strengthen the institution. Our belief is that their accountability enforcement role should not require accreditors to catastrophically harm an institution's ability to improve.

This paper outlines a list of concerns that should be addressed in a spirit of collaboration and transparency for the sake of students, the institutions they attend, accreditors and the entire American higher education system. We sincerely hope it is received with objectivity and a sense of shared improvement.

References

- Camera, L. (2015, Nov. 6). Education department beefs up accreditation. *U.S. News and World Report*. Retrieved from <https://www.usnews.com/news/articles/2015/11/06/education-department-beefs-up-accreditation>.
- Clement, R.E. (1966). The historical development of higher education for Negro Americans. *The Journal of Negro Education*, 35(4), 299-305.
- College Board (2015). *Test characteristics of the SAT®: Reliability, difficulty levels, completion rates*. Retrieved from: <https://secure-media.collegeboard.org/digitalServices/pdf/sat/sat-characteristics-reliability-difficulty-completion-rates-2015.pdf>.
- Creswell, J. W. (2014). *Research design: qualitative, quantitative, and mixed methods approaches*. 4th ed. Thousand Oaks, California: SAGE Publications.
- Donahoo, S., & Lee, W.Y. (2008). The adversity of diversity: Regional associations and the accreditation of minority-serving institutions. In M. Gasman, B. Baez, & C.S.V. Turner (Eds.), *Understanding minority-serving institutions* (pp. 292-310). Albany: State University of New York Press.
- Douglas-Gabriel, D. (2015, Oct. 23). A fight is brewing in Washington over college accreditors. *The Washington Post*. Retrieved from https://www.washingtonpost.com/news/grade-point/wp/2015/10/23/a-fight-is-brewing-in-washington-over-college-accreditors/?utm_term=.a61094a4362f.
- Edwards, A. (2018, July 26). Paul Quinn expands its urban work college model to Plano. *D Magazine*. Retrieved from <https://www.dmagazine.com/business-economy/2018/07/paul-quinn-expands-its-urban-work-college-model-to-plano/>.
- Jaschik, S. (2009, June 26). Paul Quinn loses accreditation. *Inside Higher Ed*. Retrieved from <https://www.insidehighered.com/news/2009/06/26/paul-quinn-loses-accreditation>
- Jones, L. (2019). Small, private HBCUs find lifeline with TRACS amid accreditation struggles. *Diverse: Issues in Higher Education*. Retrieved from <https://diverseeducation.com/article/142075/#.XJyyOYH6n5A.twitter>.
- Jones, W. A. (2013). Prestige among Black colleges: Examining the predictors of HBCU peer academic reputation. *Journal of African American Studies*, 17(2), 129-141.
- Kelderman, E. (2018, July 30). Issues of accreditation predominate in new rulemaking announced by Education department. *The Chronicle of Higher Education*. Retrieved from <https://www.chronicle.com/article/Issues-of-Accreditation/244097>

- Lederman, D. (2019, April 17). Harsh take on assessment... from assessment pros. *Inside Higher Ed*. Retrieved from <https://www.insidehighered.com/news/2019/04/17/advocates-student-learning-assessment-say-its-time-different-approach>.
- Lee, J.M., & Keys, S.W. (2013). *Repositioning HBCUs for the future: Access, success, research & innovation*. (APLU Office of Access and Success Discussion Paper 2013-01). Washington, DC: Association of Public and Land-grant Universities.
- Phillips, S.D., & Kinser, K. (2019, February 6). Accreditation: Where are we and how did we get here? *HigherEdJobs.org* Author in Residence online article. Retrieved from <https://www.higheredjobs.com/blog/postDisplay.cfm?post=1832&blog=24&Title=Accreditation%3A%20Where%20Are%20We%20and%20How%20Did%20We%20Get%20Here%3F>.
- SACSCOC. (Revised 2012). Policy statement on special committees. Retrieved from <http://www.sacscoc.org/documents/specialcommitteesrevised.pdf>.
- SACSCOC. (Revised 2018). *Resource manual for the principals of accreditation: foundations for quality enhancement*. Retrieved from: <http://www.sacscoc.org/pdf/2018%20POA%20Resource%20Manual.pdf>.
- Seltzer, R. (2018). Differing fates for 2 HBCUs in North Carolina. *Inside Higher Ed*. Retrieved from: <https://www.insidehighered.com/news/2018/12/14/why-bennett-college-losing-accreditation-while-st-augustines-university-keeping-it>
- Tabak, L.A., & Collins, F.S. (2011). Weaving a richer tapestry in biomedical science. *Science*, 333(6045), 940-941.
- Thomason, A. (2017). Accreditor apologizes for suggestion that UNC might be investigated again. *The Chronicle of Higher Education*. Retrieved from <https://www.chronicle.com/article/Accreditor-Apologizes-for/241771>.
- Trent, W.J. Jr. (1959). Private Negro colleges since the Gaines decision. *Journal of Educational Sociology*, 32(6), 267-274.
- U.S. Department of Education. (2018, December). *Rethinking higher education: Accreditation reform*. Retrieved from <https://www2.ed.gov/admins/finaid/accred/rethinking-higher-education-accreditation-reform.pdf>.
- Webster, L. (2017, December 10). The Tribune was wrong. Medicine often involves a risk to the patient. *The Salt Lake Tribune*. Retrieved from <https://www.sltrib.com/opinion/commentary/2017/12/10/commentary-the-tribune-was-wrong-medicine-often-involves-a-risk-to-the-patient/>.