
OBSTACLES TO CHANGE: OVERCOMING THE HURDLES OF THE STATE APPARATUS IN HIGHER EDUCATION

JAMIN HÜBNER

Abstract

The 2015 “Innovation and Leadership”—themed edition of *The Journal of Religious Leadership* makes clear that the survival and success of religious institutions largely depends upon institutions’ innovative ability to adapt in an ever-changing world. Although many obstacles to such change have been ably identified and addressed, significant challenges remain unaddressed. Perhaps the most notorious antagonist to institutional and religious change in the modern world—the state apparatus—is rendered largely invisible, if not simply dismissed from the discussion. This article builds upon the earlier work by Zscheile and O’Donnell-Long by drawing necessary attention to the state and its influence upon religious organizations, especially through accreditors in higher education. Leaders in churches and Christian higher-educational institutions will gain new perspective on the importance of decentralized institutional organization and practical insight regarding how to work within the limitations of existing models.

Introduction

In the Fall 2015 edition of *The Journal of Religious Leadership*, Dwight Zscheile and Michaela O’Donnell-Long forge various contours in the subject of institutional change in religious organizations. They offer sound advice and numerous directions for moving forward. Zscheile’s article “Disruptive Innovations and the Deinstitutionalization of Religion” lucidly outlines the narrative of the rise, fall, and somewhat disjointed recovery of institutional religion in twentieth and twenty-first century America, followed by an enlightening assessment of “disruptive innovations” research from the business world and its application to contemporary

religious organizations.¹ And in her fresh and hopeful article “Fostering Space for Creativity in Religious Organizations,” O’Donnell-Long highlights the primacy of “the ability to think and act creatively” in addressing “adaptive challenges” and uncertainty, a posture that is itself “from the creative nature of God.”²

Both of these articles cogently identify some of the key obstacles to change (e.g., tradition, economic factors, cultural fragmentation, and so on), both note the necessity of adaptability and an innovative spirit if religious institutions are to survive and thrive, and both connect an ethos of openness and creativity to part of the solution. Both, however—as well as the other articles in the *Journal*—tend to overlook the formidable challenges posed by government regulation.

This concern does not dismiss the power and influence of culture, language, interpretive frameworks, ritual, religion, geography, economics, or various ideological movements. It also does not dismiss or negate the entire concept of regulation or governance. However, given the role that governments and laws have played in the history of Western civilization and in the formation of religious institutions and organizations, it is difficult to overstate the importance and place of this well-known, age-old power that has been itself, for centuries and in various societies, a religious organization and institution. Indeed, serious discussion and proposals about change cannot take place without addressing the influential role that the state plays.

My goal for this article, then, is to revisit the general influence of the state apparatus on religious institutions, followed by a close examination of how government influence through higher education accreditation can (and

¹ He concludes: “The gifts of established faith communities must be claimed, translated, reinterpreted, and expressed in new organizational forms, or they will be lost as their present institutional bearers disintegrate.” Dwight Zscheile, “Disruptive Innovations and the Deinstitutionalization of Religion,” *The Journal of Religious Leadership* 14:2 (2015): 5–30.

² Michaela O’Donnell-Long, “Fostering Space for Creativity in Religious Organizations,” *The Journal of Religious Leadership* 14:2 (2015): 31–44.

often does) stifle positive, innovative change. During this discussion and following, I want to offer key insights as to what current Christian institutions can do to work within existing (and sometimes unchangeable) limitations.

Remembering Caesar

Sound guidance can occur only after properly unfolding the nature of the subject matter. In our case, this means carefully identifying the nature of government regulation in higher education and Christian institutions, along with the various limitations posed before innovative leaders.

An undeniable “stamp of authority” is found upon the face, operation, and identity of virtually all religious institutions and organizations that exist within an established nation. This recognition, involvement, and legal (coercive) authority influence the structure and function of an institution in various ways. This is true even for those entities that are typically viewed as uninvolved.

Churches in the United States and Canada, for example, have a substantial degree of separation from the workings of the state.³ They have tax-exempt status, which applies to property and the pay of staff. This legal recognition, however, is largely considered a privileged status, a status that is granted or authorized from central, government power. Further, it is not the church but rather the state that determines what qualifies as a “church” to begin with. For instance, the U.S. Internal Revenue Service (IRS) public Web site defines no fewer than fourteen criteria for what is considered a legal, tax-exempt church. What is noteworthy is not the potentially problematic nature of the criteria themselves (e.g., such as what qualifies as “ordination” and “distinct religious history”), but what is asserted in the paragraph immediately following it: “The IRS generally uses a combination of these characteristics, together with other facts and circumstances, to determine whether an

³ By “state apparatus,” I simply mean the entirety of tax-payer funded departments and organizations (e.g., Congress, the judiciary and the courts, armed forces and police, internal departments, agencies, and so on).

organization is considered a church for federal tax purposes.”⁴ With such explicit (and perhaps, unavoidable) disregard for principled, reasoned methodology, it is not possible for one to know if a religious institution will, for some reason and in some day in the future, become a nonchurch and fall under legal judgment. This has practical implications about the long-term planning undertaken by an institution’s leaders.

One should also note that it is the churches that must systematically, publicly, and empirically legitimize themselves before those who maintain a monopoly on force, not the other way around. Given the peaceful, virtuous function of (most) religious institutions and the inherently forceful function of the state, this is—despite its current popularity in the last few centuries—a precarious arrangement. The self-legitimizing status of the state has been taken for granted in the Western world,⁵ so much that it is largely beyond the imagination of contemporary society to conceive of alternative relationships. Churches annually demanding a 990 form from the IRS, proving that the department hasn’t deceived for monetary gain, would be unthinkable. But today’s atypical kinds of arrangements are hardly foreign to the Western world, where popes owned armies and those without the “right” theology were imprisoned, even executed. Plenty of room remains, then, for more critical discourse about the relationship between state and religious institutions.

Nonprofit organizations, also known by their 501(c)(3) status,⁶ are in a similar situation.⁷ In the United States,

⁴ United States Internal Revenue Service. “Churches’ Defined.” www.irs.gov/Charities-&-Non-Profits/Churches-&-Religious-Organizations/Churches--Defined (Accessed 2/21/2017).

⁵ The “right of kings” has traditionally been considered “divine,” after all.

⁶ Churches are not obligated to apply for 501(c)(3) status, but are recognized (“unofficially”?) by the government as such because of the nature of their operations.

⁷ U.S. Federal Regulation Title 2, Subtitle A, Chapter II, Part 200, Subpart A, §200.70, defines a nonprofit organization as an entity that “(a) Is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest; (b) Is not organized primarily for profit; and; (c) Uses net

nonprofits having an annual gross income of \$750,000 or more must (to avoid “fines or imprisonment”) pay a federally approved, licensed certified public accountant to conduct a financial audit.⁸ Full private audits might (in today’s currency valuation) cost up to and beyond \$15,000, which naturally becomes part of the nonprofit’s annual budget along with any other regular legal fees. For private Christian colleges, seminaries, and universities that want to be accredited, the gross-income threshold is irrelevant because accreditation requires regular financial audits as a matter of course.⁹ For startups and smaller institutions, the \$10,000 to \$15,000 annual audit expense can become a substantial burden, undermining the potential to initiate positive, innovative change.¹⁰ Additionally, churches often fund affiliated Christian schools as part of their annual budget—funds that might terminate in paying for the administrative, legal, and accreditation-related expenses of schools.

At this introductory level, then, it is readily apparent that (a) it takes effort and energy just to legally exist as a religious institution, and that (b) such legal requirements directly affect other spheres external to the religious institution in

proceeds to maintain, improve, or expand the operations of the organization.” U.S. Government Publishing Office. “Electronic Code of Federal Regulations.”

⁸ National Council of Nonprofits. “Federal Law Audit Requirements.” www.councilofnonprofits.org/nonprofit-audit-guide/federal-law-audit-requirements (accessed February 15, 2016). Individual states add their own requirements, varying (for example) from a \$300,000 income threshold (Pennsylvania) to \$2 million (California).

⁹ Within the accrediting standards of the only four faith-based accreditation agencies recognized by the Department of Education, see this requirement in *Accreditation Manual* (Forest, Va.: Transnational Association of Christian Colleges and Schools, 2013): 13.7, 17.4; *Standards of Accreditation* (Pittsburgh: The Association of Theological Schools, 2015), 8.2.2; *Institutional Accreditation Standards* (Orlando: The Association for Biblical Higher Education), condition 19. To my knowledge, the Association of Advanced Rabbinical and Talmudic Schools Accreditation Commission (AARTS) does not have their standards publicly available, but it would likely have the same requirement.

¹⁰ This does not include the cost of accreditation itself, which exists in the form of an annual fee.

question. As such, it is illusory to view government as a neutral or an uninvolved party in the basic functionality of religious institutions. Where there flies a national flag, Caesar is somewhere to be found.

Accreditors and Christian Higher Education

This reality is particularly evident in the role of accreditors in higher education.

Higher-education in the “developed” world,¹¹ whether religious or not, tends to be arranged to favor education that is validated by a government.¹² It is hardly necessary to demonstrate that the vast majority of schools of learning refuse to recognize the legitimacy of degrees that are not officially recognized by an agency that is also officially recognized by the state department of education.¹³ One of the purposes of accreditation is, after all, to eliminate (or at least discourage) those schools that are viewed as educationally inferior (e.g., “diploma mills”); any institution that wants to achieve public credibility would not associate with such inferior institutions.¹⁴ Because of these basic

¹¹ I put “developed” in quotes since, as many sociologists and cultural researches argue, what is considered “developed” is a subjective notion fraught with problems related to cultural values. (It is possible, for example, for a country to be religiously and ethically “developed” while remaining “economically undeveloped.” Western countries are, in my view, becoming increasingly disintegrated, or “undeveloped,” in terms of spiritual practice and cultivating meaningful religious traditions.)

¹² Goldie Blumenstyk, *American Higher Education in Crisis? What Everyone Needs to Know* (New York: Oxford University Press, 2015), 16: “...in reality [accreditation] is essential, because degrees and credits from unaccredited institutions are often not taken seriously by employers, licensing agencies, or other colleges, and because in the United States, federal and state student aid is only provided to students at institutions approved by recognized accreditation bodies.” Contrast with Derek Bok, *Higher Education in America* (Princeton, N.J.: Princeton University Press, 2015), 252: “accreditation is not essential” (at least in the context of business schools).

¹³ In the United States, this is the Department of Education (DOE).

¹⁴ There are obvious questions, of course, about whether it is necessary for a federal agency to declare that Harvard, Yale, and other universities (that have existed long before the DOE) are not diploma mills. On that note, diploma mills are always obscure by necessity, for it is impossible to gain large-scale

relationships, accreditors generally function as an arm of the state. For better or worse, “Accreditors are hugely powerful gatekeepers.”¹⁵

In recent times, regional accreditation has become something of a gold standard. In fact, educational institutions have enforced this benchmark on the credentials possessed by their faculty. A quarter-century ago, it was generally sufficient for a professor to have a graduate degree that was accredited by any accrediting agency recognized by the Department of Education (DOE). Today, those expectations have shifted to more specific requirements. Four of the five largest online universities in the United States require faculty to have a graduate degree from a “regionally accredited institution” that is “recognized by the U.S. Department of Education”¹⁶ (see Table 1¹⁷). In practical terms, this means that a professor who applies without possessing a degree from a regional accreditor will be automatically discounted for consideration.¹⁸ Similar things

prominence in educational fraud without risk of public exposure. It might make more sense to handle educational fraud like any other case of fraud—requiring the equivalent of “warning labels” or “disclaimers”—not on food products and consumer goods in this case, but on the Web sites and literature of schools and colleges (e.g., “Our institution does not have resident faculty...”).

¹⁵ Blumenstyk, *American Higher Education*, 116.

¹⁶ The irony is that the same institutions purport to support “diversity” without realizing that regional accreditation is a Western phenomenon—thereby excluding all faculty except those educated in the contemporary Western world. The type of hegemony that contemporary programs, policies, and procedures are aimed at reducing is thereby likely to increase instead. (This would be an excellent research project waiting to be published.)

¹⁷ The listing and ranking comes from *Collegestats.org*.

<http://collegestats.org/colleges/online/largest>. (accessed 2/21/2017). Each quote regarding requirements comes directly from faculty job descriptions on the institution’s Web site. I researched the same for the five largest public universities (Arizona State University, University of Central Florida, The Ohio State University, Florida International University, and Texas A&M) and, strangely, all but one (University of Central Florida) does not publicly identify the accreditation requirements of faculty education at all.

¹⁸ This raises questions about the shortage this might create in the pool of possible candidates. However, in the current environment in higher education, there is a surplus of faculty to choose from (largely due to the

have occurred in the transferability of credit from non-regional schools; in 2005, one study concluded that only “14 percent specified that they accepted national accreditation” as sufficient for transfers.¹⁹ In these ways and others, regional accreditors and their member institutions have monopolized the “accreditor market” (if such terms are legitimate).

TABLE 1

Institution	Faculty Education Requirement
University of Phoenix	“...from a regionally accredited U.S. institution or international equivalent in the subject you’d like to teach”
Ivy Tech Community College	“...from a regionally accredited institution”
American Public University System	“...from a CEPH accredited institution”; and in other cases: “...from a regionally accredited institution is required.”
Liberty University	“...from an accredited institution.”
Miami Dade University	“...from a regionally accredited institution.”

consolidation of courses under large, online hubs), so requiring regional accreditation from the pool of candidates is feasible. Whether or not these kinds of specific requirements remain within the ethical and/or official policies of the DOE is currently debated.

¹⁹ Government Accountability Office: Report to Congressional Requesters, “Postsecondary Institutions Could Promote More Consistent Consideration of Coursework by Not Basing Determinations on Accreditation” (October, 2005): 9. www.gao.gov/new.items/d0622.pdf. (accessed 2/21/2017). Cf. Doug Lederman, “Tussling Over Transfer Credit.” (accessed 2/21/2017). *Inside Higher Ed* (February 6, 2007). www.insidehighered.com/news/2007/02/26/transfer (accessed 2/21/2017), and, Government Accountability Office: Report to Congressional Requesters, “Postsecondary Institutions Could Promote More Consistent Consideration of Coursework by Not Basing Determinations on Accreditation” (October, 2005). www.gao.gov/new.items/d0622.pdf (accessed 2/21/2017).

Accrediting agencies in higher education are numerous and varied.²⁰ The U.S. DOE in 2016 listed sixty-three active accreditors—twelve regional accrediting agencies (six of which directly correspond to six geographical areas of the country), nine national accrediting agencies (four of which are faith-based), twenty-two “hybrid” accrediting agencies, and twenty “programmatic” accrediting agencies (which approve certain academic/professional programs within an institution).²¹ For the purposes of this article, my discussion will (when applicable) default to the standards of the three Christian accreditors²² and six regional accreditors.²³

Accrediting standards, like any assertive, written body of law, are not neutral with respect to basic assumptions in ethics, epistemology, religion, linguistics, and philosophy.²⁴ They are not created “out of vacuum.” As such, accrediting

²⁰ The first accrediting agencies in the United States appeared around the 1880s, becoming formalized in the early 1900s and regulated by the government in the 1960s. See “History of Accreditation,” *Accrediting Council for Independent Colleges and Schools* (ACICS) (2016). www.acics.org/accreditation/content.aspx?id=2258 (accessed 2/21/2017).

²¹ United States Department of Education. “The Database of Accredited Postsecondary Institutions and Programs: Agency List.” <http://ope.ed.gov/accreditation/Agencies.aspx> (accessed February 11, 2016).

²² Transnational Association of Christian College and Schools (TRACS); Association for Biblical Higher Education (ABHE); Association of Theological Schools (ATS).

²³ Middle States Commission on Higher Education (MSCHE); New England Association of Schools and Colleges (NEASC); Northwest Accreditation Commission (NWCCU); Southern Association of Colleges and Schools (SACS); Western Association of Schools and Colleges (WASC). The North Central Association of Colleges and Schools (NCA), dissolved in 2014 and being replaced by the Higher Learning Commission (HLC).

²⁴ For those who might wonder how accreditation standards embody religious values or assumptions in nonreligious circumstances, we must be reminded that a document devoid of all things theistic would be “functionally atheistic” in its religious orientation, which is obviously not “religiously neutral.” For more on this, see Roy Clouser, *The Myth of Religious Neutrality* (Notre Dame, Ind.: University of Notre Dame Press, 2005). Further, note how O’Donnell-Long contends that “human creativity is an act of participation—participation in God’s creative and redemptive activity in this world” (“Fostering Space,” 35). Institutions and structures (e.g., accreditors) that stifle creativity are thereby doing something inherently *theological*.

standards are the product of contemporary cultures and ideologies, whether that includes modern philosophy, empiricism, or elements of British Common Law. Many standards are relatively uncontroversial (like requiring an official name) while others lack critical justification (such as requiring certain hierarchical structures; see more on this below).

Accrediting standards are designed to do much more than weed out diploma mills.²⁵ They are meant to ensure institutional functionality by requiring clear organization, legal authority, public documentation—containing policies and procedures, accountability and integrity, qualified staff, a process of review and self-assessment, and financial stability.²⁶ The manuals (or handbooks) containing all of these standards differ according to agency in details, organization, format, and length, but they generally contain these same basic requirements.²⁷

Due to limited resources, human fallibility, and the notorious problem of interpreting the standards, there is no guarantee that any institution is always one hundred percent in compliance, even if an accrediting body officially declares this to be the case at a given point in time. This is especially true since comprehensive reviews occur in periods of five, seven, or ten years, giving institutions temporary room to flex in and out compliance without much notice.²⁸ It

²⁵ Bok, *Higher Education in America*, 70–71: “Accreditors are bringing pressure to bear through their periodic campus visits and their efforts not merely to disaccredit woefully weak institutions but to improve the performance of all universities they inspect.”

²⁶ Or, “Higher Education accreditation in the United States was developed ‘to protect public health and safety and to serve the public interest.’” This quote can be found in numerous publications, accreditor websites, and organization websites, but I have not been able to locate its original source.

²⁷ For example, in the faith-based agencies, the manual for ABHE is twenty-five pages; TRACS is seventy-six pages; ATS is 110 pages.

²⁸ Cf. Bok, *Higher Education in America*, 402, 404: “Many colleges have managed to remain in operation despite graduation rates that are egregiously low and records of employment for their graduates that fall well short of reasonable expectations.... Neither the past experience of accrediting agencies nor the record of efforts to uphold minimum standards for charter schools and other institutions in society gives much reason for optimism.”

generally tends to be difficult, however, to hide areas of noncompliance (especially given recent efforts designed to avert this very thing).²⁹

The standards also undergo periodic review according to changes in the industry, federal review, or internal suggestions by accreditors or member institutions. One of the most recent, substantial areas of change surrounds online education because it is becoming more and more of the default mode of learning. Such changes in regulation naturally lag behind changes in the industry. In some situations, it can take decades before standards catch up to institutional practices. This phenomenon reflects the parasitic nature of regulatory agencies, which (it must not be overlooked) depend on member institutions for their own financial well-being.³⁰ This lag can be an advantage if existing standards do not squelch the creativity of extant institutions; to ensure freedom, it makes sense that regulators allow the market to develop practices instead of dictating those practices to develop before they exist.

However, at certain times, standards prevent positive change from occurring in the first place. This is a serious concern that is overdue for visitation and appropriate response.

Accreditors as “Established Firms”

To gain a deeper understanding of the situation, it should be noted that the nature of accreditation agencies poses a problem—no different than “established firms” in the business world. Indeed, accreditors function remarkably similarly to the established firms discussed in Zscheile’s article on disruptive innovations.

The phrase *established firms* comes from Clayton Christensen’s book *The Innovator’s Dilemma*³¹ and refers to

²⁹ See Douglas Belkin, “Obama Steps Up Pressure on College Accreditors,” *The Wall Street Journal* (February 4, 2016).

³⁰ Annual fees are typically calculated by the size (enrollment) of the member institution.

³¹ Clayton Christensen, *The Innovator’s Dilemma* (New York: HarperBusiness, 2011). First published in 1997.

leading entities in the marketplace (in his case, businesses and corporations). Zscheile's contributive twist is that (much of) what is said of these firms can be said of religious institutions, as well. The upshot is that religious leaders can learn from Christensen's research.

In his survey of this work, Zscheile notes that established firms "have a good thing going and see little reason to jeopardize it."³² However, this attitude can adventitiously lead to failure, as "Established firms assume they already have the knowledge and expertise about what will work and need only apply it in new situations."³³

... it is precisely when they have achieved success that established firms become vulnerable to disruptors. Disruptors work with differing assumptions than established firms....Because established firms tend to be captive to their existing customers, they have little imagination, capacity, or organizational freedom to listen to those not currently part of their customer base and to allow them to serve those new customers. The very practices required to sustain the established firm prevent those firms from adapting and eventually lead to their demise.³⁴

For religious organizations, this means that:

Congregations are organized around clear, networked structures and roles. Rather than the fluid, networked structures of an emergent organization, performative zone congregations are hierarchical and formal. Professionalization dominates the approach to leadership. Communication and planning are formalized and centralized through official channels....[Given appropriate change] Most likely, religious communities will be leaner, more participatory, less bureaucratic, less expensive to sustain, and focused on core shared practices.³⁵

³² Zscheile, "Disruptive Innovations," 16.

³³ Zscheile, "Disruptive Innovations," 22.

³⁴ Zscheile, "Disruptive Innovations," 16–17.

³⁵ Zscheile, "Disruptive Innovations," 19, 27.

The attributes ascribed to established firms and traditional models of religious organizations almost perfectly describe the nature of accrediting agencies. In fact, these characteristics might be more accurately attributed to accreditors because of their government affiliation, which amplifies the aforementioned properties (e.g., centralization, top-down hierarchy, formalized planning, assumptions of adequate knowledge, little imagination, difficulty changing, communication through official channels, and so on). With literally trillions of dollars forcefully collected through taxes, the morass of bureaucracy and the extent to which regulators can subvert change, creativity, and innovation is almost unbounded.³⁶

Accreditation agencies publicly acknowledge these kinds of problems. To give only one example, consider the 2010 remarks by the president of the Council for Higher Education Accreditation (CHEA):

Accreditation is being transformed from a valued private-sector process—over which the federal government historically has exercised limited control—to a process that is subject to more and more federal involvement. The implications of this shift, profound for faculty members, can include the erosion of academic freedom and the loss of appropriate authority and responsibility for the key academic decisions that have defined the faculty role for centuries—that is, judgments about curriculum,

³⁶ Socialist, public-good, and collectivist readers will be quick to invert the argument, suggesting that the amount of good that can be achieved with such trillions of tax dollars is similarly unbounded; the state does good, not only bad. This is not a debate that can be taken up here. But as an initial response, I would point to (1) the involuntary—and therefore morally questionable nature—of collecting such funds for public education in the first place, and (2) the dubious success of the modern, public education model in the last two centuries—specifically with reference to the decrease in intellectual and educational rigor from models in the 1800s to those of the present day, in the perpetual “dumbing-down” of standardized tests in the last half-century, and in the failed correspondence between funding increases toward public schools and typical metrics of success (e.g., literacy rates, graduation rates, and so on).

academic standards, and general education. *The core academic values on which accreditation is built and in which faculty members invest are currently at risk as the government role expands.*³⁷

A Responsibility of Leaders: Putting Accreditors to the Test

If accreditors can legitimately be thought of as “established firms,” then perhaps Zscheile’s recommendations for progress also apply to accreditors. These would include the four items: “close listening to neighbors,” “iterative small experiments, or repeated attempts to connect the...community’s practices and traditions with the realities of these neighbors,” “high tolerance for failure,” and “improvisation, literally not seeing ahead.”³⁸

Some of these recommendations are more or less followed by accreditors.³⁹ However, the nature of modern accreditation seems to run fundamentally against them. (Just imagine a five-year Strategic Plan titled “Improvisation 2040: Not Seeing Ahead.”) This is more evident given Zscheile’s other suggestions, which include support for “design thinking” and “lean startup methodology.”⁴⁰ What do accreditors do to encourage such practices? At first glance, the answer is very little. Again, to be accredited, institutions—not accreditors—must bend, accommodate, and obey the accepted rules in order to become compliant. But, it just might be compliance that leads the institution toward unsustainability.⁴¹

³⁷ Judith Eaton, “Accreditation and the Federal Future of Higher Education,” *Academe* 96:5 (2010): 21–24. Emphasis mine.

³⁸ Zscheile, “Disruptive Innovations,” 23.

³⁹ For example, regarding (1) accreditors sometimes make changes to their standards based on what member institutions suggest; regarding (2), accreditors sometimes require the board to receive external input from all parties; regarding (3), accreditors allow for probationary and grace periods when member institutions fall out of compliance, and so on.

⁴⁰ Zscheile, “Disruptive Innovations,” 24–25.

⁴¹ Note, for example, in a recent study examining the assessment of theological education, particularly with relation to the 2014 United Kingdom

Compliance, in a word, is *conformity* to established norms. But what happens when the established norms undergo evolution? What happens when the world changes, as it always seems to do? This poses a dilemma, as the standards that used to determine the health of a college or university are now the standards that lead to its demise.

Whether or not this is the case, truly creative higher-educational organizations will not fit the typical accreditation box. “The creative process,” writes O’Donnell-Long, “is heuristic rather than algorithmic....Heuristic tasks, like adaptive challenges, are nonlinear and often do not have predictable outcomes.”⁴² Modern education, accreditation, and contemporary models of “self-assessment,” however, regularly default to math as the language of choice, with measurable outcomes, evidence-based practices, and quantifiable data representing the supreme form of knowledge. As such, these empirical methods are decreed as desirable (and required) for all member institutions to embrace.⁴³ Clearly, this approach is far more algorithmic than heuristic.

What is increasingly lost in this accreditation and self-assessment process is any sense of diversity and imagination. “Creativity might even be an antidote for organizational failure...,” says O’Donnell-Long.⁴⁴ This might be a polite way of rendering the colloquialism “adapt or die.” But if this is really the case (and at times, I think it is), accrediting

Research Excellence Framework (REF), where the author argues in favor of competency-based assessment and notes at one point that “many competencies are actually rooted in character traits and thus revive an ancient tradition of character education present since Paideia and *largely lost* through accreditation and academic captivity of theological education” (emphasis mine). See Marvin Oxenham, “A Critical Assessment of the Impact Agenda.” Presented at the C-15 International Council for Evangelical Theological Education (ICETE) consultation in Antalya, Turkey (November 10, 2015) in response to the conference theme “The Impact of Theological Education.”

⁴² O’Donnell Long, “Fostering Space,” 35.

⁴³ See, for example, TRACS, *Manual*, 2.2.A., 9.9.F, 11.4.A, 19.11; WASC, *Handbook*, III.B.C.1, 4.3; SACS, *Principles*, 3.3; NWCCU, *Standards*, 5.A.1; MSCHE, *Standards*, V.2; NEASC, *Standards*, 2.6, 8.5.

⁴⁴ O’Donnell-Long, “Fostering Space,” 33.

standards might well prove to be a death sentence, not flexible, eschatologically sensitive words of hope.

At the very least, this suggests that leaders of institutions ought to be actively familiar with the policies and procedures under which they are governed. This often involves hiring specific staff just to stay on top of such regulations. Despite the costs associated with such accommodations, it might prove less costly than accidentally crossing an unknown line down the road and then having to spend extra cash and time to remediate the situation.⁴⁵

Symptoms of a Larger Problem and Cultivating Leadership Transparency

Zscheile and O'Donnell-Long are dealing with a larger set of problems than poor policies or corrupt leaders, and these are problems that have been centuries in the making. Jürgen Moltmann explains in his recent volume, *The Living God and the Fullness of Life*:

The modern world began with the rise of the exact sciences. The sciences became exact through the “reduction of science to mathematics” (*reduction scientiae ad mathematicum*). The concern that guided perception was freedom from natural forces that were not understood, and the mastery over them. For Descartes, it was the concern to make the human

⁴⁵ One might also consider Zscheile's recommendations for “agile project management,” which “allows for significant modification along the way through learning loops, intensive collaboration, regular practices of debriefing (called *retrospectives*), and the flexibility to improvise throughout the project” (“Disruptive Innovations,” 25). In a free market of businesses, this might involve a quick change of positions, shifting basic goals of the institution, or drafting new policies that immediately come into effect. But to do this in higher education (as it currently stands) would require a potentially multiyear process involving extended permission from accreditors and internal constituents, a slew of evidence-based modifications, revisions to dozens of documents, and even potentially the loss of accreditation itself (depending on how severe the “collaboration” and “learning loops” are). Again, when it comes to sound advice and practical steps for change (e.g., “agile project management”), contemporary accreditors often do little more than get in the way, for it is in their nature to conserve and regulate, not morph and experiment.

being “the lord and possessor of nature”; for the devout Francis Bacon it was the restoration of the likeness to God by way of lordship over the earth (*dominum terrae*). How can power over nature be acquired through knowledge? Through the application of the old Roman method, *divide et impera*—“divide and rule.” If natural formations are split up into their individual parts, and one perceives how they are put together and function, they can be “dominated,” and a separate formation can be constructed from their individual parts. But has one thereby perceived the truth of nature, or merely overpowered it because it was weaker?⁴⁶

In a similar vein, institutional leaders and accreditors must inquire: By merely achieving compliance to existing standards, have institutions really achieved what they need to achieve? By collecting data and committing epistemological hegemonicide⁴⁷ (i.e., one privileges the numerically measurable and mathematical), has one thereby perceived the true state of affairs with regard to an institution’s health and mission, or merely capitulated to a modern world(view) that is virtually blind to those very things—and is further oblivious to the ineradicable power and necessity of “narrative knowledge”?⁴⁸ By obtaining “full compliance” and the coveted blessing of Caesar, has an organization truly proven itself sustainable and functional, or simply become masters of public projection, mechanical obedience, and academic magniloquence?

⁴⁶ Jürgen Moltmann, *The Living God and the Fullness of Life* (Louisville, Ky.: Westminster John Knox, 2015), 185.

⁴⁷ I owe this term to Professor Gregory Howard, a narrative therapist, who coined the word during a personal discussion we had in February 2016. Apparently, the term has been around since the 1980s and, ironically, was also used in the context of education; see James K. Okutsu, “Pedagogic ‘Hegemonicide’ and the Asian American Student,” *Amerasia Journal* 15(1) (1989): 233–42.

⁴⁸ Jean-François Lyotard, “Excerpts From *The Postmodern Condition: A Report on Knowledge*” in Joseph Natoli and Linda Hutcheon, eds., *A Postmodern Reader* (Albany: State of University New York Press, 1993), 71–90.

Moltmann picks up his thought later in the book to make a further point: “Dominating knowledge is directed towards *objects* and turns things into objects. Participatory knowledge is related to *subjects*, and creates community.”⁴⁹ It should be obvious which approach is encouraged by modern accreditation and which is encouraged by Zscheile, O’Donnell-Long, and others.

“...It is not up to leaders,” O’Donnell-Long writes, “to prescribe or dictate the creative processes, but instead to set the stage for creativity by managing a set of interwoven realities.”⁵⁰ Future solutions to thriving organizations, according to Zscheile, also involve *decentralization* and *organic* (not hierarchical), *emergent* (not decreed and linear) *self-organization* (not chain-of-command). These areas are now entire fields of study, and it is no surprise why.

The utopian promises of modernity—such as the effectiveness of top-down, centralized planning—have proven empty from one corner of history to the next. True, one cannot ignore the mechanized accomplishments of the Industrial Revolution, the architectural achievements embodied in the Eiffel Tower and the Brooklyn Bridge, or the efficacy of vaccines in the fight against disease. But one must also not forget the costs involved in what has been gained, much less forget the risks imposed by the processes of centralized control. The starvation of millions in the 1930s in Russia was the direct result of centrally controlling the national food supply.⁵¹ The simultaneous Great Depression in America was a grand experiment of a newly established central bank.⁵² The murderous communities of the same World War II and post-World War II period were the result of attempts to centrally control entire populations—even pave the way to build a new human race

⁴⁹ Moltmann, *The Living God*, 186.

⁵⁰ O’Donnell-Long, “Fostering Space,” 39.

⁵¹ See Richard Pipes, *A History of Communism* (New York: Modern Library, 2003).

⁵² See Murray Rothbard, *America’s Great Depression* (Auburn, Ala.: Ludwig Von Mises Institute, 2000) and *A History of Money and Banking in the United States* (Auburn, Ala.: Ludwig Von Mises Institute, 2002).

from a central blueprint. All of these efforts and their failures—along with so many more—were forged out a foundationalist epistemology, a centralized optimism of human authority and reason, and the totalizing, reductionistic, universal schemes of such worldviews as Marxism, Darwinism, and Freudianism. Since “God is dead” (Nietzsche), all that is left is power, greed, and the compulsions of consensus. Thus writes one Christian historian and philosopher:

We live now in the wake of the most monstrously violent century in human history, during which the secular order (on both the political right and the political left), freed from the authority of religion, showed itself willing to kill on an unprecedented scale and with an ease of conscience worse than merely depraved. If ever an age deserved to be thought an age of darkness, it is surely ours. One might almost be tempted to conclude that secular government is the one form of government that has shown itself too violent, capricious, and unprincipled to be trusted...Christian society certainly never fully purged itself of cruelty or violence; but it also never incubated evils comparable in ambition, range, systematic precision, or mercilessness to death camps, gulags, forced famines, or the extravagant brutality of modern warfare.⁵³

In stark contrast to the crucial features of the so-called “enlightenment,” some of the most fruitful and productive creations of human history are the result of *emergent, organic, self-organized, decentralized* efforts.⁵⁴ The Internet, Wikipedia, and cloud-computing are just three small—but revolutionary—examples. Orchestras without directors,⁵⁵

⁵³ David Bentley Hart, *Atheist Delusions* (New Haven, Conn.: Yale University Press, 2009), 105–106, 107.

⁵⁴ See Jamin Hübner, “A Concise Theory of Emergence,” *Faith and Thought* 57 (October 2015): 2–17.

⁵⁵ e.g., the Grammy Award–winning Orpheus Chamber Orchestra.

cars without drivers,⁵⁶ globalized market systems without “anyone in control”—all of this has challenged the traditional way of thinking. These, indeed, are “disruptive innovations” if ever there was such a thing.

In this new world, the old-style organizations are no longer able to tap into intrinsic motivation, self-respect, dignity, and curiosity, which cripples the organization’s ability to adopt a flexible learning posture toward these rapid societal changes. To remain vital, organizations need to enhance their ability to adapt and innovate by flattening their hierarchy, empowering people within peer-to-peer relationships, creating multidisciplinary teams that function across old departmental boundaries, and adopting a participative style of management.⁵⁷

Or, in Zscheile’s words, “This moment...calls for...organization forms that might bear little resemblance to predominant inherited models.”⁵⁸

Practically speaking, this suggests that leaders of institutions should be honest and open about their discontent with dominant models, especially with their immediate team. Discussion needs to occur about what external conformity is doing to an institution’s vision. It will be necessary to ask questions such as: How can these costs of conformity be reduced? How can we ensure that our team is transforming the institution from the inside out, not others from the outside in? It is this type of process that can plant seeds in others and build momentum over time, leading to systemic change—including at the government and regulatory level. (Put alternately, there are good reasons why great leaders are typically revolutionary in their thinking and actions.)

In this entire dialogue, one must avoid confusion as to what is really “old” or “traditional.” As many scholars have

⁵⁶ See Google Self-Driving Car Project. www.google.com/selfdrivingcar (accessed 2/21/2017).

⁵⁷ Jack Barensten, “Church Leadership as Adaptive Identity Construction in a Changing Social Context,” *The Journal of Religious Leadership* 14(2) (2015): 50.

⁵⁸ Zscheile, “Disruptive Innovations,” 27.

noted, decentralization and organic emergent systems are far older arrangements than the hierarchical, top-down models of Western civilization. Whether the birth of the solar system through simple attraction and repulsion, leaderless swarms of locusts and slime mold patterns,⁵⁹ ancient “unregulated” free markets of goods and services, or the New Testament church—the diverse, organic “Body” (1 Corinthians 12–14)⁶⁰ organized according to the various gifts of members and guided by a plurality of elders with equal power and authority (Philippians 1:1; 1 Timothy 3; James 5:15, and so on),⁶¹ one does not find the neatly defined triangle of power so vividly expressed in, say, the Roman Empire or in today’s corporate ladders.⁶²

All of this means that nonlinear, nonhierarchical (or at least “flattened”) structures of functionality should be thought of as the tried and true, not the way of the crown. This might well result in a complete revamping of an institution’s organization chart, among other things.

Organization in Accreditation: Anything But Neutral

It is unfortunate then, that the Western, modern model is precisely what higher educational institutions are required to follow—regardless of their efficacy, the institution’s particular needs, or religious orientation. The state apparatus has already decided in advance (sometimes before some

⁵⁹ Scott Camazine et al., *Self-Organization in Biological Systems* (Princeton, N.J.: Princeton University Press) 2001. Cf. David Boaz, ed., *The Libertarian Reader* (New York: Simon and Schuster, 1997), Part 4: “Spontaneous Order.”

⁶⁰ See Stanley Hauerwas, *Without Apology* (New York: Seabury books, 2013), 20; Walter Liefeld, “The Nature of Authority in the New Testament” in Rebecca Groothuis and Ronald Pierce, eds., *Discovering Biblical Equality* (Downers Grove, Ill.: InterVarsity Press, 2005), 264; Daniel Migliore, *Faith Seeking Understanding* (Grand Rapids, Mich.: William B. Eerdmans Publishing Co., 2014), 262–276; Thomas Oden, *Classic Christianity* (New York: HarperOne, 1992), 708–711.

⁶¹ See James R. White, “Sufficient as Established,” in Chad Brand and R. Stanton Norman, eds., *Perspectives on Church Government: Five Views on Church Polity* (Nashville, Tenn.: Broadman & Holman, 2004).

⁶² Cf. the essays in Mark Bedau and Paul Humphreys, eds., *Emergence: Contemporary Readings in Philosophy and Science* (Cambridge, Mass.: MIT Press, 2008).

institutions even exist) what higher educational institutions specifically need to survive and thrive. This puts Christian leaders in a precarious position.

Most accrediting standards enforce the same linear structures of authority (or governance): a legal board of owners and one (not two or more) chief executive officer (CEO; “president”),⁶³ underneath which is one (not two or more) chief academic officer (CAO) and one (not two or more) chief financial officer (CFO).⁶⁴ There are, of course, exceptions to this trend. The standards of ATS, for example, prudently refer to “chief administrative leadership” and, remarkably, never to a chief executive officer or president.⁶⁵ The standards of SACS address the CEO frequently, but specifically avoid speaking of the CAO in the singular, requiring instead that “The institution has qualified administrative and academic officers...”⁶⁶ Nevertheless, these are exceptions, not the rule. By and large, accreditors require educational institutions to mirror a monarchical, triangular hierarchy of authority.

Because some of the standards are difficult to interpret on this issue, I decided to directly contact the three faith-based and six regional accreditors to confirm. What if an institution wanted two CEOs, or two academic officers

⁶³ Note the use of the term (and its obvious correlation with the leader of the secular state). For centuries, the head of a university was known as a *rector*, *chancellor*, *principal*, and so on. The leader of Yale University was *rector* from 1701–1745. Thereafter, *president* became the default title. The use of the term *chief executive officer*” in higher education became popular in the mid- and late 1900s.

⁶⁴ See TRACS, *Manual*, 6.1–7.5, 17.6; ABHE, *Institutional Accrediting Standards*, Standard 4–5, 10; NEASC, *Standards*, 3.11–3.14, 7.11; HLC, *Assumed Practices*, D.6; NWCCU, *Standards*, 2.A.7–10; SACS, *Principals*, 2.3, 3.2.1, 3.2.11–12; WASC, *Handbook*, 3.10; III.A.3. Cf. “Statement on Government of Colleges and Universities,” formulated by the American Council on Education (ACE) and Association of Governing Boards of Universities and Colleges (AGB) and adopted by the American Association of University Professors (AAUP) in 1966.

⁶⁵ ATS, *Standards*, 7.1–7.34. Oddly, then, the ATS standards require a “chief library administrator” (4.4.1).

⁶⁶ *Principles*, SACS, 3.2.8.

instead of one?⁶⁷ In some cases, this would literally require nothing more than the addition of a single letter: “(s).” An institution might have a whole host of reasons for doing so, such as spreading responsibility and power or maintaining accountability. So I directly e-mailed accreditors two questions: Do your accrediting standards—and proper interpretation of them—allow for more than one CEO? Allow for more than one CAO? Table 2 below records a summary of the responses I received (or had to deduce from the standards when no meaningful reply was sent).⁶⁸

TABLE 2

Accreditor	More than one CEO allowed? More than one CAO allowed?
Association for Biblical Higher Education (ABHE)	No Yes
Association of Theological Schools (ATS)	Yes Yes
Higher Learning Commission (HLC)	No (Accreditor did not respond.) No (Accreditor did not respond.)
Middle States Commission on Higher Education (MSCHE)	No No
New England Association of Schools and Colleges (NEASC)	No No
Northwest Commission on Colleges and Universities (NWCCU)	No No
Southern Association of Colleges and Schools (SACS)	No (Accreditor did not respond.) Yes (Accreditor did not respond.)

⁶⁷ The same could go for CFO: What if an institution worked more effectively with three or four accountants on a team instead of requiring a single CFO to be in charge of all the money?

⁶⁸ In at least two cases, the responses I received from accreditors were difficult to interpret or exhibited a nonanswer.

Transnational Association of Christian Colleges and Schools (TRACS)	No No
Western Association of Schools and Colleges (WASC)	No (Accreditor did not respond.) No

As Table 2 shows, the vast majority are negative.

This is a serious problem (with practical implications), as well as an internal contradiction of philosophy. The reasoning behind a plurality of equal-voting board members is to (a) spread risk, (b) cultivate larger interest, (c) pool resources, and (d) achieve some degree of accountability. This is why it is rational to require a board (which is plural). But, for some reason, when it comes to the actual functionality of the institution, this well-reasoned methodology is outright defenestrated.⁶⁹ Caesar rears his head, and concentrations of power—in the form of one “chief” after another—effortlessly rise to their thrones.

This standard model of organization creates a whole host of problems, one of which is the notorious problem of communication between the board and the institution. The CEO is said, typically in institutional publications (e.g., Policy Manual, Board Manual, Faculty Handbook, and so on),⁷⁰ to be the official “channel” or “link” of communication between the institution and the board, and between the institution and the general public. “Good” CEOs, then, are naturally masters at manipulating information, revealing only certain facts about the institution to particular constituents.

Although these are the dynamics that have helped secure billions of dollars for institutions over time, they are also the dynamics that have led to the demise of countless

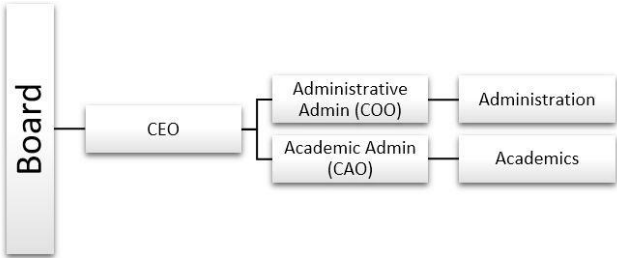
⁶⁹ The response from NEASC to my question about multiple CEOs or CAOs included a reply that read, “I can’t recall that the Commission has ever encountered an institution having two of any of those three positions. If it did, the Commission would want to learn more *to see if there was a problem?*” (emphasis mine).

⁷⁰ If one can get ahold of these documents, of course. Faculty and board manuals and handbooks are carefully protected documents that few institutions make available to the public.

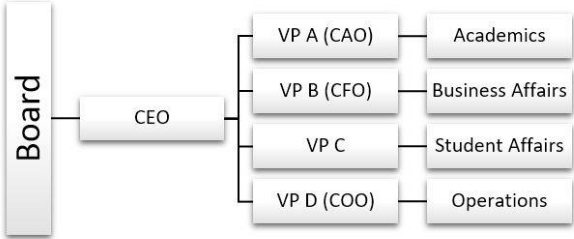
universities and colleges around the world. The board only receives good news until it is too late to respond to problems that had been brewing for years. The institution is also uninformed about what the owners of the institution intend for its long-term future, creating widespread doubt about purpose and vision.

It would make far more sense to “flatten”⁷¹ the hierarchy by adding links between the board and the institution. This would eradicate the needless monopoly of power and internal knowledge, and it would address many problems that are traditionally associated with that arrangement. As it will be argued below, it would be best if the presidency would be dissolved and replaced by an administrative council of equal-authority members (similar to the institution’s own board), containing perhaps two or three representatives that attend to the board, similar to how the board “chair” functions (see “Alternative Model B”). Disagreements are sorted out precisely in the same fashion as board disagreements (typically, a majority vote, or whatever the institution’s Board Manual or Handbook specifies). This is especially true as the presidency (as conceived today) is a rather recent invention in higher education and is anything but a tried and true model.

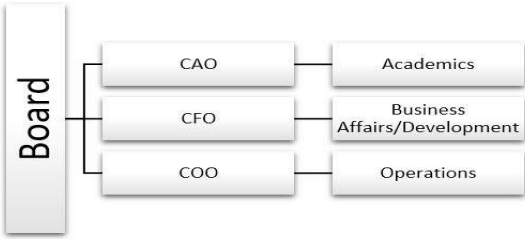
⁷¹ Cf. Barensten, “Church Leadership,” 50.



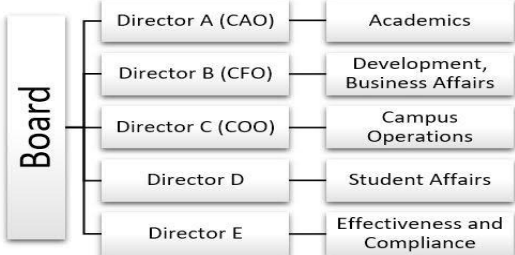
Traditional Model A (*Worse*)



Traditional Model B (*Bad*)



Alternative Model A (*Good*)



Alternative Model B (*Better*)

It will also become clearer that all of this is considered blasphemy to traditionalists in higher education and to the government.⁷² Organization is a sacred cow that cannot be questioned, and talking about it publicly is, to borrow language from *Downton Abbey*, “something not to be done.” This negative, knee-jerk reaction only goes to show how far we are from developing “organization forms that...bear little resemblance to predominant inherited models.”⁷³

But that is precisely what needs to be confronted by leaders (especially Christian leaders of institutions that seek honesty, creativity, and productivity). If contemporary accreditors truly encouraged productivity, creativity, institutional values, freedom, and long-term sustainability, they would only require identifiable organization and stated responsibilities, not a specific organization itself. Only the institution knows its most immediate needs and the truest means of meeting those needs. If an organization is not free to change shape on the most fundamental levels, it might not be free to do what is necessary to keep the organization alive, much less to function effectively.

A Collegiate Führer? Rethinking the Presidency

Without question, the most common of the three offices mentioned above is the CEO—an entity that might best be described as a vestige of British monarchy whose title became shamelessly commercialized in conformity with corporate America.⁷⁴

In many cases, accreditors (whether religious or not) place no substantial regulations specifically on the president, despite having (perhaps) the most direct and influential

⁷² I could tell in my interaction with accreditors that the whole idea of two CEOs or two CAOs was literally beyond their capacity to understand; in some cases, I had to restate the question several times and in different ways.

⁷³ Zscheile, “Disruptive Innovation,” 27.

⁷⁴ Blumenstyk does not comment or appear to notice the CEO nomenclature in her brief discussion of “corporatized” universities (*American Higher Education*, 121).

power over the institution (see Table 3).⁷⁵ If guidelines are included in the standards, they tend to be remarkably vague. It is as if accreditors assume that member institutions already know the president’s job (whatever that is), or it is assumed that a position is required and the person will simply fill in wherever a need arises. In that case, we are left wondering why the institution is presumed incapable of deciding what offices are necessary.

TABLE 3
Presidential Responsibilities and Qualifications

Accreditor	Stated <i>Responsibilities</i> for the President in Accrediting Standards Stated <i>Qualifications</i> for the President in Accrediting Standards
Association for Biblical Higher Education (ABHE)	Responsibilities: “...to provide administrative leadership for the institution.” (4.13) “...whose primary employment/vocational responsibility is to the institution and who is responsible to the board in leading the institution toward the accomplishment of its mission.” (5.1) Qualifications: <i>None specifically stated.</i> “...with the combination of academic background and professional experience appropriate to the institution’s mission.” (5.2)
Association of Theological Schools (ATS)	Responsibilities: None specifically for president but contain many for “leadership” in general. Qualifications: None specifically for president but contain many for “leadership” in general.
Higher Learning Commission (HLC)	Responsibilities: <i>None specifically stated.</i> “...chief executive officer...with appropriate credentials and experience and sufficient focus on the institution to ensure appropriate leadership and oversight.” (<i>Assumed Practices</i> , D.6.) Qualifications: <i>None specifically stated.</i> (cf. above)

⁷⁵ Keep in mind that although many standards do not list any specific responsibilities for the presidential office, some duties are assigned to the president throughout various corners of the standards (e.g., signing certain forms, being consulted during committees, being present for certain meetings, being appointed by the board, and so on).

<p>Middle States Commission on Higher Education (MSCHE)</p>	<p>Responsibilities: “reports to the governing body...[responsible for] developing and implementing institutional plans, staffing the organization, identifying and allocating resources, and directing the institution toward attaining the goals and objectives set forth in its mission... and is responsible for establishing procedures for assessing the organization’s efficiency and effectiveness” (VII.3.c and d.).</p> <p>Qualifications: <i>None specifically stated.</i> “has appropriate credentials and professional experience consistent with the mission of the organization.” (VII.3.b)</p>
<p>New England Association of Schools and Colleges (NEASC)</p>	<p>Responsibilities: “...whose full-time or major responsibility is to the institution...to manage the institution compatible with the board’s intentions and the institution’s mission...manages and allocates resources in keeping with institutional purposes and objectives and assesses the effectiveness of the institution...assures that the institution employs faculty and staff sufficient in role, number, and qualifications appropriate to the institution’s mission, size, and scope...consult with faculty, students, other administrators, and staff, and are appropriately responsive to their concerns, needs, and initiatives.” (3.10; 3.11; 3.12; 3.13)</p> <p>Qualifications: <i>None specifically stated.</i></p>
<p>Northwest Commission on Colleges and Universities (NWCCU)</p>	<p>Responsibilities: “...who is accountable for the operation of the institution.” (2.A.7)</p> <p>Qualifications: <i>None specifically stated.</i> “The institution employs an appropriately qualified chief executive officer with full-time responsibility to the institution.” (2.A.10)</p>
<p>Southern Association of Colleges and Schools (SACS)</p>	<p>Responsibilities: “...has ultimate responsibility for, and exercises appropriate administrative and fiscal control over, the institution’s intercollegiate sports program.” (3.2.11)</p> <p>“...controls the institution’s fundraising activities.” (3.2.12; cf. 3.2.13)</p> <p>Qualifications: <i>None specifically stated.</i></p>

<p>Transnational Association of Christian Colleges and Schools (TRACS)</p>	<p>Responsibilities: <i>None specifically stated:</i> “...whose job responsibilities are specifically spelled out in a board approved job description; whose primary professional employment is with the institution; who devotes substantially all working time during the contracted period to the specified job responsibilities; and whose outside professional activities do not detract from the specified job responsibilities.” (“Definitions”)</p> <p>Qualifications: <i>None specifically stated</i> (except for having accredited “degrees”): “...whose possesses [<i>sic</i>] the professional experience and competence for the assigned position, whose earned degrees from accredited institutions are appropriate to the assigned responsibilities; whose salary is fixed and not contingent.” (Definitions”)</p>
<p>Western Association of Schools and Colleges (WASC)</p>	<p>Responsibilities: <i>None specifically stated.</i></p> <p>Qualifications: <i>None specifically stated.</i></p>

As seen in Table 3, accreditors also typically lack specific, stated qualifications for the institution’s CEO. More surprisingly, some standards do not even require that the CEO has *any* credentials or qualifications at all. In those cases, anyone the board approves can function as the CEO (a person whose attributes are apparently above and beyond earthly description). It is no wonder Michael Cohen and James March remarked, “the college president is an executive who does not know exactly what he should be doing...”⁷⁶ The situation becomes more incredible when we realize that the eligibility requirements of part-time professors always exceed those of the president within the same documents—in regional standards and otherwise.⁷⁷

⁷⁶ Cited in Bok, *Higher Education in America*, 47.

⁷⁷ For the sake of brevity, I have not included a table with the requirements for faculty. But it is indisputable that faculty requirements are more specific and numerous than those for the president.

How can this state of affairs possibly be rationalized? Should not the office with the most power be the most guarded against abuse? Evidently not. It is simply assumed that the board is wise enough to choose a CEO who will not abuse power, so stated credentials and qualifications specific to the president are not even required.

This entire arrangement poses another case of incoherence, for it is the president's responsibility to choose and secure qualified faculty. (Or is it? Refer to Table 3 above). Why is it generally assumed that the board has the competence to select a qualified president (thus, the CEO office lacks stated eligibility requirements) but the president does not have the competence to select qualified faculty (thus, the faculty office has stated eligibility requirements)? If the president were truly as competent as accreditation requires, there would be no need to list the detailed credentials faculty must have, for the president would simply choose such a qualified person—just as the board (supposedly) chose a qualified CEO. Built into accreditation standards, then, is the hidden, paradoxical assertion that the president is too incompetent to choose the institution's backbone (faculty) and yet competent enough to oversee the entire institution (and in some explicit cases, fund the entire institution).⁷⁸ One can only imagine the kind of long-term chaos and instability created by this kind of organizational structure.⁷⁹

Placed in the larger American context, this paradox is hardly a surprise. The eligibility requirements for a substitute teacher in public schools exceeds, several times over in number and in rigor, those of the U.S. president. A minimum-wage job typically requires the minimum of a drug test, background check, personal references, and multiple forms of identification, but the official (constitutional)

⁷⁸ See SACS, *Principles*, 3.2.12. Cf. Bok, *Higher Education in America*, 48.

⁷⁹ Then again, perhaps no imagination is necessary and one simply needs to read the news. Whatever the case, according to one study, fewer than half of presidents of private universities/colleges “strongly agreed they were confident their institution was well-governed.” See Blumenstyk, *American Higher Education*, 101.

requirements to become the president of perhaps the most powerful country in the world are this: he or she must be thirty-five years of age and be a native citizen with ten years residence.⁸⁰ Being that accreditors adopt standards approved by the federal government, it is only natural that accreditors enforce a similar (and equally irrational) standard.

Even more disturbingly, accrediting standards typically do not require that the institution evaluate the president. This is a true quandary, because the biggest and most overwhelming aspect of accreditation tends to be self-assessment (or *effectiveness*, *internal evaluation*, and so on), and standards typically require “every aspect” of the institution to be evaluated.⁸¹ One would think that the CEO would be the first person to be evaluated by the institution. Instead, she or he is exempt altogether.

This is not to suggest that the president is never evaluated at all. The board is usually required to evaluate the president in accrediting standards.⁸² But, because of reasons already observed, this is more or less a faux evaluation.⁸³ The board has only one CEO, who they listen to by default.⁸⁴

⁸⁰ See Article II, Section 1 of the U.S. Constitution.

⁸¹ Despite this fact, and despite my criticisms of certain accrediting standards, I do believe that self-assessment is perhaps the most useful and important aspect that accreditors enforce. It is also a Christian idea—transparent feedback, accountability, and communication within community. As I have lamented with other higher-educational administrators responsible for accreditation, churches would function remarkably better if they implemented even the simplest mechanisms of feedback and evaluation. But, this is another journal article for another time.

⁸² See TRACS, *Manual*, 6.8; ABHE, *Standards*, 4.13; ATS, *Standards*, 7:3.1–2; WASC, *Handbook*, 3.9; SACS, *Principles*, 3.2.1; NWCCU, *Standards*, 2.A.7; MSCHE, *Standards*, VII.1.f; NEASC, *Standards*, 3.10.

⁸³ Should space have allowed, I would have liked to outline the remarkable incoherences in institutional policies and accrediting standards regarding the *ex officio* relationship of the presidential office and the board. Suffice to say, it is usually one of those key areas that accreditation half-heartedly delineates, creating plenty of room for misunderstanding and dysfunctionality.

⁸⁴ I know of at least one reputable and high-ranking Christian institution that explicitly forbids faculty members from talking to board members about the institution (during the term of their employment). I think this extreme policy is rare, but the spirit of the policy is rather common in higher education.

Yet, it is the institution that would know better than the board if the president has violated any policies precisely because they are the ones who are required to carry out the imperatives of the president. When presidents go bad (and they *do* go bad), the board usually discovers this by the institution, not the president. Thus, once again, accrediting standards regarding organization not only fail to accomplish what they are supposed to do, but they perpetuate some of the most elementary of problems.

Thinking (Un)Critically About Institutional Organization

With such endless problems in higher education that are related to organization, basic processes, and theoretically problematic accrediting standards, one would think this is an essential topic of discussion. One might also think that questioning “predominant inherited models” (Zscheile) would be central to the discussion, at least in major publications on the subject.

This is anything but the case. In Goldie Blumenstyk’s *American Higher Education in Crisis?* no substantial questions are raised about the viability of the current (and historical) hierarchical arrangement of educational institutions. In fact, readers might come away from relevant portions of the volume worried about how to fill (not reconsider) such offices as the CEO. In talking about presidents, she says, “...some observers worry that higher education will soon be facing a leadership vacuum just as the challenges of running a college are growing increasingly complex.”⁸⁵

In the assessment of two-time Harvard President Derek Bok, we are given similar cause for alarm:

...universities...are bound to become increasingly complicated and difficult to manage. This trend creates a dilemma for those entrusted with selecting presidents, provosts, and deans. On the one hand, universities need leaders with the management ability and fund-raising skills to keep such a vast and variegated enterprise running smoothly. On the other,

⁸⁵ Blumenstyk, *American Higher Education*, 106.

in order to appoint leaders who command the respect of the faculty and have the knowledge and experience to guide an academic institution, search committees need to select individuals with a solid record as a teacher and scholar. Yet candidates who possess both of these qualities may prove to be in short supply....there is a danger that trustees will end up choosing candidates who are markedly deficient in one respect or the other, thus threatening to create serious problems for their institutions.⁸⁶

After recounting the glory days of “legendary” presidents in a later chapter, Bok again opines the difficulties of the presidential office. Like the quote above, the question of whether the CEO office might have run its course is not even considered. Additionally, virtually no talk or discussion takes place about creative change or innovation (certainly not *disruptive* innovation).

Predictably, Bok’s lament includes not the problems caused by concentrations of power, but rather the lack of such power:

University presidents now face difficulties of a kind unknown to the legendary figures of yesteryear. They have far less power than their predecessors....The duties of presidents have expanded accordingly. They are often expected not only to develop a vision for the university and persuade the faculty to accept it, but to raise huge sums of money; organize and supervise a staff that often runs to thousands of people; represent the institution before alumni, legislators, government agencies, and local officials; preside and speak at numerous ceremonial events; and resolve a never-ending cycle of crises great and small that crop up every year.⁸⁷

Aside from the crisis of a legendary-president shortage, this daring new environment poses all kinds of paradoxes, such as the following:

⁸⁶ Bok, *Higher Education in America*, 26.

⁸⁷ Bok, *Higher Education in America*, 48.

...presidents today tend to delegate most of the responsibility over academic affairs to provosts and deans. The result is paradoxical. Presidents are chosen from the ranks of teachers and scholars in order to provide intellectual leadership and gain the confidence and respect of the faculty. In actual practice, however, they have less and less time to spend on matters of education and research but must devote almost all of their attention to financial, administrative, and ceremonial tasks for which their past academic experiences has [sic] scarcely prepared them.⁸⁸

In reading all of these concerns, one cannot help but think of pastor burnout in Christian churches. Countless congregations are organized with the expectation that the senior pastor (singular) will offer all of the gifts mentioned in the New Testament. This is, after all, what she or he is (allegedly) getting paid to do. But because no person actually has all of those talents and gifts, (a) the pastor must essentially pretend to have them (favoring pastoral candidates that tend toward being either dishonest or overconfident) and, just as negative, (b) the pastor will inevitably experience fatigue, causing the notorious burnout so common in contemporary congregations. This producer-consumer model is deeply rooted into American consciousness such that it is rarely questioned. This is true even though it continually causes problems and functions as the inverse of the explicit model provided in the New Testament (the organic, gift-oriented Body of 1 Corinthians 12:7–31; cf. Romans 12:3–8; Acts 11:29; Ephesians 4:1–14; Hebrews 2:2–4, and so on). Christians apparently need reminding: only Christ is the cornerstone and “head” of the church. It is true that one could point the finger at the growing challenges faced by today’s pastors (transgenderism and homosexuality, economic crises, racism, sexism, and so on), but this would ignore the real problem: the pastoral office itself as conceived.

⁸⁸ Bok, *Higher Education in America*, 49.

As we observed above, the same is true with the CEO in higher education. The office is the problem, not the one who fills it. A concentration of power is the problem, not the lack of power. Uncritical hierarchy is the problem, not the lack thereof.

Painfully, when the time comes for Bok to offer some kind of solution or way forward (under the subtitle “Are More Fundamental Reforms Needed?”), he immediately dismisses the possibility that fundamental organization has anything to do with it. Because of “evidence to date” and proof that faculty voices are heard more than is alleged, “there is no compelling reason to suppose that our basic system of governance is in need of fundamental change...”⁸⁹ The president-institution relationship is not touched, and at no turn in his discussion do the fundamental hierarchies of higher education—those universally required by accreditation—come into question.

Bok’s arguments are downright baffling at times. Readers are told that “In a system as competitive, as decentralized, and as free from hierarchical control as that of American higher education, one may wonder why the entire enterprise does not sink into anarchy and confusion.”⁹⁰ In comparison to Europe and socialist countries, one might make some sense of this statement. But for anyone who has been seriously involved with accreditation in the United States on any level at all, it is hard to read a comment like this with any degree of seriousness. Higher education might be an organizational mess, but it is anything but anarchy.

Similar disconnects appear when Bok laments traditional university organization:

The very nature of higher education, together with the size and complexity of its universities, suggests a final potential weakness. Will it be possible to govern such institutions effectively? Unlike corporations, military organizations, and government agencies, universities cannot be guided and controlled

⁸⁹ Bok, *Higher Education in America*, 69.

⁹⁰ Bok, *Higher Education in America*, 72.

hierarchically. No academic leader ever improved the quality of education by commanding the faculty to give better lectures, nor was a university's reputation for research ever enhanced by ordering professors to write better books. Improving the performance of the university necessarily demands the willing participation and cooperation of the faculty, while first-rate teaching and research require that individual professors have wide freedom and independence to proceed as they think best. As a result, universities, by their very nature of the work they do, are perforce rather anarchic institutions. Under these conditions, the risks of conflict, stalemate, and inertia are likely to be greater than they are in many other kinds of prominent organizations. The difficulties and complications just described reveal how our system of higher education, despite its impressive strengths, harbors tensions and weaknesses that could keep it from becoming all that society needs and expects.⁹¹

Bok begins by lamenting how universities are not as hierarchical as the military, government, and corporations—harkening back to his comment (above) on today's lack of presidential power. The assertion is that if universities were organized with a strict, hierarchical, chain-of-command structure, then something could get done. Orders would be given, and results would come to pass. Not having this power of command is, as he frames the discussion, an inherent weakness. His support for this assertion—or, at least what immediately follows it—is that this never happens in academia. Instead, it requires “willing participation and cooperation,” along with “freedom and independence” of research. This means that universities are inherently “anarchic institutions.” All of these “tensions and weaknesses” keep institutions of learning from reaching their potential.

⁹¹ Bok, *Higher Education in America*, 26–27.

All of these premises are problematic. Additionally, the conclusions stated at the beginning and end of the paragraph are not logically entailed by the reasons given.

First, as it has already been argued, it is *not* desirable for institutions of learning to become more like the government and military. Promoting, validating, and envying systems of coercion and hierarchy is precisely the approach we should not have—especially for Christian leaders living in the New Covenant era.

Second, universities *are* organized hierarchically. Bok's assertion that American universities are essentially anarchic is so uncritical, casual, and baffling that it borders on the absurd. If institutions with explicitly triangular organization charts, numerous "chiefs" overseen by a single "Chief" who is overseen by a (legal) board, and governed by literally thousands of state, federal, and accreditation regulations—if all of this is an example of an anarchic institution, I shudder to imagine the character of Bok's repudiation toward open access journals, institutionless MOOCs, and the concept of democracy in general (perhaps also another anarchic institution). One simply cannot locate any concept of *anarchy* or *anarchic*—except in perhaps the extreme comparison of communist-like models of Soviet-style education—where these terms could be interpreted in a meaningful sense.

Third, a bit of illogic is found in the following construction: "Unlike corporations, military organizations, and government agencies, universities cannot be guided and controlled hierarchically. No academic leader ever improved the quality of education by commanding the faculty to give better lectures..." That no academic leader has improved quality education (by any means) is not evidence that "universities cannot be guided and controlled hierarchically." Some of the examples provided *are* explicitly undertaken by presidents and administrators—such as telling faculty to write better books and give better lectures. The way administration and academic deans communicate this to faculty might not be through a phone call or an e-mail saying "write better books" and "give better lectures," but rather through policy, peer pressure, political maneuvers,

assessment benchmarks, and other means. Instead of saying “no academic leader” has done such things, perhaps Bok should have said “nobody in my experience” or “no one at Harvard” has done such things.

Conclusion

It is finally time to draw this study to a close. A handful of summaries are in order, along with suggested responses.

Situation: The state apparatus always has some effect on religious institutions and organizations, no matter the kind of government system. Governments regulate and control institutions of learning—private, religious, public, and so on—through approved accrediting agencies. As powerful gatekeepers, accreditors seek to discourage inferior institutions of learning and ensure basic levels of functionality for member institutions. Accreditation is achieved by paying for membership and (empirically) conforming to accrediting standards, which are not neutral, can be interpreted in various ways, and differ in details between accreditors.

Response: Leaders (e.g., seminary deans, school principals, and so on) need to be reminded of these effects and think critically about these dynamics as they seek to build up and rejuvenate their workplace. “What are these regulations doing to our vision, and how can we mitigate them?” is a key question to ask. Additionally, leaders need to vocalize their discontent with extant models by directly contacting the accrediting commissions (and DOE) with complaints about standards and how they limit creativity.⁹² Standards *do* change, and some accreditors *do* listen to their member institutions.

Situation: Accrediting standards require a certain model(s) of organization, which can be potentially harmful to institutions, especially models that require specific concentrations of power, lack state qualifications for offices, and require a rigid triangular structure of authority. As such,

⁹² Note that it is not enough, as some accreditors have done, to simply include such phrases as “implements innovative delivery methods.”

standards require too much specificity in areas that need generality (e.g., required offices, the number of offices, hierarchical structures, and so on) and lack specificity where there ought to be specificity (e.g., CEO qualifications, evaluation by institution, and so on). The wise counsel of those who see the need for positive, innovative change in religious organizations and business institutions is, regrettably, directly challenged by today's accrediting standards.

Response: Leaders must do everything possible to flatten the org chart and eliminate needless layers of authority and communication. For those in higher positions of leadership, expect others on the same level of power/authority to work out important matters themselves (e.g., on the basis of which party has the stronger convictions/persuasion) instead of simply promoting one person over another.

Situation: An institution or organization has a single CEO. Such a concentration of power creates a host of problems.

Response: As we learned, monarchy in higher education is as essential as monarchy in national government. Some countries do well when ruled by a king. In other countries, kings are oppressive and things would be much better without them.⁹³ Still in others, kingship is an unnecessary accessory, an emblematic icon of a bygone era. The same is true for colleges and universities, religious and otherwise. College presidents can be so essential to an institution that when they leave, the institution collapses (cf. Collins's "king and a thousand servants" model).⁹⁴ Or, they can be oppressive tyrants. Or, like in countless institutions across the world today, higher-education CEOs are title-holders who exist for no other reason than to satisfy the (often) inane, archaic ceremonies of accreditation. (Arguments to the contrary typically resemble those from more than two

⁹³ Similar things can be said of democracy, which apparently works much better in the West than in the Middle East.

⁹⁴ Jim Collins, *Good to Great* (New York: Collins, 2001).

thousand years ago when Rome threw out its kings, and such arguments need not be examined here.)

In the end, institutions should be free to organize their institution in whatever way they see as effective. In those cases, single CEOs should be intentionally avoided—for the same reasons that plural boards are established. If institutions do not have this luxury because of regulation, leaders (especially Christians, whose King died as a servant and was known for empowering slaves and peasants) should require that a specific section in their policy manuals lay out clear expectations of the president's function and, most importantly, limitations of power. Additionally, procedures should be clearly stated that allow those under the CEO to anonymously contact board members should a serious breach in policy occur. Policies are only as good as their enforcement, and one should assume enforcement will fail and provide additional options.

Post-Script

I realize some of the authors I have cited in support of my argument might not have made the same argument themselves if given the chance; some might even find my application of Zscheile and O'Donnell-Long's insights to accreditation distasteful. That's simply a risk I'm willing to take, and hopefully no one has been misrepresented.

Another note is that my argument is focused on certain accrediting standards that need severe improvement, not on standards that appear to function well (which do exist). Aside from the suggestion that institutions should be required to assess their own CEO (at least to be consistent), I believe accrediting standards on assessment and effectiveness—as well as academics—are, as a whole, more than adequate for their purpose. Whether or not institutions function more effectively when overseen by accreditors in comparison to working in a more free market model is an open question.

Jamin Hübner is director of institutional effectiveness, John Witherspoon College, Rapid City, South Dakota.