

Council for
Higher Education
Accreditation

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October 6, 2002

Ms. Wendy Macias
U.S. Department of Education
P.O. Box 33076
Washington D.C. 20033-3076

Dear Ms. Macias:

The Council for Higher Education Accreditation (CHEA) appreciates the opportunity to provide comments on the negotiated rule-making process and, in particular, the 12-hour rule. We were pleased to participate in the process and hope that CHEA may be a full team member in future sessions.

For the record, we would like to reiterate our position on the 12-hour rule and the shift to a “one-day” rule in the proposed regulations. As we stated during negotiated rulemaking discussions, we would prefer to address this issue in the broader context of reauthorization of the Higher Education Act, but can support the regulation as currently proposed, provided that appropriate steps are taken to assure the quality of higher education.

The 17 accrediting organizations that review institutions offering distance learning have standards, policies and procedures in place for the scrutiny of these offerings. However, because of the complexity of the regulations and statutory provisions governing distance education, it is difficult to assess the precise impact that this proposed change in the 12-hour rule will have on accrediting organizations and the institutions they accredit. In particular, we are concerned how the proposed regulations will affect the Department of Education’s recognition review for accrediting organizations and what, if any, additional obligations accreditation would have under these proposed rules.

Finally, it would be helpful for the Department to clarify language in the preamble which states that accrediting organizations are aware of the “new program formats.” Non standard term programs are not new to higher education or to accreditation review. If the comment was meant to convey the negotiations that took place when we discussed how accrediting organizations have standards in place to review distance learning, this comment does not fully reflect that discussion and does need to be clarified or omitted.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Judith S. Eaton', with a long horizontal flourish extending to the right.

Judith S. Eaton
President