

28 February 2003

Jeffrey R. Andrade
Deputy Assistant Secretary for Policy,
Planning and Innovation
Office of Postsecondary Education
1990 K Street, NW
Room 8046
Washington, DC 20006

Attention: HEA Reauthorization

Dear Mr. Andrade:

In response to the call for public comment on the reauthorization of the Higher Education Act (HEA) published in the December 20, 2002 Federal Register, the Council for Higher Education Accreditation (CHEA) offers the following preliminary comments and suggestions. This is one of several submissions that CHEA will be making to the United States Department of Education (USDE) and the Congress as we approach reauthorization.

CHEA is the national coordinating organization for regional, national, and specialized accreditation in the U.S. The CHEA Board of Directors is currently developing a CHEA reauthorization agenda - identification of those issues pertinent to accreditation as we undertake revisions of HEA. To date, these discussions have focused on four topics: accreditation and accountability, accreditation and distance learning, accreditation and transfer of credit and the accreditation-federal government relationship.

Our comments and suggestions here focus on accreditation and accountability in relation to the Department's goals of enhancing quality and strengthening accountability. These comments do not call for changes in the law, but are intended to inform deliberations about the role of accrediting organizations in relation to Title IV of HEA.

Accountability Must Be Mission-Based

The U.S. system of higher education is highly decentralized, with judgments about quality and effectiveness based on the respective missions of a diverse array of public and private, nonprofit and for-profit, two-year and four-year institutions including research universities, liberal arts colleges and community colleges.

CHEA seeks to work with USDE on the important issues of accountability and quality in the context of our commitment to the decentralized, mission-based system of higher education. A system of accountability that fails to take into account the dramatic variation in mission, purpose, and students in U.S. colleges and universities will also fail to provide useful and reliable information to students, the public, and government. Calls for additional accountability cannot be effectively met through efforts to create a single set of national standards about institutional performance or student learning outcomes.

At the institutional and program level, key indicators such as progress toward an educational goal, graduation and transfer are heavily influenced by institutional mission. We do not expect the same graduation rates from open admission community colleges (in which a limited number of students seek a degree) that we expect from highly selective colleges (where most students seek a degree). The same standard applied to both types of institutions would be meaningless.

At the level of student learning outcomes, key indicators such as competencies gained are heavily influenced not only by the type of institution or program, but by the skills that students bring when enrolling. The same expectations of student learning outcomes across all institutions and programs would not make sense.

Institutional and Program Accreditation are Accountable

Institutional and programmatic accrediting organizations are accountable to higher education, to students, government, and the public in a myriad of ways. Typically, accrediting organizations call on institutions and programs to:

- Provide on-site information about student achievement as part of an accreditation review, including information about retention

and graduation.

- Have goals appropriate to their respective missions and provide evidence that these goals have been achieved.
- Provide audits and financial statements as reliable evidence of fiscal soundness.
- Take significant action when an institution or program fails to meet accreditation standards:
 - Place institutions or programs on public sanction or terminate accreditation if an institution does not comply with standards over a designated period of time;
 - Provide information to the public about institutions placed on sanction or removed from accreditation and the reasons why this was done; and
 - Provide information to the government and the higher education community about "adverse actions" (denial, withdrawal, suspension, revocation or termination) against an institution or program.

Attention to Accountability Through Accreditation Can Be Expanded

CHEA and the accrediting community are aware that the accountability expectations of students, government, and the public are changing over time. While we do not know the breadth or depth of these expectations, we are aware that some constituents are currently seeking additional information from accreditors and institutions in three areas:

- The findings of accreditation review;
- How well institutions and programs perform; and
- How well students learn.

To address these needs in the current climate of accountability, CHEA and the accrediting community are exploring a range of options. If these options are to provide effective service to students, government and the public, several features of accreditation that have been key to its success to date should provide the context for this exploration.

For example, providing additional information to the public should be separate from the direct consultation that occurs between accreditation team members and staff from an institution or program in the course an accreditation review. This consultation yields a professional candor essential to the improvement of academic quality. Second, institutions, programs and accrediting organizations need to be clear about their respective information responsibilities to avoid, e.g., accrediting organizations inappropriately speaking for institutions or institutions inappropriately speaking for accrediting organizations. Third, care needs to be taken that additional information will not be misused for political or other purposes extraneous to the improvement of quality and informing the public.

There are several means by which more information about the findings of accreditation review might be available to students, government, and the public. These include:

- Expand current public disclosure statements from accreditors to include additional information about the findings of accreditation review;
- Develop an "accreditation public information" template that accreditors ask institutions and programs to complete and publicize at the conclusion of an accreditation review;
- Expand the CHEA Institutional Database of 6,500 accredited institutions on the Website and ask institutions (in cooperation with their accrediting organizations) to include a brief description of the major findings of the most recent accreditation activity (comprehensive visit, focused visit, major report); and
- Expand the CHEA Database to include accredited programs as well as institutions.

Additional means by which CHEA, accrediting organizations, institutions and programs can work together to provide more information about institution and program performance may be explored. These include:

- Work with institutions and programs to create individual performance profiles for institutions and programs or enhance existing profiles to provide additional information to the public; and
- Further expand the CHEA Institutional Database to include additional information to the public about institutional and program performance.

Additional means by which CHEA, accrediting organizations, institutions and programs can provide more information about how well students learn may be explored. These include:

- Coordinate with institutions and programs about the feasibility of additional responses to queries about how well students learn through, e.g., enhanced institution or program Fact Books and other information on institution and program Websites;
- Review and, where appropriate, enhance current descriptors (e.g., grades, student portfolios) of how well students learn; and

- Explore a closer connection between accreditation judgments about quality and effectiveness and information about how well students learn.

Some of these ideas may prove workable; others may not. What is clear, however, is that CHEA and the accrediting community have heard the call for additional attention to accountability and are taking action.

We thank you for this opportunity to comment on the reauthorization of the Higher Education Act and look forward to working with you.

Sincerely,

Judith S. Eaton
President