

Testimony of Dr. Judith Eaton, President
Council for Higher Education Accreditation

U.S. Senate Committee on Health, Education, Labor and Pensions
Public Hearing of February 26, 2004

“Higher Education Accreditation: How Can the System Better
Ensure Quality and Accountability?”

Written testimony submitted for the printed hearing record
March 10, 2004

Chairman Judd Gregg and Members of the Committee:

On behalf of the Council for Higher Education Accreditation (CHEA), we submit for your written record the following testimony on accreditation and federal policy. We respectfully request that it be added to the printed record for the Senate Committee on Health, Education, Labor and Pensions (HELP) hearing held on February 26, 2004: "Higher Education Accreditation: How Can the System Better Ensure Quality and Accountability?"

Summary

There are four major elements to our submission:

- a framework, stated in the CHEA *Reauthorization Agenda*,
- comments on witness testimony,
- responses to questions and observations from Senators, and
- CHEA conclusions about the hearing.

First we provide a general framework for the Committee to consider accreditation issues in the Higher Education Act (HEA), building on a sound system and making minor improvements to enhance accountability. We then comment on the many observations and suggestions made by your hearing witnesses, concurring with most and explaining our differences with others. We comment on the observations and reply to the questions raised by the Senators at the hearing.

We conclude by noting that the important accreditation issues were raised and vital principles were laid on the hearing record. Minor adjustments in HEA can improve the accreditation by further strengthening its accountability. CHEA has proposed and supports such changes, based on the diversity of institutional missions and the student bodies served by our highly competitive system of higher education. We urge that any HEA amendments on accreditation be narrowly drawn and thoroughly vetted to avoid unintended consequences.

The CHEA Reauthorization Agenda

In May 2003, the CHEA Board of Directors approved a document, the CHEA *Reauthorization Agenda*, with general principles to guide the Congress as it considers revised HEA legislation. A copy of this two-page document is enclosed. The *Agenda* states that voluntary peer-based quality assurance by higher education is a sound system that serves the public interest well, but that reforms of certain means of accreditation could improve the accountability of the overall process. It encourages Congress to build upon the strengths of the present federal relationship with accreditation and to reaffirm it as the basis of federal law to assure the quality of higher education institutions and

programs that receive federal funding. It proposes expanded commitment to accreditation in student learning outcomes, distance education, and, additional information to the public the findings of accreditation review, as well as a clarification of institutional transfer of credit policies. These suggestions are made in the context that institutions retain decision-making responsibility for their academic policies, based on their varied missions and the diverse student bodies they serve. We commend the CHEA *Agenda* to your committee.

Comments on Witness Testimony

The four witnesses before your Committee on February 26 provided a wide range of ideas and suggestions on HEA and accreditation. In general, we concur with most of these views and proposals, with the notable exceptions that we oppose the “delinkage” of accreditation from federal eligibility and we respectfully disagree with the statement that accreditation is failing to carry out its assigned role under HEA law.

Dr. Crow laid out the positive developments in accreditation over the last decade and addressed specific accreditation issues under active consideration in the Congress: learning outcomes, distance education, disclosure and credit transfer. As Dr. Crow noted, his suggestions address the same issues as the CHEA *Agenda* cited above. However, we do not endorse his specific statutory language, believing that additional discussion with the Committee is needed to assure the best approach on these issues.

Dr. Wallin observed that regional accreditation did a good job at assuring basic quality, but that other efforts were needed to improve assessment in order to address the decline of standards in liberal learning. We, of course, associate ourselves with the statement that accreditation is doing its job, but believe that recent and ongoing efforts by institutions and accreditors are addressing the improved assessment needs where appropriate. Dr. Wallin’s own American Academy for Liberal Education provides a telling example that accreditation can address these issues in a better way where institutions seek another approach. Like three of your witnesses, we do not encourage the federal government to add greater controls on the academic work of institutions and accreditors.

We respectfully disagree with the policy direction and specific content of Dr. Martin’s testimony, as did your other three witnesses. We believe that he failed to provide useful and credible evidence to support his many claims of systemic failure of accreditation. And we oppose the idea that state and federal regulators could replace the thousands of peer-volunteers presently serving to improve quality at our colleges and universities in the current accreditation system. The unworkable idea of state controls was placed in the HEA in 1992. It was known as “SPRE,” the State Postsecondary Review Entities. SPRE was never implemented, totally discredited, and repealed by the Congress in 1998.

Dr. Potts presented a sound rationale for reaffirming the current system and making modest adjustments to improve the accountability of accreditation in recognition of

increased public expectations. Potts urged specific proposals put forward by AASCU, the American Association of State Colleges and Universities. We agree with Dr. Potts' strong statement that the attacks made by Dr. Martin do not conform to his personal observations and experience with the National Advisory Committee on Institutional Quality and Integrity, the federal advisory body on accreditation, and in the field leading accreditation visiting teams. Our own experience and observations support these conclusions of Dr. Potts.

Responses to Senators Questions and Observations

The questions and comments by the Committee members indicate a strong interest in accreditation issues, which we welcome. In our view, the hearing served the Committee well by illuminating important principles in the relationship of the federal government with accreditation and how the present relationship established under the HEA serves the public interest. Your hearing also focused on possible areas of improvements in the HEA reauthorization.

Our comments begin with two points raised at the hearing by **Senator Gregg**, who first observed that the question before the Committee was whether to change accreditation law in HEA a little or a lot. We respectfully suggest that the preponderant balance of evidence from both the witnesses and the indications of the views of Senators at the hearing should lead your Committee to conclude that small changes are needed and that massive changes would be counterproductive. We note that CHEA and three of the four witnesses are firmly in this camp. Concrete suggestions have been brought to the Congress on the best ways to do so.

The second point from Chairman Gregg regarded distance education. Several witnesses replied that the law does not and should not add new and separate education standards for institutions and their accreditors. We concur. While accreditors and institutions have developed new techniques and processes to usefully assess distance education, the basic premise should be that standards are the same for all delivery systems. Should the Congress choose to expand federal eligibility to new distance education programs, accreditation organizations have already demonstrated their ability to provide quality assurance.

Senator Alexander made several important statements essential to a sound reauthorization of the HEA. We applaud his expressed wariness toward any proposal to restrict the autonomy of institutions, because autonomy is a key to their success. We likewise applaud his emphasis that federal law does and should direct accreditation to determine "sufficient quality" as the correctly minimal standard, in order to receive federal support. This understanding is vital to sustaining the proper balance of government and voluntary activity. It allows accreditors to do their work well and keeps them and the government out of other areas best left to academic officials on campuses. Also, he observed the role of the marketplace of student choices in U.S. higher education

and the need to sustain freedom of choice. These are foundations of sound accountability in HEA programs.

We also agree with two other principles Senator Alexander voiced at the hearing as very useful guidance for his Senate colleagues. He cited grade inflation as a problem, but noted that it should be solved by campus presidents, and not by accreditors or the government. And he properly rejected the proposed role of states replacing accreditors as a useful determinant of minimum quality because “no state would unaccredit itself.”

Senator Alexander challenged the higher education community to offer additional ideas to improve voluntary accreditation while maintaining its significant advantages for students, their institutions and the public interest. We especially would like to explore the means and the implications of his question, also raised by **Senator Sessions**. How can the new HEA law encourage more choices and less monopoly in accreditation while sustaining institutional autonomy? Several witnesses cited some examples of competition in the present system. CHEA hopes that we may be able to provide some ideas to the Committee that might be helpful.

In direct reply to two of Senator Alexander’s questions, we share the views expressed by the several witnesses that it would be difficult to improve the federal interests by expanding the Secretary’s authority over accreditation or utilizing some special federal panel for accreditation disputes. Either of these two approaches would likely upset the balance among federal and state government authorities, institutions and voluntary, private accreditation organizations. It would be especially difficult to establish in law and regulation any sound and objective criteria whereby either such authority might be invoked.

Finally, we appreciate the observations made by **Senator Clinton** on the valuable contributions and high quality of our higher education institutions and our voluntary system of accreditation. We note especially her agreement with Senator Alexander in her statement that “the autonomy and independence of the higher-education system is a precious asset.” Senator Clinton’s view that higher education and its quality assurance serves our country well and should not be upended sounds to us like a very useful basis for the HEA deliberations.

Conclusions

Your February 26 hearing placed on the record the important higher education quality assurance issues facing our country. The hearing provided a variety of views and offered numerous proposals. With one strong exception, the hearing record urges the Congress to reaffirm the half-century partnership of voluntary accreditation with the federal government to assure that higher education institutions and programs receiving federal funds provide a quality education. Two Senators stressed that autonomy in academic decisions is a key strength and a reason for the success of higher education in our country.

Minor adjustments can improve the system to address newly-manifest public expectations for clear accountability. CHEA has proposed and supports such changes, so long as they are rooted in the primacy of institutional missions and the different students served by our diverse and highly competitive system of higher education. Given the complexity and fragility of the vast matrix of colleges, universities and schools supported by the HEA, we urge caution that any amendments be narrowly drawn and thoroughly vetted to avoid unintended consequences. We repeat our offer to serve as technical advisors to the Committee in drafting amendments, as we have the expertise and contacts with the field to understand fully how any change in the HEA law might work in practice.

Thank you for the opportunity to provide this submission to your hearing record.

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March 10, 2004

Enclosure: CHEA Agenda for HEA