

22 November, 2011

National Advisory Committee on Institutional Quality and Integrity  
c/o Melissa Lewis  
Executive Director  
1990 K Street NW, Room 8060  
Washington, DC 20006

Dear Committee Members:

We thank the National Advisory Committee on Institutional Quality and Integrity (NACIQI) for its October 18, 2011 draft on the future role of accreditation. The paper provides an important opportunity to reflect on some of the major issues associated with the accreditation-federal government relationship.

**REVIEWING THE DRAFT**

The draft reflects many views and a range of opinions about accreditation, as is typical of many conversations on this important subject. Two themes, however, appear to dominate the diverse considerations: (1) affirmation of the need to more fully address public accountability and (2) an expansion of the federal interest to include quality assurance. While many in higher education and accreditation agree about the importance of public accountability, this expansion of the federal interest represents a major shift in the accreditation-government partnership that has been in place for 60 years.

The federal interest in accreditation to date has focused on quality: holding accrediting organizations, working with colleges and universities, accountable for at least a threshold level of academic excellence. As proposed in the draft, the federal interest is expanded to include quality assurance: judging or deciding what counts as this threshold level of excellence and directing the operation of accrediting organizations.

The paper breaks dramatic new ground through this expansion. As presented in the draft:

- Accreditation standards, requirements and processes are to be shaped by a *federal* agenda.
- *Federally* mandated fiscal integrity and performance measures are to be established for higher education institutions as monitored by accreditation.
- *Federal* goals for higher education are to be developed for use of federal funds.

The assumption appears to be that that unless there is significant additional government direction, oversight and monitoring of the accreditation process, public accountability is not adequately addressed.

This change shifts the “ownership” of accreditation from the higher education community that established this process to government. The change shifts the definition of quality from a consideration of academic excellence to consideration of, e.g., consumer protection or efficient use of federal funds or public disclosure – all important to be sure, but not to be confused with academic excellence.

And, whatever the determination with regard to a front-and-center issue of the paper – whether to keep, keep with modification or eliminate the gatekeeping role of accrediting organizations – the message is that the federal interest is expanding. If gatekeeping is maintained, accreditation is federalized. If gatekeeping is not maintained, the foundation for government oversight of quality assurance is assured.

The change legitimates a path of federal scrutiny of accreditation about which we have expressed concern for the past five years: government both expanding its examination of accreditation and also judging academic matters, taking on tasks that have been traditionally the responsibility of the academic community. It moves us away from a needed balance in the accreditor-federal relationship: a division of responsibilities between accreditation and the government that continues the longstanding tradition of institutional leadership in academic decision-making and the responsible independence of accrediting organizations while attending to accountability. It is incompatible with the core values on which the success of higher education has been built: peer review, institutional autonomy and academic freedom.

### ***SOME SUGGESTIONS FOR CONSIDERATION***

Do we need to take so drastic a step? NACIQI is urged to consider the following suggestions, some of which may or may not align with various options raised in the paper. These are not easy. They would require significant cooperation and work among the federal government, institutions and accrediting organizations. However, we believe that the suggestions, taken together, enable all of us to better address public accountability without the expansion of the federal interest into quality assurance.

What follows, bluntly, is a trade-off. What if:

1. Institutions annually collect and publish information about the core results of their performance. This may include graduation rates, achievement of other educational goals, transfer, entry to graduate school, job placement (where appropriate), attrition and retention, taking into account respective missions. These baseline indicators developed by institutions serve as acceptable representations for threshold quality. Evidence that threshold quality is not met will require additional action.
2. The U.S. Department of Education and other federal agencies expand their monitoring of student aid and other federal funds. This expansion, addressing the many concerns about the financial integrity of student aid, also serves public accountability.

To detect problems with the use of federal funds, consider developing triggers, indicators of specific problems in colleges and universities that are to result in additional scrutiny of these institutions or other actions. These might be a pattern of, for example, excessive student loan default rates, excessive dropout rates attributable to financial and not academic reasons, excessive debt levels of students upon leaving an institution, and evidence of fraud and abuse.

3. The current federal recognition review is streamlined to focus on the basic soundness of accrediting organizations, especially as this relates to their role in quality improvement. This change is made feasible because of the expanded commitment to public accountability in the first two suggestions above.

The soundness requirements may include scrutiny of the following features of accrediting organizations. These bodies might be required, for example to:

- Publish standards for accreditation and lists of all accredited institutions or programs.
- Provide information to the public about the basis for decisions to accredit or not accredit.
- Award accredited status for a specific time period, monitor ongoing compliance with standards and periodically undertake additional reviews as a condition of continued accreditation.
- Assure that peer review is central to the accreditation process
- Have been in operation for at least two years and accredit at least one institution or program at each degree level described in the scopes of accreditation.

Overall, institutions and government expand their efforts with regard to public accountability. There is no longer a need, in the name of public accountability, to expand the government role into quality assurance. Individual colleges and universities are responsible to take steps to more fully address public accountability in accreditation through the establishment of performance indicators for threshold quality. The federal government agrees to provide greater oversight of student financial aid and other funds as part of this public accountability effort. Both agree to maintain the gatekeeping role of accreditation, with

the proviso that the review is “light touch” and focused on the basic soundness of accrediting organizations related to quality improvement.

These suggestions provide a number of advantages. For government and the public, they yield significantly enriched reliable information about the performance of thousands of colleges and universities. For higher education and accreditation, they do not sacrifice the core features of higher education that are tied to its many successes to date: a mission-based enterprise built on the value of peer review, institutional autonomy and academic freedom. They do not compromise the vital quality improvement role of accreditation. For both accreditation and government, they enhance accountability to the public.

### **SUMMARY**

Although the NACIQI paper reflects a range of views with regard to the accreditation-government relationship, all are predicated on concern for greater public accountability and an affirmation that quality assurance is a federal interest that calls for a significantly enlarged role in directing and judging academic quality, heretofore the primary province of the higher education community.

The suggestions presented above are to modify, not expand, the federal role in accreditation. At the same time, they enlarge the commitment to public accountability. This would take place through (1) holding institutions accountable for developing a small set of performance indicators that would be annually collected and published, (2) clarifying and strengthening the federal role in monitoring student and other federal funds in higher education and (3) providing for a streamlined federal review of accreditation that is focused on its general soundness to operate, with particular attention to quality improvement.

Thank you.

Sincerely,

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

Judith Eaton  
President