

REMARKS PRESENTED BY

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**COUNCIL FOR HIGHER EDUCATION ACCREDITATION
to the
NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY**

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Thank you for allowing me to make this presentation in response to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) draft report of October 18, 2011. My remarks are drawn from the written comments submitted by the Council for Higher Education Accreditation (CHEA) to NACIQI on November 22, 2011.

As I read the report, there are two major themes:

- The urgency of greater public accountability for higher education and accreditation
- An apparent assumption that solutions to address greater accountability need to involve an expanded role for government in relation to higher education quality.

These themes apply across all the 33 options in the draft report.

With regard to the all-important issue of gatekeeping – to keep, modify or discard – all solutions in the draft require this expanded government role. This means that, ultimately, the decision about gatekeeping may emerge as less important than the role government plays in relation to higher education quality.

I describe this expanded role as a shift, whether intended or not, in the federal interest *from* quality, holding the academic community responsible for academic excellence, *to* a federal interest in quality assurance where the federal government:

- decides what counts as academic quality and
- additionally manages/directs the operation of accrediting organizations.

Responding to the urgency of greater public accountability has been acknowledged by all of us.

An expanded government role as the means to achieve this accountability is problematic – neither needed or desirable.

The November 22, 2011 comments by CHEA provide an alternative to an expanded government role. What if:

- Institutions identify, collect evidence and publish performance indicators – aggregate data on, e.g., graduation, achievement of other educational goals, transfer, entry to graduate school. It is essential that *institutions* select and judge these indicators. This is not the work of government.
- The federal oversight of student and other federal funds is expanded, with acknowledgment that this is not a primary responsibility of accreditation.
- The federal recognition review of accreditors is streamlined and focused on the basic soundness of accrediting organizations, using the examples provided in the comments.

These suggestions provide for greater public accountability. They:

- Address both student learning outcomes and transparency – at the heart of greater public accountability.
- Assure that students and the public know more about the effectiveness of institutions.
- Assure that NACIQI knows more about the effectiveness of institutions.

We need this focus on the institutional level. Students don't attend "higher education." They attend colleges and universities. When students and the public want to know about the "quality of higher education," they are seeking information about specific, individual institutions: "...Do I want to attend/what will happen if I attend...University of Maryland College Park, SUNY-Albany or Keiser University?"

These suggestions help us address problematic schools or "bad actors" by focusing on performance indicators that can toughen scrutiny of institutions seeking initial accreditation.

These suggestions help us address continuing accreditation when examining problematic institutions by providing grounds to tighten the time period during which these schools can come into compliance.

Finally, I offer a few additional comments on the third suggestion: streamlining the federal recognition review.

I am worried that the federal review is approaching micro-management of accrediting organizations. Some NACIQI members also reflect this concern, commenting on "nit-picking," "picky issues" and "the process is picky."

"Micro-managing" is about directing the fine details of accreditation operation that may or may not be in the service of academic quality and serving students.

Does micro-managing accrediting organizations – by anyone – improve student achievement and attainment? I think not.

Are we forgetting that examining the operation of accrediting organizations is not – and should not – be an end in itself? Perhaps.

Do we have a growing disconnect between review of accrediting organizations and our ultimate goals – academic excellence, student achievement, student attainment? We need to consider this.

In summary:

- We are all in this together.
- It is so important to keep our focus in mind: We all want academic excellence, student achievement, student attainment.
- We can and should do more about public accountability.
- I have two hopes:
 - We avoid an expanded government role where government replaces academic judgment about academic quality and
 - We avoid the tendency to micro-manage the work of accrediting organizations – this does not serve the goals of academic excellence, student achievement and student attainment.

Thank you.