

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
c/o Carol Griffiths  
Acting Executive Director  
1990 K Street NW, Room 8073  
Washington, DC 20006

Dear Committee Members:

We thank the National Advisory Committee on Institutional Quality and Integrity (NACIQI) for this opportunity to comment on its draft final report (hereafter "report") on accreditation considerations for the reauthorization of the Higher Education Act.

We share NACIQI's view that accreditation should continue to be the primary vehicle for assuring and improving quality in higher education. At the same time, we believe that some recommendations in the report may lead to a federal standardization of expectations of academic quality. The report suggests a more active role by the U.S. Department of Education (USDE) in the practices of accreditation. These recommendations would move accreditation away from its focus on institutional academic leadership through peer review that has been integral to its success and effectiveness and would alter the relationship between institutions and accreditors in counterproductive ways. Accordingly, we urge NACIQI to reconsider many of the recommendations contained in the report.

We are concerned that the report calls for greater federal involvement in the regulatory activities by the states as this affects accreditation. It is neither appropriate nor authorized by statute for NACIQI or USDE to direct state governments in their regulatory activities. Accrediting organizations and states have a long and successful history of working together without this involvement.

We are also concerned that the report suggests that the federal government could play an active role in the design of accreditation. Decisions about the structure of accreditation are the primary responsibility of institutions and accreditors, not government. Specifically, the report contains a recommendation that a system of accreditation more closely aligned to mission or sector rather than geography "may be called for." If a sector of higher education chooses to establish an accreditation organization, it is free to do so without federal involvement, unless the organization seeks federal recognition.

Additionally, we are concerned that the report moves us in the direction of requiring national standards to be used in accreditation reviews. The evaluations of institutions and programs are based on accreditation standards as they apply to specific institutional or programmatic missions. Moving away from evaluation of mission-driven effectiveness to a system of institutional or programmatic compliance with national standards, as the report appears to suggest, means that accreditation's focus on improvement would be lost. Institutions would be sapped of their ability to be creative, flexible, innovative and distinct.

Similarly, it is neither appropriate nor desirable for the federal government to prescribe, as the report suggests, how accrediting decisions are publicized or to direct the extent of the information to be released on these decisions. These determinations appropriately are made by accrediting organizations. Institutions and programs should be held accountable to provide useful and reliable information to the public on issues of importance including learning outcomes, graduation rates and job placement (where appropriate).

The report's recommendations about the future role of NACIQI are also of concern. Although NACIQI advises the Secretary of Education on accreditation-related issues, the committee's primary purpose is to make recommendations regarding the recognition of accrediting organizations. Shifting NACIQI's focus from recognition reviews would be to the detriment of the entire recognition process. Designing accreditation processes and determining how best to oversee academic quality and institutional improvement is the province of the academy, not the federal government.

Taken together, the recommendations put forth in the report suggest fundamental changes to the relationship among the federal government, state governments and accreditation. The federal government would assume a more directive and prescriptive role with states in their regulatory activities and with accreditation in its standard-setting and review of individual institutions. We believe the recommendations would move us in the direction of nationalizing standards for quality and the operation of accreditation as well as the teaching and learning activities of our institutions. This would include, as the report indicates, federal direction with regard to the data that accreditors collect and the information that is made available to the public. NACIQI would become less an advisory committee on recognition decisions by USDE and would assume greater authority in the accreditation process itself. These changes to accreditation and how it operates are neither necessary nor desirable.

Accreditation would not be strengthened by many of the recommendations contained in this report. Rather, its fundamental commitment to institutional academic leadership through peer review, focusing on institutional improvement, would be altered and perhaps severely diminished. For the reasons noted above, we encourage NACIQI to reconsider many of these recommendations.

A far better approach would be to address accreditation as an effective process – not an undertaking in need of repair – that can be strengthened through better communication and coordination among accrediting organizations, states and the federal government. This approach would lead to shared expectations for quality, improvement and accountability while nonetheless maintaining the leadership of the academy. We urge NACIQI to consider the many proposals to further strengthen accreditation that have been put forward by the accreditation community.

Thank you.

Sincerely,

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

Judith Eaton  
President

On behalf of:

Accreditation Council for Business Schools and Programs  
Accreditation Council for Pharmacy Education  
Accrediting Commission of Career Schools and Colleges  
Accrediting Council for Independent Colleges and Schools  
Accrediting Council on Education in Journalism and Mass Communications  
American Board of Funeral Service Education, Committee on Accreditation  
American Dietetic Association, Accreditation Council for Education in Nutrition and Dietetics  
American Podiatric Medical Association, Council on Podiatric Medical Education  
American Psychological Association, Commission on Accreditation  
American Speech-Language-Hearing Association, Council on Academic Accreditation in Audiology and  
Speech-Language Pathology  
Association for Biblical Higher Education, Commission on Accreditation

Association for Clinical Pastoral Education, Inc., Accreditation Commission  
Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission  
Commission on Accreditation of Allied Health Education Programs  
Commission on Collegiate Nursing Education  
Council for Higher Education Accreditation  
Council on Social Work Education, Office of Social Work Accreditation and Education Excellence  
Distance Education and Training Council, Accrediting Commission  
International Assembly for Collegiate Business Education  
Joint Review Committee on Education in Radiologic Technology  
Joint Review Committee on Educational Programs in Nuclear Medicine  
Middle States Association of Colleges and Schools, Middle States Commission on Higher Education  
Montessori Accreditation Council for Teacher Education  
National Council for Accreditation of Teacher Education  
New England Association of Schools and Colleges, Commission on Institutions of Higher Education  
North Central Association of Colleges and Schools, The Higher Learning Commission  
Southern Association of Colleges and Schools, Commission on Colleges  
Teacher Education Accreditation Council, Accreditation Committee  
Western Association of Schools and Colleges, Accrediting Commission for Community and Junior  
Colleges  
Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and  
Universities