

April 24, 2015

Senator Lamar Alexander, Chair
Committee on Health, Education, Labor and Pensions
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chair Alexander:

Thank you for the opportunity for the accreditation community to comment on the "Higher Education Accreditation Concepts and Proposals" white paper. The paper is a useful summary of many of the ideas and thoughts currently circulating about accreditation. Rather than attempting to comment on all of these items, we will focus on the ideas that are likely to have the greatest impact. These are the history of the effectiveness of accreditation, innovation, accreditation's gatekeeping role, the role of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) and clarification of the public policy responsibilities of accreditation.

As you are aware, accreditation in higher education pre-dates the use of accreditation for federal purposes. Accreditation has worked with and assisted higher education through many significant changes, including the expansion of higher education as the result of the GI Bill in the 1950's, the advent of community colleges in the 1960's and 1970's, the significant changes in educational delivery such as distance education through technology in the 1980's and 1990's and, at present, competency-based education. Accreditation has been successful in its work with colleges and universities.

Accreditation takes seriously its representation that institutions have academic rigor based on the education they are professing to provide, that student learning and achievement are a product of that rigor and that students who finish leave institutions with the skills necessary to live and work with a better quality of life than if they had not completed their education.

That being said, the community is aware that continued advancement and enhancement is needed. As higher education changes to address the needs of a changing world, so too must accreditation change and improve to keep pace with the quality assurance needs and demands of students, the public, institutions and government. We understand the need to keep current with innovation in higher education and commit to do so. We also believe there are several features of the current accreditation system that should be preserved. These are peer review, institutional autonomy and commitment to institutional mission and academic freedom.

As accreditation continues its efforts to address innovation, we also point out that, in part, concerns about innovation are driven by anxiety about the inability of students of new providers to receive Title IV funds. The law permits and accreditors agree that new accreditors are able to organize at any time. However, access to Title IV money is restricted through legislation and regulation and that can be remedied in a reauthorization of the Higher Education Act.

Federal recognition of accreditation is often bureaucratic. This is the result of not only the functioning of NACIQI but also the recognition process itself. The process needs a thorough overhaul to (1) eliminate unnecessary regulation, duplication of regulation and ad hoc regulation (*Dear Colleague* letters,

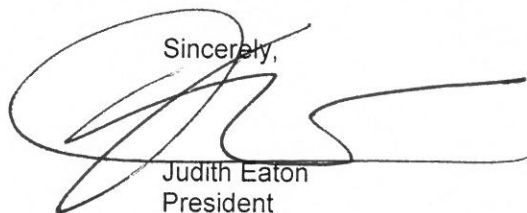
responses to complaints), (2) move away from one-size-fits-all style of enforcing regulation, (3) streamline the recognition review by establishing a small, core set of regulations focused only on accreditors carrying out the task required by law – serving as reliable authorities on educational quality, eliminating the calls for irrelevant evidence and data and ending the practice of accreditors effectively reporting to the committee on an annual basis and (4) establish clear requirements for staff practice that would assure that items 1 through 3 are followed.

We believe that NACIQI would improve if the following steps were taken: (1) revise the charge to the committee with the intent of focusing its work only on recognition and only on examining accreditors as reliable authorities on educational quality, (2) change the positioning of the committee within the Department to work directly with the office of the highest-level higher education official, (3) return to the pre-2008 practice of the Department staff making recommendations to the committee (and the committee then recommending to the highest-level higher education official), (4) reduce the size of the committee to 12 and (5) require at least one current or former accreditation professional on the committee, someone who has worked with institutions and programs in an accrediting organization.

For the current reauthorization, we look for a re-balancing of the relationship between accreditors and the federal government to assure that accreditors' primary responsibility is educational quality and that government's primary responsibility is compliance with student aid and research funding requirements. The Higher Education Act identifies the requirements for recognition. Accrediting organizations need to be reviewed based on these expectations in the Act, not on additional requirements determined through regulation. The federal recognition process needs to be streamlined by eliminating regulatory duplication and assuring the independence of accrediting organizations to determine academic quality.

In response to the paper's proposals 2 and 3 in the section "Refocus Accreditation on Quality," accreditors maintain that, at present, they have the ability to be flexible and nuanced in their reviews through determining the length of accreditation, calls for interim reports and additional data collection, additional visits and sanctions. The majority of accreditors are opposed to federally determined gradation in accredited status and reviews.

We are prepared to continue to work with the committee in the effort to establish excellence in accreditation.

Sincerely,

Judith Eaton
President

On behalf of:

Accreditation Commission for Acupuncture and Oriental Medicine
Accreditation Commission for Audiology Education
Accreditation Commission for Education in Nursing
Accreditation Commission for Midwifery Education
Accreditation Council for Business Schools and Programs
Accreditation Council for Pharmacy Education
Accrediting Council for Continuing Education and Training
Accrediting Council for Independent Colleges and Schools
Accrediting Council on Education in Journalism and Mass Communications
American Library Association Committee on Accreditation
American Physical Therapy Association Commission on Accreditation in Physical Therapy Education

Association for Biblical Higher Education Commission on Accreditation
Association of Advanced Rabbinical and Talmudic Schools
Aviation Accreditation Board International
Commission on Collegiate Nursing Education
Council for Higher Education Accreditation
Council for Standards in Human Service Education
Council for the Accreditation of Educator Preparation
Council on Naturopathic Medical Education
Council on Rehabilitation Education
Council on Social Work Education
Distance Education Accrediting Commission
Higher Learning Commission
Joint Review Committee on Education in Radiologic Technology
Middle States Commission on Higher Education
Montessori Accreditation Council for Teacher Education
National Accrediting Commission of Career Arts and Sciences
National Recreation and Park Association Council on Accreditation of Parks, Recreation, Tourism and
Related Professions
New England Association of Schools and Colleges Commission on Institutions of Higher Education
Southern Association of Colleges and Schools Commission on Colleges
The Commission on Accrediting of the Association of Theological Schools
WASC Senior College and University Commission