
October 24, 2019

The Honorable Bobby Scott
Chair, House Committee on Education and Labor
1201 Longworth House Office Building
Washington, DC 20515

The Honorable Virginia Foxx
Ranking Member, House Committee on Education and Labor
2462 Rayburn House Office Building
Washington, DC 20515

Dear Reps. Scott and Foxx:

The Council for Higher Education Accreditation (CHEA) appreciates the opportunity to comment on *The College Affordability Act* (H.R. 4674). As the only organization with the sole purpose of providing national coordination of accreditation of higher education institutions and programs in the United States, CHEA has an active interest in reauthorization of the Higher Education Act (HEA) and its impact on accreditation.

As we point out in our position paper on *Appropriate Accountability for Accreditation and Federal Policy*, CHEA sees appropriate accountability as central to achieving three major goals to move accreditation forward. These goals are doing more to: 1) protect students by strengthening accreditation rigor and providing expanded, readily understandable and accessible information about institutions and programs; 2) advance innovation by encouraging fresh approaches to quality review of traditional providers and expanding quality review to new providers and new credentialing; and 3) sustain the historic strengths of accreditation through academic leadership of institutions and programs, commitment to institutional mission, commitment to academic freedom and maintaining the important role of peer review and formative evaluation,

While CHEA may agree with the results sought by some of the provisions in this bill, e.g., accountability and transparency, we do not believe that government should be ever more involved in what have historically been the responsibilities of the academy. The goals of improving access and affordability and enhancing accountability to students and society are commendable; however, there are a number of provisions contained in H.R. 4674 that undermine the longstanding strengths of higher education and accreditation.

- There would be a major expansion of federal authority, replacing academic judgment and decision making, e.g., setting requirements for the content of some accreditation standards as well as setting expectations of levels of institutional and program performance.

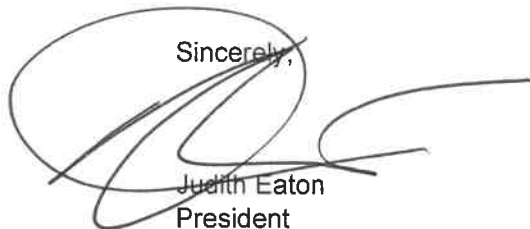
- Accrediting organizations would be required to have completion and workforce participation performance benchmarks which would be subject to the approval of the U.S. Department of Education (USDE).
- Accreditors would now need to have a separate standard for competency-based education if the accreditor reviews these offerings.
- The bill also directs how accrediting organizations are to operate, diminishing the academic oversight of these nongovernmental bodies.
 - Accrediting organizations' decision-making bodies would be subject to government requirements that determine who can qualify to serve on these bodies. The bill increases the proportion of public members for accrediting commissions and contains a more restrictive definition of who would qualify as a public member.
 - Common definitions across all accreditors for a number of key terms used in judging accredited status would be established, diminishing, if not eradicating, an accrediting organization's capacity to take into account significant differences among institutions and programs and differences across different types of accrediting organizations.
- The role of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) would be expanded considerably beyond its current role and capability as an advisor to the Secretary of Education on the recognition of accrediting organizations. NACIQI would be tasked with evaluating the effectiveness of the required measures and performance benchmarks in the bill and comparing similarly situated accrediting organizations.

The bill significantly diminishes the role of institutional mission of colleges and universities as the foundation of accreditation judgments about quality, with many provisions in the bill taking a one-size-fits-all approach. The centrality of peer review and formative evaluation by accreditation is lessened, replaced by a focus on meeting requirements set by government.

Congress has the opportunity, through HEA reauthorization, to establish appropriate boundaries for USDE's oversight of accrediting organizations in its recognition process. Reauthorization should reaffirm accreditors as accountable for academic quality and USDE as responsible for Title IV compliance issues. However, H.R. 4674 takes a different approach by lessening academic leadership in a number of areas and expanding government involvement in academic decision making and oversight.

Because of our concern with a number of the bill's accreditation provisions, we cannot support this legislation in its current form. This being said, we are willing to work with members of Congress to improve the accreditation provisions in the bill.

Sincerely,



Judith Eaton
President

cc: Members of the House Committee on Education and Labor