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March 9, 2022

Richard Corcoran  
Commissioner  
325 West Gaines Street  
Tallahassee, Florida 32399-0400

Dear Commissioner:

The Council for Higher Education Accreditation (CHEA) would like to express thoughts that we have with the accreditation provisions contained in SB 7044, a bill passed by the Florida Senate on March 7, 2022. A national advocate and institutional voice for academic quality through accreditation, CHEA is a U.S. nonprofit association of degree-granting colleges and universities and recognizes institutional and programmatic accrediting organizations. CHEA is the only national organization focused exclusively on accreditation and quality assurance. I am writing both as the President of CHEA and as a Florida resident.

While SB 7044 contains a range of higher education-related provisions, our specific comments are with the section on accreditation:

- As written, the bill would require that institutions “not be accredited by the same accrediting agency or association for consecutive accreditation cycles.” It has been suggested that this would provide a fresh perspective as part of the accreditation process. In reality, accreditation is not a subjective process, and all recognized accrediting organizations must apply similar standards to institutions and must meet the same standards for recognition. This is true for both U.S. Department of Education and CHEA recognition.
- Requiring institutions to periodically change accreditors would place a significant burden on accredited colleges and universities and, ultimately, on students and taxpayers. The process of accreditation and reaccreditation is both time-consuming and not without financial impact.
- Requiring that institutions change accrediting organizations each accreditation cycle would mean, in practical terms, that institutions need to meet the accreditation requirements of one accreditor while applying for candidacy with another accrediting organization simultaneously. This would require additional staff and time expenditures by faculty and administration, the cost of which would be borne by students in the form of higher tuition and by taxpayers in the form of needed funds to carry out these accreditation-related activities. This would be a duplication of efforts and financial resources
- The sponsors of this legislation have said that it would parallel changes made recently by the U.S. Department of Education to refer to regional accrediting organizations as “institutional”

accreditors and permit them to accredit institutions outside of their region. This was meant as an option for accreditors recognized by the Department of Education, not a requirement.

- Additionally, requiring that institutions send the State Board of Education a quarterly report on the process of seeking and applying for accreditation by a new accreditor would be a costly and time-consuming burden.
- A hallmark of accreditation is the requirement for continuous improvement by an institution. Accrediting organizations look not just at a college or university's institutional or academic quality but also at ways it has improved and can improve in the future. Changing accrediting organizations every accreditation cycle means that an accrediting organization's historical understanding of the institutions it accredits would be lost, and the focus on continuous improvement would be diminished.
- The language on the recognition of accrediting organizations also would benefit from clarification. The term "recognition" of accrediting organizations means that the accreditor's quality and standards have been affirmed. Both the U.S. Department of Education and CHEA recognize U.S. institutional and programmatic accrediting organizations, and both maintain databases of recognized accreditors. CHEA recommends for your consideration that the following language be added in lines 302, 328 and 409 of SB 7044, first engrossed version (following "the database created and maintained by the United States Department of Education"): and the Council for Higher Education Accreditation list of recognized accrediting organizations.

The Council for Higher Education Accreditation is the academy's representative on issues related to academic quality and institutional improvement. It has been our position that all accreditation requirements should have the same ultimate goal: ensuring that the focus of higher education is and remains on student success. It is the success of students at institutions in Florida that should be the paramount consideration.

We hope that these points will be taken under advisement.

Sincerely,



Cynthia Jackson-Hammond, Ed.D.  
President