

Council for Higher Education Accreditation

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March 4, 2015

The Honorable Richard Burr
U.S. Senate
217 Russell Senate Office Building
Washington, DC 20510

Dear Senator Burr:

The Council for Higher Education Accreditation (CHEA) strongly supports S. 559, the Supporting Academic Freedom through Regulatory Relief Act. We particularly applaud the bill's intent to repeal regulations related to the definition of credit hour and state authorization and to prevent further action by the U.S. Department of Education (USDE) to establish a college ratings system, the Postsecondary Institution Ratings System.

CHEA has voiced concern about credit hour and state authorization regulations since these rules first were proposed by USDE in 2010. These regulations alter the traditional role of accreditation and its relationship with the federal government and with states.

CHEA has shared its views regarding the problems these regulations with USDE as well as with the U.S. Senate and House of Representatives and we have supported earlier legislation to repeal these regulations.

Regulations creating a federal definition of a credit hour move USDE into an area heretofore reserved for academe and accreditation. At their core, credit hour decisions are academic judgments. This is the work of academic faculty and administrators, not the federal government.

State authorization rules place USDE in a position of authority over decisions concerning which institutions may operate in various states, upsetting the previous relationship among the federal government, states and accreditation.

With regard to the college ratings system, the framework released by USDE has resulted in confusion and concern in the higher education community. In particular, we are concerned about the impact on accreditation.

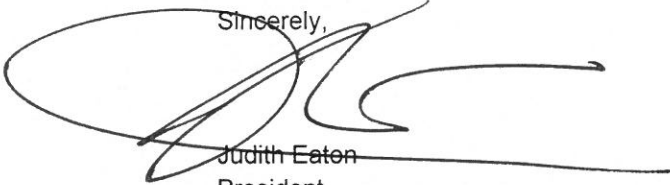
USDE has said that a purpose of the college ratings system is to "help inform" accreditation. It is not clear what this means. Does USDE intend to augment or perhaps even replace

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accreditation with ratings in some circumstances? Will the ratings of institutions become a factor in the federal recognition review of accreditors? Does USDE envision playing a central role in learning outcomes, requiring the federal government to take responsibility for student performance, a job currently undertaken by institutions and accreditors? Would the ratings mean that access and affordability become quality indicators? Will the ratings' set of quantitative indicators replace the in-depth, peer-based, periodic review of colleges and universities by academics and the public that is provided through the accreditation process? As a country, do we want to move toward a quality assurance model where government, not academics and accreditors, defines and judges quality?

It is our hope that S. 559 will be quickly passed by the Senate and that the companion bill in the U.S. House of Representatives, H.R. 970, also is quickly considered and passed.

Thank you for introducing this important legislation.

Sincerely,

Judith Eaton
President

cc: The Honorable Lamar Alexander
The Honorable Shelley Moore Capito
The Honorable Bill Cassidy
The Honorable John Cornyn
The Honorable Tom Cotton
The Honorable Steve Daines
The Honorable Michael Enzi
The Honorable Deb Fischer
The Honorable Jeff Flake
The Honorable Charles Grassley
The Honorable Orrin Hatch
The Honorable Johnny Isakson
The Honorable John McCain
The Honorable Lisa Murkowski
The Honorable Rob Portman
The Honorable Pat Roberts
The Honorable Marco Rubio
The Honorable Tim Scott
The Honorable Thom Tillis