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August 3, 2017

Joe Conaty  
Delegated the functions and duties of the Deputy Secretary  
Co-Chair, Agency Reform Taskforce  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20202

Dear Mr. Conaty,

The Council for Higher Education Accreditation (CHEA) has received your July 26, 2017 message regarding Executive Order 13781. CHEA appreciates the opportunity to comment on changes that the U.S. Department of Education can undertake to improve its work to “best serve the needs of America’s students.”

CHEA’s comments will focus on two of the areas you highlight in your email; first, “ways ED can be more efficient in meeting the needs of students, families and our education partners” and second, “activities or functions ED should consider combining or modifying.”

First, “ways ED can be more efficient in meeting the needs of students, families and our education partners”:

- A) Remove the definition of credit hour (§§ [600.2](#), [602.24 \(f\)](#)).
- B) Eliminate the State Authorization rules (§§ [600.2](#), [600.9](#) and [668.50](#)).

Second, “activities or functions ED should consider combining or modifying”:

- A) Rethink the requirements for the extent of experience in order to become a recognized accreditor ([602.12](#)).
- B) Streamline what is considered “substantive change” for an institution or program in order that fewer changes are subject to this process, including the establishment of branch campuses ([602.24](#)).
- C) Remove U.S. Department of Education final oversight in posting accreditor actions and decision letters (<https://www.regulations.gov/document?D=ED-2016-ICCD-0035-0024>).

- D) Eliminate U.S. Department of Education oversight of differentiated review ([http://kry224-site0001.maxesp.net/pdf/042216\\_ED\\_Accreditation%20Letter.pdf](http://kry224-site0001.maxesp.net/pdf/042216_ED_Accreditation%20Letter.pdf)).
- E) Rethink the role of the National Advisory Committee on Institutional Quality and Integrity, including the creation of an alternative committee structure and operation ([20 U.S. Code § 1011c](#)) ([602.34](#)).
- F) Revise Negotiated Rulemaking to assure that it is a balanced, transparent and consultative process ([20 U.S. Code §1098a Section 492](#)).

Additional suggestions are contained in the CHEA *Position Paper on Regulatory Relief for Accreditation* (<http://www.chea.org/userfiles/Occasional%20Papers/Regulatory-Relief.pdf>).

Thank you for considering CHEA's comments. We would be glad to discuss these and other concerns you may have at your convenience.

Sincerely,

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

Judith Eaton  
President