

# **National Advisory Committee on Institutional Quality and Integrity**

## **Written Comments from the April 2012 Teleconference**

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# ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
c/o Carol Griffiths  
Acting Executive Director  
1990 K Street NW, Room 8073  
Washington, DC 20006

Dear Committee Members:

The Accrediting Commission of Career Schools and Colleges (ACCSC) appreciates the opportunity to continue to participate in the extended dialogue with the National Advisory Committee on Institutional Quality and Integrity (NACIQI) about the current system of recognition, accreditation and student aid eligibility, and the opportunity to provide comment on the February 8, 2012 NACIQI Draft Final Report: Higher Education Accreditation Reauthorization Policy Recommendations.

Given that ACCSC has been continuously recognized by the U.S. Department of Education (the Department) as a reliable authority on quality education since 1967, it goes without saying that our Commission is committed to the important role that accreditation plays in advancing quality education for students and in fulfilling its role as a gatekeeper to help ensure the continued integrity of the Title IV federal student financial aid programs. Accordingly, ACCSC expresses its full support of NACIQI's recommendation to **retain accreditation** in the institutional eligibility process. Additionally, ACCSC finds itself in agreement with many of the positions taken by NACIQI in the final draft report, including:

- The accreditation system serves as a critical element in providing information about academic quality to satisfy the federal interest in assuring the appropriate use of federal funds;
- Accreditors are the most experienced source of information about academic quality and should continue to establish and assure consistency with academic quality standards in the determination of eligibility; and
- There is value in sustaining the determination of quality as a non-government function.

On this last point, ACCSC believes that on matters of academic quality assessment, federal intervention into the relationship between accreditors and institutions should be minimal. However, it appears that despite NACIQI's recognition of the value of "determining quality as a non-government function," many of the recommendations advanced in this draft final report leave the impression that the federal government should play a more significant and distinct role in the design of accreditation. Instead of increasing governmental involvement in the accreditation process, ACCSC suggests that NACIQI focus its recommendations on the need for continued discussion regarding the relationship between the triad members and on a common set of definition of terms (not metrics) related to success and outcomes, a more efficient and coordinated set of disclosure requirements for institutions, and better understanding of the accreditors' current role in evaluating such information (Recommendations 16-20). ACCSC looks forward to being involved in those discussion areas.

In order to maintain the integrity of accreditation, accreditors, as the most experienced source of information on academic quality, must be given ample trust to establish and enforce the standards and practices that best align

with the institutions they serve. As NACIQI keenly observed in its draft report, accreditation attracts and deploys extraordinary academic talent in the service of quality assurance. Although ACCSC recognizes that accreditation has room for enhancement and improvement, the Commission also believes that accreditation can be strengthened while retaining the positive qualities and the expertise that peer-review captures without federally mandated intervention into accreditation affairs. This sentiment seemed to resonate with NACIQI when noting that, “[w]hile some may consider that accreditation has not been sufficiently publicly accountable, it is notable that, as a function of its engagement in the federal aid eligibility process, the accreditation system has moved in the direction of greater accountability...”

With respect to the recommendations captured in the NACIQI draft final report, ACCSC agrees that it is prudent not only to clarify and articulate common understandings about the responsibilities of each member of the triad (federal, state and accreditor), but also recognizes that by increasing communication, there is an opportunity to better understand the responsibilities and common concerns of each member of the triad (Recommendations 1 & 2). In a number of different instances, the current Criteria for Recognition of Accrediting Agencies under 34 CFR Part 602, which are statutorily mandated under Section 496 of the Higher Education Act, reinforce these shared gate-keeping responsibilities by requiring communication and collaboration among the triad partners. For example, accrediting agencies are required to inform the states, the Department, other accrediting agencies, and the public when an institution receives accreditation, is placed on probation, or has accreditation denied or withdrawn (34 CFR §602.26). In addition, accrediting agencies are expected to take into account the decisions of states and other accrediting agencies in their own decision-making (34 CFR Section §602.28) and to cooperate with the states and the Department whenever an institution or program closes and students need assistance in continuing their education (34 CFR §602.24(c)(3)). The point here is that the oversight of higher education as set forth in current law and regulation is a shared responsibility and each member of the regulatory triad has an essential role to play in the oversight of institutions. Thus, a more clear set of expectations for each member of the triad in the minds of all stakeholders and policymakers is essential as we move forward.

With regard to NACIQI’s stated goal of developing models for triad articulation and to promote greater engagement and consistency across states (Recommendation 5), ACCSC agrees that increased coordination amongst the members of the triad, particularly between accreditors and states, could result in a reduction of the unnecessary duplication of effort without impacting the quality assurance mechanisms currently in place. Several states have implemented, or are considering, “licensure by means of accreditation” on some scale. For example, in Florida, license by means of accreditation was included in the statutory amendments approved by the Florida Legislature in 2002. Qualifying institutions, which are accredited by accrediting agencies that have been approved by the state Commission for Independent Education (and recognized by the Department), are granted state licenses which are valid for the same period as their current grant of accreditation. This process has worked exceedingly well and ACCSC believes that state use of accreditation to fulfill licensure requirements has freed up significant resources at the state level without sacrificing the emphasis on educational quality. By partnering with accreditation in this capacity, states have reduced duplicative efforts in the licensure process and have had more opportunities to engage in consumer protection functions (Recommendation 3) and the accountability of institutions and programs providing education within the state (Recommendation 7).

ACCSC also shares NACIQI’s focus on accountability and stated belief that accreditors accept the responsibility of demonstrating adequate rigor in accountability to assure that all accredited institutions meet reasonable standards of educational performance, and that accreditors must ensure that unacceptably weak institutions are not eligible for student aid. Additionally, ACCSC believes that NACIQI, whose primary function is to provide recommendations to the Secretary concerning whether an accrediting agency’s standards are sufficiently rigorous and effective in their application, can also reinforce the critical role of accreditation by helping to ensure that unacceptably weak accrediting entities are not recognized by the Secretary.

ACCSC believes that all accrediting agencies must continually evolve and explore opportunities to improve. As such, ACCSC is interested in further discussion regarding systems for expedited review (Recommendation 11), streamlining approval processes, as well as to offer more gradations in accreditation decisions (Recommendation 12). As mentioned above, ACCSC supports the need for a community discussion regarding how institutional disclosure of data might be better and more efficiently collected, reported and evaluated. While NACIQI mentions the need for greater transparency, those concepts could not be implemented without resolution regarding the definition of terms used for disclosure. For example, ACCSC cautions NACIQI to take into account that transparency of accountability measures such as graduation rates are only useful when there is uniformity in the data reported. As it is now, accreditors, institutions, and the federal government define metrics for graduation rates in such disparate ways that requiring institutions to disclose this information would only lead to greater confusion and be counterproductive to NACIQI's policy aims.

In conclusion, ACCSC is keenly aware of the important role that accreditation plays as a gate-keeping entity in the triad and the impact that that role has on ensuring the reliability of our nation's current higher education oversight system. ACCSC looks forward to continuing the dialogue with NACIQI and future opportunities to strengthen accreditation and the validity and reliability accreditation is intended to convey regarding education quality, as well as to ensure that accreditation continues to fulfill its role as a gatekeeper of the Title IV federal student financial aid programs.

Respectfully submitted,

Michale S. McComis  
Executive Director  
ACCSC

## ASSOCIATION OF AMERICAN UNIVERSITIES

*The Association of American Universities (AAU) submits the following comments on the National Advisory Committee on Institutional Quality and Integrity (NACIQI) final discussion draft, Higher Education Accreditation Reauthorization Policy Recommendations.*

The AAU appreciates the opportunity to provide its fourth set of comments to NACIQI as these important discussions about the future of accreditation continue, particularly in advance of the 2013 reauthorization of the Higher Education Act. We look forward to a continuing dialogue as the committee prepares its report to Secretary Arne Duncan. We hope that the Department of Education takes the final report under serious consideration in developing its reauthorization recommendations to the Congress.

The final discussion draft contains a number of recommendations for reform supported by AAU. Our comments will highlight the recommendations that we support.

First, AAU strongly supports the draft report's recommendation to retain the linkage between accreditation and eligibility for federal funds. The discussion draft correctly notes that although this service was not envisioned in the original formation of non-governmental accrediting agencies, eligibility for federal student aid should be linked to assessments of academic quality, and accreditors are the appropriate agencies to carry out such assessments. The discussion draft captures this critical issue clearly and cogently:

“There is value in sustaining the determination of quality as a non-governmental function. In this, we note that a strength of American higher education has been its freedom from federal determination of institutional quality and self-improvement processes. The responsibility for evaluating how well an institution is accomplishing its educational work can and should rest exclusively with the institutions and/or the accrediting bodies.”

AAU supports recommendation 9 to encourage a dialogue within the accreditation community about the structure and organization of the accreditation enterprise. As stated in the report, “The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector or other educationally relevant variable, than with geography. This dialogue may also afford institutions greater opportunity to choose among accreditors.” We believe that the system of accreditation should provide differential treatment of institutions based on differing missions and varying levels of quality and stability. Accreditation should not be granted to those institutions that do not meet basic fiscal and operational thresholds; institutions that surpass those thresholds should be assessed in the context of their missions.

AAU supports recommendations 10 and 11 to encourage accreditors to differentiate the levels and durations of institutional reviews based on varying degrees of demonstrable quality and stability, and encourage accreditors to design systems for expedited review of institutions with longstanding records of strong performance.

AAU supports recommendation 13 to conduct a more comprehensive cost-benefit analysis of the current accreditation process to make existing statutory and regulatory provisions, where possible, less intrusive, prescriptive, costly, and granular, while maintaining the essential quality controls of gatekeeping. Informal surveys of AAU institutions show that reviews over the last decade have become increasingly intrusive and time-consuming. AAU believes that it is very important to avoid drifting into a system in which the cost of data collection and reporting requirements outstrip their benefits.

Related to recommendation 13, AAU supports the general intent of recommendations 14 through 18 to reconsider data that are collected by all accreditation, state, and federal agencies. In this reconsideration, the costs of data collection should be evaluated relative to its utility and appropriate use. We support the language in recommendation 17 encouraging the development of data on reliable, valid outcome measures such as completion/graduate rates, while avoiding specification of student learning outcome measures or the application of uniform thresholds applied across all institutions. Regional accreditors should work with institutions to develop meaningful assessment tools that evaluate student achievement or success according to their own mission and student body.

As part of the consideration of data in the accreditation process, AAU supports recommendation 19 and 20 to consider new or improved systems of data collections that maintain data integrity and protect individual anonymity, as well as to examine ways to make the Integrated Postsecondary Education Data System (IPEDS) more accurate, timely, and useful.

Lastly, while the final draft recommends that the federal role in accreditation focus on the evaluation of financial stability/compliance data and quality considerations, we look forward to future discussions with the Department of Education about the definition of, and responsibility for, assessing academic quality. AAU recommends that the federal role in accreditation focus on financial integrity and stability and on regulatory compliance, while accreditors focus on the non-governmental role of evaluating academic programs and facilitating program quality improvement through accreditation's peer review evaluation process. In their respective roles, the federal government and accreditors can effectively complement each other in curbing fraud and abuse and cracking down on degree mills, an issue that the Department of Education and broader academic community will have to address in coming months.

Again, AAU appreciates the opportunity to provide additional input and looks forward to ongoing discussions with the NACIQI and the Department of Education on the future of accreditation.

# ASSOCIATION OF PRIVATE SECTOR COLLEGES AND UNIVERSITIES

March 16, 2012

Ms. Carol Griffiths  
Acting Executive Director  
NACIQI  
US Department of Education  
1990 K Street NW; Room 8073  
Washington, DC

Via email: [accreditationcommittees@ed.gov](mailto:accreditationcommittees@ed.gov)

Dear Ms. Griffiths:

On behalf of the members of the Association of Private Sector Colleges and Universities (APSCU), I thank you for this opportunity to comment on NACIQI's Higher Education Accreditation Reauthorization Policy Recommendations, issued February 8, 2012.

APSCU member institutions run the postsecondary gamut, educating students at every level from certificate to degree to postbaccalaureate professional credentials. Our member colleges are accredited by regional, national, specialized, and/or programmatic accreditors.

APSCU supports NACIQI's recommendation that accreditation retain the role of gatekeeper for institutional eligibility for federal financial aid programs. The triad consisting of accreditors, Federal, and state oversight is tried-and-true and has served the American postsecondary education system well. Accreditors ensure that the education provided by the institutions of higher education under their purview meets acceptable levels of quality according to evaluation criteria set by the organization, and peer evaluations to assess whether or not those criteria are met.

As non-governmental agencies using a self-regulatory peer review process, accreditors are uniquely situated to analyze institutions' ability to perform the task all colleges undertake: educating students. Additionally, accrediting agencies grow and change as the postsecondary landscape grows and changes. The continuity of the oversight brought by accreditors is a valuable tool for assessing the continued growth of institutions and postsecondary quality. As postsecondary education has grown and evolved, so have the institutions accreditors are charged with overseeing. Accrediting agencies have adapted over time to accommodate the changing postsecondary landscape, and they will continue to do so into the future.

APSCU agrees with items 1 and 2 of NACIQI's recommendations. Clarifying and articulating common understandings about the responsibilities of each member of the triad and increasing coordination among the federal government, states, and accreditors would reduce burden on institutions by preventing unnecessary duplication of effort while maintaining oversight of postsecondary education sufficient to protect federal funds and students. Some overlap of function is inevitable and even necessary; however, each entity involved in the triad also serves a unique function in the process of postsecondary oversight. Allowing each body to concentrate on its area of expertise and authority will allow safeguards to remain without stifling innovation in education.

APSCU supports NACIQI's recommendation 10 that accreditors be afforded greater opportunity to distinguish among applicants with more varied levels and durations of review; recommendation 11 that accreditors be given greater opportunity and encouragement to design systems for expedited review; and number 12 giving accreditors greater opportunity to offer more gradations in their accreditation decisions. By allowing accreditors this type of flexibility based on the performance of individual institutions, those colleges with a track record of educational quality with an accreditor would be able to undergo a more expedited review process, saving both college and the accrediting agency resources. Conversely, accreditors could focus more time and attention on institutions that would benefit from additional attentiveness.

The NACIQI recommendation of modifying the existing statutory and regulatory criteria and their application to make them less intrusive, prescriptive, costly, and granular, where possible, while maintaining the essential quality controls of gatekeeping (recommendation 13) is supported by APSCU. Clarity in regulation and statute is in the best interest of all involved parties. Overly prescriptive federal rules applied broadly across agencies do not serve the best interest of students or institutions. Accrediting agencies should have the flexibility to create and enforce standards that best suit the institutions they oversee.

APSCU believes timely, quality data is the best tool available for decision makers – institutional, accrediting agencies, state regulatory bodies, or the federal government – to create effective policy. Therefore, we support NACIQI's recommendations 14 and 16 regarding data. The amount of information institutions collect and report is enormous, and creates a time and cost burden. Data that are collected should be relevant, informative, and – most importantly – utilized. Collecting data simply because it has been collected for 20 years when it is not used for consumer information or relevant policymaking is nonsensical. The amount and types of data collected by the federal government about accreditation, from institutions and accrediting agencies, should be examined and streamlined.

We agree that accurate and informative data does not necessarily require uniform thresholds applied across accreditors and institutions even when consistent data points are collected. Instead, thresholds should reflect the diversity of postsecondary education and the agencies that accredit colleges and programs, and the student populations being served at those institutions.

Finally, we appreciate the role NACIQI has as a federal advisory body. The accrediting bodies NACIQI reviews are as diverse as the institutions those agencies oversee. We believe NACIQI's role as an impartial party making recommendations to the Secretary about the accreditation agencies that

eventually oversee postsecondary education is an important part of the overall accreditation process. We appreciate NACIQI's work, and encourage the Secretary and Committee to continue to include representation from all sectors of education in its membership.

Thank you again for this opportunity to comment on NACIQI's reauthorization policy recommendations. Please feel free to contact me if you have any questions or would like additional information. I can be reached at 202-336-6817 or via email at [Brian.Moran@apscu.org](mailto:Brian.Moran@apscu.org).

Sincerely,

Brian Moran  
Executive Vice President of Government Relations  
and General Counsel  
The Association of Private Sector Colleges and Universities

# ASSOCIATION OF PUBLIC AND LAND-GRANT UNIVERSITIES

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
U.S. Department of Education  
Office of Postsecondary Education  
1990 K St., NW, Room 8073  
Washington, DC 20006

Dear NACIQI Committee Members:

The Association of Public and Land-grant Universities (A·P·L·U) appreciates this opportunity to comment on the Draft Final Report of the subcommittee tasked with crafting recommendations to the Secretary of Education with respect to possible changes in accreditation in the next reauthorization of the Higher Education Act (HEA). With 185 member institutions, A·P·L·U represents the nation's public research and land-grant institutions, including the historically black land-grant institutions as well as tribal colleges and universities.

We applaud the subcommittee for examining and raising a number of issues with respect to accreditation, a key factor in maintaining and improving the quality of American higher education. We would like to take this opportunity to highlight the following items and recommendations in the draft final report.

A·P·L·U is heartened by the subcommittee's overall recommendation that the link between institutional accreditation and institutional eligibility for federal Title IV funds be maintained. Because the federal government is paying for quality higher education, and not a consumer product, we believe some validation of institutional academic quality is essential, and accreditation plays a vital role in that process. We support this reaffirmation of the linkage. At the same time, we reiterate our past position that accreditation cannot serve as the sole gate-keeping mechanism; enforcement of federal and state statutes and regulations must be the purview of federal and state governments. In this context, we are very much in agreement with Recommendation #1: Clarify and articulate common understandings about the responsibilities of each member of the triad.

The Draft Final Report contains 25 separate recommendations. A·P·L·U is intrigued by a number of them, especially with respect to the potential implications of their implementation. For example:

- Recommendation #10: Allow accrediting agencies and the federal government to distinguish among applicants to allow for greater scrutiny of those that present greater potential cause for concern, without promoting discrimination.

APLU agrees with this recommendation. We also believe that more aggressive steps must be taken by all to promote and bring about better stewardship of federal financial resources. At the same time, we would be interested in learning more about how such a structure might be devised, as the right balance must be achieved.

- Recommendation #11: Encourage accreditors the opportunity to allow for expedited reviews.

Given the limited resources available to all, APLU agrees with the notion of focusing the majority of the attention to where it is most likely needed. Related to our thoughts on Recommendation #10, we are curious as to which group of institutions would be eligible for an expedited review.

- Recommendation #12: Allow accreditors to offer more gradations in their accreditation decisions.

In our view, one of the difficulties in the current federal Title IV eligibility structure is its all-or-nothing nature: an institution is either completely eligible or completely ineligible for federal funds, making the decision to cut off aid to low-quality institutions politically difficult. This system could allow institutions of questionable quality to become the primary focus of federal attention.

We would argue that “gradations” in accreditation could be potentially linked to “gradations” in an institution’s eligibility for federal funds. The questions, once again, surround how such a system would be designed and implemented.

- Recommendation #25: Consider allowing NACIQI to offer gradations with respect to the recognition of accrediting agencies.

While the current recognition process is not an all-or-nothing proposition, there may be a benefit to a set of discussions about the potential benefits of a recognition system with greater levels of gradations. A myriad of questions arise about the design and implementation of such a system. For example, what specifically does less than full recognition of an accrediting agency imply? Would it limit the number of schools that might be accredited?

- Recommendation #9: Consider a possible shift from a regionally-based accreditation system to a mission- or sector-based structure.

Many in higher education would welcome such a move. APLU believes that, while such a transformation could have benefits, there are also potential unintended consequences to be explored. For example, a set of similar schools might ultimately set the agenda for the agency responsible for accrediting them. In other words, could such a shift to sector-based structure create the proverbial situation in which “the fox is guarding the henhouse”?

This is not to say that a series of discussions would be fruitless. To the contrary, such a conversation may be very productive. Like the other comments we offer with respect to the recommendations listed above, APLU believes that a number of important questions must be addressed.

APLU thanks NACIQI for the opportunity to offer our thoughts on the subcommittee’s Draft Final Report on possible changes to accreditation in the next reauthorization of the HEA. We look forward to remaining engaged in the process.

Sincerely,

Peter McPherson  
President

# ASSOCIATION OF SPECIALIZED AND PROFESSIONAL ACCREDITORS

March 13, 2012

National Advisory Committee on Institutional Quality and Integrity  
U.S. Department of Education, Office of Postsecondary Education  
1990 K Street NW., Room 8060  
Washington, DC 20006

Dear Committee Members,

The Association of Specialized and Professional Accreditors (ASPA) appreciates the opportunity to submit commentary on the NACIQI Draft Final Report: Higher Education Accreditation Reauthorization Policy Recommendations February 8, 2012. ASPA provides a collaborative forum and a collective voice for the community of accreditors engaged in quality assurance of specialized and professional higher education programs, schools and in some cases single purpose institutions. With approximately 60 members, we are the largest association of accreditors. Thirty-three of our members are recognized by the U.S. Department of Education.

We commend the introductory sections of the report that recognize and affirm several longstanding principles of accreditation and higher education - including freedom from federal determination of institutional quality and self-improvement processes in favor of reliance on institutions and accrediting bodies in the evaluation of how well an institution is accomplishing its educational work. These principles are also among those stated and affirmed in current law delineating specific distributions of powers and responsibilities among institutions, accreditors, and the Department under Title IV.

However, the values and philosophies of the principles espoused in the opening sections do not appear to be reinforced throughout the document as the ensuing recommendations are contradictory and incompatible. Were many of the recommendations to be operationalized, they would erode understanding and use of the principles as the basis for policy and decision making. They would harm higher education.

Regarding recommendations concerning the Triad, ASPA would encourage the Department in assuming a convening role to promote engagement and collaboration among the three members. In so doing, the three constituents should come together as equals with a common goal of educational quality and protection of citizens. However, subsequent recommendations undercut the triad concept and the statutory principles on which it rests by proposing federally directed coordination and consistency. This and other "one-size-fits all" concepts are inconsistent with the "freedom from federal determination" principle of the opening paragraphs. Such concepts are also inconsistent with the report's rhetorical support for educational diversity and innovation.

When discussing the role and scope of accreditors, NACIQI recognizes that the peer review process of accreditation is appropriate to the development and improvement of programs and institutions. It is troubling to then see recommendations about restructuring the non-governmental accreditation system in a manner that takes ownership of the academic enterprise in the hands of the federal government. Accrediting agencies

assign peer reviewers to specific institutions based on mission, scope, curricular offerings, levels of instruction and so forth; it is puzzling to see this recommendation in a document intended to advise about future federal legislation.

The report's recommendations concerning flexibility and nuance in the review process are already possible and that flexibility is used to varying degrees by accreditors. It is therefore not clear why this would be included in the report. The recommendation concerning similar flexibility in recognition determinations is of interest to accreditors, especially in view of the limitations of the current system.

Modifying existing statutory and regulatory criteria to make them less intrusive, prescriptive, costly and granular is another concept that ASPA endorses. It is unclear however who will determine the regulatory burden and this idea is contradicted by the previous prescriptions for how the states and accreditors should function. This carries over into the several recommendations related to data – specifying how and what is collected moves in the direction of increased federal intrusion and over-regulation. A specific set of data does not reflect diversity in professions, and in outcomes as appropriate to individual missions.

ASPA agrees that students should be able to make informed decisions and have access to data that will assist in that process. Making accreditation reports about institutions available to the public is a concept that should be approached with due caution. Reports in the public domain are frozen in time, making them a source of misrepresentation within a year. The requirement that a review conducted at one point in time remain public may reduce the willingness for programs and institutions to be as forthcoming as the current accreditation process affords. Institutions should be given the opportunity to implement corrections that have no bearing on student decisions, without the worry of public reports providing an opportunity for consumers to draw invalid conclusions. We support efforts to find approaches to data and information sharing that address multiple needs. However, ASPA is concerned about further federal regulation in this area because the power to regulate what must be disclosed becomes the power to regulate what must be done, a power that opens the way to intrusions into academic decision making. Again, such a result would be inconsistent with the principles articulated in the opening of the report.

Overall, the report appears to recommend a consolidation of federal control of higher education accreditation in the Department while positing significantly more power for decisions on recognition and policy to NACIQI. It is valuable to have an advisory group such as NACIQI that can make recommendations on recognition that are separate and distinct from those of the staff. Having NACIQI ask accreditors to report on the performance of the universe of accredited institutions/programs reads as though NACIQI seeks powers to make judgments about overall quality, and in the case of the professions, do so without knowledge of various specific fields. Such a recommendation invites immediate and long-term intrusion into academic decision making and broad brush image creation that is inconsistent with institutional independence and system diversity.

In summary, if the introductory concepts of the report were enhanced by supported recommendations, the result would strengthen higher education and accreditation. We encourage NACIQI to re-evaluate the troubling recommendations as identified. Thank you for your attention to our concerns.

Sincerely,

Joseph Vibert  
Executive Director

## **BERNARD FRYSHMAN**

**Bernard Fryshman, Ph.D.**  
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**March 15, 2012**

Carol Griffiths, Executive Director  
National Advisory Committee on  
Institutional Quality and Integrity  
1990 K Street, NW - Room 8073  
Washington, DC 20006

Dear Ms. Griffiths:

I am writing to thank you for the opportunity to comment on the NACIQI draft final report. I had wanted to offer oral comments during the meeting, however the meeting date, Friday April 13, 2012 is a Jewish Holy Day.

I hope you will be able to convey to the members of NACIQI how much I appreciate the time and effort they devoted to preparing this report. In particular, higher education was well served by the several drafts, and by the structured document now before us.

I am submitting the enclosed comments for the record and if some future opportunity to be heard presents itself, I will be happy to come to Washington for this purpose.

Sincerely,

Bernard Fryshman, Ph.D.

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March 15, 2012

Written Comments regarding the draft final report on the reauthorization of the HEA

Page 1

**NACIQI Report: (Paragraph 2):** "... well educated citizenry promotes individual and community well-being, economic competitiveness and workforce development, and civic participation."

*Comment: Learning and scholarship have value for their own sake, and the NACIQI Report should say so.*

**NACIQI Report: (Paragraph 2):** "There is confusion and incomplete overlap about 'compliance with regulation' versus 'accreditation via peer review'."

*Comment: It is not clear what this sentence means. Accreditation by peer review is completely independent of "compliance with regulation. "These are two different issues.*

**NACIQI Report: (Paragraph 3):** "We considered a diverse range of topics in our deliberations and benefited from comments from federal and state actors, from accreditors ..."

*Comment: The manner in 'which presenters were selected was skewed, and there was no opportunity for knowledgeable members of the audience to interact with presenters and help NACIQI members develop a more complete understanding of the issues involved. A three minute opportunity to comment was entirely inadequate to react to two days of hearings. In general the members of NACIQI did not benefit from broad based discussion and a balanced presentation.*

Page 3

**NACIQI Report: (Paragraph 1):** "While some may consider accreditation has not been sufficiently, publicly accountable ..."

*Comment: Public accountability is not a responsibility for accreditation, per se. The Department of Education can, of course, require that recognized accrediting agencies be accountable to the public, but it must first clearly define what it means by accountability.*

**NACIQI Report: (Paragraph 1):** "... a portion of accreditation commissioners be members of the public."

***Comment:** As written the report does not take note of the fact that a member of the public who is a commissioner does not necessarily represent any significant portion of the public, and sometimes mitigates against the effectiveness of the accreditation process. Before making any further recommendations in this direction NACIQI should seek to gather the experience of accreditors over the past few years.*

Page 4

**NACIQI Report: (Recommendation 5):** Draw on the convening capacity and function of the federal level to develop models for triad articulation and to promote greater engagement and consistency across states.

***Comment:** The Department may, appropriately, develop models for triad articulation, but it is not the role of the United States Department of Education to promote "greater engagement and consistency across states." In general, NACIQI must exercise great care to prevent a .Ministry mindset from taking root.*

**NACIQI Report: (Recommendation 6):** "Evaluate whether the diversity of state regulation across the country might be shaped to incorporate recognition of the growth of cross-state (and, indeed, cross nation) educational activity."

***Comment:** I feel that the diversity of state regulation is consistent with a healthy regulatory environment. Each state is the best judge of its educational needs and the guidelines under which institutions should function.*

Page 5

**NACIQI Report: (Recommendation 9):** Encourage a dialogue within the accreditation community about the structure and organization of the accreditation enterprise. The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector other educationally relevant variable, than with geography. This dialogue may also afford institutions greater opportunity to choose among accreditors.

***Comment:** Other than the regionals, accreditation is largely aligned with mission and sector. At the same time, regional accreditation has been extremely effective in promoting and protecting the quality of American Higher Education. Any change should be preceded by careful experimentation, with protocols designed to scientific standards.*

Page 6

**NACIQI Report: (Paragraph 2):** "Taken as a whole, the accreditation process should be measured by reasonable cost-benefit standards ..."

***Comment:** The words 'accreditation process' should be changed to 'recognition process'. It is appropriate for the Department of Education to examine its recognition process against reasonable cost benefits standards. It is not appropriate for the Department to inject itself into the accreditation process, however indirectly.*

**NACIQI Report: (Recommendation 14):** Reconsider data that are collected by all accreditation, state, and federal agencies. In this reconsideration, evaluate the cost of data collection relative to its utility and appropriate use.

*Comment: I strongly support this recommendation and would only add that every data element should be accompanied by a sunset provision.*

Page 7

**NACIQI Report: (Recommendation 16 (1)):** From the above reconsideration of data, costs and benefits, define a specific set of data that is needed as a minimum to address (a) federal interest and/or (b) institutional improvement. This would entail:

(1) Developing a set of consistent definitions and appropriate metrics for use in the accreditation process. Achieving convergence of agreement about definitions may without altering the state regulatory authority or interest - assist states in becoming more aligned in their regulations and thereby provide institutions whose activity crosses borders with fewer divergent data demands.

*Comment: A Ministry of Education mindset is evident here. Government may define metrics for its own use, but not impose them on accreditation. Accreditation must be free to use strategies that work for it, unimpeded by government.*

(2) Insuring that this data is accurate and meaningful, and consistent across institutions, without specifying minimum thresholds to be applied across all institutions. All data requirements should account for distance education modalities.

*Comment: Where there is a federal interest the Department of Education is free to seek data from institutions directly. Amassing data for "institutional improvement", on the other hand, by gathering it through accreditation organizations, is an example of the improper use of the recognition function. Recognition should not be used as a lever to enable government intrusion into higher education. As an aside, the Department of Education is not in a position to judge, or to dictate "institutional improvement".*

(3) The specific set of minimum data would not preclude accreditors from requiring data appropriate for their philosophy and specialty. Accrediting agencies can and should consider what additional data is needed for the function of continuous institutional improvements. However, additional requirement for data collection should be developed with an assessment of its burdens and sufficient lead time for the data to be compiled.

*Comment: There should not be a "specific set of minimum data n.*

**NACIQI Report (Recommendation 17):** "A data set with common definitions might beneficially include data on such outcomes as completion/graduation, licensure or job placement (where appropriate), and/or other indices of career progress. Note that this consideration does not include specification of student learning outcome measures, nor of uniform thresholds on any measure to be applied across all institutions."

*Comment: As noted earlier, Scholarship and Learning have value in and of themselves. "Indices of career progress" impose an occupational character on postsecondary education which is limiting.*

**NACIQI Report (Paragraph 1):** "To address the concern about lack of transparency in the accreditation process, data collected for accreditation by accrediting agencies should be available to the public by both the institution and the accrediting agency in a format that is consistent, meaningful, and perhaps prescribed."

***Comment:** The accreditation process depends on an institution's willingness to be frank and open about its strengths and limitations. It also depends on site visitors not writing defensively. Finally, there is no evidence whatever that the public is served by an excess of often irrelevant data. The implications of this paragraph as well as recommendations 21 and 22 could seriously compromise the effectiveness of accreditation. Structured experiments with scientifically designed protocols as well as small pilot projects must be carried out before any recommendations can be made.*

## **BUNKER HILL COMMUNITY COLLEGE**

**From:** Mary L. Fifield [mailto:mfifield@bhcc.mass.edu]

**Sent:** Friday, March 16, 2012 1:23 PM

**To:** Accreditation Committees

**Cc:** Wilkins, Lorrie D

**Subject:** Written Comments regarding the draft report on the reauthorization of the HEA

Dear Committee Members,

The purpose of this correspondence is to provide comment on the portion of the Higher Education Accreditation Reauthorization report that proposes a system of accreditation based on sector or mission rather than region.

Further, I wish to offer my opinion about permitting institutions to choose among accreditors.

It is my belief that regional accreditation has several advantages. First, it helps students transfer easier when institutions within one geographic region share the same accreditor. In addition, regional accreditation is much less costly for institutions and also encourages more workshops and sharing of best practices because the costs can be kept low.

With respect to permitting institutions to choose accreditors outside of regions, some of the same cost issues apply.

It will be more expensive for institutions to fund evaluators who could potentially come from across the country. Similarly, regional accrediting bodies will incur more costs to manage a cross country system that will probably lead to the need for increased staffing.

I appreciate the work of the NACIQI and hope that you will take my views into consideration as you finalize the report.

I have served as a Commissioner and evaluator for the New England region, as well as the North Central region when I lived in the midwest and the Middle States region when I lived in Pennsylvania.

Thank you for your attention to my comments.

Sincerely,

Mary L. Fifield  
President  
Bunker Hill Community College  
Boston, Massachusetts

## CAPITAL COMMUNITY COLLEGE

**From:** Nieves, Wilfredo [mailto:WNieves@ccc.commnet.edu]

**Sent:** Friday, March 16, 2012 10:58 AM

**To:** Accreditation Committees

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

To the Members of the National Advisory Committee on Institutional Quality and Integrity (NACIQI):

Thank you for the opportunity to review and comment on the final draft of NACIQI's report including recommendations being submitted to the Secretary of Education. I believe the report and recommendations address the important issues of educational quality, accountability and the role and interaction of three critical sectors: federal, state and accreditor. The intent of the report and its recommendations will provide the Secretary guidance and direction to strengthen and enhance systems that will lead to stronger and more clear process institutional quality and integrity for higher education.

Please note that while I support the report overall, I believe the area of the report that proposes a system of accreditation based not on region, but on sector or mission and entertains the idea of allowing institutions to choose among accreditor will not strengthen the process or necessarily lead to the objectives being sought. My experience and observations in higher education indicate that the regional system of accreditation provides:

- An easier and less expensive for institutions to be involved and informed about accreditation;
- Is helpful for students transferring or for students who wish to advance to the higher degree;
- Promotes the sharing of good practice through team visits, conferences and workshops – all at a reasonable cost;
- Allows accreditors to deal with a manageable number of states and institutions.

I am concerned that allowing institutions to choose accreditors across regions will:

- Weaken peer review through increased travel or lack of boundary-crossing;
- Increase the cost to institutions for travel and for the overhead required by accreditors to deal with institutions from up to 50 states;
- Increase staffing needs of accreditors to manage increased state relations and account for greater distances to visit member institutions.

Thank you for your attention to this matter and your efforts to work on behalf of our students and institutions

Sincerely,

Wilfredo Nieves  
President

# CARRINGTON COLLEGE – CALIFORNIA

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
Office of Postsecondary Education  
U.S. Department of Education  
1990 K Street NW, Room 8073  
Washington, DC 20006

To Whom It May Concern,

Thank you for this opportunity to comment on the National Advisory Committee on Institutional Quality and Integrity's (NACIQI's) draft report on the reauthorization of the Higher Education Act. With 9 campuses in California and 10 programs offered in the online modality, Carrington College California is in a unique position to provide a valuable perspective on regulatory issues affecting the U.S.

On behalf of my institution, I commend the members of NACIQI for striving to bring clarity to the very complex issues we are facing in regulating higher education in the twenty-first century. I would like to address a few of the specific recommendations in the narrative below.

- Recommendations 1-7 address the potential benefits of increased communication among regulators and the importance of clarifying regulatory roles, including state agency responsibility for consumer protection. Carrington College California is supportive of increased communication among regulators, especially communication which would decrease duplication, identify gaps, and ensure appropriate consumer protection for students. The Department of Education is in a position to provide a federal venue for both state and accrediting agencies to convene. The federal government is also in a position to foster inter-state collaboration for minimum, if not uniform, state standards for authorization to operate, and for program approval. It is imperative that federal, state, and accrediting agencies set realistic expectations for feasible regulatory activity within current budget constraints.
- Recommendation 10 touches on the benefits of "varied levels and durations of [accreditation] review." We are pleased to see that NACIQI supports efforts already underway at one regional accrediting agency, the Higher Learning Commission (HLC) of the North Central Association of Colleges and Schools. HLC is currently working to implement a new Pathways model for seeking and maintaining accreditation. The Pathways model allows different levels of reporting requirements for schools at different stages in their operations and continuous improvement efforts. However, it is important to ensure that all institutions are ultimately held to the same set of standards, regardless of size, type, or tax status.
- Recommendations 12 and 25 target gradations in accreditation decisions about institutions and NACIQI decisions about accreditors. This suggestion gives us pause, as we suspect it will prove complicated and confusing, lacking true public benefit, in addition to watering down the reputations of institutions that would receive the highest rank. Further, accredited institutions would be affected in a

complicated and publicly confusing manner, both by the grade granted by the accreditor, and by the accreditor's grade granted by NACIQI.

- Recommendation 14 suggests reviewing data collection while considering costs relative to utility and appropriate use. We believe all higher education institutions would be in favor of such a review. Our current reporting requirements have become extensive, burdensome, inconsistent, and often redundant. We hope the Committee will further pursue this recommendation.
- Recommendation 16 relates to the development of consistent definitions and metrics, consideration of the distance education modality in data requirements, and the requirement of additional data with great consideration for the related burdens and time constraints. There is considerable momentum for new consistency in definitions and metrics. We encourage the Committee to champion widespread acceptance of the Common Education Data Standards supported by the National Center for Education Statistics. We fully support pursuing additional commonality across higher education in the U.S. as these efforts continue. Distance education modalities are already being incorporated into current data requirements, including recent additions to the Department of Education's Integrated Postsecondary Education Data System (IPEDS). While accrediting agencies have valid reasons for requesting data beyond that required by state and federal agencies, there is general consensus in the higher education community that thoughtful consideration must be given to the need for and the burden of such additional data collection.
- Recommendation 19 raises the controversial topic of national student unit record systems, which would help us overcome many student data obstacles. The Committee is right to focus first on how to overcome the privacy issue. This would allow states and institutions to proceed with a more effective and efficient tracking system for student success, including easier access to federal data across the triad.
- Recommendation 21 deals with increased transparency with accreditor decisions and reports. Carrington College California advocates for transparency, which is paramount to a true public understanding of the oversight process. We ask the committee to continue this discussion in ensuring that the materials accreditors and institutions would be required to publish demonstrate a thoughtful balance between helpful context and saturating detail.

Again, thank you for this opportunity to provide feedback on NACIQI's latest draft report of recommendations on the reauthorization of the Higher Education Act.

Sincerely,

Jeff Akens  
President, Carrington College California

# CARRINGTON COLLEGE

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
Office of Postsecondary Education  
U.S. Department of Education  
1990 K Street NW, Room 8073  
Washington, DC 20006

To Whom It May Concern,

Thank you for this opportunity to comment on the National Advisory Committee on Institutional Quality and Integrity's (NACIQI's) draft report on the reauthorization of the Higher Education Act. With 11 campuses in Arizona, Idaho, New Mexico, Nevada, Oregon, Texas and Washington State, Carrington College is in a unique position to provide a valuable perspective on regulatory issues affecting the U.S.

On behalf of my institution, I commend the members of NACIQI for striving to bring clarity to the very complex issues we are facing in regulating higher education in the twenty-first century. I would like to address a few of the specific recommendations in the narrative below.

- Recommendations 1-7 address the potential benefits of increased communication among regulators and the importance of clarifying regulatory roles, including state agency responsibility for consumer protection. Carrington College is supportive of increased communication among regulators, especially communication which would decrease duplication, identify gaps, and ensure appropriate consumer protection for students. The Department of Education is in a position to provide a federal venue for both state and accrediting agencies to convene. The federal government is also in a position to foster inter-state collaboration for minimum state standards for authorization to operate. It is imperative that federal, state, and accrediting agencies set realistic expectations for feasible regulatory activity within current budget constraints.
- Recommendation 10 touches on the benefits of "varied levels and durations of [accreditation] review." We are pleased to see that NACIQI supports efforts already underway at one regional accrediting agency, the Higher Learning Commission (HLC) of the North Central Association of Colleges and Schools. HLC is currently working to implement a new Pathways model for seeking and maintaining accreditation. The Pathways model allows different levels of reporting requirements for schools at different stages in their operations and continuous improvement efforts. However, it is important to ensure that all institutions are ultimately held to the same set of standards, regardless of size, type, or tax status.
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- Recommendation 21 deals with increased transparency with accreditor decisions and reports. Carrington College advocates for transparency, which is paramount to a true public understanding of the oversight process. We ask the committee to continue this discussion in ensuring that the materials accreditors and institutions would be required to publish demonstrate a thoughtful balance between helpful context and saturating detail.

Again, thank you for this opportunity to provide feedback on NACIQI’s latest draft report of recommendations on the reauthorization of the Higher Education Act.

Sincerely,

Tamara Rozhon, Ed.D.  
President, Carrington College

# CHAMBERLAIN COLLEGE OF NURSING

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
Office of Postsecondary Education  
U.S. Department of Education  
1990 K Street NW, Room 8073  
Washington, DC 20006

To Whom It May Concern,

Thank you for this opportunity to comment on the National Advisory Committee on Institutional Quality and Integrity's (NACIQI's) draft report on the reauthorization of the Higher Education Act. With eleven campuses in Arizona, Florida, Georgia, Illinois, Indiana, Missouri, Ohio, Texas and Virginia and multiple programs offered in the online modality, Chamberlain College of Nursing is in a unique position to provide a valuable perspective on regulatory issues affecting the U.S.

On behalf of my institution, I commend the members of NACIQI for striving to bringing clarity to the very complex issues we are facing in regulating higher education in the twenty-first century. In the narrative below, I address a few of the specific recommendations:

- Recommendations 1-7 address the potential benefits of increased communication among regulators and the importance of clarifying regulatory roles, including state agency responsibility for consumer protection. Chamberlain College of Nursing is supportive of increased communication among regulators, especially communication that would decrease duplication, identify gaps, and ensure appropriate consumer protection for students. The Department of Education is in a position to provide a federal venue for both state and accrediting agencies to convene. The federal government is also in a position to foster inter-state collaboration for minimum, if not uniform, state standards for authorization to operate, and for program approval. It is imperative that federal, state, and accrediting agencies set realistic expectations for feasible regulatory activity within current budget constraints.
- Recommendation 10 touches on the benefits of "varied levels and durations of [accreditation] review." We are pleased to see that NACIQI supports efforts already underway at our institutional accrediting agency, the Higher Learning Commission (HLC) of the North Central Association of Colleges and Schools. HLC is currently working to implement a new Pathways model for seeking and maintaining accreditation. The Pathways model allows different levels of reporting requirements for schools at different stages in their operations and continuous improvement efforts. However, it is important to ensure that all institutions ultimately are held to the same set of standards, regardless of size, type, or tax status.

- Recommendations 12 and 25 target gradations in accreditation decisions about institutions and NACIQI decisions about accreditors. This suggestion gives us pause, as we suspect it will prove complicated and confusing, lacking true public benefit.
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- Recommendation 21 deals with increased transparency of accreditor decisions and reports. Chamberlain College of Nursing advocates for transparency, which is paramount to a true public understanding of the oversight process. We ask the committee to continue this discussion to ensure that the materials accreditors and institutions would be required to publish demonstrate a thoughtful balance between helpful context and saturating detail.

Again, thank you for this opportunity to provide feedback on NACIQI's latest draft report of recommendations on the reauthorization of the Higher Education Act.

Sincerely,

Susan Groenwald, PhD(c), MSN  
 President of Chamberlain College of Nursing

# COUNCIL FOR HIGHER EDUCATION ACCREDITATION

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
c/o Carol Griffiths  
Acting Executive Director  
1990 K Street NW, Room 8073  
Washington, DC 20006

Dear Committee Members:

We thank the National Advisory Committee on Institutional Quality and Integrity (NACIQI) for this opportunity to comment on its draft final report (hereafter “report”) on accreditation considerations for the reauthorization of the Higher Education Act.

We share NACIQI's view that accreditation should continue to be the primary vehicle for assuring and improving quality in higher education. At the same time, we believe that some recommendations in the report may lead to a federal standardization of expectations of academic quality. The report suggests a more active role by the U.S. Department of Education (USDE) in the practices of accreditation. These recommendations would move accreditation away from its focus on institutional academic leadership through peer review that has been integral to its success and effectiveness and would alter the relationship between institutions and accreditors in counterproductive ways. Accordingly, we urge NACIQI to reconsider many of the recommendations contained in the report.

We are concerned that the report calls for greater federal involvement in the regulatory activities by the states as this affects accreditation. It is neither appropriate nor authorized by statute for NACIQI or USDE to direct state governments in their regulatory activities. Accrediting organizations and states have a long and successful history of working together without this involvement.

We are also concerned that the report suggests that the federal government could play an active role in the design of accreditation. Decisions about the structure of accreditation are the primary responsibility of institutions and accreditors, not government. Specifically, the report contains a recommendation that a system of accreditation more closely aligned to mission or sector rather than geography “may be called for.” If a sector of higher education chooses to establish an accreditation organization, it is free to do so without federal involvement, unless the organization seeks federal recognition.

Additionally, we are concerned that the report moves us in the direction of requiring national standards to be used in accreditation reviews. The evaluations of institutions and programs are based on accreditation standards as they apply to specific institutional or programmatic missions. Moving away from evaluation of mission-driven effectiveness to a system of institutional or programmatic compliance with national standards, as the report appears to suggest, means that accreditation's focus on improvement would be lost. Institutions would be sapped of their ability to be creative, flexible, innovative and distinct.

Similarly, it is neither appropriate nor desirable for the federal government to prescribe, as the report suggests, how accrediting decisions are publicized or to direct the extent of the information to be released on these decisions. These determinations appropriately are made by accrediting organizations. Institutions and programs should be held accountable to provide useful and reliable information to the public on issues of importance including learning outcomes, graduation rates and job placement (where appropriate).

The report's recommendations about the future role of NACIQI are also of concern. Although NACIQI advises the Secretary of Education on accreditation-related issues, the committee's primary purpose is to make recommendations regarding the recognition of accrediting organizations. Shifting NACIQI's focus from recognition reviews would be to the detriment of the entire recognition process. Designing accreditation processes and determining how best to oversee academic quality and institutional improvement is the province of the academy, not the federal government.

Taken together, the recommendations put forth in the report suggest fundamental changes to the relationship among the federal government, state governments and accreditation. The federal government would assume a more directive and prescriptive role with states in their regulatory activities and with accreditation in its standard-setting and review of individual institutions. We believe the recommendations would move us in the direction of nationalizing standards for quality and the operation of accreditation as well as the teaching and learning activities of our institutions. This would include, as the report indicates, federal direction with regard to the data that accreditors collect and the information that is made available to the public. NACIQI would become less an advisory committee on recognition decisions by USDE and would assume greater authority in the accreditation process itself. These changes to accreditation and how it operates are neither necessary nor desirable.

Accreditation would not be strengthened by many of the recommendations contained in this report. Rather, its fundamental commitment to institutional academic leadership through peer review, focusing on institutional improvement, would be altered and perhaps severely diminished. For the reasons noted above, we encourage NACIQI to reconsider many of these recommendations.

A far better approach would be to address accreditation as an effective process – not an undertaking in need of repair – that can be strengthened through better communication and coordination among accrediting organizations, states and the federal government. This approach would lead to shared expectations for quality, improvement and accountability while nonetheless maintaining the leadership of the academy. We urge NACIQI to consider the many proposals to further strengthen accreditation that have been put forward by the accreditation community.

Thank you.

Sincerely,

Judith Eaton  
President

On behalf of:

Accreditation Council for Business Schools and Programs  
Accreditation Council for Pharmacy Education

Accrediting Commission of Career Schools and Colleges  
Accrediting Council for Independent Colleges and Schools  
Accrediting Council on Education in Journalism and Mass Communications  
American Board of Funeral Service Education, Committee on Accreditation  
American Dietetic Association, Accreditation Council for Education in Nutrition and Dietetics  
American Podiatric Medical Association, Council on Podiatric Medical Education  
American Psychological Association, Commission on Accreditation  
American Speech-Language-Hearing Association, Council on Academic Accreditation in Audiology and  
Speech-Language Pathology  
Association for Biblical Higher Education, Commission on Accreditation  
Association for Clinical Pastoral Education, Inc., Accreditation Commission  
Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission  
Commission on Accreditation of Allied Health Education Programs  
Commission on Collegiate Nursing Education  
Council for Higher Education Accreditation  
Council on Social Work Education, Office of Social Work Accreditation and Education Excellence  
Distance Education and Training Council, Accrediting Commission  
International Assembly for Collegiate Business Education  
Joint Review Committee on Education in Radiologic Technology  
Joint Review Committee on Educational Programs in Nuclear Medicine  
Middle States Association of Colleges and Schools, Middle States Commission on Higher Education  
Montessori Accreditation Council for Teacher Education  
National Council for Accreditation of Teacher Education  
New England Association of Schools and Colleges, Commission on Institutions of Higher Education  
North Central Association of Colleges and Schools, The Higher Learning Commission  
Southern Association of Colleges and Schools, Commission on Colleges  
Teacher Education Accreditation Council, Accreditation Committee  
Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges  
Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities

# COMMISSION ON MASSAGE THERAPY ACCREDITATION

Sent to: [accreditationcommittees@ed.gov](mailto:accreditationcommittees@ed.gov)

Subject line: "Written Comments regarding the draft final report on the reauthorization of the HEA."

National Advisory Committee on Institutional Quality and Integrity  
c/o Carol Griffiths  
Acting Executive Director  
1990 K Street NW, Room 8073  
Washington, DC 20006

March 15, 2012

Dear Committee Members:

This letter summarizes comments from the Commission on Massage Therapy Accreditation (COMTA) in response to the draft final report of February 8, 2012 from NACIQI on the reauthorization of the Higher Education Act. COMTA is a specialized accrediting agency recognized by the Secretary to accredit single-purpose institutions and programs teaching massage therapy, bodywork and esthetics. About half of our 100 accredited members are single-purpose institutions in the private sector and the other half are programs within both for-profit and private non-profit/ public institutions.

First, we support your recommendation to retain accreditation in the institutional eligibility process for participating in federal funding programs. We agree that accrediting agencies provide a valuable service in a relatively cost-effective manner and are the most appropriate entity to establish quality of education, but we suggest an additional criterion in the form of programmatic accreditation for establishing eligibility.

Our standards include detailed criteria for curriculum which are applied to both institutional and programmatic applicants for accreditation with COMTA. We are in a unique position to see programs within institutions representing a wide spectrum of accreditation, ownership and scale of operations; from independently owned unaccredited single locations to corporately owned multi-location institutions with national accreditation, from community college programs to regionally accredited for-profit corporations.

In our experience reviewing curriculum in these different environments, we have noted that institutional accreditation by another agency brings certain levels of quality assurance for administrative aspects of the schools. However, the quality of the curriculum and how the program prepares graduates to enter the work force vary greatly, signifying that institutional accreditation is not necessarily a reliable indicator of quality programs, at least in the field of massage therapy. Therefore, we suggest that the NACIQI consider programmatic accreditation in partnership with institutional accreditation as a more effective measurement of educational quality than institutional accreditation alone.

Regarding the numbered recommendations within the draft report, we are generally agreeable and offer a few specific comments for your consideration:

# 4 & 5 – We encourage a process to establish critical elements, clearly designate which member of the triad is best suited for each and reduce overlap of oversight to a minimum.

# 7 – In regulation of our profession, schools are sometimes subject to submitting reports to their state agencies which are very comparable to an accreditation self-study. In some cases, a school outside the state must still supply a report in order for graduates to practice professionally in that state. We realize this issue is also related to regulation of a specific profession and we are working to address that within our professional organizations and state regulators. We support efforts at the federal and state levels to reduce the number of different agencies every school must be approved by for graduates to have their education considered “valid” should they decide to move after graduation, while still preserving the important role of consumer protection that states are performing. We also invite input from states regarding how we as an accrediting agency could support them in reducing the duplicate processes. If this input were provided through a federally-convened process, we would participate.

# 8 – We support exploring options to reduce legal risk and burden on individual agencies, especially for issues directly related to gatekeeping functions.

#9 – We support creative dialogue within the accrediting community, although we are concerned about how freedom of choice of agency may lead away from consistent quality of education.

In our field, unaccredited single-purpose schools do have a choice when it comes to which institutional accrediting agency they choose; up to seven different options exist for massage schools seeking institutional accreditation. Certain types of schools seek out the most stringent requirements and aim to meet those standards, while others look for the lowest requirement or lowest cost and make their decision based on ease of becoming accredited. Ultimately they may all become accredited and qualify to participate in federal funding programs, with vastly different levels of quality in the program. At some point there needs to be an area of consistency of policy to ensure quality of education across sectors and across the country. We suggest again that programmatic accreditation be considered as a possible solution to this issue.

#10-12 – Greater opportunity to create variations of reviews and decisions which are relevant to the applicant would be an excellent change, both for reviewing agencies for recognition and for the review of schools by the agencies.

#13 – We support modifying the criteria and emphasizing the most important areas for verification. We request the opportunity to participate in the process of defining what information is crucial for determining quality of education.

#14 – We support reconsidering data collected and how the data could be more effectively collected/processed/accessed for use by multiple entities and consumers.

#15 – Sharing of data and analysis conducted by the federal government would be much appreciated. Often the result of the analysis is not shared until an official letter is delivered to the school, which may take quite a long time and may be too late in the process for the accrediting agency to use the information.

#17 – Common definitions could be beneficial, but coming to agreement about the definitions may take some time. Generally we support expanding the completion/graduation data to include students who graduate in any timeframe, not limited to 150% of normal completion time. If our goal is completion, let’s include all who

complete successfully. Completing an intensive program in a short time period is not always beneficial in terms of assimilating the material. If the data collection method allows it, completion rates could be calculated for a variety of time-frames to allow deeper analysis and benchmarks which vary by accreditor.

#18 – If independent audits are required, we recommend limiting the data verified to things that can be quantified clearly such as completion and licensure. In our field, placement is very difficult to define and could pose serious problems in an audit without the ability to weigh information against norms in the specific profession.

#21– We support efforts to afford students and the general public the opportunity to make accurate comparison based on facts. The publishing of certain reports would be acceptable provided the school has been given the opportunity to respond prior to publication. The ability to create a greater variety of Commission decisions and accreditation statuses would also be an important piece with regard to publishing certain reports. It needs to be easy for the public to understand when a status is a matter of general compliance but needing more documentation versus an issue of the school being in danger of losing accreditation.

#22 – “Knowledgeable” is a key word in this item. Public Members who are knowledgeable and willing to put in the work for accreditation decision making boards are sometimes hard to come by. Increasing the number of Public Members may lead to greater expense for the agency without a comparable increase in the work done by the board. We have found that administrators and academics are generally more dedicated to the work of the agency because they have direct experience with how accreditation works on their campuses. We are lucky to have the opportunity to include other academics on our board in the Public Member role because their institutions have no connection to our scope of accreditation. As long as “Public Member” is interpreted in such a way that other agencies can also utilize the expertise of academics and administrators outside their scope in this role, we are not opposed to increasing the number of Public Members.

Thank you for the opportunity to comment on the draft report. We believe the accreditation process is working, but improvements can be made. Our Commission is dedicated to participating in the collective improvement process and we look forward to more opportunities to do so.

Sincerely,

Melissa Wade  
Chair  
Commission on Massage Therapy Accreditation  
5335 Wisconsin Avenue, NW, Suite 440  
Washington, DC 20015  
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# CORINTHIAN COLLEGES, INC.

## Comments on NACIQI Draft Final Report

### Higher Education Accreditation Reauthorization Policy Recommendations

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Corinthian Colleges, Inc., hereby submits its comments in response to the notice published in the Federal Register on February 17, 2012 (77 Fed. Reg. 9651). Corinthian is one of the largest postsecondary education companies in North America. Our mission is to change students' lives. We offer diploma and degree programs that prepare students for careers in demand or for advancement in their chosen fields. Our program areas include health care, business, criminal justice, transportation technology and maintenance, construction trades and information technology. We have 123 Everest, Heald and WyoTech campuses, and also offer degrees online.

Our campuses have been accredited by both national and regional recognized accrediting agencies – the Accrediting Commission of Career Schools and Colleges (ACCSC), the Accrediting Council for Independent Colleges and Schools (ACICS), the Higher Learning Commission of the North Central Association of Colleges and Schools (HLC), and the Accrediting Commission for Community and Junior Colleges – Western Association of Schools and Colleges (ACCJC-WASC). Programs at our campuses hold specialized accreditation from eight recognized agencies. Representatives of our campuses serve on the boards of ACCSC and ACICS. One of our senior executives, while in private legal practice, served as counsel to numerous national, regional and programmatic accrediting agencies, as well as the Council for Higher Education Accreditation (CHEA), and as a negotiator in accreditation negotiated rulemakings conducted by the Department of Education. In addition, Corinthian representatives serve as visiting team leaders and members and educational specialists as part of the peer review function of accreditation.

The NACIQI Draft Final Report makes a number of broad observations about the role of accreditation in the Higher Education Act (HEA) gatekeeping system and equally broad recommendations to the Secretary. The subject matter of these observations and recommendations is well-plowed ground. Indeed, many of the points made in the Draft Final Report offer nothing really new that was not proposed, debated, and decided in previous Reauthorizations of the HEA, especially the 1992 Reauthorization. Thus, the Higher Education Amendments of 1992, as amplified by the Higher Education Amendments of 1998 and the Higher Education Opportunity Act of 2008, addressed the “responsibilities of each member of the triad” and provided for “[i]ncreased communication among members of the triad.” (Draft Final Report, Recommendations 1 and 2). The states have long been

engaged with “consumer protection and investigation” and will continue to be so with or without federal encouragement. (Draft Final Report, Recommendation 3).

Moreover, the Draft Final Report casts too widely in referring to the multiple purposes of accreditation and postsecondary education. If accreditation is to remain a gatekeeper to institutional eligibility as the Draft Final Report recommends – and we agree with this recommendation – it is unduly complicating and even dangerous for NACIQI to treat as relevant to its task a “well-educated citizenry,” “individual and community well-being,” “civic participation,” and “continuous improvement.” (Draft Final Report, page 1). To do so invites a much larger role for the Department in American higher education than the HEA establishes or than is prudent if, as the Draft Final Report also states, “a strength of American higher education has been its freedom from federal determination of institutional quality and self-improvement processes.” (Draft Final Report, page 2). In formulating its recommendations, NACIQI should focus solely on the considerations relevant to accreditation’s gatekeeping role in furthering the purposes of the HEA – expanding access to, and accountability for the public’s funds invested in, postsecondary education.

In addition to these concerns about the overbroad tendencies of the Draft Final Report, there are several specific points raised in it that we urge NACIQI to reconsider before forwarding its recommendations to the Secretary:

- The Draft Final report asserts that the federal role in accreditation includes the assurance that taxpayer funds are used only for “acceptable educational activities.” (Draft Final Report, page 4). Although this phrase has some ambiguity, we are concerned that NACIQI means only those institutional structures and modalities that are well-established in higher education. This would close the door to potentially productive disruptive innovation that will expand access and better meet students’ needs. (See A. Kamenetz, DIYU (2010); C. Christensen and H. Irving, The Innovative University (2011); D. J. Brewer and W.G. Tierney, Reinventing Higher Education (2011)). One of the opportunities presented by the next Reauthorization would be to re-think the structures and modalities that can qualify for the HEA funding programs. In this regard, we refer NACIQI to the recent testimony of Kevin Carey of Education Sector before the Senate Health, Education, Labor and Pensions Committee on February 2, 2012. We believe that the importance of facilitating innovation in higher education cannot be over-emphasized. It is imperative to align federal and state law and regulation and accreditation with a global education marketplace demanding much more from higher education.
- Concerning the state role in quality assurance, the Draft Final Report calls for determining the “mechanisms that will best insure critical quality assurance/eligibility expectations are met across institutions and agencies nationwide.” It also calls for the

federal government to “promote greater engagement and consistency across states.” (Draft Final Report, Recommendations 4 and 5). The Department’s efforts to establish minimum requirements for state authorization have recently provoked challenges and reversals in the courts and the Congress. The Draft Final Report appears to contemplate steps that go beyond even these problematic measures. Federalism requirements and considerations counsel that NACIQI should not make recommendations that would infringe upon the states’ prerogatives.

- Turning finally to the role of accreditors, the Draft Final Report states that in discharging their gatekeeping functions, the “potential for risk and legal action associated with application of rigorous standards may be greater than a single accreditor is prepared to sustain,” and calls for exploration of “assigning the more risky, litigation-prone elements of the gatekeeping function to a different quarter.” (Draft Final Report, Page 5, Recommendation 8). This ignores the highly relevant history of the national accreditors who undertook these very risks in the 1990’s and successfully withdrew accreditation from numerous institutions that had failed to meet accreditation standards and defended their decisions in litigation. It can be done and has been done by agencies that take their gatekeeping role seriously. If other agencies are so reluctant to run these risks, that calls into question whether accreditation should continue to fulfill a gatekeeping function.
- The Draft Final Report notes that under the current system the same level of scrutiny is given to accreditors and institutions with “longstanding competent performance ... as is given to those that might be fragile, unstable, low-performing, rapidly expanding or changing, or newly-approved.” Accordingly, the Draft Final Report recommends allowing federal and accreditor participants the opportunity to distinguish between applicants and to devote greater review effort to accreditors and institutions that “present greater potential cause for concern.” (Draft Final Report, pages 5-6, Recommendation 10). This notion resurrects a proposal that has arisen previously before NACIQI – that certain accrediting agencies and institutions are so obviously worthy that they deserve a pass from the bothersome recognition and accreditation reviews. This has always foundered on the problem that it prejudices outcomes and flouts fundamental due process and equal treatment requirements. It is the accreditation equivalent of “verdict first, trial second,” and would fail to withstand any serious legal scrutiny. It is also logically and empirically flawed: even the most glittering status is no guarantee of current or future performance.

There are some valuable suggestions and recommendations in the Draft Final Report. One is to reassess the foundations of regional accrediting organizations. As the Draft Final Report states, postsecondary educational activities now span regional and even national boundaries. (Draft Final

Report, Page 5). A regional framework is increasingly anachronistic and burdens institutions with costs that add no real value. Corinthian, for example, operates campuses in 26 states and the province of Ontario in Canada. We deal with four institutional accreditors, including two regional agencies. We have explored accreditation from other regional agencies. A single rigorous and efficient quality review system that is perceived as such by students, employers, and the public would be far preferable to the patchwork system now in place. That system confuses rather than guides and illuminates.

We also commend the recommendations on data. (Draft Final Report, Recommendations 14-20). In particular, we support a set of common and consistent definitions and accompanying metrics. Multiple definitions of completion, placement, and other outcomes serve no one's interests, and again add unproductive costs. The devil, as always, is in the details when these definitions are formulated, and definitions are often used to exclude or disadvantage. But conceptually, a common vocabulary would be helpful.

Finally, we support additional transparency. (Draft Final Report, Recommendations 21, 22). As a public company, we already are required by a different set of standards, *i.e.*, those of the securities laws, to disclose considerable information that many other institutions shrink from revealing. We believe that longstanding concerns in accreditation about disclosure to students and the public are overblown. We also believe that increasing public representation on accreditation decision making boards will boost confidence in accrediting agencies from policy makers and the public.

# COUNCIL OF REGIONAL ACCREDITING COMMISSIONS

March 16, 2012

TO: [accreditationcommittees@ed.gov](mailto:accreditationcommittees@ed.gov)

SUBJECT: **Written Comments Regarding the Draft Final Report on the Reauthorization of the Higher Education Act**

On behalf of the Council of Regional Accrediting Commissions (C-RAC), I am pleased to have this opportunity to respond to the draft final report on the reauthorization of the Higher Education Act (HEA) prepared by the National Advisory Committee on Institutional Quality and Integrity (NACIQI).

On November 23, 2011, C-RAC responded to NACIQI's prior draft report. In addition, we closely monitored NACIQI's December meeting at which options put forth in the discussion draft were debated. We are pleased that NACIQI responded to several of the issues raised by C-RAC, and in particular that the Committee is not recommending the removal of accreditation from the determination of institutional eligibility for federal student aid programs.

We continue to support several of the ideas from the prior draft that are maintained in this final draft, such as those dealing with improved communication among the "triad" and the need to improve data collection and utilization as it relates to quality assurance. However, we remain concerned with many aspects of the report. One overarching concern is that the 25 individual proposals, taken together, would represent a significant expansion of current law regarding program integrity. This expansion would in turn result in more federal regulations and an even greater number of new federal mandates for states and accreditors as well as institutions. We encourage members of the Committee to keep this point in mind as the report is finalized.

Below, please find C-RAC's views on each of the six main policy areas addressed by NACIQI.

**1. The "triad" of actors in educational quality assurance:**

C-RAC supports improved articulation of responsibility among the triad as well as increased communication to help better understand and address issues of common concern. However, the proposal encouraging state engagement with consumer protection "whether within or outside the process of accreditation" is not clear. In general, we support the move to have states responsible for consumer protection as they have the tools to resolve consumer complaints. Nonetheless, accreditors have the responsibility to address complaints related to institutional compliance or failure to meet accreditation standards; we do not believe that the states should become engaged in the accreditors' handling of such complaints.

**2. The federal and state roles in quality assurance:**

C-RAC supports the notion of expanding conversations among the triad on issues

of quality assurance and eligibility expectations. However, many of the specific recommendations under this section raise concern because they could be construed as proposing national standards and protocols among institutions and accreditors as well as state agencies. As regional accreditors, we work together formally, and oftentimes informally, to build upon best practices. Such efforts to develop higher education best practices should continue to grow from institutions and accreditors, and not by imposition from the federal government.

### **3. The role and scope of accreditors:**

This section encompasses a variety of issues including ideas aimed at reducing the exposure of accreditors to lawsuits brought about through the accreditation process. We appreciate the Committee's recognizing one of the challenges accreditors face as they make difficult decisions. However, we believe it is important to note that such challenges have not prevented regional accreditors from taking tough action when necessary. At the same time, although we do not support the solutions offered in the proposal, we acknowledge that this problem is worth ongoing discussions.

With respect to moving "litigation-prone elements" out of the gate-keeping function, we do not believe that it is possible or practicable to identify such elements. In reality, institutions facing adverse actions that want to sue will find a way to do so. Even if such elements could be identified, we do not believe it would be beneficial to move any group of institutions away from accreditation. We would also be concerned with another entity providing resources or indemnification to accreditors. It is not clear what other entity this would be, if not the federal government; if it were the federal government, the outcome would greatly upset the current balance within the triad.

This section also proposes a system of accreditation based not on region but on sector or mission and entertains the idea of allowing institutions to choose among accreditors. We do not support these concepts. We believe a key strength of accreditation is the peer review process across diverse institutions, which enables institutions in one sector to benefit from the quality and expertise of other sectors. We also believe a single accreditation tent for institutions with a wide range of missions promotes mobility for students transferring or moving to a higher degree. Further, our regional system tends to increase involvement of institutions in accreditation – a vital element in a robust system of self-regulation. And while the idea of grouping institutions by mission may sound attractive, the work of the Carnegie Foundation for the Advancement of Teaching that moved to a multi-dimensional classification system in 2005 demonstrates that what once seemed simple is now quite complex: sector lines have blurred.

Similarly, we are opposed to the idea of choosing accreditors – particularly among regions. Such a system could drive an apparent "race to the bottom" as institutions believed that one region or another was less rigorous. In addition, it would create instability within the system as the regions would be faced with a continual flux of institutions and state relations. Furthermore, the system would likely increase the burden of states in having to interact with multiple and possibly shifting accreditors. For states and accreditors the system would become significantly more expensive and less efficient, and ultimately these costs would reach institutions.

Also under this section is the proposal to enable greater flexibility in how accreditors and institutions are reviewed, taking into account varying levels of concern. While we note that NACIQI often has few means of making such distinctions in its review of accreditors (the expansion of which could be beneficial), accreditors often distinguish among applicants and institutions in different ways; such as with varying lengths of accreditation or different levels of required follow-up.

However, accreditors would welcome increased flexibility from current regulations that essentially require every element of a comprehensive review to be the same for every institution. While some accreditors are experimenting with ways to address this issue, there is no assurance these plans will pass muster with the Department of Education.

In addition, this section promotes affording accreditors “greater opportunity to offer more gradations in their accreditation decisions.” We note that nothing currently prevents accreditors from offering more gradations, but we would be opposed to such gradations being dictated or defined at the federal level.

#### **4. Data as an essential tool in quality assurance:**

While we support many of the general concepts put forth under this section, we do so with many caveats.

We agree that a reconsideration of data collection based upon cost and utility is warranted, although we recognize this is an enormous undertaking. While we also believe better sharing of data may have potential, should the federal government need to collect institutional data it should do so directly so as not to use accreditors as agents of the federal government. The questions of how institutions and accreditors use institutional data on student outcomes should be left to the higher education community.

This section also calls for improved consistency in definitions – about both what data are needed and the meaning of individual data elements, such as completion/ graduation rates. Such efforts may be beneficial and in some cases are already underway through initiatives such as the Measures of Student Success Task Force. However, this pursuit of consistency should not become a means to dictate federal metrics and thresholds that accreditors would be required to use or enforce.

#### **5. Data in service of public and consumer information:**

The proposal to make accreditation reports about institutions available to the public is rightly qualified by recognizing that “further discussion is needed about what reports to include, and about how to increase information and transparency while sustaining other critical values in the accreditation process.” In fact, regional accreditors are collectively experimenting with various ways to make more information available to the public with respect to accreditation. We believe that such efforts should not be dictated at the federal level, but that accreditors should continue to have the flexibility to develop and implement such procedures.

While C-RAC is a supporter of having public members on accreditation decision making boards, we oppose any expansion of the current federal mandate which requires there to be one public representative for every seven members. While several regional accreditors have a greater proportion of public members on their boards, we all face significant challenges in finding knowledgeable public members who are willing and able to serve in this voluntary capacity. This challenge is exacerbated by the very narrow federal standards on what constitutes a “public” member.

## **6. The role of NACIQI as a federal advisory board:**

We are opposed to NACIQI asking us to report on the universe of institutions we accredit. We believe this would greatly expand the role of NACIQI beyond providing advice and invite second-guessing of accreditation decisions made with respect to individual institutions. The proposed intent of NACIQI “developing standards” and “assessing system wide outcomes and consistency” is not entirely clear. However, to the extent it would be a means by which the authority of NACIQI would be expanded into areas not currently authorized under HEA, we are opposed.

We appreciate this additional opportunity to comment on the work of NACIQI and offer our continued assistance as you develop final recommendations for the reauthorization of the Higher Education Act. Sincerely,

Belle Wheelan  
Chair, Council of Regional Accrediting Commissions

BSW:rb

cc: Regional Executives

Middle States Commission on Higher Education  
MSCHE

The Commission on Institutions of Higher Education, New England Association of Schools and Colleges  
NEASC

Higher Learning Commission of the North Central Association of Colleges and Schools  
HLCNCA

Northwest Commission on Colleges and Universities  
NWCCU

Southern Association of Colleges and Schools Commission on Colleges  
SACSCOC

Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges  
ACCJC/WASC

Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges  
ACSCU/WASC

## CURRY COLLEGE

**FW:** Written Comments regarding the draft final report on the reauthorization of the HEA Accreditation Committees

**Sent:** Friday, March 16, 2012 1:40 PM

**To:** Griffiths, Carol

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**From:** Quigley, Ken [mailto:kquigley@post03.curry.edu]

**Sent:** Friday, March 16, 2012 10:41 AM

**To:** Accreditation Committees

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

Thank you for the opportunity to submit to the National Advisory Committee on Institutional Quality and Integrity comments regarding the proposed Higher Education Accreditation Reauthorization.

Curry College, located in a suburb of Boston, MA is an academic community of approximately 5,000 current students, faculty and staff. We are 2,000 traditional students, 1,600 Continuing Ed students, 600 Graduate students and 800 faculty and staff. While the majority of our students are from New England, we draw students from 28 states and multiple nations.

I have followed the work of NACIQI regarding its Reauthorization Policy Recommendations, and appreciate the investment of time and talent made by the Committee members and those working with them.

I would like to comment specifically on the recommendations that “The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector or other educationally relevant variable, than with geography”. I also wish to comment on the implication of allowing institutions flexibility in choosing accreditors.

I believe that higher education accreditation – and the resulting quality assurance and institutional improvement – is best served by the existing system of regional accreditation.

The current system is more efficient, and, consequently, more effective for colleges and universities in the use of human resources. This promotes communication and best practices. It also facilitates participation of organizations and its faculty, staff and students. Again, promoting best practices. Further, benefits of the current system of regional accreditation include that it facilitates the transfer of credit, an important consideration in today’s world.

I believe that a shift from regional accreditation is likely to result in enhanced costs, bureaucracies and, potentially conflicting standards or directives. An additional concern is the potential unintended consequences of “forum shopping” for accreditation.

Thank you for your consideration of the above, and please do not hesitate to contact me if you should have any questions.

Very truly yours,

Kenneth K. Quigley, Jr.

# DEVRY UNIVERSITY

March 16, 2012

National Advisory Committee on Institutional Quality and Integrity  
Office of Postsecondary Education  
U.S. Department of Education  
1990 K Street NW, Room 8073  
Washington, DC 20006

To Whom It May Concern,

Thank you for this opportunity to comment on the National Advisory Committee on Institutional Quality and Integrity's (NACIQI's) draft report on the reauthorization of the Higher Education Act. With 99 campuses in 26 states and Canada, DeVry University is in a unique position to provide a coast-to-coast perspective on regulatory issues affecting the U.S.

On behalf of my institution, I commend the members of NACIQI for striving to bring clarity to the very complex issues we are facing in regulating higher education in the twenty-first century. It is particularly reassuring to read NACIQI's recognition of the critical gatekeeping role accreditors play in assessing academic quality. I would like to address a few of the specific recommendations in the narrative below.

- Recommendations 1-7 address the potential benefits of increased communication among regulators and the importance of clarifying regulatory roles, including state agency responsibility for consumer protection. DeVry University is supportive of increased communication among regulators, especially communication which would decrease duplication, identify gaps, and ensure appropriate consumer protection for students. The Department of Education is in a position to provide a federal venue for both state and accrediting agencies to convene. The federal government is also in a position to foster inter-state collaboration for minimum, if not uniform, state standards for authorization to operate, and for program approval. It is imperative that federal, state, and accrediting agencies set realistic expectations for feasible regulatory activity within current budget constraints.
- Recommendation 10 touches on the benefits of "varied levels and durations of [accreditation] review." We are pleased to see that NACIQI supports efforts already underway at our institutional accrediting agency, the Higher Learning Commission (HLC) of the North Central Association of Colleges and Schools. HLC is currently working to implement a new Pathways model for seeking and maintaining accreditation. The Pathways model allows different levels of reporting requirements for schools at different stages in their operations and continuous improvement efforts. However, it is important to ensure that all institutions are ultimately held to the same set of standards, regardless of size, type, or tax status.
- Recommendations 12 and 25 target gradations in accreditation decisions about institutions and NACIQI decisions about accreditors. This suggestion gives us pause, as we suspect it will prove complicated and confusing, lacking true public benefit, in addition to watering down the reputations of institutions that

would receive the highest rank. Further, accredited institutions would be affected in a complicated and publicly confusing manner, both by the grade granted by the accreditor, and by the accreditor's grade granted by NACIQI.

- Recommendation 14 suggests reviewing data collection while considering costs relative to utility and appropriate use. We believe all higher education institutions would be in favor of such a review. Our current reporting requirements have become extensive, burdensome, inconsistent, and often redundant. We hope the Committee will further pursue this recommendation.
- Recommendation 16 relates to the development of consistent definitions and metrics, consideration of the distance education modality in data requirements, and the requirement of additional data with great consideration for the related burdens and time constraints. There is considerable momentum for new consistency in definitions and metrics. We encourage the Committee to champion widespread acceptance of the Common Education Data Standards supported by the National Center for Education Statistics, which DeVry University is currently reviewing for potential incorporation. We fully support pursuing additional commonality across higher education in the U.S. as these efforts continue. Distance education modalities are already being incorporated into current data requirements, including recent additions to the Department of Education's Integrated Postsecondary Education Data System (IPEDS). While accrediting agencies have valid reasons for requesting data beyond that required by state and federal agencies, there is general consensus in the higher education community that thoughtful consideration must be given to the need for and the burden of such additional data collection.
- Recommendation 19 raises the controversial topic of national student unit record systems, which would help us overcome many student data obstacles. The Committee is right to focus first on how to overcome the privacy issue. This would allow states and institutions to proceed with a more effective and efficient tracking system for student success, including easier access to federal data across the triad.
- Recommendation 21 deals with increased transparency with accreditor decisions and reports. DeVry University advocates for transparency, which is paramount to a true public understanding of the oversight process. We ask the committee to continue this discussion in ensuring that the materials accreditors and institutions would be required to publish demonstrate a thoughtful balance between helpful context and saturating detail.

Again, thank you for this opportunity to provide feedback on NACIQI's latest draft report of recommendations on the reauthorization of the Higher Education Act.

Sincerely,

David Pauldine  
President, DeVry University

# **NATIONAL ASSOCIATION OF INDEPENDENT COLLEGES AND UNIVERSITIES**

## **Comments on the Draft Final Report of the National Committee on Institutional Quality and Integrity Dr. David L. Warren, on behalf of the National Association of Independent Colleges and Universities**

On behalf of the National Association of Independent Colleges and Universities (NAICU), I appreciate having the opportunity to comment on the February 8, 2012, draft final report on higher education accreditation reauthorization policy recommendations.

We appreciate the work the committee has put into this effort. We were pleased to have had an opportunity to present our views to the committee earlier in the process--at the committee's February 3, 2011, session.

### **Linkage of accreditation and eligibility for federal funds (p. 2)**

We agree completely with the statement in the report “. . . that a strength of American higher education has been its freedom from federal determination of institutional quality and self-improvement processes.” Our system of accreditation has made that possible; and any effort at improvement must preserve this principle.

### **Triad (pp. 3-4)**

As a brief recap, our February 2011 discussion of issues related to the triad made these points:

- (1) The use of private accreditation in quality reviews is a uniquely American institution which has played an enormous role in the strength and diversity that we value in our system of higher education.
- (2) A major role of the federal government is to protect student aid programs from fraud and abuse, and it should remain so. Providing additional resources to permit the Department to carry out this function is preferable to placing more expectations on accreditors to do so.
- (3) Private, non-profit institutions are not under the direct control of State governments, and we have grave concerns about any federal effort to prescribe the nature of these relationships.

The better communication and clarification of the responsibilities of the members of the triad that the committee seeks is a worthwhile undertaking. As a cautionary note, however, we would urge that this proposal not be interpreted as meaning that the federal government should design the rules and roles to be carried out by other participants in the triad. The use of the federal government's “convening capacity” mentioned in recommendation #5 should not be mistaken for the federal government's regulatory function.

Past experience shows that a prescriptive approach is not effective in reaching its intended goals. A notable example is the development and subsequent repeal of State Postsecondary Review Entities (“SPREs”) in the 1990’s. Likewise, in 2008, Congress prohibited the federal government from regulating accreditation standards relating to success with respect to student achievement in reaction to Department of Education efforts to become entrenched in these decisions. More recently, the Department issued highly controversial regulations that specify how states must authorize institutions and provide a federal definition of a credit hour. The House of Representatives recently acted to repeal these regulations.

The type of voluntary, collaborative activities that seem to be anticipated in recommendations #6 and #7 would go much further towards meeting collective goals than do the current regulatory efforts. The intended goals of these regulations are not being met—nor are they likely to be met in the future—because they fail to address the diversity among institutions of higher education and among states.

### **Role and scope of accreditors (pp. 5-6)**

We commend the committee for calling for a closer review of the various legal considerations that accreditors may face in light of their role as federal “gate-keepers.” These concerns have not received widespread attention to date. It would be beneficial to engage in a broad public discussion of the issues and possible approaches for dealing with them.

With regard to recommendations #10-12 regarding flexibility and nuance in the review process, it would be helpful if the committee were clearer about the level of federal involvement anticipated here. To the extent that federal requirements play a role in limiting reasonable flexibility on the part of accreditors, this is a worthwhile area for the NACIQI to examine. This is the task that is described in recommendation #13—but the federal role in the activities described in #10-12 is not well articulated.

### **Data (pp. 6-7)**

Our February 2011 discussion did not address data issues; however, this is an area that NAICU has followed closely. We feel strongly that student privacy must be protected. In addition, the substantial burdens that data collection requirements place on institutions—particularly small ones—are too often ignored.

We are pleased that the committee has recognized that large amounts of data are currently being collected without any real consideration of whether the costs can be justified by the benefits of its use. We believe that consideration should also be given to defining the purposes for which data is being collected and the length of time such data resides in databases. The Center on Law and Information Policy at Fordham University published a study in 2009 detailing serious privacy issues associated with the collection of data about elementary and secondary school students. This is not a situation we would want to see replicated with higher education records.

The committee's interest in exploring how data collected in the Integrated Postsecondary Education Data System (IPEDS) could be made more useful is also welcome. This is a rich source of data, and substantial institutional effort goes into its collection and reporting. Much more could be done to make this information more accessible to consumers.

In any data discussion, it is also important to bear in mind that no single set of numbers is going to offer an across-the-board measure of institutional success for the diversity of institutions across the country.

### **Transparency (p. 8)**

Our February 2011 discussion of disclosure made these points:

- (1) NAICU believes that general disclosures of accreditation findings will substantially change the nature of the accreditation process and undermine the frankness and candor that help make the process successful.
- (2) The ultimate test of any new disclosure requirements should be their usefulness to students and parents.
- (3) It would be more productive to increase public understanding of the accreditation process itself.

The concerns we articulated last year remain concerns today. We appreciate the committee's acknowledgement in recommendation #21 that other critical values do come into play when considering specific means of increasing transparency.

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### *About NAICU*

The National Association of Independent Colleges and Universities (NAICU) serves as the unified national voice of independent higher education. Since 1976, the association has represented private colleges and universities on policy issues with the federal government, such as those affecting student aid, taxation, and government regulation.

With nearly 1,000 members nationwide, NAICU reflects the diversity of private, nonprofit higher education in the United States. Members include traditional liberal arts colleges, major research universities, church- and faith-related institutions, historically black colleges and universities, women's colleges, performing and visual arts institutions, two-year colleges, and schools of law, medicine, engineering, business, and other professions. NAICU is committed to celebrating and protecting this diversity of the nation's private colleges and universities.

## NEIL AND ROTHKOPF

**Alternative to the NACIQI Draft Final Report  
Submitted by Anne Neal and Arthur Rothkopf  
March 16, 2012**

### **Recommendation: Break the link between federal student aid and accreditation.**

The federal government currently spends over \$175 billion in student financial aid, and cumulative student loan debt already exceeds one trillion dollars. Clearly, the federal government has a rightful interest in the accountability of American higher education.<sup>1</sup> However, the current system designed to ensure academic accountability – accreditation – is dysfunctional and neither protects the federal dollar nor ensures academic quality.

Far from being the generally “admirable” system of quality assurance outlined in the draft final report, accreditation is a broken system. With accreditors as gatekeepers, nearly 7000 colleges and universities across the country are accredited and have access to federal funds.<sup>2</sup> Once accredited, institutions rarely lose their accreditation. And yet the Department’s own National Assessment of Adult Literacy finds that a majority of four-year college graduates could not reliably compare two editorials or compute the cost per ounce of food items.<sup>3</sup> Professor Richard Arum of New York University – who appeared before NACIQI – and Professor Josipa Roksa of the University of Virginia reported that more than half of the students they surveyed at a wide range of accredited colleges and universities learned little or nothing in their first two years.<sup>4</sup> Employers consistently report concerns that the quality of higher education is inadequate for workplace needs.<sup>5</sup> This is not quality assurance and we shouldn’t pretend otherwise.

A substantial part of the problem lies in the dual – and conflicting—nature of accreditation. The accreditors want to be gatekeepers for federal funding on the one hand and self-improvement experts on the other. The two roles simply do not mesh. The combination of these two functions, says the draft final report, is the best system available because it is nongovernmental and imports the voluntary system of quality assurance and self-improvement that existed before the adoption of the Higher Education Act.

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<sup>1</sup> To our knowledge, the accreditation system is highly unusual in outsourcing to private entities decision-making over such significant sums of taxpayer money, especially given the conflicts of interest and inconsistencies in the application of accrediting standards.

<sup>2</sup> CHEA Fact Sheet #1, Profile of Accreditation, revised, August 2011: “6632 accredited institutions were certified to participate in the federal Title IV (Student Assistance) Program in 2008-2009.”

<sup>3</sup> Mark Kutner, Elizabeth Greenberg, and Justin Baer, *A First Look at the Literacy of America’s Adults in the 21<sup>st</sup> Century* (Jessup, MD: National Center for Education Statistics, 2005) <http://nces.ed.gov/NAAL/PDF/2006470.PDF>.

<sup>4</sup> Richard Arum and Josipa Roksa, *Academically Adrift* (Chicago: University of Chicago Press, 2011).

<sup>5</sup> Linda Barrington, Jill Casner-Lotto, *Are They Really Ready to Work? Employers’ Perspectives on the Basic Knowledge and Applied Skills of New Entrants to the 21<sup>st</sup> Century U.S. Workforce* (The Conference Board, Corporate Voices for Working Families, The Partnership for 21<sup>st</sup> Century Skills, and the Society for Human Resource Management [New York, NY and Washington, DC: 2006]) [http://www.p21.org/storage/documents/FINAL\\_REPORT\\_PDF09-29-06.pdf](http://www.p21.org/storage/documents/FINAL_REPORT_PDF09-29-06.pdf); *Raising the Bar. Employers’ Views on College Learning in the Wake of the Economic Downturn* (Hart Research Associates, Washington, DC: 2010) [http://www.aacu.org/leap/documents/2009\\_EmployerSurvey.pdf](http://www.aacu.org/leap/documents/2009_EmployerSurvey.pdf).

But accreditors are not, in fact, voluntary private actors. As gatekeepers of federal financial aid, accreditors function as agents of the federal government. They have the ability to permit or withhold federal funds – a matter of life and death for institutions. It is because of this very powerful role that a number of institutional witnesses raised serious concerns about growing regulatory prescriptions and intrusiveness, and about inconsistencies in findings in the accreditation process. Notably, a significant number of the recommendations in the draft final report risk creating an even more intrusive accreditation system– that will raise costs and impinge on institutional autonomy.

The draft final report would have it both ways. It wants accreditors to continue to act as private peer review teams, but then seeks special federal intervention – such as insurance coverage for the “more risky litigation-prone elements” of gatekeeping. If accreditors genuinely want to be private peer review teams, they can be – by returning to the voluntary system of quality assurance and self-improvement that existed before they were made gatekeepers of federal funds.<sup>6</sup> Delinking accreditors from their federal gatekeeper role is essential to achieving this end.<sup>7</sup> Neither the federal government nor accrediting agencies acting as its surrogate can address the complex issues that comprise academic quality.

It is time to return to the original vision of accreditation: peer institutions advising and critiquing one another in a voluntary, yet rigorous system of self-improvement.

This would also eliminate the serious conflicts of interest that exist under the accreditation system. Funding of the accrediting agencies comes from the same institutions they are supposed to regulate. The very people who benefit from federal funds, moreover – administrators and faculty who constitute accrediting teams – are the self-same people that determine whether federal funds should flow. They know they will in turn be judged by similar accrediting teams, making them loath to apply rigorous quality measures. It is as if the Federal Government allowed banks to decide which banks are safe and then empowered them to determine those eligible for access to Federal Reserve loans and other benefits.

Accreditation currently gives students and parents a false sense that accredited schools have passed a meaningful test of quality when they have not. Real public accountability cannot and should not be imposed by accreditors but should come from the institutions themselves. And this accountability can be provided far more cheaply and more effectively by simply demanding evidence of financial stability and transparent consumer information.

**Recommendation: Initiate a new simplified and cost-effective system of quality assurance that tells the public what it needs to know and protects taxpayer dollars.**

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<sup>6</sup> The Veterans’ Readjustment Assistance Act of 1952 stipulated that students could only use funding provided by the Act to attend accredited institutions. The gatekeeping role of accreditation was augmented further with the 1965 Higher Education Act which created new comprehensive federal student aid programs which only accredited schools were eligible to administer. See further: Peter T. Ewell, *U.S. Accreditation and the Future of Quality Assurance. A Tenth Anniversary Report from the Council for Higher Education Accreditation* (Council on Higher Education Accreditation, Washington, DC: 2008) 40.

<sup>7</sup> Note the critique that the president of CHEA, Judith Eaton, offers of the draft final report in CHEA mail 8.1 (February 22, 2012). Dr. Eaton emphasizes the necessity of reducing, rather than increasing the federal role in institutional improvement: “In contrast to the path of greater federal involvement proposed by the report, robust institutional and faculty leadership for quality and accountability builds on the strengths that have brought the higher education enterprise to where it is today and offers greater promise to students and society.”

**Financial assurance:** Currently, the federal government undertakes a baseline financial review to ensure institutional solvency. This review should continue with the understanding that the Department should enforce it stringently – refusing financial aid to students at those schools that are not financially sound. In addition, institutions should be required to post a statement, certified by an independent auditor, that they have sufficient resources to ensure that all enrolled students can be supported to the completion of their degrees. If that statement is not supplied, federal funds would be cut off.

**Consumer information on key measures of quality:** In the days before families could research institutions online, accreditation offered a voluntary seal of approval that said these colleges and universities offer a quality curriculum. But public information today is both cheap and simple. The existing system of largely opaque self-studies and reviews provides little information to the public and obscures whether or not institutions are doing a good job of educating their students.

To address the need for public accountability and quality assurance, institutions should be required to provide a set of basic information – much of which is already collected for the Department of Education’s College Navigator site – on their homepages (along with the certification described above) that will present in a clear and accessible format key data for quality and affordability:

- Tuition, fees, cost of attendance, net cost and available financial aid
- Degree programs offered
- Graduation rates, disaggregated by demographics; transfer rates as available
- Retention rates
- Student loan default rates
- Student outcomes: licensure test results (as appropriate); value-added assessments of collegiate skills, if utilized; job placement rates. Institutions may, at their discretion, include other information for consumers such as alumni and employer satisfaction data; graduate or professional school placement data; and the nature and requirements of their degree programs.
- Other data that the United States Congress deems appropriate
- Substantial penalties would apply to falsification of these metrics.

The Department of Education should also post the information on its website in an accessible and understandable way.

**Recommendation: Reduce the cost of higher education by eliminating the cost of federally mandated accreditation.**

In its recommendations, the majority concludes that accreditation is “cost effective.” In fact, it is not. Witnesses to NACIQI uniformly suggested that accreditation is contributing to the crippling cost of higher education. In testimony, Princeton Provost Christopher Eisgruber explained that the cost of federally-mandated accreditation often exceeds \$1 million for a single institution and hundreds of hours of staff time. Stanford Provost John Etchemendy argued that “accreditation is no substitute for public opinion and market forces as a guide to the value of the education we offer.”<sup>8</sup> We agree.

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<sup>8</sup> NACIQI received substantial testimony on the costs of accreditation. And many parties supported a comprehensive study of costs including ACE, AAU, Norwalk Community College and Bristol Community College. A motion calling for a specific study of the cost of accreditation was voted down on the grounds that the costs were self-evident. Yet the draft final report claims that accreditation is cost-effective.

Not only does accreditation raise costs, it also seriously undermines institutional autonomy. When Congress decided to make accreditors gatekeepers of federal financial aid, it did so in the belief that faculty and administrators would protect the autonomy of American higher education. In fact, a substantial number of witnesses—institutions currently accredited – argue that the accrediting staffs have started to substitute their own regulatory agendas for those of our colleges and universities.

In written testimony, Dartmouth President Jim Yong Kim raised concerns that accreditation staff often substitute their own judgment for that of an institution’s trustees and administrators.

Delinking accreditation from the gatekeeper role would address this problem. Congress should give institutions the freedom to use their own best judgment on how to carry out their educational objectives most effectively, provided that they make available to the public the data it needs to make informed choices. At the same time, accreditors would play an ever more important role in voluntary quality improvement.

**Recommendation: Break the accreditor monopoly.** The current regional structure of accreditation is “increasingly unsuited to American higher education” and can “constrain innovation, creativity, and improvement.” Those were the words of President Kim of Dartmouth and Princeton President Shirley Tilghman, and we are in full agreement. At a time when higher education is global in nature and geographic boundaries have been eliminated by the realities of the Internet, retaining the regional limitations will simply maintain anticompetitive cartels.

**Recommendation: Create a consumer-friendly expedited alternative.** Congress should, at the very least, create a consumer-friendly expedited alternative for reaccreditation, allowing previously accredited institutions to certify key information about financial solvency and key measures of quality (as outlined above).<sup>9</sup>

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At the present time, accreditation offers a misleading reassurance to the public that an institution that bears its seal of approval offers a quality education and good value for the investment of public and private funds. As such, it is an expensive, counterproductive system. The recommendations described above offer effective alternatives to those presented in the draft final report. Their advantages rest in making the key elements of consumer protection clearer and more accessible to the public, while setting accreditation free to resume its traditional role of encouraging best practices and continuous quality improvement.

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<sup>9</sup> In testimony submitted, a range of parties expressed interest in an expedited option including Princeton University, C-RAC, ACE, and AAU.

## **NEW ENGLAND COLLEGE OF BUSINESS AND FINANCE**

Dear Colleagues:

Thank you for the opportunity to comment on the final draft report which has now been formulated by NACIQI.

The issues undertaken by NACIQI were complex, and the final draft does an excellent job at explaining the context for the re-examination of the role of accreditation as a quality assurance measure for the public and as a method to insure the integrity of institutional participation in Title 4 programs.

It is this last component - gatekeeping to Title 4 participation - that provides the basis for any governmental intervention into the realm of accreditation.

Other than that, market forces, are sufficient to assure that accreditation maintains its appropriate role in quality assurance to the public. For example, if an accredited institution graduates students who are ill-prepared for employment, market forces will either demean the value of the accreditation or the institution – causing adjustments to be made to one or both.

However, with Title 4 programs, which are basically federal entitlement programs, there is governmental interest in assuring that reliance on accreditation, as a prerequisite to institutional participation, is doing an appropriate job.

As I have written previously, NACIQI would better serve higher education by recommending to the Secretary that Title 4 entitlements, like other federal entitlement programs, should focus on the recipient of the entitlement rather than on the service provider where the entitlement is expended. Student recipients for Title 4 entitlements can take up to 150% of the required time to complete a program; are able to aggregate massive loan amounts without earning academic credit by going from institution to institution; and do not have to demonstrate academic promise. Simply addressing these few factors would eliminate billions of dollars of wasted federal financial aid dollars.

To the extent, however, that the US Department of Education wishes to focus on accreditation as a gatekeeper for these entitlements, it should be noted that most accreditors do an excellent job and have responded to the recent overreaches that have occurred, particularly with some of the larger for-profit institutional higher education companies.

The excellence of the current accreditation system is borne out in the diversity and high-quality nature of higher education in America – which is still the envy of the world – attracting millions of foreign students each year. If there needs to be some modest reform to accreditation, so be it, but some of the wholesale change recommendations in the draft report - namely changing accreditation to work around sectorized institutions or to allow institutions to accreditation select (shop out of region) would be most inadvisable.

Regional accreditation, the current gold-standard in higher education, offers strong advantages over a sectoral or non-regional approach. It provides for the formation of academic community, enabling the easy sharing of best-practices; common curricular expectations needed for ease of credit portability; and efficient expenditure of time and resources in peer review. Even in the realm of online delivery, more than 70% of online students take courses from institutions proximate to their home, so these elements hold true with respect to this growing method of instruction. Our institution, for one, has benefitted immeasurably from all these accreditation elements, and now operates with high-quality academic programs, but at the lowest cost of any private higher education in New England and with the lowest percentage reliance on federal financial aid dollars.

Contrary to some of the implications in the draft report, regional accreditors have numerous methods to tailor accreditation to specific problem conditions through the use of progress reports; focused evaluations; strictures on program offerings; and, variable lengths in accreditation time-cycle. It is a highly flexible and adaptable system which works well to protect the public interest and to move institutions into continual improvement modalities.

To the extent there would need to be any change in this system, these would be much more modest in nature – a mend, not an end – to the current model. For example, regional accrediting bodies probably need to convene with more frequency to make decisions – perhaps through use of Executive Committee meetings, between fuller Board or Commission meetings. Regional accrediting bodies should be encouraged to use “masters” in the same way judicial bodies use such experts, if there are complex financial issues that are beyond the competencies of typical accrediting staffs or teams. But, the abandonment of such an excellent system of regional accreditation, to systems built around type of institution, or one without regional identity, is a solution in search of a problem. It is frankly, ill-conceived, and reactive to a set of conditions that has, for the most part, now been addressed through new Program Integrity regulations of the USDE and through modifications to accrediting practices, such as the adopting of a Special Monitoring Policy at NEASC for changes in ownership or control of institutions.

In conclusion, I would urge you to revise your final recommendation to the Secretary to allow current accreditation practice to continue, as is, but with an evaluation in three to five years as to whether there is a decreased incidence in misused, undervalued, or misapplied expenditures of federal financial aid dollars. At the same time, I would urge you to recommend changes to student eligibility to eliminate over-entitlement, fraud, and expenditure on students who are not college-ready.

Very truly yours,

Howard E. Horton, Esq.

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Howard E. Horton, Esq.

President

New England College of Business and Finance (NECB)

# NORWICH UNIVERSITY

## **FW: Written Comments regarding the draft final report on the reauthorization of the HEA**

Accreditation Committees

Sent: Friday, March 16, 2012 1:47 PM

To: Griffiths, Carol

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**From:** Richard W. Schneider [mailto:pres@norwich.edu]

**Sent:** Friday, March 16, 2012 8:30 AM

**To:** Accreditation Committees

**Cc:** Richard W. Schneider

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

I am writing to comment on the ninth recommendation of NACIQI's draft final report:

*9. Encourage a dialogue within the accreditation community about the structure and organization of the accreditation enterprise. The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector or other educationally relevant variable, than with geography. This dialogue may also afford institutions greater opportunity to choose among accreditors.*

My concern is that this is designed to remedy a problem that does not exist. There is no evidence that current regional accreditors are deficient in dealing with the diversity of their regional institutions. My experience with my own regional organization, NEASC, is that they smoothly and capably deal with a wide variety of institutions. To change from the current regional system to one that aligns more closely with mission or sector will create turmoil and likely result in a more complicated and expensive system; one that is less effective and less responsive. It would replace the current regional system with something that there is no reason to believe would be better but which would likely produce many unintended detrimental consequences.

There are no benefits identified for creating an additional system of accreditation to replace the current regional system that works well. In order to be considered, a proposed new system needs to be buttressed with evidence that it would be an improvement and described with sufficient detail so that its functions can be understood.

The suggestion that institutions will then get to choose among accreditors looks like an effort to allow marginal institutions to select an accreditor with marginal standards.

Richard Schneider  
President, Norwich University

# PRINCETON UNIVERSITY

February 29, 2012

Written Comments regarding the draft final report on the reauthorization of the HEA submitted by Shirley M. Tilghman, President, Princeton University

I welcome the opportunity to submit these comments in response to the NACIQI draft report: “Higher Education Accreditation Reauthorization Policy Recommendations.” I commend the Commission for conducting its work with openness and transparency, and for encouraging robust discussion within the broad higher education community. I appreciate your willingness to consider the concerns of colleges and universities about the accreditation process and to be open to new ideas that might address some of those concerns. The commitment of the Commission’s members to ensuring that the United States remains the world leader in higher education has been evident at every stage.

I strongly support the Commission’s recommendation that accreditors adopt an expedited review process for institutions with an excellent record of serving their students well. I also endorse the related recommendation to use the principles of risk assessment in establishing the nature and duration of review, such that the accreditors’ greatest efforts are focused on institutions that present the greatest potential cause for concern. (Recommendations 10 and 11) Implementation of these recommendations would reduce the costs and demands on well-performing institutions and allow accreditation agencies to devote more time and attention to poor-performing or newly established institutions.

I strongly support the Commission’s recommendation to place greater reliance on data that most directly reflect the career outcomes for graduates, including completion/graduation rates, licensure (where appropriate), job placement and/or other indices of career progress—and I would add alumni satisfaction. (Recommendation 17) These measures of educational effectiveness are significantly undervalued in the current standards by which institutions are judged for accreditation, and I applaud the commission for focusing attention on them. These measures would be among those that could be used in determining whether an institution qualifies for an expedited review.

I appreciate the Commission’s call for a dialogue within the accreditation community about moving from a region-based to a mission- or sector-based organization over time. (Recommendation 9) While I strongly support the view that the current diversity of educational institutions is highly beneficial to the U.S., I have argued that this diversity would be better served by a system of accreditation that is aligned more closely with mission or sector, rather than geography. As I explained in the testimony that I submitted in January 2011, different kinds of institutions can and do learn from each other, but it is unclear to me that exchanges of this kind happen through region-based accreditation. Peer review works best when standards are set that are

appropriate to the sector and reviews are conducted by individuals who have deep familiarity with the mission and organizational structure of the institution under review. I very much appreciate that a change of this magnitude may appear daunting, and if undertaken will require both time and commitment to achieve. Nevertheless I hope that the Commission's final report will include strong language in favor of such an outcome in the long run.

Finally, I am very pleased with the Commission's attention to the costs and intrusiveness of the accreditation process. This sensitivity is reflected throughout the document, particularly in Recommendations 13 and 14.

As you know, I have tremendous concerns that the current direction of accreditation is posing real harm to our system of higher education by infringing on the academic freedom of institutions with a proven record of excellence. I believe implementation of the Commission's recommendations can go a long way towards reversing this trend.

Thank you for your very thoughtful consideration of these issues that are of critical importance to our nation's future.

## **RHODE ISLAND COLLEGE**

### **FW: Written Comments regarding the draft final report on the reauthorization of the HEA**

**From:** Narodowy, Donna [mailto:DNarodowy@ric.edu]

**Sent:** Wednesday, March 14, 2012 11:49 AM

**To:** Accreditation Committees

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

March 14, 2012

To Whom It May Concern:

I have read with interest the NACIQI report and would like to comment on Recommendation #9, Page 5, which calls for a system of accreditation aligned more closely with mission or section rather than geography and offers a choice of accreditors.

As someone who is nearing the end of her career as a college president, I would like to share my multiple perspectives: I have been employed at community colleges, public and independent universities, and now by a public four- year comprehensive college. I have been in leadership positions within those institutions, and have been evaluated by state, regional and national accrediting or approval entities. My experience includes working on evaluation teams over many years. I have also been employed by a state approval agency and by a regional accrediting agency. In other words, I have had a unique view of accreditation and state approval in its many forms.

I was impressed with the committee's understanding of the strengths of regional accreditation and the importance of its role as gatekeeper of federal financial aid. I am writing because the committee has taken the time to listen and research.

I will not repeat the obvious advantages. I would like to turn instead to what is more difficult to see. Regional accreditation understands the message that financial aid comes from tax payer dollars, so institutions must be accountable. In the past two years, 20 percent of my time has been spent on working on my institution's self-study process. My college has been justifying to the public and my accrediting agency (NEASC) that I know the strengths of my college's outcome measures and its areas where improvement must be made. Thanks to NEASC, the public and everyone on my campus knows our strengths and areas of concern. We wrote a 100-page self-study that begins with data that are analyzed and then projections that are made regarding how we will improve. I would be glad to make available as evidence our self-study, which resulted from 18 months of discussions among over 100 stakeholders from on- and off -campus. I have also placed at the bottom of this letter a link to our 2012-2013 operational plan for next year that provides the items to be addressed as well as the timeline, necessary resources, and person(s) responsible. We take very seriously the need for

continuous quality improvement rooted in data gathering and analysis. We also respect the standards developed by our sister institutions.

Let me switch to my recent experience two weeks ago as chair of a NEASC visiting team at an institution in a neighboring state. Prior to the visit, I took a day away from my own campus to make a preliminary visit to the campus. Next, my team of seven expert administrators, whom I never met previously, communicated by conference call, and we reviewed all the institution's printed and web communications. When we arrived on campus as a team, we held discussions with individuals and small groups - over 200 people in all - to be sure the self-study and other documents fairly represented the institution and its ability to meet the eleven standards and scores of sub-standards. For three days, we got little sleep because at the end of each long day, we talked with each other about what we saw and heard. By the end of the visit, we returned home to complete a final team report of around 60 pages filled with a combination of recommendations and concerns -all of which require follow-up work by the institution - tempered with praise for what is being done well and should be continued. Why do we undertake such tremendous work as volunteers? Why do team members and chairs, who are evaluated - and only the best re-invited to serve - give up weeks of their time? We do so because we learn from each other and because we can see institutions improving through the process.

Would I volunteer to serve on a team in California? No, because I do not know their state agencies and the travel would be one more complication in my busy schedule. You could hire my hands and my head if paid enough, but you would not get the devotion I feel toward my own region.

When I became a new president, I pulled out the institution's previous accreditation reports to see what needed to be done. The regional standards, in which we have confidence, have been for me and many other presidents the guide for improving our institutions. I have worked with national accrediting agencies over the years, too, but felt that they were businesses and, as such, lacked the pride of ownership so prevalent with regional accreditation.

Thank you for listening and for caring about the future of higher education.

Sincerely,

President Nancy Carriuolo, Ph.D.

## SAINT ANSELM COLLEGE

### **FW: Written Comments regarding the draft final report on the reauthorization of the HEA**

Accreditation Committees

Sent: Friday, March 16, 2012 1:41 PM

To: Griffiths, Carol

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**From:** Jonathan DeFelice [mailto:JDeFelice@Anselm.Edu]

**Sent:** Wednesday, March 14, 2012 4:23 PM

**To:** Accreditation Committees

**Cc:** Jonathan DeFelice

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

14 March 2012

Dear Members of the National Advisory Committee on Institutional Quality and Integrity:

I am writing to comment on the NACIQI Draft Final Report: Higher Education Accreditation Reauthorization Policy Recommendations.

First of all, I express my thanks to the Committee for their work in advising the Secretary of Education on the important issue of Institutional Quality and Integrity.

Specifically, I would like to comment on Recommendation 9 on page 5 that suggests that “The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector or other educationally relevant variable, than with geography. This dialogue may also afford institutions greater opportunity to choose among accreditors.”

As I said in an earlier comment, I have been President of an institution during three decennial accreditation visits, have served on the Commission on Institutions of Higher Education for the New England Association of Schools and Colleges, and have served on numerous accreditation visits of institutions both small and large, domestic and overseas, for-profit and not-for-profit. I have a fairly long and broad appreciation for the regional accreditation process and the work it does to both protect the public interest of higher education in the United States and to improve institutional quality in significant ways. I am, therefore, opposed to any moves by the federal government to eliminate or reduce the role regional of accrediting agencies.

The regional system of accreditation makes the process both more accessible and less expensive for institutions to be involved with and to be well-informed about the meaning and significance of accreditation. It is an assurance as well, that institutions within a geographic region are known to share the same standards and expectations and provides an ease of use for students transferring from one

institution to another or who wish to pursue a higher degree from one institution to another.

In addition, regional accreditation does an excellent job of promoting and sharing best practices among institutions through team visits, conferences, and workshops at a very reasonable cost to all institutions in the region. Currently the regional accreditation agencies have a manageable portfolio of states and in New England certainly a manageable number of institutions. Translated to a national scale, it is difficult to image that the depth of knowledge of institutions and their quality could ever be replicated. The same could be said about the knowledge of state issues related to accreditation.

Without doubt the replacement of regional accreditation model would put significantly increased costs on the institutions for a result that would be, in my estimation, something of lesser quality. The overhead and staffing costs of any national accreditor would again be significantly higher than the regionals and would be transferred again back to the participating institutions.

The suggestion that institutions would have greater flexibility to choose among accreditors is opening a door for institutions that may not be especially sound to “shop around” for someone who will say “yes” rather than for an organization that is known and tested in the region as the greatest guarantor of quality.

The system of peer review that the regional accreditation process has provided successfully over decades and decades should not be eliminated or reduced. It remains our best option for effecting both public accountability and institutional improvement.

Please understand that with the reauthorization of the higher education act, I would not support any movement to eliminate or reduce the influence and effectiveness of regional accreditors.

With every good wish, I am,

Sincerely,

Jonathan DeFelice, O.S.B.  
President  
Saint Anselm College  
Manchester, NH 03102  
(603) 641-7010

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Father Jonathan DeFelice, O.S.B.  
President  
Saint Anselm College  
Manchester, New Hampshire 03102-1310  
603-641-7010  
<https://email.ed.gov/OWA/redir.aspx?C=81a1ae14f7b84472a49435f6c66afeb6&URL=mailto%3ajdefelice%40anselm.edu>

# SMITH COLLEGE

## **FW: Written Comments on the Draft Final Report Authorizing the Reauthorization of the HEA**

Accreditation Committees

Sent: Friday, March 16, 2012 1:42 PM

To: Griffiths, Carol

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**From:** Carol Christ [mailto:cchrist@smith.edu]

**Sent:** Wednesday, March 14, 2012 4:05 PM

**To:** Accreditation Committees

**Cc:** Yuan, Georgia

**Subject:** Written Comments on the Draft Final Report Authorizing the Reauthorization of the HEA

To whom it may concern:

I have just reviewed the draft report from NACIQI on changes to accreditation to be considered in the next reauthorization of the HEA. I have been serving on a task force co-sponsored by the AAU and ACE on accreditation, so that I have spent several months studying and reflecting on the issue. I am deeply concerned about the recommendations in the NACIQI report in regard to accreditation. The regional system of accreditation has these advantages:

- The system makes it easier and less expensive for institutions to be involved and informed about accreditation.
- Having all of the institutions within a geographic region share the same accreditor is helpful for students transferring or for students who wish to advance to the higher degree.
- Regional accreditation promotes the sharing of good practice through team visits, conferences and workshops – all at a reasonable cost.
- Accreditors deal with a manageable number of states, and in New England, a manageable number of institutions.

My fear is that sector accreditation and/or letting institutions choose across regions would:

- Weaken peer review through increased travel or lack of boundary-crossing;
- Increase the cost to institutions for travel and for the overhead required by accreditors to deal with institutions from up to 50 states;
- Lead to increased staffing by accreditors to manage increased state relations and account for greater distances to visit member institutions.

Sincerely yours,

Carol Christ  
President  
Smith College

## UNIVERSITY OF BRIDGEPORT

**FW: Written Comments regarding the draft final report on the reauthorization of the HEA**

Accreditation Committees

Sent: Friday, March 16, 2012 6:26 PM

To: Griffiths, Carol

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**From:** Hans van der Giessen [mailto:inf@bridgeport.edu]

**Sent:** Friday, March 16, 2012 4:26 PM

**To:** Accreditation Committees

**Cc:** 'Neil Albert Salonen'; 'Stephen Healey'; bbrittingham@neasc.org

**Subject:** Written Comments regarding the draft final report on the reauthorization of the HEA

As Provost of a regionally accredited institution, I would like to offer the following Written Comments regarding the draft final report on the reauthorization of the HEA.

In addition to our institution being regionally accredited, the University's programs are accredited by state of Connecticut, and most professional programs also are accredited by relevant professional associations. In most instances, the current system of accountability is effective and beneficial to the University. I encourage caution before revising the existing arrangements, especially where doing so might inadvertently increase redundancy and add burden to reporting requirements.

Peer review by region has the benefit of focusing travel to a defined geographical area. Costs associated with travel (universities pay to send their staff to meetings, and pay costs associated with visiting teams) are significant. There is little benefit to increasing these costs, especially when the current system of regional accreditation is working well.

Regional accreditation has been responsive to changes within the academy, and thus has developed new ways of reviewing institutions to ensure that they meet accreditation criteria. This suggests caution before undertaking to develop new structures and practices which, though intended to address problems, may actually accomplish little, but may increase workload for already well-reviewed institutions.

Sincerely,

Hans van der Giessen, Ph.D.

Provost and Vice President for Academic Affairs

University of Bridgeport

Bridgeport, CT 06604

USA

telephone: 203-576-4668 fax: 203-576-4676

email: [hvdg@bridgeport.edu](mailto:hvdg@bridgeport.edu)

# UNIVERSITY OF HARTFORD

**FW: Written comments regarding the final draft report on the reauthorization of HEA**

Accreditation Committees

Sent: Friday, March 16, 2012 1:47 PM

To: Griffiths, Carol

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**From:** Walter Harrison [mailto:horiky@hartford.edu]

**Sent:** Thursday, March 15, 2012 9:13 PM

**To:** Accreditation Committees

**Subject:** Written comments regarding the final draft report on the reauthorization of HEA

March 16, 2012

Dear Secretary Duncan:

I write to express my concerns with recommendation nine in the NACIQI report. I do so from my perspective as a college president who has chaired three NEASC accrediting teams over the past twelve years and who leads an institution that has undergone two NEASC accreditations during my tenure, including one during the current academic year.

I think it is fair to say that no institution actually enjoys the accreditation process. The cost, both in dollars and human hours, is considerable and the stakes are as high as they get. However, it has important, undeniable benefits. I think the current accreditation system is rigorous and requires a significant amount of institutional self-reflection and measurement, benefits that are available through no other such process. I fear that this recommendation will dilute the benefits and drive up the cost.

Accreditation affords us the opportunity to look openly and carefully at ourselves, assess our strengths and weaknesses, and strengthen our evidence based approaches to continuous improvement. It also allows us to think carefully about our mission and how we meet and/or pursue standards in our own unique way. That process is greatly aided by an accreditation process that engages reviewers from institutions with diverse missions, bringing their different perspectives to a common set of standards. And while the idea of developing standards based on institutional type has some appeal in the abstract, the actual task of sorting out the ways that these various institutions are similar to and different from one another will be enormously time consuming and difficult.

If geography is to be abandoned as the determiner of an accreditor, then team members will likely be travelling from greater distances, a cost that will be born directly by the institutions. The administrative burden on accreditors to manage relations with a wider range of states will drive up their operating costs, and those costs will also likely be passed on to institutions.

Finally, the notion that institutions might be able to choose their accreditors, depending on the parameters of those choices, runs the risk of eroding the quality control and continuous improvement functions of accreditation. We might like to think that institutions will choose based on their missions, but they will inevitably also choose based on expense and the perceived ease of meeting the standards.

Regional accreditation is a rigorous process that contributes in important ways to the internationally recognized dominance of our system of higher education. I fear that recommendation nine will severely weaken the ways in which we review and measure our institutional effectiveness.

Sincerely,

Walter Harrison  
President  
University of Hartford