



November 18, 2011

Dr. Eduardo Ochoa, Assistant Secretary For Postsecondary Education
U.S. Department of Education
Office of Postsecondary Education
1900 K Street, NW, Room 8060
Washington, D.C. 20006

Dear Secretary Ochoa:

In recent months, the idea of higher education institutions becoming accredited by a major regional accrediting agency has come under fire. It is being suggested that these external agencies are not doing enough to ensure that colleges and universities are being transparent and being held accountable for compliance with government regulations including student aid eligibility.

The NACIQI Discussion Draft dated October 18, 2011 suggests three options for moving forward in linking the federal government to external accrediting agencies and attempting to find a process that works for all interested parties. While I am confident that these options were thoroughly discussed and researched, it appears as though the suggestions would only complicate matters for higher education institutions. Specifically in Option C, colleges and universities would first need to be reviewed by the federal government to determine compliance with federal financial responsibilities and performance measures. Once jumping this hurdle, institutions would have to either pursue additional performance measures determined by the federal government or pursue accreditation from a third party, such as a regional accrediting body to retain the institution's Title IV funding.

This particular option would seem to indicate that an extra step has been added to the process, thus making the process more cumbersome. It remains unclear as to the potential unintended consequences of allowing institutions to choose between the federal government and a regional accrediting agency. Furthermore, in Section II, Option 12, educational institutions could select any "approved" accrediting association no matter the geographical location. As an educator, this leads to the potential for institutions seeking accreditation based on individual needs which could lead to low performing institutions selecting agencies that might be open to less rigorous accreditation standards.

Furthermore, all options illustrate the importance placed on institutional fiscal responsibility and performance measures, rather than on the merits of educational quality. None of the options indicate how they benefit students who wish to successfully complete educational objectives and are correspondingly able to secure adequate employment. The primary issue rising above the din of the discussions is what is best for students who attend America's world class institutions.

Having been associated with regional and global accreditation for more than two decades, I have found that the Higher Learning Commission responsibly carries out two major roles regarding accreditation by 1) understanding and honoring the individuality of the higher education institutions it accredits, and 2) validating the Commission's principles and criteria leading to the provision of a quality education for students.

I have been an advocate of non-prescriptive forms of accreditation, which honors the uniqueness of all of America's higher educational system and sets the foundational framework for ensuring the provision of high quality teaching and learning environments for its faculty and students. Thank you for the opportunity to respond. I wish you well with your continuing deliberations.

Sincerely,

A handwritten signature in black ink that reads "Michael R. Chipps".

Michael R. Chipps, Ph.D.
President

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