

22 November 2011

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

I am writing to comment on the NACIQI Discussion Draft: Higher Education Accreditation Reauthorization Policy Considerations.

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. In particular, I offer my support of Options to Consider 16 and 17 on page 9 of the draft document. I believe both of these options will enhance the central work of our institutions, namely the quality education of our students.

While I do not support a “national unit record system” I believe that the ideas in Options 20-24 of the draft could be implemented with a view toward the mission of each individual institution. This would best be accomplished by accreditors, not the federal government.

I am concerned about Option 27 that would require accreditation reports to be available to the public. While I appreciate the concern for transparency in the process, I believe that this would best be determined by the accreditors and institutions themselves rather than by a requirement of the federal government.

Having been President of an institution during three decennial accreditation visits, having served on the Commission on Institutions of Higher Education for the New England Association of Schools and Colleges, and having 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 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 of accrediting agencies.

We have been fortunate in the United States to be free from a “Ministry of Education” model for institutions of higher education and we have allowed the wonderful tapestry of independent and public institutions to flourish. This has occurred because institutions have developed their own specific missions and their commitment to providing quality education to students and accreditors have held them accountable for delivering on their promise. Any attempt to measure institutional quality without regard for mission, or to measure success by purely numeric outcomes would cause significant damage to the breadth of educational opportunities that our country now enjoys.

With that in mind, I offer my strong opposition to any initiatives by the federal government to eliminate or reduce the role of accreditors as reliable authorities on the quality of education. In particular, I would like to register my opposition to both “Option to Consider B” and “Option to Consider C” on pages 3-5 of the Discussion Draft.

As I indicated above, I believe that the role of accreditors has been as increasingly important one in both assuring the public of the quality of an institution and in helping an institution to better deliver on the promise of its mission. In a higher educational system that is as varied and complex as the one we have in the United States, and which involves in the government expenditure of large amounts of student financial aid, there is no doubt that the federal government needs the assurance that its investment is resulting in sufficient quality that graduates of our colleges and universities will be in a position to secure employment that will allow them to repay their loans. There is the necessity for the twin assurance that our colleges and universities are providing the level of quality education that will produce a citizenry committed to sustaining and advancing our democracy, whether they chose to be directly employed or whether they choose to be parents at home or committed to religious ministry. Graduates need to be good citizens, equipped with the necessary skills for lifelong learning and activity, in their local and national communities. Judgments about an institution's suitability to qualify for Title IV funding cannot be based solely on an institution's financial capacity but rather on its demonstration that it is producing graduates who are educated and engaged members of society.

While financial metrics are important, no set of them, however excellent or sophisticated, can tell the whole story about a college or university. They cannot, alone, determine the educational quality of institution and hence its eligibility to participate in federal financial aid programs. A system of "inspection" will not determine the quality of an institution of higher education nor should it be expected to do so. Rather, what is needed is a system that involves the cooperation, interest, and involvement of academic experts and institutional leaders. That means a system of peer review that the accreditation process has provided successfully over decades and decades and that should not be eliminated or reduced if it is to remain an effective agent of both public accountability and institutional improvement.

The attempt to establish federally defined "performance measures" is again, I believe, a threat to the current diversity of American higher education, and an assault on long-established and proven missions particularly of independent colleges and universities. I register my opposition to any such direction that inevitably would take us down the path of the federalization of higher education.

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 accreditors. Please respect our diversity.

With every good wish, I am,

Sincerely,

Jonathan DeFelice, O.S.B.
President
Saint Anselm College
Manchester, NH 03102