



1307 New York Avenue, NW • Fifth Floor • Washington, DC 20005-4701
202.293.7070 • fax 202.296.5819 • aascu.org

November 25, 2011

Ms. Melissa Lewis
Executive Director
NACIQI
U.S. Department of Education, Room 8060
1990 K Street, NW
Washington, DC 20006

Dear Ms. Lewis:

On behalf of the 400 institutions and nearly 4 million students represented by the American Association of State Colleges, we write to convey our views on the National Advisory Committee on Institutional Quality and Integrity (“Committee”) Discussion Draft (“Draft”) issued Oct. 18, 2011. We request that the Committee associate AASCU’s comments with those expressed in the letter sent by the American Council on Education on behalf of the higher education community. We thank the Committee members for serious nature of work they provided to honor the Secretary’s request. In addition, we would like to call attention to the work now underway by National Task Force on Institutional Accreditation. In FY 2012, they will complete their report supporting voluntary peer-reviewed quality assessment with actionable recommendations and appropriate relationship to the federal government. We expect that the work of the Commission will be useful in future deliberations of NACIQI in their efforts to provide recommendations to the Secretary.

AASCU continues to support the principles espoused in the attached Statement from President Muriel Howard submitted at the February 2011 National Advisory Committee on Institutional Quality and Integrity (NACIQI) Meeting. In addition, we provide these comments in response to the Draft for your consideration. In general, we support the existing system of accreditation, acknowledging the movements of the accreditors to improve the accreditation system as institutions of higher education adjust their processes to accommodate changes in mission, curriculum, faculty, facilities, fiscal and administrative standards, student services, and output measures.

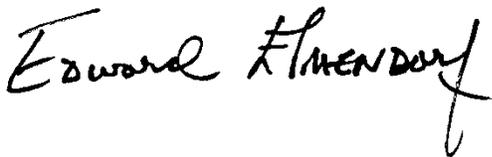
AASCU supports an appropriate role for accreditation to play in determining Title IV eligibility. We believe that the process for accrediting agency recognition established by the Congress in the Higher Education Act continues to serve students attending public institutions well, and we support continuation of accreditation for determining institutional eligibility for student aid under Title IV. Further, the Draft discusses the role of states. We do not believe there is a basic conflict between state authority and interest and accreditors' review. The state role should be focused on consumer protection shared with the federal government.

While there is certainly tension, as noted in the Draft, we do not believe that the accreditation peer review process presents unmanageable conflicts with the Department's gate-keeping function. However, the bulk of the gate-keeping function should remain with the Department and not thrust on to accrediting agencies. NACIQI, we assert, has no role for determining "in some tangible fashion" an institution's overall performance. The statute in sec 496 (o) and (p) clearly limits the abilities of the Secretary from establishing standards and vests this responsibility with the institution and accrediting agency. Thus, it would be completely unacceptable for NACIQI to presume this role.

We do not believe that the accreditation process is unduly intrusive and prescriptive in ways that may not match institutional priorities, and we do not support substantial modification to the existing statutory and regulatory criteria to make them less intrusive and prescriptive.

In general, accreditation is working; however AASCU recognizes that improvements are necessary. We believe that these improvements will only happen when accrediting agencies are relieved of their burden of federal enforcement. Thank you for your attention to these items and the opportunity to submit them.

Sincerely,

A handwritten signature in black ink that reads "Edward M. Elmendorf". The signature is written in a cursive, slightly slanted style.

Edward M. Elmendorf
Senior Vice President of Government Relations and Policy Analysis
American Association of State Colleges and Universities

Attachment