

Response to the NACIQI Discussion Draft:

Higher Education Accreditation Reauthorization Policy Considerations

I am writing in response to the October 18th document and do so from multiple vantage points: as the President of Southern New Hampshire University, as a former member of the NEASC Commission on Higher Education (where I gained a detailed and inside view of the process), as a frequent Visiting Team Chair, and as someone who has just experienced a full Ten-Year Reaccreditation visit to my institution. I would also say that SNHU is one of the more entrepreneurial non-profit universities in the country with a growing online program, so we think hard about quality and the regulatory environment and our mission to serve more students in new, more cost effective models.

On a more personal note, I also write as a supporter of this administration. My wife and I hosted then Senator Obama in our home during his campaign, he spoke at the university and received an honorary degree, and I respect the goals the President has set forth regarding the education of more Americans. I cite those goals frequently as we extend our degree programs to more students in more places, including active duty military.

My main concern with the draft is the diminished role of regional accreditors that it effectively posits and the over-simplification of assessment that is implicit in the various alternative models it proposes. One of the strengths of American higher education is the diversity of institutional types and missions and cultures we offer. Institutions, whether big or small, are complex organizations and they resist easy or facile analysis. Often, large and well financed institutions do a poor job at educating undergraduates while smaller, underfunded institutions demonstrate passionate transformative learning. No set of financial indexes can delve below the surface to uncover the reality of an institution and certainly do not offer much insight into quality. Peer review, on the other hand, can provide the financial analysis the government desires *and* a nuanced understanding of what is really going on at a campus.

The regional accreditors have responded with some energy to the concerns raised by the department over the last years. I know firsthand the difference given our recent self-study and visit. We provide much more data now than we once did and much more analysis around that data, especially as they provide insight into quality measures. Our eight-person team was detailed and thorough during their three days on campus. It is clear to me that the accreditors have responded energetically to the calls for more rigor in the review process and we are better for it.

In terms of the process being expensive or intrusive, I would support option 17, to undertake substantial modification to the existing statutory and regulatory criteria to make them less intrusive and prescriptive. I am less worried about the cost of accreditation, frankly, though I have peers that would support option 16, to look at the cost.

I think my biggest worry is that much of what I see in the draft moves us towards effective federalization of higher education, threatening and oversimplifying what has been one of our central strengths. For that reason, I strongly support options 20 to 24 because they strengthen our commitment to the diversity of institutional missions and maintain the vital role of our regional accreditors. I often travel

abroad and in one country after another I see rigid, bureaucratic higher education systems with slow moving and antiquated central control. In those systems there is more standardization and that has its benefits, but those benefits are outweighed by a lack of innovation, energy, and forward thinking. My peers at those foreign institutions envy us.

Do we need to be better? Absolutely. However, higher education is responding like never before and we are seeing dramatic change, new delivery models, and a focus on quality (and the data that supports it). My fear is that the move to a more federalized system of higher education will squelch the spirit of reform and change that is now sweeping the country and substitute an inadequate form of review for a model that is actually working better and better and that has the trust and respect of the higher education community.

Thank you for allowing me to share my thoughts.

Sincerely,

Paul LeBlanc

President

Southern New Hampshire University