

After consultation with the Provost and Vice President for Academic Affairs, as well as the Dean of Arts and Sciences, I offer the following comments regarding the draft report on the reauthorization of the HEA: Options B, C, 2, 3, 6, 7, 11, 17, 19, 27

Option B: From my perspective as the president of a regionally accredited university, I object to provisions entailed in Option B. The current system linking Title IV eligibility to accreditation works relatively well and is more likely to vouchsafe quality (and return on investment of federal dollars) than a litmus test of ‘financial integrity’, regardless how it is defined. Regional accreditation standards are concerned with financial sustainability, but set finance within a broadly defined context that includes reference to an institution’s mission and purposes, evaluation and governance mechanisms, programs, faculty, students, physical and technological facilities, and the integrity of its communication with prospective students, state and federal authorities, and the general public. Option B indicates that peer review introduces ‘to an academic peer review enterprise a policing function that it may be neither willing, nor fully competent, to undertake.’ As the university president of an institution that has undertaken several self-studies and been evaluated through regional accreditation peer review, and as a participant (and chair) of several accreditation teams focusing on other institutions, I hold that accreditation self-study and peer review are not seen as policing functions, but shared, cross-institutional commitment to maintaining academic quality, where this is understood to be uniquely offered in a wide variety of academic settings for a diverse array of students. Peer review is not perfect, but it is preferred to the singular focus on financial integrity entailed in Option B. In my experience, peer review has been helpful to institutions as they seek to continuously improve the academic programs they offer to students.

Option C: This option is vague on specifics, but its proposed primary focus on financial integrity (the presumed meaning of the phrase ‘stepwise fashion’) overlooks the fact that financial integrity is a dimension of a larger picture. Without diminishing the role of finance in ensuring the sustainability and quality of an institution, the current system linking Title IV funds eligibility and regional accreditation is preferred to Option C. As the comment above indicates, financial integrity is best understood within a larger institutional context. Nor does it make sense to abstract these levels (Section II, Option 3) and accord dimensions of them to different actors and jurisdictions; that is likely to lead to conflicts and redundant reporting requirements. The current approach to regional accreditation will not be improved upon by Option C.

Section II sets forth options ‘if financial aid eligibility remains linked to accreditation.’ I offer the following comments:

Option 2: Improved coordination and increased coordination among actors may well be valuable.

Option 3: I do not see the advantage of ‘assigning financial issues...exclusively to the federal level.’ Insofar as financial issues are integrally related to other factors, each member of the triad has some legitimate interest in and jurisdiction over matters of finance.

Option 6: There is merit to evaluating ‘the ways in which state regulation diversity ... might be shaped to incorporate recognition of the growth of cross-state (and, indeed, cross-nation) educational activity.’ In particular, it will be burdensome should an institution need to seek approval from the states severally to offer academic programs by way of distance of delivery. Some evaluation of various state mechanisms, and development of federally recognized reciprocal arrangements might mitigate this burden.

Option 11: In my view, regional accreditation addresses diversity in a satisfactory manner. Participants in peer review are selected based on knowledge of discrete types of institutions.

Option 17: The intensifying demands of regulatory compliance are burdensome to institutions, and ‘substantial modification to the existing statutory and regulatory criteria to make them less intrusive and prescriptive’ would be welcome. Many of the elements of regulatory compliance can be accorded to

mechanisms of regional accreditation, and it would be welcome to eliminate redundancies entailed in the multi-jurisdictional approach institutions currently face.

Option 19: Sharing data is a good idea, and it follows from the principle that these data are owned by the people and should be shared with the various agents and entities they create.

Option 27: A regional accreditation self-study is presently undertaken with candor because its analyses are not made public. The intention of Option 27 is positive, but the result is likely to have an unintended consequence. If an institution's self-analysis and those of its peers are made public, such reports will be subject to the pressures of impression management. They also will be drawn to politicization and subject to increased litigation. The current system does have mechanisms to indicate that an institution has failed to meet accreditation standards, and these are sufficient.

Neil Albert Salonen
President
University of Bridgeport