

Dear Members of NACIQI:

The purpose of this message is to submit comments about the Draft Report, "Higher Education Accreditation Reauthorization Policy Considerations," by the National Advisory Committee on Institutional Quality and Integrity (NACIQI). As President of Bristol Community College (MA), I thought it might be helpful for you to consider an institutional perspective. This topic focuses directly on the lifeblood of our mission. As the Draft states, "it is necessary that member institutions be sufficiently involved and invested in understanding the issues, arriving at self-regulatory solutions, and establishing principles to ensure institutional compliance" (Page 2).

Overall, this Draft Report advances the discussion of critically-important issues. I congratulate the participants for producing this first-rate work. Here are some specific comments that I offer for consideration:

- Pages 3-5: **Option B**, "separation of accreditation from the federal aid eligibility process"; and **Option C**, "modification of the linkage between accreditation and institutional eligibility."

At Bristol Community College last year (FY11), nearly two-thirds of our students (5,980) received federal financial assistance that amounted to \$22.3 Million. As with all public monies received at Bristol CC, I maintain that these taxpayer dollars constitute a public trust. This trust relies almost exclusively on accountability and its companion piece, accreditation. These constitute the touchstones to public confidence. Of course, assessment buttresses accountability at our institution. How else could we provide reassurances about the prudent stewardship of public (and other) funds?

In my view, this large amount of federal financial aid available to Bristol CC students requires assurances about the quality of the educational experience those students receive. Our students need an education of the highest quality to gain meaningful employment, to become ethical citizens contributing to society, and to pay their loans.

Consequently, I believe that judgments about participation in Title IV funding should not rely almost exclusively on the financial condition of our institutions. In my view, institutional eligibility must also incorporate the qualitative measures about accountability/assessment that embody accreditation standards. And--here's one of the best parts--the accreditation apparatus and its system of voluntary peer review, whether through national, regional, or "discipline-centered" experts, currently exists and is functioning effectively; thus, I suggest that we already hold high-performing levers for not only determining institutional eligibility but also providing assurances about accountability to the public. Please, let's make use of these existing valuable tools without pursuing a new, untried experiment.

Page 9: **Option to consider "16:"** "Undertake a comprehensive study of the costs of the accreditation process"; **Option to consider "17:"** "Undertake substantial modification

to the existing statutory and regulatory criteria to make them less intrusive and prescriptive”; Option **to consider “18:”** “Reconsider data that are collected by all accreditation, state, and federal agencies. In this reconsideration, evaluate the costs of data collection relative to its utility”; **Option to consider “19:”** “Wherever possible and of value share data provided to and analysis conducted by the federal government (e.g., regarding institutional financial responsibility) to assist accreditors in reviews and risk assessment”; and **Option to consider “20:”** “From the above study of data and the costs, define a specific set of data that is needed as a minimum to address (a) federal interest and/or (b) institutional improvement.”

Collectively, these options can help ease administrative burdens on the institution. Bristol Community College, for example, devotes what I consider an inordinate amount of time, talent, and treasure assembling and reporting an ambitious array of accreditation-related data. Of course, we must continue to rely on data, particularly data-based performance measures, to demonstrate our accountability and quality; however, these considerable institutional efforts should be streamlined and organized for these core purposes. It is unproductive to assemble a labyrinth of data that can actually wield deleterious effects by trespassing beyond “the useful” and stupefying the public. In addition, perhaps it would be helpful to clarify exactly what (and how much) data are actually required by national, regional, state, and local mandates.

- Pages 9-10: **Options 21-24**

While I applaud the concept of commonly used data points, these should be designed to complement the rich range of institutional missions. This, of course, further emphasizes the key role of accreditors in making such determinations, not federal observers. Accordingly, I emphatically urge the NACIQI against support for a federal test.

- Page 10: **Option 27,** “Accreditation reports about institutions should be made available to the public.”

I suggest that this matter of Transparency constitutes a decision best made by the institutions and accreditors rather than a requirement of the federal government. Mandates always suppress flexibility and sound judgment when unique “local” circumstances arise. As the Draft Report points out, “the federal government should not be in the business of engaging in the institutional self-improvement enterprise” (Page 3).

Thank you for this opportunity to submit my ideas and suggestions in this important initiative. If you have any questions, please do not hesitate to contact me.

Cheers!

Jack

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