

Dear Members of NACIQI

I would like to provide comment on the draft report on the reauthorization of the Higher Education Act.

There are several points that I would like to make concerning this issue. In my opinion, the United States has the highest quality higher education system in the world, due in large part to: the diversity and autonomy of higher education institutions; the effectiveness of regional accreditation; and the lack of federal government interference.

The draft of the reauthorization document proposes several different options. "Option A" would use accreditation to ascertain eligibility for Title IV funding. While it does not expressly state "regional accreditation" I believe it should, as other accreditations are not as rigorous.

"Option B" would sever accreditation from federal aid eligibility and possibly just use criteria of financial integrity. Financial integrity is necessary but insufficient. It is important that educational value is provided. This value is best ascertained by regional accreditation. In my opinion, Option B is insufficient.

"Option C" links quality assurance and financial integrity. If the quality assurance were federal impositions, bureaucratic impediments to diversity and creativity would result. It could federalize higher education and threaten institutional autonomy and diversity. In my opinion, Option C is flawed.

I support the federal government in being good stewards of taxpayers' money. This is best done by using what is already in place for ensuring quality - regional accreditation. Federal financial aid resources should be available to organizations that are providing a sound and complete education and have the financial resources to ensure that they will be around in four years to graduate the incoming class. I think the government is capable of making the assessment on the financial adequacy (and currently does) and should continue to rely on regional accrediting bodies to assess academic competency.

Further, I feel that Regional accreditation organizations should not be changed into federal enforcement agencies or made liable for individual institutions. Doing so would pervert and inhibit the best role of these organizations.

Norwich strongly supports "Option to consider 17: Undertake substantial modification to the existing statutory and regulatory criteria to make them less intrusive and prescriptive." These criteria are unnecessary and counterproductive. Higher education

in the U.S. has excelled without these criteria. The world markets tell us they want to send their students to American higher ed institutions for their education, and regulatory compliance consumes limited resources and jeopardizes two centuries of our previous success.

Thank you for your consideration with these important issues.

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