

November 23, 2011

Written comments submitted by Shirley M. Tilghman, President, Princeton University, regarding NACIQI draft report on accreditation

I welcome the opportunity to submit these comments in response to the NACIQI discussion draft: "Higher Education Accreditation Reauthorization Policy Considerations." I commend you for the openness and transparency of the drafting process. I appreciate the receptiveness of the commission to concerns expressed by colleges and universities about the accreditation process and to new approaches that might address some of those concerns. Many of the options set forth in the draft are of interest to Princeton. I would cite specifically the commission's sensitivity to the costs and intrusiveness of the accreditation process, its openness to the concept of expedited reviews, its emphasis on real measures of educational effectiveness rather than one-size-fits-all outcome standards, and its willingness to at least consider a total revamping of the organization of the system.

Section 1: Should the linkage between accreditation and Title IV fund eligibility remain?

Those who support the current system, in which regional accreditation is linked to eligibility, emphasize the value of maintaining verification of basic standards of institutional quality and integrity as a non-governmental function. The merits of this approach depend upon how the accrediting agencies carry out their responsibilities. They must be willing to suspend accreditation of failing institutions, and at the same time respect the academic freedom of sound institutions. Judgments regarding curriculum and approaches to assessing student learning should, in our view, be made by the teaching faculties of successful institutions, not by accreditors. American higher education will be just as damaged if non-governmental agencies infringe on academic freedom in certifying eligibility for Title IV funding as if the government takes those actions directly.

If the current system cannot carry out its responsibilities without risking damage to institutional quality and autonomy, then we believe it would be better to sever the link between accreditation and institutional eligibility for Title IV funding and allowing the accrediting agencies to focus on peer review and institutional improvement. This step would have to be taken very carefully to ensure that the government's eligibility standards did not put the government in the position of imposing excessive requirements or usurping institutional responsibility for making academic judgments.

The discussion draft notes that versions of option B or C might require the federal government to set standards that extend beyond financial integrity. I would recommend basing the standards on the considerations outlined in option 21. That option recommends a data set that

focuses on such outcomes as completion/graduation, licensure (where appropriate), job placement, and/or other indices of career progress – measures of educational effectiveness that are significantly undervalued in the current standards by which institutions are judged for accreditation.

Section 2: Observations and options if aid eligibility remains linked to accreditation

As the commission knows, I strongly support the view outlined in option 1 that diversity of educational activity and mission is healthy, and that this diversity would be better served by a system of accreditation that is aligned more closely with mission or sector, rather than with geography. As I explained in the testimony that I submitted in January 2011, different kinds of institutions can and do learn from each other, but it is unclear to me that exchanges of this kind happen through region-based accreditation. The rationale for sector-aligned accreditation is that peer review processes work best when institutions are reviewed by representatives from institutions that are similar in mission and organizational structure.

I have testified in strong support of a system that allows accreditors to design procedures for expedited review (option 14), but with the understanding that the data requirements would focus on those items outlined in option 21, including completion/graduation rates, placement, and/or other indices of career progress, and alumni satisfaction data. I endorse the principles of option 13, which would allow for the review process to incorporate notions of risk assessment in establishing varied levels and durations of review, such that the greater review effort is focused on institutions that present the greatest potential cause for concern. Both options 13 and 14 (perhaps a combination of the two) would allow for a reduction in the costs and demands on well-performing institutions and allow accrediting agencies to devote more time and attention to poor-performing or newly established institutions. Attached below are some thoughts about how a system based on options 13 and 14 might be constituted.

Thank you again for providing this opportunity to share our thoughts and suggestions with the commission.

Expedited Review Option

In the discussion about accreditation reform, there seems to be a growing consensus on two points: (1) the costs and time demands of the accreditation process have become excessive and unsustainable for institutions that clearly surpass threshold standards for eligibility for federal programs; and (2) the accreditation process is not being as effective as it should be in identifying and challenging the eligibility of institutions that do not provide meaningful educational experiences for their students.

One way to reduce the costs and demands on well-performing institutions and allow accrediting agencies to devote more time and attention to poor-performing institutions is to introduce an expedited review process for institutions that can meet agreed-upon criteria and to extend the period between accreditation reviews for these institutions from the current 10 years to 15 years, with interim reviews after the 7th year, rather than after the 5th.

Expedited Review

Institutions seeking expedited review would have to complete two steps:

1. Meet the criteria established for expedited approval (see below); and
2. Complete a peer review process focused on areas that the institution and the accrediting agency agree constitute areas for improvement.

Accreditation would be granted based on meeting the criteria established in step 1 and completing the process described in step 2. Completion of the peer review process would be achieved by delivery of the peer review report to the institution and receipt from the institution of an acknowledgement and response. The accrediting agency would constitute the peer review team (with an effort to identify members from institutions that are peers of the institution being reviewed), but beyond providing logistical support the agency would not participate in the review process.

Criteria

There are various ways in which criteria for expedited approval could be established. One approach would be to require that institutions meet the following three standards.

Metrics

Institutions would qualify for expedited approval if they met the following criteria:

- Graduation or completion rates above an agreed-upon threshold over an agreed-upon period of time, perhaps adjusted to reflect the type of institution;
- Job placement rates and graduate school/professional school acceptance rates above agreed-upon thresholds;
- Agreed-upon indicators of financial health and fiscal capacity;
- Student loan default rates below agreed-upon levels;
- Alumni satisfaction data that demonstrate approval levels above agreed-upon thresholds.

Transparency

Institutions qualifying for expedited approval would agree to provide publicly available information on the following topics:

- The nature and requirements of their degree programs;
- Their fees and financial aid programs;

- The demographics of their student populations, including socioeconomic, ethnic, geographical, and racial diversity.

Student Learning

Institutions qualifying for expedited approval would agree to put in place procedures to conduct research on student learning and to draw upon the results of that research in designing their programs of instruction.