

November 22, 2011

National Advisory Committee on Institutional Quality and Integrity
U.S. Department of Education, Office of Postsecondary Education
1990 K Street NW., Room 8060
Washington, DC 20006

Dear Members of the NACIQI,

The Association of Specialized and Professional Accreditors (ASPA) would like to submit commentary on the NACIQI Discussion Draft: Higher Education Accreditation Reauthorization Policy Considerations, October 18, 2011. ASPA provides a collaborative forum and a collective voice for the community of accreditors engaged in quality assurance of specialized and professional higher education programs, schools and in some cases single purpose institutions. We are the largest association of accreditors, with approximately 60 members, 33 of which are recognized by the U.S. Department of Education.

ASPA has found the following principles useful when reviewing policy and legislative proposals regarding institutional and specialized accreditation. We support proposals if they demonstrate:

- Respect for the responsibility, freedom and autonomy of accreditation organizations and educational institutions and programs. ASPA supports the responsible recognition of accrediting organizations in which accreditors maintain operational control of their work.
- Preservation of basic conditions for the integrity of the work of accrediting organizations that value diverse standards and procedures and that encourage strong and direct relationships among accreditors, institutions, and programs.
- Avoidance of the concept of centralized national or federal control of higher education or educational quality through the recognition of accreditation organizations or by any other means.

Although we appreciate that accreditors have been afforded the opportunity to provide information, analyses, and recommendations regarding the issues the NACIQI is discussing, we do have concerns about the report. Several views, perspectives and options are presented, however the overall picture created of accreditation, accreditation policy issues and the operation of accreditation organizations is problematic:

- We take exception to the implication that without federal involvement, accrediting bodies would not be accountable to their institutions and programs, the professions, or the public. This ignores the long successful history of accreditation prior to and since federal involvement. Accreditation came into being and continues because the academic and professional communities have the need to define, assure, demonstrate, and confirm quality in higher education to multiple constituencies.
- Current law continues historic requirements that ensure the independence of institutions and accreditors, especially with respect to academic decision making. The majority of the options

presented would lead to regulations that move closer and closer to federal control in this area. A number of the options presented are not permitted by law, including a recommendation that the federal government stipulate specific metrics of student achievement.

- Reductions in the respective independence and authority of the states and the accreditors and increasing use of the Title IV program as leverage to increase federal control over institutions and programs are not acceptable.

Although the document acknowledges the role of accreditation in ensuring educational quality, many options do not honor the core principles of accreditation including the value and importance of peer review. There appears to have been scant attention to the realities of accreditation system operations, the similarities and differences between institutional and programmatic accreditation, the difference between accreditation of programs and single purpose institutions in a specific field or profession, and the operational requirements for preserving the diversity and creativity of educational programs in the United States. The complexity of higher education is produced in part by its diversity; the relationship of this complexity to accreditation standards and practices in multiple agencies and in the accreditation system as a whole warrants consideration. Effective reviews of diverse and complex situations and content require reliance on professional judgment by knowledgeable peers.

ASPA looks forward to participating in the legislative process that develops higher education legislation as it has always done in the past. Our members remain committed to the highest quality of education in our various disciplines and professions.

We hope that the NACIQI will be mindful of the concerns expressed in this letter. We would be pleased to provide clarification or further information whenever requested to do so.

Sincerely,

Joseph Vibert
Executive Director, ASPA