

Dear Members of NACIQI:

I write to respond to your draft report to Secretary Duncan. Thank you for undertaking this important and challenging work. I currently serve as President of Fairfield University and have served as a trustee at Boston College, Canisius College, Loyola Marymount University, and Xavier University. These affiliations, along with my service on the Commission on Institutions of Higher Education in New England, inform my response.

First, I commend the Committee for taking on a difficult and perhaps thankless task. You have been given a short timeline, few resources, and the challenge of addressing long-standing questions about (regional) accreditation.

My principal concern with the Committee's draft report is with Option B "separation of accreditation from the federal aid eligibility process" and Option C "modification of the linkage between accreditation and institutional eligibility." These options would eliminate or reduce the role of accrediting organizations as 'reliable authorities' on the quality of education, leaving only financial indicators, perhaps with federally defined "performance indicators" to assess educational suitability to participate in federal financial aid. My concerns are the following:

- The large amount of federal financial aid available to students through institutions requires a federal interest in assuring that students are attending institutions that provide a satisfactory level of education. Simply at a financial level, students need an education of sufficient quality to be able to earn enough to pay back their loans. Also, because the country needs an educated citizenry, the judgment about participation in Title IV funding should not be based solely on the financial condition of the institution.
- Financial metrics, no matter how sophisticated, are not satisfactory proxies for the quality of education in determining institutional eligibility to participate in federal financial aid.
- No simple inspection system can determine educational quality at the higher education level. To be successful, a system needs the cooperation, interest, and involvement of academics and institutional leaders, and that requires a system of peer review.
- Option C proposes a financial review and a system to determine if institutions meet federally defined "performance measures." Such a system would inevitably lead to the federalization of higher education, threatening the diversity of American higher education and institutional autonomy.

Your report puts forth a vast array of options to be pursued. Some, in my opinion, clearly deserve continued attention (e.g., a comprehensive study of the costs of accreditation). Others appear to be staking out hopes for the future (e.g., more commonly defined data points, keeping the interpretation with accreditation rather than the federal government). And still others represent oft-repeated suggestions that may appear reasonable but have high hidden costs (e.g., making accreditation reports public).

Again, thank you for undertaking this important and challenging work.

Sincerely,

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