

————— Council Of —————
Regional Accrediting Commissions

Middle States Commission
on Higher Education
MSCHE

The Commission on
Institutions of Higher
Education, New England
Association of Schools
and Colleges
NEASC

Higher Learning Commission
of the North Central
Association of Colleges
and Schools
HLCNCA

Northwest Commission
on Colleges and Universities
NWCCU

Southern Association
of Colleges and Schools
Commission on Colleges
SACSCOC

Accrediting Commission
for Community and
Junior Colleges,
Western Association of
Schools and Colleges
ACCJC/WASC

Accrediting Commission
for Senior Colleges and
Universities,
Western Association of
Schools and Colleges
ACSCU/WASC

November 23, 2011

The Honorable Eduardo M. Ochoa
Assistant Secretary for
Postsecondary Education
U.S. Department of Education
Office of Postsecondary Education
1990 K Street, NW, Room 8060
Washington, D.C. 20006

Dear Secretary Ochoa:

On behalf of the Council of Regional Accrediting Commissions (C-RAC), I am pleased to have this opportunity to respond to the options put forth by the National Advisory Committee on Institutional Quality and Integrity (NACIQI) for developing recommendations to the Secretary about addressing accreditation issues as part of the next reauthorization of the Higher Education Act (HEA).

The broad range of ideas expressed in NACIQI's work reflects a thorough analysis of accreditation and its complex role overseeing institutional eligibility for federal student aid programs. The fact that NACIQI's recommendations resulted in such a diverse set of options demonstrates the ongoing difficulty in arriving at a consensus about how best to balance our historic system of voluntary peer review and that of our developing role as federal gatekeepers.

Despite its many challenges, the evolution of accreditation serving as one component of the gatekeeping "Triad" – along with states and the federal government – has been a highly successful endeavor. We do not concur with NACIQI's "Option B" or "Option C" which suggest that accreditation should no longer serve the function of reliable authority on the quality of education. In addition to being highly disruptive in the short term, these options would likely result in an increasing federal role in all aspects of higher education over time. There is clearly a federal role in ensuring taxpayer dollars are well spent; however, it is not in the best interests of institutions, students or taxpayers to have more top-down involvement from the federal government in the day-to-day operations of colleges and universities of all types. The federal government simply does not have the capacity or expertise to replace regional accreditation.

While there is room for improvement in today's accreditation system – as detailed below – the benefits of the overall current structure are plentiful. Institutions benefit from a more robust process of quality review that reflects their unique nature and mission while driving continuous improvement in meeting the changing needs of their student body. This benefits students and ensures that institutions are held accountable for meeting high accreditation standards.

Accreditors provide a highly cost-effective means for ensuring each institution is being regularly monitored and evaluated. Accreditors leverage enormous resources by virtue of the tens of thousands of volunteer hours provided each year from trained peer-review experts who help safeguard taxpayer dollars and ensure academic quality.

When necessary, accreditors make tough decisions and deny or terminate accreditation, leading to institutions' inability to participate in federal student aid programs and thus protecting the interest of students and the federal government. In fact, accreditors set a high bar that institutions must first meet in order to even begin the process of participating in these programs. This process weeds out institutions unable to demonstrate the capacity or resources to meet accreditation standards.

Regional Accreditors recognize the system can be further strengthened, however, and there remain challenges that should be addressed. The system of higher education that existed when regional accreditation was formed has changed immensely. In recent years there has been unprecedented growth in the delivery of higher education through online courses, the for-profit sector has grown in ways that could never have been foreseen, transparency has increased to the point that there is more information to compare and measure institutions than has ever existed, and both the public and policy makers expect that institutions will be held to higher standards – especially with respect to retention and graduation rates and student learning outcomes.

To this end, accreditors have responded to changing institutional, regional, and national needs. Earlier this year, C-RAC welcomed the opportunity to provide testimony before NACIQI in which we discussed our efforts to further strengthen accreditation – from the perspective of institutions as well as of students. Some of these efforts within our regions include:

- Expanding mechanisms for increased public disclosure in the accreditation process;
- Tightening performance standards – particularly for institutions in the for-profit sector;
- Increasing focus on college completion and retention;
- Strengthening oversight of vulnerable institutions and decreasing burden for stable institutions;
- Improving training for peer reviewers;
- Ensuring greater sophistication in reviewing student learning outcomes; and
- Strengthening mechanisms to review the sale or change of control of an institution and monitoring the institution post-change.

Mr. Eduardo M. Ochoa
November 22, 2011
Page 3

However, we acknowledge more can and should be done. For this reason, C-RAC believes that several of the options put forth by NACIQI could well advance the quality and utility of accreditation.

For example, we support options calling for greater adaptiveness and flexibility in the application of accrediting standards based on an institutional risk assessment. This would enable the process to be more cost-effective for many institutions that have had no history of being out of compliance, and focus accreditation on the most critical institutions or issues within established institutions, thereby having far greater impact.

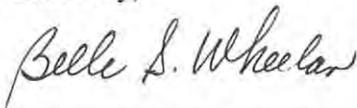
We also support suggestions for increased communication among members of the Triad. This would include exploring new ways to develop expedited reviews of institutions, developing a set of consistent definitions and appropriate metrics for use in the accreditation process, and revising existing statutes and regulations to make accreditation more responsive to institutional circumstances and immune from unjustified legal challenge.

While the above options merit further discussion and strong consideration, there are several recommendations we believe warrant caution, because the costs or consequences have not been clearly identified, nor the possible gains clearly articulated. For example, the recommendation to remove financial issues from the accreditation process seems particularly unwise. Standards in this area have long been a component of accreditation because fiscal problems can create or contribute to problems with academic quality and institutional integrity.

We look forward to participating in NACIQI's upcoming meeting in which we hope to have the opportunity to discuss these issues and in some cases gain a better understanding of the details of individual options. Such information will also allow us to provide a more definitive response to many of the options put forth by the Committee.

Again, thank you for this opportunity to respond, and please know that C-RAC stands ready to continue a dialogue on this very important topic.

Sincerely,



Belle S. Wheelan, Ph.D.
Chair

BSW:rb

cc: Regional Executives