

Dear Sir:

I appreciate the opportunity to comment on the NACIQI Discussion Draft . I strongly believe that accreditation needs to continue to provide the assurance of educational quality necessary to determine institutional eligibility for title iv funds. Accreditation, particularly at the regional level, provides the Department of Education with exactly the tool needed to differentiate between those institutions who can be trusted to administer federal financial aid appropriately and those that cannot. The very small number of cases that make national headlines regarding abuses of the title iv system reflect the increasing demands on accreditors to deal with a broad array of institutions - not fundamental flaws in the accreditation process itself - which grows stronger each and every year.

Of the options provided in the discussion draft, option B would be the most damaging to our higher education system - creating a classic big government solution when no such solution is needed. Oversight by government agencies, who must by necessity develop a whole new body of statutory and regulatory criteria for each of the sectors of higher education, would doom our higher education system to the same fate as that seen in other countries. Our system remains the standard for all other countries - in large part because we have avoided such intrusive government efforts. I can see no way that the Department of Education could administer such a program and no rationale for moving in this direction.

The one area of the draft that has potential in my opinion, is option 18 - to reconsider the various data reports required of institutions. These reporting requirements are right now, onerous and expensive. Reports by different agencies are required in different formats, and use data elements that don't seem to clearly measure any particular institutional quality.

The two metrics that the federal government has helped define - retention and graduation rates - are defined in ways that provide useful data only for a certain type of institution. So, a good faith effort to work with the institutional research community to simplify what is reported and ensure it is useful to accreditors would be a good project for the DOE to pursue.

Thank you for allowing us to make comment.

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