

April 24, 2015

The Honorable Lamar Alexander  
Chairman  
Senate Committee on Health, Education, Labor and Pensions  
SD-430 Dirksen Senate Office Building  
Washington, DC 20510

RE: “Higher Education Accreditation Concepts and Proposals”

Dear Chairman Alexander:

The American Association of Community colleges (AACC) and the Association of Community College Trustees (ACCT) are pleased to offer our comments on the above-referenced white paper. We believe that accreditation continues to play a valuable role in institutional improvement and quality assurance, and that it is neither obsolete nor ineffective. However, accreditors must ensure that they remain effective and relevant in a rapidly changing higher education landscape. The HEA reauthorization can help accreditors do this, if balanced and careful decisions are made that allow accreditation to do what it does best while ensuring that the government’s needs and are met as well.

In December 2013, Daniel Phelan, president of Jackson College in Michigan, testified before the U.S. Senate Health, Education, Labor and Pensions (HELP) Committee on the topic of accreditation, on his and AACC’s behalf. In starting his comments, Dr. Phelan stated:

This great success [of American higher education] is due in part to the system of voluntary accreditation, which predates the Higher Education Act by more than a hundred years. Accreditation has enabled institutions to gauge how they are performing institutionally and relative to their peers, helping them to benefit from their experience, knowledge, and objectivity, which they offer, in turn, to other institutions through the peer review process. It serves as the ‘gold standard’ by which institutions are evaluated, giving assurances to parents and students themselves regarding quality, governance, instruction, fiscal soundness, student success, and the like. It gives assurance to peer institutions that credit hours earned merit acceptance at transfer institutions, and it permits students to receive federal financial aid.

Accreditation remains an essential part of the “triad” governing institutional participation in Title IV that includes state authorization and federal approval of administrative and financial capability.

Accreditation entails a tremendous use of effort and resources, and we agree with the concept paper that accreditation warrants improvement. As Dr. Phelan noted:

campus officials, faculty, and others in the campus community take accreditation extremely seriously and are deeply invested in the process, a reality that seems to have gotten lost in the current policy debates.... I personally view this use of staff and financial resources as a sound investment keeping Jackson College focused on the value-added nature of our work, and its continuous improvement.

Dr. Phelan's views are echoed by the overwhelming majority of college and university presidents surveyed for a 2006 report by the Council of Higher Education Accreditation (CHEA). In that report, presidents stated strong support for accreditation, though the support was not unanimous. (This is the same document that is cited in the white paper in which some college leaders were reported to have said that accreditation was "a costly, burdensome and sometimes overly-bureaucratic endeavor with little or marginal benefits provided to the institution or program.") Similar positive views of accreditation were held by approximately two-thirds of community college presidents in a survey conducted by *Inside Higher Education* in 2012. They agreed or strongly agreed with the statement: "Regional accreditation makes a significant contribution to the quality of our academic programs."

That said, accreditation alone cannot, and is not designed to, ensure that all higher education institutions will consistently live up to some universal standard of excellence. Higher education is extraordinarily complex, heterogeneous, and dynamic; institutions face constant challenges in meeting the needs of students and the manifold expectations of the public and policymakers. For example, community colleges may contend with a lack of resources, conflicting or unhelpful state policies, and an absence of college readiness. By itself, accreditation cannot counter these and many other forces, and it is not the solution for all that may be said to "ail" higher education. However, it can and does ensure a basic level of quality and plays an ongoing role in institutional improvement and self-assessment.

Two prominent criticisms that are commonly levied against accreditors are that they are not sufficiently focused on student learning and that they inhibit innovation. As for the first concern, all the regional accrediting agencies now require institutions to have defined learning outcomes, and these are strongly emphasized in campus reviews. This development represents a true transformation in both accreditation process, and, along with it, higher education. This transformation will continue as learning outcomes measures are further refined.

It is also argued that accreditation inhibits change. However, community colleges are constantly innovating. To cite but a few examples of relatively new practices at our institutions: the widespread advent of distance education, which has been adopted practically by every community college; the growing use of competency-based education and prior learning assessment; the incorporation of industry standards and certifications into curricula and in economic development; the ongoing transformation of developmental education and the related use of co-requisite programs; the extensive establishment of dual enrollment programs; the proliferation of career pathways programs and the awarding of new forms of short-term certificates; and the establishment of reverse transfer agreements. These are some but by no means all of the profound changes that have been undertaken by our colleges—all with the approval of accreditors.

As stated, however, accreditation is not perfect and changes are desirable. We support several changes as outlined below. But we believe that accreditation is still fundamentally sound and

remains important for its designated purposes. Our more specific comments on the white paper follow.

### **Refocus Accreditation on Quality**

#### *Proposal 1: Repeal Accreditation-Related Regulations and Statutes that are Unrelated to Direct Institutional Quality and Improvement*

AACC and ACCT strongly support the white paper's concept of removing requirements placed on accreditors that deter them from their core focus on educational quality. AACC participated in formulating the recommendations of the Task Force on Federal Regulation of Higher Education spearheaded by Sen. Alexander. The report notes that the Department of Education (ED), through the NACIQI approval process, has required accreditors to review things that are far outside of their central mission and expertise, such as fire safety practices and Title IV compliance. Clearly, the latter responsibility properly rests with ED. The report recommends that these superfluous tasks be lifted from the accreditors.

In narrowing accreditation's scope as it relates to Secretarial recognition, it is important not to go too far. Many factors go into evaluating the educational quality of an institution, including those that some might dismiss as "inputs" rather than "outcomes." As with any organization, resources *do* matter. Accreditors should continue to take a holistic view of the many facets of educational quality, and federal statutes or regulations should not interfere with that approach.

Nor should the HEA or regulations impose a one-size-fits-all approach to evaluating student learning outcomes or "bright lines" such as minimum graduation rates. As noted above, one of the great strengths of accreditation is that it is a review process that takes into account the factors specific to each institution such as its mission.

#### *Proposal 2: Permit Flexibility and Nuance in Accreditation Reviews*

AACC and ACCT urge caution in moving towards differentiated or "risk adjusted" reviews. The concept paper states that such differentiated reviews, "if developed thoughtfully, should be equally as reliable and uphold accreditation's serious responsibilities in quality assurance." However, accreditation needs to ensure fairness and a fundamental equality of treatment to all institutions.

We note the interrelation between proposals one and two, as a successful effort to relieve accreditors of the extraneous requirements now placed upon them may, in turn, lessen the demand for expedited review processes because accreditors will be free to focus solely on the core aspects of their missions.

#### *Proposal 3: Encourage Gradation, Distinction and Clarity in Accreditation Status and Reviews*

AACC and ACCT are open to some consideration of the core idea put forward in this section – a transition from "pass/fail" accreditation reviews to a system with different "levels" of accreditation outcomes – but also have some concerns.

First, as the paper notes, "accreditation matters to the public and sends signals of trust and confidence." However, while some components of the public do consider accreditation when

examining their higher education options, it does not necessarily follow that it would value or even notice different levels of accreditation. As we have noted in other contexts, community college students generally choose their institution because it is local and offers what they need.

Furthermore, gradated accreditation outcomes would seem to move accreditors away from their historical mission of quality assurance towards a role where they are essentially rating colleges. Though they are certainly in a better position to do this than the federal government, this would still represent an important shift in the function they currently serve, without sufficient evidence that it will serve institutions or the public better.

As public institutions, community colleges routinely disclose the materials generated during accreditation reviews as a matter of course. Disclosure and transparency of the accreditation process would make the system stronger overall, but it must not come at the cost of institutions refraining from the tough self-scrutiny they typically engage in during accreditation reviews.

#### *Proposal 4: Delink Accreditation from Institutional Eligibility for Federal Student Aid*

Community colleges do not support severing the link between accreditation and Title IV. The marriage between accreditation and Title IV has been bumpy, but it has endured and should in the future. A fact that informs our thinking on this issue is that regional accreditation existed decades before the enactment of the Higher Education Act. This is prima facie evidence of its value to institutions as a means of maintaining quality within and across institutions, and it further implies that the federal government can rely upon it.

If accreditation were to lose its role in determining Title IV eligibility, ED would likely have to greatly expand its gatekeeping role. ED would not be in a strong position to evaluate institutions as the living, breathing and multifaceted entities that they are, nor does it currently have the capacity, expertise, and financial resources to do so. This could result in a much more limited set of metrics by which institutions are evaluated, and would inevitably result in a one-size-fits-all set of standards that the system of regional accreditation is expressly designed to avoid. In addition, because it is the nature of the federal government to be formulaic, ED approval of institutions would almost inevitably bring with it bright-line standards that would not reflect institutional missions and nuances.

There is little evidence that ED would be a more stringent gatekeeper than regional accreditors. As low as the number of institutions that have recently lost regional accreditation may be, far fewer institutions have lost Title IV eligibility due to ED enforcement actions. Additionally, authorizing ED to expand its oversight into areas of student learning and outcomes and other core institutional functions would be an unwarranted federal intrusion into academic concerns that is now expressly forbidden by statute.

#### **Redesign Accreditation to Promote Competition and Innovation**

##### *Proposal 1: Establish New Pathways to Accreditation and/or Title IV Eligibility for Non-College Providers of Higher Education*

The concept paper is right to address the rapidly changing higher education landscape and the opportunities and challenges these changes present. As noted, in our view accreditors have generally done well in adapting to and supporting innovations within traditional institutions of

higher education, including distance education, developmental education redesign, compressed and otherwise modified course offerings, prior learning assessment and competency-based learning. Over the last few years, the conversation has expanded to not only include these intra-institutional changes, but also to address what other entities should be considered Title IV-eligible providers.

Community colleges are open to expanding the scope of organizations eligible to participate in the financial aid programs, but urge Congress to proceed with caution. There are a number of ways that Congress could proceed with this endeavor, and we believe some are more viable than others. Existing accreditors themselves may wind up taking the lead role in evaluating courses and other educational offerings from non-college and university organizations. This would be, to some degree, a natural extension of their mission. The concept paper also floats the idea of establishing a new accreditor, an idea that merits further consideration for the purpose of accrediting innovating programs. Currently, ED has the authority to approve innovative competency-based educational programs for access to Title IV aid, and we have no objections to their continued role in this capacity. ED might be able to play this role in other capacities to approve programs according to criteria developed by Congress, but as described above it is not in any position to replace accreditation. Also worth noting are services already in place that examine non-traditional educational offerings and make college credit recommendations such as that provided by the American Council on Education.

Regardless, the fundamental difference between institutional accreditation and that for individual programs must be kept squarely in focus, and we must not dilute standards in either process. However, overall we believe that examining new pathways to allow innovative programs access to financial aid could be beneficial to our institutions as well.

Whatever one may think of the current state of accreditation, it is a process and infrastructure that has developed over a century, and is not easily replicated or replaced if a new system for evaluating educational offerings from other providers is called for. We have grave concerns with the notion of utilizing states to develop their own accreditation agencies for nontraditional providers. Though now a part of the existing triad, states have shown little inclination historically to utilize their state authorization powers beyond pro forma approvals. Though accreditation itself is regional in nature, the high degree of mutual recognition among these accreditors and the institutions under them equates to credits and credentials that are transferable and portable to a great degree. At least in the near term, this would not likely be the case with a patchwork of up to 50 new accreditors, potentially disserving students who avail themselves of these offerings and use federal funds to pay for them. Finally, we note the potential for state-based accreditors to be overly deferential to offerings from politically powerful businesses and others within any given state.

### *Proposal 2: Eliminate the Geographic-Based Structure of Regional Accrediting Agencies*

The concept paper raises a number of good questions about whether there is still a sufficient basis for the current geographic-based structure of regional accreditation. The idea of accreditation based on institutional classification may have some initial appeal (and already happens to some extent), as the concept of peer review would be even more forceful in such a context. On balance, however, this does not seem to represent an advance for students or institutions.

In our view, having a mix of institutional types participate in the accreditation process provides for a more and not less thoughtful and thorough process. It also reflects the greater “swirling” of students at various institutions; for example, the National Student Clearinghouse recently found that 46% of all baccalaureate awardees had acquired at least some credit at a community college. From a more parochial standpoint, community colleges now benefit from being accredited by the same agencies that accredit the prestigious 4-year institutions in their region, and a “stratified” system of accreditation might take away this distinction. Being accredited by the same agencies also facilitates transfer of credits between community colleges and 4-year institutions, although in many places there is substantial room for improvement.

The current geographical structure of the accreditation system may be due for review by the agencies themselves, but we absolutely do not endorse a solely market-based system for accrediting agencies. The paper asserts that injecting “market forces” into accreditation would result not in a race to the bottom whereby accreditors would lower their standards to attract the most “customers,” but rather a race to the top because institutions would seek to be accredited by the body with the highest standards it believes it can pass, thereby buffeting its reputation. In our view, such a race to the top and a race to the bottom are not mutually exclusive, as different accrediting bodies may take different approaches, perhaps resulting in a greater stratification than envisioned in the paper. However, we remain open to further discussion in this area to support high quality options for our institutions, so long as the basic accreditation structure as envisioned in Title IV remains in place.

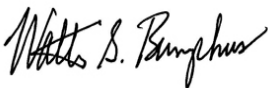
### **Keep Recognition of Accrediting Agencies Independent and Free from Politics**

#### *Proposal: Ensure the NACIQI’s Independence*

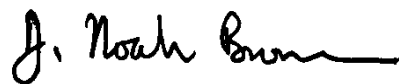
We strongly support the paper’s proposal to “limit any expansion of the Secretary of Education’s authority in making policy-related recognition decisions outside of current law.” Congress must ensure that ED does not overstep its bounds and interfere in academic and other matters that are rightfully the province of institutions and their accreditors. The independence of the nation’s higher education institutions is one of the greatest sources of their strength. However, we do not think it necessary to take the further step of essentially making NACIQI a semi-independent agency.

We thank you for your consideration of these views and look forward to a constructive dialogue in this critical area.

Sincerely,



Walter G. Bumphus  
AACC President and CEO



J. Noah Brown  
ACCT President and CEO