

July 31, 2013

The Honorable John Kline
Chair, U.S. House Committee on Education and the Workforce
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable George Miller
Ranking Member, U.S. House Committee on
Education and the Workforce

The Honorable Virginia Foxx
Chair, U.S. House Subcommittee on Higher
Education and Workforce Training

The Honorable Ruben Hinojosa
Ranking Member, U.S. House Subcommittee on Higher
Education and Workforce Training

Dear Chair Kline, Congressman Miller, Chair Foxx and Congressman Hinojosa:

As the Education and the Workforce Committee prepares for the upcoming reauthorization of the Higher Education Act (HEA), the undersigned organizations write to provide suggestions concerning the Committee's focus on promoting innovation and balancing the need for accountability with the burden of federal requirements. We appreciate this opportunity.

The accreditation community is keenly aware of the challenges to be met in the current climate for higher education. The pivotal role that higher education plays in our society and concerns about price and completion have put a spotlight on greater accountability for academic quality, institutional performance and student success. Accreditation has responded, placing enormous emphasis on student achievement, embracing and encouraging innovation and making huge strides in transparency. Of vital importance to such efforts has been the diversity of higher education offerings nurtured by accreditation and without which the nation's longstanding commitment to access and equity in higher education could not have been honored.

Above all, however, the country has valued accrediting organizations for meeting their public responsibilities for assuring educational quality. It is through this lens that accreditors view the challenges mentioned above. Key to meeting these public responsibilities are the processes of self-regulation and peer review that have made U.S. teaching, learning and research the envy of other countries. The accreditation community is committed to sustaining and enhancing the enormous strength and effectiveness of U.S. higher education. The community has, for decades, displayed its capacity to assure and improve quality while remaining responsive to the many demands of a changing society. Nonetheless, we enter this reauthorization with our historic effectiveness in doubt, despite the significant evidence to the contrary. The accreditation-federal government relationship that was once characterized by deference to academic expertise in judging academic performance and public confidence in self-regulation and peer review is no more. Ignoring this effectiveness, government is now playing a more decisive role in making judgments and setting expectations of academic quality than at any time in the past.

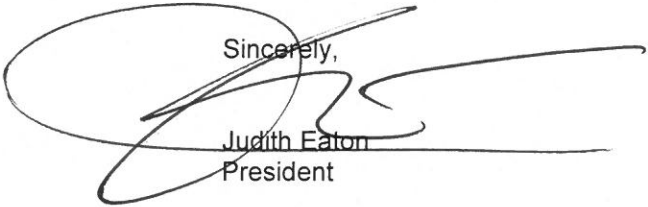
Reauthorization of HEA is an opportunity to redirect the path on which we find the accreditation-federal government relationship such that the academic leadership of our institutions, affirmed through accreditation, works to meet our many challenges. We do not need further government penetration of the arena of academic activity that has traditionally been the province of peer-based review and academic faculty. Quality is not defined as compliance with federal law and regulation. Quality is about the educational experience available to students who seek learning and opportunity. The greatly expanded federal role in accreditation and current focus on regulatory compliance is not, we believe, what Congress envisioned in passing the Higher Education Opportunity Act in 2008, nor does it support the goals of Congress for increasing innovation and reducing the burden of regulations.

We see two major tasks in this reauthorization. First, we need to restate and reframe the division of responsibilities between government and accreditation. Second, we need to streamline the federal recognition review of accrediting organizations, enabling accreditation to spend less time on regulatory compliance and more time on fostering academic quality.

Rethinking the distribution of responsibilities between accreditation and the U.S. Department of Education means asking "What tasks are appropriately assigned to the federal government and what tasks are appropriately the province of accrediting organizations?" Accreditors cannot function as a compliance police for colleges and universities, called upon to enforce federal rules as a primary function. This is the emerging task that is driving the current prescriptiveness and granularity of federal oversight. "Streamlining" means that we work together to diminish the extent and detail of federal oversight of accreditation. Regulatory oversight as an end in itself does not enhance quality or improve the effectiveness of accrediting organizations. Accreditation, again, has public responsibilities and must be accountable. However, we need to think together about effective, efficient oversight – oversight not judged by the numbers of standards and the numbers of regulations.

Accreditation makes an enormous contribution to our society. This reauthorization will be pivotal to protecting that contribution going forward. Are we to continue to erode the value of accreditation through a greatly expanded regulatory regime? Or, will we combine thoughtful consideration of accountability, completion and innovation using the tools of accreditation that have proved so beneficial in the past combined with a regulatory framework that values evidence of effectiveness – not numbers of regulations - above all? The alternative is a reauthorization that undermines the valuable contributions of accreditation in favor of a form of regulatory compliance that is antithetical to accreditation that we know, through years of effective work, provides the greatest benefit to students and the greatest opportunity to build the future.

Thank you for this opportunity to provide our comments to the Committee. We look forward to working with you as reauthorization of the HEA progresses.

Sincerely,

Judith Eaton
President

On behalf of:

Associations

Association of Specialized and Professional Accreditors
Council for Higher Education Accreditation

Accreditation Organizations

Accreditation Commission for Audiology Education
Accreditation Commission for Education in Nursing
Accreditation Council for Pharmacy Education
Accreditation Review Commission on Education for the Physician Assistant
Accrediting Council for Independent Colleges and Schools

Accrediting Council on Education in Journalism and Mass Communications
American Occupational Therapy Association: Accreditation Council for Occupational Therapy Education
Association of Advanced Rabbinical and Talmudic Schools
Association to Advance Collegiate Schools of Business International
Aviation Accreditation Board International
Commission on Accreditation for Health Informatics and Information Management Education
Commission on Accreditation for Marriage and Family Therapy Education
Commission on Accreditation for Respiratory Care
Commission on Accreditation of Healthcare Management Education
Commission on Accreditation in Physical Therapy/American Physical Therapy Association
Commission on Accreditation of Allied Health Education Programs
Commission on Accrediting of the Association of Theological Schools in the United States and Canada
Commission on English Language Program Accreditation
Council for Accreditation of Counseling and Related Educational Programs
Council for Interior Design Accreditation
Council on Academic Accreditation in Audiology and Speech-Language Pathology
Council on Chiropractic Education
Council on Rehabilitation Education
Council on Social Work Education
Distance Education Training Council
Higher Learning Commission of the North Central Association
International Assembly for Collegiate Business Education
Joint Review Committee on Education in Radiologic Technology
Joint Review Committee on Educational Programs in Nuclear Medicine Technology
Middle States Commission on Higher Education
Montessori Accreditation Council for Teacher Education
National Accrediting Agency for Clinical Laboratory Sciences
New England Association of Schools and Colleges Commission on Institutions of Higher Education
Southern Association of Colleges and Schools
WASC Senior College and University Commission
Western Association of Schools and Colleges Accrediting Commission for Community and Junior Colleges