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July 31, 2013

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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:

The Council for Higher Education Accreditation (CHEA) appreciates the Education and the Workforce Committee's invitation to share our suggestions as the Committee prepares for the upcoming reauthorization of the Higher Education Act (HEA).

CHEA is a national organization of 3,000 degree-granting colleges and institutions and recognizes 60 institutional and programmatic accrediting organizations. CHEA has as its core purpose the national coordination of accreditation, the longstanding and historically effective means of assuring and improving academic quality in higher education.

Our comments are focused on four of the six issues raised in your letter of April 25, 2013. We view the issues of empowering students; access, affordability and completion; and innovation all as part of the overall accountability obligations of accreditation and will address these topics within that framework. The issue of balance between that accountability and the burden of federal requirements is, in our view, the defining feature of the accreditation-federal government relationship requiring significant attention.

These comments derive from a four-year national dialogue on the role and responsibilities of accreditation that CHEA initiated in 2008, even at this early date beginning to prepare for a future reauthorization. This effort, the "CHEA Initiative," brought together accreditation and academic colleagues, federal and state policy leaders and the public to focus on the future of accreditation. During the years 2008-2012, we held conferences and meetings throughout the country and produced

a series of white papers and reports addressing the role of accreditation in meeting the needs of students and society. Some 2,500 people were involved in 36 meetings, conferences or workshops, with a number of individuals engaging the conversation on more than one occasion.

It was clear from this dialogue that the issues raised in your letter, accountability in accreditation and the accreditation–federal government relationship, are of vital interest to the accreditation community. The accountability commitment was consistently affirmed as a major focus of accreditation’s work. The need to balance that accountability with federal requirements that were not burdensome was frequently addressed, especially in relation to the recent extensive expansion of that regulation.

Accreditation understands the vital importance of accountability and has taken significant steps with regard to, e.g., enhanced transparency and information to students and the public. Accrediting organizations have expanded their expectations of evidence of student achievement, essential to any consideration of completion, in their standards for review of institutions and programs. Innovation – recent attention to the value of online learning, the emergence of private, non-institutional course providers and the renewed interest in competency-based education – are all being addressed by accrediting organization in their reviews of quality.

At the same time, accreditation continues its commitment to peer review as essential to effective quality review and its focus on mission-driven judgments about quality that allow for academic leadership from our institutions first and foremost. Peer review and institutional leadership are the vital features of higher education that have produced the diverse, accessible and high-quality colleges and universities that students enjoy today. Our commitment to these traditional “goods” of accreditation does not work against the more recently strengthened commitment to accountability. Rather, these commitments reinforce each other.

While our national dialogue affirmed the importance of accountability within accreditation, it has been clear, especially during the past several years, that we have a misalignment between the expectations of the Congress and the expectations of the academic community with regard to accountability and accreditation. Many in Congress view accreditation as not appropriately engaged in an accountability agenda. This is, we believe, because accreditation is viewed as primarily a compliance or policing tool that must force performance levels of colleges and universities. Historically, accreditation has not functioned in this way.

Too many people in Washington see accreditation as “broken” and something that must be fixed – by Washington. This is because they are looking for Washington leadership in the form of standardized, one-size-fits-all quality expectations, with Washington directing the day-to-day work of the 85 nongovernmental accrediting bodies and Washington-controlled information about the quality and effectiveness of higher education. These people believe that accreditation is missing the mark. They believe that the only path to “improved” accreditation is government regulation.

We need a reauthorization that diminishes the misalignment, acknowledges the effectiveness of accreditation’s commitment to accountability and commits to work with accreditation to address our mutual accountability needs of the future.

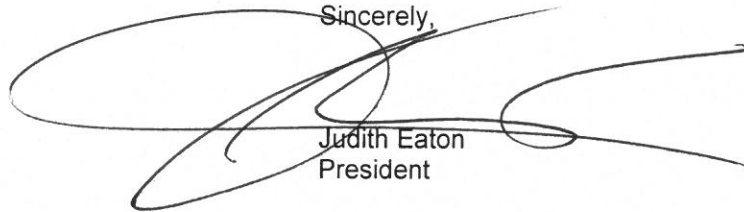
This brings us to the issue of balance or the accreditation-federal government relationship. We need a reauthorization that examines the accreditation-federal government relationship to assure an appropriate division of responsibilities – an academic focus for accreditation and a financial focus for government.

Letter to Kline, Miller, Foxx and Hinojosa  
August 2, 2013  
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We need, above all, a reauthorization that avoids or eliminates regulation that, however inadvertently, undermines the strengths of accreditation and stifles its capacity to be accountable and innovative. Rethinking this relationship accompanied by assuring that regulation of accreditation reflects only what is needed and essential is a proposed action strongly supported by our national dialogue, accompanied by a clear willingness to work with government, but within a clear and reasonable regulatory context.

We thank you for the opportunity to provide our comments to the Committee. CHEA is ready and willing to work with the Committee during reauthorization and will offer recommendations on specific topics as discussions progress.

Sincerely,

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Judith Eaton  
President