

Council for Higher Education Accreditation

One Dupont Circle NW • Suite 510
Washington DC 20036-1135

tel: 202-955-6126
fax: 202-955-6129

e-mail: chea@chea.org
web: www.chea.org

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February 25, 2015

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

The Honorable Virginia Foxx
Chair, U.S. House Subcommittee on Higher Education and Workforce Training
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable Alcee L. Hastings
Member, U.S. House of Representatives
2353 Rayburn House Office Building
Washington, DC 20515

The Honorable Matt Salmon
Member, U.S. House of Representatives
2349 Rayburn House Office Building
Washington, DC 20515

Dear Chair Kline, Chair Foxx, Congressman Hastings and Congressman Salmon:

The Council for Higher Education Accreditation (CHEA) strongly supports H.R. 970, the Supporting Academic Freedom through Regulatory Relief Act. We particularly applaud the bill's intent to repeal regulations related to the definition of credit hour and state authorization and to prevent further action by the U.S. Department of Education (USDE) to establish a college ratings system, the Postsecondary Institution Ratings System.

CHEA has voiced concern about credit hour and state authorization regulations since these rules first were proposed by USDE in 2010. These regulations alter the traditional role of accreditation and its relationship with the federal government and with states.

CHEA has shared its views regarding the problems these regulations pose with USDE and Congress. CHEA strongly supported earlier House legislation (H.R. 2117 and H.R. 2637) to repeal these regulatory provisions and urged our 3,000 member colleges and universities to support these important bills.

The Honorable John Kline, Virginia Foxx, Alcee Hastings and Matt Salmon
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Regulations creating a federal definition for a credit hour move USDE into an area heretofore reserved for academe and accreditation. At their core, credit hour decisions are academic judgments. This is the work of academic faculty and administrators, not the federal government.

State authorization regulations place USDE in a position of authority over decisions concerning which institutions are authorized to operate in various states, upsetting the previous relationship among the federal government, states and accreditation.

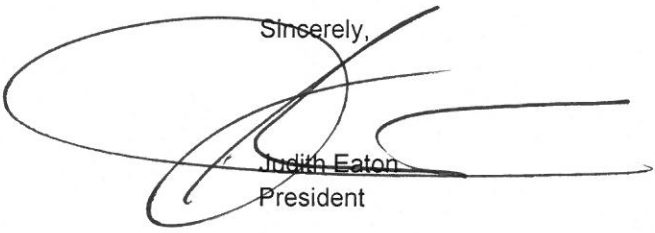
With regard to the college ratings system, the framework released by USDE has resulted in confusion and concern for the higher education community. In particular, we are concerned about its impact on accreditation.

USDE has said that a purpose of the college ratings system is to "help inform" accreditation. It is not clear what this means. Does USDE intend to augment or perhaps even replace accreditation with ratings in some circumstances? Will the ratings of institutions become a factor in the federal recognition review of accreditors? Does USDE envision playing a central role in learning outcomes, requiring the federal government to take responsibility for student performance, a job currently undertaken by institutions and accreditors? Would the ratings mean that access and affordability become quality indicators? Will the ratings' set of quantitative indicators replace the in-depth, peer-based, periodic review of colleges and universities by academics and the public that is provided through the accreditation process? As a country, do we want to move toward a quality assurance model where government, not academics and accreditors, defines and judges quality?

It is our hope that H.R. 970 will be quickly passed by the House and that a companion bill will be introduced and passed by the Senate.

Thank you for introducing this important legislation.

Sincerely,



Judith Eaton
President