

CHEA Response to the National Advisory Committee on Institutional Quality and Integrity Policy Subcommittee Recommendations

The Assistant Secretary for Postsecondary Education Nasser H. Paydar announced that the U.S. Department of Education (USDE) is requesting nominations for an accreditation negotiated rulemaking. There have been recent discussions within NACIQI about processes and policies related to accreditor recognition. The new NACIQI Policy Subcommittee report, although addressing pertinent concerns, raises issues that warrant closer examination.

CHEA outlines below its thoughts on the NACIQI Policy Subcommittee recommendations:

Stakeholder Reach

Noted in this report is the limited reach exhibited by the NACIQI Policy Subcommittee. CHEA notes the lack of or limited engagement with institutions, faculty, students, and states. Because accreditation impacts these stakeholders, their contributions would have provided significant perspectives that would have enhanced the report's recommendations and influenced changes to be considered.

Federal Role in Academic Freedom and Institutional Governance

CHEA fully supports the NACIQI Policy Subcommittee's decision not to move forward on topics related to the federal role on issues involving academic freedom and institutional governance. These are not areas for consideration or involvement by USDE, NACIQI, or its Policy Subcommittee. The academy is capable of managing these processes and has effective policies and practices that serve as guidance and standard operational procedures.

Complaint Process

The Subcommittee's complaint process was addressed in CHEA's first [*Advocacy in Action*](#).

Public Members of Accrediting Commissions

If a public member of an accrediting commission is to be helpful in evaluating institutions, they must have experience in higher education or a special skill, such as law, education, accounting, or industry knowledge, needed by the accreditor. Adding more public members in and of itself is a thoughtful recommendation. However, requiring accrediting commissions to have more of its members be public with no connection to higher education makes the commission less able to evaluate institutions with any degree of nuance or understanding of context of the institution.

Findings from a CHEA 2023 survey to accrediting organizations regarding public members indicate that public members are a vital part of a well-functioning accreditation organization. For institutional and programmatic accreditors alike, the ability to recruit, orient and onboard public members is a challenge that likely will only grow in importance and complexity in the years ahead. In addition, increasing the number of public members to accreditation commissions with less or no connection to higher education will weaken the peer review process. Education stakeholders, especially institutions, would not be served effectively by lessening the higher education experience of public members serving on accreditation commission.

Student Achievement and Outcomes

The responsibility for gauging student outcomes is the onus of institutions and accreditors. These responsibilities must remain in line with the current statutory restrictions imposed on USDE. Imposing student achievement standards by USDE or NACIQI would violate these statutory restrictions. Student achievement measures are indeed important. However, student achievement and outcomes are best managed by institutions, their faculty and staff and validated by their accreditor.

Substantive Change Concerns

One of the concerns the Subcommittee stated around substantive change was the authority for accreditation staff to review and approve certain institutional change requests. This approval is newly implemented and was designed to speed up approval processes so students would benefit from those institutional changes at a faster rate. The concern that facilitated the adjustment allowing staff to approve certain requests was that proposed changes took too long to be approved based on the timing of the accreditor's commission meeting. CHEA supports current regulation which authorizes staff to approve some substantive changes which would help institutions and provide benefits to students.

The NACIQI Policy Subcommittee report enunciates recommendations they believe will assist NACIQI in evaluating accrediting organizations. CHEA encourages USDE to view the Subcommittee recommendations through the lens of what is the greatest benefit to students and the quality of the collegiate experience.

CHEA is a staunch advocate for its member institutions and champions the values of institutional autonomy, academic freedom, mission protection, and peer review. On a national level, CHEA has advocated for these doctrines to solidify the freedom for faculty to teach, students to learn, administrators to lead, and communities to benefit. These principles have long been at the heart of higher education.