The Association of American Universities (AAU) submits the following comments for the February 2011 National Advisory Committee on Institutional Quality and Integrity (NACIQI) Meeting, per the solicitation issued in a December 23rd Federal Register notice.

The AAU appreciates the opportunity to provide initial input to the newly reconstituted NACIQI and its policy subcommittee at the onset of these important discussions on the future of accreditation. We anticipate that there will be additional opportunities to provide input, in advance of the December 2011 deadline for NACIQI to provide recommendations to the Secretary of Education on the 2013 reauthorization of the Higher Education Act. For the purposes of this submission, the association will focus its comments on the importance of upholding basic principles of the accreditation system as changes to the system are considered. The AAU looks forward to a continuing dialogue with this committee and the Department of Education over the coming months on the major challenges with the current accreditation system and potential solutions that balance the need for accountability and transparency to the public with the need for autonomy in the conduct of institutions academic affairs and the importance of academic judgments in the development of accreditation standards and the conduct of accreditation reviews.

The AAU recognizes the importance of NACIQI in advising the Secretary of Education on accreditation-related issues and believes that the renewal of the advisory committee presents the Department of Education and Congress with an opportunity to work with the higher education community to address issues related to the quality and effectiveness of accrediting organizations and “what is working (and not working) in the current system of recognition, accreditation, and student aid eligibility,” as stated in the December 23rd Federal Register notice. The system of regional accreditation has played a critical role for more than a century in providing assurances
of threshold levels of academic quality and facilitating quality improvements. However, the nature of accreditation has changed dramatically in recent years at the same time that our system of higher education has become much less local and much more diverse. Given these changes, AAU appreciates this opportunity to work with NAICIQI to review what is working and not working with the current system, with the goal of making changes over the coming years. Indeed, the key strength of accreditation is its reliance on peer review and candid assessments of institutional and program quality by individuals who are engaged in higher education. Our model of assuring institutional quality has made the American system of higher education the most creative and diverse in the world. We hope that the new NAICIQI will seek ways to improve further this model.

The renewal of NACIQI comes at a time when the national discussion and debate on accreditation and accountability continue unabated among policymakers, the academic community, and the public as the primary stakeholders of the higher education system. While both the federal government and the public need a way to assure the quality of an institution as a good value for their financial investment, the academic community also has a stake in accreditation as a means of strategic planning and program improvement.

Discussions over recent years reflect growing pressure from the federal government to increase accountability broadly, with increased expectations that accrediting agencies will provide that accountability through new and expanded accreditation demands. The debate today is driven in significant measure by the current national campaign to increase the proportion of Americans with a college degree, and hold those institutions that receive federal financial aid accountable for what their students learn. We recognize that all sectors of higher education will have to work together to advance the nation’s shared goal to improve education attainment and the documentation of that attainment.

As the Committee and Department consider options for reforming the current accreditation system in ways that balance our collective interest in maintaining or improving the quality of a degree while also increasing the proportion of Americans with a college degree, it is important to note that the current accreditation system is grounded in basic principles that continue to be important for our higher education system.
Principles

- The accreditation system is a largely non-governmental process of peer review, controlled and managed by institutions of higher education. While the link between accreditation and federal student aid funds necessarily draws the federal government into the accreditation process and has the effect of giving government a role in determining some accreditation standards, the institutions themselves must be able to manage their academic programs and preserve the autonomy necessary for educational excellence, unless the institution has not met basic threshold recognition standards.

- The accreditation process serves as a basic quality assurance to students and their families, the broader public, and the government. It is a way for institutions to improve their quality, document their performance, and to inform potential students and funding sources about their ability to meet their institutional missions. For some institutions, accreditation focuses primarily on whether threshold standards are being met, while for other institutions the focus is on continuous improvement, often concentrating on specific aspects of their programs. With such a diverse higher education system, it is becoming increasingly difficult to differentiate between the role of accreditation in assuring basic compliance for the purposes of federal student aid eligibility and effectively facilitating quality improvements for increasingly diverse higher education institutions. But it is clear that applying a one-size-fits-all set of standards and review procedures regardless of type, size, and mission of an institution is not an effective model for accreditation.

- The federal government (per a rule of construction in the Higher Education Opportunity Act) is prohibited from regulating on student achievement standards. This rule should be restated and reinforced in any discussions, regulations or legislation moving forward. While the federal government has a clear role in ensuring that federal student aid is used appropriately, it does not have role in academic matters, particularly in setting academic standards. Moreover, it should be clarified that the language in the HEOA requiring accreditors to have standards that assess "success with respect to student achievement in relation to the institution’s mission" not be interpreted as a mandate for institutions to adopt quantitative, value-added general assessments of student achievement. Instead, this language should be understood as a directive for institutions to develop meaningful
assessment tools that evaluate student achievement according to their own mission and student body. It is difficult and often not useful for an individual institution to define a single set of student outcomes that works for each program within the institution, much less across other institutions in different sectors of higher education. Many within the higher education, including AAU, are open to the idea of looking at a range of measures to gauge student achievement.

- In this age of accountability, the accreditation process must meet the increased demands for clear, detailed information about the institution and student outcomes without compromising or undermining the enormous institutional diversity that is a central feature of American higher education.

- The self-study process, resulting in a report submitted to the accrediting organization and reviewed by peer reviewers, is a critical component in determining the relative effectiveness of the accreditation process. This process must rely on a site visit team made of the necessary balance of faculty and administrators from comparable peer institutions. Regional accreditors should work with respective institutions to maintain the appropriate composition of site visit teams.

It will be very important for NACIQI and relevant constituencies within the community to carefully examine these principles moving forward, to avoid drifting into a system in which the cost of data collection and reporting requirements outstrip their benefits, and to avoid having the increased demand for the adoption of metrics that purport to quantify student learning outcomes in ways that may be invalid or inconsistent with institutional missions harm colleges and universities. At a time of growing international competition and constrained financial resources for all institutions — public and private — an institution’s energies and resources should be focused on improving its programs; for AAU institutions this means programs of teaching and research.

Again, AAU appreciates the opportunity to provide initial input and looks forward to ongoing discussions with NACIQI and the Department of Education on the future of accreditation.