The Association of American Universities (AAU) submits the following comments to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) discussion draft, Higher Education Accreditation Reauthorization Policy Considerations, issued on October 18, 2011.

The AAU appreciates the opportunity to provide its third set of comments to the NACIQI as these important discussions about the future of accreditation continue in advance of the 2013 reauthorization of the Higher Education Act. We look forward to a continuing dialogue as the committee prepares its report to Secretary Arne Duncan, as well as in subsequent months leading up to the reauthorization.

The discussion draft contains a number of valid assertions and useful suggestions for change and improvement to the current system of accreditation. At the same time, the draft contains some options that raise concerns. Our comments will focus on options listed under Section II of the draft (in the order that they appear), with the assumption that there is broad support within NACIQI and among external stakeholders for accrediting agencies to continue their gatekeeping role with respect to Title IV eligibility, although perhaps through modified procedures. Thus, we support Option A and do not support Option B at this stage of the national discussion about accreditation. We believe that Option C on pages 4-5 raises promising possibilities, but is as yet insufficiently developed to support a specific position.

Our comments to specific options follow:
• Option 1 on page 5 is a worthy goal to pursue; some form of Option 2 could be an effective mechanism for achieving that goal – a common understanding of triad responsibilities.

• Option 3 proposes that financial issues—compliance, stability, viability, and so forth—be assigned exclusively to the federal level, focusing accreditor activity on program quality improvement and allowing for further specialization. AAU supports this option, if properly designed and implemented, as a way to curb fraud and abuse and crack down on degree mills while still facilitating quality improvements through accreditation’s peer review evaluation process. We favor a system in which the role of the federal government in accreditation is largely limited to the assurance of financial accountability (i.e. “federal review of compliance with baseline federal financial responsibility and performance measures”), reserving a non-governmental assessment of academic programs to accreditors. It will be important for the committee to clarify the role of the federal government and NACIQI in establishing procedures for establishing institutional accountability for the use of federal funds, and in contrast, the role of accreditors in carrying out the necessary judgments about academic quality, a complementary but quite distinct role to that of NACIQI. While we recognize that accreditation is shaped by government influence and policy, it remains a system based largely on a non-governmental process of peer review managed by accrediting agencies, working with institutions of higher education. As such, it most appropriate for accreditors and the institutions they represent to discuss the potential options and solutions addressed in the draft, rather than the federal government.

• We have deep concerns with the first sentence of Option 10, particularly the suggestion that “accreditors [should be] responsible in some tangible fashion for [the] overall performance [‗the universe of institutions/programs they accredit‘].” This sentence should be deleted from all future drafts of this report.

• The introduction to Option 11 on page 8, raises the possibility of a reassessment of the regional structure of the institutional accrediting system, as the diversity of educational activities and missions have expanded within a region, and as educational activity and missions have increasingly spanned regional boundaries. AAU supports such a
reassessment, as we have argued that the system of accreditation should allow for different treatments of institutions with different missions and varying levels of quality—effectively weeding out those that do not meet basic fiscal and operational thresholds and working with others to improve their academic programs. In particular, we support further discussion of Option 11 to align the system more closely with mission or sector; whether this could be accomplished within the current regional structure or would require a new organizational structure is an open question.

- We do not support Option 12 on page 8 to allow institutions to choose their own accreditor.

- Options 13-15 on page 8 proposes a review process based on risks assessment, allowing accreditors more flexibility to design systems for expedited review and more gradations than currently available in their accreditation decisions. We strongly support these options; as stated in our February and June comments, AAU supports a more nuanced approach to re-accreditation review that would effectively respond to external demands for accountability while reducing demands on institutions with longstanding records of demonstrated success. We suggest a rewording of Option 13 to state more clearly what we understand to be the intent of this option: “…such that the greater review effort is directed by accreditors to those institutions that present greater potential cause for concern…”

- Option 16 and 18 on page 9 calls for a comprehensive study of the increasing costs of the accreditation process. AAU supports this option, as informal surveys of our institutions show that reviews over the last decade have become increasingly onerous, time-consuming for senior administrators and staff and expensive, with costs in some cases running to $1 million. AAU believes it very important to avoid drifting into a system in which the costs of data collections and reporting requirements outstrip their benefits.

- The suggestions in Options 18 and 19 to evaluate the costs and benefits of the myriad data collected in the accreditation process, and the sharing of federal data with accreditors, are important projects to pursue. Option 20 addresses the need for common data sets for the federal government to rely on for the purposes of Title IV financial aid eligibility and for regional accreditors to use for institutional academic improvement. As
an aspirational goal, we support Option 20 but caution that developing a set of consistent
definitions and appropriate metrics to be used across the entire accreditation process of
the diverse U.S. higher education system will be exceedingly difficult.

- AAU supports Option 21 on page 10 that clarifies that the option does not include
  specification of student learning outcome measures, nor of uniform thresholds on any
  measure to be applied across all institutions. AAU remains committed to the general
  principle that it should be the regional accreditors who work with institutions to develop
  meaningful assessment tools that evaluate student achievement or success according to
  their own mission and student body, perhaps developing standards that are relevant to
  sectors of institutions, rather than applying such standards across very different
  institutions. Many institutions are open and interested in thinking through a range of new
  measures to gauge student achievement, such as time-to-degree, graduation rates, post-
  graduation outcomes, alumni surveys, among others. At the same time, other institutions
  object to requirements for general, value-added assessment instruments that attempt to
  measure student learning but are of unproven reliability and validity or may not work for
  those institutions. In general, establishing a baseline set of data for all institutions is
  unlikely to be workable or effective, and we should be careful not to make qualitative
  judgments based on quantitative information alone.

- Options 23 and 26 suggest independent audits and mandated definitions of data. These
  suggestions are unacceptable and underscore the great risk, embedded within thoughtful
  proposals to improve the consistency and accuracy of data, of moving inadvertently to an
  intrusive federalization of the accreditation process. These proposals should be dropped
  from any collaborative effort to develop better data.

- Options 27 on page 10 calls for greater transparency by making accreditation reports
  available to the public. AAU does not support the full disclosure of reports because of the
  harmful consequences for candid and productive peer assessments. However, we do
  support a discussion of how, in this age of accountability, the accreditation process might
  better meet the public’s demand for clear, succinct information. We must collectively do
  a better job of achieving transparency in our public communications in ways that
  preserve necessary institutional confidentiality.
• Option 28 on page 10 proposes to advance the public interest by increasing the public membership of regional accreditation boards. We believe this proposal is ill-advised and would not achieve its goal of advancing the public interest. However, AAU encourages the regional accreditors to subscribe to a consultative approach to its operations and the public understanding of them. Accreditors and the institutions they accredit should collectively consider ways to engage the public effectively in their activities.

• Option 29 as written, particularly the suggestion that NACIQI might develop accreditation standards, contradicts some of the earlier thoughtful suggestions for clarifying roles in the triad, including recognition of the necessary non-governmental role in carrying out the academic judgments inherent in the accreditation process. NACIQI might encourage the development of standards to adapt to changing circumstances; it should not develop them.

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