The Association of American Universities (AAU) submits the following comments on the National Advisory Committee on Institutional Quality and Integrity (NACIQI) final discussion draft, Higher Education Accreditation Reauthorization Policy Recommendations.

The AAU appreciates the opportunity to provide its fourth set of comments to NACIQI as these important discussions about the future of accreditation continue, particularly 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. We hope that the Department of Education takes the final report under serious consideration in developing its reauthorization recommendations to the Congress.

The final discussion draft contains a number of recommendations for reform supported by AAU. Our comments will highlight the recommendations that we support.

First, AAU strongly supports the draft report’s recommendation to retain the linkage between accreditation and eligibility for federal funds. The discussion draft correctly notes that although this service was not envisioned in the original formation of non-governmental accrediting agencies, eligibility for federal student aid should be linked to assessments of academic quality, and accreditors are the appropriate agencies to carry out such assessments. The discussion draft captures this critical issue clearly and cogently:

“There is value in sustaining the determination of quality as a non-governmental function. In this, we note that a strength of American higher education has been its freedom from federal...
determination of institutional quality and self-improvement processes. The responsibility for evaluating how well an institution is accomplishing its educational work can and should rest exclusively with the institutions and/or the accrediting bodies.”

AAU supports recommendation 9 to encourage a dialogue within the accreditation community about the structure and organization of the accreditation enterprise. As stated in the report, “The diversity of educational activity and mission today may call for a system of accreditation that is aligned more closely with mission or sector or other educationally relevant variable, than with geography. This dialogue may also afford institutions greater opportunity to choose among accreditors.” We believe that the system of accreditation should provide differential treatment of institutions based on differing missions and varying levels of quality and stability. Accreditation should not be granted to those institutions that do not meet basic fiscal and operational thresholds; institutions that surpass those thresholds should be assessed in the context of their missions.

AAU supports recommendations 10 and 11 to encourage accreditors to differentiate the levels and durations of institutional reviews based on varying degrees of demonstrable quality and stability, and encourage accreditors to design systems for expedited review of institutions with longstanding records of strong performance.

AAU supports recommendation 13 to conduct a more comprehensive cost-benefit analysis of the current accreditation process to make existing statutory and regulatory provisions, where possible, less intrusive, prescriptive, costly, and granular, while maintaining the essential quality controls of gatekeeping. Informal surveys of AAU institutions show that reviews over the last decade have become increasingly intrusive and time-consuming. AAU believes that it is very important to avoid drifting into a system in which the cost of data collection and reporting requirements outstrip their benefits.

Related to recommendation 13, AAU supports the general intent of recommendations 14 through 18 to reconsider data that are collected by all accreditation, state, and federal agencies. In this reconsideration, the costs of data collection should be evaluated relative to its utility and
appropriate use. We support the language in recommendation 17 encouraging the development of data on reliable, valid outcome measures such as completion/graduate rates, while avoiding specification of student learning outcome measures or the application of uniform thresholds applied across all institutions. Regional accreditors should work with institutions to develop meaningful assessment tools that evaluate student achievement or success according to their own mission and student body.

As part of the consideration of data in the accreditation process, AAU supports recommendation 19 and 20 to consider new or improved systems of data collections that maintain data integrity and protect individual anonymity, as well as to examine ways to make the Integrated Postsecondary Education Data System (IPEDS) more accurate, timely, and useful.

Lastly, while the final draft recommends that the federal role in accreditation focus on the evaluation of financial stability/compliance data and quality considerations, we look forward to future discussions with the Department of Education about the definition of, and responsibility for, assessing academic quality. AAU recommends that the federal role in accreditation focus on financial integrity and stability and on regulatory compliance, while accreditors focus on the non-governmental role of evaluating academic programs and facilitating program quality improvement through accreditation’s peer review evaluation process. In their respective roles, the federal government and accreditors can effectively complement each other in curbing fraud and abuse and cracking down on degree mills, an issue that the Department of Education and broader academic community will have to address in coming months.

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.