



# ASSOCIATION OF AMERICAN UNIVERSITIES

February 26, 2015

Carol Griffiths  
Executive Director  
NACIQI  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Dear Director Griffiths:

The Association of American Universities (AAU), an organization of 60 leading public and private research universities in the United States, appreciates the opportunity to provide comments on the draft January 2015 NACIQI report that makes policy recommendations on accreditation reform in the context of the reauthorization of the Higher Education Act (HEA). AAU has been actively involved in NACIQI deliberations since 2011. We have provided four sets of written comments<sup>1</sup> and oral testimony on ideas for accreditation reform. AAU believes that the accreditation process performs an integral and critical role in U.S. higher education. Though it is not perfect, accreditation can be a valuable process by which the quality of higher education is, and should continue to be, evaluated. With this letter, we reaffirm our continued support for a non-federal process for determining quality, one that allows for flexibility, cost-efficiency, and informed academic judgment.

Our comments focus on select recommendations in the draft NACIQI report.

**Recommendation 4 - to direct NACIQI to identify the essential core elements and areas of the recognition review process, focusing on student learning and student outcomes.**

We support a system in which all institutions, working with their institutional accreditors, are expected to provide evidence of student success. The demonstration of quality is a fundamental responsibility, but the kinds of quality and the methods used to measure it will differ depending on the mission of the institution. While all institutions should be expected to provide evidence of success, we do not support the Department or accreditors mandating specified quantitative general assessment measures as part any focus on “student learning and student outcomes.”

AAU helped to lead an effort of the six presidential higher education associations and seven regional accreditors in July 2013 that culminated in a consensus statement *[Principles for Effective Assessment of Student Achievement](#)*. These principles state that while the exact criteria for assessing student achievement and the methods for

<sup>1</sup> [Comments submitted May 22, 2014](#); [Comments submitted March 26, 2012](#); [Comments submitted November 28, 2011](#); [Additional comments presented June 9, 2011](#); [Comments Submitted January 31, 2011](#).

Boston University  
Brandeis University  
Brown University  
California Institute of Technology  
Carnegie Mellon University  
Case Western Reserve University  
Columbia University  
Cornell University  
Duke University  
Emory University  
Georgia Institute of Technology  
Harvard University  
Indiana University  
Iowa State University  
The Johns Hopkins University  
Massachusetts Institute of Technology  
McGill University  
Michigan State University  
New York University  
Northwestern University  
The Ohio State University  
The Pennsylvania State University  
Princeton University  
Purdue University  
Rice University  
Rutgers, The State University  
of New Jersey  
Stanford University  
Stony Brook University –  
State University of New York  
Texas A&M University  
Tulane University  
University at Buffalo –  
State University of New York  
The University of Arizona  
University of California, Berkeley  
University of California, Davis  
University of California, Irvine  
University of California, Los Angeles  
University of California, San Diego  
University of California, Santa  
Barbara  
The University of Chicago  
University of Colorado, Boulder  
University of Florida  
University of Illinois, Urbana-  
Champaign  
The University of Iowa  
The University of Kansas  
University of Maryland, College Park  
University of Michigan  
University of Minnesota, Twin Cities  
University of Missouri, Columbia  
The University of North Carolina at  
Chapel Hill  
University of Oregon  
University of Pennsylvania  
University of Pittsburgh  
University of Rochester  
University of Southern California  
The University of Texas at Austin  
University of Toronto  
University of Virginia  
University of Washington  
University of Wisconsin - Madison  
Vanderbilt University  
Washington University in St. Louis  
Yale University

measuring them will differ, all institutions should be expected to provide evidence of success in three areas:

1. evidence of student learning experience (institutions should be able to describe the kinds of experiences students have inside and outside the classroom),
2. evaluation of student academic performance by measures determined by the institution, and
3. post-graduation outcomes (e.g. completion, job placement, post-graduate study, civic participation, etc.).

Importantly, institutions should be able to determine which instrument it uses to measure progress in these areas. We believe that measures of all kinds work best if they are integrated into the teaching and administration of colleges, closely linked to the curriculum students are learning, and analyzed on a regular basis.

We believe the current statute prohibiting the federal government from regulating on student achievement standards should remain in place as Congress reauthorizes the HEA. We should also clarify that the current provision requiring accreditors to have standards that assess success with respect to student achievement should not be interpreted as a mandate for institutions to adopt specified quantitative general assessment measures.

**Recommendation 5 - to grant accrediting agencies greater authority to create different substantive tiers of accreditation and to use different processes for different types of institutions, including expedited processes.**

As stated in AAU's HEA reauthorization recommendations of July 2013 – as well as by NACIQI in its report *Higher Education Accreditation Reauthorization Policy Recommendations* and the American Council on Education's report *Assuring Quality in the 21st Century: Self-Regulation in a New Era* – AAU believes strongly that accreditors should develop and implement expedited review procedures for institutions with a record of stability and successful performance. This fits with the emphasis in the bill on risk-based assessment. We strongly support this recommendation.

As outlined in the *Report of the Task Force on Federal Regulation of Higher Education*, issued by a Senate-appointed Task Force chaired by Chancellors William E. Kirwan and Nicholas S. Zeppos, the capacity of accreditors to conduct “differentiated reviews” needs to be clarified. There is disagreement as to whether accreditors currently under the HEA have the legal authority to allow institutions that have records of exceptional quality and performance to undergo a less arduous set of procedures and processes. Clarification of this capacity would enable accreditors to focus on those institutions that need additional assistance, as well as to minimize the burden on high-performing institutions. We believe that NACIQI should urge Congress to ensure that accreditors not only have the explicit authority to conduct differentiated reviews, but are required to conduct them under specified circumstances.

**Recommendation 6 - to establish that the recognition review process should differentiate among accrediting agencies based on risk or need with some identified as requiring greater levels of attention.**

It is critical that the accreditation system respond differentially to the varying degrees of risk that different institutions present. We strongly support this recommendation. Risk-adjusted scrutiny is a standard and indispensable regulatory practice. For example, when institutions perform biological research, the safety standards appropriate to the different laboratories vary with the kind of research that is conducted there. Both low- and high-risk biological research may be valuable to society. The regulatory variations recognize that safety measures have to be tailored to the kinds of dangers they are likely to represent. A risk-adjusted approach would allow accreditors to focus on institutions that present the greatest potential problems while decreasing burdens and costs for well-performing institutions. Most importantly, such a system would serve the interests of students because the accreditors would be better able to address and ameliorate real risks to educational quality.

**Recommendation 8 - to make accreditation reports about institutions available to the public.**

We agree with the need for transparency in the accreditation process and, as such, support this recommendation, though with important limitations. Providing the public with appropriate kinds of information can help inform their college decision-making process. To this end, many institutions disclose accreditation self-studies, compliance reports, on-site evaluations, and documents related to adverse accreditation actions. However, some accreditation processes also call for the inspection of confidential data, memoranda and documentation that is inappropriate for public disclosure. Such materials should be excluded from any disclosure requirement. Institutions should also be given latitude in determining whether to publicly share certain documents and data that may be cited in their self-study reports, recognizing that this may be necessary to ensure candor in the review process. If this provision is advanced, we propose that institutions be able to submit a request to the Department of Education for maintaining confidentiality with respect to certain information in a self-study. The Department would then make a determination after considering the sensitivity of the information in the request.

**Recommendation 9 - to afford institutions the widest possible array of choice of accreditor for access to Title IV funds.**

Regardless of the choice of accreditor, one of most critical components of the accreditation process is the self-study process. It determines the relative effectiveness of the accreditation process. This process relies on a site visit team composed of faculty and administrators from comparable peer institutions. Peer review works best when the standards being applied are appropriate to the sector and the reviews are conducted by individuals who have deep familiarity with the mission and organizational structure of the institution under review.

**Recommendation 11 - to establish less burdensome access to Title IV funding for high-quality, low-risk institutions.**

While the draft report does not include much detail on this recommendation, AAU supports the recommendation to develop a less burdensome route to Title IV funding

through an expedited recognition process, potentially through a simplified data reporting process.

**Recommendation 12 - to require institutions to provide audited data on key metrics of access, cost, and student success.**

Providing students and families with clear, accurate, and useful information about higher education institutions is an appropriate federal role, given the significant investment the U.S. government makes in student financial aid. We support this recommendation, but only in the context of streamlining existing consumer disclosure tools. There are at least four federal consumer information tools currently available – College Navigator, the White House College Scorecard, the Financial Aid Shopping Sheet, and the College Affordability and Transparency Center. We welcome a discussion with the Administration on how to merge and simplify these tools to best serve students and families, including an analysis of the additional information consumers want and need, the feasibility of obtaining that information, and the most effective ways to disseminate it.

We look forward to a continuing dialogue with the committee and the Department of Education on the major challenges with the current accreditation system. We hope the Department continues to seek input from the higher education community in working towards potential solutions that provide accountability and transparency to the public while respecting the autonomy and academic integrity of individual institutions.