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On behalf of the
National Association of Independent Colleges and Universities**

National Advisory Council on Institutional Quality and Integrity

Panel: Perspectives of Institutions

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What issues are critical to consider in advancing quality assurance in higher education, going forward?

INTRODUCTION

- I appreciate having the opportunity to appear on behalf of the National Association of Independent Colleges and Universities (NAICU) as the NACIQI considers updating its recommendations to the Secretary of Education regarding the accreditation provisions of the Higher Education Act (HEA).
- A strong accreditation system is vitally important to the nearly 1,000 private, non-profit institutions that comprise the NAICU membership.
- We see its effective operation as essential to maintaining both the quality and diversity of American higher education. As such, this is an issue we have followed closely since the founding of NAICU in 1976.

NAICU PERSPECTIVE

- **Accreditation is a dynamic process that works.** NAICU member presidents have discussed accreditation on numerous occasions. No one argues that it is perfect, but the clear message is that it works and that it continues to get better. It operates very much in the academic tradition of no-holds-barred peer review.
- **It works because of its mission-based focus.** The reason that a diverse array of higher educational offerings is available in this country is due to the mission-based focus of accreditation. This diversity permits students to find their “best-fit” institutions and maintains the vitality of our system of higher education. Other means of external review—particularly if conducted by a government entity—cannot match this flexibility.
- **It works BEST when it maintains a focus on quality assurance.** “Mission creep” is becoming a real issue in accreditation. There is a constantly growing list of federal legal requirements that accreditors are expected to see that institutions are meeting.

- Time that should be spent on quality assurance functions is instead being used to check on an institution's compliance with federal Title IV requirements. This is a function more appropriately handled by federal officials.
- One of the more concerning recent examples of this trend was the development in regulation of a federal definition of "credit hour" and the assignment of enforcement responsibility to accreditors. And it is not just a matter of writing these enforcement responsibilities into the regulation—but also the prescriptiveness of those requirements.
- **There is a need to avoid a "check-the-box" focus on compliance.** One of the worst things that could happen to accreditation would be to place it in the constraints of a compliance mentality. Accreditation is not about a granular review of institutional compliance with narrow requirements, and review of accreditors should not be either.
 - All too often, a holistic view of an accreditor's performance seems to get lost in a sea of minor procedural infractions.
 - Reviews seem to be based on the assumption that all accreditors need to score 100% on the exam in order to pass.
 - If there is a provision of statute or regulation that demands this level of compliance, it should be modified.
- **Finally, there continues to be a need to increase public understanding of what accreditation does and how institutions demonstrate their quality.** Accreditation is not well understood by the public or policymakers. It can be difficult to explain, but efforts should continue to find creative ways to do so.
 - Taking steps such as disclosing more accreditation reports is unlikely to do the trick. (As I have discussed with NACIQI before, it is NAICU's view that general disclosures of accreditation reports and the like will substantially change the nature of the process and undermine the frankness and candor that help make it successful.)
 - A more productive approach for addressing questions of consumer information would be to develop a federal consumer information tool that helps make the college selection process more comprehensive and more responsive to the interests and priorities of the individual student and his or her family. Such a resource would: (1) Ask consumers what they want; (2) Be both long and short enough; (3) Include both quantitative and qualitative information; and (4) Utilize some of the volumes of data already being collected by the Department of Education. NAICU's U-CAN, which was developed with input from parent and student focus groups, is one model of such an approach.

CONCLUSION

- In closing, I'd like to thank you again for giving us with the chance to participate in your consideration of these issues.
- I'd also like to express appreciation for the time you have devoted, not just today, to mastering the intricacies of the system and helping to make it work.