



Accreditation Talking Points

- The Department of Education is currently attempting to use a process known as "negotiated rulemaking" to make fundamental changes in the accreditation system. The proposals it has advanced would replace the current peer review model with a top-heavy federal regulatory model – creating a de facto "Ministry of Education." Under this new model, through its process for approving accreditation agencies, the Department would dictate far-reaching new standards and policies that accreditors must apply to institutions. Accreditors would then become the enforcers of these federal policies. The Department's action is unprecedented in its reach.
- Specific concerns about the current rulemaking discussions include proposals calling for:
 - ▶ The establishment of rigid measures of student learning outcomes that meet "external" standards acceptable to the Department of Education. As a practical matter, this requirement will ultimately lead to standardization across institutions. A related proposal calls for accreditors to routinely collect and analyze "key performance indicators" – giving them a new role in the data collection and enforcement business as well.
 - ▶ The establishment of requirements related to an institution's decisions regarding the acceptance of transfer credits. Transfer of credit is not mentioned in the Higher Education Act, so the Department of Education is usurping the role of Congress by regulating in this area. More importantly, the Department is inappropriately interfering in the academic decision-making process, and undermining existing state and institutional policies.
- The Department also proposes to strengthen its own hand by tightening control over the process by which it recognizes accreditation agencies – opening the opportunity to dictate further changes in the future.
- This approach is a grave mistake. The real strengths of accreditation are its reliance on peer review and candid assessments by individuals who are engaged in higher education. This collegial process cannot be sustained in an environment where standardization is sought, and diversity is seen as a weakness rather than as a strength. Our model of assuring institutional quality has made the American system of higher education the most creative and diverse in the world. Centralizing control would lead to the homogenization of American higher education, and the loss of the very qualities that have made our system strong.

- Accountability is important. Institutions recognize the importance of being responsive to their various stakeholders. Contrary to the view that learning outcomes acceptable to the Department of Education are the only means of proving accountability, institutions have been engaged in a variety of ways to demonstrate their value to their students and to society as a whole. Furthermore, the vigorous higher education marketplace supplies an inherent degree of accountability and quality control.
- The ways in which private colleges have demonstrated accountability are as diverse as our sector itself. We have long embraced the notion of "appropriate accountability," which is achieved through the three principles of self-governance, legal and fiscal responsibility, and peer review. The NAICU Web site outlines the variety of ways in which our members demonstrate accountability (www.naicu.edu/special_initiatives/accountability/Institutional_Examples/id.533/default.asp). In addition, in response to calls for greater accountability and transparency, we are in the process of developing a consumer information template containing a clear, concise, and consistent set of data which we will encourage our member to adopt.
- It is especially inappropriate for the Department of Education to rewrite the accreditation regulations at this time. Since the law dealing with accreditation has not been changed since 1998, and since Congress is currently considering changes to that law, the Department should suspend regulatory action on accreditation until Congress has amended the law. As Higher Education Act legislation is considered, Congress should reaffirm the current mission-based, peer review model of accreditation by:
 - ▶ Maintaining the opportunity for frank, candid assessment of institutions;
 - ▶ Rejecting the imposition of rigid measures across institutions; and
 - ▶ Preserving the ability of institutions of higher education to make academic judgments.
- No nation ever improved the quality of its colleges and universities by increasing government control over them. In fact, most countries around the globe are discarding their ministerial, top-down systems for regulating higher education and are adopting the more flexible and dynamic American accrediting agency model. With our ability to compete effectively in the 21st Century at stake, the path the Department has embarked on to broaden its control over academic improvement and quality is a serious step in the wrong direction.