



## Comments on Proposed Revisions CHEA Recognition Standard 12B.5

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### Standard 12B.5:

“12B. . . . To be recognized, the accrediting organization provides evidence that it has implemented:

. . .

5. policies or procedures, as developed by the accreditation organization through appropriate consultation with institutions or programs, to inform the public of decisions on accreditation status **and the reasons for these decisions;**” [New language in bold.]

### Comments:

The proposed revision to the public disclosure standard is essentially the same as language proposed in draft versions of the CHEA recognition standards when they were last revised in 2006. At that time, I expressed concern about the negative impact of broad disclosures of accreditation findings on the nature of the accreditation process generally and on small institutions in particular. I was pleased that the final standard did not include language requiring such disclosures.

The current proposal concerns me today for the same reasons it concerned me in 2006, and for the same reasons it concerned me throughout the lengthy Higher Education Act (HEA) reauthorization process. Then and now, it is NAICU’s position that such a requirement should not be instituted. Our broad concern is that it would weaken accreditation, by undermining the frankness and candor that help make the process successful.

Our very particular concern is the impact on small institutions—many of which are faith-based, and financially lean, but have survived for generations. The NAICU membership includes many of these types of institutions that have shown amazing resiliency in delivering quality education against long odds. Vulnerable institutions are very concerned about the disclosure of negative findings that are part of an overall positive review. Negative publicity can spell life or death for these schools, if a misconstrued article ends up in the local press and even a relatively small number of students decide not to enroll as a result. In most of these cases legitimate problems can be—and historically have been—worked through (i.e. often these institutions are “flagged” over financial issues). The alternative for the accrediting agency is not to be as “tough” on the school in the internal reports—something that is not a good public policy outcome either.

Ultimately, the test of new disclosure requirements should be their usefulness to students and parents. It is unlikely they will seek to read summaries of findings at institutions that do not have significant quality issues. In amending the HEA, Congress did not adopt a requirement that such findings be disclosed. They chose, instead, to limit disclosures of findings to adverse actions, namely: instances involving final denial, withdrawal, suspension, or termination of accreditation. NAICU is on board with this resolution of the issue. Limiting disclosures to those decisions identified as adverse actions by the HEA strikes the appropriate balance. The CHEA recognition standards should do the same.