# ASSURING QUALITY AND ACCOUNTABILITY IN POSTSECONDARY EDUCATION: ASSESSING THE ROLE OF ACCREDITATION

## HEARING

BEFORE THE

SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS

OF THE

COMMITTEE ON EDUCATION AND THE WORKFORCE

HOUSE OF REPRESENTATIVES

ONE HUNDRED SEVENTH CONGRESS

SECOND SESSION

HEARING HELD IN WASHINGTON, DC, OCTOBER 1, 2002

**Serial No. 107-81**

Printed for the use of the Committee on Education and the Workforce

83-028 pdf

For sale by the Superintendent of Documents, U.S. Government Printing Office
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# HEARING ON ASSURING QUALITY AND ACCOUNTABILITY IN POSTSECONDARY EDUCATION: ASSESSING THE ROLE OF ACCREDITATION

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**TUESDAY, OCTOBER 1, 2002**

**SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS,**

**COMMITTEE ON EDUCATION AND THE WORKFORCE,**

**HOUSE OF REPRESENTATIVES,**

**WASHINGTON, D.C.**

The subcommittee met, pursuant to call, at 2:30 p.m., in Room 2175, Rayburn House Office Building, Hon. Howard P. "Buck" McKeon [chairman of the subcommittee] presiding.

Present: Representatives McKeon, Johnson, Ehlers, Goodlatte, Osborne, Tierney, Wu, and Hinojosa.

Also Present: Representative Petri.

Staff Present: George Conant, Professional Staff Member; Patrick Lyden, Professional Staff Member, Deborah L. Samantar, Committee Clerk/Intern Coordinator; Kathleen Smith, Professional Staff Member; Liz Wheel, Legislative Assistant; Brady Newby, Communications Specialist; James Kvaal, Minority Legislative Associate/Education; Joe Novotny, Minority Staff Assistant/Education; and Suzanne Palmer, Minority Legislative Assistant/Education.

**Chairman McKeon**. A quorum being present, the Subcommittee on 21st Century Competitiveness will come to order.

I am sure most of you heard over the weekend that our good colleague, the ranking member of our subcommittee, Mrs. Mink from Hawaii, passed away. I want to send my condolences and my sympathy, to her family and to her constituents of Hawaii and all the people from Hawaii that she served for some years.

I especially will miss her because we have worked together for the last 2 years. You get a kind of a special relationship between the chairman and the ranking member, and we have spent time at breakfast getting to know each other personally as well as the issues on which we have worked together. I will miss her personally in addition to as a colleague and a great member of this body.

I would like to ask Mr. Tierney if he has any comments to make, and then we will join in a moment of silence before we begin the hearing.

**Mr. Tierney**. I thank you, Mr. Chairman, and I appreciate your words, as I know Patsy Mink's family and friends and the staff do also.

We are talking about honoring a woman who served with distinction as the Ranking Democrat on this subcommittee. I offer my condolences, along with the chairman's, to her family, her husband John and her daughter Wendy, especially; also to her staff, who really experienced a tremendous loss. Patsy was a great leader. At 74 years old, she had more energy than the staff and all of her colleagues together, and she really showed it and exhibited it every day.

From the time she was 4 years old, when she insisted by grabbing her older brother's hand and forcing him to take her to his first grade class, until the time when she became the first Asian American woman to practice law in Hawaii, from her first election to Congress as the first woman of color, she broke down barriers for herself first and then for others.

She left a legacy of millions of working families that she helped to lift out of poverty with education and job training programs ranging from the war on poverty to welfare reform, and left a generation of female student athletes for whom she drafted, passed and implemented Title IX, the 30-year anniversary of which we just commemorated this past June.

Patsy provided vision, courage and leadership, spoke out on all the vital issues of the day inspiring us, her colleagues, with her fiery oratory on the House floor and her policy negotiations that combined her mastery of education and labor issues with her powerful persuasion tool of chocolate-covered macadamia nuts. The chairman understands her bribery methods.

Mr. Chairman, I know my colleagues on the committee staff join me in mourning the loss of a valued friend and colleague whose distinguished service to the House and to this committee has made a difference in the lives of millions of Americans, and we will miss her dearly.

**Chairman McKeon**. Thank you, Mr. Tierney.

Now if you would all please join me in a moment of silence for Mrs. Mink.

[Moment of silence.]

## *OPENING STATEMENT OF CHAIRMAN HOWARD P. "BUCK" MCKEON, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.*

Thank you. Good afternoon. I want to welcome all of you here today, especially our witnesses, and thank you for taking the time to be with us.

Next year, as you know, this committee will begin the focus of reauthorizing the Higher Education Act, where our main focus will center on examining Federal policy that provides access to a high quality and affordable college education. In an effort to begin that process, we are holding this and other hearings at the end of this Congress to begin reviewing topics that may be addressed during reauthorization.

Since my time on the committee, I have always believed that there is nothing more important than the education of our citizens, and it is the responsibility of this Congress to afford the opportunity for all Americans to get a quality education. While we cannot control which school a student chooses to attend, we can certainly work to provide some level of confidence that the institution they do attend will live up to its obligation to provide an education that adheres to some kind of standard. Most consumers look to accreditors to provide such confidence.

If the school and its programs are accredited, the assumption by most is that it provides a quality education.

The purpose of this hearing is to determine if that is accurate. Over the last few months there has been a good deal of conversation about quality education and holding institutions accountable for the education that they provide. As a member that is interested in exploring ways to open the doors of opportunity for all Americans through access to a quality postsecondary education, I believe that we should thoroughly examine the accreditation process.

As most know, while there are standards now in the Higher Education Act, there is also a provision that allows for expansion of standards as deemed appropriate by the accrediting agencies. In that vein, I am extremely concerned that accreditation agencies are imposing standards on institutions that have little or nothing to do with academic quality. It is my hope that through this hearing, as well as others held next year, we will address this concern and learn in great detail the answers to the following questions.

Does the fact that an institution gains accreditation mean that it is a quality institution?

Is there more accreditors can do to ensure that the education provided by a postsecondary education is in fact quality?

Should there be more independence within the accreditation process rather than continue what is now more of a peer review process?

Should Congress do more to require specific standards for accreditors and the areas they review?

I am eager to hear from all of you today so that we here on the committee can better understand the accrediting process, how regional and national accreditors interact, as well as their roles and responsibilities. We also need to hear what standards are imposed on institutions and how to make sure students and their families have a clearer understanding of what accreditation means to them as consumers.

Again, I thank you for being here today.

**Mr. Tierney**.

WRITTEN OPENING STATEMENT OF CHAIRMAN HOWARD P. "BUCK" MCKEON, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C. – APPENDIX A

## *OPENING STATEMENT OF REPRESENTATIVE JOHN F. TIERNEY, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.*

**Mr. Tierney**. Thank you, Mr. Chairman. Again, we thank all of the witnesses for being here today and giving their time and expertise.

Let me apologize up front for the fact that I will be bouncing in and out of here because I have another hearing going on upstairs. I will read your testimony; and my staff will be here, and I will be in and out trying to make sure that we learn all that we can learn. You are going to provide, valuable input and information to us as we address this whole idea of accreditation in the context of what we are asking colleges to do and the challenges that our universities are going to meet over the next period of years.

I want to recognize and acknowledge Dr. Charles Cook for coming to testify before the subcommittee today. He is Director of the Commission of Institutions of Higher Education in the New England Association of Schools and Colleges in Bedford, Massachusetts, which I am proud to say makes up a part of my district.

So, Dr. Cook, I want to especially acknowledge you.

Accreditation has played an important role, and it ensures, or should ensure us, that our postsecondary institutions are providing students with a good, positive education, as the chairman

mentioned.

The Department of Education has oversight, as you know, over accreditation. Nongovernmental, private education associations develop criteria and conduct peer evaluations of institutions to determine whether or not standards for accreditation are met. Although the Department publishes a list of nationally recognized accrediting agencies, there is considerable latitude in the accreditation process; and I am sure we are going to cover just what that latitude is and whether or not it ought to remain as is or be changed.

Accreditation also plays a significant role in financial aid, as a substantial financial aid system is limited to institutions that are accredited by agencies recognized by the Department of Education.

As we begin to address the role of accreditation and higher education, much has changed since Congress last reauthorized the Higher Education Act in 1998. I think distance learning will no doubt be one issue that I, for one, would like to talk about. I think other members of this committee would.

We authorized a Web-based education commission in the 1998 reauthorization of the Act. I have some concerns about rushing to new conclusions without first getting the evaluation and the reports of that committee, or commission. I know that some disagree, as they supported H.R. 1992, the Internet Equity and Education Act, last fall. But I think we will have much to examine and discuss, both in that report and in your comments, regarding accreditation and distance learning this year and in the coming congress.

I also have some concerns about the lack of transferability of credits for our students who may begin courses at one college, then continue their education at a 4-year college. And I am interested in knowing how the curriculums of postsecondary institutions will keep pace with the changes in our culture and in our society.

So, overall, we need to carefully consider the accreditation process. It ultimately helps us shape the education and training that our students receive as they enter life and, certainly, the work force. But I never see that as education's primary goal. I think we have got a lot of other things to do with our students in terms of citizenship and our next level of innovators and scientists and other things that we need.

So I want to thank you for coming before the subcommittee today. I will look forward to your testimony and I am sure we will appreciate it. Thank you.

WRITTEN OPENING STATEMENT OF REPRESENTATIVE JOHN F. TIERNEY, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C. – APPENDIX B

**Chairman McKeon**. The senior member of our committee, Mr. Petri from Wisconsin, has been involved in this issue for some time, and I would like to turn now to him for an opening statement.

## *OPENING STATEMENT OF REPRESENTATIVE THOMAS E. PETRI, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.*

**Mr. Petri**. Thank you very much, Mr. Chairman. I first of all want to commend you for having this hearing and the indication that there may be further hearings as you prepare for reauthorization in the next Congress of the Higher Education Act. I have a brief opening statement on the subject, which I think is quite important.

Accreditation is almost never mentioned in today's discussions over the escalating costs of higher education, declining academic standards and accountability. A closer examination of the accreditation system reveals that it does little to address these problems and, in some ways, contributes to them.

The costs of higher education continue to increase faster than inflation and the Federal Government's contribution to student aid increases in tandem. We rely on the accreditation system to ensure that a school provides a quality education and is therefore eligible for these Federal dollars. But what does accreditation really say about a school?

Unfortunately, accreditation, these days, has little to do with academic rigor or educational outcomes. Rather, it serves only to show that a school has the right set of inputs. For example, an accrediting agency may place an emphasis on schools having a certain number of professors with terminal degrees in their field. Yet the question is never asked whether students in classes taught by these professors are actually learning anything.

I would like to point out that this focus on inputs over outcome is exactly the same criticism shaping reforms being discussed for Federal special education policies. Congress has imposed on States mandates that we assume will provide the intended educational outcome, but then we never ask if those outcomes are being achieved. While this focus on inputs fails to guarantee academic quality, it also unnecessarily drives up the cost of higher education.

As part of the accreditation process, schools must pay dues to their accrediting association and conduct extensive self-studies that require a great deal of time and money and produce information of questionable value. Furthermore, accreditors may make recommendations that pressure schools to reallocate scarce resources in a manner that may not suit the overall needs of the school or may not be the most effective use of those resources. Or, even worse, an accreditor may pressure a school to pursue policies at odds with its individual mission.

The accreditation process has strayed from the purpose Congress originally intended, but it can be changed to provide students and parents with real information about the quality of education a particular school provides. Yesterday, I introduced H.R. 5501, the Higher Education Accrediting

Agency Responsibility Act. This legislation eliminates the requirement that schools be accredited in order to receive federal student aid funds. It will help to open the accreditation process to competition, which will encourage accreditors to evaluate results rather than inputs and provide prospective students and parents with meaningful information about a school.

Under a voluntary system, colleges and universities that seek accreditation will demand from an accreditor quality advice and recommendations that improve the education offered to their students. I am sure that this hearing, and others, will help provide us with a better understanding of the accreditation system and how we can bring about the needed improvements.

Thank you very much.

**Chairman McKeon**. I ask unanimous consent for the hearing record to remain open 14 days to allow members statements and other extraneous material referenced during the hearing to be submitted in the official hearing record. Without objection, so ordered.

WRITTEN OPENING STATEMENT OF REPRESENTATIVE THOMAS E. PETRI, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C. – APPENDIX C

**Chairman McKeon**. Our first witness this morning will be Dr. Judith Eaton. Dr. Eaton is President of the Council for Higher Education Accreditation, where she has served since 1997. Previously, she was the Chancellor of the Minnesota State colleges and universities. In addition, Dr. Eaton has served as President of the Council for Aid to Education, the Community College of Philadelphia, and the Community College of Southern Nevada.

**Mr. Tierney** introduced Dr. Cook.

Then we will have Dr. Laura Palmer Noone. Dr. Palmer Noone is the Chief Administrative Officer and President of the University of Phoenix, the nation's largest private university. She has also served the University of Phoenix as Provost and Senior Vice President for Academic Affairs.

**Dr. Palmer Noone** is a frequent guest faculty lecturer at the Harvard University Graduate School of Education's Institution for Education Management and for the Management of Lifelong Education Program. In addition, she serves as the Vice Chair of the U.S. Department of Education's National Advisory Committee on Institutional Quality and Integrity.

I would like to ask Mr. Petri if he would introduce the Honorable Hank Brown.

**Mr. Petri**. It is a delight for me to introduce a very respected former colleague who has proven that there is life after Congress, both the House and the Senate, who has had a distinguished year both as a Representative of the Sixth District in Colorado, but and also 4 years as a university president and then earlier this year became President of the Daniels Fund, which is a Colorado philanthropy organization that focuses on helping promising high school students obtain a college education. So he is in a position to advise us both from a legislative perspective and from

administering a university, discovering the wonders and challenges of that, and how we can improve the situation.

**Chairman McKeon**. Thank you.

I yield now to the gentleman from Virginia, Mr. Goodlatte, to introduce our last witness.

**Mr. Goodlatte**. Thank you, Mr. Chairman. I too want to welcome my friend, Senator Brown. But I am particularly honored that we have with us today the president of the largest university in the Sixth Congressional District of Virginia and, Mr. Chairman, I would note, a university that you visited where you previously met President Linwood Rose.

**Dr. Rose** has a long, distinguished career at the university. He is actually only the fifth president of James Madison University in its 94-year history. He has only covered 4 of those 94 years so far, so he has a long, long way to go as president. He also previously served in the administration of the university for 23 years before that.

James Madison University has been repeatedly ranked as the top-rated Masters-level public university in the South in polls conducted by U.S. News and World Report. JMU, for the 8th year in a row, ranked number one in the South among public universities, and annually ranks as one of the nation's best state universities in terms of value.

I also want to note, Mr. Chairman, that on the same visit that you made last year to James Madison University, Congresswoman Mink joined us as well. And knowing when we hold field hearings what a sacrifice it is for Members to visit another congressional district, other than their own, during time away from Capitol Hill, I especially appreciated your scheduling that hearing. But I also especially appreciated Congresswoman Mink giving up a day of her time to visit Harrisonburg and Roanoke and some of the institutions in my district.

This is a topic in which I have a great deal of interest. The chairman also knows of his help to me for another institution in my congressional district, which has experienced some problems with the current accrediting system in the country; and so I will, with great interest, look forward to hearing the testimony of all the witnesses, but most especially my friend, Dr. Rose.

Thank you, Mr. Chairman.

**Chairman McKeon**. Thank you, Mr. Goodlatte.

We will now hear from the witnesses, beginning with Dr. Eaton. As you can see there are lights in front of you. When you start, a green light will come on and then that means you have 4 minutes; and then the yellow light comes on and that means you have a minute; and then when the red light comes on, your time is up. Your full testimony will be inserted in the record, so if you want to paraphrase or shorten it, you have the 5 minutes; and then we will have time for the members to ask questions under the same guidelines.

**Dr. Eaton**.

## *STATEMENT OF DR. JUDITH S. EATON, PRESIDENT, COUNCIL FOR HIGHER EDUCATION ACCREDITATION, WASHINGTON, D.C.*

**Dr. Eaton**. Thank you, Chairman McKeon. It is a pleasure to be here today. Before I begin my comments, please accept on behalf of the Board of Directors of the Council for Higher Education Accreditation our condolences on the death of Congresswoman Mink. I know I speak for all my colleagues in higher education in the room in saying she will be sorely missed and contributed greatly to our work over the years.

I am Judith Eaton, President of the Council for Higher Education Accreditation. CHEA, as it is affectionately called, is a national coordinating body for accreditation, both institutional and programmatic accreditation, here in the United States. We count some 3,000 degree-granting colleges and universities among our members, as well as some 60 accrediting organizations.

I am here today to provide a brief overview of accreditation, to speak to several of the major challenges of accreditation, and to indicate some of the accrediting communities' interests as we move toward the reauthorization of the Higher Education Act.

Accreditation is the process of external quality review of higher education. Its purpose is to assure and to improve that quality. Accreditation review is focused on institutions and programs. The institutions may be degree or nondegree, nonprofit or for profit. The programs range from law to medicine to business to social work to the arts to psychology.

Accreditation is more than 100 years old, and it is indeed an extensive enterprise. There are some 80 accrediting organizations in the United States, and as of last year, they accredited more than 63 institutions and 17,500 programs. That is done, by the way, with an accreditation staff of paid professional and support individuals, full- and part-time, of just about 500 people along with several thousand volunteers in any given year that review various institutions and programs.

The accreditation process has these key elements:

The application of standards of quality developed by the accrediting organizations;

Self-evaluation by the institution or program; and then

Peer review of those institutions and programs. Accreditation results in a judgment about accredited status.

Accreditation has enjoyed a 50-year relationship with the federal government. Institutions and programs must have accredited status to be eligible for federal student aid and other federal funds; and government has a long history of relying on accreditation for information about the quality of these institutions and programs.

Accrediting organizations themselves are reviewed for quality and effectiveness both by the federal government through the United States Department of Education and through our organization. We have recognition standards, and we review various accrediting organizations based on those standards to test the quality of their operation.

Accreditation is the primary mechanism used throughout higher education to assure and improve quality, and while the details of accreditation practice may not be widely known, students, the public and policy-makers do know that being accredited is a powerful signal about the quality of a higher education institution and program.

We believe accreditation has played a major role in establishing the United States higher education, in the eyes of many, as the best higher education system in the world.

If I may, Mr. Chairman, you mentioned earlier an assumption that accreditation provides quality. Is that accurate? We would say that particular assumption certainly is warranted.

Moving on to some of the major challenges facing accreditation at this time, I will mention three. First, there is the challenge of accountability and providing more information about student learning outcomes. Increasingly, accreditation standards are being revised, and have been revised by various accrediting organizations to assure that institutions and programs provide this evidence of student learning.

Increasingly, accrediting organizations are taking those who are indeed skilled at collecting and evaluating evidence of student learning, and consider student learning as part of the information needed to make judgments about accredited status, and putting them on their accrediting teams which go out to visit institutions and programs.

CHEA, I might point out, has been instrumental in that capacity building and accreditation in the last several years. We have, for example, designed and tested an accreditation review solely for competency-based institutions. We tested this at Western Governors University. We last year published a key decision-making model for incorporating outcomes in accreditation review; that is, what do accrediting organizations have to do better to more fully address student learning outcomes in their reviews?

We have just concluded a series of workshops, working with accrediting organizations in this capacity building. We plan to continue our efforts into next year, working directly with accrediting commissions addressing such topics as the following: what good practices are there that can be used by various accrediting organizations as this relates to student learning outcomes?

We are also providing additional public information about graduation rates, retention, student mobility; and we have certainly taken on the issue of assuring quality and distance learning through revision or creation of new accreditation standards for this purpose.

Three things quickly as we prepare for reauthorization:

We want to sustain our valuable partnership with the federal government.

Further, we want to make sure that this partnership continues the useful division of labor between our government and accreditors, accreditors having primary responsibility for assuring academic quality, government having primary responsibility for assuring that Federal funds are spent wisely.

We also look forward, Mr. Chairman to continuing the very important work you and Congresswoman Mink initiated with reducing burden in higher education through reducing regulation, the FED UP initiative, and we hope that this features prominently in the higher education reauthorization.

I thank you for your attention, and I would be happy to respond to any questions.

WRITTEN STATEMENT OF DR. JUDITH S. EATON, PRESIDENT, COUNCIL FOR HIGHER EDUCATION ACCREDITATION, WASHINGTON, D.C. – APPENDIX D

**Chairman McKeon**. Thank you.

**Dr. Cook**.

## *STATEMENT OF DR. CHARLES M. COOK, DIRECTOR, COMMISSION OF INSTITUTIONS OF HIGHER EDUCATION, NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, BEDFORD, MASSACHUSETTS*

**Dr. Cook**. Thank you, Mr. Chairman.

I am Charles Cook, Director of the Commission of Institutions of Higher Education of the New England Association of Schools and Colleges, one of eight regional accrediting entities in the United States that accredit colleges and universities. I appreciate the opportunity to testify before you today describing the nature and work, as well as the challenges facing regional accreditation.

Accreditation of institutions of higher learning is an American invention. It was created nearly a century ago by the colleges and the universities themselves as a nongovernmental response to the need for a mechanism to identify those institutions of higher learning worthy of attendance.

Since its inception, it has been a remarkably successful enterprise in providing meaningful quality assurance upon which our citizenry, government at every level and industry have come to depend. Indeed, accreditation is now an essential for any legitimate institution of higher learning.

As noted, there are eight regional accrediting commissions. Each accredits those degree-granting institutions within a specific multi-state geographical area; and together they accredit

approximately 3,000 colleges and universities.

Regional accreditation has become the most sought after medallion, recognizing institutional quality in American higher education. By definition, accreditation is a status granted to an educational institution found to meet or exceed stated criteria for educational quality. Regional accreditation applies to the institution as a whole, and while it does not guarantee the quality of individual programs or graduates, it does provide reasonable assurance as to the context and quality of the education offered.

If regional accreditation is about quality assurance, it is also about quality improvement. That is, accreditation processes are designed to identify institutional weaknesses and otherwise facilitate and to encourage positive institutional change.

Accreditation standards among the eight regional commissions vary in detail. However, in terms of the values they express, their general outline and objectives are quite similar. Because the object of attention is the institution as a whole, standards address not only educational programming, but also those resources that directly support it, and such institutional characteristics as student services, fiscal well-being, and administrative capacity and integrity.

Regardless of the details found in the standards of each commission, the institution found to meet these standards could be said to have appropriate purposes, have the resources to accomplish those purposes, be able to demonstrate that it is accomplishing its purposes, and give reason to demonstrate that it will continue to accomplish its purposes into the foreseeable future.

If the regionals' criteria are similar, so too are the processes by which the standards are applied. Every institution undergoes a periodic evaluation, normally every 10 years, with opportunities to monitor institutional developments in the interim.

The evaluation process begins with institutional self-study; that is, the college or university, through a broadly participatory effort, is asked to assess itself against accreditation standards, identifying what it does well, to determine the areas in which improvements are needed and to develop plans to address those needed improvements.

With the results of this effort in hand, a team of peers, administrators and faculty from other accredited institutions, undertake an evaluation of the institution, again applying accreditation standards and writing a report of their findings. This document is considered by the accreditation commission itself, which makes the determination regarding accreditation and also, in doing so, typically identifies areas needing the institution's attention.

It is worthy to note that the work of regional accreditation is carried out primarily by volunteers. The commissions themselves have only small paid staffs. Across the United States every year, literally thousands are involved in the work of accreditation, again on a voluntary basis.

American higher education has been and continues to be remarkably dynamic. Innovative programming, off campus and evening and weekend classes and, more recently, electronically mediated instruction are examples of this. These developments have tested conventional

assumptions, raised fresh questions about the essential nature and content of the educational experience and the resources required to support it.

Regional commissions have responded by maintaining higher standards and also recognizing that the education can be provided in a variety of ways. Over the years, too, the focus of attention in the regional commissions has shifted the content of its standards increasingly to educational outcomes or learning outcomes.

We believe that regional accreditation has the support of its members and the public at large, but as a human institution, it is not perfect. Sometimes it finds itself behind the curve in terms of the developments at institutions.

Another challenge we have is to insert a meaningful emphasis on student learning outcomes into our criteria. Here we believe we are somewhat ahead of our colleges and universities.

Let me sum up by saying that a higher education is the envy of the world for good reason. We wouldn't lay claim to the notion that accreditation is the cause of this. Nonetheless, it is one of the important conditions that has produced that result. It is for that reason that many countries throughout the world seek to learn from American accreditation experience and adapt it to its circumstance.

We look forward to continuing to serve our member institutions and the public by providing meaningful quality assurance. Again, I appreciate the opportunity to testify before you today.

WRITTEN STATEMENT OF DR. CHARLES M. COOK, DIRECTOR, COMMISSION OF INSTITUTIONS OF HIGHER EDUCATION, NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, BEDFORD, MASSACHUSETTS – APPENDIX E

**Chairman McKeon**. Thank you.

**Dr. Palmer Noone**.

## *STATEMENT OF DR. LAURA PALMER NOONE, PRESIDENT, UNIVERSITY OF PHOENIX, PHOENIX, ARIZONA*

**Dr. Palmer Noone**. Good afternoon, Chairman McKeon and distinguished members of the House subcommittee. It is my honor to have been invited today to testify.

I am here as the President of the University of Phoenix, the largest private university in the United States. The university is a regionally accredited institution accredited by the North Central Association, one of the regional accrediting bodies of the U.S. However, because of our unique, geographically distributed system, we operate within the borders of all six of those geographic territories.

The system of regional accreditation has served the University of Phoenix well over its 26 years. However, we believe the regional associations are demonstrating they are equipped to judge

the academic quality of institutions. We do not, as an institution, support further overlap of the Department of Education's role in the traditional quality assurance function of the accreditation process.

The traditional triad of the accrediting body's responsibility for quality assurance, the Department of Education's oversight of compliance and the States' role in consumer protection continues to serve the public well. As we look forward to the future and meeting the growing and diverse educational needs of the country, it is imperative that this triad stays appropriately balanced, while ensuring quality.

And strength of educational programs remains key. Unnecessary and burdensome overlap in the roles and responsibilities threatens to weigh down this process and prevent institutions of higher learning from quickly responding to and meeting the needs of the Nation's workforce.

The current system of overlap has already created many challenges for institutions such as mine. The geographic expansion of an institution has created such a challenge for the regional system because many institutions now operate in multiple regions. The Council of Regional Accrediting Associations, CRAC, created an interregional protocol for dealing with these challenges through fostering joint cooperative accreditation visits.

The University of Phoenix was among the first institutions to participate in this new protocol, and for the most part, it has worked well. But the time and the expense of the process have been somewhat onerous.

It is obvious that we, as an institution, have taxed the abilities of the regional bodies to cooperate. Each regional accreditor evaluates according to the same criteria, but judges the compliance with different standards. When an institution such as mine goes through an accreditation visit, it is often faced with meeting the standards of six different regions, as well as those of the State in which it operates.

Compliance with these differences is not a question of simply meeting the highest level of standards, since the standards are sometimes inconsistent and, at worst, disconsonant. These differences result in institutions' and accrediting bodies' refusal to acknowledge accreditation by another region as equivalent, thus reducing the portability of degrees. Students then have fewer options for transfer and often must repeat courses, which may result in additional student debt load.

From a public policy perspective, it is clearly preferable to have baseline recognition count for transferability of degrees and credits, and that should be ensured with accreditation by a recognized body.

Institutions such as the University of Phoenix, who operate across state lines, also have the ability to help the nation in critical workforce shortages such as in the areas of nursing and teaching. Yet we are faced with another problem. As we jokingly refer to it, the states each think they invented higher education. As a result, each state feels the need to enforce a duplicative level of oversight, which sometimes leads to a burdensome level of oversight that rises to the level of accreditation review. We recognize that this may be a cost of doing business, but it does create a

structural impediment to any real national initiatives that might allow us to deal with critical shortages in any effective way.

I would suggest that this committee consider the following issues:

Accreditation as a method of self-regulation should continue, but with an emphasis on standardization amongst accrediting bodies to allow for portability of degrees and workforce preparedness.

State regulations should then, in turn, focus on consumer protection and not be viewed as a substitution for accreditation nor another level of accreditation review.

This afternoon, I would also like to briefly mention the work of the National Advisory Committee on Institutional Quality and Integrity, referred to as NACIQI. Last October, I was pleased to be asked to serve as a member and vice chair of this committee, which plays an important role in the accreditation arena.

NACIQI was created by Congress in 1992 and held its first meeting in 1994. The committee is comprised of 15 members who are knowledgeable concerning higher education and who represent all sectors and types of postsecondary institutions. The primary function of the committee is to advise the Secretary on accreditation, as well as institutional eligibility and certification issues; and to date, the committee has focused most of its attention on accreditation matters.

The Secretary's criteria pertain to the agency's accreditation policies and procedures and, most importantly, the standards that the agency expects its institutions and programs to meet in order to gain or retain accreditation status.

The agency is required to have standards that address certain areas. For instance, the agency must cover curricula, standards that deal with student achievement, standards that deal with students' support services, and so forth. After reviewing all written documentation and considering oral argument, NACIQI votes on whether to recommend recognition and forwards its recommendation to the Secretary of Education.

It has been my experience that the members of NACIQI have been diligent in exercising their responsibility to the Secretary, to the education community, to the taxpayers, and to the students, who are the consumers that deserve quality education. I have submitted additional information regarding the Department of Education and NACIQI into the record, and I remain here for you to ask any questions you may have about my testimony.

Thank you very much.

WRITTEN STATEMENT OF DR. LAURA PALMER NOONE, PRESIDENT, UNIVERSITY OF PHOENIX, PHOENIX, ARIZONA – APPENDIX F

**Chairman McKeon**. The Honorable Senator Brown.

## *STATEMENT OF THE HONORABLE HANK BROWN, PRESIDENT AND CEO, DANIELS FUND, GREELEY, COLORADO, AND FORMER UNITED STATES SENATOR FROM THE STATE OF COLORADO*

**Senator Brown**. Thank you Mr. Chairman. Let me express my appreciation for an opportunity to share some thoughts with you today and commend the committee for this hearing. The subcommittee's willingness to take testimony and to considering the question can be a great help as you view reauthorization in the coming year.

I want to commend for your study and your reading a report just issued by the American Council of Trustees and Alumni. It is entitled "Can College Accreditation Live Up to Its Promise?" I think it contains an excellent overview of the question, and has some excellent suggestions that I believe you will find worth reviewing and looking at.

Mr. Chairman, I want to make it clear that I am here to testify as to my own views and not necessarily to represent either the organization that I work for now, which is the foundation, or the university that I worked for in the past or other entities, who should not be blamed for my views that are a bit different from some of the other members of the panel. Simply let me suggest to you what I believe is a reality of the past two or three decades in American higher education.

There has been a dramatic and, I believe, a scandalous grade inflation that has taken place countrywide. You simply cannot look at higher education in this country and be comfortable with what has happened with regard to grade inflation.

The reality is that grade inflation has hit all of our institutions, or almost all of our institutions, from the best to one to the worst. The fact is, this has not been a factor, nor has it been detected, nor has it been, I think, checked by our current system of accreditation. It has gone unchecked, and it threatens the very quality of the institutions that we have.

Secondly, I don't believe you can look at our system of higher education and the institutions therein and not be shocked by the abandonment of strong core curriculum requirements across the board. Almost without exception universities have moved away from a strong, vibrant, healthy core curriculum requirement.

Are there exceptions? Yes, there are. But there are fewer and fewer of them. So I take a different view with regard to quality assurance, and it is at least my view that the current system of accreditation does not assure quality and, thus, does not meet the mandates set out in the 1952 act.

There is an organization that has, at least in my university, asked important questions in the last few years. They ask about curriculum. They ask about retention. They ask about grade inflation and a number of other quality indicators that were not asked about in the accreditation system. It is the State itself that helps fund the university, and also has a direct interest in its quality; and they ask tough questions. My hope is that the committee would be willing to consider

making it clear that it is possible for the States that wish to, to set up their own accrediting system.

You would not have to eliminate the current accreditation organization that now exists, but I believe the States can provide a positive alternative, a competitive accreditation system that will look at real quality and ask tough questions and help ensure, I think, a stronger system of accreditation.

Mr. Chairman, I look forward to responding to any questions that the committee might have. Thank you.

WRITTEN STATEMENT OF THE HONORABLE HANK BROWN, PRESIDENT AND CEO, DANIELS FUND, GREELEY, COLORADO, AND A FORMER SENATOR FROM THE STATE OF COLORADO – APPENDIX G

**Chairman McKeon**. Thank you.

**Dr. Rose**.

## *STATEMENT OF DR. LINWOOD H. ROSE, PRESIDENT, JAMES MADISON UNIVERSITY, HARRISONBURG, VIRGINIA*

**Dr. Rose**. Thank you, Mr. Chairman, members of the subcommittee. It is a pleasure to be with you today.

As has been indicated, I serve as President of James Madison University in Harrisonburg, Virginia. James Madison is a selective, public, comprehensive university of 15,400 students. The institution is generally regarded as a leader among colleges and universities in the assessment of learning and skill development. I appreciate the opportunity to offer a few remarks to the committee on the topic of institutional accreditation.

James Madison University is accredited by the Southern Association of Colleges and Schools' Commission on Colleges. The Commission on Colleges of the Southern Association of Colleges and Schools is the recognized regional accrediting body in the 11 U.S. southern States and in Latin America for associate, baccalaureate, master's and doctoral degrees. The Commission on Colleges is the representative body of the College Delegate Assembly and is charged with carrying out the accreditation process.

Having been at JMU for 27 years, I have participated in and observed the regional accreditation process firsthand. As a member of the Executive Council of the Commission, I have witnessed the transmission of the accrediting body's expectations from one of establishing minimal thresholds for performance to the promotion of campus culture for institutional effectiveness and accountability. I have seen this move from the measurement of inputs as surrogates for quality to a focused effort on the evaluation of student learning and progress.

Although the procedure will change in January 2004, each college and university applying for accreditation or renewal of accreditation is currently required to conduct a comprehensive study of its purpose, programs and services. On each campus, faculty administrators, staffs, students, trustees, and others serve on committees that study all aspects of the institution, report their findings and offer advice on improvement. This process results in a document evaluating the institution's effectiveness in reaching its stated goals and its compliance with the criteria.

At the culmination of the self-study, the Commission on Colleges sends a visiting committee of professional peers to the campus to assess the educational strengths and weaknesses of the institution. The written report of the visiting committee helps the institution improve its programs and also provides the basis on which commissions--excuse me, on which the commission decides to grant, continue, reaffirm or withdraw accreditation.

During the typical 4-day visit, committee members examine data and conduct interviews in order to evaluate the quality and the accuracy of the self-study and ascertain whether the institution is in compliance with the criteria. The committee offers written advice to the institution, develops a consensus on its findings, and completes a draft report. Finally, the committee presents an oral summary and an exit report to the chief executive officer and invited institutional officials on the last day of the visit.

The departure of the committee from campus does not mark the end of the accreditation process. The visiting committee report and the response of the institution on the findings of the economy are reviewed by the Committee on Criteria and Reports, a standing committee of the Commission. The Committee on Criteria and Reports recommends action on accreditation to the Executive Council of the Commission. The Executive Council, in turn, recommends action to the Commission on Colleges, which makes the final decision. These decisions are announced to the College Delegate Assembly during its annual business session.

In a typical cycle, reaffirmation of accreditation occurs every 10 years. James Madison University just last year completed our self-study, and we hosted a visiting team of peer professionals in April. We have responded to the visiting team's recommendations and await action by the Commission on Colleges at its December meeting.

Like James Madison, most institutions will correct any deficiencies identified by the peer review process. If an institution fails to correct deficiencies, it may be placed on sanction or may lose its accreditation depending on the seriousness or duration of the deficiencies.

Earlier, I referred to a transition in accreditation philosophy and methodology. The membership concluded that the standards and practices employed by the COC in accreditation needed review and modification. Following a comprehensive review and drafting process, led by a 13-member steering committee, the total membership of the Commission on Colleges adopted new principles of accreditation foundations for quality enhancement in December of 2001.

The accreditation review project had five goals:

First, develop valid, relevant, clear, and concise standards that concentrate on best practices in higher education and recognize the Commission's diverse membership;

Two, streamline the internal review process; create better value for the institution and make it more cost effective;

Three, enhance the effectiveness, efficiency, and consistency of the external review process;

Four, increase attention to student learning outcomes and institutional improvement; and finally,

Five, ensure that standards and review processes foster a strong culture of institutional integrity, are appropriate for the changing higher education environment, and benefit the institution and the public.

The new process is reliant upon two key principles: institutional integrity and commitment to quality enhancement. It is divided into three sections: core requirements, comprehensive standards incorporating mission, governance and effectiveness, programs and resources, and federal mandates not included as part of the comprehensive standards.

The institutional self-study is replaced in this new process by an enhanced institutional profile submitted by the CRC, by compliance certification and by the institution's Quality Enhancement Plan. These documents will be reviewed by the off-site peer review committee and on-site peer review committee and, ultimately, by the Commission.

It is hoped that the new process will be;

First, less prescriptive;

Second, allow for greater institutional flexibility;

Third, focus institutional resources and manpower on issues of greatest concern to the institution;

Fourth, be more cost effective; and

Fifth, assume an institutional level of maturity.

Eight institutions have piloted the new review procedures in their accreditation reviews over the last 2 years. The new standards and review processes modified in accord with the lessons learned from the pilots will become fully effective in January 2004. Regional training sessions are now under way for institutional leaders to learn more about the application of the principles.

While the methodology and focus of peer review may change over time, the primary purpose of accreditation remains to enhance educational quality throughout the region by improving the effectiveness of institutions and ensuring to the public that institutions meet

standards established by the higher education community.

Mr. Chairman, I appreciate the time today. Thank you very much.

WRITTEN STATEMENT OF DR. LINWOOD H. ROSE, PRESIDENT, JAMES MADISON UNIVERSITY, HARRISONBURG, VIRGINIA – APPENDIX H

**Chairman McKeon**. Thank you.

Well, this is a great panel that we have here. I wish we could spend hours just kind of in a little roundtable, learning from each of you. I am going to use my time to ask a few questions here.

**Dr. Eaton**, there is some concern that schools accredited by regional accreditors refuse to accept the transfer of credits from schools that offer similar courses, but are nationally accredited. Is this a problem? And what can we do to ease the transfer of credit?

**Dr. Eaton**. Thank you, Mr. Chairman.

We do have some instances where students will experience difficulty transferring credits from nationally accredited institutions to regionally accredited institutions. We have limited evidence of this. Its happening once is undesirable; I am aware of that. CHEA has acknowledged that we need to do work in this area.

We have developed and can make available to you a policy statement on transfer of credit that we ask our accrediting organizations to follow. It is several pages long, but the fundamental point in that transfer policy statement is that while transfer of credit decision-making should be done at the institutional level, it is an academic decision about curriculum, about standards; that nonetheless, when making this decision and considering these credits, institutions should not rely only on accredited status. They should look at more than accredited status, rather than simply reject from consideration credits that students are attempting to transfer, because of the accredited status of the sending institutions.

We have worked with the 19 institutional accreditors, regional and national, in the United States, whether they were part of CHEA or not, in developing this and in developing a follow-up document, a transfer framework where we attempted to provide some concrete suggestions on what institutions can do as they consider and then make decisions about transfer of credit. Given our strong belief that this decision-making must remain at an institutional level, we think this kind of policy framework, and the types of suggestions that we have in the framework will be helpful to these institutions and will, frankly, remind them about the significant responsibility associated with transfer of credit.

**Chairman McKeon**. Thank you.

**Dr. Cook**, how have you and other accreditors addressed student-learning outcomes? What assessments do you review to evaluate if a student has learned?

**Dr. Cook**. I have honestly said that this has been one of our great challenges.

There has certainly been an emphasis, on student learning outcomes in the accreditation process for at least 15 years. Within our criteria, we ask institutions to develop appropriate mechanisms to assess the results of the learning process, because our institutions vary a great deal in terms of mission, and of types of programs. We don't have a recipe book for them.

But we have worked closely with institutions to help them in this area. We, along with several of the other regional commissions, have enjoyed grant support to facilitate this. Honestly said, this is an area of continuing effort and concern. I anticipate that we will be working on this for some time.

Institutions, particularly faculty, often find this a difficult area. Those on the outside may see it somewhat easier than do faculty.

Certainly there are specific examples. For example, a community college in New England spends a lot of time assessing their general education outcomes. Can their graduates read and write at a collegiate level? Do they have the kinds of skills that might be provided in a given vocational program? For liberal arts colleges, the challenges are greater because the learning outcomes, including creating good citizens and good thinkers, tend to be more elusive.

**Chairman McKeon**. You have probably all participated at one level or another in the accreditation process. When accreditors come to the school, do they spend any time in the classroom? Do they look at anything that the instructors are doing? Do they do any interviewing of students? Do they do any interviewing of employers that employ students when they leave?

Anybody.

**Dr. Palmer Noone**. It has been my experience that the accreditors do sit in the classroom and evaluate what the faculty is doing in the classroom, and also speak with students and faculty regarding their experiences.

It has not been my experience that they have spent any time with employer surveys. However, we have always provided that information to them, so maybe they have simply accepted that as documentary evidence.

**Dr. Eaton**. Mr. Chairman, not recently, but I have been a consultant, evaluator, and a team member in three different regions in regional accreditation long before I was ever in this position. We did all of the above, including having meetings with advisory committees of employers, groups that were advising specific fields, for example, business or computer technology. We did look at curriculum, we did meet with faculty, we did meet with students, and we did meet with employers and representatives of specific employers.

**Chairman McKeon**. Is that standard? Well, my time is up. But you talked about a 4-day visit. Is that all done within that 4-day period?

**Dr. Rose**. Yes. It is conducted within the 4-day period. I have not experienced external visitors to the campus actually going to classes that are currently active. However, it is a very common experience for accrediting teams to visit with faculty members, review course syllabi and things of that nature. That kind of interaction does occur.

**Senator Brown**. My experience would be that sessions with students are often not focused on their academic experience as much as general concerns about the university. I have never heard the time that the folks spend in the classroom be remarked on as anything but minimal, if it existed at all.

I might say though that at least the state I am from did care about outcomes and did assess them. They assessed them by looking at professional exams that people took and a variety of other things indicating the quality of the courses.

It brings up one of the potentials here that is not being met by the current accreditation system, but that it is possible to meet if you would allow States to enter this arena as well.

**Chairman McKeon**. Thank you.

**Mr. Hinojosa**.

**Mr. Hinojosa**. Thank you, Chairman McKeon. I apologize that I was not here for the first part of the presentation made by members of this panel. I was working on some legislation and some bills that were being presented on the House floor.

I want to take this opportunity to ask some questions, and will address the first one to the Honorable Mr. Hank Brown. I understand that you are a former Congressman, a former United States Senator, and for that I want to thank you for your wonderful public service given to this country and to all the people of this nation. I want to ask you, with the experience that you have as a former president of a university in Colorado, how would you go about improving the accreditation of colleges, and how would you advise us to take advantage of the reauthorization of higher education that is coming up this next year so that we can require accountability of colleges receiving Federal monies for research, for program development, for outreach and recruitment of students into their universities, and finally helping students graduate, something that I am very concerned about? How would you do that?

**Senator Brown**. Congressman, thank you for your kind words. It is true that I have had a difficult time holding a job. But I guess my impression after leaving academia in July is that this field would benefit from competition. The current 1952 Act, if I understand it correctly, does not prohibit other associations from offering accreditation. So it is not a monopolistic act in that sense, but it is boiled down to a very limited choice, at least in the accreditation field.

One of the areas I hope you look at is making it clear that states can indeed put together an accreditation system if they wish to in this area. I am not sure it is prohibited, but I think clarification on that would be helpful.

Secondly, I would hope the act would encourage the looking to objective standards for measuring quality. And I am not talking about inventing new ones, but I think there are some numbers that exist. If you major in accounting, the CPA exam is a national exam that measures your abilities and your knowledge in that area, and it is one that is reasonable for accounting majors to look to. Engineers have a similar exam. Teachers in many States have a similar exam. Students going on to graduate school have the opportunity to take the Graduate Record Exam. I would not suggest to you that there is one exam for everyone or that everyone should have an exam to look at. But I think there are enough good measures in that area, we ought to encourage accreditation reviews to take a look at results enough to draw the attention of universities to preparing students for the objective exams that their students do need to face.

So, talking about competition, I think it would be helpful to draw attention to comprehensive exams that measure outcomes. I do think a greater emphasis in terms of the accreditation process and looking at outcomes, more time in the classroom, et cetera, would be helpful as well.

**Mr. Hinojosa**. I thank you for the response. And how would you require that colleges that have a high dropout rate do something about it? I can tell you that Hispanic students in colleges have a record of about half of them dropping out even from completing their community college, which is in most cases a 2-year period to get that associate degree. How would you go about correcting that?

**Senator Brown**. One of the most interesting things I did as president of the university was try to think through that problem. I went around to the high schools in Colorado and asked the high school counselors what they thought and who did the best job. Interestingly enough, a number of the high schools agreed that the U.S. Army did the best job. I said no, I am talking about recruiting for college. But what the Army did in their recruiting is that they went into the homes of Hispanic students. As you are obviously well aware, Hispanics typically come from a very close family relationship. The desire to leave home that is incumbent in many of us is not necessarily incumbent in that family structure. Their talking to the families was a key ingredient. We think we made a difference by involving the family in that recruiting.

The foundation I am with specializes in helping low income students go to college. Their standard is not the student's grades, but rather the student's potential as a human being. We think the key of our efforts is to prepare students for college. We have been successful with more than 90 percent of the students that go through our prep program: they go to college, stay in college, and we believe they will graduate. I don't mean just prepare them academically. I mean prepare them in terms of what to expect, how to study, how to prepare, what life is like, and so on. At least it is our sense that in a significant portion of low-income families, particularly ones where no one in the family has gone to college, a significant effort needs to be made to prepare them for that life, because it is different than what they expected and different from what other students have in their

backgrounds. That preparation is a key ingredient for how they do when they get to college.

**Mr. Hinojosa**. Thank you very much.
Could Dr. Eaton possibly respond to my request, Mr. Chairman?

**Chairman McKeon**. I think we need to go to the other members.

**Mr. Hinojosa**. Yes. I didn't realize that they had come in. Go ahead.

**Chairman McKeon**. Thank you. Mr. Petri.

**Mr. Petri**. Thank you. I have a concern and a question. How do we do it? My understanding is that the federal government really didn't get into this business until about 1952, after we got quite active through the G.I. Bill, various other grants, and education grant programs. One of the motives for having accreditation was to make sure that they were legitimate schools, that they weren't fly-by-night outfits, and that people weren't being ripped off. As time went on, we ended up experiencing very high default rates on our student loans. As a result, we set up a whole new procedure to try to deal with that problem because the accreditation program didn't really work. But we didn't examine the accreditation program. One of the concerns is that we are delegating to private organizations, rather than government organizations, whether or not colleges, universities, and schools in the United States have access to enormous amounts of federal money. That one decision determines whether or not they survive. It is almost too much on a one-switch decision. As a result, almost no one, if anyone, is ever really disaccredited. They are kind of nudged along and put on various lists and so on. It seems to me that we haven't thought through very well what we are really trying to do with this process and how it works and what the accountability should be.

So I wondered in that connection, Senator Brown, if you could just tell us how it works from your point of view as something coming in from outside, into academic life as a university administrator and then confronting the accreditation. Does it happen every year or is it something that only happens every decade? Is there a constant review so that people know what is going on? How does this actually work?

**Senator Brown**. I think that the panel members have done a wonderful job in walking through that. The university I was at had a very pleasant experience with their accreditation. During my tenure we got a clean bill of health, which was the first clean of bill of health they have gotten in over 2 decades.

What had happened in the past was that they would have had visits where they were never denied accreditation, but a revisit was scheduled. That ended with the very good accreditation we had.

I am going to say that I found it to be a bizarre experience, because I looked at the records of the previous accreditation that apparently was not good enough to end the question. You simply couldn't tell from the report what the concern was. It wasn't spelled out. For example, the library wanted more money, and so they were successful in getting in that accreditation report a notation that the library should receive more money in future years. I found, on checking out, our library

got more money as a portion of the university budget than other libraries in the nation did from other universities. So it seemed to be a bizarre note.

The accreditation offered an opportunity for entities within the campus to come and express their objections or concern, or lobby for more money from the trustees. But in terms of specific suggestions that dealt with substantive issues on the campus, at least the previous accreditation reports I looked at were not very helpful nor very clear in that way. However, it sent a clear message that you had better not have anybody unhappy on the campus when the visit comes around.

**Mr. Petri**. Is it an expensive process? Do you pay to the accrediting associations for the opportunity to be accredited?

**Senator Brown**. There would be other experts here that are much more able than I to address that. But my impression was that the fees that you pay for membership are not extraordinary; they are an expense, but they are not overly high. You do pay some expenses for the visit. Probably the largest expense is the preparation for it.

My own sense about that preparation expense is that while it is a significant expense, it is probably reasonable for an institution to go through that self-examination process. So I personally ended up feeling there was value towards that portion of the expense.

**Mr. Petri**. Would it make sense to allow people to choose one of the regional accrediting organizations rather than just stick to their own regions? There seems to be some element of competition that way. If they are all qualified to do the job, why do you have to take the one that you happen to reside in? Why couldn't you choose a different one if it made sense?

**Senator Brown**. My impression is that there is some flexibility. There is simply not a lot of accrediting agencies, though. That is a phenomenon that the committee may want to look at in this regard. Obviously, I have urged you to consider making it clear states could do it, but my impression is that you haven't created a monopoly here. It is possible for other organizations to come forward. I do think the process would benefit by some additional competition in that area, though.

**Chairman McKeon**. I would like to welcome a good friend, my State Assemblyman George Runner and his wife, who will become the Assemblyman next year. They are here in town on special invitation from the White House. He authored a bill in California, the Amber Alert, which has been very, very big in California, and he is here to work with the White House on trying to get that to become a national law. Welcome George and Sharon. Thank you.

**Mr. Goodlatte**.

**Mr. Goodlatte**. Thank you, Mr. Chairman. Senator Brown, I was pleased to hear you express some concern about grade inflation and the lack of core curriculum requirements. I wondered if you had some specific proposals for how dealing with those might be incorporated into the

accrediting system.

**Senator Brown**. Yes, Congressman, I do have some thoughts in that area. If you permit me, I think it has reached scandalous proportions, and it is among the greatest schools in the country as well as those that are not so great. Recently, Harvard got a great deal of attention when 91 percent of their graduating class graduated with honors. That means you literally could be in the bottom 10 percent of your class and graduate with honors. I think the expression is, what a country.

Yale was embarrassed a few years ago by the fact that a student had admitted a phony transcript. It turned out that they actually had a little over a two-point grade average at a community college before the student entered Yale. At the time it was discovered, the student had over a three point at Yale.

My own university where I went to undergraduate school, the grade average that would put you in the top 10 percent of your class now puts you in the middle of your class, the same grade average. At the university I headed, I found that in one of our departments in education, the average grade was a three point six. Apparently it had quite outstanding students.

The simple fact is this needs to be part of any accreditation; that is, to see if the grading system accurately measures performance and does provide some difference between a student that is good and a student that is outstanding. If one doesn't provide that differentiation with the grading system, grades become less than meaningful. Also, I don't think that then one provides the incentive for excellence and the reward for excellence and hard work that we would expect our institutions to do. I think it is a matter of making sure it is included in the criterion that is looked at for accreditation.

**Mr. Goodlatte**. Dr. Eaton, is it?

**Dr. Eaton**. I think a number of the standards of both the institutional and programmatic accreditors do include attention to student achievement and the terms and conditions under which grades are earned. Accrediting organizations do not stipulate what a grade distribution ought to be, nor what should, in my view, an accrediting organization attempt to dictate to a faculty member how he or she might go about determining the extent to which a student has learned in an individual classroom.

**Mr. Goodlatte**. But short of doing that, how do you impose some kind of a standard that would bring us back away from having 91 percent of the students graduating with honors? What is to distinguish them from amongst themselves if that is the case?

**Dr. Eaton**. My sense, Congressman, is that this is an issue that is much, much broader than imposing standards or accreditation. It has to do with the extent to which colleges and universities are taking a hard look at the demands that they are making on students, the expectations they have of students to obtain some kind of credential or degree. I can see accrediting organizations raising these issues and working with colleges and universities and programs to say, that the colleges and universities need to be more rigorous or more demanding, if indeed that is required. There is a lot of debate out there about the extent of grade inflation, and in a number of places there is debate on

whether one can make the case that it exists or not. There are pros and cons in the research on that issue.

But nonetheless, an effort to enhance the rigor across the board in higher education institutions and programs can be undertaken. Accreditation can be part of that endeavor and part of a movement toward increased rigor, but it is not only a matter of accreditation. And I for one would have a great deal of concern about efforts to standardize across all types of institutions and programs.

**Mr. Goodlatte**. My time is running out. I noted, Dr. Rose, in your testimony that one of the specific objectives of the accreditation review project was to increase attention to student learning outcomes and institutional improvement. I wonder if you have any specific ideas or suggestions with regard to how, for example, you measure that.

**Dr. Rose**. Well, I think that is exactly where this issue will be addressed. When comparable information about a student's success is available to us beyond just the grades that individuals attained in classes, we assess their performance. At my own institution, we have a number of academic performance measures that are applied to our students. It will ultimately be difficult for a faculty member to explain the performance of a student in his or her class if that performance isn't paralleled in the results of student learning in the assessment tests that our students take as part of their general education requirements and then in their major.

That kind of conflict will become obvious to other faculties, and I think that pressure in itself will hopefully drive us back to a representative system that demonstrates variation among our students.

**Mr. Goodlatte**. Thank you, Mr. Chairman.

**Chairman McKeon**. Thank you.

**Mr. Ehlers**.

**Mr. Ehlers**. Thank you, Mr. Chairman.

First, I will put my two bits in about grade inflation. I am appalled at it, and I appreciate your perspective, Senator Brown. I feel exactly the same way. I taught at higher educational institutions for 22 years and could see the trend beginning when I was there. It has gotten considerably worse since then. Let me also observe, I see it from the other end now as I interview individuals for positions or for recommendations. Within the past 2 weeks I had one student say she had a 3.9, another that her GPA was about 3.6, and I found that I really didn't know what that meant. I don't know how to factor that in. I find at that point you almost have to resort to something universal, such as saying what was your ACT or SAT score when you started. But that is not a good measure, either.

Let me make a suggestion, and I, incidentally, disagree with you, Dr. Eaton. I think there are ways that the accreditation process can measure this by comparing to the professional exam

grades and looking at that compared to where institution X, the one you are visiting, stands in those and how that compares to their grade average that they are giving out.

Another point that has been raised here by Congressman Petri is the measurement of outputs, and I am very nervous about measuring outputs in terms of grades because I think they become somewhat meaningless. It might make sense to have students to take the ACT or SAT afterwards and compare it to their pre-college administration and use the difference as a measure of how well the institution has done rather than a final result. Because obviously Harvard has very high admissions scores and SAT and ACT; other schools may not, but the other, the smaller institution or the liberal arts college that Dr. Cook referred to may actually have done a much better job with their students in bringing them up from where they were to what they have become.

But I really think the grade inflation is a major problem, and I call it the Lake Woebegone effect, because everyone today has to be above average. It is not just in college, it is in elementary schools and high schools as well. Fifty years ago, if you got a low grade in elementary school and you came home, you were in trouble with your parents. Today, when you get a low grade in elementary school and come home, the parent marches down to the school and the teacher is in trouble. It is just a different attitude. We have to recognize that average does mean average. It is the mean. You have to have the same number of below average as above average.

I would appreciate any comments or reaction to my statements. Dr. Eaton.

**Dr. Eaton**. I think we are talking about two things here, sir. One is, how many of a certain type of grade are you giving. That is the Harvard example. And that is what to me people generally mean when they refer to grade inflation. And then second, what did it take to earn that grade? Which I think is perhaps the even more critical question. That is, if that person with whom you had the interview had this very high average but there weren't adequate demands or expectations placed on that person to achieve the kinds of competencies you were expecting for employment, how do we deal with that issue? I think we have seen a good deal of that. I am an employer, too. I have seen it. How do we combat that issue? What I am suggesting is that, A, accreditation is part of the solution but certainly not the whole solution. B, I am raising significant questions about whether standardizing grading across institutions is a solution or not. I have very, very serious reservations about the effectiveness of that.

**Mr. Ehlers**. I am not suggesting that. I very carefully avoided that. I said we have to have some means of comparison. So if on the professional engineering, for example, institution A students get very high scores in the professional engineering exam, and in institution B they get lower, and yet institution B students had higher grades, you know there is something wrong with the grading system at institution B, or at least you know there is a relative problem there.

I am just saying it is a problem that has to be addressed. It has become a runaway problem. You cannot have meaningless grades. I recognize full well the differentiation. I taught physics. I happen to be a physicist. In the physics major classes my grades were very high because these were very high performing students. They were tackling very, very difficult topics and doing well on them. But I would also give low grades to those who didn't perform well. But when I taught non-majors in the lower division courses, my grade distribution was more in tune with what I

thought the college as a whole should be, because I was dealing with students from all areas of the college.

Are there any other comments? Let the record show that Senator Brown is nodding. Hesitantly, but he is still nodding. I yield back, Mr. Chairman.

**Chairman McKeon**. I understand, Dr. Palmer Noone, you may need to leave to catch a plane.

**Dr. Noone**. Yes, sir.

**Chairman McKeon**. When you need to leave, leave, unless we have lost the plane already.

**Dr. Noone**. Thank you.

**Chairman McKeon**. Thank you.

You know, in listening to this discussion and the grade inflation, it reminds me that in L.A. County (where I am from) they have begun grading restaurants for their cleanliness. I go to a lot of restaurants, all the fast food, all of them, and they all have an "A." I don't know what the criteria are, you know. I doubt that they are all of the same cleanliness level. Maybe there is a very low standard to get an "A." I don't know. I did see one place once that was a "B." But I have gotten to the point where, kind of like Dr. Ehlers, I kind of wonder what grades mean anymore.

**Mr. Wu**.

**Mr. Wu**. Thank you, Mr. Chairman. I think that I need to improve the circles in which I travel, because in my travels I have come across restaurants with A, B, and C ratings, and this is of deep concern.

I will be brief. I understand that there has been some discussion of whether accreditation is necessary as a precondition for student financial aid. I understand there is some divergence of opinion on that. And I guess I just wanted to put out for inquiry and discussion whether the accreditation process is of some help in, shall we say, quality control and eliminating some of the problems that we may have had in the past with certain institutions and receiving financial aid.

Dr. Eaton, perhaps we could start with you.

**Dr. Eaton**. Thank you. I think the evidence is clear that accreditation has been helpful in that regard. That is not to say that every institution in the country that is accredited meets every exacting standard anyone might have. It is to say that you can reasonably rely on an institution if indeed it is accredited. We know that we had a major issue 10, 12 years ago with regard to fraud and abuse. We know that. We strengthened the accreditation procedures. We strengthened, as was indicated earlier, some of the law and regulation with regard to student financial aid. It took both things. It took a strengthening of accreditation that did occur as well as the changes in the law with regard to fiscal and administrative issues to bring about that reduction in default rates.

So I would say, sir, that indeed it is effective. We can talk about ways in which we might want to make it even more effective in the future. But the absence of any screen at all I think would be decidedly problematic.

**Senator Brown**. Congressman, I would have a slightly different view. It does appear to me, if you look at the record, that indeed accreditation has been helpful in spotting institutions that are in financial trouble. There it has indeed identified institutions. While there have been very few that have been denied accreditation, it does help in that area. My belief is that it has not been effective in terms of offsetting standards on academic quality. Is it of some help? I think that is quite true. I think accreditation is going to exist whether or not you make it a condition of getting federal student assistance or not.

I think accreditation has a value and it will continue to have a value and will continue to exist. But I would separate it in your thinking from whether or not what standards you set allow students to get financial aid. My hope is you would, in thinking about financial aid, set standards you are comfortable with in regard to quality that are not now being identified by the current accreditation system. That can be done by ensuring additional entities are involved in accreditation, and it can be done by empowering states or making it clear that states can move forward in this area to ensure that the minimum quality is there. It can be done by toughening up the standards that you set for accreditation. It can also be done by the allowing the marketplace to set the standards.

Obviously, one of the things that happens here is that it is not just federal money that goes to support the institutions, it is students' money as well.

So it can be done by a variety of things, but at least in my mind the serious questions involving the declining curriculum demands and declining grading standards are not being met by the current system.

**Mr. Wu**. Are there any other comments?

Let me just follow up, Senator Brown. If your view is that the marketplace should be an important mechanism here, isn't the availability of Federal financial aid in essence a marketplace factor if accreditation is necessary for the availability of Federal financial aid? I mean, that is an incentive-based system. Do you agree with that?

**Senator Brown**. Sure, it is an incentive, and I am going to say I think it is reasonable for the Federal Government to look to standards. I don't think you want to abandon any check here in terms of monitoring where federal money goes. But I think it is unrealistic to assume that we are really doing a good job of valuing academic quality with the current system.

**Mr. Wu**. Thank you very much, Mr. Chairman.

**Mr. Ehlers**. Mr. Chairman, I wonder if you could just yield a few seconds.

**Chairman McKeon**. Mr. Ehlers, please.

**Mr. Ehlers**. I just wanted to add one additional comment on this issue, something I think would be legitimate for the accrediting agencies to do, and that is to require institutions to do surveys of their graduates. I know at the one institution I taught at, a very good liberal arts college, one of the highest ranked in U.S. News and World Report, a number of the departments did that every year, surveyed employers of their graduates over the past 5 years to see what their responses were about what the institution had done right, and had not done right. Information of that sort I think would be very useful to the accrediting teams as they come in.

**Chairman McKeon**. Thank you very much, and I understand Mr. Hinojosa has some other questions.

**Mr. Hinojosa**. Mr. Chairman, if I could submit my questions in writing to save some time.

RESPONSES TO QUESTIONS SUBMITTED FOR THE RECORD BY REPRESENTATIVE RUBEN HINOJOSA, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C. – APPENDIX I

**Chairman McKeon**. I appreciate that. Any other members who weren't able to make it here today, we will keep the record open. We would appreciate, if you hear from those questions from other members, if you could answer for the record. As we move forward on this, there will be I am sure more discussion on this area. It is a very important issue that we will be looking into as we go through the reauthorization process.

Thank you again for being here. I would encourage you to stay involved. As we go through the reauthorization process we could use your help and expertise. Thank you very much.

If there is no further business then, the subcommittee stands adjourned.

[Whereupon, at 4:05 p.m., the subcommittee was adjourned.]

***APPENDIX A -- WRITTEN OPENING STATEMENT OF CHAIRMAN HOWARD P. "BUCK" MCKEON, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.***

**Opening Statement of Howard P. "Buck" McKeon**
**Chairman**
**Subcommittee on 21st Century Competitiveness**

**Hearing on "Assuring Quality and Accountability in Postsecondary Education: Assessing the Role of Accreditation"**

**Tuesday, October 1, 2002**

Good Afternoon:

I want to welcome our witnesses here today and thank them each for appearing here today to share their insight and knowledge about the accreditation process.

Next year, this Committee will begin the process of reauthorizing the Higher Education Act, where our main focus will center on examining federal policy that provides access to a high quality and affordable college education. In an effort to begin that process, we are holding this and other hearings to begin reviewing topics that may be addressed during reauthorization.

Since my time on the Committee, I have always believed that there is nothing more important than the education of our citizens and it is the responsibility of this Congress to afford the opportunity for all Americans to get a quality education. While we can not control which school a student chooses to attend, we can certainly work to provide some level of confidence that the institution they do attend will live up to its obligation to provide an education that adheres to some kind of standard. Most consumers look to accreditors to provide such confidence.

If the school and its programs are accredited, the assumption by most is that it provides a quality education.

The purpose of this hearing is to determine if that assumption is accurate.

Over the last few months, there has been a good deal of conversation about quality education and holding institutions accountable for the education they provide. As a member that is interested in exploring ways to open the doors of opportunity for all Americans through access to a quality postsecondary education, I believe that we should thoroughly examine the accreditation process.

As most know, while there are standards now in the Higher Education Act, there is also a provision that allows for expansion of standards as deemed appropriate by the accrediting agencies. In that vain, I am extremely concerned that accreditation agencies are imposing standards on institutions that have little or nothing to do with academic quality.

It is my hope that, through this hearing as well as others held next year, we will address this concern and learn in great detail the answers to the following questions.

- ✓ Does the fact that an institution gains accreditation mean that it is a quality institution?
- ✓ Is there more that accreditors can do to ensure that the education provided by a postsecondary institution is in fact quality?
- ✓ Should there be more independence within the accreditation process rather than continue what is now more of a peer review process?
- ✓ Should Congress do more to require specific standards for accreditors and the areas they review?

I am eager to hear from all of you today so that we here on the committee can better understand the accrediting process, how regional and national accreditors interact, as well as their roles and responsibilities. We also need to hear what standards are imposed on institutions and how to make sure students and their families have a clear understanding of what accreditation means to them as consumers.

Again, thank you for being here today.

## *APPENDIX B -- WRITTEN OPENING STATEMENT OF REPRESENTATIVE JOHN F. TIERNEY, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.*

**John F. Tierney Statement**
**21st Century Competitiveness Subcommittee**
**Hearing on Assuring Quality and Accountability in Postsecondary Education: Assessing the Role of Accreditation**
**October 1, 2002**

Thank you Mr. Chairman. As we begin, I would like to honor the woman who served with distinction as the ranking Democrat on this Subcommittee, Patsy Mink. I offer my condolences to the Mink family, especially her husband John and daughter Wendy, and to the people of her district who have lost a leader and a friend. From age 4 when she insisted on joining her brother at school to her service as the first Asian-American woman to practice law in Hawaii, and to her election as the first woman of color to Congress, Patsy broke down barriers -- first for herself, and then for others. Patsy left a legacy for millions of working families she helped lift out of poverty with education and job training programs ranging from the War on Poverty to Welfare Reform, and the generation of female student athletes for whom she drafted, passed and implemented Title IX, the 30 year anniversary of which we just commemorated this June. Patsy provided vision, courage and leadership - speaking out on all the vital issues of the day and inspiring us, her colleagues, with her fiery oratory on the House Floor and policy negotiations that combined her mastery of education and labor issues with the persuasive power of Hawaiian chocolate-covered macadamia nuts.

Mr. Chairman, I know my colleagues and the committee staff join me in mourning the loss of a valued friend and colleague whose distinguished service to the House and to this Committee made a difference in the lives of millions of Americans. We will miss her dearly.

I would like to welcome our witnesses- I am looking forward to hearing about the role of accreditation in our post-secondary institutions in the 21st Century. As our committee turns to the reauthorization of the Higher Education Act next year, your input will provide invaluable information as we address higher education in a new context that challenges our colleges and universities to meet the need for a highly skilled workforce. Again, I look forward to hearing their remarks.

Before I begin my statement I would to express my appreciation to Dr. Charles Cook for coming to testify before the subcommittee today.

Dr. Cook is the Director of the Commission on Institutions of Higher Education for the New England Association of Schools and Colleges in Bedford, Massachusetts, which I am proud to claim as part of my district. Thank you Dr. Cook.

Accreditation plays an important role as it ensures that our postsecondary institutions provide students with quality education. While the Department of Education has oversight over accreditation, non-governmental private education associations develop criteria and conduct peer evaluations of institutions to determine whether or not standards for accreditation are met. Although the Department of Education publishes a

list of nationally recognized accrediting agencies, there is considerable latitude in the accreditation process. Accreditation also plays a significant role in financial aid, as federal financial assistance is limited to institutions that are accredited by agencies recognized by the Department of Education.

As we begin to address the role of accreditation in higher education, much has changed since Congress last reauthorized the Higher Education Act in 1998-
Distance learning will not doubt be an issue of considerable debate. Congress authorized a "Web-based Education Commission" in the 1998 Reauthorization of the Higher Education Act." I have concerns about rushing to make decisions before we carefully examine the results of the commission.

I know that some disagree, as they supported HR 1992, "The Internet Equity and Education Act" last fall. I think we will have much to examine and discuss regarding accreditation and distance learning in the 108th Congress.

I have concerns about the lack of transferability of credits for our students who may begin courses at one college and then transfer to another four-year college. I am also interested knowing how the curriculums of post-secondary institutions will keep pace with changes in our culture and society.

Overall, we need to carefully consider the accreditation process because we are ultimately shaping the education and training that our students receive as they enter the workforce.

Again, I would like to thank the witnesses for coming before the subcommittee today; I look forward to their testimony.

***APPENDIX C -- WRITTEN OPENING STATEMENT OF REPRESENTATIVE THOMAS E. PETRI, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.***

**Opening Statement**
**Hon. Thomas E. Petri**
**Assuring Quality and Accountability in Postsecondary Education: Assessing the Role of Accreditation**
**Hearing Before the Subcommittee on 21st Century Competitiveness**
**October 1, 2002**

Accreditation is almost never mentioned in today's discussions over the escalating costs of higher education, declining academic standards, and accountability. But closer examination of the accreditation system reveals that it does little to address these problems and, in some ways, contributes to them.

The costs of higher education continue to increase faster than inflation, and the federal government's contribution of student aid increases in tandem. We rely on the system of accreditation to ensure that a school provides a quality education and is therefore eligible for these federal dollars. But what does accreditation really say about a school?

Unfortunately, accreditation these days has little to do with academic rigor or educational outcomes; rather, it serves only to show that a school has the right set of inputs. For example, an accrediting agency may place an emphasis on schools having a certain number of professors with terminal degrees in their field, yet the question is never asked whether students in classes taught by these professors are actually learning anything. I'd like to point out that this focus on inputs over outcome is exactly the same criticism shaping reforms being discussed for federal special education policies. Congress has imposed on schools mandates that we assume will provide the intended educational outcome, but then we never ask if that outcome has been achieved.

While this focus on inputs fails to guarantee academic quality, it also unnecessarily drives up the costs of higher education. As part of the accreditation process, schools must pay dues to their accrediting association and conduct extensive "self-studies" that require a great deal of time and money and produce information of questionable value. Furthermore, accreditors may make recommendations that pressure schools to reallocate scarce resources in a manner that may not suit the overall needs of the school or may not be the most effective use of those resources. Or even worse: an accreditor may pressure a school to pursue policies at odds with its individual mission.

The accreditation process has strayed from the purpose Congress originally intended, but it can be changed to provide students and parents with real information about the quality of education a particular school provides. Yesterday, I introduced H.R. 5501, the Higher Education Accrediting Agency Responsibility Act. This legislation eliminates the requirement that schools be accredited in order to receive federal student aid funds. It will help to open the accreditation process to competition, which will encourage accreditors to evaluate results rather than inputs and provide prospective

students and parents with meaningful information about a school. Under a voluntary system, colleges and universities that seek accreditation will demand from an accreditor quality advice and recommendations that improve the education offered to their students.

I am sure that this hearing will help provide us with a better understanding of the accreditation system and how we can bring about these needed improvements.

***APPENDIX D -- WRITTEN STATEMENT OF DR. JUDITH S. EATON, PRESIDENT, COUNCIL FOR HIGHER EDUCATION ACCREDITATION, WASHINGTON, D.C.***

TESTIMONY OF

DR. JUDITH S. EATON

PRESIDENT

COUNCIL FOR HIGHER EDUCATION ACCREDITATION

BEFORE THE

COMMITTEE ON EDUCATION AND THE WORKFORCE
U.S. HOUSE OF REPRESENTATIVES

SUBCOMMITTEE ON
21ST CENTURY COMPETITIVENESS

OCTOBER 1, 2002

IN REGARD TO:

"ASSURING QUALITY AND ACCOUNTABILITY IN POSTSECONDARY EDUCATION: ASSESSING THE ROLE OF ACCREDITATION"

Mr. Chairman and Members of the Committee:

Thank you for the opportunity to be here today to discuss the vital role that accreditation plays in assuring quality at our nation's postsecondary institutions and programs. I am Judith S. Eaton, President of the Council for Higher Education Accreditation (CHEA). CHEA is a private, nonprofit national policy organization that coordinates accreditation activity in the United States. CHEA is an institutional membership organization that represents approximately 3,000 degree-granting colleges and universities and 60 national, regional, and specialized accrediting organizations.

**OVERVIEW AND HISTORY**

Accreditation is a process of external peer review of the quality of higher education institutions and programs. More than 100 years old, accreditation is also a response to concerns about protecting public health and safety and serving the public interest.

The federal government has relied on non-governmental accreditation for the past 50 years for decisions about eligibility of higher education institutions to receive federal student financial assistance and other federal funds. The federal recognition process was initiated in 1952, shortly after passage of the GI Bill for Korean War veterans. The government sought some screening for higher education quality to be linked to the federal student financial assistance program. Rather than create a quality assurance system of its own, the government chose to rely on accreditation. A recognition process was established in the Office of the U.S. Commissioner of Education to oversee the accreditation enterprise and to produce a list of federally recognized accrediting organizations. The standards used in the recognition process were put into law in 1992.

The accreditation-federal government relationship has two key elements. Accrediting organizations, institutions, and programs carry out their primary responsibility to assure and improve academic quality in higher education. The federal government assists taxpayers and

recipients of student aid funds by allowing student grants and loans to be used only for attendance at accredited institutions and programs.

The accreditation-federal government relationship is an extraordinary example of a successful public-private partnership. Working together, private accrediting organizations and federal officials have, during these 50 years, sustained a rigorous, reliable, and effective means to provide broad access to higher education at a level of quality that has produced what is frequently called "...the best higher education system in the world." Accreditation of institutions and programs is the single most comprehensive means by which the country both assures and improves the quality of higher education. While the details of the accreditation process are not widely known, the public and policymakers do know that "being accredited" is among this country's most important signals of the quality of higher education. Moreover, the powerful federal commitment to access is sustained and enhanced by government reliance on the judgments of accreditors about academic quality.

**Types of Accreditation**

U.S. accreditation is an extensive enterprise. In 2001, 80 accrediting organizations accredited approximately 6,300 institutions and 17,500 programs throughout the country and abroad. U.S. accreditation is decentralized and complex, mirroring the decentralization and complexity of American higher education itself.

There are three types of accrediting organizations:

- *Regional accrediting organizations* operate in six different regions of the country and review entire institutions, 98% or more of which are both degree granting and nonprofit. Regional organizations may also accredit degree or non-degree for-profit institutions.

- *National accrediting organizations* operate throughout the country and review entire institutions. Of the nationally accredited institutions, 34.8% are degree granting and 65.1% are non-degree-granting. 20.4% are non-profit and 79.5% are for-profit. Many are single purpose institutions focused on a specific mission such as education in information technology or business. Some are faith based.

- *Specialized accrediting organizations* also operate throughout the country and review programs and some single-purpose institutions. These organizations work closely with the various states on matters of licensure of individuals in different fields and professions.

The five key features of accreditation are:

- **Self-study:** Institutions and programs prepare a written summary of their performance based on the standards of an accrediting organization.

- **Peer review:** Faculty and administrative peers carry out two essential tasks of accreditation. Peers test the veracity of the self-study, primarily by serving on visiting teams to institutions and programs. Peers make up the majority of members of the decision-making commissions created by accrediting organizations to determine accredited status, joined by public members of these bodies (non-academics who have an interest in higher education).

- **Site visits:** Accrediting organizations normally send a visiting team to review the sites of institutions or programs. As indicated above, the self-study provides the foundation for the team visit. These teams of peers and public members are volunteers and are generally not compensated.

- **Action (judgment) by accrediting organization:** Accrediting organizations have commissions that take action to affirm accreditation for new institutions and programs, reaffirm accreditation for ongoing institutions and programs, or deny accreditation to institutions and programs.

- **Ongoing external review:** Institutions and programs continue to be reviewed over time on cycles that range from every few years to ten years. They normally prepare a self-study and undergo a site visit each time.

## CHALLENGES FOR ACCREDITATION

In the current climate, the accreditation enterprise faces a range of challenges driven by expansion of access, application of new technologies and the increasing importance of higher

education to economic and social mobility in the society. These challenges affect federal policymakers as well. Of the many challenges affecting both the accrediting community and federal policymakers, I will briefly address three that must receive our most careful attention and judgment at this time:

- Accountability and further development of evidence of student learning outcomes;
- Providing additional information to the public about accredited status and the quality of institutions and programs; and
- Assuring quality in distance learning.

**Accountability and Further Development of Evidence of Student Learning Outcomes**

Evidence of student learning outcomes has emerged as an increasingly important dimension of accreditation review. The higher education community, policymakers, students, and governments are seeking additional information about what a student achieves as part of the consideration of the quality of accredited institutions and programs. There is a growing need for accrediting organizations to work with institutions and programs to further augment the information they currently provide about their resources and processes with (1) information about what students know and can do as a result of their education and (2) how that information should be used to make judgments about institutional and programmatic quality.

To assist accrediting organizations in this important work of developing and using evidence of student learning outcomes, CHEA has held a series of workshops across the country to bring accrediting organizations together to further develop capacity to use evidence of student learning outcomes in accreditation decision-making. This capacity building is taking place in an environment that acknowledges the variation of types of institutions and programs that undertake accreditation. Accrediting organizations, institutions, and programs can and should vary considerably in the manner in which they address student learning outcomes. A liberal arts student cannot be expected to demonstrate the same learning outcomes as a dental hygienist. At the same time, certain fundamentals should prevail. These are commitment to the importance of evidence of student achievement, the responsibility of accreditors, institutions, and programs to routinely address student learning outcomes, and assuring that student learning outcomes play a significant role in judgments about quality and accredited status.

**Providing Additional Information to the Public about Accredited Status and the Quality of Institutions and Programs**

The challenge to accreditation here is to provide better and expanded information to the public and policymakers about quality and accredited status. Accredited status is a signal to students and the public that institutions and programs meet at least minimal standards for, e.g., faculty, curriculum, student services, and libraries. Accredited status is also a signal that institutions and programs provide evidence of fiscal stability.

"Better and expanded information" means that accrediting organizations, institutions and programs can work together to craft additional profiles of institution and program performance based on such readily available information as graduation rates, retention, student mobility through transfer and entrance to graduate school. In order to make an informed judgment about performance, the public and policymakers also need information about the level of selectivity or admissions policy of an institution or program, the type of institution or program (e.g., a single-purpose computer technology college or a comprehensive university; a community college or a research university), and the expectations the institution has established for student success.

There is a delicate balance to be maintained between working with institutions and programs to meet accreditation standards and to provide needed information at an appropriate time to the public. Accreditors, institutions, and programs need to protect the private, confidential nature of accreditation review. At the same time, these groups need to be developing additional means by which the public has fuller information about accredited status and quality.

**Assuring Quality in Distance Learning**

Today, "distance learning" refers to any educational or instructional activity in which students are separated from faculty and other students. This may include synchronous or asynchronous learning environments with a variety of instructional modes, for example, audio or computer conferencing, computer-mediated instruction, Internet-based instruction, videocassettes or disks, or television.

The responsibility - and challenge - of the accrediting community is to assure quality in the diverse distance learning environment, especially as federal policymakers consider decisions to loosen the restrictions in the law governing distance learning as it relates to access to student aid

such as the 50% rules, the 12-hour rule and whether federal student aid should be available on the same terms and conditions as site-based education.

The accrediting community has moved thoughtfully and comprehensively to assure quality in distance learning. Accrediting organizations examine and make judgments about the fundamental features of the operation of any institution or program engaged in distance learning. These features are institutional mission, organization, resources, curriculum and instruction, faculty support, student support, and student learning outcomes. In some cases, accreditation undertakes this examination based on new standards and processes that have been developed specifically to assure the quality of distance learning. In other cases, accrediting organizations have modified existing standards or processes to achieve the same goal. Through these changes, accrediting organizations assure the quality of alternative designs of instruction, alternative providers, and the expanded focus on training.

The 17 institutional accrediting organizations that review institutions offering distance learning programs or courses actively apply these standards or guidelines in their reviews. Where appropriate, standards have been modified and practices expanded to address the unique features of distance learning. The accreditation experience to date to assure quality in distance learning leads us to urge that policymakers focus not on the mode of delivery for higher education (e.g., whether distance-based or site-based), but on whether appropriate standards have been developed and used to assure quality in distance learning as well as other forms of delivery.

**PREPARATION FOR REAUTHORIZATION**

As the Congress, the accrediting community and higher education community prepare for the upcoming reauthorization of the 1965 Higher Education Act, it is important to keep in mind the critical service that accreditation provides and the unique nature of its partnership with the federal government. It is the hope and goal of higher education and the accrediting community that this vital partnership remains central to the work of the federal government.

We believe that reliance on the private, peer review process of accreditation to determine academic quality is essential to honor the statutory language that holds educational institutions, not government, responsible for their educational enterprise. CHEA, accreditors and members of the higher education community would be greatly concerned if efforts were made to expand the

federal role into areas of academic quality that have traditionally been the responsibility of educators. Speaking from more than 20 years experience as a community college president and state chancellor, I believe that it would not serve students, institutions, or programs well for the federal government to make judgments about what constitutes a quality environment at a college or university.

CHEA is currently consulting with its colleagues in the accrediting community and higher education to prepare for the upcoming reauthorization. The distinguished CHEA Board of Directors has established a Task Force on Reauthorization to develop and oversee a CHEA agenda of issues vital to accreditation and higher education. As the earlier discussion of challenges indicates, there is much that accreditation and the government need to do together to sustain and enhance the access and quality that are the distinguishing features of higher education in our country.

**SUMMARY**

Accreditation is a bold and complex enterprise that has served the federal interest and the public extremely well for the past 50 years. Accrediting organizations are accountable to the institutions and programs they accredit. They are accountable to the public and government who have invested heavily in higher education and expect quality.

Three of the major challenges facing accreditation are developing additional evidence of student learning outcomes, expanding public information about quality and accredited status and assuring quality in distance learning. While these are issues of significant magnitude, this is not the first time that the accrediting community has called upon its resourcefulness and commitment to meet challenges of such consequence. For example, in the last 50 years, both higher education enrollments and the numbers of institutions have expanded dramatically and the types of institutions diversified. Higher education sustained an enormous growth of part-time non-degree students, developed extensive international programming, and created diverse partnership and consortia arrangements. In these instances, as higher education changed, so to, accreditation changed to continue to assure the quality of the education provided.

As we prepare for the upcoming reauthorization of the Higher Education Act, the accrediting community will respond vigorously and effectively to the current challenges of assuring quality.

Thank you for the opportunity to share my views with you today. I am pleased to answer any questions you may have.

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October 10, 2002

The Honorable George Miller
Ranking Member, Committee on Education and the Workforce
U.S. House of Representatives
Washington D.C.

Dear Congressman Miller:

Thank you for the opportunity to provide additional comments for the record of the Subcommittee on 21st Century Competitiveness October 1 hearing, *"Assuring Quality and Accountability in Postsecondary Education: Assessing the Role of Accreditation."* Specifically, you requested that the Council for Higher Education Accreditation (CHEA) share its views on the recent report released by the American Council on Trustees and Alumni (ACTA), *Can College Accreditation Live up to Its Promise?*

While the report raises some valid issues with respect to accreditation, we believe that it contains a number of claims about higher education and against accreditation that, historically, have been the subject of much difference of opinion and debate. The report bases a number of findings on accreditation standards that are out of date, limiting an accurate portrayal of accreditation as it operates today. The report also recommends severing the tie between accreditation and access to federal student financial assistance, Title IV, but does not develop a meaningful alternative.

As I stated in my written testimony, accreditation is a public-private partnership that has served the federal government and the public extremely well for the last 50 years. Accreditation is not without its challenges. But, we would caution members and other policy makers to carefully consider the repercussions of casting aside a vast, voluntary enterprise that works diligently to serve the public good at a miniscule cost to the government or the taxpayers.

I have enclosed a paper, *Absent Accreditation...Where Would We Be?* for the hearing record that more fully addresses our concerns with the ACTA report.

Thank you again for requesting our views.

Sincerely

Judith S. Eaton
President

COUNCIL FOR HIGHER EDUCATION ACCREDITATION
16th Anniversary

Enclosure

# ABSENT ACCREDITATION...WHERE WOULD WE BE?

DR. JUDITH S. EATON

PRESIDENT

COUNCIL FOR HIGHER EDUCATION ACCREDITATION

OCTOBER 10, 2002

Accreditation of higher education is a process of private self-regulation in which colleges and universities undertake self-evaluation and peer review to assure and improve academic quality. A mature and extensive enterprise that is more than 100 years old, the 80 nonprofit, institutional and programmatic accrediting organizations, in 2001, accredited approximately 6,300 institutions and 17,500 programs.

Not confined to providing benefit to higher education alone, accreditation has become a mainstay of reliable judgment of academic quality for millions of students, federal and state governments, thousands of employers and the general public. These large and diverse constituencies depend heavily on the judgments of the accrediting community when making critical financial, social and policy decisions in their personal lives, their businesses and, in the case of government, when determining public policy.

Students rely on accreditation when selecting a college or university and paying the attendant tuition charges. Federal and state governments rely on accreditation when providing taxpayer dollars to support grants and loans to students as well as to support public institutions of higher education. Employers rely on accreditation when making decisions to support the continuing education of employees and investment in research. The general public relies on accreditation to obtain credible information about the effectiveness of higher education.

As we approach reauthorization of the 1965 Higher Education Act (with its provisions for federal oversight of accreditation), the large and complex accreditation enterprise is once again a target of criticism and, even at this early stage, argument. Some would go so far as urging the elimination of accreditation or at least severely curtailing its role as the country's primary means of assuring and improving quality in higher education.

The recent report, *Can College Accreditation Live Up to Its Promise?*, released by the American Council of Trustees and Alumni and a bill (HR 5501) introduced by Congressman Thomas E. Petri (R-WI) both go this far. The report calls for an end to the requirement that institutions and programs be accredited in order that they are eligible for federal student aid and other federal funds. The proposed legislation would make this so. At the same time, neither the report nor the bill provide for any meaningful alternative to accreditation as we know it.

Why take this drastic step? Because, the report claims, accreditation is not equal to the task of providing needed information about quality to the government. And, in a political environment saturated by Enron and Arthur Andersen, the report reflects skepticism about the integrity of any system of self-regulation, including accreditation.

The report makes a number of claims against accreditation about which there would be significant difference of opinion and debate. Accreditation, the report claims, fails to provide enough information to the public about higher education performance (how well colleges and universities teach) and student learning outcomes (what students learn). The report holds accreditation at least in part responsible for what it considers to be several decades of diminution of quality, exacerbated by an over-valuing of what is really mediocre performance of some students. Even more questionable, the report contends that if accreditation were successful, the public would see improvement in graduation rates and retention rates.

Yes, reasonable people may differ on the appropriateness of the role that accreditation plays in relation to government. Yes, the value of accreditation as a form of self-regulation can be viewed quite differently by the same reasonable people. Yes, accreditation can do more to provide information to the public about how institutions perform and what students learn. Many accreditors have taken steps in these directions during the past several years.

Let's acknowledge that accreditation, as with any other social institution, is not perfect and can improve in matters essential to its central purpose - academic quality. Working with faculty, administrators and trustees, accreditation is and should be part of ongoing efforts throughout all of higher education to improve quality. Many of the issues raised in the report are not new and have been put forward by accreditors themselves as part of their ongoing self-scrutiny.

Let's pause, however. It does not make sense to eliminate or even curtail the role of accreditation without thorough examination of the significant repercussions of these actions and without a clear sense of what would replace accreditation going forward. Accreditation has to come to play an extensive and important role throughout our society.

*U.S. higher education*, often described as "the envy of the world" and the "best higher education system in the world," relies heavily on this powerful system of self and peer scrutiny to advocate and protect its unique features and its vitality. These unique features include not only private self-regulation through accreditation itself, but also the decentralized nature of higher education and a set of core academic values on which higher education has relied for two centuries or more. These are the core academic values of institutional autonomy, academic freedom, collegial governance, independent intellectual inquiry, general education and education in the liberal arts. Self-regulation, decentralization and core academic values are at the heart of the success of the U.S. higher education enterprise.

Absent the scrutiny of accreditation, by what means would higher education sustain these unique features that assure its vitality?

*Students* find information about accredited status of crucial importance to their decision-making about college attendance. The price of higher education is not insignificant and the value of a higher education degree for economic and social mobility is incontestable. Students must have reliable guidance to make choices about college or university attendance. Accreditation is a fundamental part of this guidance. Students, for example, would be reluctant to attend an unaccredited institution or program. To do so would eliminate their opportunity for federal grants and loans, limit their capacity to transfer and enter graduate school and, ultimately, reduce their career and life opportunities.

Absent accreditation, on what would students rely for threshold judgments about the quality of colleges and universities, student opportunities for mobility and assurance about that tuition money will be well spent?

*The federal government*, for the past 50 years, has relied on accreditation to provide essential information about the academic quality of institutions and programs. Federal law requires that the institutions and programs that students attend using federal student aid dollars have accredited status. Absent reliance on the accrediting community, the federal government lacks any means of assuring the quality of the higher education for which they provide funds to students. These funds, according to the United States Department of Education, now amount to approximately $70 billion per year.

Absent accredited status, how would the federal government determine the appropriate use of funds for student grants and loans?

Similarly, *state governments* are heavily reliant on accreditation. State governments authorize and fund public higher education institutions and license private institutions to operate. While most states do not require accreditation for initial authorization or licensure, they nonetheless want these institutions to

achieve accredited status and, in many states, will not authorize additional funds for e.g., student grant or loans without evidence of accreditation.

Further, state governments are wholly dependent on accreditation when they undertake licensure of individuals in professions ranging from teaching to law to medicine to nursing to social work to psychology. Most states require that individuals who sit for their licensure examinations have graduated from an accredited program.

Absent information about accredited status, how would state governments make decisions to support institutions and license both institutions and individuals?

*Employers* spend billions of dollars each year on tuition assistance for current employees and investment in research at colleges or universities. Often, a fundamental requirement for tuition payment and research grants is that the institution to which the employee goes or at which the research is being conducted must be accredited.

Absent accredited status, how would employers make these determinations to aid employees and invest in research?

*The general public*, primarily through the press, constantly seeks additional information about the quality of higher education. Seventy-five percent of high school graduates now attend some form of postsecondary education within two years of graduation. Education beyond high school is no longer viewed as only desirable for social and economic mobility in the society. It is essential. Higher education has, in many ways, become a fundamental consumer good. In this climate, the public clamors for instant and straightforward information on which to make choices about college and university attendance. "Yes, it is accredited" is a primary indicator of at least minimal quality on which the public can rely. *US News and World Report*, for example, lists only accredited institutions in its annual rankings of colleges and universities.

Absent accredited status, how would the public begin determine public value of higher education?

Absent accreditation, we would need an alternative. We would need a replacement for accreditation that enables the higher education enterprise to sustain its vitality based on core values, to assist students to make threshold decisions about quality, mobility and sound use of tuition dollars, to aid the federal government in appropriate use of taxpayer funds for higher education, to help state governments with key decisions to fund institutions and license professions and, finally, to assist employers in judgments about tuition assistance and investment in higher education research.

*Can* accreditation be replaced? Surely. Would a replacement be successful? This remains to be seen. If, for example, the federal government sought to replace accreditation and assumed primary responsibility for assuring and improving quality in higher education, how could this be carried out in the context of current federal law that prohibits federal control of education? Would the U.S. establish another large bureaucracy that would function as a federal ministry of education? From where would the resources for this bureaucracy become available?

If the states took on the role of accreditation, how would we deal with 50 systems of quality review with, in all likelihood, 50 sets of varying standards and expectations? What would be the implications of 50 systems, for example, when students seek to transfer credits from one system to another or take distance learning courses? And, if either level of government filled the role of accreditation, is there not a reasonable likelihood of a politicization of academic quality of higher education that we have managed to avoid to date?

Accreditation could be replaced with yet another private system of quality review. How would this be configured? If this private system did not emerge from the higher education enterprise, what would be done to assure that thoughtful and informed quality review would be conducted by those experienced and knowledgeable about our country's colleges and universities? Could an alternative private system command the extraordinary cadre of volunteer professionals of teachers and scholars that are central to the effectiveness of current the accreditation system? Who would pay for this system?

*******

Even with its flaws, accreditation, by assuring and improving academic quality, performs essential and diverse services to millions of students, families and the public. Federal and state governments are fundamentally reliant on the judgment of accreditors. Employers, too, need the judgments of accreditation. And, perhaps of greatest significance, the higher education community itself relies on accreditation as its primary means of self-criticism and self-improvement.

Can accreditation improve? Surely. It is all too easy to criticize an enterprise that is at once dedicated to quality and concerned about improvement, eager to serve the public and focused on values. Highly-prized and complex social institutions do improve: it takes insight, enormous effort and time to make this so. It may take even more to eliminate or seriously curtail an enterprise of such significance in a society. Where and how do we wish to invest our strength and energy?

***APPENDIX E -- WRITTEN STATEMENT OF DR. CHARLES M. COOK, DIRECTOR, COMMISSION OF INSTITUTIONS OF HIGHER EDUCATION, NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, BEDFORD, MASSACHUSETTS***

TESTIMONY OF
DR. CHARLES M. COOK
DIRECTOR
COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION
NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES

BEFORE THE

COMMITTEE ON EDUCATION AND THE WORKFORCE
U.S. HOUSE OF REPRESENTATIVES

SUBCOMMITTEE ON
21ST CENTURY COMPETITIVENESS

OCTOBER 1, 2002

IN REGARD TO:

"ASSURING QUALITY AND ACCOUNTABILITY IN POSTSEONDARY EDUCATION:
ASSESSING THE ROLE OF ACCREDITATION."

I am Charles M. Cook, Director of the Commission on Institutions of Higher Education, of the New England Association of Schools and Colleges, one of eight regional entities in the United States which accredit colleges and universities. I appreciate the opportunity to testify before you today describing the nature and work of as well as the challenges facing region accreditation.

The accreditation of institutions of higher education is an American invention. It was created nearly a century ago by colleges and universities themselves as a non-governmental response to the need for a mechanism to identify those institutions of higher learning worthy of attendance. Since its inception, it has been remarkably successful in providing meaningful quality assurance upon which, our citizenry, government at every level, and industry has come to depend. Indeed, accreditation is now an essential for any legitimate institution of higher learning.

As noted, there are eight regional commissions; each accredits those institutions of higher learning within a specific multi-state geographical area or region. All, with varying degrees of connection, are part of a larger association which includes accrediting commissions for the K-12 sector. The higher education commissions limit themselves to degree-granting institutions, and together they accredit approximately 3000 colleges and universities, from community colleges to research universities, or nearly all degree-granting institutions. Regional accreditation is the most sought medallion recognizing institutional quality in American higher education. All of the regional commissions are recognized by the United States Department of Education as reliable authorities in matters of institutional quality and each is also recognized by the Council for Higher Education Accreditation.

By definition, accreditation is a status granted to an educational institution found to meet or exceed stated criteria of educational quality. Regional accreditation applies to the institution as a whole and

extends to wherever it offers instruction, and while it does not guarantee the quality of individual programs or graduates, it does provide reasonable assurance as to the context and quality of the education offered.

If regional accreditation is about quality assurance, it is also about quality improvement. That is, accreditation processes are designed to identify institutional weaknesses and otherwise facilitate and encourage positive institutional change. Furthermore, as an expression of the principle of self-regulation, accredited institutions, quite apart from those processes, are expected to concern themselves with their improvement as an ongoing activity.

Accreditation standards among the eight regional commissions vary in detail. However, in terms of the values they express, their general outline and objectives, they are quite similar. Because the object of attention is the institution as a whole, standards address not only educational programming and those resources which directly support it, but also to other such institutional characteristics as student services, fiscal well-being, administrative capacity, and integrity. Furthermore, they are broadly applicable as demanded by the widely different missions and scope exhibited by American higher education, to say nothing of its variety in terms of programming and means of delivery. Such criteria demonstrably encourage the creative innovation so characteristic of our colleges and universities as they seek to respond to the educational needs of our citizenry.

Regardless of the details found in the standards of each commission, the institution found to meet those standards can be said to:

- Have appropriate purposes;
- Have the resources to accomplish its purposes;
- Be able to demonstrate that it is accomplishing those purposes;
- Give reason that it will continue to accomplish its purposes into the foreseeable future.

If the regionals' criteria are similar, so too are the processes by which the standards are applied. Every institution undergoes a periodic comprehensive evaluation, normally every ten years, with opportunities to monitor institutional developments in the interim. The evaluation process extend typically over two years most of which time is spent by the institution in self-study. That is the institution, though a broadly participatory effort, is asked to assess itself against accreditation standards, identifying what it does well, determine the areas in which improvement is needed, and develop plans to address needed improvements. With the results of this effort in hand, by way of a written report, a team of peers – administrators and faculty from other accredited institutions – undertake an evaluation of the institution, again, applying accreditation criteria. Following their three or four day visit, the team prepares a written report of its findings. This document, together with relevant institutional materials, are considered by the accrediting commission itself, which makes a determination regarding accreditation, and in doing so, typically identifies areas needing the institution's attention. The outline given here, while accurate, does not, convey the searching character of these evaluative processes, nor the complexities or nuances of each institutional assessment. To provide further insight into the work of the commissions, I have appended to my written testimony a list of web sites that includes examples of self-studies and team reports from various institutions as well as relevant communications between the commission I represent and member institutions.

It is worthy of note that the work of regional accreditation is carried out primarily by volunteers; the commissions themselves have only small paid staffs. Commissioners are faculty and administrators elected by the accredited institutions in the region. Every regional commission also includes representation of the public's interest, which at least in New England is highly beneficial. The individuals who carry out the institutional evaluations in most regions receive nothing for their

efforts beyond the satisfaction that comes from voluntary efforts to benefit a larger good and the knowledge that they are helping to preserve a system that serves higher education and the American public well. Across the United States each year, literally thousands are involved in the work of accreditation, again on a voluntary basis.

American higher education has been and continues to be remarkably dynamic particularly in the last quarter century. Not only has there been striking growth both in numbers of institutions and numbers of students attending with their average age creeping up each year, our colleges and universities have been conspicuously creative in responding to the demands for higher education which has become a key to the promise of American life. Innovative programming, off-campus and evening and weekend classes, and more recently electronically mediated instruction are all examples of this. These developments have tested conventional assumptions, raising fresh questions as to the essential nature and content of an educational experience and the resources required to support it. The regional commissions have responded by maintaining high standards while also recognizing that education can be provided effectively in a variety of ways. New methods of evaluation have been developed and the content of accreditation standards have changed over the years. Our response to the emergence of distance education reflects this. We have sought to encourage responsible innovation while maintaining an effective system of accountability.

Over the years too, the focus of emphasis among the regional commissions has shifted as is reflected in the content of accreditation standards and the processes by which they are applied. Increasingly, they give attention to student learning outcomes as an essential indicator of institutional quality, though not exclusively so.

While regional accreditation enjoys the support of its institutional members and, I believe, the public at large, it is not without its critics both within and without the academy. Being a human institution, it is not perfect. Responding to educational innovation may be a case in point. Institutions claim, sometimes credibly so, that the standards lag behind what they see as sound educational initiatives; they wish speedy approval for novel programming. Indeed, accreditors may be from time to time "behind the curve" as they seek to balance their historic responsiveness to change with their no less historic commitment to institutional accountability.

Another challenge has been to meaningful insert a greater emphasis on student learning outcomes into its criteria and processes so as to produce institutional change. Here, I believe, we are somewhat ahead of many of our colleges and universities that have found it more difficult than was once generally assumed to assess in telling and useful ways the outcomes of the educational experiences they provide.

Each of the regional commissions serves a diverse set of institutions. For example, in New England the commission I work for accredits Harvard University as well as the Community College of Vermont, the latter offering two-year programs through an entirely part-time faculty to students at 12 different instructional sites. The challenge here is to preserve a meaningful consistency in terms of quality assurance without standardizing expectations, to fashion evaluative processes that, instead of being burdensome, are substantial and useful to the institution regardless of its mission, size, or state of development. This is an area where we continue to work.

Let me conclude by noting that American higher education is the envy of the world, and with good reason. I wouldn't lay claim to the notion that our system of accreditation is the cause of this. Nonetheless, it is one of the important conditions that has produced this result. It is for that reason,

many countries throughout the world seek to learn from the U.S. accreditation experience and adapt it to their circumstance. We look forward to continue serving our member institutions and the public by providing meaningful quality assurance.

Again, I appreciate the opportunity to testify before you today.

**Accreditation Related Web Sites**

Council on Higher Education Accreditation (CHEA) is the national organization for nearly all accreditors who accredit colleges and universities and their various programs in the United States. Its web site includes links to various accreditors and other related higher education organizations: http://www.chea.org/

The eight regional accrediting commissions accredit the approximately 3000 colleges and universities in the United States:

- Middle States Association of Colleges and Schools/Commission on Higher Education: http://www.msache.org;
- New England Association of Schools and Colleges/Commission on Institutions of Higher Education: http://www.neasc.org/
- New England Association of Schools and Colleges/Commission on Technical and Career Institutions: http://www.neasc.org/
- North Central Association of Colleges and Schools/Higher Learning Commission: http://www.hlcommission.org
- Northwest Association of Schools Colleges and Universities/Commission on Colleges and Universities: http://www.cocnasc.org
- Southern Association of Schools and Colleges/Commission on Colleges: http://www.sacs.org
- Western Association of Schools and Colleges/Accrediting Commission for Senior Colleges and Universities: http://www.wascweb.org/
- Western Association of Schools and Colleges/Accrediting Commission for Community and Junior Colleges: http://www.wascweb.org/.

The Association of Professional and Specialized Accreditors includes most specialized accrediting agencies in the United States. Its web site includes links to each of these agencies, where available: http://www.aspa-usa.org/

A particularly good example of a specialized accrediting agency concerned with quality improvement is the Accrediting Board for Engineering and Technology: http://www.abet.org/criteria.html

Sample institutional self-study reports available on the web:

- Bates College: http://abacus.bates.edu/acad/committees/self-study/
- Brown University: http://www.brown.edu/Administration/Accreditation/
- Central Connecticut State University: http://www.ccsu.ctstateu.edu/planning/neasc/default.htm
- Eastern Connecticut State University: http://www.ecsu.ctstateu.edu/ecsu/neasc/
- Gordon College: http://go.gordon.edu/selfstudy/main.htm
- Greenfield Community College: http://www.gcc.mass.edu/folderpreswel/selfstudy/index.html
- New Hampshire Technical Institute in Concord: http://www.conc.tec.nh.us/accreditation/toc.htm
- Northeastern University: http://www.neu.edu/accreditation/final/
- University of Massachusetts at Amherst: http://www.umass.edu/oapa/selfstudy/
- Wellesley College: http://www.wellesley.edu/Reaccreditation/home.html
- Western New England College: http://www.wnec.edu/html/selfstudy.html
- University of Vermont: http://www.uvm.edu/~provost/accreditation/
- Yale University: http://www.yale.edu/accred/

## *APPENDIX F -- WRITTEN STATEMENT OF DR. LAURA PALMER NOONE, PRESIDENT, UNIVERSITY OF PHOENIX, PHOENIX, ARIZONA*

**TESTIMONY BEFORE**
**THE HOUSE SUBCOMMITTEE ON**
**21ST CENTURY COMPETITIVENESS**
**BY**

**LAURA PALMER NOONE, Ph.D., J.D.**

Good afternoon, Chairman McKeon and distinguished members of the House Subcommittee on 21st Century Competitiveness. It is an honor to have been invited to testify today concerning accreditation.

I am here today as the president of the University of Phoenix. With over 125,000 degree seeking students, the University is the largest private university in the United States, with 38 main campus locations in 25 states, British Columbia, and the Commonwealth of Puerto Rico. Over 45,000 of the University's students are taking degrees fully online, and these students reside in all fifty states as well as forty-five foreign countries. The University is accredited by the Higher Learning Commission of the North Central Association, one of the six regional accrediting bodies in the United States. However, because of our geographically distributed system of campuses, the University operates within the borders of all six regions.

Accreditation is a system of self-review wherein institutions voluntarily seek recognition. The accreditation process usually involves an exercise through which an institution measures itself against standards established by the accrediting body. Accreditation by a recognized body provides a number of benefits, including the ability to participate in federal financial aid and a basic level of quality assurance, which should provide for acceptance of degrees and credits from the institution.

The system of regional accreditation has served University of Phoenix well over the past 26 years. We have developed a collaborative and collegial relationship with our regional accrediting association and the process has helped us to improve as an organization. The Higher Learning Commission of the North Central Association has been evolving, along with <u>most</u> of the other regional associations, to accommodate the realities of a changing higher education landscape and to allow for and embrace new ways of delivering education, ensuring quality, and promoting learning. We have found the evaluative function of the HLC to be rigorous and thorough. We have also felt in recent years an even greater desire on their part to take a consultative approach to advise us in our continuous improvement efforts. This consultative aspect has provided a value-added element for us in the accreditation process that has helped to mitigate some concerns with the time and expense of the process.

We believe that regional associations are demonstrating that they are equipped to judge the academic quality of institutions. The University does not support further overlap of the Department of Education's role into the traditional quality assurance function of the accreditation process. The traditional triad of the accrediting bodies' responsibility for quality assurance; the Department of Education's oversight of compliance; and the

states' role in consumer protection continues to serve the public well. As we look toward the future and meeting the growing and diverse educational needs of the country, it is imperative that this triad stays appropriately balanced. While ensuring the quality and strength of educational programs remains key, unnecessary and burdensome overlap in roles and responsibilities threatens to weigh down this process and prevent institutions of higher learning from quickly responding to and meeting the needs of the nation's workforce.

The current system of overlap has already created many challenges for institutions of higher education. The geographical expansion of institutions like University of Phoenix has created such a challenge for the regional system because many institutions now operate in multiple regions. The Council of Regional Accrediting Associations (CRAC) created an interregional "protocol" for dealing with these challenges through fostering joint cooperative accreditation visits. University of Phoenix has been among the first institutions to participate within this new protocol. For the most part, it has worked well but the time and expense of the process have been somewhat onerous. As the regions become more comfortable with the rigor and standards of their colleagues, this process should speed up and become more efficient. In our experience, cooperation and collegiality among the regions has not been universal but we have successfully worked our way through this process and it is improving.

However, it is obvious to us as an institution that we have taxed the abilities of the regional bodies to cooperate. Each regional accreditor evaluates according to essentially the same criteria, but judges the compliance with different standards. When an institution such as the University of Phoenix goes through an accreditation visit, it is often faced with meeting the standards of six different regions as well as those of the states in which it operates. Compliance with these differences is not a question of simply meeting the highest level of standards, since the standards are sometimes inconsistent and at worst disconsonant. These differences result in institutions and regional accrediting bodies refusal to acknowledge accreditation by another region as equivalent, thus reducing the portability of degrees. Students then have fewer options for transfer and often must repeat courses, which may result in additional student debt load. From a public policy perspective it is clearly preferable to have some baseline recognition for transfer credits and degrees ensured with accreditation by a recognized body.

In addition to regional accreditation, specialized programs in areas such as nursing, counseling, education, business, and engineering also have national "professional" accreditation bodies from which institutions may seek accreditation. In the case of University of Phoenix, our nursing and mental health counseling programs are accredited by their respective professional associations. There are additional costs to this process—which we consider to be a cost of doing business. Where possible, we believe these bodies should be encouraged to even greater cooperation with the regional accreditation associations to avoid duplication of visits and requirements.

Institutions such as University of Phoenix who operate across state lines are institutions that have the capability of helping the nation deal with severe workforce shortages in areas of critical need such as nurses and teachers. Yet, we are faced with another problem. In carrying out their "consumer protection" role, most states have created educational bureaucracies that impose, in practice, an additional level of "accreditation." This would not be problematic if there were common standards across states and between states and accreditation associations. It is a problem, however, because as we jokingly observe, every state acts as if it "invented" education. That means that in addition to having to go through the accreditation process regionally we go through it in almost every state. Additionally, to receive approval to offer programs in nursing or education we must go through an additional level of oversight—and here again, every state is slightly—or in some cases dramatically-- different. Again, University of Phoenix recognizes this as a cost of doing business but we find that this creates a structural impediment to any real national initiatives that might all us to deal with critical workforce shortages in an effective way.

In summary, I would suggest that this committee consider the following issues:

1. Accreditation as a method of self-regulation should continue, but with an emphasis on standardization amongst accrediting bodies to allow for portability of degrees and workforce preparedness.
2. State regulation should focus on consumer protection and not be viewed as a substitute for accreditation nor another level of accreditation review.

**NACIQI:**
This afternoon I'd also like to briefly mention the work of the National Advisory Committee on Institutional Quality and Integrity – referred to as NACIQI. Last October, I was pleased to be asked to serve as a member and Vice Chair of this committee, which plays an important role in the accreditation arena.

NACIQI was created by Congress in 1992 and held its first meeting in 1994. The committee has 15 members who are knowledgeable concerning higher education and who represent all sectors and types of postsecondary institutions, including a student member. The statute gives the committee rather broad authority to advise the Secretary on accreditation as well as institutional eligibility and certification issues; to date, the committee has focused most of its attention on accreditation matters.

We meet twice each year for two or three days each meeting. Our main activity at these meetings is to review accrediting agencies that apply for recognition by the Secretary of Education to determine whether those agencies meet the Secretary's criteria. Those criteria are outlined in Title 34, Part 602 of the Code of Federal Regulations, but they are also delineated to a great extent in the statute itself. (Please note that the Secretary also recognizes, under different criteria, State approval agencies for nurse education and State approval agencies for public postsecondary vocational education.)

Requesting recognition by the Secretary is voluntary, and since 1992, Secretarial recognition has been limited to only those agencies that can establish that their accreditation is necessary for an institution or educational program to seek eligibility to participate in the Federal student financial aid program, or programs offered through other Federal departments. If an agency cannot demonstrate that it has this link to Federal funds, it cannot be recognized by the Secretary even if it meets all other criteria.

The Secretary's criteria pertain to the agency's accreditation policies and procedures, and most importantly, the standards that the agency expects its institutions and/or programs to meet in order to gain or retain accreditation status. The agency is required to have standards that address certain areas. For instance, the agency must have standards that measure success with respect to student achievement, standards that cover curricula, standards that deal with student support services, and so forth. The Secretary's criteria also acknowledge the agency's option to establish accreditation standards for areas other than those specified by the Secretary. However, the NACIQI does not review the agency's standards in any areas not required by the Secretary's criteria.

Prior to the NACIQI meetings, Department of Education staff does an initial analysis of the agency's compliance with the criteria. At the meetings, the NACIQI members hear the staff's assessment, but also hear remarks from agency representatives and interested third parties. Although the members usually concur with the staff's assessment, the NACIQI members do bring a different perspective to the review process, and there are some instances when the NACIQI members do not agree with Department staff as to whether an agency actually complies with the Secretary's criteria. Having the Committee involved in gauging agency compliance with the criteria, therefore, provides for a second level of review, or you might say, a system of checks and balances in the recognition review process.

After reviewing all written documentation and considering all oral comments concerning an agency, the NACIQI votes on whether or not to recommend recognition. The recommendations of the NACIQI are then forwarded to the Secretary, and he makes the final decisions. When an agency receives recognition by the Secretary, it means that he considers the agency to be a reliable authority as to the quality of education offered by the institutions or programs that the agency accredits. The Secretary's current list of recognized accrediting agencies includes ten regional accrediting commissions, seven national institutional accreditors, and 42 specialized accreditors.

In undertaking the review of agencies, the members strive to be thorough, fair, and consistent in assessing the compliance of agencies with the criteria. Based on my observations as the Vice Chair of the NACIQI, the members are very diligent in exercising their responsibility to the Secretary, to the education community, to the taxpayers, and to the students, who are the consumers that deserve quality education. I have some additional information regarding the NACIQI and the Department of Education's role in accreditation that I would like to submit into the record. Again, I

thank you for the opportunity to highlight this information and I would be happy to answer any questions you might have for me.

***Additional Information on the Role of the National Advisory Committee on Institutional Quality and Integrity and the U.S. Department of Education in the Accreditation of Postsecondary Education***

***I. The National Advisory Committee on Institutional Quality and Integrity***

The role of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) is to advise the Secretary of Education on matters pertaining to the accreditation of postsecondary institutions, accreditation being one of the critical eligibility factors for participation of these institutions in the Title IV student financial assistance programs as well as other Federal programs.

The (NACIQI) was created by the Higher Education Amendments of 1992 and held its first meeting in 1994. Section 114 of the Higher Education Act, as amended, authorizes the Committee, describes its membership and functions, and establishes the requirement for an annual report to Congress. Section 115 of the HEA provides for student representation on the Committee.

***Meetings***

The NACIQI meets twice a year, in May or June and in November or December. The main agenda item is the review of petitions for recognition by the U.S. Secretary of Education submitted by accrediting agencies and State approval agencies. The NACIQI makes recommendations to the Secretary, who makes the final decisions regarding recognition. The NACIQI is subject to the provisions of the Federal Advisory Committee Act, which means it provide due notice of its meetings, conduct its business in public, allow procedures for public comment, provide a record of its proceedings, and report annually on its activities.

***Membership***

The NACIQI is composed of 15 members appointed by the Secretary from individuals who are knowledgeable concerning postsecondary education, including representatives of all sectors and type of institutions of higher education, as well as a student representative. A member's term of office is for three years, beginning October 1 and ending September 30. There is no limit on the number of terms a member may serve. The Secretary is required by statute to solicit nominations each year for new members to replace those members whose terms are expiring.

***Current Members***

Dr. Robert C. Andringa (Committee Chairperson)
President, Council for Christian Colleges & Universities, Washington, DC

Dr. Laura Palmer Noone (Committee Vice Chairperson)

President, University of Phoenix, Arizona

Honorable Randolph A. Beales
Former Attorney General of Virginia
Attorney at Law, Christian/Barton, LLP, Virginia

Dr. Karen A. Bowyer
President, Dyersburg State Community College, Tennessee

Dr. Lawrence W. Burt
Director, Student Financial Services, University of Texas at Austin

Dr. Lawrence J. DeNardis
President, University of New Haven, Connecticut

Dr. Gerrit W. Gong
Assistant to the President, Brigham Young University, Utah

Mr. David Johnson, III
Student, Brigham Young University and University of Utah

Dr. Estela R. Lopez
Vice Chancellor for Academic Affairs, Connecticut State University System Office

Dr. Ronald F. Mason, Jr.
President, Jackson State University, Mississippi

Mr. Donald R. McAdams
President, Center for Reform of School Systems, Texas

Mr. Steven W. McCullough
Executive Director, Iowa Student Loan Liquidity Corporation

Dr. George A. Pruitt
President, Thomas A. Edison State College, New Jersey

Dr. Eleanor P. Vreeland
Chairman, Barland Educational Associates, Florida

Dr. John A. Yena
President, Johnson & Wales University, Rhode Island

***Purpose and Functions***

As specified in the statute, the NACIQI advises the U.S. Secretary of Education regarding the following matters:

- The establishment and enforcement of criteria for recognition of accrediting agencies or associations under subpart 2 of part H of Title IV, HEA.
- The recognition of specific accrediting agencies or associations.
- The preparation and publication of the list of nationally recognized accrediting agencies and associations.
- The eligibility and certification process for institutions of higher education under Title IV, HEA.
- The development of standards and criteria for specific categories of vocational training institutions and institutions of higher education for which there are no recognized accrediting agencies, associations, or State agencies in order to establish the interim eligibility of those institutions to participate in Federally funded programs.
- The relationship between (1) accreditation of institutions of higher education and the certification and eligibility of such institutions, and (2) State licensing responsibilities with respect to such institutions.
- Any other advisory functions relating to accreditation and institutional eligibility that the Secretary may prescribe.
  *(For example, the Secretary of Education, under the terms of a Letter of Understanding between the Secretary and the Director of the Office of Management and Budget (OMB), is responsible for reviewing requests from Federal institutions or agencies for degree –granting authority. The Secretary has assigned to the NACIQI the review of such requests.)*

***NACIQI Review of Petitions for Recognition***

Since its first meeting in 1994, the NACIQI has spent the majority of its time on the review of three categories of agencies for the purpose of making recommendations to the Secretary as to whether those agencies meet the criteria for recognition by the Secretary. The three categories and the criteria that each must meet are listed in the table below.

| *CATEGORY* | *CRITERIA* |
|---|---|
| Accrediting agencies for postsecondary institutions and programs (including regional institutional accrediting agencies, national institutional agencies, and specialized/programmatic accrediting agencies) | Part 602<br>*of Title 34 of the Code of Federal Regulations* |
| State approval agencies for nurse education | Criteria for State Agencies<br>*Published in January 16, 1969 Federal Register* |
| State approval agencies for public postsecondary vocational education | Part 603<br>*of Title 34 of the Code of Federal Regulations* |

After each meeting, the Committee's recommendations are forwarded to the Secretary of Education, who makes the final decision regarding all agencies seeking recognition. *A listing of recognized agencies is* available at the Department's web site at the following address:

http://www.ed.gov/offices/OPE/accreditation/natlagencies.html

***Reports***

Each year the Department is required, under the provisions of the Federal Advisory Committee Act, to submit a report on the NACIQI to the General Services Administration's Committee Management Secretariat. The reports are available on GSA's website at: www.gsa.gov.

The Department is also required to submit a annual report on NACIQI activities to Congress. Copies of those reports are available by contacting the Committee's Executive Director at (202) 219-7009.

***II. The U.S. Department of Education's Role in Accreditation***

Accreditation arose in the United States as a means of assuring a threshold of quality in education. Through a non-governmental process, educational institutions voluntarily seek accreditation from private, non-profit accrediting agencies. These accrediting agencies, created by various professional associations or by the postsecondary institutions themselves, establish standards that they believe are essential to a quality educational program. An agency's award of accreditation is a status of public recognition that an educational institution meets the accrediting agency's standards and requirements.

The U.S. Department of Education does not accredit schools or educational programs or get directly involved in the accrediting decisions of accreditors. However, the U.S. Secretary of Education does evaluate the standards, policies, and procedures of accreditors that seek the Secretary's recognition. The Secretary also periodically publishes a listing of nationally recognized accrediting agencies that the Secretary determines to be reliable authorities as to the quality of education and training provided by the postsecondary institutions and the higher education programs they accredit. Authority for this activity is established in the Higher Education Act of 1965, as amended, and is guided by regulations found in 34 CFR Part 602.

The Secretary currently recognizes 59 accrediting agencies. These agencies specialize in accrediting institutions or programs that include all types of institutions (public, private, non-profit and proprietary) and a wide range of educational programs. They include agencies that accredit multi-disciplined universities as well as those that accredit smaller specialized institutions or even a specific program within an institution. They include accreditors of educational institutions and programs that offer education and

training in business, various vocational education specialties, theology, psychology and counseling, art and music, medicine and pharmacy, nursing and midwifery, liberal arts, teacher preparation, public health, and law, to name a few.

***The Recognition Process***

Seeking recognition by the Secretary of Education is voluntary, and since 1992, Secretarial recognition has been limited to only those agencies that can establish that their accreditation is necessary for an institution or educational program to seek eligibility to participate in the Federal student financial aid program, or programs offered through other Federal departments.

Agencies applying for recognition must demonstrate that they comply with the Criteria for Secretarial Recognition (34 CFR Part 602) and are reviewed by the **National Advisory Committee on Institutional Quality and Integrity (NACIQI)**. The NACIQI makes recommendations to the Secretary of Education, who makes the final recognition decisions.

The Secretary's Criteria cover all aspects of an accrediting agency's process of accreditation -- its accrediting policies, procedures, and accreditation standards and requirements. These Criteria may be viewed at http://www.ed.gov/offices/OPE/accreditation/part602.html. Agencies must provide evidence that they have rigorous standards to which they hold their accredited institutions responsible. These standards must cover the following areas:

- Student achievement;
- Curricula;
- Faculty;
- Facilities equipment and supplies,
- Fiscal and administrative capacity;
- Student support services,
- Recruiting, admissions, advertising; and grading
- Program length and objectives of the degree offered;
- Student complaints; and
- Compliance with the responsibilities for administering the federal student aid program.

The areas in which accrediting agencies are required to have standards are established in the Higher Education Act. In addition, the statute prohibits the Department of Education from requiring or reviewing standards in other areas, although, accrediting agencies may, at their discretion, develop standards in other areas.

Recognized accreditors must demonstrate that they monitor their accredited institutions for continued compliance with their standards, and that they have accrediting policies and practices that ensure that the standards remain current and appropriate and that

the standards are applied fairly and consistently to all institutions they accredit. Agencies are re-evaluated at least once every five years.

**SUPPLEMENTAL TESTIMONY BEFORE THE HOUSE SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS BY**

**LAURA PALMER NOONE, Ph.D., J.D.**

Because the October 1, 2002, testimony before the House Subcommittee on 21st Century Competitiveness was cut short, I seek this committee's permission to submit supplemental written testimony in order to expand on a few key items that I touched upon in my live testimony. Specifically, I would like to take this opportunity to highlight some of the discrete challenges faced by accrediting bodies, state regulatory agencies, and higher education institutions alike in the current fragmented oversight system.

As I stated in my recent testimony, the regional accreditation process, through our relationship with the Higher Learning Commission, has served University of Phoenix and its students well. Notwithstanding those benefits, higher education has become exponentially more complex over the last 10 years, with many institutions delivering education in multiple states through both campus-based operations and distance education modalities. This increase in universities' multi-state operations is in turn placing an increased burden on accrediting and state regulatory bodies.

Regional accrediting bodies have worked hard to meet the challenges these circumstances present, yet the public—and even higher education institutions—remain largely uninformed about these bodies' recent innovative efforts and work. In describing the accreditation process, The Chronicle of Higher Education used the term "complex" and pointed out that, "by and large, most people in higher education know little about the process or the significance of accreditation." ("What Administrators Should Know About Accreditation," The Chronicle: Career Network 10/26/2001.) The public and higher education administrators would likely have a more favorable view of the accreditation process if they better understood its purposes and processes.

With respect to the state regulatory bodies, virtually every state in the nation is faced with severe budget cuts, resulting in a lack of fiscal and human resources. Most states have just one or two staff persons who are responsible for reviewing and vetting every application for new institutional licensure, new programs and new campus locations. Regulation of distance education is currently in its infancy and has not even been taken into account in apportioning human and fiscal resources at state agencies. A more cooperative approach among agencies responsible for quality review of institutions and programs would help reduce existing redundancies and would offer these agencies greater economies of scale in utilizing their very scarce resources.

A system must be developed to recognize and address the increasingly national and international nature of education and the need for educators to respond quickly in the face of workforce demand. Gone are the days when a person worked in the same career—let alone in the same company—from ages 18 to 65. The current "baby boom" generation and their children will change careers more often than any previous generation. In order to support this emerging workforce, institutions must be able to respond with programs that will facilitate re-careering and focus on workforce preparedness from a national perspective.

Workforce preparedness no longer equates to traditional notions of vocational education. We are becoming—or perhaps have become—a society of knowledge workers. The importance of workforce preparedness cannot be overstated. Every institution of higher education must focus on workforce preparedness if the nation is to have adequate human resources to meet domestic workforce needs and compete in the global economy.

Yet colleges and universities cannot adequately respond to the most pressing current workforce needs—for example, the tremendous need for teachers and nurses—in the current regulatory system. *Not* because the states or accrediting bodies are obstructionist, but because the current system of oversight cannot accommodate national educational initiatives.

Much of the testimony provided by other participants might have led the subcommittee to believe that accreditation review processes are superficial. Yet, the University of Phoenix experience has been that accreditation has been a very thorough, fair and rigorous system of peer evaluation and consultation. In our most recent accreditation visit, the University hosted 18 evaluators in a process that included site visits to 15 campus locations, and spanned six months. The process was appropriate for a geographically distributed system such as ours and made good use of the interregional protocol established for those institutions operating across the regional lines.

I wish to reiterate that University of Phoenix does **not** favor disbanding the regional accrediting bodies or significantly reducing their current authority. Nor does the University favor an attempt to usurp states' authority to ensure that their citizens receive a quality education free from unfair treatment.

However, without a cooperative regulatory structure that facilitates communication and coordination among the accrediting agencies and the state regulatory bodies, the splintering of accrediting and state oversight frameworks will only increase. As that happens, institutions will be forced to devote more of their finite resources to the oversight process and will remain hamstrung in any attempt to offer a national solution to educational issues. Students will ultimately pay the price in the form of higher tuition and decreased portability of degrees and transfer credits; and the nation will suffer from a marked delay in developing appropriately educated workers.

As a more specific addendum to suggestions made at the conclusion of my recent live testimony, and assuming that a group has not already been assembled, I would like to

suggest that the committee bring together a representative group from the various oversight bodies: the Department of Education, the regional and national accrediting agencies, and the state regulatory agencies. In addition, representatives from institutions that participate in the accreditation and state regulatory processes should be included on some level to ensure a comprehensive discussion of the current issues. I would further suggest that the chairperson of this group be an informed but disinterested party, to foster the greatest level of participation and cooperation among the constituent groups. This assemblage could examine other highly regulated industries to determine whether a cooperative regulatory model exists that could be adapted and applied to the higher education environment.

On behalf of the University of Phoenix, I thank you for the privilege of testifying before this committee and for the opportunity to offer this supplemental testimony.

## *APPENDIX G -- WRITTEN STATEMENT OF THE HONORABLE HANK BROWN, PRESIDENT AND CEO, DANIELS FUND, GREELEY, COLORADO, AND FORMER UNITED STATES SENATOR FROM THE STATE OF COLORADO*

The Views of a Former College President on Accreditation in Higher Education
U.S. House of Representatives
Committee on Education and the Workforce
October 1, 2002

Hank Brown

As a former college president, I am pleased to share with the Subcommittee on Twenty-First Century Competitiveness my views on our system of accreditation.

At the outset, I wish to encourage you to read the study that has just been released on higher education accrediting by the American Council of Trustees and Alumni. The study, "Can College Accreditation Live Up to its Promise?" raises important questions about the accreditation system that should have been raised years ago.

Voluntary accreditation of educational institutions serves a useful function. It tells prospective students – and parents – that they can have confidence that an accredited school meets the standards of the accrediting agency and will, therefore, provide at least a reasonable measure of value. Just as a heart patient would have more reason to trust in the ability of a doctor who was certified as a cardiac specialist than an MD who was not, so would those who want post-high school education have more reason to trust that a college or university accredited by a reputable organization would give them a sound education than a school that was not accredited. In a world where we have to make choices without having perfect information, clues on reliability such as accreditation are valuable.

For a long time, accreditation in America was voluntary. The first accrediting associations were formed in the late-1800s. They established standards that differentiated between institutions that called themselves "colleges" but were not in fact institutions of higher education and those that really merited the designation college or university. That was useful information for consumers, especially at a time when it was far more difficult to acquire information than it is today. During those years, many institutions sought and received accreditation, but there were also some reputable schools that chose not to pursue accreditation.

When the federal government began to provide financial aid to students, however, Congress thought it needed to have some assurance that student aid funds would not be squandered at institutions that would take the money but provide little if any educational value in return. Therefore, starting with the 1952 Higher Education Act, Congress linked eligibility to receive federal student aid funds with accreditation. Non-accredited colleges would be unable to take student loans or grants, thus being shut off from an increasingly large percentage of the student population. From that time on, for a school to remain indifferent to accreditation, or to lose its accreditation, would be very costly. Accreditation is still voluntary, but unaccredited schools are at a great disadvantage in recruiting students.

Today, almost all colleges and universities in the United States are accredited by one of the recognized accrediting agencies. No school wants to be forced to turn away students who are dependent on student aid. The question is whether the now almost mandatory and universal accrediting system we have still works to ensure academic quality. I do not think that it does.

As I survey the higher education landscape in America, I see evidence of serious decay in quality at many institutions, despite the fact that almost every college and university is accredited. Grades have been going up at the same time the quantity and quality of work required of students has been going down. Desiring to keep students happy while leaving more time for their own research, some professors have watered down their courses and no longer give pointed criticism to student writings.

Another sign of eroding educational quality is the curriculum. Decades ago, most schools had a sound core curriculum of courses that would give each student a broad, general education. Now, few schools still have a core curriculum. Most have adopted the "distribution requirements" approach, instructing students that to graduate, they must take at least a certain number of courses in each of several different fields. That means that students don't necessarily have much of a shared college experience any more, especially since schools tend to be very lenient in allowing courses to fulfill the requirements. If students can fulfill a history requirement, for example, with "History of College Football" just as well as with "History of the United States," we are losing our educational integrity.

I have often heard complaints from businesses that newly-hired college graduates need remedial training in fundamentals like memo writing. Sometimes, particularly in technical fields, they have to hire foreigners because they can't find young Americans with the right skills. In an interesting book published in 1999, *Who's Not Working and Why*, economists Frederic Pryor and David Schaffer noted the increasing phenomenon of college graduates who have to take what have traditionally been "high school jobs" due to their low levels of cognitive abilities. The authors stated that "The low functional literacy of many university graduates represents a serious indictment against the standards of the U.S. higher educational system." They're right. Some schools now graduate students who have received an education in name only.

All of this educational decline has occurred despite the fact of accreditation. Colleges and universities that were allowing academic standards to slide and the curriculum deteriorate with a hodge-podge of quirky, academically dubious courses nevertheless sailed through their reaccreditation visits. How could that be? The surprising fact is that the standards for accreditation have little to do with teaching and learning. Accreditation standards focus the *trappings* of higher education and presume that educational quality is at least adequate as long as all the component parts check out.

Consider an analogy. Suppose that an orchestra needed a new violinist. We know how auditions are actually held -- the conductor will have each auditioner play some music and, based on what he hears, decide who is the best. But what if the conductor instead

checked to make sure that each candidate satisfied a number of peripheral matters. " Do you have a good quality violin? Do you have adequate practicing facilities? Did you study under a reputable teacher? Do you have appropriate concert attire? Do you have a statement on your dedication to music? Have you done a self study on your approach to musicianship?" Obviously, that would not be a good way of identifying the best performer. One might fulfill all the standards and yet not be competent. Conversely, one might not fulfill them and still be an excellent performer.

College accreditation is like the latter approach to auditioning. It looks to standards that are incomplete. For example, accrediting standards generally require that colleges and universities hire faculty members who have the terminal degree in their field. That standard restricts the range of choice schools have for faculty positions, but it does not ensure good teaching. There are some people with a Ph.D. who are unable to teach effectively. Yet accreditors smile on a faculty list that contains all Ph.D.s as if that credential answers all questions.

Accrediting in the U.S. often comes down to a formula. Schools that run their operations in accordance with the accreditors' formula for a good college – having the right inputs and policies – tends to remain accredited. When a school is not in alignment with the formula, it may have its accreditation suspended or (very rarely) revoked. The most common reason for accrediting sanctions is financial difficulty. Schools that face financial difficulty may nevertheless be teaching their students well. On the other hand, schools that are financially solid may be teaching their students poorly.

Direct measurements of academic quality are certainly difficult. It is hard enough for a college president, who is on campus year round, to get a clear picture of the kind of instruction that goes on in his school's classrooms. Is Professor Smith's English class rigorous and challenging – or is it mostly fun and an easy A? It is hard to know. For an accreditation team that is on campus for only a day or two, it would be very difficult to get a feeling for academic quality. Often, they don't try. They scrutinize all the peripherals instead.

Sometimes there is benefit in that scrutiny. But we should not make it mandatory out of a mistaken belief that accreditation is synonymous with good academic quality. At one time it may have been, but that is simply not the case today. That is one unintended consequence of turning the private, formerly voluntary accreditation system into the government's instrument for screening out schools that are intellectual frauds and should not receive government funds. The value of accreditation has been reduced by giving it the role of national gatekeeper.

There is another unintended consequence that bears discussion. By making the accreditation agencies the gatekeepers for access to so much federal money, we have given them enormous leverage over the institutions they oversee. That leverage has the potential for abuse. It is subject to political and socio-economic agendas of the heads of the accrediting agencies, rather than just to make sure that the insitution is well run.

In the early 1990s, then-Education Secretary Lamar Alexander suggested that it might be a good idea to sever the connection between accreditation and eligibility for student aid funds and a House bill was drafted that would have done so. The accreditors obviously got the message, as there have been no overt threats of sanctions against schools that do not refuse to go along with the politically correct movement in recent years. Accreditation reports still occasionally express "concerns" about the school's commitment to a variety of politically correct standards.

Finally, there is the matter of cost. As the president of a university, I was acutely aware of the need to contain the rising cost of higher education. The cost of attending college has risen at a rate that is significantly higher than the increase in the cost of living. The accrediting system contributes to that cost spiral in two ways. First, preparing for a school's ten-year accrediting review is costly. There is an enormous amount of paperwork involved and a large diversion of personnel time. Then, the visiting accreditation team's report may contain recommendations for new expenditures.

In summary, Congress has placed too much reliance on this system. The system has failed to ensure academic quality. Accreditation has not upheld sound educational standards. Schools seldom lose their accreditation because of academic deficiencies, yet we know that many students now graduate with little to show for their college years. The power that has been put in the hands of the accreditors – power to decide which schools will be eligible to accept the federal student aid funds that are vital to the survival of many institutions – has sometimes been abused.

I urge the Committee to develop a better way of ensuring that federal student aid funds are not wasted.

## *APPENDIX H -- WRITTEN STATEMENT OF LINWOOD H. ROSE, PRESIDENT, JAMES MADISON UNIVERSITY, HARRISONBURG, VIRGINIA*

**U.S. House of Representatives**
**Committee on Education and the Workforce**
**Testimony of Linwood. H. Rose**
**President, James Madison University**
**October 1, 2002**

Chairman McKeon, members of the committee and ladies and gentlemen, I serve as president of James Madison University in Harrisonburg, Virginia. James Madison is a selective, public comprehensive University of 15,400 students. The institution is generally regarded as a leader among colleges and universities in the assessment of learning and skill development. I appreciate the opportunity to offer a few remarks to the committee on the topic of institutional accreditation.

James Madison University is accredited by the Southern Association of Colleges and Schools, Commission on Colleges. The Commission on Colleges of the Southern Association of Colleges and Schools is the recognized regional accrediting body in the eleven U.S. Southern states (Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas and Virginia) and in Latin America for those institutions of higher education that award associate, baccalaureate, master's or doctoral degrees. The Commission on Colleges is the representative body of the College Delegate Assembly and is charged with carrying out the accreditation process.

Having been at JMU for 27 years, I have participated in and observed the regional accreditation process first hand. As a member of the Executive Council of the Commission I have witnessed the transition of the accrediting body's expectations from one of establishing minimal thresholds for performance to the promotion of campus cultures for institutional effectiveness and accountability. I have seen us move from the measurement of inputs as surrogates for quality to a focused effort on the evaluation of student learning and progress.

Although the procedure will change in January 2004, each college or university applying for accreditation or renewal of accreditation is currently required to conduct a comprehensive study of its purpose, programs, and services. On each campus, faculty, administrators, staff, students, trustees, and others serve on committees that study all aspects of the institution, report their findings, and offer advice on improvement. This process results in a document evaluating the institution's effectiveness in reaching its stated goals and its compliance with the Criteria.

At the culmination of the self-study, the Commission on Colleges sends a visiting committee of professional peers to the campus to assess the educational strengths and weaknesses of the institution. The written report of the visiting committee helps the institution improve its programs and also provides the basis on which the Commission decides to grant, continue, reaffirm, or withdraw accreditation.

During a typical four-day visit, committee members examine data and conduct interviews in order to evaluate the quality and accuracy of the self-study and ascertain whether the institution is in compliance with the Criteria. The committee offers written advice to the institution, develops a consensus on its findings, and completes a draft report. Finally, the committee presents an oral summary in an exit report to the chief executive officer and invited institutional officials on the last day of the visit.

The departure of the committee from campus does not mark the end of the accreditation process. The visiting committee report and the response of the institution to the findings of the committee are reviewed by the Committee on Criteria and Reports, a standing committee of the Commission. The Committee on Criteria and Reports recommends action on accreditation to the Executive Council of the Commission. The Executive Council, in turn, recommends action to the Commission on Colleges, which makes the final decision. These decisions are announced to the College Delegate Assembly during its annual business session.

In a typical cycle, reaffirmation of accreditation occurs every ten years. James Madison University just last year completed our self-study and we hosted a visiting team of peer professionals in April. We have responded to the visiting teams recommendations and await action by the Commission on Colleges at its

December meeting. Like James Madison, most institutions will correct any deficiencies identified by the peer review process. If an institution fails to correct deficiencies, it may be placed on Notice, Warning, or Probation, or may lose its accreditation, depending on the seriousness or duration of the deficiencies.

Earlier I referred to a transition in accreditation philosophy and methodology. The membership concluded that the standards and practices employed by the COC in accreditation needed review and modification. Following a comprehensive review and drafting process led by a 13-member steering committee, the total membership of the Commission on Colleges adopted new ***Principles of Accreditation: Foundations for Quality Enhancement*** in December 2001. The Accreditation Review Project had five goals:

1. Develop valid, relevant, clear and concise standards that concentrate on best practices in higher education and recognize the Commission's diverse membership,
2. Streamline the internal review process, create better value for the institution, and make it more cost effective.
3. Enhance the effectiveness, efficiency and consistency of the external review process,
4. Increase attention to student learning outcomes and institutional improvement.

5. Ensure that standards and review processes foster a strong culture of institutional integrity, are appropriate for the changing higher education environment, and benefit the institution and the public.

The new process is reliant upon two key principles: institutional integrity and commitment to quality enhancement; and it is divided into three sections: 12 core requirements; comprehensive standards incorporating mission, governance and effectiveness, programs, and resources; and, Federal mandates not included as part of the comprehensive standards.

The institutional self-study is replaced, in this new process, by an enhanced institutional profile submitted to the COC, by a compliance certification, and by the institution's Quality Enhancement Plan. These documents will be reviewed by an off-site peer review committee, an on-site peer review committee and ultimately, by the Commission.

It is hoped that the new process will:

1. be less prescriptive;
2. allow for greater institutional flexibility;
3. focus institutional resources and manpower on issues of greatest concern to the institution;
4. be more cost effective; and
5. assume an institutional level of maturity.

Eight institutions have piloted the new review procedures in their accreditation reviews over the last two years. The new standards and review processes, modified in accord with the lessons learned from the pilots will become fully effective in January 2004. Regional training sessions are now underway for institutional leaders to learn more about the application of the ***Principles*** .

While the methodology and focus of peer review may change over time, the primary purpose of accreditation remains to enhance educational quality throughout the region by improving the effectiveness of institutions, and ensuring to the public, that institutions meet standards established by the higher education community. Accredited status signifies the institution has a purpose appropriate to higher education and has resources, programs, and services sufficient to accomplish that purpose on a continuing basis. The process will continue to assess whether an institution maintains clearly specified educational objectives that are consistent with its mission and appropriate to the degrees it offers and whether it is successful in achieving its stated objectives. As an institutional leader, I can tell you that the process works and I applaud the Commission's interest in, on the one hand, insuring appropriate levels of accountability for fundamental expectations of operation, and while on the other, moving beyond the basics to educational quality enhancement.

Mr. Chairman, thank you for the opportunity to comment. I hope that this testimony has proved useful to the Committee.

Sources:

**Principles of Accreditation: Foundations for Quality Enhancement,** presented by James T. Rogers, Executive Director of the Commission on Colleges, 2002 CRAC Retreat.

**Principles of Accreditation**, approved December 2001. Commission on Colleges.

***APPENDIX I -- RESPONSES TO QUESTIONS SUBMITTED FOR THE RECORD BY REPRESENTATIVE RUBEN HINOJOSA, SUBCOMMITTEE ON 21ST CENTURY COMPETITIVENESS, COMMITTEE ON EDUCATION AND THE WORKFORCE, U.S. HOUSE OF REPRESENTATIVES, WASHINGTON, D.C.***

Representative Hinojosa submitted the following question for the official hearing record of the accreditation hearing held on October 1, 2002.

Question:
"Please respond for the record as to what specific recommendations you have to improve accreditation; and should institutions of higher education be accredited in order for their students to receive federal financial aid?"

Response of the Honorable Hank Brown, President and CEO, Daniels Fund, Greeley, Colorado:

Accreditation could be improved by allowing the process to be performed by individual states, if they wish, in addition to the current system.

Response of Laura Palmer Noone, Ph.D., J.D., President, University of Phoenix, Phoenix, Arizona:

*What specific recommendations you have to improve accreditation?*

1. Greater cooperation and communication among the accreditors that implies more consistency in their standards, processes and procedures for determining the quality and accountability of institutions under their accreditation organization, especially those that cross accrediting regions

2. Increased emphasis on verification/accountability of student learning in institutions within each region's purview as a necessary condition for continuing accreditation

3. Greater cooperation and communication among accrediting organizations and state higher ed licensing agencies with the intended purpose of eliminating redundancies in regulatory oversight of higher education institutions where feasible to control for duplicative processes and costs

4. Recognition that critical workforce shortages nationally are not being met now by traditional higher education institutions whose faculty drive graduate production in areas such as teaching and nursing in large measure and whose budgets are being reduced due to state financial shortfalls. To solve these workforce shortages, alternative solutions must be implemented immediately to allow institutions that stand ready to become part of the solution to operate in jurisdictions where regulatory and accrediting obstacles which often are arbitrary at best, need to be put aside if programmatic quality can be evidenced by an institution.

*Should institutions of higher education be accredited in order for their students to receive federal financial aid?*

The Congressman also requested our input on accreditation as a tie to financial aid. Regional and national accrediting bodies, recognized by the United States Secretary of Education through NACIQI, should continue to be the requisite relationship that confers the ability to grant federal financial aid. To move this requirement to the states would create an impermissible burden on interstate commerce (fifty different sets of regulations with no consistency of application) and would overburden the states with an additional level of oversight that nearly no states are prepared to fund.

Similarly, if the federal government were to assume responsibility for oversight, the cost to the taxpayers would be enormous. The English quality audit model, which would be something closer to what some groups advocate, ran on a budget of 10 million pounds for about 100 institutions. That's about four times the annual budget of only one of the regional accreditors and would cover only a fraction of the over 3600 institutions now evaluated by regional and national accreditors.

Response of Dr. Charles M. Cook Director, Commission of Institutions of Higher Education, New England Association of Schools and Colleges, Bedford, Massachusetts:

I am pleased to provide the following responses to the questions posed by Congressman Representative Hinojosa.

*What specific recommendations do you have to improve accreditation?*

Regional accreditation in the United States has been an extremely successful social invention. It has provided meaningful assurance about the quality of our nation's colleges and universities for federal purposes for over 50 years. It has come to be universally depended upon. All are aware of the role accreditation in Title IV programs. However, accreditation also is typically the bases for participation in employer tuition incentive programs; it is one of the necessary elements in awarding student visas; and plays an important role in the transfer of academic credit assuring student mobility, among many other things. It is only accredited institutions that are found in the college and university rankings in *US News and World Report.*

What regional accreditation provides and does so extremely well is as an indicator that the accredited institutions are legitimate, credible and offer educational programming at an acceptable level. Its track record in this regard is exceptional as measured, as one example, by the historically low default rate among participating regionally accredited institutions in the guaranteed student loan program. The near universal reliance on regional accreditation is an important indicator itself of its continuing value and usefulness. In a nation where creative responses to needs emerge quite naturally, the absence of a meaningful alternative to regional accreditation can be taken as evidence that it is doing its job well.

This is not to suggest that regional accreditation is perfect. Dealing with over 3000 institutions of higher learning, essentially using volunteers to carry out its primary functions, seeking to balance non-intrusive self-regulation with the need to implement

high expectations, and recognizing the importance of preserving institutional distinctiveness produces a times less than perfect results, but I know of no institution accredited in this region which is unworthy of the confidence implied by its accreditation.

Like all successful social inventions, there are those who wish to impose additional tasks upon the regional accreditors, often reflective of their own concerns. Thus we hear demands to "do something" about grade inflation which is only an issue among a select group of institutions, to "fix" the undergraduate curriculum so that it looks more like the critic's own educational experience or reflects certain social values, or to "require" in effect the standardization of learning outcomes across our colleges and universities. That each of these proposals reflects genuine concerns and at least to some extent real problems, no one would deny. But besides often being "one size fits all" remedies which would seriously corrode the creative diversity of American higher education that has served us so well, they are the sort of tasks that would not only greatly burden regional accreditors which would greatly expand its scope while not being likely to achieve the desired results, results which may in any case not be attainable; real quality in higher education cannot be regulated.

What recommendations would I make to improve accreditation? I would seek to reduce any unnecessary requirements and eschew unrealistic responsibilities that are outside its primary purposes. I would also assure that it is held accountable for the achievement of those purposes.

*Should institutions of higher education be accredited in order for their students to receive federal financial aid?*

The answer here is a simple one. If accreditation did not exist, it would have to be invented. The federal government will continue to need the sort of assurance accreditation provides, that is fundamental quality assurance for eligibility to participate in Title IV programs. Its absence and in the lack of a suitable alternative by which basic institutional legitimacy can be determined, fraud and abuse on a massive scale will result producing a nightmare which will hurt legitimate students seeking to attend legitimate colleges and universities, those institutions, and otherwise greatly harm the social fabric. Within a brief time a dependence on accreditation will of necessity have to be reinstated or an alternative developed probably at great federal expense, not likely as effective as what we have today, and with the potential for ham-handed and burdensome bureaucratic intrusiveness.

Response of Dr. Eaton, President, Council for Higher Education Accreditation, Washington, D.C.:

*Question: Please respond for the record as to what specific recommendations you have to improve accreditation; and should institutions of higher education be accredited in order for their students to receive federal financial aid?*

Accreditation of institutions and programs is the single most comprehensive means by which the country both assures and improves the quality of higher education. Staffed by a vast network of volunteers, accreditation is a process of external quality review used by higher education to scrutinize colleges, universities, and education programs for quality assurance and quality improvement. Institutions, governments, employers and the general public rely on accreditation to provide assurances that standards of quality are being met.

The federal government relies on accreditation to determine whether institutions should be eligible to receive Title IV, federal financial assistance. This private - federal partnership that characterizes accreditation in the United States today has served the public interest well for 50 years. Yet, like any human, social organization it is not without its challenges and in my testimony, I mentioned three:

1. Accountability and further development of evidence of student learning outcomes;
2. Providing additional information to the public about accredited status and the quality of institutions and programs; and
3. Assuring quality in distance learning.

*Evidence of Student Learning Outcomes*

Accrediting organizations could do more to supplement the information they and institutions currently provide with information about what students know and can do as a result of their education and how that information should be used to make judgments about institutional and programmatic quality. Accrediting organizations are keenly aware of the interest in evidence of student learning and are working to broaden their capacity to use outcomes more effectively in their review of institutions and programs.

*Better Public Information*

There is a wealth of information that accrediting organizations and institutions already provide but it is not widely known. One way to approach this problem is to have additional profiles of institutions and program performance based on readily available information such as graduation rates, retention, student mobility through transfer and entrance to graduate school. In addition, some information regarding admissions policies, institutional type and the expectations the institution has established for student success would be useful to complete the profile.

*Assuring Quality in Distance Learning*

Increasing enrollments, changing demographics, and strained resources at both the federal and state level have put pressure on institutions to serve an increasingly diverse student population. These pressures and the advances in technology have contributed to

the desire and the need for institutions to offer programs or courses via distance education.

The challenge of the accrediting community is to assure quality regardless of the instructional mode of delivery. To date, all of the 17 institutional accreditors that review institutions offering distance learning program or courses have standards, guidelines and polices in place to determine academic quality for the scrutiny of distance education. However, accrediting organizations need to remain flexible and poised to adapt as additional changes in the law governing distance learning are considered and enacted.

*Should institutions of higher education be accredited in order for their students to receive federal financial aid?*

In a word, yes. Accreditation is the primary means by which colleges, universities and programs assure quality to students and the public. Eliminating the linkage between accreditation and access to Title IV, federal financial assistance, without a meaningful alternative to assure quality put in its place, opens the door to potential fraud and abuse and does not provide the thoughtful exchange between institutions and accrediting organizations to improve quality that currently takes place.

For example, critics of accreditation often focus on the end result of an action taken by an accrediting organization, such as denial, termination, or suspension of accreditation, and fail to see all the actions taken prior to making a final determination. What is often lost in the debate is that quality improvement is both a fluid and static process: it is a measurement at a point in time against standards, to which institutions have an opportunity to respond and then the accrediting organization has the opportunity to re-assess to see if the institution has completed whatever additional work was necessary to meet the standards. If not, a judgment is made regarding the ability of the institution to carry out its mission.

Proposals to eliminate the linkage between Title IV and accreditation that do not allow for this range of activity should give policy makers cause for concern. Neither the federal government nor the states have the resources, expertise or capacity to take on this enterprise and absent any mechanism to improve quality leaves students and the taxpayers adrift as to where to find answers on basic issues of institutional and programmatic quality.

Response of Dr. Linwood H. Rose, President, James Madison University, Harrisonburg, Virginia:

My comments are grounded in my own experience with the Southeast, specifically the Commission on Colleges of the Southern Association of Colleges and Schools. The COC is moving next year to a process that we hope will be less onerous for applicant and member institutions, but one that is no less rigorous in terms of expectations. All regional

accrediting bodies will benefit from the discussions that now occur among the regional staffs and I am personally hopeful that as a result of their discussions we might improve the course credit transfer process for students who relocate to an institution in another region. The accrediting bodies are also working through improved processes for recognizing (or not) courses provided through distance education of one form or another. Finally, as the accrediting process develops further, and as institutions' efforts at assessing learning are improved, I would hope that we would see more of a dependence on learning outcomes and value added than is the case today.

I am not wed to the notion that accreditation must be a prerequisite for eligibility for federal financial aid, but as a guarantor of educational quality I can think of no better vehicle or process.

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