

**Testimony Provided for the
UNITED STATE DEPARTMENT OF EDUCATION
At the Public Hearing on Establishment of Negotiated Rulemaking for
Programs Authorized Under Title IV of the Higher Education Act of 1965**

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by
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My name is Belle Wheelan and I serve as President of the Commission on Colleges of the Southern Association of Colleges and Schools. The Commission is a regional accrediting body with a membership of approximately 800 member and candidate institutions located in eleven states in the southeastern region of the United States. I also appear today on behalf of The Council of Regional Accrediting Commissions, known as CRAC, that is comprised of the seven regional higher education accrediting commissions in the United States. My comments are meant to complement those of my colleagues, Dr. Barbara Beno, the current Chair of CRAC, and Dr. Steven Crowe, past Chair of CRAC, who spoke at the hearings in Berkeley and Chicago respectively, and addressed the Department's process of negotiated rulemaking and accreditation's role in assessing student learning. Thank you for this opportunity to briefly address a number of issues germane to higher education, accreditation, and the Department of Education. My comments, as theirs, reflect the views of the Council of Regional Accrediting Commissions.

I appear before you today having served as a leader in many of the higher education sectors identified and challenged to action in the report by the Secretary's Commission on the Future of Higher Education; as the president of two community colleges; as the Secretary of Education in Virginia; as a faculty member at several institutions; and currently as president of a regional accrediting organization. During my tenure as president of the community colleges in Virginia, I was an active participant in the work of the Commission on Colleges, not only leading my academic community during its reaffirmation of accreditation process but also as chair of visiting committees—volunteers committed to the work of the Commission. It is from these perspectives that I make my comments today.

Regional accrediting commissions are comprised of diverse memberships; their missions and governance vary. My Commission's membership includes private for-profit, private not-for-profit, and public colleges and universities; single sex institutions; historically black colleges and universities; military academies; community and technical colleges; liberal arts colleges; art institutes; chiropractic and medical schools; comprehensive graduate institutions; doctoral degree granting and research institutions; seminaries; and many other institutions of higher education that cannot be categorized. This wealth of diversity has been our region's strength—it defines our organization and demands that our self-regulatory process includes capable administrators, faculty, staff, students, and public members in conversations about the type of standards and processes that make our accreditation valuable and credible. It is this input from those representing our diverse population, their genuine respect for the organizational complexity and the myriad institutional missions in the region, and their understanding of the designed service of our colleges and universities to their respective constituents that provide a reliable structure for addressing challenges confronting higher education institutions throughout our region. It is a unique, decentralized system of people driving others toward intellectual, social, and cultural improvement.

Having described and stressed the importance of diversity in higher education and the need to understand colleges and universities in terms of their mission and service, we would like to comment on a few of the points in the Secretary's Futures Commission report which is rich with ideas. This is not a critique of those ideas; rather, it is a perspective that challenges others to consider accreditation's role in future discussions involving the transformation of higher education.

1. Faculty are key players in any change that takes place in higher education whether it pertains to defining and evaluating student achievement; developing new pedagogies, curricula and technologies to improve learning; or creating new learning paradigms. Federal mandates in the areas above do not ensure faculty "buy in" to requirements for change, but institutional success requires their commitment. The report of the Futures Commission speaks to the support of various processes needed to ensure change but, with the exception of one recommendation, does not speak directly to the faculty—the people who will ultimately drive that change if it is to be meaningful.

2. In the application of the Secretary’s criteria for recognition of accrediting bodies, it appears that the Department views all accrediting commissions as being the same with little regard for their diverse missions, the constituents they serve, or the initiation of any innovative processes that accrediting commissions may want to use to challenge institutional improvement. The federal record supports this statement. If the Future’s Commission truly supports innovation in education, then, rather than expecting all accrediting bodies to look and act alike, the Department of Education in its application of the criteria for recognition should allow for more flexibility for those accrediting commissions that present initiatives designed to encourage institutions to focus on student learning. How can accrediting commissions address fundamental issues related to the transformation of higher education when current federal regulations accept only “cookie cutter” responses?

3. There are two fundamental questions related to transparency: How will information be used and who will use it? It is reasonable to expect a higher education institution to publish consumer-friendly data about student learning in the areas of value-added learning and student achievement. This is fundamental information for any student and parent choosing a college or university. However, it is unreasonable to expect that this same information—produced in accord with a particular institutional mission—can be fed into a common data base and provide any substantive and credible information after being stripped of its mission specific goals. What is its value? You can have useful, reliable information if it is provided and published by institutions and customized to the effectiveness of their educational programs and student learning goals. But once you force this information into “common formats,” the information in the aggregate will have little value. It would be better to expect the federal government to enhance and improve the collection of information on IPEDS and other current tools and use this for the publication of aggregate data, and then expect institutions to provide and publish their own data on student learning specific to their goals and missions.

4. Regional accreditation supports the statements in the Futures Report that challenges accrediting commissions to share evaluative information with the public about an institution’s performance. However, the Report does not address three consequences when disclosure precedes final action by the accrediting commission. First, an on-site evaluation report is a snapshot of an institution taken at a particular point in time and measured against standards of

good practice in higher education. The institution is expected to use the report to make changes in areas of identified weaknesses. It is very difficult to make those changes at the same time that it is answering questions from the public regarding the committee's findings. The report is only of value to the consumer when it is weighed against the changes made by the institution to address findings. Second, and this comes as no surprise to this body, particular sectors of the public will use preliminary findings in committee evaluation reports to further that sector's own agenda rather than provide a balanced view of an institution's performance. This impedes the institution's progress in addressing areas that need change and it could influence external support for the needed change. Finally, full disclosure of evaluation reports affects the candidness and rigor of team members responsible for writing the report. Accrediting commissions would better serve the public and the institution if it released information after final action on accreditation, highlighting the strengths and weaknesses of the institution and providing areas of needed improvement. There is no question that public disclosure prior to final action by the Commission will affect the rigor of the review.

5. Dr. Crow's comments regarding student learning bear repeating. "Most regionally-accredited colleges and universities will freely testify that for the past 10 to 15 years assessment of student learning has in many ways shaped their relationship with their regional accrediting commissions." Assessment of student learning outcomes is core to the accreditation enterprise. The evaluation of "inputs" and "processes" addresses an institution's ongoing capability to sustain its assessment efforts. To be accountable to the public, accreditation must continue to address student learning *and* institutional capability.

It was my goal during this testimony to provide you with a perspective from regional accreditation that would challenge you to consider accreditation's role in future discussions involving the transformation of higher education. My CRAC colleagues and I look forward to our continuing dialogue. Thank you.