

September 19, 2013

The Honorable Tom Harkin
Chairman
Committee on Health, Education, Labor, and
Pensions
U.S. Senate
Washington, DC 20510-6300

The Honorable Lamar Alexander
Ranking Member
Committee on Health, Education, Labor, and
Pensions
U.S. Senate
Washington, DC 20510-6300

Dear Chairman Harkin and Ranking Member Alexander:

We write on behalf of the Association of Community College Trustees (ACCT) concerning the Committee's request for views on the upcoming reauthorization of the Higher Education Act. ACCT represents the trustees of our nation's community colleges. Community colleges are recognized for their critical place in our nation's education system, economy, and society. These colleges enroll well over 40 percent of all students in the nation's higher education system – totaling more than 14 million students each year – and play an essential role in providing educational opportunity and workforce development.

No federal legislation is more important to community colleges and their students than the Higher Education Act (HEA). Community colleges would look very different, and some would not exist today, were it not for the national investments made through the HEA. The upcoming reauthorization process gives Congress the opportunity to make needed improvements to critical student financial assistance and institutional aid programs.

As the first of a series of topics related to HEA reauthorization, we look forward to the continued opportunity to provide feedback. The comments found below follow the Committee's request for input in advance of the September 19, 2013 hearing entitled "*The Triad: Promoting a System of Shared Responsibility. Issues for Reauthorization of the Higher Education Act.*"

Accreditation at Community Colleges

Under the "triad" system, community colleges undergo a rigorous evaluation process that has given the public great confidence in the high quality of education provided to their students in degree, certificate, and credential programs nationwide. Institutions choosing to participate in Title IV, HEA programs must be accredited by an agency recognized for that purpose by the U.S. Department of Education (ED); be licensed or otherwise legally authorized to provide postsecondary education in the state in which it is located, and deemed eligible and certified to participate in federal student aid programs by ED. This complex system has resulted in a

thorough assessment of quality that has protected institutional autonomy with respect to academic offerings. As a result, community colleges must go through hundreds of steps to ensure that their programs meet the requirements and standards of the 'triad' before they can be offered to students on a credit or non-credit basis.

A "community college" generally refers to a two-year institution of higher education that offers different levels of instruction adapted to fit the needs of the community. Community colleges are characterized by open, equitable admissions policies, a community-based philosophy, lower tuition and fees than comparable four-year programs, and a high-quality education. Community colleges offer a wide range of academic programs. Many students enroll to obtain an associate's degree, and sometimes subsequently transfer to a four-year college or university. However, community colleges also provide basic adult education, English as a second language (ESL) instruction, developmental and remedial coursework, and certificate courses. They serve an important economic development role through workforce training programs in continuing education and worker retraining, as well as industry partnerships to attract new employers. As locally governed institutions, community colleges are highly responsive to the needs of industry in their area, and work diligently to fulfill state workforce development plans and strategies. The programs they choose to offer or sustain are almost always guided by a consultation process involving local employers, state officials, faculty, and other institutions of higher education. The mission of public institutions seeking to closely match their program offerings to community needs may occasionally differ from federal priorities.

The State and Federal Role in Accreditation

For its historic role in determining program quality, accreditation has been used by the federal government as a key requirement for participation in federal student aid programs. Community college students have looked to accreditation as a means to judge the legitimacy of college programs. Accreditation also plays a role for employers, who have used it to evaluate the credentials of prospective employees and whether to provide education-related employee benefits. At the same time, the current system of accreditation that operates between both regional and national accrediting authorities with varied requirements and processes has resulted in confusion for many students, families, institutions, and taxpayers. And, the threat of losing accreditation – and with it critical federal financial aid resources for students – has motivated many institutions to comply with recommendations that are often extremely difficult to meet.

As the higher education community has turned its attention increasingly towards the success of students who enroll – by completing or transferring more of those who seek a degree, certificate, or credential – so, too, have accreditors of community colleges focused on the outcomes of students at these institutions. Unfortunately, the severity of state budget crises has constrained the resources that community colleges need to dramatically alter student retention, completion, and transfer rates. Between the 2007-08 and 2010-11 academic years, state funding for community colleges on an FTE basis declined from \$4,578 to \$3,430. Course offerings have declined, student to advisor ratios have increased, and support services are oversubscribed. This type of disinvestment places enormous strains on the entire community college system and has restricted or constrained course offerings and students' ability to access needed courses for degrees and certificates.

Institutions Value Quality Educational Offerings

Still, institutions can and must do more to improve the factors that are under their control. Financial accountability, leadership, and governance deficiencies are rightfully addressed by accreditors. These areas are also a significant focus for ACCT, which works to help boards of trustees understand the importance of data-driven governance, self-evaluation, and strategic partnerships to produce high-quality educational opportunity for their states and communities.

As the investment of the federal government in student financial aid has increased, and helped send millions more students to college, there has also been an increased desire to safeguard taxpayer dollars and the public trust. To this end, community college boards operate transparently and fully support the disclosure of evaluations, documents, financial reporting, and other data regarding institutional performance. We support the disclosure of similar materials by accreditors.

Publicly accessible information and evaluations could also help facilitate communication across the elements of the triad. Wherever possible, the federal government should share its own data and analysis (i.e. regarding institutional financial responsibility, or program earnings information) to assist accreditors in their reviews. Students need clear, concise, and usable information that enables them to make optimal decisions about the college and program that best suits them. The federal government needs to improve upon its vital role in ensuring that students and consumers receive accurate information about institutions and their programs.

Removing Barriers to Transfer and Innovation

Data have shown that community college students who are able to transfer from a community college on to a baccalaureate program have been largely successful, with over 60 percent of students transferring from a two-year institution going on to complete a four-year degree within six years. Unfortunately, too many students have found the transfer of their credits from one institution to the next to be a significant barrier to this process. The lack of effective transfer policies or articulation agreements often forces students to bear increased costs and time-to-degree. Instead, Congress should work with accreditors to ensure that college programs that fall under the same regional accrediting review entities are treated equally for the purposes of transferring credit.

Accreditors have been entrusted by the federal government with certifying institutions' access to federal student aid. However, in limited instances, accreditors have gone beyond their primary role to verify the quality of education provided, and instead become involved in managing the decision-making of elected or appointed trustees. Congress should be explicit about the role of accreditation in institutional governance.

State boundaries no longer define the delivery and assessment of education, but oversight continues to be conducted in this manner. As community colleges continue to expand their online and blended learning options, the multiplicity and inconsistency of state regulations in this area may hamper both effective application of quality standards and educational diversity and innovation. Instead, the federal government should support voluntary efforts like the State Authorization Reciprocity Agreement (SARA) to safeguard distance education students and

provide them with greater access to the courses they need, as well as to protect state and institutional interests.

Finally, accreditors have also sometimes been constrained by federal government definitions and classifications of programs. Overly prescriptive definitions of the “clock hour” have previously denied institutions the ability to offer flexible, competency-based, direct assessment programs. These types of programs are showing early promise at reducing the seat-time necessary for students to demonstrate learned competencies. The federal regulatory ban on using Title IV, program funds for remedial coursework offered by direct assessment is improper, and is instead more appropriately governed by the accreditation process.

ACCT looks forward to working with Congress in the HEA reauthorization process to strengthen critical federal programs and policies affecting community colleges and their students. Improvements in this essential legislation will enable community colleges to help prepare millions of students for academic, professional, and personal success in the 21st century.

Sincerely,

A handwritten signature in black ink that reads "J. Noah Brown". The signature is written in a cursive style with a long horizontal flourish at the end.

J. Noah Brown
ACCT President and CEO