

April 24, 2015

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

Dear Chairman Alexander:

The National Association of State Directors of Career Technical Education Consortium (NASDCTE) and the Association for Career and Technical Education (ACTE) would like to submit the following comments on the Committee's recently released staff white paper titled *Higher Education Accreditation: Concepts and Proposals*. Our organizations represent the broadest spectrum of the career and technical education (CTE) community with regards to secondary, postsecondary, and adult CTE throughout the country.

While higher education accreditation is not an issue that has traditionally been a priority for our organizations' federal policy work, numerous concerns have surfaced recently related to accreditation and its link to federal student aid for CTE programs.

As our members have attempted to design innovative career pathway programs for students and help them more efficiently and effectively navigate the postsecondary education system, they have clearly experienced firsthand the challenges described in the Higher Education Accreditation paper, particularly in subsection B, "Accreditation Can Inhibit Innovation and Competition."

In a number of our state CTE systems, some postsecondary CTE programs are offered at area CTE centers, or other forms of non-degree-granting postsecondary institutions. These institutions are fully accredited and offer programs that are Title IV eligible, but their programs lead to postsecondary certificates instead of degrees. Because of this, they are often accredited by different entities than the degree-granting institutions in their states.

As the labor market and the country's economic needs have shifted, many area CTE centers have sought to partner with two-year degree-granting institutions to offer seamless articulated pathways for students, leading to stackable credentials, including an associate degree.

These pathways reduce burden on students and institutions and represent best practices in postsecondary career and technical education. However, we have heard from a number of institutions that have started to face challenges related to the accreditation of such articulated programs and the transfer of credit from non-degree-granting institutions to degree-granting institutions. These challenges have the potential to stymie innovation and are further exacerbated due to the links between accreditation and an institution's ability to offer student aid.

For example, for many years, Oklahoma Technology Centers have offered full-time health-related programs that are nationally accredited by third-party entities and lead to industry-recognized certification/licensing. Over time, the licensure/certification requirements in some of the areas have changed to include the provision of a degree. In Oklahoma, the Technology Centers are public, non-profit institutions and offer “eligible programs” that meet U.S. Department of Education criteria to qualify for student financial assistance programs. But, because Oklahoma Technology Centers are not considered to be degree-granting institutions, for those areas that require students to earn a degree, they have established partnerships with local two-year colleges allowing them to jointly provide students the education they need in order to be successful.

Recently, the Higher Learning Commission (HLC) (which accredits the degree-granting colleges in Oklahoma) ruled that these partnerships are no longer acceptable due to the amount of content within the articulated degree program being offered by the Technology Center. While the original rationale of the accreditor referenced the U.S. Department of Education’s requirements regarding accreditation and student aid eligibility, further conversations have left this unclear. It is possible that the issue is actually an incorrect interpretation of accreditation rules, or merely the independent decision of the accreditor.

Regardless of the exact reason, this case presents a clear rationale for a simple, fairer accreditation process that recognizes the innovative delivery models that make up today’s higher education system. Federal law should not arbitrarily make quality distinctions between institutions merely on the basis of whether they award degrees or not, and should not allow accreditors to make such arbitrary distinctions either. The accreditation process should be simpler and more transparent. Reforms mentioned in the paper, including repealing some accreditation guidelines, permitting flexibility and nuance, and even delinking accreditation from financial aid, have the potential to address these issues, depending on the structure of other legislative provisions.

In addition, any work done to establish new pathways to accreditation and/or title IV eligibility for non-college providers of higher education should take into account the need for students to transfer credits or credentials from one type of institution or provider to another. Accreditation processes should be flexible enough to account for innovative programs and allow students to continue their education toward more traditional credentials without the fear that they, or their institution, will be unduly penalized by accreditors or the student financial aid system.

We look forward to working with you and the rest of the HELP Committee in the coming weeks and months as you consider the reauthorization of the Higher Education Act. Should you have any questions about our comments or positions, please feel free to contact Steve Voytek (svoytek@careertech.org), NASDCTEc’s Government Relations Manager, or Mitch Coppes (mcoppes@acteonline.org), ACTE’s Legislative and Regulatory Affairs Manager.

Sincerely,



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