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Statement by

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Before the  
Subcommittee on Postsecondary Education  
Committee on Education and Labor  
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Mr. Chairman and Members of the Subcommittee:

I am Ernest Boyer, president of the Carnegie Foundation for the Advancement of Teaching. I wish to thank the committee for inviting me to meet with you today.

I am pleased to discuss briefly a recent report on the governance of higher education prepared by The Carnegie Foundation. This report entitled, The Control of the Campus, asks: How can colleges and universities maintain their independence while being answerable to the various constituencies they serve?

We conclude that, in the strictest sense, there is no such thing as autonomy in higher education. And we suggest that it is irresponsible for educators to take public money or private funds and then complain when asked to be accountable for such support.

The key issue then is not whether colleges and universities can be detached from the world of which they are inevitably a part. Rather, the issue is where the line should be drawn between the campus and the state and, most especially, how can we separate out trivial interference from essential confrontation.

We conclude that in the end, the academy must be given full authority over what we call in our report the essential core: the selection of faculty, the conduct of courses and research, the processes of instruction, the establishment of academic standards, and the assessment of performance.

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That recitation may sound unusually familiar, but these functions constitute the core of academic life, and it is here--at these points--that the independence of the campus must be uncompromisingly defended by faculty, the president, and by the governing board, which stands as a shield between the campus and the constituencies beyond.

Having defined the basic ground rules of academic governance--we then move in our report, to the issue of whether the integrity of higher education has, in fact, been violated by the state, or federal government, or the courts.

Putting it simply, has government been as bad as we have all believed?

Here, I must warn that our conclusion will be a keen disappointment to those who have a "conspiratorial" view of academic history. We found--during our two-year study--few examples where public officials have tried overtly to control the essential functions of teaching and research.

And, in fact we consider it a remarkable achievement that so much public money has been channeled to the nation's public and private campuses with so little interference.

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I.

Accreditation: The Federal Connection

Mr. Chairman, there are however, several issues raised in our report that I should like to focus on today. The first, is accreditation.

In 1944, Congress passed the Servicemen's Readjustment Act, the so-called G.I. Bill. Under this law, Veterans were entitled to education benefits if they attended institutions "approved" by state education agencies--but no one was quite sure what it meant to be approved.

The Veterans' Administration had no authority to tell states how to carry out this responsibility. As a result, fly by night programs were accredited. Shocking stories of scandal and abuse began to circulate in Congress.

In 1952, the rules were tightened. Congress directed the United States Commissioner of Education to help state agencies determine eligibility by "publishing a list of nationally recognized accrediting agencies and associations which he determines to be reliable authorities as to the quality of training offered by an educational institution." The commissioner's first published list of twenty-eight approved accrediting associations was drawn largely from the National Commission on Accrediting, the umbrella association of accrediting bodies.



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During the past thirty years, the Commissioner's authority to approve accrediting associations has been reaffirmed in at least twenty-five separate statutes. And as accreditation received official blessing, more and more associations sought federal approval. An office called the Division of Eligibility and Agency Evaluation in the United States Office of Education developed detailed criteria to decide which accrediting agencies the government should approve.

By 1982, sixty-four associations--both regional and professional--were on the Commissioner's (now Secretary's) list. Self-regulation in American higher education was formerly backed by the power of the state. The bureaucracy was kept busy evaluating the evaluators. And access to billions of federal dollars is now limited to institutions accredited by agencies on the Secretary's approved list.

Frankly, Mr. Chairman, we conclude that this process has gotten out of hand. The Commissioner, now Secretary of Education, has become, by default, the nation's accreditation czar. Special interest groups push to get on the Secretary's approved list--even though such listing has at times little or nothing to do with determining whether an institution should be eligible to receive federal support. It is inappropriate we feel for the federal government to involve itself in accreditation as an end in itself, a function that takes the Department of Education far beyond the intention of the law, and imposes on it an evaluation activity it is ill equipped to carry out.

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We, therefore, have two very simple recommendations.

- o First, we recommend that in determining the eligibility of colleges to participate in federal programs, the Secretary of Education should use regional accreditation as the basis for approval.
- o We also recommend that--the Council of Postsecondary Accreditation--not the federal government be the agency to prepare the approved list of regional associations. Such an assessment would return us to the procedure that was used by the Commissioner when the first list of approved accrediting associations was established.

I might say parenthetically, Mr. Chairman, that if the Council on Postsecondary Accreditation is given such authority, it must demonstrate its capacity effectively to do the job, and I further believe, that the nation's college and university presidents should become still more actively involved in the work of the Council on Postsecondary Accreditation.

Our concern about government's connection to accreditation is related to concern that specialized accreditation bodies approved by the Department of Education may themselves threaten the integrity of the campus. In fifty years, the list

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of approved accrediting bodies has grown from a small core to sixty-four associations, ranging from the Council for Non-Collegiate Continuing Education to the American Association of Marriage and Family Therapy, to the American Board of Funeral Service Education. Today, on many campuses a dozen or more visiting teams impose requirements that compromise the authority of the trustees and undermine the overall priorities of the institution.

The issue here is not whether professional programs should meet high academic standards. It is, rather, how detailed those standards should be; how they should be enforced; and, most importantly, whether specialized programs to improve their own demands are to fit within the larger purposes of the campus.

Looking ahead, tensions among departments and disciplines may increase as budgets tighten. In such a climate, professionals on campus may be even more tempted to abuse accreditation, using the process not to protect the public and promote excellence but to gain leverage in the competition for dollars.

More ominous is the fact that at least twenty-one associations have now been linked to occupational licensure by the state. Through such arrangements, specialized accrediting bodies--using the authority of their federal recognition--wield enormous power over higher education. They control entry into the professions, and often give states strong influence over academic matters.



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To fit specialized accreditation more effectively into the overall governance of higher education the following recommendations are proposed that depend not so much on the federal connection but on the academy itself:

- o We recommend that standards for specialized accreditation focus on outcomes, and campus evaluations should be conducted with full respect for the overall mission of the institution.
- o We also recommend that colleges and universities not invite to campus any specialized accrediting agency whose criteria for membership are so intrusive or detailed as to weaken an institution's own authority over teaching and research.
- o We further recommend that specialized accreditation teams coordinate their visits with regional associations, and, whenever possible, such collaboration should involve sharing information and preparing combined summary reports.
- o Finally, we recommend that state governments reexamine the link between occupational licensing and specialized accreditation. In some cases, alternate



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routes to licensure, such as formal examinations or practical experience should be provided. In other cases, the link between licensing and accreditation should be broken altogether.

## II.

### Government and The Academy: New Structures

At the outset, Mr. Chairman, I suggested that government has not seriously involved the integrity of higher education. This does not mean, however, that the relationship has been problem free.

I recall during my own tenure as Commissioner, the furor over default on student loans and the subsequent proposal by government to separate eligibility from accreditation which would have put the Office of Education directly in the accreditation business. I also recall the confusion when the Office of Education proposed regulations related to the campus refund policy for students who dropped out. I further recall the debate on how to regulate research on recombinant DNA should the government give researchers a free hand in the information field and did it have a right--indeed a moral obligation--to impose constraints?

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And what about protecting human subjects. Again, does government have an obligation to see to it that federal funded research does not harm participating individuals?

Mr. Chairman, we suggest in our report that even in the best of worlds fundamental questions such as these will be with us always. The governance of higher education is a dynamic not a static issue and we conclude that new government-university forums should be created to improve communication, resolve differences, and to move forward policy recommendations as new important issues are confronted.

- o Specifically, we recommend that the National Academy of Sciences, establish a government-higher education research forum to exchange ideas, search for agreement on research policy and resolve disputes over the administration of existing programs. Such a forum should be organized in consultation with appropriate federal agencies and professional bodies.
- o We also recommend that the American Council on Education, working with the Department of Education, should also establish a government-higher education student assistance forum to exchange ideas, search for agreement on policy, and resolve disputes over the administration of student aid programs. The

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Council should also enlarge the work of its Office of Self-Regulatory Initiatives.

- o Further, we propose that the policy guidelines developed by the American Council on Education's self-regulation project and by the new forums recommended in our report be considered for adoption at every institution of higher learning to which they apply.
- o And finally, we urge that guidelines should be used by accrediting teams to assist in the evaluation of individual campuses.

If federal involvement in higher education has been relatively benign, how is it that there has been, until recently at least, so much complaining about government intrusion? The answer lies, at least in part, in what we call "the cumulative impact." One regulation may not be restrictive, but many regulations quite literally smother an institution.

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III.

Institutional Dependency: A Special Issue

Mr. Chairman, there is one other matter in our report that seems relevant to this hearing.

In assessing the impact of federal student aid on the nation's campuses, we identify one overarching issue.

We note that, today, hundreds of campuses now receive much of their annual revenue from the federal program of student grants or loans.

In 1978, federal student aid funds (excluding guaranteed loans) were equal to about 50 percent of the tuition revenues at public comprehensive colleges and to more than 45 percent of tuition income at public two-year colleges.

At private liberal arts colleges, federal student aid, (again exclusive of guaranteed loans) was equivalent to more than 25 percent of the tuition revenues. In aggregate, this federal support represents about 13 percent of the total income of private liberal arts colleges--a level of dependence that would have startled private college presidents not many years ago.

The governance indications of this dependency are profound. A network of federally-related institutions has been created. Almost all colleges and universities are now to some extent dependent on Washington for survival. And, in the long



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run, this may prove to be the most important governance issue to be faced.

We do not suggest, of course, that federal student aid programs should be restricted. Equal opportunity must continue as the bedrock educational policy of this nation.

But this new interdependent relationship does place a special obligation on government to see to it that the level of support is not abruptly changed. It also means that student aid should not be used to achieve other ends that would place inappropriate burdens on the campus or impose--even indirectly--political or legal or academic obligations that would restrict the institution and threaten the essential core.

Simply stated, in order to keep the governance lines very clear, student eligibility for aid should be based solely on student needs.

The founders of this nation were wise to restrict the role of the federal government in the control of American higher education. The nation's leaders have also been enlightened in recognizing that there are certain educational objectives that can best be served by federal support. Reconciling this important principle--federal support without federal control--has created a need for both vigilance and trust and the development of appropriate governance machinery to handle conflicts as they arise. Our recommendations have been designed to meet this challenge.

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Mr. Chairman, it is in my view, an act of statesmanship that this committee of the House has convened a hearing on the relationship between government and higher education. I commend you and the Committee for your leadership and, once again, I thank you for the opportunity to meet with you today.