



OFFICE OF THE PROVOST AND  
EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

OFFICE OF THE PRESIDENT  
1111 Franklin Street, 12<sup>th</sup> Floor  
Oakland, California 94607-5200

July 11, 2019

Mr. Jean-Didier Gaina  
U.S. Department of Education  
400 Maryland Avenue SW  
Mail Stop 294-20  
Washington, D.C. 20202

Re: Docket ID ED–2018–OPE–0076, RIN 1840–AD36, 1840–AD37, Student Assistance General Provisions, the Secretary’s Recognition of Accrediting Agencies, the Secretary’s Recognition Procedures for State Agencies

Dear Mr. Gaina:

The University of California appreciates the opportunity to comment on the Department of Education’s proposal to “amend the regulations governing the recognition of accrediting agencies” as described in the June 12, 2019 Federal Register. Our comments are generally limited to the proposed changes to Rule 602.11 (Geographic Area of Accrediting Activities) that would “transition from the concept of an accrediting agency’s ‘geographic scope’ as determined by the Department, to one of ‘geographic area’ as reported by the agency and reflecting all States in which main campuses, branches and locations accredited by the agency are located.”

It is the University’s position that the system of regional accreditation is in part responsible for the excellence of American higher education.

First, the University of California supports accreditation remaining regionally organized as this system allows accreditors to be able to understand the larger contexts (in terms of educational mission and policy structures) associated with institutions in their regions. This understanding, in our case, has supported an alignment between the institutional missions of our campuses and the policies and emphases of our regional accreditor. Given this understanding and alignment, it is our position that high standards of excellence and commitments to institutional improvement and student success are a more likely outcomes from a regional approach.

Second, the University is skeptical of the notion that “competition” would add value to the organization of accreditation. While competition may possibly lower costs, it is equally possible that it would lower standards. Creating a system in which accreditors compete for clients positions accreditors as service providers and, thus, as less independent of the institutions they are accrediting. If such a development led to lower standards, it could put at risk the excellence of American higher education.

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Third, the University is not sure what problem this change is addressing. If it is intended to address the transfer of credit among institutions, it is the University of California's position that the credit transfer process among institutions with regional accreditation is well established. The University of California already accepts transfer credits from other regionally-accredited institutions, wherever they are located.

Given that there is not a strong reason to make this change and there is a likelihood that this change would dilute quality accreditation rather than strengthen it, we would urge the department to withdraw the change in Rule 602.11 that would remove "geographic area of accrediting activities" from the definition of "scope of recognition or scope" of accrediting activities.

Sincerely,



Susan L. Carlson  
Acting Provost and  
Executive Vice President for Academic Affairs

cc: University of California President, Janet Napolitano  
University of California Federal Government Relations Associate Vice President Chris Harrington  
U.S. Secretary of Education Betsy DeVos