



Northwest Commission on Colleges and Universities
8060 165th Avenue NE
Suite 100
Redmond, WA 98052

March 30, 2019

Dear President Ramaswamy,

The University of Oregon applauds NWCCU for engaging in a substantive review and revision of the Eligibility Requirements and Standards for Accreditation (standards). We appreciate that as a part of NWCCU's review and renewal by the National Advisory Committee on Institutional Quality and Integrity and the U.S. Department of Education, a fresh look at the Eligibility Requirements and standards were warranted with an eye toward a more risk-based approach, and focus on the learning and outcomes of students.

Among the newly proposed standards, there are many elements that we enthusiastically support. We support the clear priority given to student achievement and success. We also sincerely appreciate the effort to move from a compliance-based evaluation to a more clear opportunity to focus on institutional improvement. We believe alternative pathways and risk-based accreditation better recognize the diversity of the institutions accredited by NWCCU and the unique capacity of each institution. We experienced this benefit firsthand through our participation in the Demonstration Project in 2017, and we believe that allowing institutions to transfer the considerable energy required of a comprehensive self-evaluation toward meaningful issues specific to our mission and goals is a considerable improvement.

The Council for Higher Education Accreditation (CHEA) lists four main reasons why accreditation is important:

- "Students who want federal (and sometimes state) grants and loans need to attend a college, university, or program that is accredited.
- Employers ask if a college, university, or program is accredited before deciding to provide tuition assistance to current employees, evaluating the credentials of new employees, or making a charitable contribution.
- The federal government requires that a college, university, or program be accredited in order to be eligible for federal grants and loans or other federal funds.
- State governments require that a college, university, or program be accredited when they make state funds available to students or institutions and when they allow students to sit for state licensure examinations in some professional fields."

We agree with NWCCU that accreditation is important to students as an indicator of quality and in determining an institution's eligibility to award student aid under Title IV of the Higher Education Act. We do not believe, however, that accreditation is *only* about students. Regional accreditation has become the primary vehicle in the United States to signal that an institution is fiscally sound, well managed, and high quality with respect to the education of its students, its faculty research when that is part of its mission, and its place in the overall system of



higher education. Accreditation also serves as the gateway for other aspects of a research university's mission and provides access to myriad research funding opportunities.

As you are aware, the University of Oregon is recognized in the Carnegie Classification of Institutions of Higher Education as one of only 131 "Doctoral Universities: Very High Research Activity," commonly referred to as R1 institutions. In FY 2017, the University of Oregon had \$111.1 million in sponsored project research expenditures. As CHEA noted, the federal government uses accreditation as a minimum-eligibility requirement for grants given to institutions of higher education. For example, the National Science Foundation's Proposal Preparation and Submission Guidelines (guidelines) state that only "two- and four-year IHEs (including community colleges) accredited in, and having a campus located in the U.S., acting on behalf of their faculty members¹" are eligible to submit grant proposals.

A critical component of research is that the faculty to have full freedom over what research is conducted. NSF's guidelines specifically state that grant submissions can only be done by an institution "on behalf of their faculty members," meaning that an institution cannot determine or limit what research faculty pursue. Academic freedom is a core higher education principle that was established officially in 1915 by the Committee on Academic Freedom and Academic Tenure of the American Association of University Professors (AAUP). While the original statement has undergone revisions, it has maintained its fidelity to the concept that academic freedom "applies to both teaching and research. Freedom in research is fundamental to the advancement of trust. Academic freedom in its teaching aspect is fundamental for the protection of the rights of the teacher in teaching and of the student to freedom in learning²."

The proposed standards have removed any reference to academic freedom. **We respectfully ask that the following existing standards be retained in the revisions** (but adjusted accordingly to account for other proposed changes such as the deletion of core themes):

- **Existing Standard 2.A.27** – The institution publishes and adheres to policies, approved by its governing board, regarding academic freedom and responsibility that protect its constituencies from inappropriate internal and external influences, pressures, and harassment.
- **Existing Standard 2.A.28** – Within the context of its mission, core themes, and values, the institution defines and actively promotes an environment that supports independent thought in the pursuit and dissemination of knowledge. It affirms the freedom of faculty, staff, administrators, and students to share their scholarship and reasoned conclusions with others. While the institution and individuals within the institution may hold to a particular personal, social, or religious philosophy, its constituencies are intellectually free to examine thought, reason, and perspectives of truth. Moreover, they allow others the freedom to do the same.

It is critical that both of these standards be included as they work together. The AAUP effectively explained this in its 2011 guidance on *Ensuring Academic Freedom in Politically Controversial Academic Personnel Decisions* which states, "Current political threats to academic freedom have intensified with the rapid growth of the Internet and

¹ The NSF guidelines can be found at: https://www.nsf.gov/pubs/policydocs/pappg19_1/pappg_1.jsp#IF

² Taken from AAUP's "1940 Statement of Principles on Academic Freedom and Tenure with 1970 Interpretive Comments"



new media that have made it possible for talk-show hosts, bloggers, and well-funded interest groups to supplement the trustees, politicians, corporate and religious groups, and journalists who previously put untoward pressure on the university. At the same time, the need for faculty members to contribute their expertise to public discourse and policy debates has increased. The protection of their unfettered expression, including the ability to espouse highly controversial and unpopular views, is an essential social responsibility of universities and colleges.” Academic freedom must be included in our standards so that we continue hold each other accountable to this core principle.

The proposed changes state that:

“The Standards for Accreditation are statements that articulate the quality, effectiveness, and continuous improvements expected of accredited institutions. The Standards serve as indicators by which institutions are evaluated by peers through a process of self-reflection and evaluation that blends analysis and synthesis into a holistic examination of the institution’s ability to fulfill its mission, deliver quality education, and promote student achievement.”

The eligibility requirements are explained as:

“The Northwest Commission on Colleges and Universities requires that all of its member and candidate institutions be degree-granting institutions whose mission is focused upon excellence in higher education and that meet the following Eligibility Requirements. Failure to adhere to meet any Eligibility Requirement may lead to the imposition of a sanction, adverse action, or denial of authorization of a candidate institution.”

We appreciate that academic freedom remains in the draft eligibility requirements, requiring that “the institution maintains an atmosphere in which intellectual freedom and independence exist. Faculty and students are free to examine and test all knowledge appropriate to their discipline or area of major study as judged by the academic/educational community in general.” However, the draft eligibility requirements also include statements on academic quality and student achievement. These two areas are covered much more in-depth in the proposed standards themselves. As such, there must be different meaning attributed to the eligibility requirements and the standards, otherwise there would be no need for duplication between the two. It is our assumption that inherent to the standards is a greater sense of the values we hold as a higher education community. In that regard, we agree that the standards should include a strong focus on students. However, we disagree that other values should then be omitted. Academic freedom is a value critical to our history in higher education that must also be recognized in our standards. If we are misunderstanding the importance of an item being included in the standards, we would appreciate a better articulation from NWCCU of the differences between the eligibility requirements and the standards.

In addition, we are concerned about the minimal references to the importance of faculty in sharing the governance responsibilities for institutions, and the reduced voice given to students in decision-making and processes in the proposed standards. As noted by the AAUP in its *Statement on Government of Colleges and Universities*:

“The variety and complexity of the tasks performed by institutions of higher education produce an inescapable interdependence among governing board, administration, faculty, students, and others. The



relationship calls for adequate communication among these components, and full opportunity for appropriate joint planning and effort. Joint effort in an academic institution will take a variety of forms appropriate to the kinds of situations encountered. In some instances, an initial exploration or recommendation will be made by the president with consideration by the faculty at a later stage; in other instances, a first and essentially definitive recommendation will be made by the faculty, subject to the endorsement of the president and the governing board. In still others, a substantive contribution can be made when student leaders are responsibly involved in the process. Although the variety of such approaches may be wide, at least two general conclusions regarding joint effort seem clearly warranted: (1) important areas of action involve at one time or another the initiating capacity and decision-making participation of all the institutional components, and (2) differences in the weight of each voice, from one point to the next, should be determined by reference to the responsibility of each component for the particular matter at hand, as developed hereinafter.”

The current standards appropriately recognize these different roles and responsibilities. Existing standard 2.A.1 states:

“The institution demonstrates an effective and widely understood system of governance with clearly defined authority, roles, and responsibilities. Its decision-making structures and processes make provision for the consideration of the views of faculty, staff, administrators, and students on matters in which they have a direct and reasonable interest.”

However, this standard has been weakened in the proposed revisions with the removal of the other constituencies, instead relegating them to “related entities that have clearly defined authority, roles, and responsibilities.” **We respectfully ask that existing standard 2.A.1 be maintained in its entirety.**

We thank the NWCCU for the opportunity to comment on these proposed changes. As you move forward with the revisions, and consistent with our suggestion to maintain the original 2.A.1, we encourage you to engage directly with faculty. Statewide, Oregon has several faculty organizations that have many important insights to consider, including AAUP-Oregon and the Interinstitutional Faculty Senate, which is recognized by the state’s Higher Education Coordinating Commission as the representative of the faculty of the public universities.

We look forward to seeing the next round of revised standards.

Sincerely,

Jayanth Banavar

Provost and Senior Vice President
University of Oregon