

June 15, 2010

Council for Higher Education Accreditation
One Dupont Circle NW
Suite 510
Washington, DC 20036

Dear CHEA:

On behalf of the 120 member institutions, the American Association of Colleges of Pharmacy (AACCP) provides the following comments to the Council for Higher Education Accreditation (CHEA) in regard to proposed changes to its recognition policy and procedures. In general, like CHEA, AACCP is committed to working with all stakeholders to advance academic quality. Toward that end we work collaboratively with the Accreditation Council for Pharmacy Education (ACPE) to regularly bring examples of educational excellence identified during its accreditation site visits to all AACCP member institutions.

Therefore, we share the commitment of CHEA to ensuring that all accrediting organizations are equally engaged in advancing educational quality, are accountable for their decisions, and continually work to improve their work. Yet the CHEA commitment, as expressed in its proposed changes to the 2006 CHEA Recognition Policy and Procedures, as revised on April 1, 2010 and further revised on June 2, 2010, places our shared commitment in jeopardy. In general, the proposed changes far exceed the responsibility of CHEA to effectively ensure the quality of its member accrediting organizations.

Specifically AACCP asks CHEA to reconsider its proposed changes regarding:

1. Eligibility Standard 9: The proposed change should be rejected. We are unclear as to the authorization of CHEA to require any compliance with the proposed change regarding non-U.S. institutions. Therefore, CHEA should remove this proposed change from its final document.
2. Recognition Standard 12B (5): The proposed change should be rejected. Proposing that accrediting organizations “inform the public of final decisions to grant, reaffirm, deny or withdraw accreditation accompanied by a description of the basis for these decisions” is overreaching and provides the public with potentially confusing information from which to draw conclusions of academic quality among institutions. The current policy is sufficient to safeguard the public in a timely and succinct manner.
3. Recognition Standard 12B(9): The proposed change should be rejected. We are unclear as to how CHEA can mandate accrediting organization control of non-U.S. institutions.
4. Recognition Standard 12B(10): The proposed change should be rejected. Any accrediting organization with CHEA or U.S. Department of Education recognition already, by virtue of that recognition, proclaims the harm of degree mills and accreditation mills. This is a redundant standard that adds nothing to protect the public.

5. Additional Provisions: The proposed change should be rejected. The proposed change to insert CHEA into an ongoing relationship between an accrediting organization and an institution that it accredits is over-reaching, appears as a conflict of interest, and therefore outside the appropriate activities of an organization that grants status to accrediting organizations.

Again let us state our sincere desire to work with all stakeholders to advance academic quality. In regard to health professions education there is a very real public interest to protect in doing so. We ask that CHEA respectfully consider our recommendations for improving their recognition policy and stand prepared to engage in a mutual discussion of resolution so that the public might be best served.

Sincerely,

A handwritten signature in black ink that reads "Lucinda L. Maine". The signature is written in a cursive, flowing style.

Lucinda L. Maine, PhD
Executive Vice President and CEO
American Association of Colleges of Pharmacy