



June 12, 2017

Jennifer Hong, Executive Director/Designated Federal Official
National Advisory Committee on Institutional Quality and Integrity (NACIQI)
U.S. Department of Education
400 Maryland Avenue SW., Room 6W250
Washington, DC 20202

Submitted via email to ThirdPartyComments@ed.gov

RE: Written Statement: Comment Addressing NACIQI's Authority under the Higher Education Act of 1965 (HEA), Sec. 114

Dear Ms. Hong:

Please accept these comments on behalf of the Academy of General Dentistry (AGD). With a membership of 40,000, the AGD is the second largest dental association in the United States, and the only organization dedicated solely to the representation of general dentists and the patients they serve.

Sec. 114 [20 U.S.C. 1011c], subsection (c)(1) states that the NACIQI shall "advise the Secretary with respect to establishment and enforcement of the standards of accrediting agencies or associations under subpart 2 of part H of title IV." Emphasis added.

This Written Statement of the AGD is limited to addressing this subsection generally, and does not pertain to any particular agencies whose renewal of recognition shall be under consideration at the June 20, 2017, meeting of the NACIQI.

With respect to Sec. 114(c)(1), the AGD respectfully submits two comments:

1. Establishment of the standards of accrediting agencies or associations must not precede the satisfaction of the agencies' or associations' prerequisites for the establishment of the educational programs that would seek accreditation through the accrediting agencies or associations. For example, if an accrediting agency establishes prerequisite eligibility criteria, such as a requirement for evidence of need and support from the public and professional communities to sustain educational programs in the discipline, then the existence of only one or two newly-founded educational programs in one or two states would be considered insufficient evidence to establish *national* accreditation standards.

When standards are established before the educational programs prospectively seeking accreditation are truly established, it is tantamount to the accrediting agencies or associations acting as legislators to create professions in states that do not otherwise recognize the

Your voice for excellence through education and advocacy

professions, and as academia to establish programs that may not exist but for the premature establishment of standards. It is the cart driving the horse, and the establishment of standards for untested or experimental programs only serves to dilute the function of the accrediting agencies or associations.

2. Enforcement of the standards of accrediting agencies or associations must include ongoing review of the accredited programs for success with respect to student and graduate achievement that is consistent with the intent of the earned degree or credential awarded upon completion of the educational programs. Such review should include monitoring to ensuring the achievement of gainful employment upon graduation, at a financial level commensurate with the goals of the accredited program.

On behalf of the AGD, I thank you for the opportunity to provide the above comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maria".

Maria A. Smith, DMD, MAGD
President, Academy of General Dentistry

Cc: Daniel J. Buksa, JD, CAE, Interim Executive Director & Associate Executive Director,
Public Affairs, Academy of General Dentistry