

————— Council of —————
Regional Accrediting Commissions

April 21, 2020

The Honorable Betsy DeVos
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC. 20202

Dear Secretary DeVos:

On behalf of the Council of Regional Accrediting Commissions (C-RAC), I write regarding the Department's March 5, 2020 guidance and subsequent April 3, 2020 "UPDATED [Guidance](#) for Interruptions of study related to Coronavirus (COVID-19)." We are pleased that, as part of this guidance, accreditors are permitted to waive their distance education review requirements to enable institutions to provide distance learning opportunities for the purpose of serving their students who were already in attendance at the start of the COVID-19 national emergency.

Given the uncertainty that lies ahead, we urge you to expeditiously extend this critical flexibility through the 2020-21 academic year to allow institutions to make critical planning decisions necessary in the coming weeks.

As new and returning students begin to enroll in summer and fall programs, institutions need to know they will continue to have this flexibility moving forward. To prepare for multiple complex scenarios, they need maximum assurance that they can continue their programs in ways that best serve students. The most obvious situation is in the event that in-person classes are not possible due to continued state or local social distancing policies, which some estimate could extend into 2021. Even if on-site education is possible, some or many students may not be able to be present due to financial limitations, family responsibilities, or high-risk health conditions that make distance options the only way to continue their education. Physical distancing policies may make hybrid learning options essential.

The decisions and plans colleges, universities, and systems need to make in these uncertain times should not be further burdened by unnecessary worries about effective dates of federal or accreditor rules. At least one large system has told us they have fall terms that start as late as October 1. Institutions and systems are revamping curricula, adapting staffing and scheduling, developing networks to share programming, and managing myriad details of allowable on-campus populations and use. They need as much reassurance possible that they can proceed in educationally responsible ways with the flexibility their accredited status and educational missions deserve. Students deciding whether to return to or continue college will want to know the offerings for the full academic year or program, and their schools need to know whether they can safely plan for remote offerings far beyond June 1 or even the fall term.

As accreditors, we each have been swift to provide this necessary flexibility under our own standards and policies. Over the last two months, accreditors have adopted new policies and procedures, or waived existing ones, where necessary to provide rapid approval of distance education programs for institutions that are working to accommodate students whose enrollment is interrupted as a result of COVID-19. We also want to assure the Department that we each take very seriously our responsibility to oversee the integrity of institutions as they move their programs online. This includes

making sure that every institution understands its responsibilities under federal requirements related to distance education.

Again, C-RAC thanks the Department for providing the necessary guidance and flexibility to enable accreditors to work with institutions as they navigate these unprecedented times, and we strongly urge this flexibility to be continued for the foreseeable future.

Sincerely,

A handwritten signature in black ink that reads "Barbara Gellman-Danley". The signature is written in a cursive, flowing style.

Barbara Gellman-Danley, Ph.D.
Chair, Council of Regional Accrediting Commissions
President, Higher Learning Commission (HLC)

cc:

Chairman Lamar Alexander
Ranking Member Patty Murray
Chairman Bobby Scott
Ranking Member Virginia Foxx