



Middle States Commission on Higher Education

3624 Market Street, Philadelphia, PA 19104 Tel: 267-281-5000 www.msche.org

March 4, 2019

The Honorable Andrew M. Cuomo
Governor of New York State
New York State Capitol Building
Albany, NY 12224
Sent via email: Governor.Cuomo@exec.ny.gov

Dear Governor Cuomo:

I am writing on behalf of the Middle States Commission on Higher Education (MSCHE) to urge reconsideration of a portion of the proposed education law known as the *New York State For-Profit Accountability Act*. More specifically, I wish to address the portion of the proposed legislation that concerns the ability of senior staff and board members from for-profit institutions to serve on the board of any regional or national accrediting agency.

MSCHE is the regional accrediting agency that is recognized by the United States Department of Education to serve the Mid-Atlantic area including New York State. This agency accredits approximately 525 postsecondary degree granting institutions at all levels, representing all sectors of higher education including public, private non-profit, and private for-profit institutions. For-profit institutions have been included in our membership for many years. MSCHE uses a single set of accreditation standards that are applied to the evaluation of all member institutions regardless of the sector involved. All member institutions must be able to demonstrate compliance with those standards as well as with the Commission's requirements of affiliation, policies and procedures, and federal compliance requirements.

The twenty-nine (29) member Commission is the decision-making body, comprised of institutional and public representatives, that acts on each and every accreditation. In order to reach fair, equitable, and consistent decisions, the Commission has worked to ensure broad representation from all sectors of higher education, including for-profit institutions, to serve as members of the Commission. MSCHE has been fortunate to have excellent commissioners from the for-profit sector who contribute deep knowledge of the sector and have provided essential service that is highly valued by colleagues.

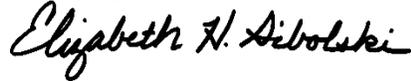
Currently, Dr. Francis Felser, President of Bryant & Stratton College, serves as a Commissioner as well as President of the Middle States Association of Colleges and Schools (the collective commissions representing K-12 and higher education). In addition, Mr. David Rhodes, President of the School of Visual Arts, previously served as a member of the Commission, including in the important roles of an Executive Committee member, Treasurer, and Chair of the Commission's Finance Committee. The Commission's experience and knowledge base would be incomplete

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without the services provided by these institutional representatives, and the Commission's capacity to serve students and the public through quality assurance would suffer without this sector represented on the Commission.

Once again, I urge that you reconsider the proposed legislation that would unnecessarily prohibit representatives of for-profit institutions from serving on the Middle States Commission on Higher Education. If there are questions about this letter or if I might be of additional assistance, please do not hesitate to be in touch with me. I can be reached by telephone at 267-284-XXXX or by email at XXXXXXX@msche.org.

Sincerely,



Elizabeth H. Sibolski, Ph.D.
President, Middle States Commission on Higher Education

cc: New York State Education Department, Board of Regents, Chancellor Betty A. Rosa
New York State Education Department, Commissioner of Education MaryEllen Elia