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A primer on higher education accreditation.

Accreditation is the process of recognizing that an institution of higher education meets established standards, including a general standard of quality. In the United States, non-governmental organizations recognized by the Secretary of Education conduct the peer-review accreditation process for colleges and universities and their programs.

This overview provides a history of higher education accreditation, discusses the purposes and uses of accreditation, describes the process of accreditation and types of accreditors, and reviews current and emerging issues in accreditation.

A Short History of Accreditation

As the number of educational institutions grew in the 1800s, it became increasingly difficult to distinguish between secondary schools, colleges, and their respective educational offerings. At that time, there was little government oversight of higher education, so colleges and universities took it upon themselves to create voluntary, non-governmental organizations to provide standards to distinguish them from secondary schools. The first of these organizations was the New England Association of Colleges and Secondary Schools (now called the New England Association of Schools and Colleges), which was founded in 1885. By 1923, with the founding of the Western Association, the nation was fully covered by six regional accreditors, each tasked with accrediting colleges and universities in its respective region.

Although higher education accreditation has existed since the late 1800s, the federal government had little interest in the process until the early 1950s, when federal investments in postsecondary education dramatically increased. In 1944, Congress passed the Servicemen’s Readjustment Act of 1944 (more commonly known as the GI Bill), which provided federal education benefits for returning veterans. Based on the popularity of this bill, Congress passed the Veterans’ Readjustment Assistance Act of 1952 (also known as the Korean GI Bill), which increased federal education benefits previously available to veterans in the original GI Bill.

To prevent these funds from going to poor-quality providers of higher education, Congress determined that it needed a system to ensure a basic level of quality for institutions receiving federal dollars. To meet this need, the federal government turned to the existing system of accreditation — one that is private and voluntary. Using a non-governmental private actor to conduct institutional assessments avoided the need for the government to oversee and judge the quality of institutions directly.

Under the Veterans’ Readjustment Act of 1952, the U.S. Commissioner of Education was authorized “to publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution…” This list was used by state approval agencies to determine the schools at which veterans could use their GI education benefits. When the federal government began providing financial support for college to students beyond veterans, Congress continued to rely on accreditation as a basic quality check for receipt of federal funds.

With passage of the Higher Education Act of 1965, Congress deemed as eligible for federal funding an institution of higher education that was “accredited by a nationally recognized accrediting agency or association or, if not so accredited, is an institution whose credits are accepted, on transfer, by not less than three institutions which are so accredited, for credit on the same basis as if transferred from an institution so accredited.” Carrying this accreditation eligibility criterion into subsequent reauthorizations of the Higher Education Act, Congress cast the voluntary system of accreditation into the role of primary gatekeeper for federal higher education funds.
Although Congress has added additional institutional eligibility criteria over the years (e.g., standards for fiscal responsibility, cohort loan default rates) accreditation remains the key eligibility criterion for access to federal student loans and grants under Title IV of the Higher Education Act.

## Major Changes to Federal Financial Aid and Accreditation

<table>
<thead>
<tr>
<th>Law</th>
<th>Changes to federal aid</th>
<th>Requirements to receive aid</th>
</tr>
</thead>
<tbody>
<tr>
<td>Servicemen's Readjustment Act of 1944 (GI Bill)</td>
<td>Provided federal education benefits for college as well as vocational, on-the-job and on-farm training with little oversight.</td>
<td>State agency approval.</td>
</tr>
<tr>
<td>Veterans’ Readjustment Assistance Act of 1952 (2nd GI Bill)</td>
<td>Provided federal education benefits for veterans with increased oversight.</td>
<td>Required accreditation or proof that credits were accepted by three accredited schools for public and nonprofit schools. Unaccredited schools had to apply and be approved by state agencies through a lengthy process.</td>
</tr>
<tr>
<td>Higher Education Act of 1965</td>
<td>Provided grants and loans to all students at public and nonprofit schools.</td>
<td>Required accreditation or proof that credits were accepted by three accredited schools for public and nonprofit schools. Unaccredited public and nonprofit schools had to be making reasonable progress toward accreditation, as determined by the commissioner of education.</td>
</tr>
<tr>
<td>National Vocational Student Loan Insurance Act of 1965</td>
<td>Provided loans to students at vocational schools.</td>
<td>Required accreditation, certification by state agency, or committee established by the commissioner of education if no agency existed.</td>
</tr>
<tr>
<td>Higher Education Act Amendments of 1972</td>
<td>Provided grants and loans to all students at public and private nonprofit and for-profit schools; increased federal grant aid.</td>
<td>Required accreditation or reasonable progress toward accreditation. Public and nonprofit schools could show proof that credits were accepted by three accredited schools in lieu of accreditation.</td>
</tr>
</tbody>
</table>
## Purposes and Uses of Accreditation

Accrediting agencies and associations have developed criteria and standards based on core values that their member institutions must meet to become and remain accredited. From these core values also flow the purposes and uses of accreditation. The system of accreditation purports to perform a variety of functions, including:

- Verifying to students and the public that an institution meets a set of established standards (e.g., curriculum, faculty, student services, fiscal stability) and assisting individuals in identifying the institutions that meet the standards;
- Determining eligibility for federal and state funds for higher education;
- Establishing criteria for professional and state certification and licensure;
- Assisting institutions in making determinations in accepting academic credits upon transfer from other institutions;
- Assisting employers in evaluating the academic credentials of prospective employees;
- Providing the public and the private sector with a basis for making determinations about private and public giving; and
- Providing goals for institutional self-improvement and providing a means for involving faculty and administration in institutional evaluation, planning, and improvement.\[^{[1]}\]
The National Advisory Committee on Institutional Quality and Integrity

Although the federal government does not accredit institutions of higher education directly, it approves accrediting agencies that it deems to be “reliable authorities” with regard to the quality of the education or training provided by the institutions that they accredit. In 1968, the Commissioner of Education created the Accreditation and Institutional Eligibility Advisory Committee to assist the federal government in developing criteria to review and designate accrediting agencies under the Higher Education Act.

Today, this advisory committee is known as the National Advisory Committee on Institutional Quality and Integrity (NACIQI). It is an independent advisory committee established by statute that advises the U.S. Secretary of Education on the recognition of postsecondary accreditation organizations.

The functions and mission of NACIQI are laid out in Section 114 of the Higher Education Act. Specifically, NACIQI is to advise the Secretary of Education regarding:

• The establishment and enforcement of the standards for accrediting agencies under the Higher Education Act;
• The recognition of specific accrediting agencies or associations;
• The eligibility requirements for institutions of higher education under Title IV of the Higher Education Act;
• Recommendations for improvement of the eligibility and certification process for institutions of higher education; and
• The relationships among accrediting agencies, states, and the federal government, commonly referred to as the higher education triad.

Over the years, Congress has stipulated specific standards in statute that NACIQI and the U.S. Department of Education must use to determine whether to recognize an accrediting agency as a reliable authority of the quality of the education or training provided by the institutions or programs it accredits. In addition to specifying that accrediting agencies must have standards related to student achievement, faculty, finances, and facilities, the Higher Education Act lays out required procedures for operations and the affording of due process to accreditors’ member institutions.

One of NACIQI’s functions is to put forth policy recommendations related to the reauthorization of the Higher Education Act. NACIQI provided its most recent recommendations in 2018.

NACIQI consists of 18 members, with six each appointed by the Speaker of the U.S. House of Representatives, the President pro tempore of the U.S. Senate, and the U.S. Secretary of Education. As is required by statute, NACIQI meets no less than two times per year. Meetings are typically held in the spring and the fall and are open to the public.

In addition to accreditors receiving recognition from the U.S. Department of Education and NACIQI, the private, non-government Council for Higher Education Accreditation (CHEA) also reviews and recognizes accreditors. Though many accreditors are recognized by both the U.S. Department of Education and CHEA, only recognition by the U.S. Department of Education allows an institution to qualify for federal student aid. The primary purpose of CHEA accreditation is to assure and improve ongoing academic quality in courses, programs, and credentials. Department recognition is based on ten standards relating to administrative and financial practices, and CHEA accreditation is based on six similar, but slightly different, standards for academic quality.
The Accreditation Process

At the core of the accreditation process are standards. As accreditation is a voluntary, member-driven process, the standards for accreditation are developed and established in collaboration between the accreditors and their member institutions. In becoming accredited, an institution agrees to submit to the standards of its accreditor. Although standards are established and agreed to by accreditors and their member institutions, the U.S. Department of Education requires its recognized accreditors to assess various elements stipulated by Congress in the Higher Education Act. The required standards assess an institution's:

- Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs as established by the institution, including, as appropriate, consideration of state licensing examinations, consideration of course completion, and job placement rates;
- Curricula;
- Faculty;
- Facilities, equipment, and supplies;
- Fiscal and administrative capacity as appropriate to the specified scale of operations;
- Student support services;
- Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising;
- Measures of program length and the objectives of the degrees or credentials offered;
- Record of student complaints received by, or available to, the agency or association; and
- Record of compliance with program responsibilities under Title IV of the Higher Education Act based on the most recent student loan default rate data provided by the Secretary, the results of financial and compliance audits, program reviews, and any such other information as the Secretary may provide to the agency or association.[vi]

Additionally, for institutions offering distance or correspondence education, the Higher Education Act requires that accreditors have standards for institutions to verify that the student who enrolls for a course is the same student who completes and receives credit for the course.[vii]

After receiving initial accreditation, institutions must be reevaluated for accreditation at least every ten years based upon their accreditor and the type of accreditation. Additionally, over the course of an institution's accreditation, accreditors continually monitor their member institutions.

As membership organizations, the activities of accrediting agencies are financed through annual membership dues paid by member institutions as well as through fees assessed on institutions for the cost of the accreditation review.
Evaluation

According to CHEA, the key components to the accreditation evaluation process are:

- **Self-Study:** Institutions conduct an in-depth self-study that measures and evaluates their performance based on the standards of their accreditor.

- **Peer Review:** The review and evaluation of an institution is conducted primarily by a team of faculty and administrative peers. Volunteer institutional peers review the institution’s self-study and serve as members of the on-site evaluation team.

- **Site Evaluation:** A team of peer volunteers and members of the public visits the institution to meet with various members of the institutional community to verify in person that the institution meets the standards for accreditation.

- **Judgment by Agency:** Following the review of the self-study and the site visit, the accreditation team makes a recommendation to the accrediting agency. The accrediting agency then makes an accreditation determination. Those judgments may include a variety of determinations — initial accreditation granted, initial accreditation denied, accreditation continued, institution placed on notice or warning, institution placed on probation, accreditation terminated or denied.

- **Periodic Review and Monitoring:** Following initial granting of accreditation and following granting of reaccreditation, the accrediting agency continually monitors its institutions.[viii]

Below is a quarterly snapshot of accreditation judgments made by accrediting agencies in the first quarter of 2019.

### Summary of Accreditation Actions by Accreditor Type for January 1 – March 31, 2019 [ix]

<table>
<thead>
<tr>
<th>Accreditation Action</th>
<th>Regional</th>
<th>National Faith-Related</th>
<th>National Career-Related</th>
<th>Programmatic</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grant Accreditation</td>
<td>4</td>
<td>5</td>
<td>37</td>
<td>116</td>
<td>162</td>
</tr>
<tr>
<td>Reaffirm Accreditation</td>
<td>83</td>
<td>29</td>
<td>179</td>
<td>401</td>
<td>701</td>
</tr>
<tr>
<td>Deny Accreditation</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Withdraw Accreditation</td>
<td>2</td>
<td>2</td>
<td>42</td>
<td>38</td>
<td>84</td>
</tr>
<tr>
<td>Defer Accreditation</td>
<td>0</td>
<td>0</td>
<td>38</td>
<td>28</td>
<td>66</td>
</tr>
<tr>
<td>Notice/Warning</td>
<td>4</td>
<td>2</td>
<td>7</td>
<td>35</td>
<td>48</td>
</tr>
<tr>
<td>Show Cause</td>
<td>12</td>
<td>0</td>
<td>23</td>
<td>11</td>
<td>46</td>
</tr>
<tr>
<td>Probation</td>
<td>3</td>
<td>0</td>
<td>25</td>
<td>68</td>
<td>96</td>
</tr>
<tr>
<td>Appeals</td>
<td>1</td>
<td>0</td>
<td>2</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>109</strong></td>
<td><strong>38</strong></td>
<td><strong>357</strong></td>
<td><strong>707</strong></td>
<td><strong>1,211</strong></td>
</tr>
</tbody>
</table>

Source: [CHEA Almanac](#)
The loss of accreditation is more than just a loss of a simple designation. Because institutions rely on federal funds from student financial aid, an institution’s loss of accreditation usually results in its closure. Recognizing this, accreditors rarely remove a member institution’s accreditation. Policymakers, also understanding the repercussions of the loss of accreditation, have built into law a series of due process requirements that accreditors must afford an institution prior to stripping their accreditation. Often these measures result in years of delay in administrative action.

Types of Accreditors

Over the years, two types of accreditors have evolved: institutional accreditors and specialized/programmatic accreditors. Institutional accreditors evaluate institutions as a whole, determining, among other things, if an institution has adequate administrative, fiscal, and human capacity to carry out its mission and goals. While an institution's offerings in and oversight of its individual departments and schools are reviewed during the course of institutional accreditation, such academic departments and schools are not individually or separately reviewed.

Specialized or programmatic accreditors, on the other hand, evaluate a particular school, department, or program typically related to a given profession or vocation (e.g., medicine, law, funeral services, massage therapy). Although a number of states require students to graduate from an accredited specialized program for licensing purposes (e.g., medical school), for purposes of Title IV eligibility under the Higher Education Act, it is institutional accreditation that is the key.

Institutional Accreditors

There are two types of institutional accrediting agencies in the United States: regional accreditors and national accreditors. Regional accreditors primarily accredit public and private nonprofit degree-granting institutions, though they do accredit for-profit institutions as well. Among the national accreditors there are two broad types: (1) national career-related accreditors, which mainly accredit for-profit career colleges and non-degree granting institutions, and (2) national faith-related accreditors, which mainly accredit nonprofit religious and doctrinally based institutions.

Currently, there are seven regional accrediting agencies and twelve national institutional accreditors. In addition to the regional accreditors, the New York Board of Regents is authorized under the Higher Education Act to serve as an institutional accreditor for Title IV purposes, the only such state government agency authorized under law to serve in this capacity. With regard to degree-granting institutions, the following accreditors are recognized by the U.S. Department of Education: [x]

### Regional Institutional Accreditors

| 1. | The Higher Learning Commission (formerly known as North Central Association of Colleges and Schools) |
| 2. | Middle States Commission on Higher Education [x] |
| 3. | New England Association of Schools and Colleges, Commission on Institutions of Higher Education |
| 4. | Northwest Commission on Colleges and Universities |
| 5. | Southern Association of Colleges and Schools, Commission on Colleges |
| 6. | Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges |
| 7. | Western Association of Schools and Colleges, Senior Colleges and Universities Commission |
Institutional Accreditors, Institutions, and Students

According to the NACIQI Accreditor Dashboard, in March of 2018, 5,262 institutions of higher education operating 6,910 campuses were accredited. Regional accreditors accredited 2,871 institutions with 3,582 branches and national accreditors accredited 1,118 institutions with 1,796 locations. Of the almost 16 million undergraduate students enrolled in accredited institutions in 2017–2018, 14.9 million were in schools with regional accreditation.

Specialized/Programmatic Accreditors

Specialized or programmatic accreditors evaluate a particular school, department, or program typically related to a given profession or vocation. Specialized accreditors span a variety of fields — from education, to the arts and humanities (e.g., art, music, theater, dance), to personal services such as massage therapy, to a number of health care–related vocations (e.g., nursing, physical therapy, medicine).

For purposes of eligibility for Title IV grants and loans, only institutional accreditation is required. However, a programmatic accreditor may also serve as an institutional accreditor in the case of a specialized or vocational institution that is freestanding and whose operations are wholly separate and independent from any other accredited institution with a broader educational mission and offerings.

In addition to recognizing accreditors for purposes of Title IV of the Higher Education Act, the U.S. Department of Education also recognizes programmatic/specialized accrediting agencies for the purpose of participation.
in programs administered by other federal agencies. For example, to participate in certain loan programs administered by the U.S. Department of Agriculture, participants must have graduated from a veterinary school accredited by the American Veterinary Medical Association.

The U.S. Department of Education lists currently recognized specialized/programmatic accreditors here.

Most accreditors are recognized by both the U.S. Department of Education and by the Council for Higher Education Accreditation (CHEA). However, an accreditor seeking recognition from the Secretary of Education must meet the Department’s regulatory criteria for the recognition of accreditors, and must have a link to a federal program (e.g., federal student aid). Thus, some programmatic accreditors, like the Accreditation Council for Business Schools and the American Library Association Committee on Accreditation, cannot be recognized by the U.S. Department of Education and are recognized solely by CHEA.

Recent Developments

In July 2018, the U.S. Department of Education published notice in the federal register of their intent to gather a negotiated rulemaking committee to review proposed changes to federal student aid programs under Title IV of the Higher Education Act. The Accreditation and Innovation Committee was broken down into three subcommittees: Distance Learning and Education Innovation, Faith-Based Entities, and TEACH Grants. In lieu of issue papers delineating principles for negotiated rulemaking, the Department published redlined regulatory text as the basis for negotiations. The Department’s proposed changes can be found here.

Following a call for nominations for committee members in October 2018, committee members were selected and the negotiated rulemaking session began in January of 2019, occupying four separate sessions between January and April. The committee members reached a consensus in early April, and the Department published the proposed changes for public comment shortly thereafter.

The proposed changes reaffirm that accreditation status is based on published standards, rather than on religious or other mission-based policies, and outlines substantive changes to an institution’s mission statement that requires the accrediting agency’s approval. Other proposed changes address the pre-accreditation process, when teach out plans and teach out agreements are required, and the requirements of renewal for accrediting agency recognition. The public comment period is scheduled to end in mid-July, and the Department will consider all public comments before publishing the final rule.

Concerns and Recommendations for Reform

The federal government's investment in student aid is significant at more than $150 billion in the 2017–2018 academic year. Given this, policymakers and others are asking what students, the government, and taxpayers are getting for such a large investment. Although many indicators point to the United States still being a leader in higher education research and innovation, some paint a less-than-stellar picture of performance. Annual government statistics indicate that 60 percent of students who start a bachelor’s degree program complete a degree within six years, and, for low-income, minority, and non-traditional students these six-year completion rates are even lower. Additional surveys and studies also indicate that in many instances students learn very little while they are in college.
There has been growing concern about what accreditation is doing to ensure academic quality, especially given its role as the gatekeeper for the federal student aid system. Coupled with this concern is the changing postsecondary landscape, with a surging number of non-institutional providers, such as coding boot camps, MOOCs, and competency-based education courses. This new landscape suggests new roles for quality assurance or accreditation organizations.

Several reports have been released to address the concerns about student performance and the changing postsecondary landscape. In April of 2012 NACIQI, at the behest of the Secretary of Education, released a report entitled Higher Education Act Reauthorization: Accreditation Policy Recommendations to provide recommendations for reform, including retaining the linkage between accreditation and eligibility for federal student aid funds and clarifying the roles of each member of the triad.[viii]

In 2014, a Government Accountability Office (GAO) report raised concerns about the Department's oversight of schools and accreditors, and a follow-up report in 2017 analyzing the current accreditation system identified several strengths, weaknesses, and opportunities for reform.

In 2015, in an effort to extend its formal policy agenda, NACIQI issued recommendations to build upon its 2012 report. The recommendations suggest simplifying the accreditation and recognition process, enhancing nuance in that process, reconsidering the relationship between quality assurance processes and access to Title IV funds, and reconsidering the roles and functions of NACIQI itself. In 2018, NACIQI again released a report detailing recommendations for both reform and encouraging innovation in accreditation.

In late 2015 and early 2016, the U.S. Department of Education put forth a “transparency agenda” for accreditation. The Department’s website publishes accreditors’ standards for evaluating student outcomes and key student and institutional metrics for each accreditor. In addition, the Department launched the Educational Quality through Innovative Partnerships (EQUIP) experimental site designed to “evaluate the effectiveness of granting Title IV student aid flexibility to partnerships between innovative postsecondary institutions and non-traditional providers.”[ix]

More recently, in late 2018, the U.S. Department of Education published an updated agenda for higher education, Rethinking Higher Education. As part of this agenda, accreditation reform is guided by nine broad proposals that the Department believes will increase innovation in higher education, increase ease of transfer for students and their families, and streamline both the accreditor recognition process and institutional compliance with accreditation. Further proposals seek to clarify the role of the regulatory triad, and to reevaluate the current institutional compliance standard back to substantial compliance, rather than binary decisions of all or nothing.

Among the many suggestions for accreditation reform that have come from researchers, policy advocates, and institutions are:

• **Severing the link between accreditation and eligibility for federal student aid.** Some have argued that the only way for accreditation to serve as a real means for quality control and improvement is to sever the tie between accreditation and eligibility for Title IV funds.[xi] Others oppose severing the tie, fearing what system the federal government might put in its place as a quality gatekeeper for federal funds.

• **Increasing transparency.** For most of its history, accreditation has been a process carried out primarily behind the scenes, with little transparency or public understanding. While some accreditors have begun posting accreditation decisions on their websites, there continues to be room for improvement.[xii]
• **Redesigning the peer-review model of accreditation.** Over the years many have argued that the peer-review model and membership-driven basis of accreditation in the United States is rife with conflicts of interest, thus stymieing any true quality control efforts.

• **Creating a differentiated accreditation system.** Some have advocated for a more nuanced system of accreditation with determinations that go beyond the current pass-fail system. Such a system could include more risk-sensitive accreditation reviews that concentrate more attention and monitoring resources on weaker institutions.

• **Reforming data collection.** Many advocate for the collection of better data on educational outcomes. Accreditation terminology could also be further streamlined to use a common vocabulary to describe accreditation actions and terms.[xvi]

• **Defining new accreditors.** Some have called for the creation of entirely new accreditation options and allowances for new modes of instructional delivery (e.g., CBE MOOCs, and short-term credentials).

How many of these recommendations for improvement will be made to the current system of accreditation remains to be seen. Any changes to federal law and accreditation are most likely to be made during the next reauthorization of the Higher Education Act, which was scheduled for reauthorization in 2018. In the absence of renewal, changes to accreditation can still occur outside of federal statute. For example, accreditors’ decisions to post institutional reports or decisions on their websites was unrelated to statutory change.

**Sources:**


ii The National Defense Education Act of 1958, Pub. L. No. 85-864, often considered the predecessor to the Higher Education Act of 1965, was the first federal statute to provide financial support beyond veterans to attend higher education.


iv The provision allowing an unaccredited institution whose credits were accepted for transfer by at least three accredited institutions to be eligible was dropped in the 1992 reauthorization of the Higher Education Act. However, there are allowances in the statute that allow for new institutions with provisional accreditation from a recognized accrediting agency to qualify for Title IV student aid.


vi Section 496(a)(5) of the Higher Education Act.

vii Section 496(a)(4) of the Higher Education Act.


The Middle States Commission on Higher Education became its own entity (by separating from the Middle States Association of Colleges and Schools) in 2013. For additional information, see [https://www.msche.org/about-us/](https://www.msche.org/about-us/).

Section 496(a)(2) of the Higher Education Act.

For further explanation of the ED recognition process, see [https://www2.ed.gov/admins/finaid/accred/accreditation_pg3.html#Recognition](https://www2.ed.gov/admins/finaid/accred/accreditation_pg3.html#Recognition).


One accreditation agency, the Western Association of Schools and Colleges’ Senior Colleges and University Commission, publishes detailed information about its member institutions’ accreditation decisions in an online database. See [http://www.wascsenior.org/institutions](http://www.wascsenior.org/institutions).


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