
Council of Regional Accrediting Commissions

January 17, 2025

Trump-Vance Administration
Department of Education
Higher Education Transition Team
Washington, D.C.

Dear Higher Education Transition Team:

On behalf of the Council of Regional Accrediting Commissions (C-RAC), we write to offer congratulations to President-elect Trump and Vice President-elect J.D. Vance and to invite opportunities for collaboration regarding important topics relevant to excellence in higher education and accreditation.

During President-Elect Trump's first term in office, C-RAC was pleased to be an integral partner with the U.S. Department of Education (ED) on a wide range of issues related to accreditation. This included being at the table as part of the successful negotiated rulemaking effort to reach consensus on developing regulations designed to strengthen accreditation. As you begin the work to advance new policies related to higher education and accreditation, we again seek to be a partner and a trusted resource for critical information on the many aspects of institutional accreditation that, as the vehicle to ensure quality assurance, *is one of the most powerful levers available for influencing change and assuring value in higher education.*

To that end, we write to provide an overview of the value of accreditation along with several areas we encourage you to pursue to make accreditation an even greater benefit to students, institutions, and taxpayers.

About Us

C-RAC's seven federally recognized institutional accrediting commissions are responsible for accrediting almost 2,800 postsecondary, degree-granting colleges and universities in the United States. These include over 1,500 public, 1,100 private non-profits, and nearly 100 private for-profit institutions. Accrediting commissions are private, nonprofit organizations and provide oversight and accountability of diverse institutions, including faith-based institutions, minority-serving institutions (MSI), community colleges, research universities, and tribal colleges, among others. The commissions and peer evaluation teams at the heart of the accrediting enterprise are made up of volunteers, and at least one of every seven commissioners is a representative of the public.

Our members include Accrediting Commission for Community and Junior Colleges (ACCJC), Higher Learning Commission (HLC), Middle States Commission on Higher Education (MSCHE), New England Commission of Higher Education (NECHE), Northwest Commission on Colleges

and Universities (NWCCU), Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), and WASC Senior College and University Commission (WSCUC).

The Value of Accreditation

For more than 100 years, accreditation has served U.S. higher education through external peer review to assure quality and promote continuous improvement. Accreditors, together with the federal government and states, form the triad charged with shared accountability for ensuring that students attending these institutions benefit from quality educational opportunities. Below are just some of the examples of how today's accreditors are carrying out this responsibility.

Holding Institutions Accountable through Rigorous Standards:

Each agency works to develop and implement standards which must be met for institutions to be accredited. While each agency holds a unique set of standards, aligned with federal regulations, we all share a common framework reflecting the requirements under the Higher Education Act.

When institutions fail to demonstrate compliance with our standards, we take the necessary steps, which include a range of actions such as placing an institution on monitoring or sanctions of notice, warning, probation, or show cause. In cases where institutions are unable to come into compliance, we remove their accreditation through well-defined procedures. Our standards and our actions are designed to protect students and taxpayers and maintain a high standard of quality for accredited institutions.

Driving Institutional Focus on Student Outcomes and Return on Investment:

Today's accreditation is actively informed by data, metrics, and benchmarks that are analyzed regularly to hold institutions accountable for financial sustainability and meaningful student outcomes. We rely on both institutionally-provided data as well as external data sources, such as ED and/or the National Student Clearinghouse, and include information such as graduation and retention rates, enrollment data, institutional financial data, financial sustainability, loan default and repayment rates, as well as data specific to professions, such as licensing exams. We value and rely on student achievement outcomes metrics in evaluating whether institutions meet standards for effectiveness. For example:

- ACCJC, NWCCU, and WSCUC produce public dashboards that track student achievement and trends on multiple measures against peer institutions.
- SACSCOC has developed a ten-factor post-matriculation financial outcomes report with comparisons to peer institutions.
- WSCUC proactively monitors postgraduation student outcomes through institutional analyses of debt-to-earnings and return on investment information and the use of peer comparison dashboards.
- MSCHE monitors student achievement annually, has published dashboards, and takes actions to monitor institutions that fall below the established indicators and metrics.

- ACCJC has a student achievement dashboard that will be made public in June and will add a publicly available return on investment metric to evaluate the strength of institutions in delivering value to their students.
- NECHE has a set of dashboards available to institutions, peer evaluators, and the Commission that track student achievement on multiple measures; institutions write a narrative on educational effectiveness as part of the interim (fifth-year) report; and the Commission monitors institutional graduation rates annually.
- HLC is focused on key student success indicators, which are required by institutions and must be taken into consideration in their evaluations.

Enhancing Institutional Quality through Supporting Continuous Improvement:

Institutional accreditors promote continuous improvement at institutions through meaningful accreditation activities. We constantly assess and communicate with institutions to provide feedback for continuous improvement, and our cycle of accreditation informs and inspires change and innovation for institutions. For example, our work with institutions through the process of self-study allows institutions to not only demonstrate compliance with our standards but also provides them with tools to strengthen their teaching, learning, governance, and operations. For example:

- ACCJC requires institutions to set stretch goals for student achievement that are evaluated on an annual basis as part of their ongoing monitoring. Course completion rates, graduation rates, licensure passage rates, and post-employment metrics are among the important factors that ACCJC uses as institutions stretch toward higher levels of improved performance.
- HLC offers institutions multi-year Academies on assessment of student learning and student success to deepen their knowledge and skills to support their students and faculty.
- MSCHE requires that institutions use data to set self-study priorities that inform beneficial outcomes for students resulting from the process.
- NWCCU reviews and provides feedback on progress related to institutionally defined goals aligned with their unique missions.
- SACSCOC has a Quality Enhancement Plan that requires institutions to develop a plan that directly results in improving student learning.
- All Commissions identify areas for emphasis and improvement as part of our accreditation actions. Institutions must articulate progress on those areas in subsequent reports.

Encouraging Innovation and Focus on Workforce Readiness:

Higher education is in a period of great change and innovation, and accreditors embrace, encourage, and support change and innovation. For example, institutions are leveraging technology, including Artificial Intelligence (AI), and we are working with institutions to support AI-assisted practices. In addition, we continue to develop new and exciting partnerships with employers, provide more ways for institutions to create learning pathways leading to a degree,

including three-year accelerated baccalaureate degrees, and we are seeing exciting and promising new education models. For example:

- NECHE is in the second year of a two-year pilot to evaluate the quality of noncredit programming in recognition of the vast and growing number of students earning credentials in nontraditional ways. Through collaboration with 6 institutions, NECHE has developed a framework that includes 17 markers of quality ranging from agility to return on investment and from student success to financial capacity.
- HLC has launched a Credential Lab and developed a framework to guide the evaluation of providers outside higher education who offer short-term credentials either independently or in partnership with cooperating colleges or universities. HLC also has a Credential Lab Innovation Center composed of national leaders to help guide all institutions on pathways to successful short-term credential initiatives.
- MSCHE supports the delivery of microcredentials as well as incremental credentialing and was a member of the *Credential As You Go* Initiative in collaboration with SUNY Empire State College.

Informing and Protecting Students and Taxpayers through Rigorous Transparency:

Accreditors communicate critical information for students and the public about the accreditation status of institutions. Our individual websites provide continuous updates with respect to the accreditation status of individual institutions along with additional information in cases where an institution's accreditation is at risk. We remain at the forefront of helping students when institutions decide to cease operations. This support also includes ensuring students have current and accurate information regarding closures, access to transcripts, and teach-out plans and agreements—all of which enable students to continue their studies with as few disruptions as possible.

Facilitating Degree Attainment and Reducing Costs through Transfer of Credit:

We recognize that students are more mobile than ever, moving through multiple colleges and universities to earn their degrees. We believe it is critical for our accredited institutions to make this easier as such efforts can improve student success in degree attainment while also reducing the cost of education. Our commitment in this area is reflected in our standards and policies where we require institutions to examine their transfer of credit policies and modify them to ensure more equitable transfer of credit for students. As we move into the workforce focus of short-term credentials, training by accreditors will assist institutions in creating transferable pathways. We also support dual credit and concurrent enrollment of high school students interested in achieving college credentials.

We are also excited about the potential of artificial intelligence (AI) in support of accreditation. MSCHE and WSCUC are members of the Learning Evaluation and Recognition for the Next Generation (LEARN) Commission, helping to evolve policy and practice for learner transfer in the 21st Century. One initiative is to consider how emerging technologies, including (AI), can assist with transfer of credit to expedite and streamline the credit transfer process for students.

Saving Federal Resources through a Robust System of Peer and Public Review:

Accreditation is a multi-layered decision-making process that relies on rigorous peer review to define and evaluate whether institutions meet high standards. This process of peer review, conducted by over 4,000 volunteer experts, saves the federal government significant costs and time by leveraging the resources of accreditors. Additionally, the volunteer experts represent higher education, business, various professions, and the general public, reflecting a robust range of perspectives and expertise. Agency performance is in turn overseen by ED which applies strict recognition tests for accrediting agencies.

The Opportunity

The next four years provide an incredible opportunity to dramatically improve our system of higher education, and accreditation remains one of the most powerful levers to do this effectively. American colleges and universities are the envy of the world, yet we must work together to address the challenges we face, including cost, access, and student outcomes. Accreditors uphold and advance accountability, data, transparency, and innovation that are needed to maintain and improve the best higher education system in the world.

The Trump administration is in a unique position to dramatically strengthen the value of higher education to prepare students for global competitiveness and meet the needs of the 21st century workforce. As you develop policies and regulations related to accreditation, we urge your consideration of the following high-level recommendations:

Improve Federal and Other Data:

Accreditors need access to timely and accurate institutional data. Recent improvements to federal IPEDS data—including moving beyond reporting on just first-time, full-time students—have been an important step, but more must be done. We hope to continue discussions we drove with the Department over the past two years regarding the most appropriate federal data indicators and other information that will help improve the assessment of quality and performance of our institutions.

Reduce Mandates on Accreditors which Increase Complexity and Cost for Institutions:

We urge the Trump administration to reduce unnecessary mandates for accreditors that have no return on investment and only serve to burden institutions through less efficiency and greater costs. This ultimately hurts students and taxpayers and stifles innovation. For example, last year during negotiated rulemaking, we opposed the proposed expansion of required visits to additional and branch campus locations that would only increase costs for institutions without any clear justification for how such a requirement would lend to quality assurance. Also, accreditors continue to implement regulations specific to substantive change, which tend to be overly burdensome. ED's process of validating and approving institutions seeking to change accreditors has proved challenging and time consuming as well. This is an issue we would strongly encourage ED to address.

Recognize New Accreditors Under the Same Standards and Requirements:

We support the development of policies to facilitate the recognition of new accreditors; however, we hope that new accreditors would meet the same federal rules and requirements for recognition as existing agencies do.

Conclusion

We are committed to working with you and others in the Administration on these and other important areas in support of strengthening our nation's system of higher education.

Please feel free to reach out to Dr. Heather F. Perfetti (hperfetti@msche.org), C-RAC Chair and President of MSCHE, or any of the individual Commissions should you have any questions or would like additional information.

Thank you, and we wish you success.



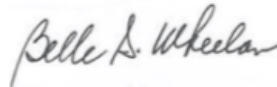
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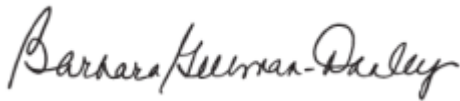
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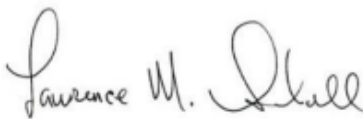
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