
Council of
Regional Accrediting Commissions

June 24, 2025

The Honorable Tim Walberg
Committee on Education and the Workforce
U.S. House of Representatives
2176 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Walberg:

On behalf of the Council of Regional Accrediting Commissions (C-RAC), we write in response to H.R.4054, the Accreditation Choice and Innovation Act, being considered in the House Education and Workforce Committee this week.

C-RAC includes seven federally recognized institutional accrediting commissions that are responsible for accrediting over 3,000 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, historically Black colleges and universities (HBCUs), other minority-serving institutions (MSIs), 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.

C-RAC has reviewed the proposed legislation and while there are several provisions we support, several others raise significant concern and prevent us from being able to support its passage.

Areas of general agreement include: the extension of the termination date of National Advisory Committee on Institutional Quality and Integrity (NACIQI); language defining what constitutes a “substantive change” to focus on institutional changes which have the greatest need for additional accreditor review; maintenance of the current law prohibiting the Secretary of Education from regulating on issues related to student achievement standards; language ensuring accreditors have a clear process for addressing student complaints; and the concept of allowing for an accelerated path to recognition of new accreditors, to the extent they are held accountable to the same rules and regulations as current accreditors.

Provisions in which we have concern include the following:

The prohibition of representatives of member institutions from serving on our individual commissions.

Accreditation is a peer review system that has been successfully used to strengthen American higher education for more than 100 years. The belief that such members are unable or unwilling to hold fellow institutions accountable ignores the long track record of commissions taking

appropriate actions against institutions struggling or failing to meet accreditation standards. This belief also ignores rigorous conflict of interest policies which are in place and enforced by every one of our agencies as well as the multi-level decision-making process that defines accreditation and involves thousands of trained volunteers.

The inclusion of expanded standards related to student achievement.

Accreditors remain focused on student outcomes, such as graduation, transfer, and completion rates, enrollment patterns, cohort default rates, and other data, which are continuously monitored through data analysis and through dashboards available to the public. These data points, combined with our on-site visits and institutional reports, provide a comprehensive review of an institution, help us to identify institutional distress and engage in appropriate levels of monitoring and compliance actions. As such, the prescriptive measures included in the legislation are unnecessary.

The limitation on accreditors setting additional standards.

Under current law, accreditors are provided with clear authority to have and apply standards beyond those included in the Higher Education Act (HEA) for purposes of Title IV eligibility. This authority is critical because accreditors drive institutional improvement beyond a focus solely on Title IV eligibility for institutions with different missions. Although the standards under HEA are broad, they do not fully account for areas many accreditors see as important in evaluating institutional quality, supporting innovation, and driving improvement. For example, many commissions have used this flexibility to develop standards related to institutional mission, ethics and integrity, public disclosure requirements, and post-graduate outcomes. In addition, variation in standards, like new accreditors, increases competition and gives institutions more options for accessing Title IV funding in a way that best meets their needs.

C-RAC has appreciated the willingness of your staff to discuss our views on accreditation over the past several months. As you move forward with this legislation, we would appreciate the opportunity for continued dialogue on our concerns as well as those many aspects of the bill which we support. If you would like to discuss our position further, please contact the Chair of C-RAC, Dr. Heather Perfetti, by email at hperfetti@msche.org.

Sincerely,



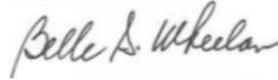
Dr. Heather F. Perfetti
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President, Middle States Commission on
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Dr. Jeff Fox, Interim President
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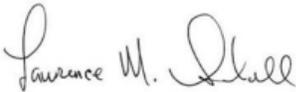
Dr. Belle Wheelan, President
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Dr. Barbara Gellman-Danley, President
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Dr. Maria Toyoda, President
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Dr. Lawrence M. Schall, President
New England Commission of Higher Education
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cc: Ranking Member Bobby Scott, House Committee on Education and Workforce