



POLICY BRIEF

Improving Oversight in Higher Education

Policy Recommendations on Accreditation

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ITHAKA S+R

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Introduction

Accreditation is a central feature of higher education quality assurance in the United States, but historically, much of the process has operated out of public view and within a statutory framework that has not changed much in recent years. Declining public trust in higher education and questions about its value, however, have resulted in greater public and political scrutiny of the performance of colleges and universities. As a result, the role of accreditation agencies in monitoring and evaluating institutional quality, especially as measured by student outcomes, has increasingly been the subject of public debate.

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At the same time, the broader accreditation landscape has shifted. Regional boundaries for institutional accreditors ended in 2020. Students in accredited programs that offer short-term, workforce-aligned credentials can now receive Pell grants. These developments, along with the move by public university systems in the Southeast to create a new accreditor, will shape how the system functions going forward.¹ The postponement of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) summer meetings and new board appointments to the committee have added more uncertainty to how federal oversight will operate in the near

¹ Hallie Busta, "Another Regional Accreditor Drops Geographic Limits," *Higher Ed Dive*, July 14, 2020, <https://www.highereddive.com/news/another-regional-accreditor-drops-geographic-limits/581610/>;

Davy Sell and Stephanie Norris, "Workforce Pell Is (Finally) Law. Now What?," *Community College Insights*, Federal Reserve Bank of Richmond, December 4, 2025, https://www.richmondfed.org/region_communities/regional_data_analysis/community_college_survey/community_college_insights/2025/workforce_pell_finally_law_now_what ; Eric Kelderman, "6 State University Systems Are Partnering to Create a New Accreditor. Most Details Are TBD," *The Chronicle of Higher Education*, June 26, 2025, <https://www.chronicle.com/article/6-state-university-systems-are-partnering-to-create-a-new-accreditor-most-details-are-tbd>.

term.² These developments reflect a changing political environment around accreditation and highlight a growing public focus on institutional performance.

In 2023, Ithaka S+R undertook a project, funded by Arnold Ventures, to examine the extent to which accreditor standards and interventions influenced institutional performance, as measured by student outcomes. The outputs of the project are published on the Ithaka S+R website, and include four reports that explore written accreditor standards, data-driven practices, commission action letters, and interviews with stakeholders in the recognition process.³ This report is the final project output and provides an overview of the findings from each of the prior four reports and outlines several policy recommendations that could help strengthen the accreditation process.

² Jessica Blake, "Education Department Postpones NACIQI Summer Meeting," *Inside Higher Ed*, July 8, 2025, <https://www.insidehighered.com/news/quick-takes/2025/07/08/education-department-postpones-naciqi-summer-meeting>.

³ Cameron Childress, "Regional Accreditation Standards: A New Framework for Comparison," *Ithaka S+R*, February 12, 2026, <https://sr.ithaka.org/publications/regional-accreditation-standards/>; Cameron Childress, "Understanding the Impact of Data-Driven Accreditor Practices," *Ithaka S+R*, February 12, 2026, <https://sr.ithaka.org/publications/understanding-the-impact-of-data-driven-accreditor-practices-on-student-outcomes/>; Cameron Childress, "What Commission Action Letters Reveal: A Thematic Analysis of WSCUC Decisions (2012-2024)," *Ithaka S+R*, February 12, 2026, <https://sr.ithaka.org/publications/what-commission-action-letters-reveal/>; Michael Fried, "Beyond Standards: A Critical Examination of the Relationship between NACIQI and Accreditors," *Ithaka S+R*, October 16, 2024, <https://doi.org/10.18665/sr.321332>.

Overview of findings

Across the four workstreams, several patterns appear consistently, despite each project relying on different methods and sources. These findings reflect what we can say with confidence based on the evidence in the reports.

Accreditors emphasize student outcomes in their standards and public materials, but expectations for how institutions should define, measure, and act on those outcomes remain uneven and at times underspecified.

The Higher Education Act requires accreditors to address student achievement but prevents federal authorities from defining what those expectations should be. This limitation contributes to unevenness in how clearly student outcomes are defined or applied across accreditors. Our findings explore the variation in how accreditors describe their expectations about student outcomes, data use, and expected institutional follow-up in their written standards. While some sets of accreditor standards outline specific outcome metrics institutions should track and/or report, others use broader language that ties student success to an individual institution's mission. In our analysis of commission action letters, we find that letters that cite a need for improvement often reference student outcomes. However, standards related to student outcomes are less likely to be cited in “negative” letters—those that indicate an institution is out of compliance—than standards related to institutional finances, governance, and other areas more directly related to institutional operations.

Accreditors receive and review substantial outcomes data, but the data's influence on decisions appears limited. Transparency of student outcomes data alone does not appear to produce large or lasting improvements.

Across our work we see evidence that outcomes data are regularly collected and reviewed throughout the accreditation process, including reaffirmation reviews and annual institutional updates, but the extent to which these reviews influence accreditor decision-making remains uneven. We find that data-driven practices related to student outcomes—

internal dashboards, peer benchmarking, and public-facing dashboards and reports—were linked to modest, short-lived improvements in student outcomes, with little evidence that adopting or maintaining additional practices strengthened those effects. In our interviews with presidents of accrediting agencies and former NACIQI members, we find a similar pattern. Accreditor presidents describe the use of data, whether from the NACIQI dashboards or their own internal systems, as useful context rather than something that directly guides decisions. Data are incorporated into review conversations, but without clearer expectations for how that information should inform evaluation or follow-up, its influence remains limited. This may explain why transparency around student outcomes alone may not lead to sustained change.

The recognition process creates delays and barriers that limit the ability of NACIQI and accreditors to engage in timely and substantive conversations about student outcomes.

Accreditor presidents and former NACIQI members we interviewed describe a review process shaped by long lead times, limited communication, and outdated materials. Accreditors prepare a multitude of pages for NACIQI meetings that may no longer reflect current conditions by the time they are reviewed. NACIQI members are not permitted to ask questions about these materials in advance of the meetings and do not receive updated documentation once the public comment period closes. These constraints come from federal statute rather than the preferences of either party. The result is an adversarial and often inefficient process that limits opportunities for discussion about student outcomes and other priorities.⁴

⁴ Earlier Ithaka S+R research on the NACIQI dashboard pilot found positive associations between increased public visibility of outcomes data and institutional performance. That analysis examined a different type of policy intervention and used different methods, but taken together the studies suggest that the effects of outcomes data can vary depending on where and how their use in the oversight process; Cameron Childress, James D. Ward, Elizabeth D. Pisacreta, and Sunny Che, "Overseeing the Overseers: Can Federal Oversight of Accreditation Improve Student Outcomes?" *Ithaka S+R*, May 25, 2022, <https://doi.org/10.18665/sr.316765>.

Policy recommendations

The varied workstreams of this project sought to examine accreditation and its ability to ensure quality educational experiences for students from several different perspectives. The policies and practices that govern the accreditation process result in a complex network of interrelationships between various stakeholders, including the federal government, the states, accreditors, higher education institutions, students and their families, and the public, among others. The recommendations presented below are directed at these various stakeholders, informed by our current and prior research, expert commentary, and scholarly research. Taken together, the recommendations represent a suite of possible changes to policy and practice that we believe would improve the quality of higher education and the process that assures it.

Strengthening federal expectations for how accreditors use student outcomes

The Higher Education Act (HEA) has not been reauthorized since 2008, and the current political context makes expanded federal oversight unlikely. Under existing law, the federal government cannot define specific expectations for student outcomes within accreditation standards. Any effort to strengthen those expectations would require statutory changes. Below, we outline a set of recommendations that would require federal statutory changes, in the event that those legislative changes are possible in the future.

Update recognition criteria to focus on how accreditors use outcomes data in decisions.

Under current law, the Secretary of Education is prohibited from “establishing any criteria that specifies, defines, or prescribes the standards that accrediting agencies use to assess any institution’s success with respect to student achievement” and from “promulgating any regulations with respect to the standards of an accrediting agency.”⁵ As a

⁵ “GEN-08-12: The Higher Education Opportunity Act,” US Department of Education, Dear Colleague Letter, December 2008, attachment p. 78,

result, recognition reviews focus on whether accreditors have student achievement standards and follow their stated procedures, but they cannot assess the weight that outcomes data play in accreditor decisions. In practice, this means the US Department of Education (ED) and NACIQI may review whether an institution sets goals and whether accreditors monitor those goals, but they cannot evaluate or require any particular level of performance. A statutory amendment would be needed for recognition to examine how accreditors apply outcomes information in practice. With that authority, the Department could require all accreditors to track specific outcome measures, set minimum performance thresholds, or define what kinds of institutional trends should prompt additional oversight. For example, institutions with consistently low first-year retention rates or rising cohort default rates might be flagged for a special visit, required to submit an improvement plan, or placed on a shortened reaffirmation cycle.

Specify the federal definition of student achievement to include financial and workforce outcomes.

Current regulatory language in 34 CFR §602.16(a)(1)(i) states that accreditation standards must set forth expectations for “student achievement” in relation to an institution’s mission, and offers examples such as course completion, licensing exam performance, and job placement. This language is not prescriptive, and accreditors have wide discretion in how they interpret it. As a result, most formerly regional accreditors focus their written standards on completion and learning, while metrics such as repayment and default rates, post-enrollment debt levels, and post-college labor-market outcomes appear less frequently.

A statutory amendment could clarify that “student achievement” also includes financial and workforce outcomes. These specifications would not need to be accompanied by specific thresholds for institutions to meet, but they would create clearer expectations for the types of outcomes accreditors should consider. Updating the definition in this way would align accreditation more closely with public concerns about value and return on investment.

<https://fsapartners.ed.gov/sites/default/files/attachments/dpccletters/GEN0812FP0810AttachHEOADCL.pdf>.

Modernize NACIQI's processes to support more timely and substantive oversight

Exempt NACIQI from Federal Advisory Committee Act (FACA) restrictions on communication.

One of the greatest barriers to the relationship between NACIQI and the accreditors is the former's status as a federal advisory committee. There are myriad rules and regulations for such entities that create friction in the kind of frank and free-flowing communication that promote collegial relationships to which many in higher education aspire.⁶ Much of the data ultimately reviewed by NACIQI is out of date by the time it is reviewed by the members because of the long lead times for material submissions required by FACA regulations and other administrative limitations. Accreditation materials are often submitted more than a year in advance, and outcomes data from sources like IPEDS and College Scorecard typically lag by one to two years. As a result, the information NACIQI members review may not reflect recent institutional conditions or updates to accreditor policies, which limits the usefulness of those discussions and may cause accreditors to respond to concerns that have already been addressed.

Although this would require an amendment to the law, more opportunities for accreditors, NACIQI members, and ED staff to be in sustained, synchronous conversation about higher education quality will advance them towards their shared goals more effectively than a few hours together in a high-stakes, potentially antagonistic encounter every five years.

Establish new expectations for NACIQI meetings.

By statute, NACIQI meetings are the time for accreditors and members to discuss applications for recognition, but such meetings could be re-designed to better focus on shared priorities, such as student success. A more collegial approach, with a shared process of agenda development, could reduce the adversarial nature of NACIQI's relationship with accreditors and make their time together more meaningful. Of course, a cooperative approach would reduce the oversight aspect of the

⁶ Michael Fried, "Beyond Standards: A Critical Examination of the Relationship between NACIQI and Accreditors," *Ithaka S+R*, October 16, 2024, <https://doi.org/10.18665/sr.321332>.

relationship between NACIQI and accreditors. This tradeoff may be beneficial given that accreditation presidents report that NACIQI's currently wields little influence on their policies and practices.

Improve stakeholder understanding and use of outcomes data

Increase stakeholder data fluency.

The institutional and accreditor dashboards provide a wealth of information about complex and multi-faceted organizations.⁷ Unfortunately, this information does not often reach stakeholders, like students or institutions, who could use the data to make informed decisions if they can adequately interpret the varied charts, graphs, and data tables. NACIQI, ED, or other interested parties should identify potential audiences for this data and provide guidance and support on how to best make use of what information is available.

Expand participation in the quality assurance ecosystem

Broaden the focus to other stakeholders.

While NACIQI plays a key and public role in the recognition process through its biannual meetings, the role of the ED staff analyst is often obscured. The analysts provide the initial review of accreditor evidence supporting their compliance with the criteria for recognition and are a resource for accreditation agency staff throughout the process. Given the limitations on communication with members of NACIQI, it may be possible for interested parties, such as students or outside experts to engage with other parts of the quality assurance ecosystem more meaningfully to support student

⁷ "Key Indicators Dashboard," WASC Senior College and University Commission, accessed January 2026, <https://www.wscuc.org/resources/kid/>;

Institutional Accreditor Dashboards: July 2024, US Department of Education, National Advisory Committee on Institutional Quality and Integrity, https://sites.ed.gov/naciqi/files/2024/07/Institutional_Accreditor-Dashboards-2024.pdf.

learning and success, such as state authorization boards, ED staff members, or the accreditation process itself.

Exploring the role of state agencies in accreditation.

State agencies are responsible for authorizing institutions to operate within their borders, one leg of the quality assurance triad, but they are not formally involved in the traditional accreditation process. The state role and influence in the accreditation process are seemingly increasing with new federal legislation that expands Pell grant eligibility to students who are incarcerated and students who enroll in accredited programs that offer short-term, workforce-aligned credentials. According to statute, state departments of corrections serve as the oversight entity for Prison Education Programs seeking to offer Pell grants, working closely with accreditors and ED to establish the criteria programs must meet to become eligible and then monitoring and evaluating program-level compliance and eligibility.⁸ Similarly, state workforce agencies will likely play a role in certifying programs as “work-force aligned,” once those programs are approved by an accreditor to offer Pell grants for short-term credentials. Finally, in most states, all state public institutions are accredited by the same agency, but little is known nationwide about the role that state agencies play to help their public institutions enact state policies that require accreditor approval. While our work did not examine the state role in accreditation directly, this area seems ripe for further investigation as the federal postsecondary education strategy shifts more responsibility for postsecondary oversight to states.

Expanded role for public participation.

Much of the work of quality assurance happens outside of public view, whether by design or happenstance. NACIQI cannot, by statute, easily communicate with the public. Colleges and universities often segregate accreditation activities from other institutional functions unless a site visit is imminent. Students and their families know little about what accreditation actually means despite the aura of approval and quality some institutions try to leverage in their admissions outreach. All of this opacity in the quality assurance process prevents many stakeholders, but most especially the public, from truly understanding how institutions

⁸ Bethany Lewis, Alex Monday, and Ess Pokornowski, “Pell Restoration and Approval,” *Ithaka S+R*, September 30, 2025, <https://sr.ithaka.org/wp-content/uploads/2025/09/SR-Brief-Pell-Restoration-and-Approval-20250930.pdf>.

define and measure their own success, let alone how successful institutions are supporting students through graduation and beyond. Greater public visibility and transparency of the elements and actors in the quality assurance process could lead to greater public accountability for helping (or forcing) institutions to better serve their students and the greater social good.

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Align recognition deliverables with the information accreditors actually need

Improve recognition process deliverables.

Accreditors often describe the self-study process they require of their institutions as an opportunity for collective reflection, visioning, and planning; however, the recognition process does not afford accreditors this same opportunity to meaningfully incorporate recognition into their own organizational planning. To the degree possible through statute and regulation, the recognition process and the deliverables arising therefrom should be designed such that materials produced meaningfully align with each accreditation organization's own strategic and informational needs as well as those of ED and NACIQI.