



June 25, 2025

The Honorable Tim Walberg
Chair
Committee on Education & Workforce
U.S. House of Representatives
2176 Rayburn House Office Building
Washington D.C. 20515

The Honorable Bobby Scott
Ranking Member
Committee on Education & Workforce
U.S. House of Representatives
2101 Rayburn House Office Building
Washington D.C. 20515

Dear Chairman Walberg and Ranking Member Scott:

I write on behalf of the undersigned higher education organizations to share our concerns regarding H.R. 4054, a bill that amends the Higher Education Act of 1965 to make changes to the accreditation process. The language proposed in this bill mirrors the language found in the College Cost Reduction Act from last Congress, and our concerns with the accreditation components of that bill remain unchanged.¹ However, before sharing our concerns, we would like to acknowledge areas of the bill that we believe offer improvements to the accreditation landscape.

First, we have heard from our members about issues with the current substantive change process and appreciate the language in H.R. 4054 that requires accreditors to have policies in place that would not adversely affect the capacity of institutions to continue to meet certain accreditation standards. Second, we believe that the risk-based, or differentiated, review process is a much better approach to determining what institutions and programs need further assessment to ensure their quality and ability to meet the needs of students. Finally, we support providing institutions with the ability to switch accreditors without the approval of the Secretary of Education should they need to do so. Offering greater flexibility creates a more efficient and cohesive process for institutions when changing accreditors.

When considering improvements to the legislation, as we have shared before, our biggest concern centers on the language in the bill requiring accreditors to establish standards related to student achievement outcomes. Currently, the Higher Education Act imposes student achievement requirements that allow accreditors to use various standards to determine student achievement. With this level of flexibility, accreditors have looked at outcome measures such as completion rates, cohort default rates, and enrollment patterns. However, instead of isolating these elements to determine quality, accreditors have used them in conjunction with on-site visits, institutional reports, and many other criteria to gain a more comprehensive view of the institution and its programs. This comprehensive view allows for a more in-depth and rigorous examination of student achievement outcomes beyond top-level metrics.

We believe that such a change to the assessment of student achievement outcomes represents a dramatic shift in the role of accreditation, and requiring accreditors to monitor compliance with outcome metrics such as median price versus value-added earnings or labor market outcomes would inappropriately blur the lines of the program integrity triad and detract from accreditors' focus on academic quality. Furthermore, we fear that allowing states to become accreditors could also blur the lines of the program integrity triad, especially considering the

¹ American Council on Education. (2024, January 30). *Letter to the House on the College Cost Reduction Act*. <https://www.acenet.edu/Pages/Advocacy-Documents.aspx?k=%22college%20cost%20reduction%22%20AND>

unpredictability of the treatment of institutions in any given state and the possibility of widely varying standards across possibly dozens of new accreditors.

Thank you for your time and attention to these matters. We look forward to continuing this conversation with you as this process moves forward and welcome any opportunity to work together to strengthen the accreditation system without unfairly penalizing institutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell". The signature is written in a cursive, slightly slanted style.

Ted Mitchell
President

American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
National Association of Independent Colleges and Universities