

Commission for Public Higher Education



Business Plan

Table of Contents

Executive Summary.....	3
Mission.....	4
Present Problems with the Accreditation Landscape vs. Regulatory & Legislative Solutions.....	5
Industry and Market Analysis	6
Legal and Organizational Structure.....	10
Department's Recognition of CPHE as an Institutional Accreditor.....	12
Process for Institutions to Switch or Add Accreditation by CPHE	15
Accreditation Standards, Policies, Procedures & Services.....	18
Revenue Model.....	19
Risk Analysis.....	21
Project Milestones & Timeline.....	22
Conclusion.....	23



COMMISSION FOR PUBLIC HIGHER EDUCATION

Executive Summary

The Commission for Public Higher Education (“CPHE”) is a first-in-kind accrediting entity founded by six university systems: the State University System of Florida, the University System of Georgia, the University of North Carolina System, the University of South Carolina System, the Texas A&M University System and the University of Tennessee System.

These Founding University Systems have collectively recognized growing concerns over the quality, efficiency, and poor return on investment with respect to the current marketplace of accreditors. CPHE will serve as a desirable alternative for public institutions of higher education.

The Founding University Systems have come together to form a new accrediting entity that is intended to serve public institutions. CPHE will laser-focus on student outcomes, streamline accreditation standards, focus on emerging educational models, modernize the accreditation process, maximize efficiency without sacrificing quality, and ensure no imposition of divisive ideological content on institutions.

CPHE will be a non-profit organization incorporated in Florida and will follow an aggressive timeline in pursuit of recognition as a Title IV gatekeeper by the U.S. Department of Education. Upon recognition, CPHE intends to accredit state public colleges and universities throughout the United States.

1. Mission

The Commission for Public Higher Education (“CPHE”) is a consortium of higher education systems from Florida, Georgia, North Carolina, South Carolina, Texas, and Tennessee (“Founding University Systems”)¹ offering a new accreditation model that will focus on academic excellence, student outcomes, process efficiency, and pursuit of quality assurance for public postsecondary education.

CPHE’s mission is to advance the quality and improvement of higher education by accrediting and pre-accrediting state public colleges and universities that are incorporated, chartered, licensed, or authorized in the United States. CPHE shall serve as the institutional accrediting agency for state public colleges and universities that award associates, bachelor's and/or higher degrees.

By establishing rigorous, transparent, and adaptable outcomes-based accreditation standards and practices, CPHE will ensure that colleges and universities meet and maintain academic quality and excellence on behalf of their students. CPHE will enable accredited institutions’ participation in Title IV Federal Student Aid (“Title IV”), supporting institutions in maintaining excellence while ensuring student protections.

CPHE’s competitive advantage lies in modern accreditation frameworks that emphasize data-driven assessment, institutional innovation, and regulatory compliance.

In advancing its mission, CPHE will be guided by the following core principles:

- It is appropriate and necessary to introduce competition, aligned with state and institutional needs, into the existing marketplace of college and university accreditation;
- It is in the best interests of all interested parties, including students, to launch an accrediting body comprised of true peer institutions focused on public colleges and universities and their governing university systems;
- It is imperative to reduce bureaucracy through a more efficient and focused accreditation process, which will result in lower costs and significant time savings for member institutions and will translate into lower tuition prices for students and families;

- It is critical to ensure that this new accrediting body is accountable to the states of the member institutions, and
- It is necessary for the new accrediting body to become and remain recognized by the U.S. Department of Education for the purposes of Title IV participation by its accredited institutions.

2. Present Problems with the Accreditation Landscape vs. Regulatory & Legislative Solutions

Accreditation provides numerous benefits for an institution of higher education, from instilling public confidence in the quality of education delivered to providing access to Title IV funding administered by the U.S. Department of Education (“Department” or “ED”). The framework for U.S. accreditation is established by the Higher Education Act, which broadly delineates certain essential standards that must be established by accrediting agencies for colleges and universities. “Accreditation agencies independently determine how to assess the required standards and may implement additional standards beyond those mandated by statute.”² Over time, some established accreditors have shifted away from prioritizing educational quality and student outcomes and allowed for bureaucratic bloat, delays, and increased costs to permeate the accreditation process.³

Legislation enacted in various states has sought to address the growing concerns over the current accreditation marketplace. For instance, in 2022, Florida Statute 1008.47 was enacted to prohibit “a public postsecondary institution from being accredited by the same accrediting agency or association for consecutive accreditation cycles.”⁴ In 2023, Florida amended Florida Statute 1008.47 to prohibit an accrediting agency from compelling “any public postsecondary institution to violate state law. . .”⁵

Similarly, in 2023, the North Carolina General Assembly passed G.S. 116-11.4 within House Bill 8, requiring that the state’s public universities adopt and abide by a policy

by which any university may not be accredited by the same agency across two consecutive “accreditation cycles.”⁶

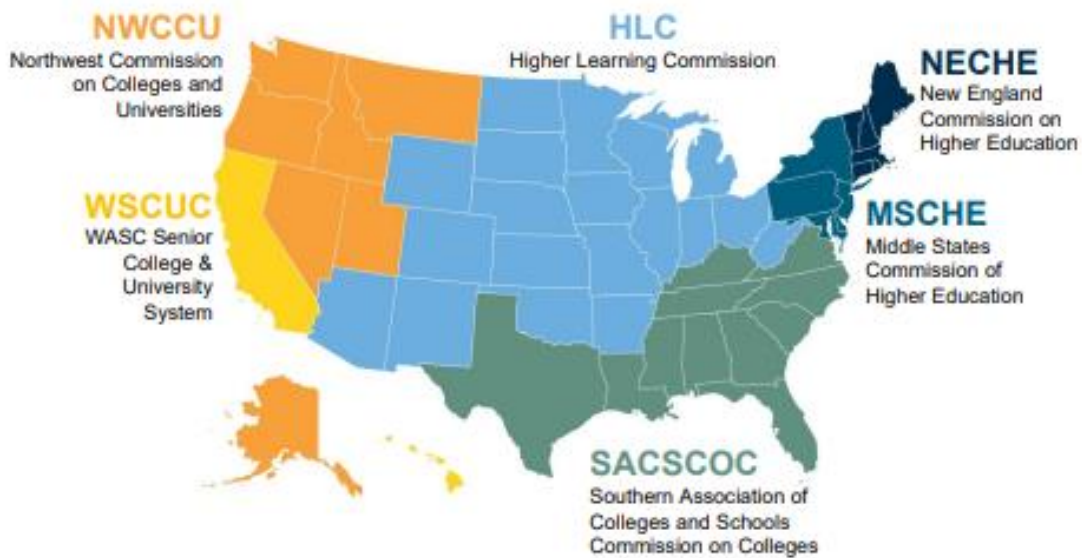
In Texas, Section 61.051(a) of the Texas Education Code was amended to include a directive to the Texas Higher Education Coordinating Board for “adopting rules or taking other action necessary to ensure that each institution of higher education is properly accredited as required to participate in the federal financial aid program under 20 U.S.C. Section 1070a and other federal student financial assistance programs.” (Signed by Texas Governor Greg Abbott May 20, 2025 to be effective September 1, 2025. Provision eliminates specific reference to the regional accreditor.)

Although these legislative strides have helped state colleges and universities position themselves to seek accreditation from an accreditor that best suits their institutions’ specific needs, more must be done to introduce a competitor into the marketplace that prioritizes student outcomes and maintains excellent standards while promoting efficiency.

3. Industry and Market Analysis

There are two main types of U.S. accrediting agencies in higher education: institutional accreditors and programmatic accreditors.⁷ An Institutional Accreditor grants accreditation to an entire institution, while a Programmatic Accreditor ensures that a specific department or program “meets established standards for a certain field of study.”⁸ Beginning July 1, 2020, ED eliminated the distinction between regional and national agencies and categorized all accrediting agencies recognized by ED as “nationally recognized” accrediting agencies.⁹ Thus, the seven former “regional” institutional accreditors, now “national” institutional accreditors,¹⁰ are no longer confined to a designated geographical region and can accredit institutions across the United States; however, for the most part, these seven accreditors have retained their regional scope.¹¹

For example, all public colleges and universities governed by the Founding University Systems are currently accredited by the same national accreditor (*albeit*, a few public and private institutions in Florida and Texas have begun the process of seeking to switch accreditors from their current accreditor to another accreditor). On the other hand, programmatic accreditors have a national scope, such as the American Bar Association, which is the accreditor for law schools across the country.



*The

**ACCJC does not appear on this map because it is a subset of WASC.

Federal Regulatory Improvements:

A series of revisions to federal regulations now make it possible for a U.S. college or university to partner with an accreditor on the basis of qualities other than geography, and thereby opened a competitive market for institutional accreditation:

- 1) Effective as of July 1, 2020, revised ED regulations eliminated many limitations formerly imposed through accreditation: deleting restrictions on accrediting bodies and on institutions that previously required partnerships according to geographic region, easing the process by which an institution may partner with a new or different accreditor, making it possible for an institution to be accredited dually by different accreditors, and opening opportunities for new accreditors to be recognized by the Department. The combined effect of these revisions to Department regulations makes institutional accreditation more truly “voluntary,” whereas an accreditor’s membership had previously been, for all practical purposes, mandatory as dictated by region.¹²
- 2) An executive order issued by the White House on April 23, 2025 sought to “streamline the process for higher education institutions to change accreditors.”¹³
- 3) A May 1, 2025 “Dear Colleague” letter (DCL-ED-GEN-25-03: Changes to the Approval Process for Changing Accrediting Agencies) issued by the Department specified the processes by which an institution of higher education may “change its accrediting agency.”¹⁴ The Department thereby “lifted the temporary pause” (which had been instituted on October 29, 2024) on consideration of applications for recognition for new institutional accreditors.¹⁵

Market Gaps Met by CPHE

In assessing the current accreditation marketplace in the United States, CPHE sees the following market gaps in which CPHE will offer a competitive advantage over the current institutional accreditors:



True Peer Review: For Publics by Publics

- Accreditation will be based on true peer review—review by public institutions, for public institutions.



Focus on Student Outcomes

- Enhanced focus on student outcomes rather than on student inputs, which will ease reporting requirements and avoid the bias towards ever-increasing spending in legacy models.



Streamline Accreditation Standards

- Within the requirements of the Higher Education Act (HEA), streamline standards and reduce redundancies that are not directly tied to academic quality or student success.



Focus on Emerging Educational Models

- Focused on emerging educational models, including hybrid learning and workforce development programs.



Modernize the Accreditation Process

- Modernize the accreditation model with emphasis on transparency, technology, and innovation, while leveraging data analytics for institutional performance tracking.



Efficiency Matched with Quality

- Swift determinations for accreditation decisions compared to legacy models.



Eliminate Divisive Ideological Standards

- No imposition of divisive ideological content on institutions

4. Legal and Organizational Structure

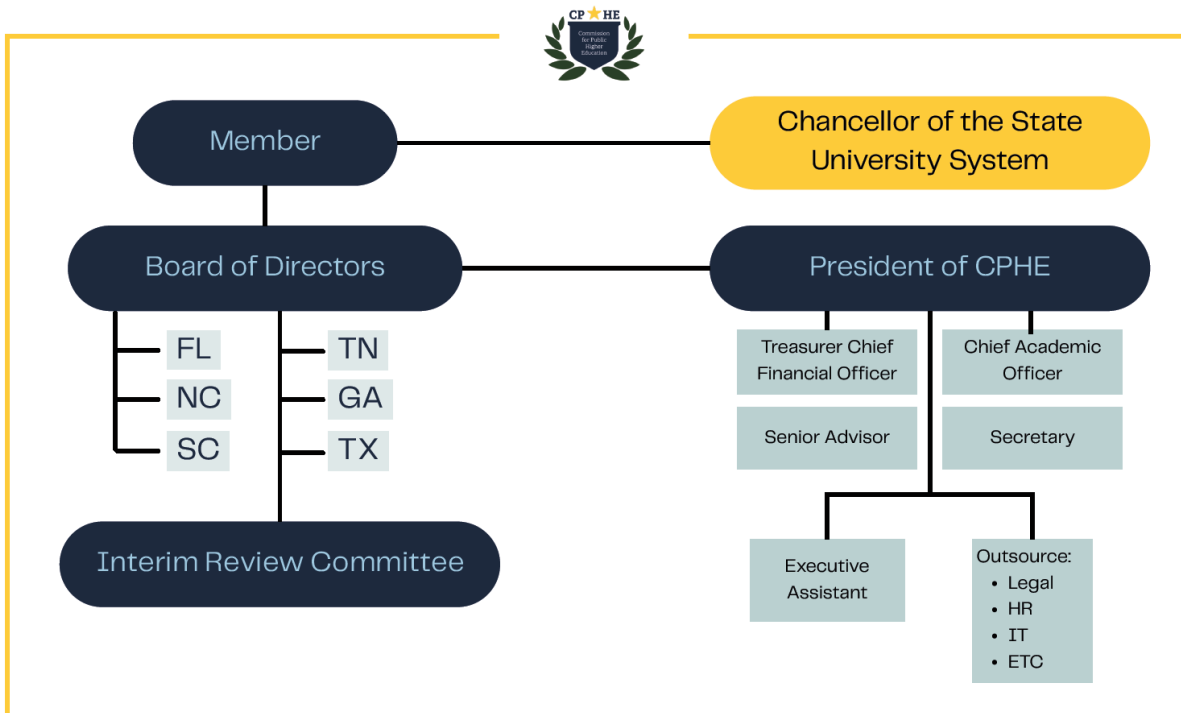
CPHE will be a non-profit organization incorporated in Florida, with 501(c)(3) tax exempt status under the Internal Revenue Code. The sole member of CPHE will be the Board of Governors of the State University System of Florida as the body corporate.

The administration and oversight of the affairs of CPHE will be overseen by a non-paid Board of Directors. The Board of Directors shall establish accreditation standards, policies, and procedures and take accreditation actions (e.g., approval of institutional accreditation applications). The initial six members of the Board of Directors will consist of individuals appointed by the Founding University Systems.

The Bylaws allow additional directors to be appointed, such as from other public state university systems and such as individuals not associated with member university systems who possess content and policy expertise, for a maximum of eleven directors, and additional members can also be added

The CPHE will be staffed with a compensated President, Chief Financial Officer, Chief Accreditation Officer, Senior Advisor, and Administrative Assistant. The duties of a secretary to the board can initially be assigned to a compensated member of the staff. University systems may lend executives with accreditation expertise to CPHE during its start-up period. Expansion of compensated staff for CPHE will be commensurate with the demands and growth of the agency.

The general organizational chart of the CPHE is captured below:



An Interim Review Committee (“IRC”) will be established and consist of experts who will be paid stipends for their work and who will conduct a peer review in the accreditation process, and ultimately make recommendations to the Board of Directors for accreditation actions (e.g., conferring accreditation and reaccreditation, approving substantive changes, ensuring compliance with accreditation and standards).

The IRC will be supported by CPHE staff in conducting the accreditation review of an institution. The IRC will consist of, at a minimum, academic experts, auditors, site visit coordinators, and compliance officers.

5. Department's Recognition of CPHE as an Institutional Accreditor

CPHE will seek approval from the Department to serve as a recognized institutional accreditor. CPHE will implement processes as dictated by Department regulations specified under 34 CFR Part 602.¹⁶ These include requirements described in 34 CFR 602.23 regarding an accrediting agency's responsibility to provide information to the public, to develop and seek stakeholder feedback regarding standards and procedures, to manage complaints, and to disclose the accrediting status of institutions.

Department recognition generally takes at least two years from the time an application is submitted to ED. However, in Executive Order 14279 (April 23, 2025)¹⁷, the White House expressed its intent for the Department to "realign accreditation with high-quality, valuable education for students" and to accelerate the recognition of new accreditors.¹⁸

The following summarizes the current requirements and process to achieve Department Recognition:

1. Define the Scope of CPHE's Department Recognition:

The accreditation and pre-accreditation of degree-granting state public colleges and universities in the United States that are authorized to award degrees at the associate, baccalaureate, master, and doctoral degree (both research and professional) level, including those offered by distance education and direct assessment.

2. Establish CPHE's Eligibility for Recognition

CPHE must demonstrate that it has granted accreditation or pre-accreditation prior to applying for recognition to one or more institutions that covers the range of specific degrees, certificates and programs, conducted accrediting activities, including deciding whether to grant or deny accreditation or pre-accreditation, for at least two years prior to seeking recognition.¹⁹

CPHE must also establish a federal *link*, i.e., its accreditation is a required element in enabling at least one of its accredited institutions to establish eligibility to participate in HEA programs.²⁰

3. Submit the Application (i.e., *Petition for Recognition*) and other Required Materials

An accrediting agency seeking initial recognition by the Department must submit a written application to the Secretary of Education via ED's e-recognition system, including a statement of the agency's requested scope of recognition; documentation that the agency complies with the criteria for recognition including a copy of its policies and procedures manual and its accreditation standards; and documentation of how the agency applies its standards in evaluating programs and institutions it accredits that offer distance education, direct assessment or correspondence courses.²¹

The application must demonstrate that CPHE meets the criteria set forth in 34 C.F.R. 602.10-602.28 and procedural requirements in 34 C.F.R. 602.31-602.35. CPHE will be required to provide letters of support from at least three accredited institutions, three educators and, if appropriate, three employers or practitioners, explaining the role for such an agency and the reasons for their support.

CPHE will submit letters from at least one program or institution that will rely on the CPHE as its link to a federal program upon recognition of the agency or that intends to seek *multiple accreditations*, which will allow it in the future to designate CPHE as its Federal link.²²

**4. Undergo Review
by the Assigned
Department Staff
Liaison**

The Department's review process includes a detailed analysis of the Recognition application and documentation by an assigned Staff Liaison from ED's Accreditation Group. The Staff Liaison will visit CPHE, attend meeting(s) of its Board/Commission, accompany CPHE staff on observation visits to institutions, conduct a file review of documents, and review public comments and other relevant third-party information. The Staff Liaison will prepare a draft report that summarizes compliance findings. CPHE will have an opportunity to respond to the draft before it is finalized. The final

document will include a recommendation to the Secretary regarding a grant or denial of initial recognition to the agency.

**5. Review by and
Appearance before
the National
Advisory Committee
on Institutional
Quality and Integrity
("NACIQI")**

NACIQI provides recommendations to ED officials on actions regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes. NACIQI also advises the Secretary on matters concerning accreditation and institutional eligibility for Title IV. NACIQI is comprised of eighteen members, six appointed by the Secretary, six by the House of Representatives, and six by the Senate.²³ Agencies being considered for recognition appear before NACIQI in one of two annual public hearings. NACIQI makes

recommendations for initial and renewal of recognition that are then considered by the Senior Department Official (SDO), who makes the final decision.²⁴

6. Establishing the Federal Link for Eligibility

As noted, establishing the federal link for eligibility will require CPHE to present a letter from at least one institution indicating that it intends to seek multiple accreditations, which will allow it to designate the agency as its Federal link in the future.²⁵ It is anticipated that institutions that intend to seek accreditation by CPHE will request approval from the Department to change or add an accreditor while CPHE is preparing for recognition or, at the latest, by the time the Recognition Petition is submitted to enable CPHE to meet the eligibility requirements under 34 C.F.R. 602.10 and 602.32 (b)(2).

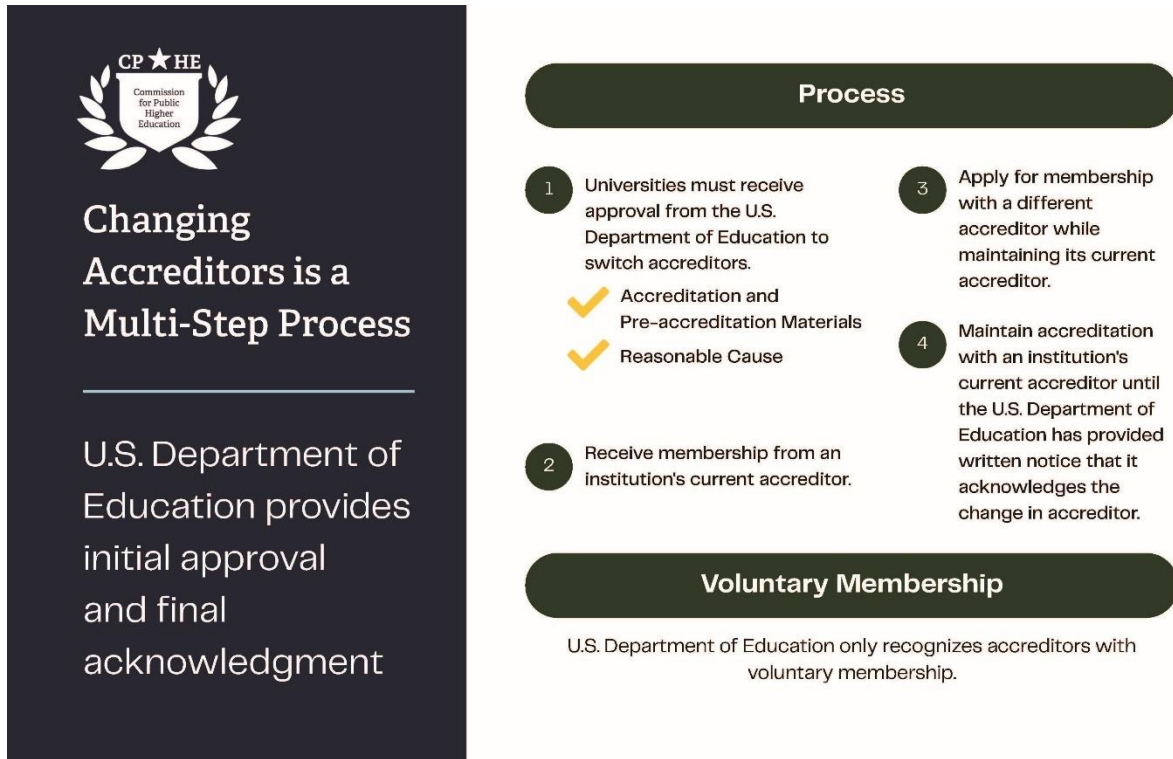
Prior to or soon after applying for CPHE accreditation, an accredited institution will be required to demonstrate to the Department that there is reasonable cause to change or add a new accreditor. Section 6 of this business plan, below, explains the Department's process for an institution to switch or add accreditation.

6. Process for Institutions to Switch or Add Accreditation by CPHE

Once CPHE is a recognized national institutional accrediting agency by the Department, many public state colleges and universities will likely want to switch accreditation to CPHE or add CPHE accreditation to its existing accreditation.

In the May 1, 2025, "Dear Colleague" letter ("DCL")²⁶, the Department "restate[d] the basic obligations under 34 CFR 600.11 for an institution to receive approval and clarifies where the Department does not have the authority to withhold an approval." This DCL rescinded earlier, more burdensome, Department guidance on switching or adding accreditors.

An overview of the process for an institution to change an accreditor is illustrated and discussed in more detail below.



As explained in the DCL, when an institution begins the process of obtaining accreditation from a new accrediting agency (e.g., with CPHE), the institution should (a) notify the Department in writing of its intent to change its primary accrediting agency or to add a new accrediting agency and (b) submit the Reasonable Cause Request Certification ("RCRC").²⁷

The RCRC documents the institution's prior accreditation and provides materials demonstrating "reasonable cause" for changing or adding an accrediting agency as required under 34 CFR 600.11(a) and (b).

In its guidance, the Department recommends that an institution notify the Department in writing of its intent to change or add an accreditor "as soon as possible" after the process of obtaining new accreditation has begun. The Department acknowledges that it will find the cause for changing or adding an accrediting agency to be reasonable if the requisite materials have been submitted



and the cause does not fall under one of the two prohibited reasons for changing accreditors.

That is, the institution (a) has had its accreditation withdrawn, revoked, or otherwise terminated for cause during the preceding 24 months, unless the action was rescinded by the same accrediting agency; or (b) has been subject to probation or equivalent, show cause order or suspension order during the preceding 24 months.²⁸

The Department's guidance indicates that, where there is reasonable cause, it will conduct an "expeditious review" and approve the applications received. In order to ensure prompt consideration, ED's guidance also provides that applications will be automatically approved within 30 days of the date of receipt of a complete RCRC and the change does not involve a prohibited reason.

Importantly, for CPHE, the DCL states that: "The Department also recognizes the significance of voluntary membership in accrediting agencies as required under 34 CFR §602.14(a) but does not believe that an institution's change in accrediting agency due to State law compliance constitutes an involuntary membership. In fact, because accrediting agencies are no longer bound by regions in regulation, institutions have more options to choose from in seeking voluntary membership with accrediting agencies across the country."

Thus, citing recent changes in Florida and North Carolina law, the Department stated that it "will determine that an institution has reasonable cause and therefore approve a change in accrediting agency for institutions that are required to do so based on State action." Until such time as CPHE is fully recognized by the ED as a Title IV gatekeeper, member institutions will remain accredited by their current accreditor and may have dual accreditation during CPHE's incubation period.

Once CPHE has been granted full recognition and Title IV gatekeeping status by ED, member institutions that wish to make CPHE their *primary* accreditor will notify ED in writing of this intention, along with the RCRC.

Upon receiving written acknowledgment from ED that CPHE is an institution's primary accreditor, that institution will be free to leave its former institutional accreditor and maintain sole institutional accreditation with CPHE.

Institutions beginning the process of seeking CPHE accreditation after it has received full recognition from ED may choose to make CPHE their primary accreditor.

7. Accreditation Standards, Policies, Procedures & Services

Pursuant to the Higher Education Act ("HEA"), as an accrediting entity, CPHE must create standards, policies and procedures. Specifically, the HEA requires accrediting bodies to assess institutions in ten specific areas:

- 1 Student achievement relative to the institution's mission;
- 2 Curricula;
- 3 Faculty;
- 4 Facilities, equipment, and supplies;
- 5 Fiscal and administrative capacity;
- 6 Student support services;
- 7 Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising;
- 8 Program length and objectives of degrees or credentials offered;
- 9 Record of student complaints received by the accreditor; and
- 10 Record of compliance with Title IV responsibilities.



The HEA also permits, but does not require, accrediting bodies to impose additional requirements beyond these ten areas on institutions.

Over the past generation, the standards imposed by the formerly regional accreditors have grown more detailed and cumbersome, requiring ever more documentation from institutions to comply. For example, the current version of [a national accreditor's standards](#) and [accompanying instructions](#) for reporting run to hundreds of pages. Even a small institution's reporting requirement may exceed 1,000 pages in a typical reaffirmation cycle. Initial accreditation requires more documentation, and it includes a "candidacy" stage that can last up to four years.

CPHE, by contrast, will streamline the required standards, application process, and reporting requirements, focusing on objective measures that show alignment of assessed areas with an institution's public mission. Institutions currently accredited by one of the former regional accrediting bodies will be offered an expedited application process if they wish to transfer to CPHE.

Following a brief pre-application consultation to determine an institution's eligibility (compliance with state and federal laws, academic programs suitable for an institution of higher education, history of financial stability, etc.) and orientation to establish familiarity with CPHE's standards, the applying institution will submit its comprehensive documentation that demonstrates compliance with those standards.

After the Interim Review Committee determines that the documentation is in order, CPHE will schedule a site visit to the institution, during which key personnel will be interviewed and the submitted information verified. The committee will then make a recommendation to the Board of Directors to accept or reject the institution's application for CPHE accreditation.

Institutions accredited by CPHE will agree to ongoing monitoring, including, but not limited to, unannounced record sampling, live access to data systems and primary documents, and *ad hoc* site visits, as permitted by FERPA. These measures will serve to monitor risk and allow for early identification of problems.

8. Revenue Model

A. Initial Revenue

CPHE's initial stability is ensured by a \$4M appropriation, supplied through the Florida Board of Governors, as appropriated by the Florida legislature. CPHE



anticipates the other five founding university systems will dedicate funds, labor or a combination of, that is comparable to Florida's initial contribution.

The CPHE Board of Directors may consider granting a governance seat on the board to a new university system, where CPHE could seek similar financial contribution obligations. Additional funding may be provided by education-related philanthropic organizations, private entities, corporate sponsors, and the federal government (in the form of grants).

B. Long-term Revenue Streams

CPHE fees will be modeled on fees allocated by other accrediting agencies, with attention to CPHE's fixed costs and the enrollment sizes of the institutions themselves. Annual membership fees, likely collected from all participating institutions beginning in the commission's third year, will be determined by the commission's fixed costs, with portions prorated according to institutional budget and enrollment sizes.

With maturation, the commission may consider revenues of the following sorts:

- Subscription-Based Accreditation Fees. Instead of charging a one-time accreditation fee, institutions could pay a monthly or annual subscription for ongoing accreditation services, compliance monitoring, and advisory support.
- Performance-Based Accreditation Fees. Institutions could pay fees based on their student success metrics, such as graduation rates, job placement rates, or financial stability. This model incentivizes quality improvement.
- Consulting & Advisory Services: Specialized workshops on accreditation compliance.
- Training Programs: Webinars and certification courses for institutional leaders.

CPHE estimates that access to such long-term revenue streams will begin late 2027 to early 2028.

9. Risk Analysis

Given the shifting policy landscape for the role of accreditors in the regulatory “triad” governing U.S. higher education, CPHE should establish a risk assessment framework to identify potential operational, financial, and reputational challenges and formulate mitigation strategies accordingly.

Challenge	Impact	Mitigation Strategy
Operational – Regulatory Changes	Changes in ED policies could affect accreditation requirements.	Maintain ongoing legal and policy monitoring; establish compliance advisory teams.
Operational – Institutional Non-Compliance	Accredited institutions may fail to meet standards, leading to reputational damage.	Implement strict monitoring, periodic audits, and corrective action plans.
Operational – Institutional Misconduct	Institutions may attempt to falsify compliance data.	Develop robust verification processes, independent audits, and whistleblower protections.
Financial – Revenue Shortfalls	Lower-than-expected institutional enrollment could reduce accreditation fees.	Diversify revenue streams through consulting, training, and government grants.
Financial – Funding Delays	Federal grants or donations may be delayed, impacting cash flow.	Maintain emergency reserves and secure multi-year funding commitments.
Financial – Higher Expenses	Expenses for site visits, audits, and staffing may exceed projections.	Optimize accreditation processes using technology and remote evaluations.
Financial – Erosion of State Start-up Funds	State legislatures may reduce or eliminate appropriations.	Educate constituencies and develop broad statewide support for alternative accreditation models.
Reputational – Negative Public Perception	Institutions or media may question accreditation credibility.	Ensure transparency, publish accreditation reports, and engage in public outreach.
Reputational – Legal Challenges	Institutions may dispute accreditation decisions, leading to lawsuits.	Ensure consistent decision-making and clear accreditation standards, procedures and policies.

10. Project Milestones & Timeline

Project Milestones

The following timeline for CPHE to achieve recognition from ED is predicated on sufficient resources (including staff) and applicant institutions. It assumes no changes to the current regulatory and statutory framework for recognition. If those regulations change, the process will be shorter or longer in accordance with those changes.

July 2025

Budget Preparation

- Finalize Articles of Incorporation and ByLaws.
- CPPE incorporated in Florida.
- Apply for IRS Tax Exempt 501c3 Status

August 2025 to August 2025

Initial BOD Meeting, Adoption of ByLaws, and Approval of Corporate Policies and Initial Budget

- ByLaws
- Conflict of Interest Policy and Disclosure Form.
- Whistleblower Policy.
- Document Retention and Destruction Policy.
- Joint Ventures Policy.
- Human Resource Policies.
- Budget

August 2025 to October 2025

Initial Leadership Team and Staff

- President, Chief Financial Officer, Chief Accreditation Officer, Senior Advisor, and Administrative Assistant.

June 2025 to December 2025

Accreditation Model

- Standards
- Policies and Procedures
- Handbook

December 2025 to June 2026

Accreditation Activities

- Begin Accreditation with 6 Institutions.
- Submission of Application for Recognition to Department.

December 2027 to June 2028

ED Recognition of CPPE

- Meetings with ED Officials and Responses to ED Requests Regarding Petition.
- NACIQI Meeting
- ED Approval

11. Conclusion

The launching of a new institutional accreditor is a major undertaking, and CPHE's Founding University Systems have not undertaken it lightly. Growing dissatisfaction with current practices among the existing institutional accreditors and the desire for a true system of peer review among public institutions have led to this endeavor.

Our expectation is that this effort will lead to improved processes and outcomes among member institutions as well as a greater level of competition and reform across higher education accreditation more generally. We look forward to engaging with new partners at the institutional and system levels as we seek the best outcomes for all our stakeholders, especially our students.

¹ The Founding University Systems are the State University System of Florida, University System of Georgia, University of North Carolina System, University of South Carolina System, University of Tennessee System and Texas A&M University System.

² Florida v. Cardona, 23-CV-6118-JB, pg.4.

³ See e.g. Roger Manzer, "Depoliticizing the University: Re-Prioritizing Academic Excellence in Accreditation and Faculty Governance," AEI (June 2025).

⁴ 1008.47, Fla. Stat. (2022).

⁵ <https://www.flsenate.gov/Session/Bill/2023/266/BillText/er/PDF>.

⁶ <https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H8v5.pdf>.

⁷ <https://www.congress.gov/crs-product/R43826>.

⁸ <https://www.congress.gov/crs-product/R43826>.

⁹ In ED's DCL-ED-GEN-25-03 published on May 1, 2025, the Department underscored the national scope of recognized accreditors: "Since the July 1, 2020, implementation of the Trump administration regulatory changes, which received consensus from negotiators, nationally recognized accrediting agencies can choose to conduct accrediting activities across the United States and institutions are free to select an agency whose geographic scope previously did not include the State in which the institution is located (see 34 CFR 602.11)." Specifically, in its regulatory changes effective July 1, 2025, the Department revised the definition of "scope of recognition" in 34 CFR 602.3 to eliminate the former reference to the "geographic area of accrediting activities." In addition, the Department modified 34 CFR 602.11 to provide that an "agency must demonstrate that it conducts accrediting activities within – (a) A State, if the agency is part of a State Government; (b) A region or group of States chosen by the agency in which an agency provides accreditation to a main campus, a branch campus, or an additional location of an institution....; or (c) The United States."

¹⁰ The seven accreditors are: New England Commission on Higher Education ("NECHE"), Middle States Commission on Higher Education ("MSCHE"), Southern Association of Colleges and Schools Commission on Colleges ("SACSCOC"), Higher Learning Commission ("HLC"), Northwest Commission on Colleges and Universities ("NWCCU"), WASC Senior College and University Commission ("WSCUC") and Accrediting Commission for Community and Junior Colleges of the Western Association of Schools and Colleges ("ACCJC").

¹¹ [PowerPoint Presentation](#) For example, SACSCOC still accredits postsecondary institutions in these eleven southern states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, and South Carolina, Tennessee, Texas, and Virginia.

¹² <https://www.govinfo.gov/content/pkg/FR-2019-11-01/pdf/2019-23129.pdf>.

¹³ <https://www.whitehouse.gov/presidential-actions/2025/04/reforming-accreditation-to-strengthen-higher-education/>.

¹⁴ DCL-ED-GEN-25-03: Changes to the Approval Process for Changing Accrediting Agencies <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-04-30/changes-approval-process-changing-accrediting-agencies>.

¹⁵ <https://www.ed.gov/media/document/accreditation-group-letter-accepting-and-reviewing-applications-initial-recognition-may-2-2025-109946.pdf>.

¹⁶ <https://www.govinfo.gov/content/pkg/FR-2019-11-01/pdf/2019-23129.pdf>.

¹⁷ Reforming Accreditation To Strengthen Higher Education, 04-23-2025, 90 CFR 17529, available at: <https://www.federalregister.gov/documents/2025/04/28/2025-07376/reforming-accreditation-to-strengthen-higher-education>.

¹⁸ On April 4, 2025, the Department of Education issued a Notice of Intent to engage in negotiated rulemaking on “[p]otential topics that would streamline current federal student financial assistance program regulations while maintaining or improving program integrity and institutional quality,” which may include accreditation reform.

<https://link.edgepilot.com/s/ea4f532a/jj0VEApZmkC6QuAbFyUWKA?u=https://www.federalregister.gov/documents/2025/04/04/2025-05825/intent-to-receive-public-feedback-for-the-development-of-proposed-regulations-and-establish>

¹⁹ See 34 C.F.R. 602.12(a)(1)-(2).

²⁰ See 34 C.F.R. 602.10(a); see also 34 C.F.R. 602.32(b)(1) and (2) discussed *infra*. If the Department determines, during the course of its review that the agency does not meet the eligibility requirements in Sections 602.10-602.15, the staff will return the application or require the agency to withdraw the application with leave to reapply when the agency is able to demonstrate compliance. 34 C.F.R. Section 602.32(g).

²¹ See 34 C.F.R. 602.31(a)(1)-(3).

²² See 34 C.F.R. 602.32(b)(1) and (2).

²³ The current composition of NACIQI is found at this link. <https://sites.ed.gov/naciqi/bios/>. The six Department of Education appointees to NACIQI will term out on September 30, 2025.

²⁴ An adverse action would be subject to appeal to the Secretary.

²⁵ See 34 C.F.R. 602.32 (b)(2).

²⁶ DCL-ED-GEN-25-03: Changes to the Approval Process for Changing Accrediting Agencies, available at: <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-04-30/changes-approval-process-changing-accrediting-agencies>.

²⁷ See 34 C.F.R. 600.11 and DCL-ED-GEN-25-03 (May 1, 2025). The Reasonable Cause Request Certification form can be found at this link. <https://www.ed.gov/media/document/accreditation-reasonable-cause-certification-checklist-2025-109942.pdf>.

²⁸ Significantly, on this point, DCL-ED-GEN-25-03 states: “Notwithstanding the foregoing, under 34 CFR § 600.11(a)(2), the Department may determine the institution’s cause for changing its accrediting agency to be reasonable if the prior agency did not provide the institution its due process rights as defined in 34CFR § 602.25, the agency applied its standards and criteria inconsistently, or if the adverse action, probation, show cause, or suspension order was the result of an agency’s failure to respect an institution’s stated mission, including its religious mission. In addition, under 34 C.F.R. § 600.11(b)(2)(ii), even if the institution is or has been subject to one of the negative actions described in (b)(2)(i), the Department may determine the institution’s cause for seeking multiple accreditation or preaccreditation to be reasonable if the institution’s primary interest in seeking multiple accreditation is based on that agency’s geographic area, program-area focus, or mission.