

Accreditation in Higher Education

Accreditation is the practice of assessing and recognizing that an academic program or institution of higher education has met standards established by an accrediting agency.¹ The U.S. Department of Education (ED) describes accreditation as “a means of conducting non-governmental, peer evaluation of educational institutions and programs.”²

There are two types of accreditation: 1) institutional accreditation, which applies to colleges or universities; and 2) programmatic accreditation, which applies to departments or programs. The accreditation process for institutions and academic programs is voluntary³ and ongoing, and renewals are required every 5-10 years to maintain accredited status. The accreditation process generally relies on peer review conducted by experts in the field, not the government. The peer review process focuses on assessment of the quality of institutions and their programs.⁴

History of Accreditation

Federal recognition of accrediting agencies began in 1952 to determine which institutions of higher education would qualify to receive federal aid under the G.I. Bill. In 1958, the National Defense Education Act (NDEA) defined the term “institution of higher education” for institutions that would be eligible to receive federal funding to support students in need of financial aid. In 1965, Title IV of the Higher Education Act (HEA) expanded access to federal student aid, regardless of veteran status. In addition to establishing the Pell Grant program and prohibiting discrimination on the basis of sex, the HEA reauthorization of 1972 also allowed accredited for-profit institutions to participate in federal student aid programs. The HEA reauthorization of

¹ [34 CFR § 602.3](#).

² U.S. Department of Education, “*Accreditation in the U.S.*”
<https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/college-accreditation/accreditation-in-the-us>.

³ Although accreditation is voluntary for institutions and academic programs, many graduates would be ineligible for graduate school or licensure if their college or program was not accredited.

⁴ Higher Learning Commission. “*How Accreditation Works for You*”
<https://www.hlcommission.org/for-students/how-accreditation-works-for-you/>.

1992 gave the secretary of ED authority to establish accrediting agency standards.⁵ Since 2008, negotiated rulemaking has been used to regulate and deregulate accreditation.

Accreditation and Title IV Federal Financial Aid

Accreditation is essential for institutions and programs to access federal funding and provide students with financial aid and programs under Title IV of the HEA, including Direct Loans and federal Pell Grants. As of March 2024, ED recognized 27 accrediting agencies as gatekeepers for Title IV funding. During the 2023-2024 academic year there were 5,819 accredited institutions, of which 37 percent were for-profit institutions, 33 percent were public institutions, and 30 percent were nonprofit institutions. By September 2024, \$120.8 billion in federal financial aid had been allocated to more than 9.9 million students at these institutions.⁶

Requirements under Section 496 of the Higher Education Act (HEA)

Section 496 of the HEA⁷ requires accreditors to demonstrate having met a variety of statutory and regulatory conditions, including:

- Consistently apply and enforce standards that ensure the education programs offered are of sufficient quality to meet the stated objective for which they are offered.
- Use review standards that assess student achievement in relation to the institution's mission, including as applicant, course completion, passage of state licensing examinations, and job placement rates.
- Evaluate, among other considerations, an institution's or program's curricula, faculty, facilities, and fiscal and administration capacity.
- Meet required operating and due process procedures with respect to the institutions and programs they accredit.

What do accreditors monitor?

The HEA requires accreditors to monitor and assess student achievement related to mission, course completion, passage of state licensing exams, and job placement rates; the institution of higher education's or program's curricula, faculty, facilities, fiscal and administrative capacities, student support services, recruitment and admissions practices, measures of program length,

⁵ [Higher Education Amendments of 1992](#), Part H of Title IV of HEA: Program Integrity.

⁶ U.S. Department of Education, National Center for Education Statistics, IPEDS, Fall 2023, Institutional Characteristics component (provisional data).
https://nces.ed.gov/ipeds/search?query=Tables+Library%3Ddate_desc&query2=&resultType=all&page=1&sortBy=date_desc&overlayTableId=36304.

⁷ Section 496 of the Higher Education Act sets the standards and criteria that accreditors must meet to be recognized by ED and describes the type of organizations eligible for recognition from ED. Section 496 also requires that accreditors be administratively and financially separate to determine eligibility for HEA programs including Title VI student aid. See:
<https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>.



objectives of credentials offered, and student complaints; and examining the institution of higher education's or program's record of compliance with Title IV requirements, such as student loan default rate data, the results of financial or compliance audits, program reviews, and other information provided to the agency by ED.⁸ Some accreditors will also set student achievement measures, such as graduation rates and benchmarks that schools and programs must meet.

Summary of Executive Order:

“Reforming Accreditation to Strengthen Higher Education”

On April 23, 2025, the Trump administration issued several executive actions related to education, including an executive order on “[Reforming Accreditation to Strengthen Higher Education](#),” which directs the U.S. secretary of education to hold accreditors accountable and take action if they are deemed by the administration to be in violation of federal law. This executive order is a first attempt at trying to dictate curricular and programmatic decisions of institutions of higher education through control of the accreditation process. Under this executive order:

- ED would hold accreditors accountable who fail to meet recognition criteria or require institutions to engage in unlawful discrimination under “the guise of diversity, equity, and inclusivity (DEI) initiatives.”
- ED would recognize new accreditors and mandate member institutions to use data to improve outcomes without reference to race, ethnicity, or sex. ED would provide noncompliance findings under Title VI of the Civil Rights Act of 1964 or Title IX of the Education Amendments of 1972.
- The U.S. Department of Justice (DOJ) and ED would investigate and terminate unlawful discrimination by American law schools including “unlawful DEI requirements.” ED would assess whether to suspend or terminate the American Bar Association (ABA) as an accreditor of law schools.
- The U.S. Department of Health and Human Services (HHS), DOJ, and ED would investigate and terminate unlawful discrimination by American medical schools and graduate medical education entities. ED would assess whether to suspend or terminate the Liaison Committee on Medical Education as an accreditor of graduate medical education.
- ED would take steps to ensure accreditation is free from unlawful discrimination and that barriers to credential and degree completion are reduced, leading to new models of education.
- ED would support accreditation that prioritizes “intellectual diversity” among faculty.
- ED would launch an experimental site to establish “flexible and streamlined quality assurance.”
- Use technology in the accreditor recognition process.
- Streamline the process for institutions to change accreditors.

⁸ (HEA Section 496, Pg. 683). <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>.

Through a blatant overreach of power, the Trump administration seeks to unlawfully strip accreditors of their agency in establishing quality standards for institutions of higher education.

This executive order is an egregious attempt by the Trump administration to weaponize the accreditation process and defund higher education institutions that they consider unaligned with their political agenda. However, the HEA neither prohibits nor limits accreditors from adopting additional standards beyond what is provided in Section 496 of the HEA. Accreditors may continue to lawfully adopt additional standards such as those pertaining to diversity, equity, inclusion, and accessibility.⁹

Furthermore, the HEA states that the secretary of ED “shall not, under any circumstances, base decisions on the recognition or denial of recognition of accreditation agencies or associations on criteria other than those contained” in Section 496 of the HEA.¹⁰ The HEA also states that nothing within the Act “shall be construed to permit the Secretary to establish” recognition criteria for accrediting agencies that are not already required by Section 496 of the HEA.¹¹

Additionally, using the accreditation process to control colleges and universities violates the Department of Education Organization Act, which states that the secretary of ED is not authorized to “exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, or school system, *over any accrediting agency or association*, or over the selection or content of library resources, textbooks, or other instructional materials by any educational institution or school system, except to the extent authorized by law.”¹²

The Trump administration’s directives on accreditation undermine equal opportunity in higher education, harms all students, and weakens economic opportunity.

Accreditation is essential for institutions of higher education to access Title IV financial aid programs such as federal Pell Grants. Through this executive order, the Trump administration is not only attacking accrediting agencies, but they are also directly harming working families and students who depend on financial aid programs to access college and complete their higher education. The executive order would also create significant challenges for institutions who rely on disaggregated data to explain student success. Accreditation also serves a significant role in

⁹ Discrimination on the basis of race, color, national origin, sex, or disability continues to be unlawful. The Trump administration has sought to describe efforts to pursue diversity, equity, inclusion, and accessibility as “illegal discrimination.” Institutions should consult their own legal counsel when deciding how to account for these misrepresentations of the law.

¹⁰ [Higher Education Act of 1965, § 496](#).

¹¹ *Ibid.*

¹² [20 U.S. Code § 3403](#).



preparation for many careers and professional licensure, including public service sectors such as health care and legal aid. Excluding students with middle-to-lower incomes from accessing higher education would strain our workforce, hinder students' economic opportunities, and stunt the social mobility of working families.

The Trump administration's executive order on accreditation would allow bad actors to flourish.

The continued attacks on DEIA from the Trump administration are a reflection of the America First Agenda, which calls for ensuring that “no current or future policies link federal education funding to the teaching of revisionist history, bigotry, or any other dishonest teaching.”¹³

Project 2025 also calls for the start up, application, and acceptance of new accreditors, who would establish standards including political litmus tests likely focused on American nationalism.¹⁴ Some accreditors may be less stringent and seek to allow low-quality, predatory for-profit institutions and programs to gain access to Title IV federal funding.¹⁵

What's next in accreditation?

ED cannot remove an institution's or program's accreditation — only an accrediting agency can do so. However, policymakers, students, and advocates should be wary of the administration's attacks on the recognition of current accreditors and any attempts to remove recognition from accreditors who do not fall in line with the administration's political agenda. Revoking ED recognition of accrediting agencies is a long and extensive process, for which the HEA has established due process requirements to be in place.¹⁶

¹³ See: [Advocate for Teaching the Truth About America's History | The America First Agenda | America First Policy Institute](#). See also [Agenda47: Protecting Students from the Radical Left and Marxist Maniacs Infecting Educational Institutions | Agenda47 | Donald J. Trump](#).

¹⁴ The Heritage Foundation. “Project 2025, Mandate for Leadership The Conservative Promise.” https://static.project2025.org/2025_MandateForLeadership_FULL.pdf.

¹⁵ ED has traditionally played a role in ensuring that accreditors do not help predatory institutions and programs from misusing federal dollars, such as the termination of the Accrediting Council for Independent Colleges and Schools as an ED Recognized Accrediting Agency (ACICS) as a nationally recognized accrediting agency in 2022. See: [Termination of the Accrediting Council for Independent Colleges and Schools as an ED Recognized Accrediting Agency](#).

¹⁶ For more information on decisions to terminate recognition and implications for institutions, see: [Frequently Asked Questions Regarding the Department's Recognition for Accrediting Agencies](#).