

101: HIGHER EDUCATION AND THE TRIAD



WHAT IS THE TRIAD?

The process of regulating and guaranteeing the quality of higher education in the U.S. is complex and involves a number of distinct parties. The Higher Education Act (HEA) designates three separate entities—states, accreditation agencies, and the U.S. Department of Education (ED)—that must grant institutions of higher education (IHEs) approval in order for them to be eligible to participate in federal financial aid programs, like federal student loans and the Pell Grant program. Together, these three gatekeepers comprise what is commonly referred to as “the Triad” in higher education.

WHAT ARE THE GATEKEEPING ROLES OF EACH PART OF THE TRIAD?

U.S. DEPARTMENT OF EDUCATION (ED)

ED certifies and ensures compliance with administrative and fiscal rules according to the Higher Education Act (HEA). These rules include meeting financial responsibility standards set by ED, presenting a sufficiently low cohort default rate (CDR)—an accountability mechanism that keeps the lowest-performing schools out of federal aid programs—and meeting other requirements related to compliance with federal student aid laws, regulations, and departmental guidance. Additionally, ED recognizes which accreditors are able to provide recognition for federal student aid purposes.

STATES

Institutions of Higher Education must be “authorized” in the state in which they operate. This typically consists of recognition or state licensure that an institution is legally operating within that State. This process can vary by state and can depend on state law or the length of time an institution has been operating. State authorization is important to today’s students since it often extends certain consumer protections to them.

In recent years, ED has updated guidance that adds more specificity as to what is required of States when they authorize an institution. For example, current regulations require institutions that offer online programs to receive authorization from each state where their students may reside or join a consortium that recognizes authorization reciprocity across multiple States.

ACCREDITATION AGENCIES

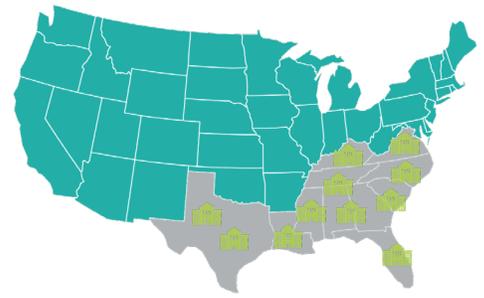
Recognized by ED to accredit institutions of higher education, accreditation agencies apply and enforce statutory standards that pertain to institutional and academic quality—ranging from financial sustainability, student safety and health standards, athletic program integrity, and student outcomes—mainly through reviews which happen every few years. Accreditation agencies also obtain and consider information provided by ED regarding an institution’s financial and administrative compliance status as part of an accreditor’s overall review. There are three major types of accreditation:

Regional – accredits entire colleges and universities, most of which are degree-granting and not for-profit. Each regional accreditor is responsible for IHEs in a designated region of the U.S.

National – accredits entire colleges and universities anywhere in the country, most of which have a single focus—such as career and technical education.

Specialized/Programmatic – accredits programs, departments, or schools within a college or university; this type of accreditation is not used to determine eligibility for federal financial aid.

REGIONAL



NATIONAL



SPECIALIZED/ PROGRAMMATIC



HOW CAN FEDERAL POLICY BE UPDATED TO CREATE A MORE EFFECTIVE TRIAD?

REFORMING ACCREDITATION

The law currently requires accreditors to focus on inputs—compliance with bureaucratic requirements unrelated to desired student outcomes, including completion, employment, equity and value. Instead, federal policy should place a greater focus on the quality of institutions of higher education and the outcomes of their students through the accreditation review process. Accrediting agencies should in be expected to pay more attention to what institutions are doing to improve academic quality and student performance. Additionally, accreditation reform should expand our quality assurance system to

support new validators to assess and approve new and innovative providers of higher learning.

UPDATING FEDERAL REQUIREMENTS AND REGULATIONS

Recent reauthorizations of HEA and regulatory actions taken by ED have created a maze of requirements for colleges and universities. Policymakers should holistically review and consider these requirements and regulations, with improvement in student outcomes as the goal, and update the HEA to better enable institutions to focus on improving student success.

For more information about Higher Learning Advocates’ work on federal postsecondary policy, please contact **Emily Bouck**, Policy & Advocacy Director, at ebouck@higherlearningadvocates.org, and visit www.higherlearningadvocates.org to learn more about our work.