Who decides which colleges are eligible to receive federal financial aid? This complex question begins with accreditation, part of the postsecondary quality assurance system. Ultimately, accrediting agencies occupy a gatekeeping role by approving institutions of higher education for participation in federal financial aid programs. In the postsecondary education marketplace, quality assurance is represented by a set of three interwoven functions, often referred to as “the Triad”: accreditation through a Federally recognized accreditation agency; authorization by a state or states in which the provider operates; and oversight and approval by the U.S. Department of Education (ED).

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) exists as an independent check on accreditors by determining which should receive federal recognition, thereby fulfilling an important oversight role and making consequential decisions about which colleges and universities can continue participate in federal financial aid programs.

WHAT IS NACIQI?

Established by a Congressional statute in 1992 and maintained in the Higher Education Opportunity Act of 2008, NACIQI is responsible for overseeing the federal accreditation recognition process for institutions of higher education and accrediting agencies. Although the decision ultimately rests with the Secretary of Education, this advisory panel provides recommendations on which national and regional accreditors to recognize and provides general advice to ED on accreditation policy matters and decisions. NACIQI holds meetings to review accreditors’ recognition and performance and make recommendations on approving accreditors to the Secretary of Education.
WHAT HAPPENS AT A NACIQI MEETING?

Applications for Recognition or Renewal of Recognition
NACIQI generally holds public meetings twice a year, once in spring and once in fall.

At meetings, NACIQI members review staff analysis of each accreditors’ application for recognition—including a staff recommendation—and supporting documentation. They may also hear directly from the leadership of an accrediting agency requesting recognition. After a meeting, NACIQI sends their recommendation, along with the staff analysis and recommendation, to a Senior Official at the Department of Education who makes the final decision regarding an accreditor’s recognition. Accreditors which disagree with the Senior Official’s decision may appeal such decision to the Secretary.

Other Matters
NACIQI may also consider other matters beyond recognition applications and renewals during their biannual meetings, such as compliance, subcommittees, and relevant policy conversations.

NACIQI AND THE FUTURE OF POSTSECONDARY QUALITY ASSURANCE

Quality assurance in postsecondary education is complex and involves the checks and balances of many interconnected state, federal and non-governmental agencies, including NACIQI. As a result, higher education relies on a connected web of multiple actors—each using their own definitions of quality—instead of a unified system focused on the interests of students.

Unfortunately, the recognition process itself stresses compliance and bureaucratic procedure more than results and fails to demand a high level of transparency of accreditors and their internal decision-making. For example, accrediting agencies hold hearings in private and closed-door meetings. The scales are still tipped toward exacting regulatory compliance instead of allowing institutions to respond to external changes, such as local workforce needs and new technologies that can assist students and improve outcomes.

To better serve students, policymakers should reform accreditation and the process for receiving recognition to place greater emphasis on outcomes over compliance. As NACIQI represents an integral part of our postsecondary quality assurance system, it will be equally integral in any efforts to improve quality and outcomes at institutions.

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