



Board of Governors Accreditation Commission Recommendations

September 1, 2024

University of North Carolina System
Raleigh, North Carolina

Update on Constituent Institutions Changing Accreditors

[Session Law 2023-132](#) directed the University of North Carolina Board of Governors to “establish a Commission to study alternatives to the current process by which institutions of higher education are accredited and shall invite stakeholders, including stakeholders from other states, to participate.”

At the direction of President Peter Hans, this report is being submitted on behalf of the Board of Governors by the Division of Governmental Affairs in consultation with the Division of Strategy and Policy and the Division of Legal Affairs.

The [interim report](#) submitted in December outlined the actions that the System Office took in 2023. Those items included recruiting research organizations and higher education officials from neighboring states to discuss accreditation reform, drafting a joint Request for Information (RFI) with the North Carolina Community Colleges System Office, and requesting a meeting with the United States Department of Education.

Since then, the following actions have taken place:

1. A [joint RFI](#) was issued by the UNC System Office and North Carolina Community Colleges System Office in December 2023. The RFI was sent to accrediting agencies to gauge interest in accrediting North Carolina’s institutions of higher education and responses were due February 29, 2024. Two accrediting agencies indicated that they are willing to accept accreditation applications from our institutions.
2. The responses to the RFI were forwarded to UNC constituent institutions and universities were asked to choose which accrediting agency best meets their needs. Universities were also asked to provide the System Office with an estimated timeline of implementation. Responses to this request were received in mid-July 2024.
3. Staff from the UNC System Office and North Carolina Community Colleges System Office met with representatives from the United States Department of Education in Washington, D.C. in January 2024. The purpose of this meeting was to learn more about what to expect when institutions seek to switch accreditors, as schools must receive preapproval from the Department prior to switching. Feedback from the Department was forwarded to UNC constituent institutions.
4. The UNC System partnered with the American Enterprise Institute (AEI) to host a discussion in July 2024 between thought leaders from different states to find alternatives to the current process by which institutions of higher education are accredited.
 - a. The following states were represented at the meeting:
 - i. Florida
 - ii. Georgia
 - iii. Iowa
 - iv. North Carolina
 - v. South Carolina
 - vi. Tennessee
 - vii. Virginia

- b. UNC System office staff and AEI have committed to producing a white paper on accreditation reform as a result of the convening. A copy of the paper will be provided to the committee upon publication.

Recommendations

Based on the discussions that took place at the UNC System and AEI's convening as well as lessons learned throughout the process of UNC constituent institutions switching accreditors, the following policy options warrant further consideration:

1. Discuss state government responses designed to end overreach by accrediting agencies.
 - a. Specifically, the responses could address the following:
 - i. Aspects of university governance and operations that should be subject to accreditation standards;
 - ii. Clearly defining that university boards of trustees' fiduciary responsibility is to their respective institution, not an accrediting agency;
 - iii. Establish an expectation that accreditors cannot force institutions to adopt policies or practices that violate the laws of the institutions' state.
2. Establish an accreditation agency formed by state university systems.
 - a. Interested legislatures could provide resources to form a non-profit entity comprised of their state university systems.
 - b. Flagship institutions from member states would then be dually accredited by their current accreditor and this new non-profit entity.
 - c. After the new accrediting agency has successfully accredited its portfolio of universities for two years, it would seek formal recognition from the United States Department of Education.

Questions regarding this effort should be directed to Eric Naisbitt at ewnaisbitt@northcarolina.edu