

Quality Counts

An Overview of Postsecondary Quality Assurance Structures in the United States

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Introduction

Over the past decade, the United States has seen hundreds of postsecondary institution closures, declining returns on investment for college degrees, and decreases in state funding for public universities.¹ In response, state policymakers, advocates, and students have raised concerns about postsecondary institutional quality.² Concurrently, these stakeholders have taken a renewed interest in the roles and responsibilities of the **three entities in the regulatory triad — state governments, accreditors, and the federal government — entrusted with assuring postsecondary quality** (Table 1). Amid this shifting national context, Bellwether sought to better understand the policies, practices, and metrics that states have developed and implemented to support postsecondary quality assurance (QA).

TABLE 1: QUALITY ASSURANCE RESPONSIBILITIES BY ENTITY

Entity	Roles and Responsibilities
States ³	<ul style="list-style-type: none">• Authorize institutions of higher education (IHEs) to operate.• Provide consumer protection oversight through prosecution and enforcement of legal guidelines.
Accrediting Agencies	<ul style="list-style-type: none">• Review and certify academic quality of institutions and programs.
U.S. Department of Education	<ul style="list-style-type: none">• Determine IHEs' eligibility for Title IV Federal Student Aid.• Recognize accrediting agencies (Secretary of Education).

Note: This brief is the first of Bellwether's three-part series, [Quality Counts](#), examining postsecondary QA. It provides an overview of the program integrity triad responsible for assuring the quality of postsecondary institutions. The second brief introduces a taxonomy and framework for categorizing state postsecondary QA efforts, and uses these tools to discuss, at a high level, how states are engaging in this work. The third brief provides specific examples of state action to monitor and enhance postsecondary quality.

What Is Postsecondary QA?

Postsecondary QA refers to the systematic processes and mechanisms that regulatory entities use to monitor, evaluate, and uphold the quality and integrity of postsecondary institutions and programs.⁴

Why Is Postsecondary QA Important?

QA helps to ensure that all students, regardless of their background, have access to high-quality postsecondary educational experiences and opportunities. Specifically, postsecondary regulatory oversight:

- **Safeguards Public Investment** — The federal government invested \$175 billion in higher education during fiscal year (FY) 2021, while state and local governments invested an additional \$311 billion.⁵ Postsecondary regulators use QA mechanisms to maximize the economic and social returns on this substantial investment.
- **Mitigates the Impact of Institutional Disruptions** — Since 2004, nearly 1,000 colleges and 10,000 campuses have closed in the U.S.⁶ Postsecondary regulators take QA enforcement actions to minimize the impact of these institutional closures on students' and employees' lives and facilitate appropriate transitions.
- **Protects Students as Consumers** — Although college graduates typically earn \$30,000 more than high school graduates per year, these benefits accrue unevenly by institution type and credential.⁷ Postsecondary regulators strive to protect students from attending, or if they enroll in, low-quality institutions that provide dubious credentials at exorbitant costs.

In FY22, nearly 19 million students enrolled in higher education⁸ across three different types of IHEs:⁹

- **Public IHEs** — Owned and operated by government entities (typically state and local governments) and receive a share of their funding from the state.¹⁰ Over time, states have significantly decreased the proportion of funding they provide to public IHEs, driving up tuition prices and precipitating higher student debt loads.¹¹
- **Private, nonprofit IHEs** — Owned and operated by private entities, such as foundations, educational organizations, or religious groups, who do not intend to generate financial profits through operation of the institution.
- **Private, for-profit IHEs** — Owned and operated by individuals or corporations who intend to generate financial profits through operation of the institution.¹²

These three types of IHEs serve different shares of college students, both in terms of the total numbers of students served and the financial need of their respective student populations. In FY22, 72% of students enrolled in two- and four-year IHEs attended public institutions, 16% attended private, non-profit IHEs, and 12% attended private, for-profit IHEs.¹³ In that same FY, over half (54%) of the students at private, for-profit IHEs received Pell Grants, a form of federal aid for students with significant financial needs, compared with 35% of students at public IHEs and 23% at private, nonprofit IHEs.¹⁴

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How Do Regulatory Entities Assess Postsecondary Quality?

Postsecondary regulatory entities monitor quality along two dimensions: institutional quality and academic quality (Table 2). Each regulatory body divides its focus between these two categories differently: **state entities** focus on institutional and academic quality, **accreditors** focus almost exclusively on academic quality, and the **federal government** focuses on assessing institutional quality.

TABLE 2: CATEGORIES OF POSTSECONDARY QUALITY

Quality Area	Definition
Institutional Quality	The overall effectiveness of an entire postsecondary institution, including its governance and administrative structures, financial stability, resource management, and effectiveness in fulfilling its mission. ¹⁵ Institutional quality is also commonly referred to as “program integrity.”
Academic Quality	The effectiveness of the educational aspects of a postsecondary institution, including the rigor and effectiveness of its academic programs, student learning outcomes, curriculum design, and faculty qualifications. ¹⁶

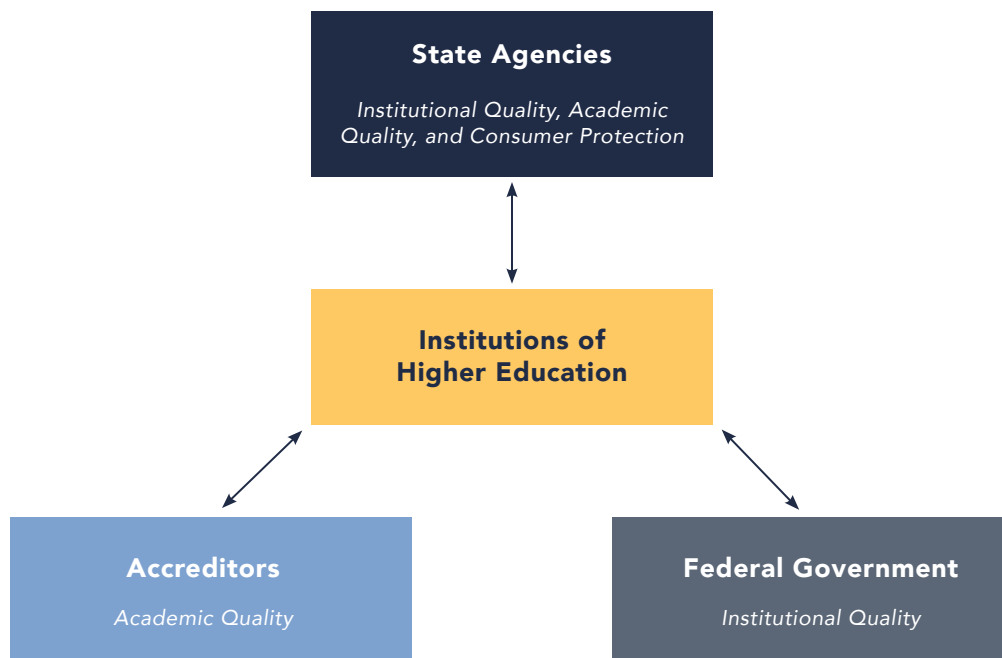
Although IHEs and the three QA regulatory entities seek to achieve institutional and academic quality generally, states and institutions may also adopt unique definitions of quality tailored to their missions, economic needs, and political contexts. For example, many tribal colleges have developed programs in language instruction, cultural revitalization, vocational trades, and technology specifically to strengthen community ties.¹⁷ In Florida, the state’s Department of Education and the Board of Nursing worked

together to improve the efficiency of the state’s nursing programs by revising program requirements in response to nursing shortages experienced during the COVID-19 pandemic.¹⁸ To address these distinct state contexts and institutional priorities, the three QA regulatory entities strive to balance efforts to uphold common standards with providing individualized guidance to institutions.

What Are the Roles and Responsibilities of the Three Regulatory Entities?

In 1965, Congress passed the Higher Education Act (HEA), which outlined the framework of the “program integrity triad” (Figure 1). The program integrity framework outlines that IHEs must be accountable to state governments, accrediting agencies, and the federal government to be eligible for Title IV funding available under the HEA.¹⁹ State governments serve as the vanguard of the program integrity triad’s QA efforts by granting IHEs approval to operate.²⁰ Though not always a linear process, typically, once IHEs receive authorization from state agencies, accreditors evaluate the institution’s or program’s academic standards.²¹ Subsequently, the U.S. Department of Education certifies institutions’ Title IV Federal Student Aid eligibility.²² Reflecting the triad’s sequential responsibilities, this section highlights the state role, discusses accrediting agencies, and concludes with the federal role.

FIGURE 1: THE PROGRAM INTEGRITY TRIAD



The Role of the State

State governments play multiple pivotal roles in ensuring institutional and academic quality, often independent of the regulatory triad framework. Although each state takes QA actions tailored to its own goals and needs, Bellwether identified six common levers, outside of funding, that states use to support institutional and academic quality:

- **Lever 1: Public Governance Structures** — When states establish public institutions, they devise governance systems that guide decision-making, management, and oversight. These governance structures ensure academic and financial integrity, effective leadership, and alignment with the IHE's mission and goals.
- **Lever 2: Authorization and Reauthorization** — To operate within most states, private and out-of-state institutions must receive approval from state agencies in a process known as authorization. Depending on the state, private and out-of-state IHEs may also need to apply for reauthorization, typically every five to seven years.
- **Lever 3: Program Approval and Review** — Many states also have regulatory entities that review and approve specific academic programs, ensuring that individual academic offerings meet quality standards and serve the state's educational and workforce needs.
- **Lever 4: Data Collection, Analysis, and Dissemination** — Each year, state agencies, governing boards, coordinating agencies, governors, and legislatures collect and analyze data from postsecondary institutions and programs to monitor quality. Data reporting informs other state QA levers by enabling regulators to identify concerns and monitor progress.
- **Lever 5: Consolidation and Closures** — Consolidation refers to the process of merging two or more IHEs or campuses into a single entity. Institutions, governance structures, and state agencies may pursue consolidation to reduce costs, improve efficiency, and enhance academic programming.²³ In the event of an institutional closure, states seek to protect students by maintaining records, identifying transfer opportunities, and seeking tuition refunds.
- **Lever 6: Consumer Protection** — States undertake consumer protection efforts to shield students from fraudulent and deceptive practices. State legislatures, attorneys general, and consumer protection agencies may work in concert to provide tuition recovery to defrauded students and prosecute fraudulent actors.

Note: For a deep dive on the levers and metrics states use to support QA efforts, refer to [Quality Counts: State Levers for Postsecondary Quality Assurance](#). To see examples of how states use the QA levers and metrics, refer to [Quality Counts: State Action for Postsecondary Quality Assurance](#).

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The Role of Accrediting Agencies

Independent, nonprofit accrediting agencies assess the academic quality of postsecondary institutions and programs in the U.S. and serve as the gatekeepers of institutional access to federal Title IV funding.²⁴ The U.S. Department of Education recognizes two types of accreditors: institutional and programmatic/specialized (Table 3). All recognized accrediting agencies conduct institutional site visits, review data, and solicit self-assessments to measure institutional or programmatic quality.²⁵

TABLE 3: TYPES OF POSTSECONDARY ACCREDITORS

Accreditor Type	Overview	Examples
Institutional Accreditors	Review postsecondary institutions across an entire campus or at the system level. Operate either nationally or in specific geographic areas. The U.S. Department of Education currently recognizes 38 institutional accreditors. ²⁶	Middle States Commission on Higher Education; the New England Commission of Higher Education; Accrediting Commission of Career Schools and Colleges; the Distance Education Accrediting Commission ²⁷
Programmatic/Specialized Accreditors	Evaluate specific programs, departments, or schools within a larger IHE, such as medical sciences, education, law, music, and art. ²⁸ The U.S. Department of Education currently recognizes 32 programmatic accreditors. ²⁹	The American Bar Association; the American Dental Association; the Montessori Accreditation Council for Teacher Education ³⁰

Authors' Note: As of 2020, the U.S. Department of Education no longer distinguishes between regional and national institutional accreditors and refers to them all as "institutional accreditors."³¹

The Role of the Federal Government

The U.S. Department of Education oversees IHEs on behalf of the federal government, which provides more than \$110 billion annually in federal student aid to help defray the student cost of postsecondary education.³² Five federal entities play critical roles in postsecondary QA:

- **U.S. Department of Education’s Office of Federal Student Aid** — Supports institutional quality by examining IHEs’ financial stability, operational functions, and compliance with federal higher education laws to verify that programs receiving federal student aid funds meet minimum standards.³³ Among the key requirements, IHEs must maintain a minimum Financial Responsibility Composite Score (or remit a letter of credit) and receive accreditation from a Department-recognized accreditor to be eligible to enroll students who receive Title IV federal student aid.³⁴
- **National Advisory Committee on Institutional Quality and Integrity (NACIQI)** — Supports academic and institutional quality by serving as an advisory body for accreditation-related and institutional Title IV eligibility concerns. NACIQI makes recommendations to senior U.S. Department of Education officials and the Secretary of Education on a variety of QA matters.³⁵
- **U.S. Department of Education’s Office of Postsecondary Education** — Strives to strengthen the capacity of colleges and universities and expand access to postsecondary instruction.³⁶ Within the Office of Postsecondary Education, the Accreditation Group oversees the recognition process for accreditors by maintaining the list of recognized accreditors and supporting NACIQI’s operations.
- **Consumer Financial Protection Bureau** — Oversees the lending practices of IHEs, particularly those extending private loans directly to students.³⁷ This oversight arose due to past abuses at certain for-profit schools, where students were subjected to high interest rates and aggressive debt collection practices.³⁸
- **Federal Trade Commission (FTC)** — Protects against deceptive marketing practices by taking legal action against IHEs that make false statements about their graduates’ employment outcomes.³⁹ The FTC’s Safeguards Rule ensures IHEs participating in federal student financial aid programs (Title IV institutions) implement robust cybersecurity measures to protect customer information.⁴⁰

The U.S. Department of Education, state regulators, and accrediting agencies all face considerable capacity constraints that hinder their ability to effectively oversee postsecondary institutional quality.

Constraints on QA Efforts

Despite the importance of postsecondary QA, state bodies, accrediting agencies, and federal entities face substantial barriers to supporting continuous institutional and program improvement. The following main barriers pose challenges to existing quality improvement structures and efforts.

Capacity Constraints on the Program Integrity Triad

The U.S. Department of Education, state regulators, and accrediting agencies all face considerable capacity constraints that hinder their ability to effectively oversee postsecondary institutional quality. At the federal level, the Office of Federal Student Aid's limited capacity has prevented it from keeping up with the "scope and scale of problems in higher education in the country."⁴¹ Increasing numbers of student loan borrowers and new delivery models have further exacerbated the U.S. Department of Education's capacity.⁴²

Accrediting agencies largely rely on a volunteer workforce under a limited budget, restricting their ability to evaluate IHEs in a thorough and timely manner.⁴³ Moreover, resource scarcity exacerbates the natural tension inherent in the oversight of fee-paying institutional members. Finally, although many states require IHEs to report data, state authorizing agencies often lack the staffing necessary to meaningfully analyze the data they receive. Many states also continue to operate without a robust digital infrastructure for authorization and data collection, delaying processes and hindering sufficient oversight.

To address these capacity concerns, QA advocates nationwide can work to financially and legally bolster oversight capabilities across the program integrity triad.

Reverence for Institutional Autonomy

Interviewed QA experts noted that IHE regulators, who often have experience serving as professors or administrators themselves, have a strong reverence for institutional autonomy and faculty independence. This reverence may compel regulators to defer to institutions' own decision-making and avoid taking necessary enforcement actions. **Regulators can still pursue QA by monitoring data over time, providing clear guidance to institutions, and collaborating with an IHE's governance structures.**

Lack of Improvement and Enforcement Mechanisms

Experts also conveyed that regulators often have few enforcement mechanisms at their disposal aside from revoking an IHE's authority to operate or ability to receive federal student aid. Although consumer protection lawsuits serve as a strong QA enforcement mechanism, they can only occur after providers have harmed students. States sometimes feel they have limited courses of action aside from closing an institution or tying outcomes to funding. **In collaboration with accreditors and the federal government, states can architect mutually supportive structures to incentivize IHEs to engage in continuous quality improvement.**

Insufficient Communication Within and Across the Program Integrity Triad

Experts highlighted the potential for increased communication among state authorizers, state attorneys general, the U.S. Department of Education, accrediting agencies, postsecondary institutions, and professional licensure bodies. **Regulatory bodies can achieve systemic benefits by coordinating their efforts to collectively promote QA instead of working in silos.**

Conclusion

Postsecondary QA is intended to ensure that all students have access to high-quality experiences by maintaining institutional stability, safeguarding public investment, and protecting students as consumers. However, the program integrity triad currently faces considerable challenges in capacity, enforcement, and communication, resulting in a QA system that under serves postsecondary students as well as state and national educational goals. Policymakers must redouble investments in postsecondary QA to secure continuous quality improvement. ✨

Endnotes

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About Bellwether

Bellwether is a national nonprofit that exists to transform education to ensure systemically marginalized young people achieve outcomes that lead to fulfilling lives and flourishing communities. Founded in 2010, we work hand in hand with education leaders and organizations to accelerate their impact, inform and influence policy and program design, and share what we learn along the way. For more, visit bellwether.org.

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