

The logo for 'Light THE Fire' features the words 'Light' and 'Fire' in a bold, orange, sans-serif font. The word 'THE' is smaller and positioned between 'Light' and 'Fire'. To the right of the text is a stylized sunburst or fireball graphic with a glowing orange and yellow center and radiating lines.A portrait of Christopher Lambert, a man with a bald head, glasses, and a goatee, wearing a suit and tie. He is smiling and looking towards the camera. The background behind him is a dark field with many thin, radiating lines of light in shades of yellow and orange, creating a sunburst effect.

Collaborative Compliance: Fostering Strong Relationships with the Regulatory Triad

Christopher Lambert– Principal, BCC Advisory

COLLABORATIVE COMPLIANCE

Fostering Strong Relationships with the Regulatory Triad

CAPPS
40TH ANNUAL CONFERENCE

Light THE Fire

October 2 - 4, 2024



goals.

- Provide an Overview of the Ever-Shifting Higher Education Landscape
- Share Best Practices for Sustained Success
- Q and A



THE EVER SHIFTING

HIGHER

EDUCATION

LANDSCAPE



REGULATORY TRIAD



FEDERAL GOV'T



ACCREDITATION




STATE REGULATORS

Accreditation Peer-Review

REGULATORY TRIAD:
STUDENT CENTERED QUALITY
ASSURANCE

CONSUMER PROTECTION

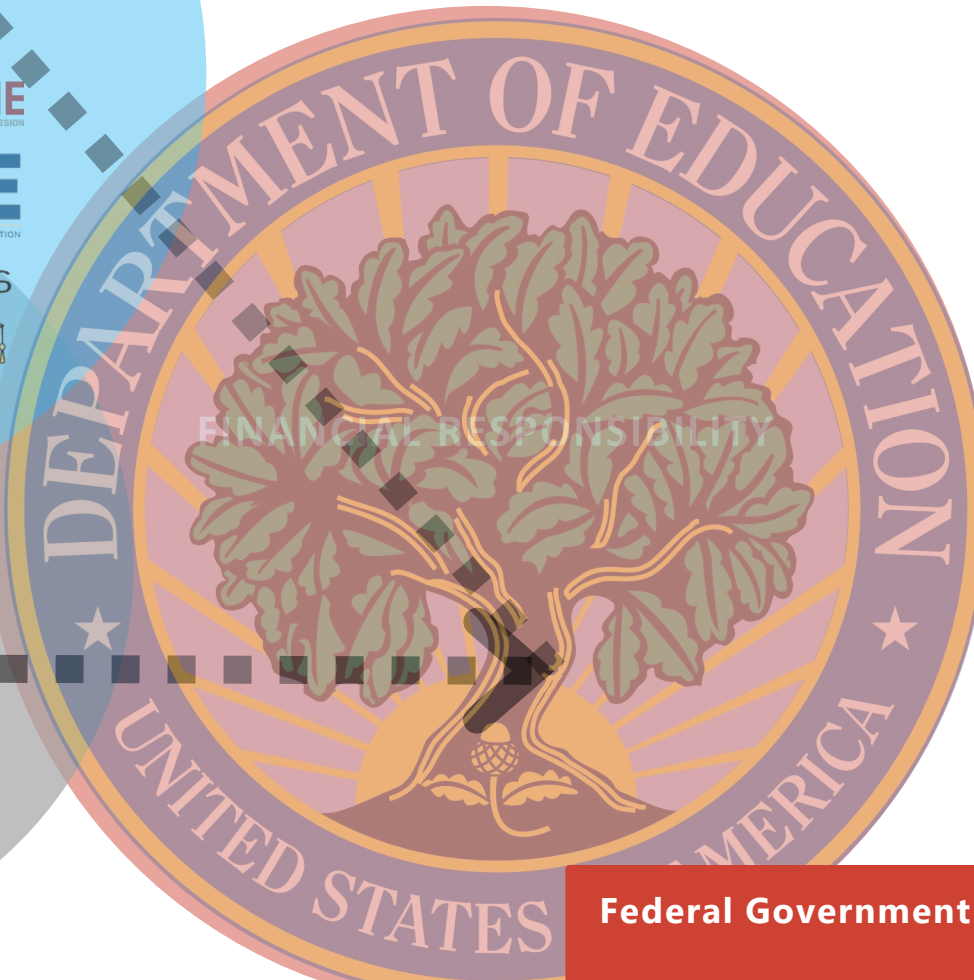


BPPPE

ACADEMIC QUALITY



STUDENT EDUCATIONAL EXPERIENCE



State Government

Federal Government

Traditional Pathway

State Licensure



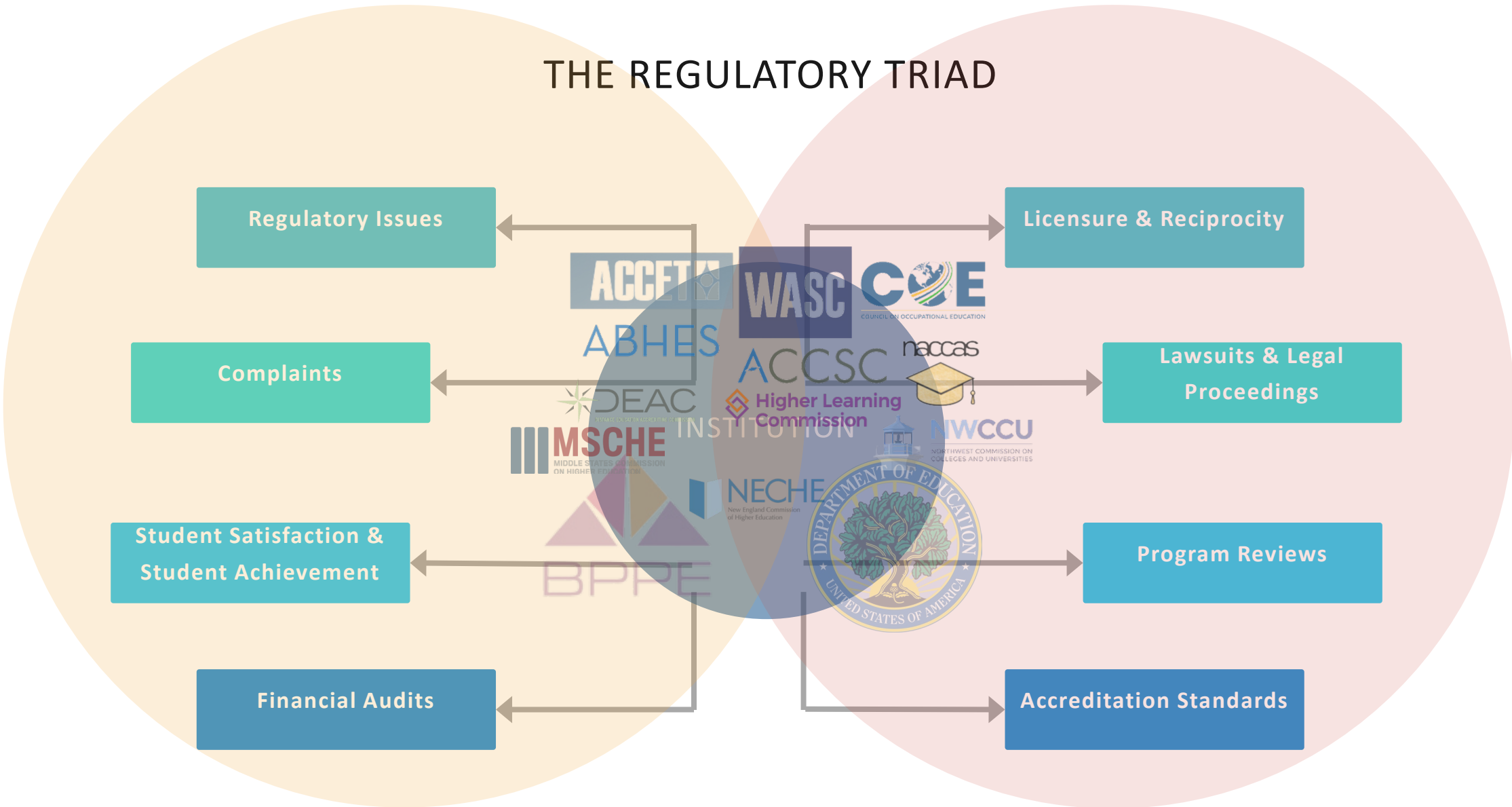
Accreditation



Federal Funding



THE REGULATORY TRIAD



Regulatory Issues

Complaints

Student Satisfaction & Student Achievement

Financial Audits

ACCETM

ABHES

DEAC

MSCHE
MIDDLE STATES COMMISSION
ON HIGHER EDUCATION

BPPE

WASC

ACCSC

Higher Learning
Commission

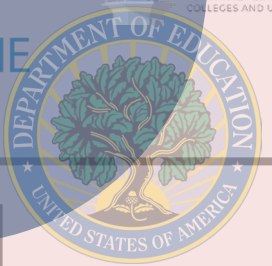
NECHE
New England Commission
of Higher Education

COE
COUNCIL ON OCCUPATIONAL EDUCATION

naccas



NWCCU
NORTHWEST COMMISSION ON
COLLEGES AND UNIVERSITIES



Licensure & Reciprocity

Lawsuits & Legal Proceedings

Program Reviews

Accreditation Standards

Higher Education Accreditation is changing in **Radical** ways.

- Questions on the Value of Higher Education
- Student Satisfaction is a Growing Concern
- Constant Pressure on Accreditation
 - School Closures and Teach-Outs
- Focus on Consumer Protection by All Members of the Triad

The Increased Federalization of Higher Education



NACIQI - Recognizing Accreditors

Agencies must demonstrate compliance with the Secretary's Recognition of Accrediting Agencies under **Title 34, Subtitle B, Chapter 6, Part 602, Subpart B, § 602.10 - § 602.29**

AND

- How each agency has embraced critical higher education concepts such as institutional autonomy, equity and access, diversity, student debt, debt to earnings ratios, and increased transparency;
- Increasingly, and broadly, how does the agency determine successful student achievement and hold schools accountable to those outcomes?

Accreditors

We want schools to **do a better job** to serve the students that they have enrolled.

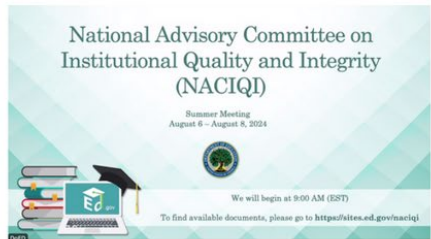
National Advisory Committee on Institutional Quality and Integrity (NACIQI)

Summer 2024 Meeting

The federalization of accreditation continues to change higher education in significant and permanent ways, and not necessarily for the betterment of the student educational experience and student learning.



CHRISTOPHER D. LAMBERT
PRINCIPAL / BCC ADVISORY



From August 6-8, 2024, the National Advisory Committee on Institutional Quality and Integrity (NACIQI) met virtually for its Summer 2024 meeting. NACIQI, authorized and reconstituted by the Higher Education Opportunity Act of 2008, is charged with providing recommendations to the U.S. Secretary of Education (Secretary) regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes. Critically, NACIQI's primary focus in advising Secretary on matters concerning accreditation centers on the Secretary's recognition process for accrediting agencies[1], and institutional eligibility for federal student aid[2].

As part of its 3-day agenda, and of significant importance to the private postsecondary career college sector, was the consideration of the renewal of recognition of the Accrediting Council for Continuing Education and Training (ACCET).

Ultimately, NACIQI accepted the recommendation from the Staff Report, voting unanimously to recommend to the Senior Department Official at the US Department of Education that ACCET's recognition as a nationally recognized accrediting agency be continued, to require the agency to come into compliance within 12 months with the criteria listed, and submit a compliance report due 30 days thereafter.

NACIQI: Ensuring Quality Through Accrediting Agency Recognition

As defined[3] by the federal government, via the US Department of Education (Department), the goal of postsecondary accreditation is to ensure that institutions of higher education meet acceptable levels of quality. Accrediting agencies are private, non-governmental, non-profit, educational associations that develop evaluation criteria that align with required federal regulations for recognized accreditors, and conduct peer evaluations to assess whether or not those criteria are met. Under the HEA, the Department recognizes

(approves) accrediting agencies that the Secretary determines to be reliable authorities as to the quality of education or training provided by institutions of higher education, and the Department publishes a list of nationally recognized accrediting agencies[4]. Recognized accrediting agencies serve along with federal and state government agencies as one of the three main elements of "the Triad" that provides oversight governing the Higher Education Act's (HEA's) federal student aid programs. Under the Triad, in order for students to receive federal student aid from the Department for postsecondary study, the institution must be licensed by a state regulatory agency and accredited by a "nationally recognized" accrediting agency.

NACIQI Membership

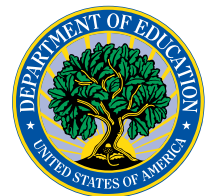
NACIQI is composed of 18 members with 6 year membership terms who are appointed equally by the Secretary, House of Representatives, and the Senate as follows[5]: Secretary - 6 appointees with three-year initial terms, including the student member.

Accreditor Dashboard

National Advisory Committee on Institutional Quality and Integrity

AY2022-23 [Title IV Campus-Based Volume],

- Graduation Rates and Earnings
- Debt to Earnings by Credential Level
- Debt and Net Price
- # of Schools by Title IV Volume
- Institutions with Greater than \$200 Million in Title IV Student Aid Volume by Accreditor



ABHES

Institutions **132**
 Undergraduates **94,241**
 Graduates **534**

Locations **249**
 Under Cash Monitoring **3**
 Title IV Volume (\$B) **1.46**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



ACGET

Institutions **57**
 Undergraduates **42,273**
 Graduates **0**

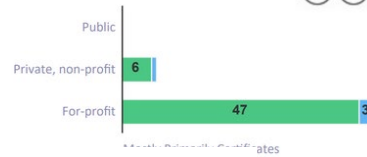
Locations **78**
 Under Cash Monitoring **0**
 Title IV Volume (\$B) **0.45**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



ACCSC

Institutions **338**
 Undergraduates **208,647**
 Graduates **2,810**

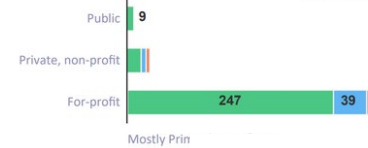
Locations **509**
 Under Cash Monitoring **3**
 Title IV Volume (\$B) **2.88**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



COE

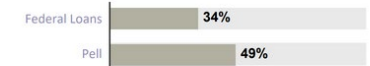
COUNCIL ON OCCUPATIONAL EDUCATION

Institutions **401**
 Undergraduates **116,303**
 Graduates **0**

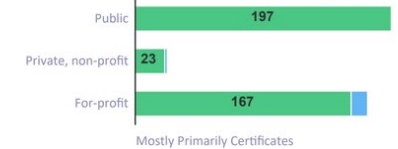
Locations **498**
 Under Cash Monitoring **4**
 Title IV Volume (\$B) **0.76**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



DEAC

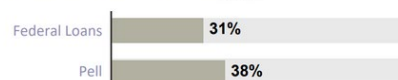
DISTANCE EDUCATION ACCREDITING COMMISSION

Institutions **20**
 Undergraduates **20,129**
 Graduates **6,668**

Locations **20**
 Under Cash Monitoring **1**
 Title IV Volume (\$B) **0.14**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



Institutions **721**
 Undergraduates **109,903**
 Graduates **0**

Locations **915**
 Under Cash Monitoring **14**
 Title IV Volume (\$B) **1.02**



% Of Students Who Received _____ **UG**



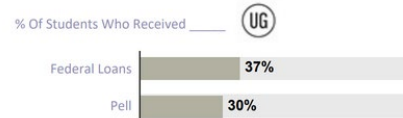
Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control



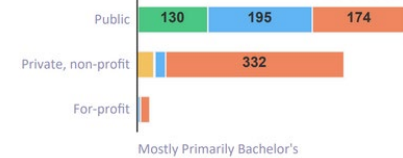


Institutions **911**
 Undergraduates **3,578,787**
 Graduates **944,333**

Locations **1,167**
 Under Cash Monitoring **5**
 Title IV Volume (\$B) **30.41** (UG) (G)

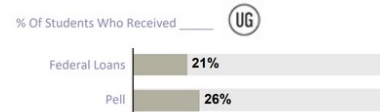


Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control (UG) (G)

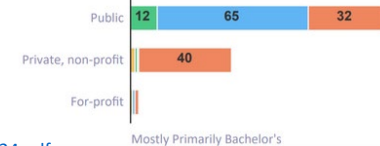


Institutions **157**
 Undergraduates **879,636**
 Graduates **155,028**

Locations **174**
 Under Cash Monitoring **0**
 Title IV Volume (\$B) **5.28** (UG) (G)

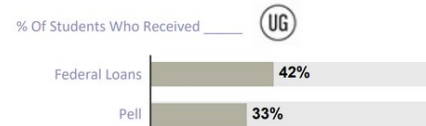


Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control (UG) (G)

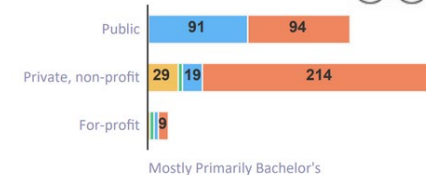


Institutions **471**
 Undergraduates **1,934,028**
 Graduates **610,463**

Locations **674**
 Under Cash Monitoring **3**
 Title IV Volume (\$B) **19.13** (UG) (G)

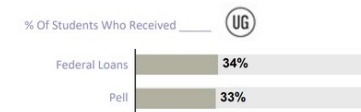


Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control (UG) (G)

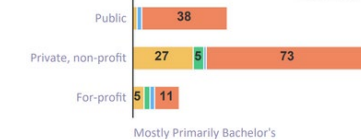


Institutions **169**
 Undergraduates **914,662**
 Graduates **329,866**

Locations **217**
 Under Cash Monitoring **2**
 Title IV Volume (\$B) **9.76** (UG) (G)

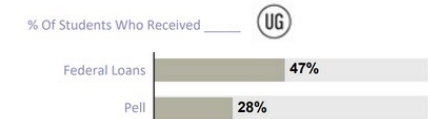


Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control (UG) (G)

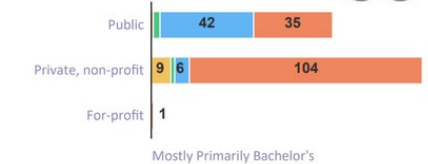


Institutions **203**
 Undergraduates **747,408**
 Graduates **247,813**

Locations **219**
 Under Cash Monitoring **0**
 Title IV Volume (\$B) **6.90** (UG) (G)



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only Schools by Control (UG) (G)



All Currently Operating Institutions of Higher Education

Institutions
4,997

Undergraduates
13,797,833

Graduates
3,207,700

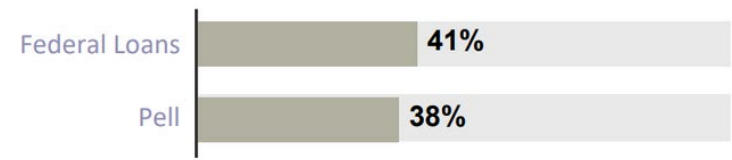
Locations
6,303

Under Cash Monitoring
46

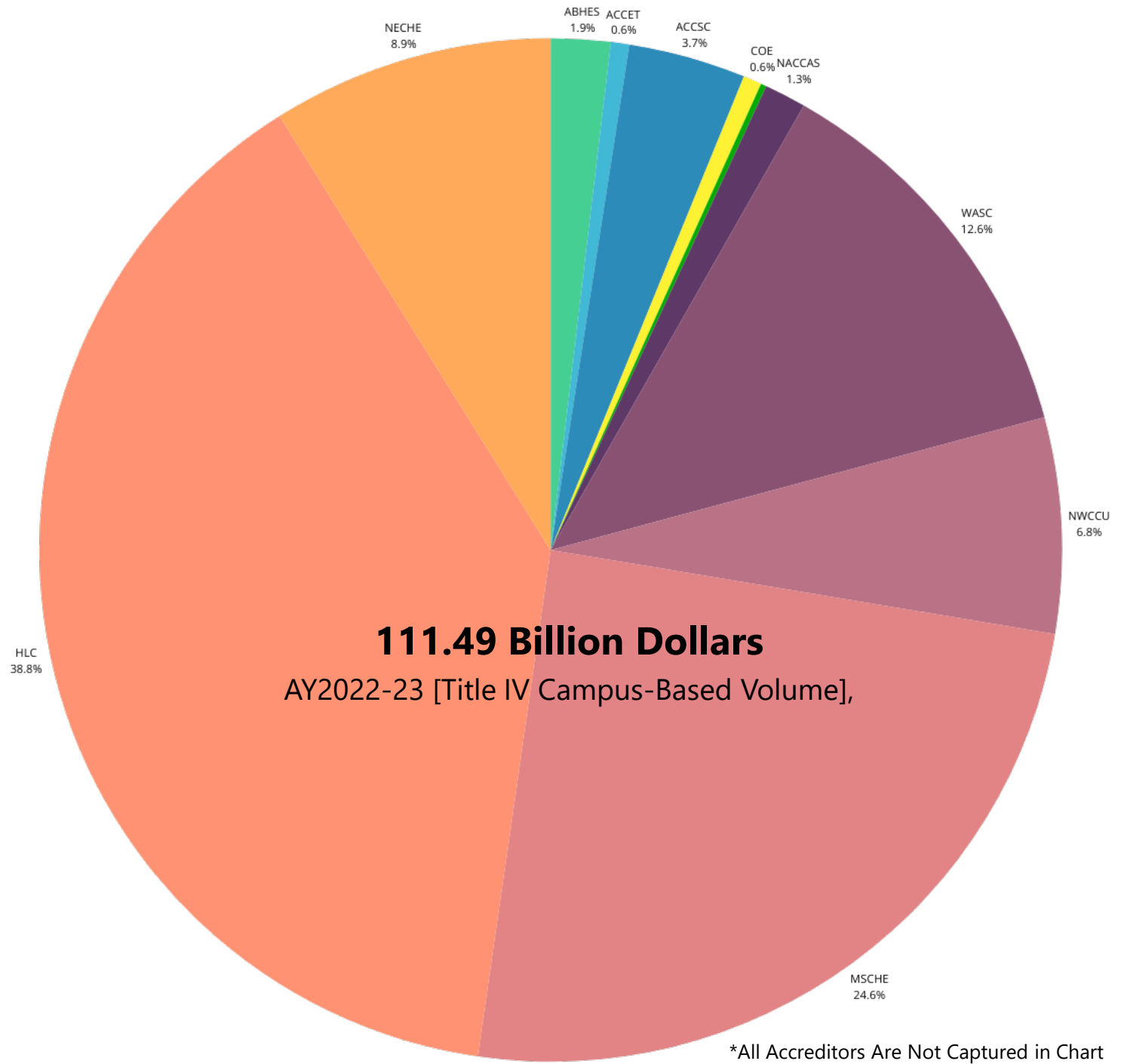
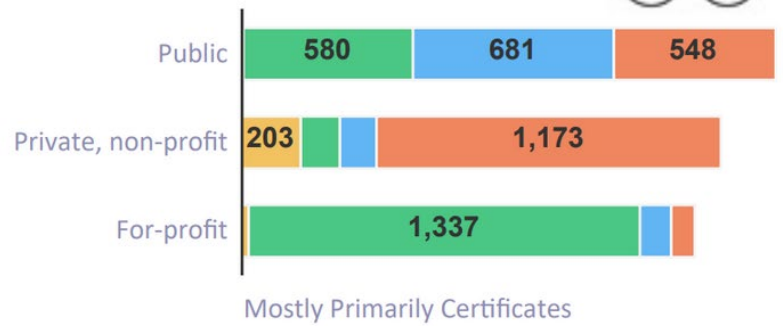
Title IV Volume (\$B) **111.49**



% Of Students Who Received _____ **UG**



Primarily Certificates vs. Associates vs. Bachelor's vs. Graduate Only
Schools by Control



*All Accreditors Are Not Captured in Chart

Checking In on the Biden Administration's Higher Education Regulatory Agenda

By Michael Brickman

AEIdeas

July 11, 2024

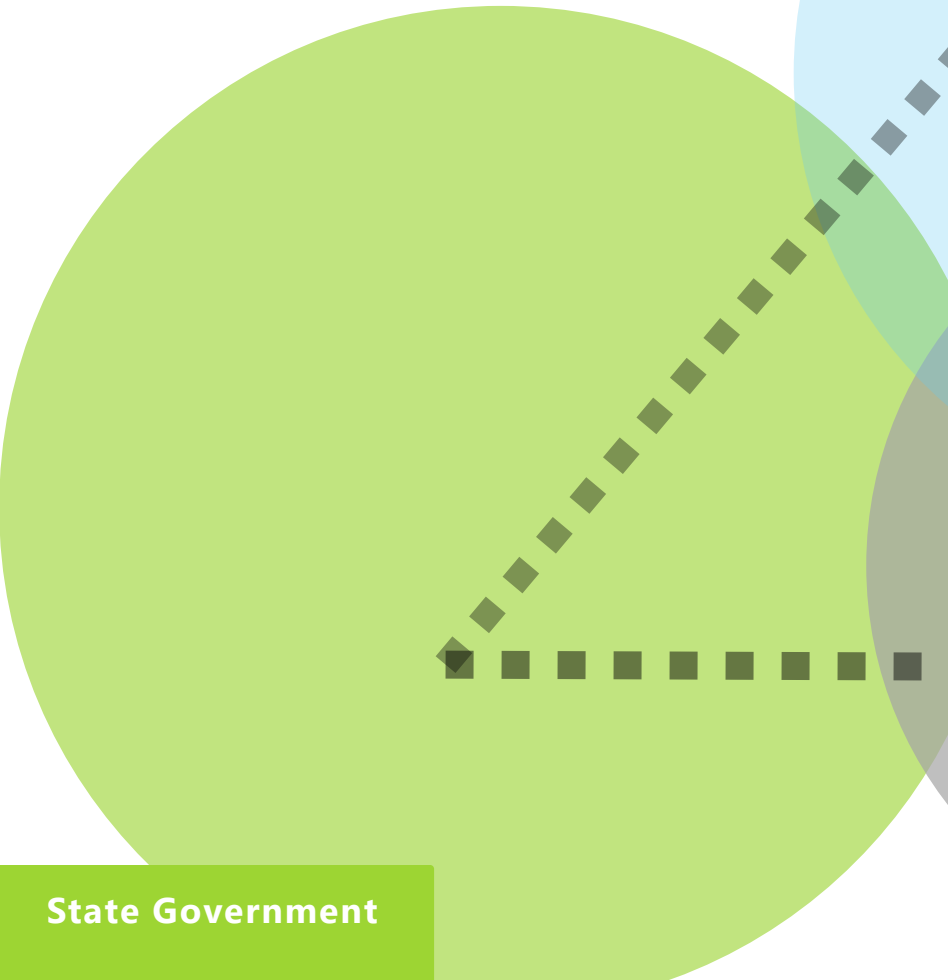
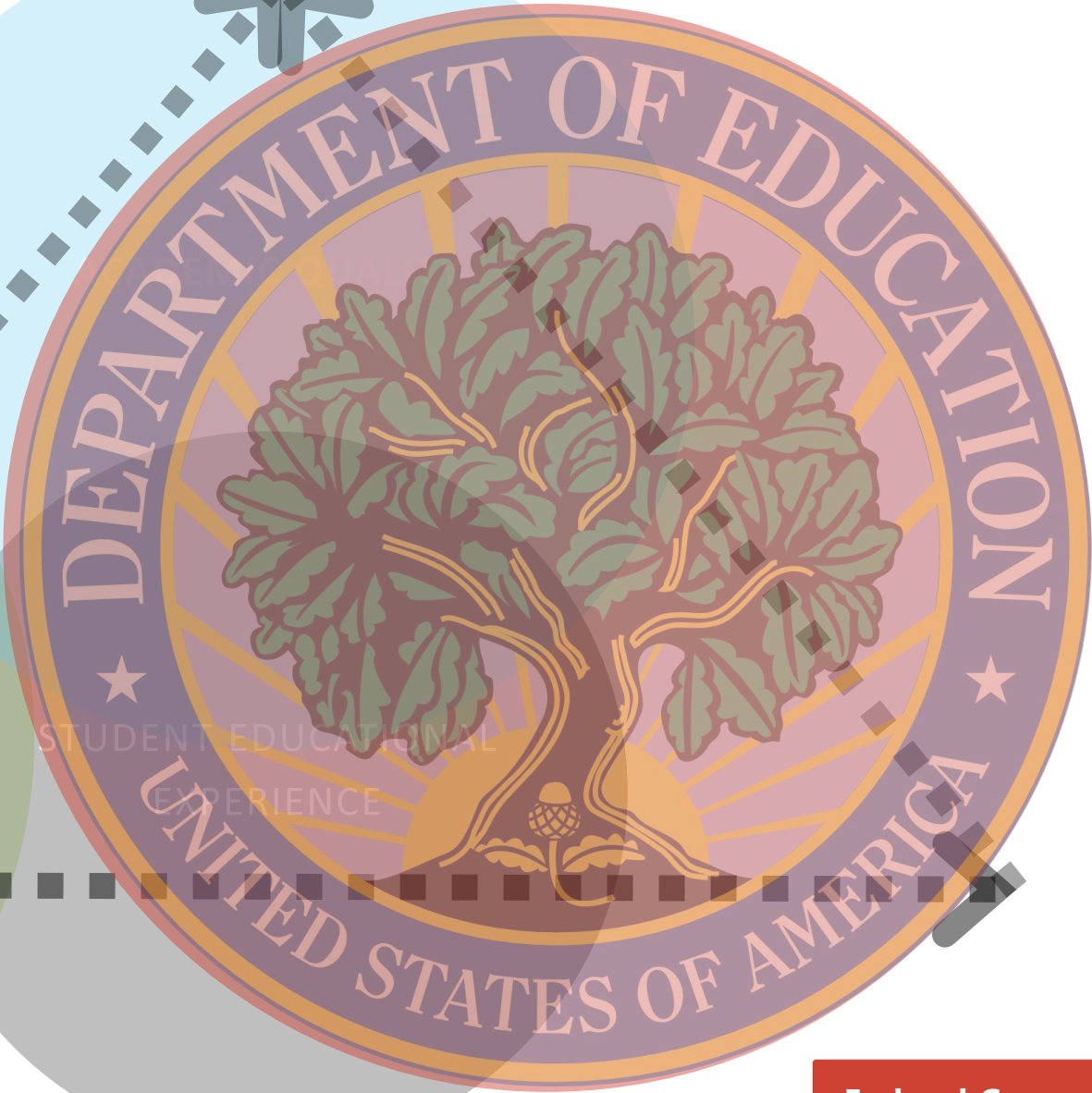


Agency	Agenda Stage of Rulemaking	Title	RIN
ED/OESE	Proposed Rule Stage	Innovative Assessment Demonstration Authority	1810-AB60
ED/OESE	Proposed Rule Stage	Office of Indian Education Professional Development Program	1810-AB70
ED/OESE	Final Rule Stage	Impact Aid Program	1810-AB66
ED/OSERS	Proposed Rule Stage	Amendments to Definitions Under the Randolph-Sheppard Vending Facility Program and Related Provisions of That Program and to the State Vocational Rehabilitation Services Program	1820-AB83
ED/OSERS	Final Rule Stage	Individuals With Disabilities Education Act	1820-AB82
ED/OCTAE	Proposed Rule Stage	Carl D. Perkins Career and Technical Education Act of 2006	1830-AA33
ED/OPE	Proposed Rule Stage	Documentation of Foreign Source Gifts and Contracts	1840-AD50
ED/OPE	Proposed Rule Stage	Federal TRIO Programs	1840-AD68
ED/OPE	Proposed Rule Stage	Accreditation and Related Issues	1840-AD82
ED/OPE	Proposed Rule Stage	State Authorization	1840-AD83
ED/OPE	Proposed Rule Stage	Return to Title IV	1840-AD85
ED/OPE	Proposed Rule Stage	Cash Management	1840-AD86
ED/OPE	Proposed Rule Stage	Third-Party Servicers and Related Issues	1840-AD87
ED/OPE	Proposed Rule Stage	Distance Education	1840-AD92
ED/OPE	Proposed Rule Stage	Student Debt Relief Hardship	1840-AD95
ED/OPE	Final Rule Stage	Direct Grant Programs, State-Administered Formula Grant Programs	1840-AD72
ED/OPE	Final Rule Stage	Public Service Loan Forgiveness – Employer Eligibility	1840-AD91
ED/OPE	Final Rule Stage	Student Debt Relief	1840-AD93
ED/OPE	Final Rule Stage	National Resource Centers Program and Foreign Language and Area Studies Fellowships Program	1840-AD94
ED/FSA	Proposed Rule Stage	Cybersecurity Standards for Institutions of Higher Education to Comply With EO 13556 and NIST 800-171	1845-AA25
ED/OCR	Proposed Rule Stage	Discrimination Based on Shared Ancestry or Ethnicity in Response to EO 13899 on Combating Anti-Semitism and EO 13985 on Advancing Racial Equity and Support for Underserved Communities	1870-AA15
ED/OCR	Proposed Rule Stage	Nondiscrimination on the Basis of Sex and Disability in Programs or Activities Receiving Federal Financial Assistance	1870-AA17
ED/OCR	Proposed Rule Stage	Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance From the Department of Education	1870-AA18
ED/OPEPD	Proposed Rule Stage	Protection of Pupil Rights Amendments	1875-AA13
ED/OPEPD	Proposed Rule Stage	Family Educational Rights and Privacy Act	1875-AA15
ED/OPEPD	Final Rule Stage	EDGAR Revisions	1875-AA14
ED/OS	Final Rule Stage	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	1894-AA11

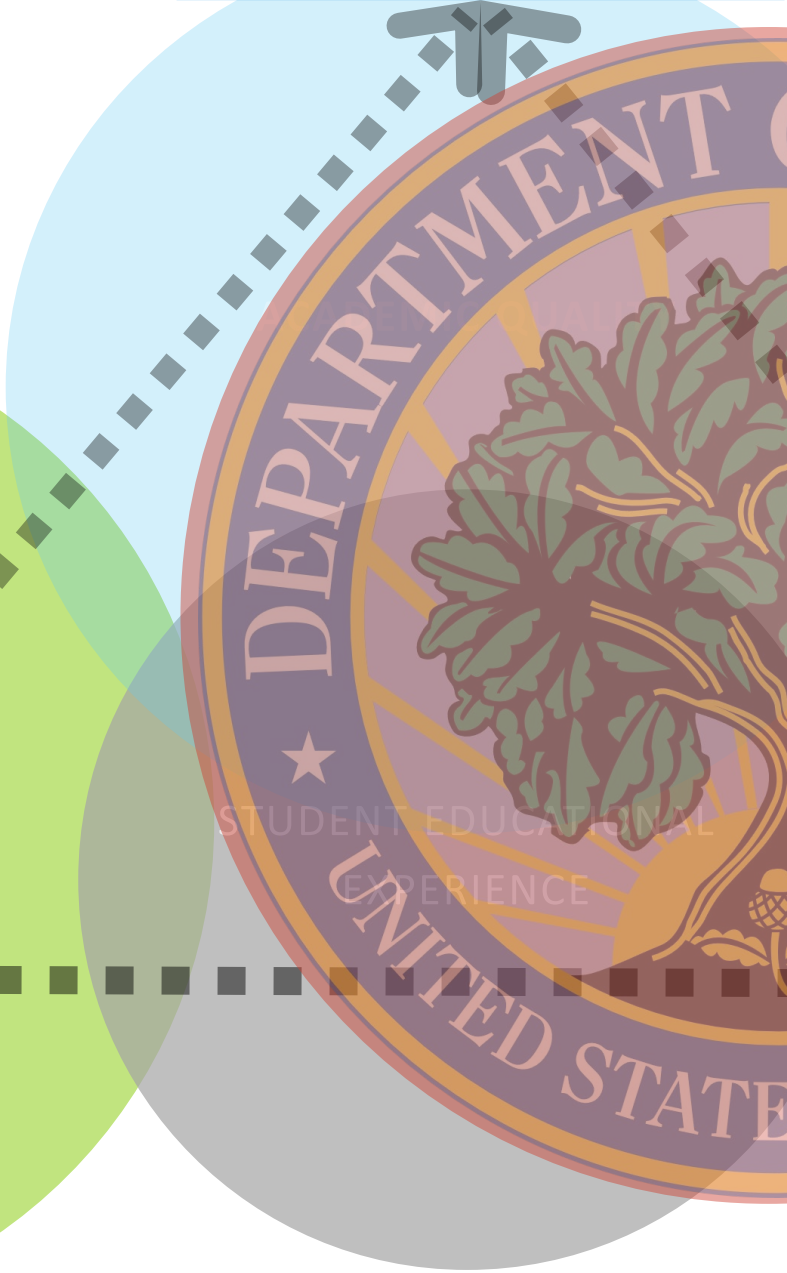


13 Proposed or Final Rules out of the Office of Postsecondary Education

Accreditation - Peer Review



State Government



Federal Government

Traditional Pathway

State Licensure



Accreditation



Federal Funding



THE REALITY

NC-SARA

Consumer Protection?

State Licensure

Consumer Protection



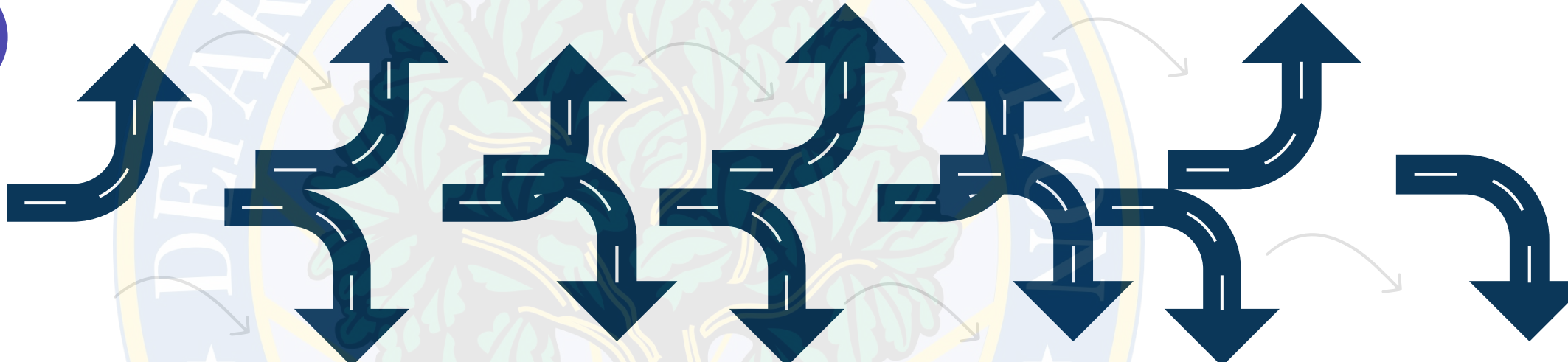
Progressive "Think Tanks"

Consumer Protection, Value of Education, Accreditors Have Failed



Accreditors

Quality of Education and Increasingly, Consumer Protection



Consumer Advocates

Consumer Protection

Plaintiff Attorneys

Consumer Protection

CFPB

Consumer Protection



Veteran Affairs

Consumer Protection

The 4th Estate

Consumer Protection



Federal Government

Access (FAFSA)
Financial Responsibility
Consumer Protection

FTC

Consumer Protection

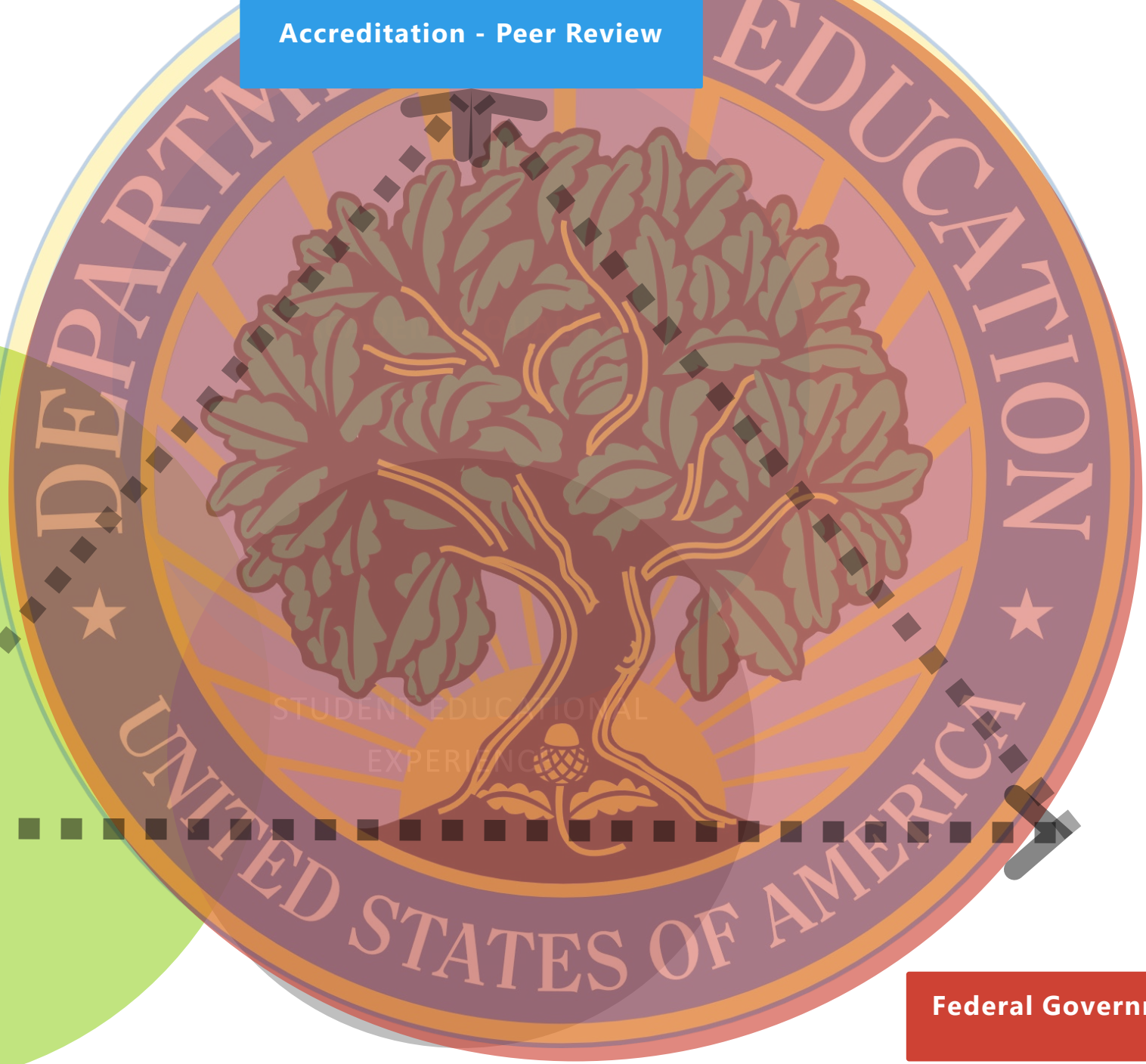
Congress

Consumer Protection

OIG



Accreditation - Peer Review



State Government

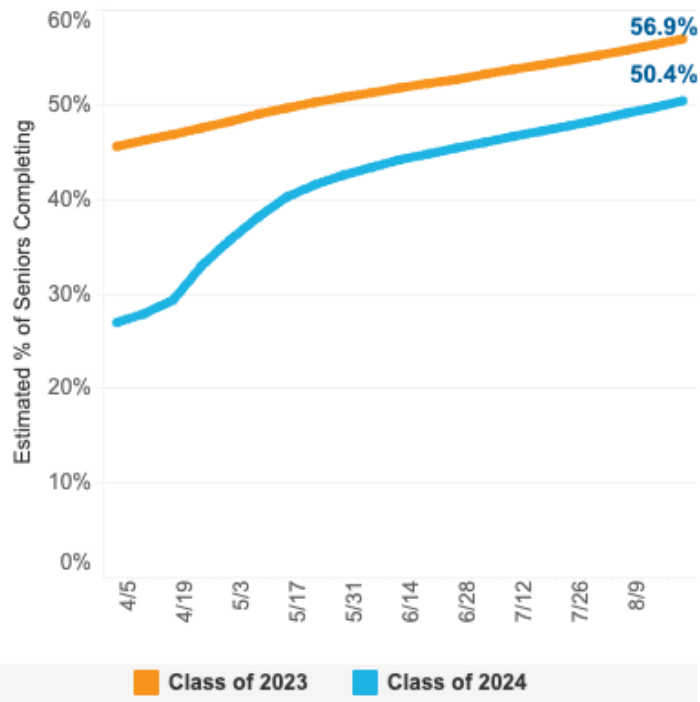
Federal Government



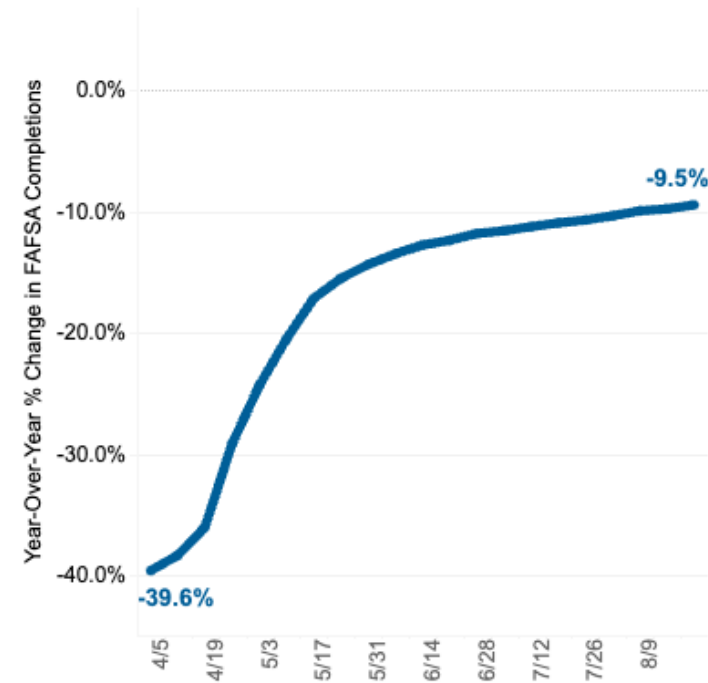
Through August 16th, **50.4%** of the high school class of 2024 completed a FAFSA. 2,097,915 completions nationally, a **-9.5%** change compared to last academic year.

California : % of Seniors Completing: 54%
Y/Y % Chg: **-8.4%**

Estimated Percent of Seniors Completing a FAFSA



Year-Over-Year % Change in FAFSA Completions



1	2	3	4	5
PR	TN	LA	DC	DE
72.0%	61.4%	60.4%	58.8%	58.6%

1	2	3	4	5
IN	ND	MN	DC	OR
-1.0%	-2.7%	-5.7%	-6.0%	-7.1%

F Forbes
<https://www.forbes.com> › Business

College Admissions Could Drop After Disastrous FAFSA ...

Apr 29, 2024 — Only 32.9% of the country's high school seniors had completed the FAFSA as of April 19, the data shows, 29% fewer than last academic year.

N National College Attainment Network
<https://www.ncan.org> › news › New-Data-FAFSA-Compl...

FAFSA Completions Down 40% Through End of March

Apr 8, 2024 — FAFSA submissions through March 29 show a 27% decline. About 35% of the class of 2024 has submitted a FAFSA through date compared to 49% last ...

CNN CNN
<https://www.cnn.com> › 2024/04/20 › politics › fafsa-ap...

Fewer students are filing the 2024 FAFSA

Apr 20, 2024 — The rollout of the new version of the FAFSA was delayed. The form wasn't available until three months later than the usual October 1 date.

WP The Washington Post
<https://www.washingtonpost.com> › ... › Higher Education

Colleges fear FAFSA fiasco may hurt enrollment and revenue

Jun 10, 2024 — Schools that serve lots of students who rely on financial aid worry that troubles with the new FAFSA form will hit their bottom lines.

IHE Inside Higher Ed
<https://www.insidehighered.com> › news › 2024/04/05

Plunge in FAFSA completion could spark an enrollment crisis

Apr 5, 2024 — This year, completion is down to 40 percent of high school students, a decline of 43.7 points—the largest year-over-year drop of any state.

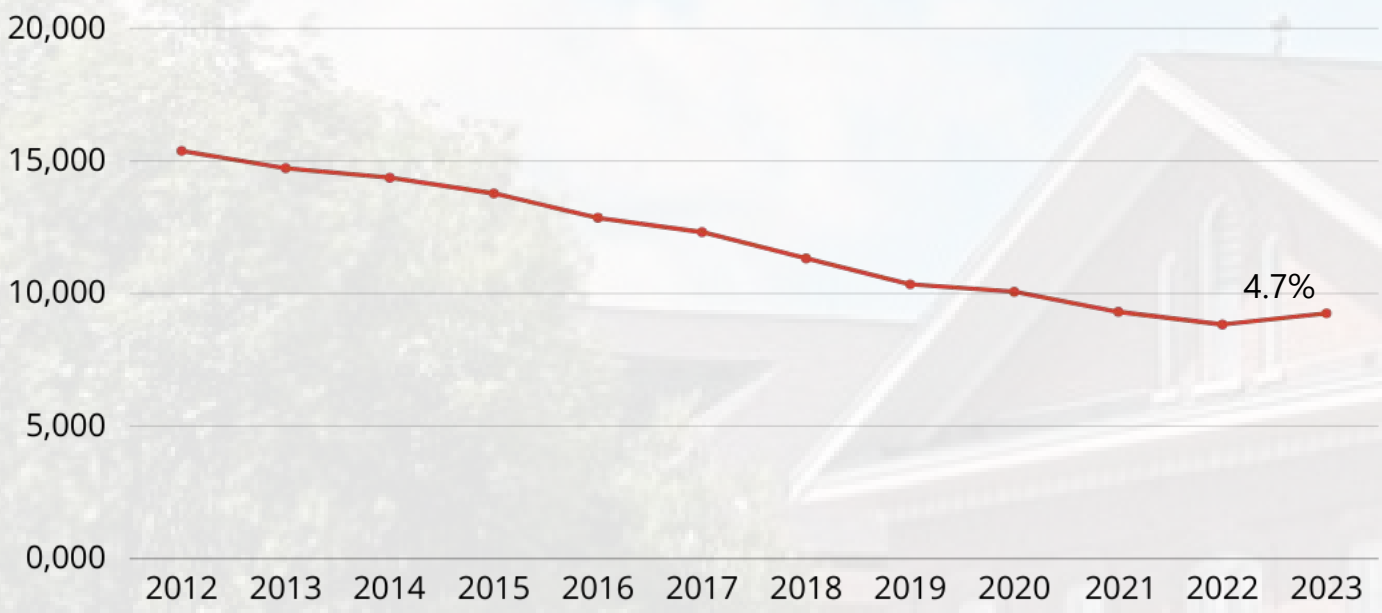


- Just **29%** of families say the updated FAFSA was easier to complete, Sallie May survey finds
- **36%** of students saying the scholarships and financial aid they receive play a role in their ultimate decision

But as the 2024-25 academic year begins, a more immediate concern exists over IUP's likely fall enrollment — uncertainty that Driscoll blames mainly on a deeply flawed rollout of the revamped federal financial aid form, the Free Application for Federal Student Aid (FAFSA).

Speaking Friday to a campus audience, he called it a **“debacle.”**

Dr. Michael Driscoll, President, IUP



The Washington Post

Democracy Dies in Darkness

LETTERS TO THE EDITOR [Opinions](#) [D.C., Md. & Va. Opinions](#) [Submit a letter](#) [Submit a guest opinion](#) [Guest opinion guidelines](#)

Opinion | The federal government's financial aid failure is a disgrace

Colleges need to step up to make sure students are confident they can afford higher education.

Without the promise of federal aid and the offers of private aid FAFSA is used to calculate, college can seem unattainable for students from working-class families.

And when fewer of these students pursue higher education, their chances for upward mobility are significantly reduced.

Marvin Krislov
President
Pace University



COMMONWEALTH of VIRGINIA

Office of the Governor

"...the Department's actions have caused many families to **struggle with receiving timely and accurate award letters,**"

"This has led to **reduced student enrollment** this fall, particularly among those **from low-income backgrounds**, and has **placed preventable financial and operational strain** on our public and private colleges and universities."

"We urge the department to **redirect its efforts away from controversial political priorities**, many of which are entangled in lengthy litigation, and focus on effectively overhauling and implementing the modernized FAFSA as Congress envisioned and students deserve,"

August 21, 2024 Letter to US Secretary of Education Miguel Cardona from
Aimee Rogstad Guidera, Virginia Secretary of Education.

Twenty Senators Call on ED to Delay GE and FVT Reporting Deadline

By Maria Carrasco, NASFAA Staff Reporter

In light of continued issues with the rollout of the 2024-25 Free Application for Federal Student Aid (FAFSA), we write to you to request that the Department of Education (ED) **delay the institutional reporting deadline** for the new Gainful Employment (GE) and Financial Value Transparency (FVT) regulations to **July 2025**.

The Department **should not rush to meet** the October 1 deadline **at the expense of financial aid administrators** who are doing what they can to **guide students through a difficult FAFSA cycle**.

Now more than ever, **aid administrators need to remain focused on helping students** apply and receive the aid they need to access their postsecondary education.

United States Senate

Subcommittee on Higher Education and Workforce Development

"GAO Uncovers Biden-Harris FAFSA Failures"

This Committee refuses to sit idle while the Department mismanages the futures of millions of prospective students.

Thanks to Republicans on the front lines, who have made this a priority, the GAO has released preliminary findings from its investigation.

We will discuss those findings at length today, some of which are **horrific** and **inexplicable**.

Subcommittee Chairman Burgess Owens (R-UT)

Decline in FAFSA Submissions, Current Compared to Prior Application Cycle

	High school seniors and other first-time applicants		Returning applicants		Total applicants
Current application cycle	3,177,000	+	11,161,000	=	14,338,000
Change from prior year	↓ 325,000 -9%		↓ 106,000 -1%		↓ 432,000 -3%

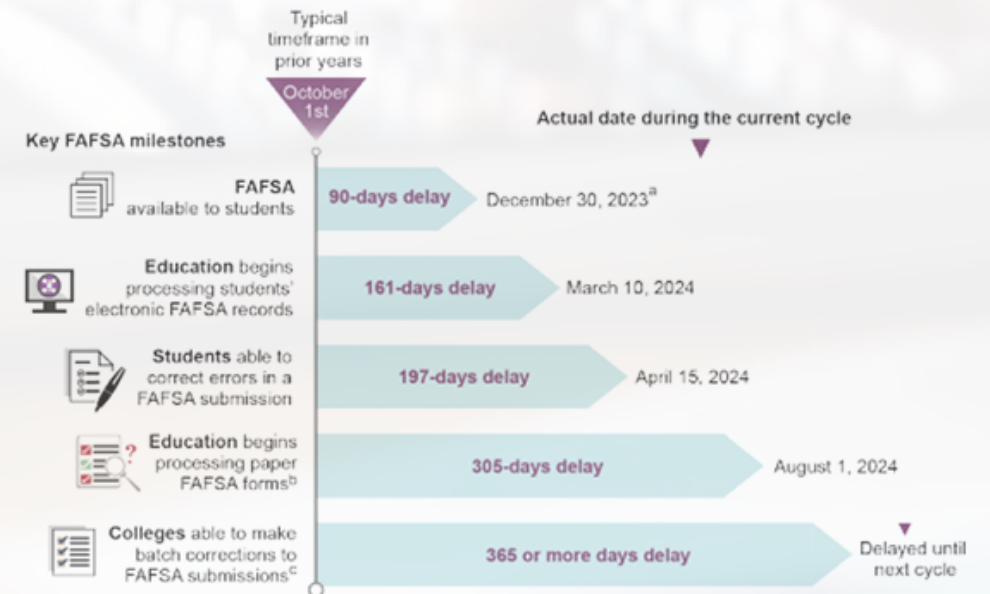
Source: GAO analysis of Department of Education data. | GAO-24-107407

Total Calls to Education's Call Center, First 5 Months of FAFSA Application Cycle, January-May 2024



Source: GAO analysis of Department of Education data. | GAO-24-107407

Figure 1: Delays in the Rollout of the Free Application for Federal Student Aid (FAFSA) Compared to Prior Years



Source: GAO analysis of Department of Education documents, GAO (icons). | GAO-24-107407

^aThe Department of Education had a "soft launch" of the FAFSA on December 30, 2023, but the application was not consistently available until January 7, 2024, according to Education.



The number of colleges eligible for Title IV financial aid dropped to **5,819** in the 2023-24 academic year, down **1.7%** from the year before.

That decline represents an overall loss of about **100** Title IV institutions.

The for-profit sector experienced some of the heaviest declines, the new data shows.

- There were **307** four-year for-profits in the 2023-24 academic year, a **4.1%** drop year over year.
- The number of two-year for-profit institutions declined **3.6%** year over year, falling to **508** colleges.
- **1,567** four-year private nonprofits are down **1.3%** (loss of 20 Title IV institutions.)
- Public four-years rose **1.7%** in 2023-24 year over year to total **817**.

Accreditation - Peer Review



State Government


Federal Government



Accreditation Peer-Review

Fostering Strong Relationships
With the Regulatory Triad

CONSUMER PROTECTION



BPPPE

ACADEMIC QUALITY





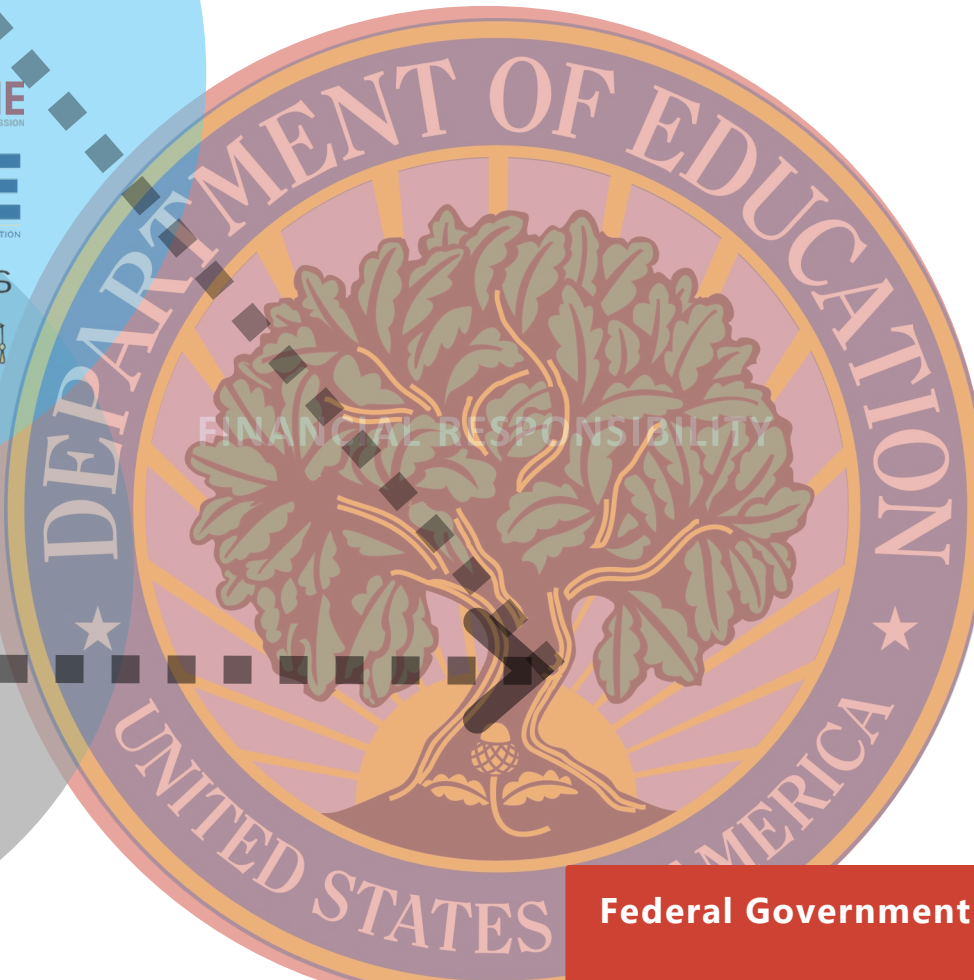








STUDENT EDUCATIONAL EXPERIENCE



State Government

Federal Government

BEST PRACTICES

FOR SUSTAINED
SUCCESS



engage.

- **Support Accreditation** - non-government, peer-review, meaningful self-evaluation.
- **Participate in State Advocacy / Legislative Initiatives**
- **Attend Industry Events, Conferences, Hearings, Webinars**
 - Support Professional Development of Your Staff
- **Share Your Experience and Knowledge**
 - Within Your Own Organization
 - Within Your Network
- **Don't Make it Worse** - Be part of the Solution.



be authentic.

- **Be Authentic with Your Engagements**

- Regulations vs. Relationships
- Talk is Cheap
 - Actions Resonate

- **Be Transparent and Open**

- No Surprises
- Fully Disclose
 - Don't Get Cute
 - Don't Make it Worse

- **Be proactive, rather than reactive.**

- Disclose Early, Disclose Often

- **Tell Your Story Through Your Students' Success**



be realistic.

If you *see* something, *do* something.
Because Your Regulator Will.

Student Achievement: Retention, Graduation, Licensure, Certification, Employment

Student Satisfaction: Student Feedback, What do you do with it?

Student Support: Academic, SAP, Career Services, Soft-Skills; Increasingly Mental Health

Financial Viability : Looming Specter of Closures & Teach-Outs

- 250,000+ student borrowers were affected by over 1,100 school closures from 2010-2020 (CECU).



be strategic.

Student Centered Viability

- Graduation Rate Trends
- Certification / Licensure Pass Rates
- Employment Rates

Ensuring Success Through Continuous Assessment and Planning

- Self-Evaluation
 - How are things going?
 - How can things improve?
 - What needs to change?
 - What can we build on?

What actions do you take based on feedback?

(Data, Student, Employer)



be decisive.

The Importance of Due Process & When to Take Decisive Action

Institution Initiated Action: Take Control

- Program Viability
- Supporting Growth
- Financial Stability

Expect Definitive Actions – Earlier in the Process

- Increasing pressure on regulators to act sooner, more decisively.
- Expect increasing rigor. Expect. MORE.
- Due Process



be known...

for the right reasons

- Reputation is **Everything**
 - Are you a Flagship School?
- “Don’t Make Your Problems, My Problems”
- Student/Community Facing Communications



Celebrate Success.

- Remember Why You Do What You Do
- Celebrate Everyday Successes
- Support One Another
- Student Centric in All Things
 - An Opportunity to Showcase Your Institution
- Embrace the Opportunity to Improve



Q and A

BCC






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COLLABORATIVE COMPLIANCE

Fostering Strong Relationships with the Regulatory Triad

CAPPS
40TH ANNUAL CONFERENCE

Light THE Fire

October 2 - 4, 2024

