Higher Learning Commission

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January 26, 2026

David R. Barker
Assistant Secretary
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: **Docket ID: ED-2025-OPE-1009**

Dear Mr. Barker:

The Higher Learning Commission (HLC) appreciates the opportunity to comment on possible updates to the 2022 version of the Accreditation Handbook ("the Handbook") in response to the Request for Information (RFI) set forth by the U.S. Department of Education (ED) on December 11, 2025.

HLC is the largest institutional accreditor in the United States, accrediting approximately 950 member institutions, with a geographic footprint spanning nearly the entire United States. HLC has also been recognized by ED since the inception of the recognition process. Today, HLC's membership consists of every type of institution of higher education, from large public universities to community colleges to small, rural private institutions. Millions of students rely on HLC's quality assurance.

One of the questions in the RFI is whether "the Handbook is serving its intended purposes." The Handbook states that it has a dual purpose "to provide clarity to the public regarding existing requirements under the law and regulations, as well as additional clarity on guidance to accrediting agencies on the documentation for submission of a petition from an agency seeking recognition...."

Overall, it has been HLC's experience that the Handbook, as currently constructed, effectively serves its intended purposes, particularly in terms of providing guidance to accreditors as to the recognition process. The Handbook provides a clear and helpful roadmap to accreditors as they proceed through the recognition process, as it lists in a detailed and comprehensive fashion the items of information that are required in both the petition and File Review stages of the recognition process. HLC leveraged the valuable information contained in the Handbook as it proceeded through its most recent submission of a petition for continued recognition. The Handbook was a critical resource that enabled HLC staff to clearly identify the types and items of information that needed to be included with its submissions.

At the same time, the technical nature of the Handbook suggests that the audience that engages most frequently with the Handbook is accreditors participating in the recognition process. Institutions of higher education and the public are not the target audience for the Handbook and do not typically engage with the Handbook. As such, HLC encourages ED to continue to focus the

Handbook on its primary purpose of providing essential guidance and instructions to accreditors that are recognized by, or are seeking to be recognized by, ED. Attempting to use the Handbook more broadly for other purposes would likely create confusion and otherwise lessen the efficacy of the Handbook overall.

The RFI also seeks feedback as to whether there are any particular "pain points" in the Handbook about which ED should be aware. Currently, the Handbook often uses the approach of requesting a detailed example (generally referred to as a "case study" by accreditors) by which an accreditor can demonstrate its compliance with a particular standard. See, for example, pages 13–14 regarding compliance with 34 CFR §602.16(a)(1). This approach of using examples and case studies, rather than requiring an exhaustive collection of information regarding compliance with a specific regulation, is an efficient and effective way to assess accreditor compliance in the given areas. It is also reasonable that ED specifies particular institutions or characteristics that an accreditor must use for such an example or case study.

Where possible, HLC would encourage ED to further utilize this approach of using examples or case studies with respect to other regulatory requirements. This could include, for example, combining required information across applicable regulations so that an accreditor can provide a true case study to demonstrate an evaluation process from start to finish, rather than treating each regulation in isolation. This would then allow an accreditor to utilize a case study, even if the institution for that case study is selected by ED, to demonstrate its compliance with multiple regulations in tandem.

Finally, the RFI asks whether there are ways in which the Handbook could "be designed to be less burdensome." As a structural matter, HLC would encourage ED to attempt to align the ways in which the regulations are "grouped" together across the various recognition processes and platforms: the Handbook, the focused review criteria (as currently articulated in the "Criteria to Be Addressed by All Agencies Applying for Renewal of Recognition Beginning with Petitions Due After July 1, 2025 Until Such Time as New Statutory and/or Regulatory Requirements are in Effect" document promulgated by ED), and the Office of Postsecondary Education e-recognition portal. For example, the e-recognition portal groups together §602.22(a)(1)(ii)(A–F) into a single response, while other subsections of this regulation are grouped differently. However, this type of grouping is not present in either the Handbook or the focused review criteria. Because of the differences in how the regulations are currently presented across documents, accreditors must first access the e-recognition portal to determine how responses to the applicable regulations are to be entered and then compare the structure of the e-recognition portal to the Handbook and focused review criteria to ensure that the proper information is being provided.

Aligning these "groupings" across the various recognition tools would significantly reduce the time and effort that an accreditor must spend aligning its submission materials to three different structures, without altering the quality of the information submitted. HLC will also note that the e-recognition portal itself is intuitive, easy to use, and represents a significant improvement from the previous system.

Thank you for considering these comments. We share your interest in making higher education work better for students, assuring the academic quality of institutions in which students invest their time and resources, and supporting institutions in pursuing their educational missions. As such, we

appreciate your desire to improve efficiencies and reduce undue burden in the accreditation system.

I am always available to answer any questions or clarify any comments.

Sincerely,

Barbara Gellman-Danley
President

Cc: Elizabeth Daggett, Director, Accreditation Group, Office of Postsecondary Education, U.S. Department of Education