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ACCREDITING COMMISSION FOR
COMMUNITY AND JUNIOR COLLEGES

Dear Colleagues,

I write to provide an update on the U.S. Department of Education's ongoing Negotiated Rulemaking discussions related to accreditation and institutional oversight, formally convened under the Accreditation, Innovation, and Modernization (AIM) Committee. The second week of rulemaking began on Monday, May 18, and the Department issued revised regulatory language for consideration at the outset of this week's negotiations.

This week, the committee's discussions have focused heavily on three major themes: transfer of credit, academic freedom, and the composition and operation of accrediting commissions and peer review systems.

One of the clearest areas of emerging consensus among negotiators involves revised federal requirements regarding institutional transfer-of-credit policies. The Department's proposed revisions would significantly expand institutional disclosure obligations and formalize expectations around transfer transparency and prior learning assessment.

Among the most significant proposed changes under discussion are requirements that institutions:

- Publicly disclose detailed transfer-of-credit criteria and policies as part of consumer information obligations;
- Clearly identify any categories of institutions or sources from which transfer credit will not be accepted;
- Publish lists of institutions with which formal articulation agreements exist;
- Provide written criteria for evaluating prior learning, including military service, employment-based learning, and demonstrated competencies;
- Expand disclosures to prospective students before enrollment, registration, or any financial commitment is made; and
- Strengthen disclosures regarding whether academic programs meet state licensure or certification requirements in the state where a student is located.

Committee members have also engaged in substantial discussion regarding academic freedom protections, the future role of peer review in accreditation, and whether accrediting commissions should be required to include additional categories of representation or expertise among commissioners and evaluation teams. While conversations remain ongoing, negotiators repeatedly emphasized the importance of preserving peer review as a cornerstone of accreditation quality assurance, while also balancing public accountability and transparency expectations.

At this stage, no final consensus has been reached across all topics under negotiation. As is typical in negotiated rulemaking, the Department may continue revising language throughout the week in response to committee feedback and stakeholder concerns.

ACCJC staff continue to monitor the negotiations closely, assess potential implications for member

institutions, and engage with national partners regarding operational and policy impacts. We anticipate several of the proposed provisions, particularly those related to transfer-of-credit, could have meaningful implementation implications for institutions. As a reminder, ACCJC has a Negotiated Rulemaking FAQ webpage available at: <https://accjc.org/negreg2026-aim-faq/>.

We will continue to keep member institutions informed as negotiations progress and as additional regulatory language becomes available.

Sincerely,

Mac

A handwritten signature in dark ink, consisting of a stylized 'M' followed by a long horizontal stroke.

Mac Powell, MBA, PhD

President

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