The accreditation process and its relevance in higher education is a complicated topic for most, even for Regental system employees who regularly work with accreditation agencies. Recent discussions between Regents and staff at Board of Regents meetings as well as comments received during the new Board member orientation process indicate a need for greater education on accreditation. The following analysis serves as a reference document for Regents when issues of accreditation arise. The analysis includes explanation of the differences between specialized/program accreditation and institutional accreditation. In addition, the analysis examines the background, processes, and benefits of institutional accreditation. Special attention is given to the role of the Higher Learning Commission (the regional institutional accrediting agency for Regental institutions), including the accreditor’s expectations of the Board.

I. Types of Accreditation
Accreditation is typically divided into two distinct types, specialized/program accreditation and institutional accreditation, each serving different functions.

A. Specialized/Program Accreditation: This form of accreditation reviews and certifies the standards and practices within specific programs, departments, or schools that are part of a college or university. Individual accrediting bodies maintain their own set of standards to ensure academic quality and accountability within their respective disciplines. Specialized/program accreditation is not available for all fields or disciplines.

Specialized/program accreditation involves a process of internal and external review to ensure programs, curriculum, faculty, student services and facilities meet the accreditor’s standards of excellence. Public recognition obtained through the accreditation process provides important information for employers, students, and in some cases, occupational licensing agencies that require a degree from an accredited program. Program accreditors may have requirements related to faculty qualification, teaching loads, equipment, and other variables that drive both program quality and cost; thus two programs in the same field but offered at different South Dakota state institutions may have differing operational costs and associated student fees.
The Board of Regents supports specialized/program accreditation in the 2014-2020 Strategic Plan under Goal 2: Academic Quality and Performance through the following statements:

- Support and promote institutional and, where appropriate, programmatic accreditation.
- Encourage institutions to increase the number of academic programs (or specific colleges or schools within the institutions) that hold programmatic accreditation.
- Approve special fees when necessary to provide resources needed for accreditation.

In addition, The Board of Regents requires institutions to gain Board permission prior to seeking specialized/program accreditation.\(^2\)

Currently, Regental System institutions hold over ninety specialized or program accreditations from organizations recognized by the Council on Higher Education Accreditation (CHEA), Association of Specialized and Professional Accreditors (ASPA), and/or the United States Department of Education (USDOE). Examples include but are not limited to:

- Council for Accreditation of Educator Preparation (BHSU, DSU, NSU, SDSU, USD)
- Association to Advance Collegiate Schools of Business (BHSU, USD)
- National Association of Schools of Art and Design (NSU, USD)
- Accreditation Board for Engineering and Technology (SDSMT, SDSU)
- Commission on Accreditation for Health Informatics and Information Management Education (DSU)
- National Accrediting Agency for Clinical Laboratory Sciences (SDSU)

**B. Institutional Accreditation:** Institutional accreditation reviews and certifies the standards and practices of entire institutions. Institutional accreditation involves a process of internal and external review to ensure programs, curriculum, assessment, faculty, student services, and facilities meet the accreditor’s standards of excellence. There are two separate categories of institutional accreditation, national and regional accreditation.

1. **National accreditation** organizations review and certify the standards and practices of entire institutions regardless of their geographic location. National accreditation typically occurs for for-profit or specialized institutions, such as those focusing on career and technical or religious education. Examples of national accreditation agencies recognized by the US Department of Education include but are not limited to:

- Council on Occupational Education Scope of recognition: the accreditation and pre-accreditation (“Candidacy Status”) throughout the United States of postsecondary occupational education institutions offering non-degree and applied associate degree

---

\(^1\) South Dakota Board of Regents, Agenda Item 16 (8-9 October 2014), available from https://www.sdbor.edu/the-board/agendaiems/Documents/2014/October/16_BOR1014.pdf.

programs in specific career and technical education fields, including institutions that offer programs via distance education.  

- **Transnational Association of Christian Colleges and Schools, Accreditation Commission** Scope of recognition: the accreditation and pre-accreditation (“Candidate” status) of Christian postsecondary institutions in the United States that offer certificates, diplomas, and associate, baccalaureate, and graduate degrees, including institutions that offer distance education.

South Dakota Regental institutions do not typically seek nor receive national accreditation.

2. **Regional accreditation** organizations review and certify standard and practices of entire institutions within a specific geographic region. Regional accreditation has a longer established history than national accreditation and is the commonly accepted practice among most associate, bachelor’s, and graduate degree granting institutions. South Dakota Regental institutions participate in regional accreditation through the Higher Learning Commission (see Section IV), as do the state’s technical institutes, private universities and colleges, and tribal colleges. Examples of regional accreditation agencies recognized by the US Department of Education include but are not limited to:

- **Middle States Commission on Higher Education** Scope of recognition: the accreditation and pre-accreditation (“Candidate Status”) of institutions of higher education in Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands, including distance and correspondence education programs offered at those institutions.

- **Southern Association of Colleges and Schools, Commission on Colleges** Scope of recognition: the accreditation and pre-accreditation (“Candidate for Accreditation”) of degree-granting institutions of higher education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia, including the accreditation of programs offered via distance and correspondence education within these institutions.

II. **Historical Context of Regional Institutional Accreditation**

Colleges and universities introduced many new fields of study in the late nineteenth century, causing questions to emerge relating to common standards and quality control. A number of accrediting bodies emerged to address these questions. Institutions voluntarily joined regional associations that established quality standards. By 1923, versions of the six commonly accepted regional accrediting bodies existed. The criteria for membership in these organizations eventually

---

became the criteria for formal accreditation. The standards included measures of student achievement, quality assurance, and institutional operations. Association with a regional accrediting organization lost its voluntary status as federal agencies tied funding initiatives to accreditation status. For example, in 1952 the GI Bill required regional accreditation for eligibility to receive federal student aid funds. The 1965 Higher Education Act strengthened the relationship between federal funding and regional accreditation.\(^7\)

Today, six regional accreditors exist. The US Department of Education and the Council on Higher Education Accreditation recognize the authority of these regional accreditors. The six accreditors are the Higher Learning Commission (HLC), Northwest Commission on Colleges & Universities, Western Association of Schools & Colleges, Southern Association of Colleges & Schools, Middle States Commission on Higher Education, and New England Association of Schools & Colleges. Membership is dependent upon the state in which the institution is located as indicated by the map below.

**Regional Accreditation Agencies**

<table>
<thead>
<tr>
<th>Color</th>
<th>Accreditation Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>Higher Learning Commission (HLC)</td>
</tr>
<tr>
<td>Red</td>
<td>Northwest Commission on Colleges &amp; Universities</td>
</tr>
<tr>
<td>Black</td>
<td>Western Association of Schools &amp; Colleges</td>
</tr>
<tr>
<td>Orange</td>
<td>Southern Association of Colleges &amp; Schools</td>
</tr>
<tr>
<td>Blue</td>
<td>Middle States Commission on Higher Education</td>
</tr>
<tr>
<td>Gray</td>
<td>New England Association of Schools &amp; Colleges</td>
</tr>
</tbody>
</table>

### III. Purpose of Regional Institutional Accreditation

The purpose of institutional accreditation is to ensure higher education institutions meet acceptable levels of quality and engage in continuous improvement. Non-governmental entities provide regional accreditation through the adoption and enforcement of quality standards. Member institutions determine the standards for each regional accrediting body. Enforcement of the standards also comes from these peer institutions through the accrediting body as peer review is a key component of the accreditation process. The institutional accreditation process differs from accountability efforts in other industries because the peer review process means institutions essentially police themselves and each other. According to the Council of Regional Accrediting Commissions:

> It is an unusual set-up as accountability systems go, but it has worked for more than 100 years because it relies on the rigorous process of peer review, not governmental monitoring, to define and evaluate whether institutions meet high standards. Self-

regulation preserves the autonomy and diversity of higher education, two unique characteristics of our higher education system that contribute to its high quality.\footnote{Council of Regional Accrediting Commissions, “What is Accreditation?” available from \url{https://www.c-rac.org/copy-of-about-accreditation}.}


- The accreditor establishes minimum standards and practices in collaboration with member institutions. Standards typically relate to institutional mission and strategic planning, student achievement levels, quality of educational practices, and financial stability.
- Individual institutions perform assurance reviews evaluating their performance against the standards.
- Peer review teams from the accreditor perform independent on-site evaluations and review the institution’s documentation and evidence in support of accreditation criteria.
- The accreditor issues and publishes results of the evaluation, indicating whether the institution meets accreditation standards or if there are deficiencies to address.
- The accreditor monitors the institution to determine if the institution maintains accreditation.
- The accreditor periodically re-evaluates the institution to determine whether to continue accreditation status.

The Board of Regents supports institutional accreditation in the 2014-2020 \textit{Strategic Plan} under Goal 2: Academic Quality and Performance by the following statement:\footnote{South Dakota Board of Regents, Agenda Item 16 (8-9 October 2014), available from \url{https://www.sdbor.edu/the-board/agendaitems/Documents/2014/October/16_BOR1014.pdf}.}

- Encourage institutions to exceed the criteria for institutional accreditation established by the Higher Learning Commission.

\section*{IV. South Dakota’s Regional Accradiator: The Higher Learning Commission (HLC)}

The Higher Learning Commission (HLC) began in 1895. Today, HLC provides institutional accreditation to post-secondary institutions in the following nineteen states: Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming. HLC maintains a Board of Trustees elected by the membership; one South Dakotan, Spearfish Mayor Dana Boke, currently serves as a trustee. HLC employs a full-time staff with offices located in Chicago.\footnote{The Higher Learning Commission, “About the Higher Learning Commission,” available from \url{https://www.hlcommission.org/About-HLC/about-hlc.html}.}

HLC is the regional accreditor for South Dakota Regental institutions, as well as other colleges, universities, and technical institutes in the state. The following institutions located in South Dakota have current HLC accreditation:

\footnotesize

\begin{enumerate}
\item \url{https://www.c-rac.org/copy-of-about-accreditation}.
\item \url{https://www2.ed.gov/admins/finaid/accred/accreditation.html}.
\item \url{https://www.sdbor.edu/the-board/agendaitems/Documents/2014/October/16_BOR1014.pdf}.
\item \url{https://www.hlcommission.org/About-HLC/about-hlc.html}.
\end{enumerate}
The current accreditation status and history of HLC actions related to individual institutions is accessible through the following portal: https://www.hlcommission.org/Directory-of-HLC-Institutions.html. The portal’s information on the reaffirmation of accreditation status for Regental institutions is below.

<table>
<thead>
<tr>
<th>Institution</th>
<th>Initial Accreditation</th>
<th>Most Recent Affirmation of Accreditation</th>
<th>Next Reaffirmation of Accreditation</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHSU</td>
<td>01/01/1928</td>
<td>2012 - 2013</td>
<td>2022 - 2023</td>
</tr>
<tr>
<td>DSU</td>
<td>01/01/1920</td>
<td>2011 - 2012</td>
<td>2018 - 2019</td>
</tr>
<tr>
<td>NSU</td>
<td>01/01/1918</td>
<td>2016 - 2017</td>
<td>2026 - 2027</td>
</tr>
<tr>
<td>SDSMT</td>
<td>01/01/1925</td>
<td>2014 - 2015</td>
<td>2022 - 2023</td>
</tr>
<tr>
<td>SDSU</td>
<td>01/01/1916</td>
<td>2009 - 2010</td>
<td>2019 - 2020</td>
</tr>
<tr>
<td>USD</td>
<td>01/01/1913</td>
<td>2011 - 2012</td>
<td>2020 - 2021</td>
</tr>
</tbody>
</table>

Once an institution has received HLC accreditation, the institution must participate in ongoing activities affirming compliance with HLC standards. For example, institutions must notify HLC of significant changes occurring at the institution, including but not limited to the addition of branch campuses, contractual agreements related to educational programs, agreements with other institutions, and teach-out arrangements for eliminated academic programs. In addition, HLC provides different options for institutions to reaffirm accreditation on a ten-year cycle, each requiring various actions that must occur within the accreditation cycle. These two options, or pathways, have different reporting and evaluation requirements (HLC is currently phasing out a third pathway). These include:
### STANDARD PATHWAY OVERVIEW\(^{12}\)

<table>
<thead>
<tr>
<th>Cycle</th>
<th>Emphasis</th>
<th>Evaluation Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-year</td>
<td>Quality assurance and institutional improvement</td>
<td>● Annual Institutional Updates</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Year 4: Comprehensive Evaluation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Year 10: Comprehensive Evaluation</td>
</tr>
</tbody>
</table>

### OPEN PATHWAY OVERVIEW\(^{13}\)

<table>
<thead>
<tr>
<th>Cycle</th>
<th>Emphasis</th>
<th>Evaluation Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-year</td>
<td>Quality assurance and institutional improvement, plus an institutional-specific Quality Initiative.</td>
<td>● Annual Institutional Updates</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Year 4: Assurance Review</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Years 5-9: Quality Initiative</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Year 10: Comprehensive Evaluation</td>
</tr>
</tbody>
</table>

#### V. Benefits of Regional Institutional Accreditation

Regional institutional accreditation has several important benefits. First, the process used by the accreditors helps demonstrate improvement at colleges and universities in all phases of their operations. Second, the US Department of Education formally recognizes regional accreditors such as the HLC, a recognition that qualifies students at accredited institutions to access federal financial aid programs. Third, accreditation is a valuable tool for job seekers. Employers frequently verify that an applicant’s degree comes from an accredited college or university rather than a degree mill. In addition, many employers often require employees to attend accredited institutions in order to receive tuition and fee payments for employer sponsored education benefit programs. Fourth, regional accreditation is integral in assisting students who want accumulated credits to transfer to another institution. Most institutions accept such transfer credits from other institutions when earned at regionally accredited institutions, or at minimum, accept such credits more readily than those accumulated at non-accredited institutions. An example of this is the current Board of Regents Policy 2:5 preferences for transfer credits from accredited institutions.

#### VI. Board of Regents Responsibilities for HLC Accreditation

HLC identifies three overarching areas in which an institution’s “governing board” has responsibilities (the Board of Regents is the governing board for all six public universities in South Dakota). These areas include HLC’s “Guiding Values” (the values that support the Criteria for Accreditation), “Assumed Practices” (foundational practices shared by institutions of higher education regardless of mission), and “Criteria for Accreditation” (the quality standards used to determine accreditation or reaffirmation of accreditation). This section provides a brief summary of direct references to the governing board found in HLC Guiding Values, Assumed Practices, and Criteria for Accreditation as well as examples of HLC recommended documentation for compliance. Note that HLC implies additional Board responsibilities – this section only addresses direct references to the governing board.

---


A. Guiding Values

- HLC expects the governing board to ensure quality through its governance structures, with appropriate degrees of involvement and delegation.\(^\text{14}\)

- The well-being of an institution requires that its governing board place that well-being above the interests of its own members and the interests of any other entity. Because HLC accredits the educational institution itself, and not the state system, religious organization, corporation, medical center or other entity that may own it, it holds the governing board of an institution accountable for the key aspects of the institution’s operations. The governing board must have the independent authority for such accountability and must also hold itself independent of undue influence from individuals, be they donors, elected officials, supporters of athletics, shareholders, or others with personal or political interests.\(^\text{15}\)

B. Assumed Practices

- The institution has a conflict of interest policy that ensures that the governing board and the senior administrative personnel act in the best interest of the institution.\(^\text{16}\)

- The governing board and its executive committee, if it has one, include some “public” members. Public members have no significant administrative position or any ownership interest in any of the following: the institution itself; a company that does substantial business with the institution; a company or organization with which the institution has a substantial partnership; a parent, ultimate parent, affiliate, or subsidiary corporation; an investment group or firm substantially involved with one of the above organizations. All publicly-elected members or members appointed by publicly-elected individuals or bodies (governors, elected legislative bodies) are public members.\(^\text{17}\)

- The governing board has the authority to approve the annual budget and to engage and dismiss the chief executive officer.\(^\text{18}\)

C. Criteria for Accreditation, Criterion 1: Mission

- The mission statement is developed through a process suited to the nature and culture of the institution and is adopted by the governing board.\(^\text{19}\)

---


HLC Evidence Examples: Evidence the mission statement is regularly reviewed by the administration and reviewed and approved by the governing board; Information about new student, employee, and board member orientation that imparts the mission.\textsuperscript{20}

D. Criteria for Accreditation, Criterion 2: Ethical and Responsible Conduct

- The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.\textsuperscript{21}

HLC Evidence Examples: External (independent) and internal audits since last comprehensive evaluation; Schedule of and minutes for Board audit and/or finance committee meetings; Documentation supporting ongoing training related to integrity issues and ethical behavior for all employees and board members (e.g., sexual harassment, sexual assault, campus safety, etc.); Annual conflict of interest affirmation forms signed by board and senior leadership; Grievance policy for faculty, staff and students if not delineated in faculty, staff and student handbooks.\textsuperscript{22}

- The governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.\textsuperscript{23}

- The governing board's deliberations reflect priorities to preserve and enhance the institution.\textsuperscript{24}

- The governing board reviews and considers the reasonable and relevant interests of the institution’s internal and external constituencies during its decision-making deliberations.\textsuperscript{25}

- The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests, or other external parties when such influence would not be in the best interest of the institution.\textsuperscript{26}

- The governing board delegates day-to-day management of the institution to the administration and expects the faculty to oversee academic matters.\textsuperscript{27}


\textsuperscript{27} Higher Learning Commission, “Criterion 2. Integrity: Ethical and Responsible Conduct,” available from
HLC Evidence Examples: Dates, agendas and minutes of board meetings for multiple years (and town hall or community meetings with the board); On-boarding and orientation process for new board members; Information about professional development and training for board members; Board approval of planning and budgeting documents; Board selection, evaluation, and right to terminate president of institution; Board self-evaluation.28

E. Criteria for Accreditation, Criterion 5: Resources, Planning, and Institutional Effectiveness

- The governing board is knowledgeable about the institution; it provides oversight of the institution’s financial and academic policies and practices and meets its legal and fiduciary responsibilities.29

- The institution has and employs policies and procedures to engage its internal constituencies—including its governing board, administration, faculty, staff, and students—in the institution’s governance.30

HLC Evidence Examples: Bylaws, policies, procedures and schedules for the institution’s faculty or university senate, student government association, staff senate or council, and governing board; Agendas and minutes of governing board demonstrating knowledge and oversight of finances and academic functions.31


