



Accreditation Without a Compass

What Dismantling the Federal Department of Education
Means for Higher Education, Accreditation,
and the Students States Serve

The Signal Report

A Briefing for Legislators, Higher Education Advocates, and Concerned Citizens

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The Herron Group, LLC | theherrongroupllc.net

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Introduction

Three major responsibilities of the federal Department of Education are to oversee federal student aid programs, to oversee the accreditation of higher education institutions, and to enforce civil rights protections for students and educators across the United States (U.S. Department of Education, 2025). One of the goals of Project 2025 is to reassign oversight of federal funding that supports these functions to other federal agencies and to shift responsibilities for civil rights protections and accreditation to each state (Burke, 2023).

In this brief, readers will find what is at stake if these changes move forward: what accreditation is and why it matters, which institutions face the greatest risk, what Oklahoma would need to build to fill the gap, and what legislators and advocates should be considering now.

What Project 2025 Proposes for Higher Education

Project 2025, formally titled *Mandate for Leadership: The Conservative Promise*, is a 922-page policy blueprint produced by the Heritage Foundation and approximately 100 other conservative organizations. The chapter on the Department of Education, authored by Lindsey Burke, opens with a direct call to eliminate the department entirely (Burke, 2023).

Its proposals for higher education include dismantling the federal Department of Education and redistributing its functions to other agencies or to states with little structural guidance. It calls for overhauling the accreditation system, potentially allowing states to recognize their own accrediting bodies for Title IV federal aid eligibility. It proposes prohibiting accreditation agencies from requiring institutions to adopt diversity, equity, and inclusion policies. It would move the Office for Civil Rights from the Department of Education to the Department of Justice, restricting enforcement to litigation only. And it calls for privatizing the federal student loan program, eliminating income-based repayment plans, and ending the Public Service Loan Forgiveness program (Burke, 2023; Flannery, 2024; Knott, 2024).

These are not aspirational talking points. They represent a detailed policy roadmap. As of early 2026, the administration's education agenda has begun to mirror this blueprint in observable ways, including proposed restructuring of the Office for Civil Rights, funding freezes affecting minority-serving institutions, and the launch of negotiated rulemaking to overhaul accreditation (Knott, 2024; U.S. Department of Education, 2026).

Why Accreditation Matters

Accreditation is the quality assurance process by which colleges, universities, trade schools, and vocational programs are evaluated against established educational standards. It determines whether an institution is eligible to receive federal Title IV funding, which includes Pell Grants and federal student loans. Without accreditation, students cannot access federal financial aid. Without access to federal financial aid, most institutions cannot survive (U.S. Department of Education, 2025).

Currently, this system is administered by independent, nonpartisan regional and national accrediting bodies recognized by the U.S. Department of Education. These accreditors evaluate faculty qualifications, academic programs, governance structures, student outcomes, financial

stability, and institutional integrity. Their independence from political influence has been deliberate and essential to their function.

Under Project 2025, states could be empowered to recognize their own accreditors for Title IV purposes. If accreditation shifts from a quality standard to a political instrument, governors and state legislatures gain a powerful mechanism to reward institutions that align with their priorities and pressure those that do not (Burke, 2023; Flannery, 2024; Knott, 2024).

Institutions at Particular Risk

Historically Black Colleges and Universities

HBCUs represent approximately 3 percent of all colleges and universities in the United States but enroll roughly 10 percent of all Black college students and produce nearly 20 percent of all Black college graduates (The White House, 2024). They generate \$16.5 billion per year in economic impact and support more than 136,000 jobs nationally (UNCF, 2024). They have produced 40 percent of all Black engineers, 50 percent of all Black teachers, and 70 percent of all Black doctors and dentists (The White House, 2024).

According to the UNCF Frederick D. Patterson Research Institute (2019) accreditation has already been a disproportionate burden on HBCUs. The report reveals that while HBCUs represented roughly 10 percent of SACSCOC membership, they received more than 30 percent of all sanctions in 2017 and 2018. Over a 30-year period, 43 percent of all institutions dropped from SACSCOC membership were HBCUs, while HBCUs represented only 9 percent of members (Adedoyin, 2022). Financial instability driven by chronic underfunding is the leading cause. If state-controlled accreditation systems are politicized or underfunded, HBCUs face compounding risk on an already fragile foundation.

Tribal Colleges and Universities

There are currently 37 Tribal Colleges and Universities operating across more than 80 sites in 29 states (AIHEC, 2025). They serve Native American students, preserve Indigenous languages and cultural traditions, and build economic capacity in tribal communities. They lack large endowments and depend heavily on the stability of federal funding.

If accreditation authority is shifted to states without clear structures to recognize and evaluate the unique mission of tribal colleges, these institutions risk losing the federal aid eligibility that keeps them operational. For many rural tribal communities, the tribal college is the only accessible postsecondary institution within reach. Any state governance structure must be developed in partnership with, not on behalf of, tribal nations.

Trade, Vocational, and Career Technology Schools

Oklahoma serves more than 550,000 students through its career and technology education system across 58 technology centers. The Oklahoma State Board of Career and Technology Education is federally recognized as the accrediting body for public postsecondary vocational education in the state (Oklahoma CareerTech, 2026).

If the federal recognition underpinning that authority is disrupted or restructured without clear replacement guidance, the credential value of vocational and trade programs becomes uncertain. Students who complete a welding, nursing assistant, or HVAC program in Oklahoma

need that credential to be recognized by employers and, if they relocate, by other states. A fragmented accreditation landscape threatens that portability.

Students Who Move Between States

One of the least-discussed consequences of devolving accreditation entirely to states is the impact on students who transfer or relocate. The current system provides a consistent national framework. A degree from an accredited institution in Oklahoma carries predictable meaning to an employer in Texas, Virginia, or Washington.

If each state develops its own accreditation standards in isolation, without interstate coordination, that consistency disappears. Students who begin a degree program in one state and transfer to another may find their credits do not transfer. Employers may not recognize credentials from institutions whose accreditation was issued by a politically appointed body with no connection to nationally recognized standards. For working adults, military families, and anyone who moves across state lines, this creates substantial and practical barriers.

Oklahoma's Specific Exposure

Oklahoma is one of the nation's most federally dependent states. In 2024, the state received approximately \$14.3 billion in federal grants supporting programs and services ranging from child care to transportation to higher education. Oklahomans receive far more in federal support than they pay in federal taxes (Hamby, 2025).

The Oklahoma State Regents for Higher Education oversee a system of public colleges and universities with a current base appropriation of approximately \$1.03 billion per fiscal year, with an FY 2027 budget request totaling more than \$1.4 billion to address documented needs in deferred maintenance, workforce development, and research infrastructure (Oklahoma State Regents for Higher Education, 2024a; 2024b).

Only 10 percent of Oklahoma's Class of 2024 high school graduates met all four ACT college readiness benchmarks, compared to 20 percent nationally. Oklahoma's average composite ACT score of 17.6 ranked second-to-last among all states (KGOU, 2024). The educational challenge facing the state is significant before any changes to federal structure are considered.

State appropriations as a share of higher education funding have declined sharply over time. The system is already stretched. Asking Oklahoma to absorb the cost and administrative complexity of building an independent accreditation infrastructure, without federal scaffolding, direction, or funding, would require resources the state does not currently have a path to generate.

What a State-Level System Would Require

If the federal government eliminates its role in recognizing and overseeing accreditors, states that wish to protect the integrity of their higher education credentials and maintain Title IV eligibility for their students will need to build or significantly expand their own governance infrastructure. This would involve:

Establishing a legally constituted state accreditation authority with the scope to evaluate four-year universities, two-year community colleges, vocational and career technology programs, tribal colleges, and private institutions including HBCUs. Developing written accreditation

standards across academic quality, governance, financial stability, student outcomes, and institutional integrity that meet any remaining federal benchmarks and are defensible to out-of-state employers and institutions.

Building a professional staff with expertise in higher education evaluation, institutional finance, academic program review, and legal compliance. National accrediting bodies employ dozens to hundreds of specialists. Replicating this capacity at the state level requires recruiting, training, and retaining talent that does not currently exist in most state education agencies.

Funding site visits, institutional reviews, and ongoing monitoring on a defined cycle. Establishing appeals processes, due process protections, and a legal framework for adverse accreditation actions. Addressing the accreditation needs of tribal colleges in a manner that respects tribal sovereignty. And coordinating with other states to pursue interstate recognition agreements so that Oklahoma credentials retain their portability.

None of these elements are optional if the goal is a functional, credible accreditation system. All of them cost money and take time to build. The federal government spent decades developing the current infrastructure. States would be asked to replicate it on compressed timelines with no clear guidance and no dedicated transition funding.

What Is Lost When Civil Rights Enforcement Moves

Project 2025 proposes moving the Office for Civil Rights from the Department of Education to the Department of Justice and limiting enforcement to litigation only (Burke, 2023; US Department of Education, 2025). The Office for Civil Rights currently enforces federal civil rights law on college and K-12 campuses by investigating complaints of discrimination based on race, sex, disability, and national origin. Its primary enforcement mechanism is investigation and mediation, which allows institutions to correct problems without litigation and allows students to obtain remedies without the cost and burden of a lawsuit.

Restricting enforcement to litigation only removes that tool. A student who experiences sexual harassment, disability discrimination, or racial bias at a college or university would no longer have access to a federal investigative process designed specifically for the educational context. They would instead need to pursue litigation, a process that is expensive, slow, and inaccessible to most students, especially first-generation students and those from low-income backgrounds.

Oklahoma does not currently have a state-level agency with the staffing, legal framework, or educational specialization to absorb the functions of the federal Office for Civil Rights. Building that capacity would require legislative action, appropriations, and years of institutional development.

Recommendations for Legislators and Advocates

Regardless of one's position on the appropriate federal role in education, the practical question before state lawmakers is this: if the federal structure changes, what will Oklahoma do to protect the quality, integrity, and accessibility of its higher education system? The following actions merit serious attention now, before changes are imposed rather than chosen.

Conduct a formal assessment of Oklahoma's current exposure. Identify every institution in the state that relies on federal Title IV funds, what percentage of each institution's revenue that

represents, and what accreditation body currently provides their recognition. This baseline is essential for any planning.

Engage the Oklahoma State Regents for Higher Education in a coordinated review of what additional statutory authority, staffing, and funding would be required to administer an independent state accreditation framework.

Open government-to-government consultation with Oklahoma's tribal nations regarding the accreditation status and specific needs of tribal colleges and universities. Any state governance structure must be developed in partnership with tribal nations, not imposed upon them.

Join or initiate an interstate compact to develop shared accreditation standards and reciprocal recognition agreements among neighboring states. Coordination reduces the cost burden on any single state and preserves credential portability for students.

Advocate at the federal level for a clear transition plan. If federal accreditation authority is to be changed, states need specific statutory direction, a defined timeline, and federal transition funding.

Protect civil rights enforcement capacity at the state level. Even if the federal Office for Civil Rights is weakened or relocated, Oklahoma students deserve a mechanism to report and resolve discrimination in educational settings.

Support HBCU and tribal college stability specifically. These institutions are most vulnerable to the combined effect of accreditation uncertainty, funding disruption, and reduced civil rights oversight. Targeted state investment, if federal funding contracts, is both a moral and economic imperative.

Conclusion

The question is not whether the federal Department of Education has room for improvement. The question is whether the institutions and students that depend on its functions, specifically accreditation oversight, federal financial aid, and civil rights enforcement, can absorb a sudden and poorly structured transfer of those responsibilities to states that are not prepared to carry them.

For Oklahoma, the risks are concrete. A state already stretched thin on higher education appropriations, already facing significant college readiness gaps, and already home to institutions with specific and specialized missions, including tribal colleges, vocational programs, and an HBCU, cannot simply absorb these responsibilities without direction, infrastructure, and investment.

This briefing is not a call to preserve the status quo without scrutiny. It is a call for deliberate, well-resourced, and coordinated planning before changes are made that cannot easily be undone. The students, educators, and communities who depend on Oklahoma's higher education system deserve no less.

How The Herron Group Can Help

The challenges outlined in this briefing are systems problems, and they require systems solutions. Building a stable, sustainable infrastructure for accreditation, measurement, and

institutional accountability at the state level is precisely the kind of work The Herron Group was built to do.

Measurement Design. If Oklahoma is to build or expand accreditation governance, it needs measurement frameworks that can evaluate institutional quality, track student outcomes, monitor financial stability, and produce data that is credible, consistent, and defensible. THG designs these frameworks. We build the instruments, data collection systems, and reporting structures that make institutional performance visible and actionable.

Systems Strategy. Accreditation is not a single function. It is a system of interconnected processes: standards development, institutional review, site visits, appeals, interstate coordination, and ongoing monitoring. Building that system requires designing how those pieces connect, where information flows, who makes decisions, and how the system adapts as conditions change. With more than 20 years of experience navigating higher education, nonprofit, and public-sector systems at the leadership level, THG understands how these institutions actually operate.

If your state or institution is preparing for accreditation changes and wants to build from a position of evidence rather than reaction, contact The Herron Group.

Dr. Marsha Herron | Founder and Lead Consultant

marshah@theherrongrouppllc.net | theherrongrouppllc.net

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