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# 1 Step 1. Letter to US Department of Education / Federal Student Aid

#### 1.1 Requirements

The Department of Education published the most recent guidance on the process for changing accreditors as a Dear Colleagues letter on May 1, 2025. This letter, (GEN-25-03) Changes to the Approval Process for Changing Accrediting Agencies, supercedes all previous guidance, including GEN-22-10 and GEN-22-11.

In summary, the letter states institutions must submit all materials related to prior accreditation and demonstrate reasonable cause for changing accrediting agencies to the Department of Education. The Department will conduct an expeditious review of applications, except in rare cases where an institution lacks reasonable cause. Institutions have the freedom to change accrediting agencies or have multiple accrediting agencies without disincentives or prohibitions. The Department will approve changes if institutions meet specific criteria, such as compliance with state laws or shifts in academic programs. Additionally, state legislatures have the authority to manage public institutions, and the Department cannot interfere with this authority.

The new process appears much simpler than the previous one. The new process requires submitting the Reasonable Cause Request Certification after which the letter states the "Department will find the cause to be reasonable and approve a change in accrediting agency, or adding an accrediting agency, if an institution submits all materials related to its prior accreditation or preaccreditation, as required by 34 CFR § 600.11(a)(1) and 34 CFR § 600.11(b), and it does not fall under the prohibitions in 34 CFR § 600.11(a)(1)(ii) or 34 CFR § 600.11(b)(2)(i)." It further states, "if the institution otherwise meets the requirements set out in law and regulation, in these cases the Department will determine that an institution has reasonable cause and therefore approve a change in accrediting agency for institutions that are required to do so based on State action."

In the past, this step was anticipated to take 6 to 9 months. The new process has reduced this to 30 days. The Department will not approve a change in accrediting agency if the institution is on probation or has been sanctioned by its current accredi-

the clare of its receipt of a complete notice of this change and materials demonstrating reasonable cause, approval will be deemed to have been granted, unless the change or multiple accreditation is prohibited as described above."

### 1.2 Model Letter under the old process

The following is a sample letter to the Department of Education requesting approval to change accreditors. This letter is based on the previous process. Institutions beginning this process should follow the guidance in the Dear Colleague letter, GEN-25-03, referenced above. This letter is provided for historical purposes only.

Model Community College 123 College Avenue Anytown, ST 12345

April 7, 2025

U.S. Department of Education Office of Federal Student Aid 400 Maryland Avenue, SW Washington, DC 20202

Dear Sir or Madam:

Re: Request for Approval to Change Primary Accreditor under 34 CFR 600.11(a)(1)

I am writing on behalf of Model Community College to formally request approval from the U.S. Department of Education to seek accreditation with the Higher Learning Commission (HLC) as our new institutional accrediting agency, pursuant to 34 CFR § 600.11(a)(1). In making this request, the College affirms that we are seeking to change our primary accreditor (from our current accreditor, the Southern Association of Colleges and Schools Commission on Colleges, SACSCOC) and are not pursuing dual institutional accreditation. We respectfully seek the Department's permission to initiate this change prior to any formal engagement with HLC.

Model Community College is a public, accredited institution in good standing with SACSCOC. Our accreditation by SACSCOC was last reaffirmed in 2019 and remains valid through June 2029. We have not been subject to any adverse actions, such as probation or sanctions, in the past 24 months or at any point during our current accreditation cycle. We will continue to honor all obligations to SACSCOC and maintain compliance with SACSCOC standards throughout the transition period. Once HLC accreditation is obtained, we plan to relinquish SACSCOC accreditation so that we will have only one institutional accreditor of record at any given time, as required.

reason for seeking a change of accreditor at this time is a combination of preference in our state's higher education policies and our institution's strategic plants are forts. Recent state legislation now encourages (and in our case, effectively equires) institutions to periodically change their accrediting agency. In light of this external mandate, our Board of Trustees and leadership conducted a thorough review of federally recognized accrediting agencies to determine the best fit for our college's future. Concurrently, as part of our mission-driven strategic plan, we have identified a need to align with an accrediting body whose standards and review processes more closely match our institutional mission, student population, and long-term goals. After careful consideration of several potential accreditors, we have concluded that the Higher Learning Commission offers an accreditation framework that is most in alignment with our needs and vision. This decision was made proactively from a position of strength — not to lessen oversight or rigor, and not in response to any deficiencies with our current accreditor, but rather to embrace an accreditor whose philosophy and emphasis will best support our continuous improvement.

Throughout our decision-making process, we have engaged in substantive communication with SACSCOC. The College's intentions to explore a change in accreditor have been discussed with SACSCOC leadership in a timely and transparent manner. SACSCOC has been made aware of our intent to seek accreditation with HLC, and we will continue to keep SACSCOC informed as we move forward. To date, however, we have not initiated any formal application, candidacy, or correspondence with HLC. We are fully mindful of the requirement to obtain Department approval prior to engaging with a new accrediting agency, and we have honored that requirement.

We believe that HLC's standards and evaluative approach align exceptionally well with Model Community College's mission and will bolster our efforts toward ongoing institutional excellence. HLC's Criteria for Accreditation place strong emphasis on an institution's mission, ethical conduct, assessment of student learning, and continuous quality improvement. These priorities resonate with Model Community College's core values and strategic objectives. For example, one of our strategic goals is to foster a culture of evidence-based improvement in teaching and learning; HLC's peer-review process and its expectation for regular assessment and institutional effectiveness closely mirror this goal. We are confident that under HLC accreditation, the College will further strengthen its outcomes in areas such as student success, curricular innovation, and community engagement. In short, the HLC accreditation framework — which encourages colleges to exceed minimum standards and pursue ongoing enhancement — is well-suited to support and amplify our mission of providing high-quality, accessible education and driving continuous improvement.

In summary, Model Community College respectfully requests the Department's approval to change our primary institutional accreditor from SACSCOC to the Higher Learning Commission. We believe we have demonstrated a sound and reasonable

conthis change, grounded in compliance with new state requirements and a destruction better align with an accreditor that will support our mission and continuous programment efforts. We are committed to maintaining full compliance with SACSCOC standards until such time as HLC accreditation is achieved and the transition is complete, per federal requirements. We have enclosed documentation to substantiate our current accreditation status and good standing, as well as the institutional support for this endeavor.

Thank you for your consideration of this request. We are prepared to provide any additional information or materials that you may require. Please do not hesitate to contact me at [phone number] or [email address] if you have questions or need further clarification.

Sincerely,

Jane M. Smith, Ph.D.
President, Model Community College

Enclosures: (Supporting documentation to accompany this request)

- SACSCOC Reaffirmation Letter (Accreditation through June 2029): Official letter from SACSCOC confirming Model Community College's accreditation status and term, demonstrating good standing through the next reaffirmation date.
- Statement of Accreditation and Good Standing: Documentation (if available) from SACSCOC verifying that the College is in good standing with no sanctions or probationary actions.
- Board of Trustees Resolution Change of Accreditor Approval: Copy of the resolution passed by the Model Community College District Board of Trustees authorizing pursuit of HLC accreditation as the College's sole accreditor.
- Relevant State Legislation Excerpt: Copy or summary of the pertinent state statute/ policy that prompts or requires the institution to seek a new accrediting agency (illustrating the external mandate influencing this request).
- All SACSCOC communications since last reaffirmation: Include all the relevant official communications between SACSCOC and Model Community College since the last reaffirmation.

### 1.3 Actual Sample Letters

#### 1.3.a Haywood Community College

- 2024-09-30 Initial Letter
- 2024-11-26 USED Request for additional information
- 2025-03-20 USED Approval Letter

## Bibliography