



**Statement from the Association of Specialized and Professional Accreditors (ASPA)
On the Composition of the Accreditation, Innovation, and Modernization (AIM) Negotiated
Rulemaking Committee**

The Association of Specialized and Professional Accreditors (ASPA) is deeply concerned by the composition of the U.S. Department of Education’s Accreditation, Innovation, and Modernization (AIM) negotiated rulemaking committee.

In its January 27, 2026, Federal Register [notice](#) announcing its intent to form the AIM negotiated rulemaking committee, the Department stated:

“We intend to select negotiators for the Committee who represent the interests of those significantly affected by the issues proposed for negotiation. In so doing, we will comply with the requirement in section 492(b)(1) of the HEA ([20 U.S.C. 1098a](#)) that the individuals selected must have demonstrated expertise or experience in the relevant topics proposed for negotiations.”

Despite the central role that programmatic accreditors play in assuring the quality of thousands of degree programs that lead to practice in highly technical and complex fields—fields that enrich, care for, protect, and advance the lives of millions of people—no Secretary-recognized programmatic accrediting agency leaders have been appointed to serve as primary negotiators in this process. This omission is particularly concerning given that, by virtue of their recognition, these accreditors have been determined by the Department to be “reliable authorities as to the quality of education.”

The omission is both striking and consequential. Thirty-seven of sixty-one Secretary-recognized accreditors are programmatic—more than 60 percent of all recognized accreditors. Yet the Department has failed to appoint a representative of this largest group as a primary negotiator, even though they will be “significantly affected” by any rules resulting from the AIM rulemaking process. In doing so, the Department has not fully met its statutory obligation under section 492(b)(1).

Under 34 CFR Part 602, the Secretary recognizes accrediting agencies based on their demonstrated ability to ensure educational quality and protect the interests of students and the public. Programmatic accreditors are uniquely responsible for evaluating program-level outcomes tied to student success, including graduation and retention rates, employment outcomes, licensure pass rates, and demonstrated competencies for graduates entering professions that directly serve and protect the public. These responsibilities are central to the Department’s own recognition framework. Excluding these subject-matter experts from a primary role in a rulemaking process focused on accreditation policy risks disregarding the very entities charged under federal regulation with carrying out these responsibilities.

Negotiated rulemaking is intended to bring all key stakeholders to the table—particularly those with direct operational responsibility and regulatory accountability. The absence of Secretary-recognized programmatic accreditors in a primary seat on the AIM committee undermines that purpose and raises serious concerns about whether the resulting proposals will be informed by the full scope of expertise required under federal law. The Department has not satisfied the plain meaning in its own notice to include “programmatic accrediting agencies recognized by the Secretary under 34 CFR part 602.”

ASPA and its members strongly urge the Department to ensure meaningful representation of currently recognized programmatic accreditors by adding a primary voting seat to the AIM committee.

A durable and effective accreditation framework—grounded in the principles and requirements of 34 CFR Part 602—depends on inclusive, informed, and good-faith policymaking. Programmatic accreditors must have a voting seat at the table to ensure the integrity of that process.

About ASPA

ASPA is a national voluntary association of 59 specialized and professional accreditors that advance accreditation policy and practice and collectively accredit more than 28,000 programs at postsecondary institutions worldwide.