

**LETTER** *Published September 23, 2025 • 6 minute read*

# Comments to the Commission for Public Higher Education on Draft Accreditation Standards



*Emily Rounds, Education Policy Advisor*

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**Re: Request for comments regarding draft accreditation standards**

Dear Commission for Public Higher Education Board of Directors:

Thank you for the opportunity to provide comments on the Commission for Public Higher Education's (CPHE) draft accreditation standards.

CPHE states that its standards “focus on student outcomes rather than on inputs as indicators of excellence” and aim to “streamline accreditation processes through process simplification, efficiency,

and clarity.” Third Way broadly supports accreditation reforms to strengthen student outcomes and achievement in higher education. However, CPHE’s standards, as drafted, lack the clarity and specificity needed to hold institutions accountable for strong student outcomes. The current standards are vague, and it is difficult to understand how the organization will implement them consistently across institutions. The drafted standards also fail to differentiate CPHE as an outcomes-based accreditor in comparison to other accreditors or organizations seeking to become recognized accreditors.

CPHE has not yet published guidance or policy documents to accompany the drafted standards, which makes giving recommendations for the standards challenging. Other accreditors use such resources to explain accreditation procedures and the technicalities of their standards. Some of our comments therefore reference recommendations that, if not ultimately reflected in the standards, should be included in CPHE’s policy and guidance resources.

Future versions of CPHE’s standards should prioritize providing operational definitions for key terms, specifying data sources, describing outcomes, and outlining timelines for assessment and improvement. Additionally, the *Higher Education Act* requires accreditors to include a standard about “recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertisement,” which we do not see specifically addressed in this draft.<sup>1</sup> To meet the Department’s requirements to become an accreditor, CPHE will need to include that standard.

The following recommendations outline changes that would make CPHE’s standards and implementation resources clearer and better reflect the organization’s stated mission and purpose.

## **Integrity, Transparency, and Compliance**

CPHE should define the term “integrity” in Standard 1 and clarify how institutions are expected to demonstrate this quality. Are institutions expected to prove their integrity through qualitative or quantitative data? What information or data should institutions expect to submit to be assessed on this standard? “Integrity” is not an easily quantifiable metric, so CPHE should provide an operational definition in guidance and policy documents so the standard can be understood and enforced across institutions.

In Standard 2, CPHE should define “transparent” and identify, in the standard or additional resources, the target audience for institutional transparency. For example, should institutional policies and practices be made transparent for the Department of Education, students, the public, and/or other stakeholders?

Standard 3 requires that an institution publish “accurate information regarding its policies and practices,” but it fails to specify what kind of information that means and where it should be published. CPHE should define “policies and practices” and explain where institutions should publish that

information. We recommend that this information be published electronically and physically in readily accessible formats for students and the public to reference. This definition and explanation may be best suited for inclusion in CPHE policy documents when published.

Standard 8 requires institutions to report incidents of non-compliance “upon receipt of reasonable evidence.” CPHE should define “receipt” (written, verbal, electronic, physical) and “reasonable evidence” in policy documents, as those terms could be subjective.

Regulations allow accreditors to establish standards in addition to those required by the Department, such as those about integrity and transparency in this section.<sup>2</sup> However, the agency’s standards must be clear and applied and enforced consistently across institutions.<sup>3</sup> CPHE must clarify its terminology, methodology, and application of standards in forthcoming resources and guidance.

## **Continuous Improvement**

Standard 9 outlines how institutions should promote continuous improvement, but the standard leaves much up to interpretation. To strengthen it, CPHE should publish policy documents that give examples of what the processes for continuous improvement may look like at an institution. We also recommend that CPHE define how outcomes will be measured against goals—how those terms are defined, data sources that institutions can use, and methodologies that meet the standard. To report improvement in student outcomes, Third Way recommends that institutions be required to use publicly available, reliable federal data sources to avoid permitting self-reported data.<sup>4</sup> The requirement to use reliable, non-self-reported data should be included in the standard itself. Additional resources should also include a timeline and process for how institutions are expected to demonstrate their commitment to continuous improvement.

## **Mission and Public Purpose**

In Standard 13, CPHE states that institutions are expected to advance “the common good” and “well-being of the public.” These terms should be defined in the standard, and in additional documents, CPHE should explain how these outcomes are to be measured. For example, will they be measured through qualitative surveys (e.g., public perception of higher education), quantitative data (e.g., return on investment to the state, jobs created), or a combination of methods? Additionally, CPHE should help institutions define where impact will be measured—at the town, county, state, or national level, for example. Area of impact may differ by institution type as CPHE sees fit.

## **Academic Freedom and Viewpoint Diversity**

We recommend that, in policy documents, CPHE create operational definitions for “academic freedom” and “diversity of viewpoints” (referenced in Standards 15 and 16, respectively) so institutions

measure these terms consistently and in alignment with CPHE's stated aims.

## **Student Success and Student Support Services**

As an accreditor that seeks to promote student outcomes, it is critical that CPHE strengthen Standard 19. Standard 19 starts by stating a requirement that an “institution employs best practices to measure and improve student success as assessed by varied methods,” and it goes on to list examples of metrics. To hold institutions accountable for strong outcomes, CPHE should require institutions to measure student success in the same way—using consistent, well-defined metrics and reliable data sources. We recommend that CPHE require institutions to measure completion rates, year-to-year persistence rates, return on investment (through a metric like Third Way's Price-to-Earnings Premium), job placement rates, and student borrowing levels.<sup>5</sup> Institutions should be required to calculate those metrics using publicly available federal data sources. The list of metrics and requirements for reliable data should be specified in the standard.

We also recommend that CPHE set benchmarks for student outcomes. Benchmarks will make student success expectations clear for institutions and, if set at a rigorous level, set CPHE apart as an accreditor of truly high-performing schools. In cases where institutions need to improve their outcomes, CPHE should also set expectations for the scope and timeline for improvement. Telling institutions to “improve” is too general—that could mean improving, for example, a graduation rate by 1% over five years or 20% over five years. Details on benchmarks and improvement can be detailed in additional CPHE policy documents.

## **Concluding Remarks**

These recommendations are intended to inform the Commission's efforts to improve their standards. Third Way encourages CPHE to take a true outcomes-based approach when revising its standards, focusing on how the organization can hold institutions accountable for excellent outcomes. We thank the Board of Directors for its time considering these recommendations. Please do not hesitate to contact us should you have any questions about these comments.

Sincerely,

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TOPICS

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## ENDNOTES

1. “Recognition of accreditation agency or association.” 20 U.S. Code § 1099b, <https://www.law.cornell.edu/uscode/text/20/1099b>. Accessed 9 Sept. 2025.
2. “Accreditation and preaccreditation standards.” 34 CFR Part 602.16. <https://www.law.cornell.edu/cfr/text/34/part-602/subpart-B>. Accessed 12 Sept. 2025.
3. “Application of standards in reaching accreditation decisions.” 34 CFR Part 602.17. <https://www.law.cornell.edu/cfr/text/34/part-602/subpart-B>. Accessed 12 Sept. 2025; “Ensuring consistency in decision-making.” 34 CFR Part 602.18. <https://www.law.cornell.edu/cfr/text/34/part-602/subpart-B>. Accessed 12 Sept. 2025.
4. Rounds, Emily. “Improving How Accreditors Measure Student Achievement in Negotiated Rulemaking.” Third Way, Dec. 2023, <https://www.thirdway.org/blog/improving-how-accreditors-measure-student-achievement-in-negotiated-rulemaking>, Accessed 9 Sept. 2025.
5. Third Way. “2024 Price-to-Earnings Premium.” Higher Ed Value Metrics. <https://www.higheredvaluemetrics.org/price-to-earnings-premium/2024>. Accessed 11 Sept. 2025.