

LETTER *Published April 1, 2026 · 4 minute read*

Comments to the Commission for Public Higher Education Regarding Draft Evidentiary Guidance for Accreditation Standards

Emily Rounds

Re: Request for comments regarding draft evidentiary guidance for accreditation standards

March 4, 2026

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 evidentiary guidance for accreditation standards.

Throughout this document, CPHE elevates its stated commitment to student success, including listing it as a trait and practice that will set the aspiring accreditor apart from other agencies. Third Way supports genuine efforts to improve student achievement through the accreditation process, and we are pleased to see this inclusion. However, CPHE's current explanations for how it will bolster student success are insufficient. The Commission should further clarify the steps it will take to improve outcomes at its institutions, standardize metrics and reliable data sources to measure success, and integrate student success into its standard for continuous improvement.

We recommend that the Commission particularly focus on strengthening its standards for student success. Our suggestions are outlined below, and we welcome further conversation to clarify our concerns and proposals.

Student Success and Student Support Services

While we are glad to see that CPHE has included a standard on student success, it presently lacks the detail and rigor needed to promote strong outcomes. We recommend that the Commission use stronger language in the "required evidence" sub-section to mandate that institutions report success measure and best practices. As currently written, CPHE uses phrases including "*may demonstrate*," "*metrics should ordinarily include*," and "*may use data*." We recommend replacing this with language that reflects the mandatory nature of reporting these data and practices. Secondly, CPHE should clarify the overlap in bullets one and three under the "required evidence" section. The first bullet requires an institution to submit its IPEDS completion and retention rates to the Commission, but the third bullet states that institutions "should ordinarily" report those metrics, along with others. CPHE should clarify this vagueness. Definitions and methodology for these metrics should be uniform to ensure consistency across institutions' student success reporting. We also recommend that under the fourth bullet in "required evidence" that CPHE list examples of how institutions can report evidence regarding student debt. This could include average debt for the five most recent cohorts or a debt-to-earnings ratio, for example.

Additionally, CPHE should work with its institutions to set performance benchmarks for success. This might look different across institutions, and CPHE can work with its member schools to set goals that make sense for each. Benchmarks are critical for tracking improvement and ensuring a baseline level of educational quality for students. This will help the Commission track an institution's performance year-to-year and measure whether the school is meeting its goals. CPHE should also consider publishing institutions' benchmarks publicly to bolster transparency and trust with the public.

We also ask that CPHE consider implementing a timeline when institutions will be required to report their student outcomes. Reporting data on a consistent schedule will help the Commission track the institution's progress. This method would be consistent with actions that the federal government has taken in the *One Big Beautiful Bill Act* to require that institutions report program-level earnings outcomes for prior cohorts on an annual basis. Reporting outcomes only during the year a school is up for accreditation review or leaving the decision up to the schools may not be an acceptable threshold to truly demonstrate a pattern of improvement.

Lastly, we urge the Commission to offer a set of options that institutions can use to measure ROI. Currently, the Commission does not dictate a methodology for measuring ROI, and providing a menu of examples could be helpful. One measure that CPHE could provide is Third Way's Price-to-Earnings Premium, which measures the number of years it takes a student to recoup their investment at a given school.¹ The PEP is an accessible metric that uses federal data to calculate institutional ROI, though state data could also be used if it is available and more accurate. The Commission could present institutions with a list of options that are commonly used in the field to present ROI data, making the methodologies more accessible for institutions navigating the calculations, and mandate that they select one or more to report on continuously.

Concluding Remarks

These recommendations are intended to inform the CPHE's efforts to improve its evidentiary guidance and strengthen its commitment to an outcomes-based accreditation process. Third Way encourages CPHE to examine where and how it can improve measures to promote strong outcomes and hold institutions accountable for their performance. We thank the Board of Directors for its time considering these recommendations. Please contact us should you have any questions about these comments.

Sincerely,

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ENDNOTES



1. Third Way. “2024 Price-to-Earnings Premium.” Higher Ed Value Metrics.
<https://www.higheredvaluemetrics.org/price-to-earnings-premium/2024>.
Accessed 11 Sept. 2025.