

LETTER *Published November 12, 2024 · 4 minute read*

Comments to the Postsecondary Commission on Earnings and Outcomes in Their Revised Accreditation Standards



Emily Rounds, Education Policy Advisor, Lanae Erickson, Senior Vice President for Social Policy, Education & Politics

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Re: Accreditation Standards September 2024

Dear Mr. Leschly:

Thank you for the opportunity to provide comment on the Postsecondary Commission's revised standards on the value-added earnings and absolute earnings outcomes.

Third Way strongly supports reforms to strengthen the use of student achievement outcomes and consistent standards in accreditation. As the watchdogs of higher education, accreditors are charged with ensuring that federally-funded colleges provide a valuable education to students and can be trusted to use taxpayer dollars responsibly. When accreditors fail to execute this role, students and taxpayers pay the price. Last year, 37% of accredited, predominantly bachelor's degree-granting institutions graduated less than *half* of their students, and those colleges received, in total, \$20 billion in taxpayer dollars.

We are concerned that the Postsecondary Commission's additions of Standards 2.2 and 3.2 in its accreditation standards will fail to hold institutions accountable for poor outcomes. Standards that are lenient, not specific, and offer institutions the ability to calculate their own earnings metrics can create loopholes for underperforming institutions to artificially inflate metrics to maintain their accreditation status. If the Postsecondary Commission aims to be an agency that prioritizes outcomes, the added standards fall far short of that goal.

To better prioritize student outcomes, the Postsecondary Commission's standards should mandate the use of robust, comprehensive, and reliable data sources to calculate outcomes metrics, require outcomes to be disaggregated by student sub-populations, and not allow institutions to calculate their own metrics with their own data.

The comments below highlight Third Way's areas of greatest concern regarding the new standards — 2.2 and 3.2.

Comments on Standards 2.2 and 3.2

Earnings outcomes are one way to gauge the quality and value that an institution provides its students. Using earnings data allows us to understand whether a school provides attendees with a return on investment or an earnings premium over someone with a high school diploma, for example. The Postsecondary Commission's earnings measures center the agency's standards around college value. Ensuring that these metrics are accurate and well-constructed is vital to fulfilling the Postsecondary Commission's quality assurance responsibilities to current and prospective students.

Standards 2.2 and 3.2 offer institutions the authority to calculate value-added earnings and absolute earnings outcomes themselves, rather than the Postsecondary Commission calculating those metrics as part of its accreditor review of the institution. As stated above, accreditor standards should be specific and consistently enforced. Creating an option through which colleges can essentially do the work for the accreditor—calculating and submitting their own student outcome metrics—does not allow the Postsecondary Commission to effectively assess nor enforce student outcome measures.

The quality and effective use of data must be of utmost importance when assessing an institution's outcomes. While in other parts of the standards it appears that the Postsecondary Commission will use reliable, public data sources to calculate outcomes, a school using the "institution-directed" approach will submit "evidence it compiles itself." All institutions sharing an accreditor should be subject to the same metrics using the same federal and state data sources to avoid biased reporting and sampling. And in collaboration with the Postsecondary Commission, every institution's data should be disaggregated by student sub-populations, exposing potential outcomes differences by, for example, race or gender. If institutions can self-select the data that they report, it can be easily skewed to reflect their outcomes in a more positive light. Lenient regulations like these can attract underperforming schools that opt for the "institution-directed" approaches as loopholes to make themselves look better and maintain their accreditation status.

Additionally, it is not clear whether the institution must reapply for the option to self-report data every time that it goes through the accreditor review process. And there are no published details on how the Postsecondary Commission intends to evaluate how a college may qualify for the "institution-directed" approach. We worry that, with this option, underperforming institutions are more likely to request this option to avoid further scrutiny from the agency.

If the Postsecondary Commission aspires to be an outcomes-based, quality-centered accreditation agency, it must hold the institutions it accredits to consistently high standards and use reliable, accurate data sources for *all* institutions. The updated standards will go against the Postsecondary Commission's publicly stated goals, allowing underperforming institutions to artificially bolster their outcomes, maintain their accreditation status, and continue to fail students and taxpayers.

Sincerely,

Emily Rounds
Education Policy Advisor
Third Way
erounds@thirdway.org

Lanae Erickson
Senior Vice President, Social Policy, Education & Politics
Third Way
lerickson@thirdway.org