

**LETTER** *Published February 26, 2025 • 3 minute read*

# Comments to the Postsecondary Commission on Earnings Metrics in Their Revised Standards



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

February 26, 2025

**Re: Accreditation Standards January 2025**

Dear Mr. Leschly:

Thank you for the opportunity to provide comment on the Postsecondary Commission’s revised standards, which move substantial segments of “Standards Area 2: Value-added Earnings Outcomes” and “Standards Area 3: Absolute Earnings Outcomes” to longer-form policy documents.

While the notice inviting public comment attempts to frame these revisions as mere technicalities, they in fact represent a fundamental pivot that weakens the Commission's standards.

Put simply, the Postsecondary Commission's proposed changes contradict the Commission's self-proclaimed goal to be an outcomes-based accreditor. Moving language about value-added and absolute earnings outcomes metrics to its policy documents allows the Commission to change those metrics, the data used to calculate them, and the corresponding benchmarks that it sets for institutions without a formal public comment period. This means that the Postsecondary Commission could edit or even eliminate the metrics at will, opening a back door for predatory colleges to gain or maintain accreditation, harm students, and abuse taxpayer-funded financial aid dollars.

The Commission's outcomes metrics are so complex that even small tweaks could substantially lower the benchmarks to which institutions are held. No one should have to inspect the Postsecondary Commission's policy documents with a fine tooth comb to find changes to the organization's policies. Alerting the public about these changes with a comment period is critical for general awareness and for holding colleges accountable to strong and consistent metrics.

In public events and meetings with Third Way, Mr. Leschly and his staff have sought to assure us that the Commission is dedicated to an outcomes-based approach to accreditation. When Mr. Leschly spoke at an American Enterprise Institute event on "The Future of University Accreditation" in June 2024, he said that the Commission is "particularly focused as an accreditor on economic outcomes, since they're so important to such a large majority of students," and that the organization "will... go on to set standards and bright line accountability around wage outcomes." But the revised standards, which only include traces of the original value-added and earnings-based metrics, do not reflect that commitment to students and accountability.

Third Way and the Postsecondary Commission are aligned in recognizing that our higher education accreditation system needs to be reformed. From our meetings with Mr. Leschly and his colleagues, we thought that we were on a similar page in prioritizing student outcomes in accreditation. However, the Commission's revised standards reveal that we favor very different paths in accomplishing accreditation reform. Students and taxpayers will not benefit from value metrics that can change on a whim without input from the public.

Our nation's accreditation system is flawed and has too few checks and balances on accreditors and the institutions that they oversee. Taxpayer dollars continue to flow to institutions with abysmal graduation rates, and as long as they remain accredited, these schools will continue to leave students worse off than if they had not pursued a credential. The last thing the accreditation space needs is a new agency that tweaks its outcomes metrics to accommodate colleges that leave students behind. If the Postsecondary Commission is going to be an outcomes-based accreditor, it needs to live up to that title and center its standards around student outcomes.

Third Way strongly discourages the Postsecondary Commission from pursuing its proposed changes. If the Commission is approved as a recognized accreditor with these revised standards, it will fail to hold colleges accountable for poor outcomes, and students and taxpayers will pay the price.

Sincerely,

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