



February 28, 2025

Postsecondary Commission Staff and Board

Re: Postsecondary Commission's January 2025 Proposed Standards

Dear Postsecondary Commission Staff and Board,

Thank you for the opportunity to comment on the Postsecondary Commission's (PSC) January 2025 iteration of proposed standards.

This iteration largely strikes the outcomes-based standards that PSC proclaims set it above the curve among other accrediting agencies, to instead place such requirements in longer-form policy documents that can be changed without notice. This change effectively leaves little to comment on, since these policy documents do not yet exist in the public sphere. It also raises concerns that PSC is unable to deliver on the standards or even the concepts it initially proposed and is now making changes with little transparency and without public input. Far from the transparent and evidence-based accreditor holding institutions accountable to rigorous standards that PSC has claimed itself to be, in reality PSC appears to be selling a lot of sizzle, without much steak.

Throughout the three iterations of standards that PSC has put out for public comment, we've seen a consistent watering down of what those standards contain and it is no longer clear what PSC's goal is, what it hopes to measure, how, or whether such a measure is even feasible. The first iteration contained somewhat detailed standards on value-added earnings and outcomes. In response to that iteration, New America submitted comments raising concerns that the standards failed to meet the level of specificity and rigor required of an effective accrediting agency and cautioned that very few States would have the data necessary to evaluate such outcomes, among other concerns.¹

In admission of this data challenge, PSC's second iteration of standards created a carve out to allow institutions to comply with PSC's standards based on proprietary data or data provided by an institution itself. In communication to PSC's sole partner institution at the time, Texas State Technical College (TSTC), PSC stated that the change was intended only to apply to institutions

¹ [Postsecondary Commission Standards Comments](#)

located in states where PSC does not have direct access to student earnings data.² This suggests that the standards PSC initially proposed would be unworkable for the majority of institutions and it is not clear what standards such institutions would be held to or how such data would be evaluated. At that time, New America raised concerns that by adding the ability for schools to determine which data should be used to evaluate their own success, PSC was providing a significant loophole to its own approach to accreditation.

Finally, the most recent iteration, strikes the majority of text from its value-added standards entirely, and moves them to the agency's policy documents. While PSC states that this is to simplify and clarify the standards without changing their meaning, these documents do not exist publicly. Further, based on a public records request, TSTC internal documents state that PSC is concerned it will not get the data needed and PSC is exploring alternatives for TSTC to comply with the standards it initially outlined. This suggests the standards as originally drafted are entirely unworkable and without seeing the policy documents PSC intends to use, we have no reason to believe the meaning is not changed and the expectations remain rigorous.

Placing metrics intended to measure success and hold institutions accountable into policy documents limits PSC's ability to take action when necessary and limits the ability for informed public comment and is a significant change.

By moving the outcomes based standards that PSC has claimed make it revolutionary, into as yet unpublished policy documents, PSC is circumventing the ability of its member schools and other interested parties to consider and provide comment on changes to these standards. In fact, PSC explicitly states that "PSC's Commission or senior staff may amend, withdraw, delete, or add to its policies and procedures at any time..without a formal public comment period."³ Placing the most critical standards into policy documents that can be changed at any time to fit an institution's ability to comply renders the standards meaningless. Agencies should be drafting rigorous standards that institutions are expected to meet rather than modifying them to fit the institutions the agency hopes to accredit, which appears to be the current approach.

At every turn, PSC has failed to do what it said it would. There is no reason to believe that this is a workable model. While we appreciate PSC's attempt to be forward thinking and data driven, PSC appears to be stuck on a measure that is frankly unworkable. Rather than stick to an imperfect and immeasurable metric, PSC should develop standards that can be applied, measured, and enforced consistently for all of the institutions it hopes to accredit. Additionally, PSC should maintain metrics in its standards so that it can rigorously enforce them when an institution fails to meet them. Finally, as an aspiring accreditor with goals of establishing a new model of accreditation and maintaining public confidence in its processes, PSC should be transparent and seek public comment on all of its documents, to further strengthen its work.

In addition to the above concerns, PSC continues to hold to a minimum earning standard that is far too low. We have commented on this before, but believe it is worth drawing further attention

² Based on public records request of communication between PSC and Texas State Technical College. Email from Jen Dirmeyer of the Postsecondary Commission to TSTC staff.

³ [Review of and Revisions to PSC's Standards, Policies and Procedures](#), accessed 02.28.2025

to the issue. The current standard 3.1 for “Required Minimum Earnings” requires that a graduate of a PSC accredited institution must earn more than 150% of the Federal Poverty Level for a single person, without regard to that individual's family size. Even more concerning, 150% of FPL for a single person is currently \$23,475, annually.⁴ The [median income for a high school graduate aged 25-30 in Texas](#) in 2022 was \$37,520.⁵

The minimum income standard makes it seem like PSC thinks that someone earning \$14,000 less than the state median for a high school graduate should be considered a success story.⁶ This standard has to be stronger for it to have any meaning.

Thank you for considering our comments.
New America Higher Education Policy Program.

⁴ Federal Poverty Guidelines <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

⁵ At present, Texas State Technical College is the only institution we are aware of working with PSC, which is why we use this comparison.

⁶ We acknowledge there is some discrepancy in the data here due to the differences in years, but even using the 2022 FPL of \$20,385, PSC’s standard fails to come close to the median income for a high school graduate in the state aged 25-30