February 28, 2025

Postsecondary Commission Staff and Board

Re: Postsecondary Commission's June 2025 Proposed Standards

Dear Postsecondary Commission Staff and Board, Thank you for the opportunity to comment on the Postsecondary Commission's (PSC) June 2025 iteration of proposed standards.

We have reviewed the latest set of changes to PSC's accreditation standards and while there are some positive changes in this version, we are disappointed to see additional details on evaluating outcomes removed compared to previous versions. Over the course of four iterations over 18 months, the current standards have become a shell of the first version and substantially different from the goals PSC initially laid out. It is difficult to adequately weigh in without additional information on why these changes are being made, and how these standards will be measured and applied in practice, which PSC has stated will be forthcoming in policy documents.

We have outlined specific concerns below. For ease of comparison, we have included the old and revised standards along with our analysis of the changes.

Standards Introduction

We applaud the change PSC has made in the introduction to its standards. Making it clear that colleges and universities are fully responsible for ensuring that third parties running courses abide by accreditation standards is a valuable change. Given repeated, and well-documented instances of colleges outsourcing programs to third parties that have then misled students, this plain language statement is much needed. In fact, other accreditors should consider similarly straightforward statements in their standards.

Standard 2.3 Value-added Earnings Outcomes of Program-specific Cohorts

Current Text	**Revised Text-June 2025**
Standard 2.3: Parity in Value-added Earnings Across Cohorts	**Standard 2.3: Value-added Earnings Outcomes of Program-specific Cohorts**
Across institution-wide cohorts of entering students, program-specific cohorts of entering	The institution exercises reasonable efforts to improve the value-added earnings outcomes

students, and demographically defined cohorts of entering students, the institution exercises reasonable efforts to reduce variation in the value-added earnings outcomes of Standard 2.1.	of program-specific cohorts of entering students that arise within the institution-wide cohorts of entering students governed by Standard 2.1 if these program-specific cohorts do not have cumulative value-added earnings that exceed net costs over an appropriate evaluation period.

The changes to Standard 2.3 remove the requirement that a college show it is making “reasonable efforts” to reduce the variation in value added earnings for “demographically defined cohorts of entering students”. Instead, colleges will only have to show they are making reasonable efforts to improve the valued added earnings at the cohort level for each program.

Put plainly, this change means that PSC will not evaluate whether colleges are failing to ensure that particular groups of students are seeing improvements in their earnings outcomes as long as each cohort does well on its earnings metric overall. This would make it possible for a college to fail to provide a boost to value-added earnings for, for example, Pell Grant eligible students, women, or Black students, but not be held accountable for those failings or required to address improvements that need to be made to ensure all students are successful. This represents a significantly less robust standard than the most recent text, and PSC should maintain consideration and evaluation of disaggregated data

Standard 3.2

Current Text	**Revised Text-June 2025**
Standard 3.2: Parity in Absolute Earnings Outcomes Across Cohorts	**Standard 3.2: Absolute Earnings Outcomes of Program-specific Cohorts**
Across institution-wide cohorts of completing students, program-specific cohorts of completing students, and demographically defined cohorts of completing students, the institution exercises reasonable efforts to reduce variation in the absolute earnings outcomes of Standard 3.1.	The institution exercises reasonable efforts to improve the absolute earnings outcomes of program-specific cohorts of completing students that arise within the institution-wide cohorts of completing students governed by Standard 3.1 if these program-specific cohorts do not have absolute earnings that are greater than 150% of the Federal poverty level (FPL) for a single person in 2 of the first 3 full calendar years following the academic year in which the cohort completed.

Similar to our comment on the changes to standard 2.3, we believe the changes to 3.2 represent a retreat from standards that require colleges to demonstrate a good faith effort to reduce variation in earnings outcomes between different demographically defined cohorts of students. We have previously commented that we believe the threshold for the absolute minimum earnings is too low, and continue to hold that concern. But, more importantly, it is important that accrediting agencies not just assess outcomes overall but for all of the populations an institution serves and risks sacrificing groups of students who already face higher barriers to college access and success in what appears to be an attempt to appease the current administration's attacks on the accreditation system.

Standard 4.1

Current Text	**Revised Text-June 2025**
Standard 4.1: Parity in Attainment Outcomes Across Cohorts	**Standard 4.1: Required Minimum Graduation Outcomes**
Across cohorts of entering students measured by the institution, the institution exercises reasonable efforts to reduce variation in attainment outcomes, including at least: ● Graduation rates. ● Year-to-year retention rates. ● Pass rates on licensure or certification exams, when required for employment.	The institution demonstrates that cohorts of entering students have graduation rates that are at least equal to the graduation rates of cohorts of entering students at a peer group of institutions.

The original version of this standard is one where PSC had a fairly robust approach. Requiring institutions to show they are working to reduce disparities in outcomes like graduation and retention rates, as well as licensure pass rates was a laudable goal, even if we believed it still required greater specificity. As above, we recommend that PSC maintain standards that require colleges and programs to evaluate disaggregated data and ensure parity.

Additionally, there is no information on who decides the peer group that PSC colleges would be compared to. If this part of the standard was more clearly defined, for example, if the comparison group was plainly spelled out, it would make the revised standard somewhat more robust, if still insufficient compared to the original text. It will be important for PSC to establish a structure on selecting a peer group of institutions in order to maintain rigor so that institutions are compared fairly against peers.

Finally, removing year to year retention rates and licensure passage means fewer metrics to measure success against. Removing licensure passage is particularly concerning, given how important it is for students to succeed in professions that require some form of licensure. We recommend PSC maintain evaluation of retention and licensure pass rates for programs where it is appropriate to do so.

Thank you for considering our comments.

New America Higher Education Policy Team