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September 16, 2025

Commission for Public Higher Education Staff and Board

RE: Comments on the Commission for Public Higher Education's Draft Standards

Thank you for the opportunity to comment on the Commission for Public Higher Education's proposed accreditation standards.

As one of three gatekeepers of Title IV financial aid programs in the Federal Triad, federally recognized accrediting agencies, which CPHE aspires to be, must take seriously the need for their standards and processes to be rigorous and transparent.

CPHE is unique in that it is funded by Florida taxpayers, owned by the Florida Board of Governors, and was introduced at a press conference by a governor who has spent the last year engaged in legal action challenging the constitutionality of the very premise in the Higher Education Act, that colleges be accredited before receiving federal student grants and loans.

Among the federal triad, which is comprised of States, the Federal government, and independent accrediting agencies, it is critical that CPHE demonstrate its independence from States, its reliance on expert peer review conducted by knowledgeable faculty and administrators, establish strong conflict of interest requirements, and that it uphold strong shared governance and academic freedom standards.

While we recognize the value in having clear, efficient standards, it is important that standards meet the specificity and rigor of an effective accrediting agency and are clear enough to be enforceable. Standards that are insufficiently precise or unmeasurable will fail to meet the needs of students, taxpayers, and other regulators. To that end, the evidentiary standards established by CPHE will be critical to understanding both the intent and effectiveness of CPHE's approach, particularly with respect to student success.

Our comments below provide general concerns followed by responses to each of the questions posed by CPHE.

## Independence/Conflicts of Interest

Among the required organizational and administrative requirements of federally recognized accrediting agencies is [one](#) that requires clear and effective controls, including guidelines, to prevent or resolve conflicts of interest, or the appearance of conflicts of interest for all associated with the agency. Among the questions that CPHE must clarify include:

- 1.) **What does it mean to be accountable to the States and how will CPHE remain free from the political whims of state politicians?** Among its core principles, CPHE states that the accrediting body must be accountable to the states. It is not clear what this directive means or what role states will play in what should be an independent evaluation free from political influence. It remains to be seen how an accrediting agency set up and funded by states can be truly independent from them, and CPHE must be able to demonstrate independence if it is going to serve as one leg of the program integrity triad.
- 2.) **What role does the Florida Board of Governors play and how will CPHE remain independent?** Board members have [raised](#) valid concerns about CPHE's independence and its own role which have gone unanswered.
- 3.) **How will CPHE establish conflict-of-interest policies that ensure robust accreditation processes that fairly evaluate institutions among its membership?** CPHE is made up of public university systems that have a clear interest in ensuring institutions within their systems maintain accreditation, and the access to federal aid that comes with it. CPHE has also established quick timelines to approve institutions and submit an application for recognition to the Department. It appears as though accreditation is a given and it is unlikely that loss of accreditation would be a real threat to institutions that fail to meet CPHE standards. Conflict of interest policies and the involvement of members outside of the public systems will be critical to CPHE's success and credibility.
- 4.) **Who will be responsible for assessing institutions?** It is important that CPHE establish strong policies and training for reviewers outside of the university systems involved in creating and overseeing the agency.

## Voluntary

The Higher Education Act establishes that recognized agencies must be established by a voluntary membership. While some systems, like Tennessee, have made clear that accreditation is a choice and CPHE is intended to provide another option, it is less clear whether other states will expect public institutions to "choose" to be accredited by CPHE. In order for CPHE to be effective and meet the requirements established in law, each of the systems should clarify that accreditation by CPHE is voluntary and leave it to each institution whether to maintain their current accreditation or seek accreditation from CPHE or another agency. To further support this point, CPHE could establish that decisions to become accredited by CPHE be made through a process of shared governance that considers input of faculty.

## Timeline

As noted in CPHE's documents, federal regulations require that an agency conduct accrediting activities for at least two years prior to seeking recognition. Yet CPHE's business plan establishes a timeline for submitting an application to the Department of Education for recognition as early as December 2025. CPHE should update its business plan to reflect a submission that would demonstrate two years of experience. It is vital that CPHE take the time to establish a strong foundation, including standards, policies, and procedures that will result in a strong accreditation process that assures quality.

## Questions posed by CPHE

- 1.) Do the draft CPHE standards fulfill the requirements of U.S. Department of Education regulations? If not, which Department requirements are missing from the CPHE draft standards?

- a. **Success with respect to student achievement.**

We appreciate CPHE's intent to focus on student outcomes as part of its core purpose. This is arguably the most important standard of quality—how students fare. We agree that metrics to measure and assess student success should include, at minimum, persistence, completion, return on investment.

To further improve the rigor of this standard, we encourage CPHE to establish acceptable minimum levels of success on these metrics. CPHE should also consider how other agencies establish benchmarks and goals for performance and consider success in the context of institutional peers. CPHE should expect the institutions it accredits to demonstrate improvement on these metrics. For example, the Higher Learning Commission requires that institutions show continuous improvement on metrics and benchmarks in relation to peers. Northwest Commission on Colleges and Universities requires institutions to set goals and improve effectiveness in the context of, and in comparison to, peers. The aspiring Postsecondary Commission requires that institutions demonstrate rates that are at least equal to a peer group of institutions. Establishing minimum baselines of acceptable performance, goals and expectations for continuous improvement, and considering performance in the context of peers establishes a strong approach to ensuring student success.

Finally, expectations of quality and accountability are rapidly changing to consider student success at the program level rather than relying solely on institutional averages. The recently passed *One Big Beautiful Bill Act* sets earnings thresholds at the program level. It also establishes new eligibility for the Pell grant for eligible workforce programs. CPHE has the opportunity to be innovative in its approach to accreditation. Assessing outcomes and establishing expectations at the program level can better target improving success and establish rigorous accountability for students. CPHE should consider evaluating not just individual institutions but assessing student success at the program level.

- b. **Student support services.** CPHE should consider defining what is appropriate student support, given that many grants intended to provide student support at the federal level are being paused or rescinded. Institutions rely on these grants to provide student support services and with funding dwindling, some students may be left without the support they need. CPHE should also consider teaching resources, training, and infrastructure as a necessary part of supporting students.
- c. **Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.** Standards on recruiting and admissions, and advertising are not clearly articulated in CPHE's standards. It is particularly important to establish strong standards here that take into consideration use of third-party entities to ensure students are not subject to misrepresentation, deception, or aggressive practices.
- d. **Other standards: Shared Governance.** We appreciate the inclusion of a standard on shared governance, particularly when states are seeking to undermine the role of shared governance and faculty in decision-making. CPHE should consider clarifying its standard to expressly mention the role of faculty, staff, administrators and students. As an example, see standards by the Higher Learning Commission.
- e. **Other standards: Academic Freedom and Viewpoint Diversity.** We appreciate the inclusion of a standard on academic freedom which is core to the mission and success of any institution. Like shared governance, CPHE should consider specific mention of faculty, staff, administrators, and students. It should consider adding independence that protects its constituencies from inappropriate internal and external influence as a consideration. As an example, see standards by the Northwest Commission on Colleges and Universities.

On the issue of viewpoint diversity, CPHE should remove this concept from its standards or define what it means and how it will be assessed. CPHE has indicated it wants to steer clear of politicization and has categorized consideration of diversity, equity, and inclusion as divisive. It also remains unclear how such a standard would be assessed.

Thank you for the opportunity to comment.

New America Higher Education Policy Program