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November 15, 2024,

Postsecondary Commission staff and board

Re: Public comments on [revised standards published by the Post Secondary Commission](#) in September 2024.

Thank you for the opportunity to comment on the Postsecondary Commission's (PSC) proposed accreditation standards.

The revised standards on which the Post Secondary Commission (PSC) has invited comments are largely the same as their standards published in October 2023. New America previously [provided extensive comments](#) on that iteration of these standards, and we believe that all the questions and concerns we raised in those comments remain and need to be addressed.

There are two substantive revisions in this version of PSC's standards that raise additional concerns about the consistency of PSC's approach to accreditation. PSC's primary focus so far has been on its "value-added" metric, which proposes creating a counterfactual for each student to determine how much a student would have earned if they never attended the institution. PSC's approach assumes that robust and independent data exists to determine the baseline used to measure the value-add a student gains from attending an institution. Only a handful of states have data systems that meet that standard, and as we noted in our original comments, there are still significant problems that PSC has yet to address in that approach. Furthermore, PSC has not made its methodology for its predictive model public, so there is no way to verify its validity or address concerns around bias.

The addition of standards 2.2 and 3.2 provides a significant carve out to PSC's primary approach to determining whether an institution is adding value for students. Allowing institutions to use their own data to determine whether they are succeeding or not departs from that original principle, to allow schools to determine what data to use to say they are meeting the guidelines that PSC sets forth.

Since its inception, PSC has argued that it will be more rigorous than any other accrediting agency. The addition of these new standards appears to undermine that claim. By adding the ability for schools to determine which data to evaluate their own success, PSC is providing a significant loophole to its own approach to accreditation. Given that PSC has said publicly that it wishes to be more rigorous than other accreditors, adding in what amounts to a get-out clause for some schools runs counter to that goal. We would encourage PSC to revise these standards so that any school-determined metrics are thoroughly reviewed and evaluated by PSC staff, and that any data used are longitudinal student-level data. .

Thank you for considering our comments.

Sincerely,

New America Higher Education Policy Team