



UNIVERSITY SENATE

GEORGIA COLLEGE & STATE UNIVERSITY

Executive Committee

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September 8, 2025

Re: Request from the Commission for Public Higher Education for Comments Regarding
Draft Accreditation Standards

To the Commission for Public Higher Education:

On behalf of the University Senate at Georgia College & State University, I would like to express my appreciation for the opportunity to review and comment on the draft accreditation standards. While institutions may be required to consider the Commission for Public Higher Education (CPHE) as an accrediting body, it is essential that any such framework be held to the highest standards of quality, transparency, and accountability. If CPHE is to be recognized alongside established accreditors, such as Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), it must demonstrate that its standards are equally rigorous, comprehensive, and credible. As such, we have put together both answers to the questions specifically requested in the call for comments as well as additional feedback we hope will be considered in your evaluation of the standards.

1. Do the draft CPHE standards fulfill the requirements of U.S. Department of Education regulations?

The CPHE standards broadly align with the categories outlined in 34 CFR §602.16, including student achievement, curricula, faculty, facilities, fiscal capacity, student support services, admissions practices, program length, student complaints, and Title IV compliance. However, the alignment is **surface-level** and lacks the depth and specificity found in recognized agencies like SACSCOC.

SACSCOC meets or exceeds all federal requirements with detailed, well-defined standards and supporting documentation practices, while **CPHE** addresses most categories **in principle**, but several are **underdeveloped or entirely missing**, especially:

- **Recruiting and admissions practices:** CPHE does not explicitly address ethical recruitment, admissions transparency, or catalog accuracy.
- **Grading and academic calendars:** These are not mentioned, though they are required by the Department.
- **Advertising and publications:** No standard addresses institutional marketing or public representation.
- **Substantive change and program expansion:** There is no mention of how institutions should report or manage significant changes.

Recommendation: Include explicit standards or sub-criteria for these areas to ensure full compliance and avoid ambiguity.

Table 1

Comparison to U.S. Department of Education Accreditation Standards

Federal Requirement (34 CFR §602.16)	SACSCOC Coverage	CPHE Coverage	Notes
(i) Student achievement	Explicitly addressed via student learning outcomes, general education, and student success metrics	Addressed via persistence, completion, ROI, societal impact, workforce alignment	CPHE emphasizes outcomes but lacks depth in learning assessment
(ii) Curricula	Detailed standards on program content, rigor, general education, and credit hour requirements	One standard on curriculum appropriateness and rigor	CPHE lacks specificity on general education and curricular coherence
(iii) Faculty	Multiple standards on qualifications, evaluation, development, and academic freedom	One standard on qualifications; one on academic freedom and viewpoint diversity	CPHE omits faculty development and governance roles
(iv) Facilities, equipment, supplies	Covered in physical resources and learning/information resources sections	Covered in standards on facilities and	Comparable coverage

Federal Requirement (34 CFR §602.16)	SACSCOC Coverage	CPHE Coverage	Notes
		scholarly collections	
(v) Fiscal and administrative capacity	Detailed standards on financial audits, planning, and control	One standard on fiscal capacity and cost control	CPHE lacks detail on financial documentation and oversight
(vi) Student support services	Comprehensive standards on support services, staffing, student rights, complaints, and records	One standard on support services; one on complaints	CPHE omits student rights, records, and financial literacy
(vii) Recruiting, admissions, calendars, catalogs, grading, advertising	Explicitly addressed in multiple standards	Not addressed	CPHE is missing this entire category
(viii) Program length and degree objectives	Detailed standards on credit hour minimums and degree rigor	One standard on program length	CPHE lacks specificity and justification requirements
(ix) Student complaints	Detailed procedures and recordkeeping requirements	One standard requiring records upon request	CPHE lacks proactive complaint management standards
(x) Title IV compliance	Embedded in financial standards and explicitly required	Explicitly addressed	Comparable coverage

2. Do the draft standards reflect CPHE's mission and purpose?

CPHE's mission emphasizes academic excellence, student outcomes, efficiency, and public purpose. The standards do reflect these themes, particularly in their focus on outcomes and cost control. However, the **execution is uneven**.

Gaps include:

- **Academic excellence:** There is minimal attention to curriculum design, general education, or faculty development.
- **Efficiency:** While the standards are concise, they lack the operational clarity needed to actually streamline processes.
- **Public purpose:** Only one standard addresses this directly, and it is not well integrated across the framework.

Recommendation: Strengthen the connection between standards and mission by embedding public purpose and academic excellence more consistently across all domains.

3. Are the draft CPHE standards adequate and comprehensive for the assessment of a public college or university?

The standards are **not yet comprehensive**. They omit key areas such as:

- **General education requirements**
- **Faculty governance and development**
- **Assessment of learning outcomes across modalities**
- **Institutional research and planning**
- **Substantive change and innovation oversight**

Moreover, the lack of evidentiary guidance makes it difficult to assess how institutions will demonstrate compliance.

Recommendation: Expand the standards or provide detailed sub-criteria and evidence expectations. Consider adopting a layered model (e.g., core standards + supplemental guidance) to balance simplicity with rigor.

4. How might the clarity of standards be improved through revisions to syntax, word choice, and punctuation?

The draft standards are written in plain language, which is helpful. However, the **overuse of vague qualifiers** like "appropriate," "sufficient," and "best practices" undermines clarity and consistency.

Suggestions for improvement:

- Replace vague terms with measurable criteria or reference benchmarks.
- Use parallel structure across standards to improve readability.
- Clarify whether standards apply institution-wide or program-specific.
- Consider adding examples or annotations to illustrate expectations.

Now that all of the specific questions asked have been addressed, we would also like to provide additional comments based on a comprehensive side-by-side comparison between the current

gold-standard accreditation standards for over 780 institutions of higher education in the region, SACSCOC, starting with a summary of the key differences we see, provided in Table 2.

Table 2

Key differences between SACSCOC standards and the proposed standards for CPHE.

Area	SACSCOC	CPHE
Complexity	Highly detailed, with extensive sub-criteria	Streamlined, with fewer and broader standards
Evidence Requirements	Embedded in standards and guidelines	To be developed separately as evidentiary guidance
Focus on Inputs vs. Outcomes	Mix of input and outcome measures	Strong emphasis on outcomes (e.g., ROI, workforce alignment)
Academic Freedom	Protected as a core value	Explicitly includes viewpoint diversity alongside academic freedom
Governance	Detailed requirements for board structure and independence	Focuses on fiduciary oversight and shared governance
Student Success Metrics	Includes learning outcomes, general education, and support services	Adds return on investment and societal impact as metrics
Title IV Compliance	Embedded in financial standards	Explicitly listed as a standalone standard

We would also like to acknowledge the similarities we observed and appreciated, including the standards for:

- Institutional integrity
- Mission alignment
- Faculty qualifications
- Curriculum rigor
- Student support services
- Facilities and resources
- Governance and leadership
- Compliance with Title IV and federal regulations

However, it is clear to us that if your intent is to be a viable alternative to established accreditation standards, there is more work to be done. Specifically in the following areas:

1. Clarity and Definition of Standards

While CPHE's goal of simplicity is commendable, many standards are currently too broad or vague to ensure consistent interpretation and application. For example, terms like "appropriate," "sufficient," and "best practices" appear frequently without operational definitions or benchmarks. This invites subjectivity and undermines the goal of objectivity.

Recommendation: Provide clearer definitions, examples, and evidentiary expectations either within the standards or through accompanying guidance. SACSCOC's standards are rigorous precisely because they are well-defined and supported by documentation protocols.

2. Depth and Breadth of Standards

The CPHE draft includes only 24 standards, compared to SACSCOC's 109. While fewer standards may reduce administrative burden, they risk omitting critical areas of institutional quality—such as general education requirements, faculty development, governance structures, and academic rigor across modalities.

Recommendation: Consider expanding the number of standards or adding sub-criteria to ensure comprehensive coverage of institutional operations. A streamlined framework should not sacrifice depth.

3. Evidentiary Guidance

The memo indicates that evidentiary guidance will be developed after the standards are finalized. This sequencing limits the ability of stakeholders to evaluate the standards meaningfully and raises concerns about transparency and preparedness.

Recommendation: Release preliminary evidentiary guidance alongside the standards to allow for meaningful feedback and to demonstrate CPHE's commitment to transparency and rigor.

4. Comparative Credibility

If CPHE is to be perceived as a direct competitor to SACSCOC, it must meet or exceed the expectations set by existing accreditors. SACSCOC's reputation is built on decades of peer-reviewed, evidence-based, and mission-aligned standards. CPHE must demonstrate that it can uphold similar levels of quality assurance.

Recommendation: Explicitly align CPHE standards with U.S. Department of Education requirements and provide a crosswalk showing how CPHE standards meet or exceed those of SACSCOC and other recognized agencies.

5. Stakeholder Trust

The rapid development of CPHE standards may raise concerns about long-term viability and stakeholder trust. Institutions need assurance that CPHE will maintain consistency, fairness, and accountability.

Recommendation: Include more detail about the peer review process, evaluator qualifications, and mechanisms for appeals or dispute resolution.

6. Transferability of Credits and Degrees

One critical area not addressed in the draft CPHE standards is the **transferability of academic credits and degrees between institutions accredited by CPHE and those accredited by other recognized agencies**. Without clear standards governing credit evaluation, articulation agreements, and recognition of degrees across accrediting bodies, institutions and students may face significant barriers to mobility. This omission raises concerns about **how CPHE-accredited institutions will be perceived in broader academic and professional contexts**, and whether students will encounter challenges when transferring, applying to graduate programs, or seeking employment. It is essential that CPHE clarify how its accreditation will interface with existing systems to ensure that students are not disadvantaged by institutional participation.

Recommendations: To address these concerns and build trust, we suggest that CPHE

- **Establish formal articulation agreements** with SACSCOC-accredited institutions and other recognized accreditors.
- Publish transfer equivalency guidelines and credit evaluation protocols.
- **Engage in national dialogue** with registrars, admissions officers, and academic affairs leaders to ensure CPHE-accredited coursework is understood and accepted.
- **Provide public-facing assurances** to students and families about transferability and degree recognition.

Given the expectation that institutions may be required to engage with CPHE at some point in the near future, it is imperative that the standards be held to the same level of rigor and transparency as those of established accreditors. The current draft, while attempting to streamline the process, omits or needs to strengthen several critical areas required by the U.S. Department of Education and addressed comprehensively by accreditors like SACSCOC.

If CPHE intends to be recognized as a credible alternative, it must demonstrate that its standards are not only compliant, but also robust enough to ensure institutional quality and public trust. To that end, we respectfully ask:

- How does CPHE intend to address the missing federal requirements related to recruiting, admissions, academic calendars, grading, and advertising?
- What mechanisms will be in place to ensure consistency and fairness in peer review and evaluation?
- How will CPHE define and operationalize vague terms such as “appropriate” and “sufficient” to avoid subjective interpretation?
- Will CPHE provide a crosswalk or mapping to demonstrate how its standards align with or exceed those of existing accreditors?
- When will evidentiary guidance be released, and will stakeholders have input into its development?

We urge CPHE to consider expanding its standards, clarifying its language, and engaging more deeply with institutional stakeholders before finalizing its framework. If institutions are to be evaluated under this model, they must have confidence that it reflects the complexity, breadth, and public mission of higher education.

Thank you for your time and consideration of our comments.

Sincerely,

Stephanie Jett, PhD

Presiding Officer of the University Senate of Georgia College & State University