

To: CPHE Public Comments

From: Georgia College & State University, a unit of the University System of Georgia

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Accreditation is the mechanism that confers an objective layer of legitimacy and value to an institution's degree programs. It assures students, families, employers, and the broader public that the education provided meets established standards of quality and integrity and carries with it what an institution purports to provide – knowledge and skills in a particular discipline. Similar to the role of the Better Business Bureau in fostering trust between businesses and consumers, an accrediting body serves as an impartial entity that promotes transparency, honesty, and fairness between higher education institutions and the public they serve. At its highest level, accreditation functions as a gold-standard arbiter, consistently and objectively ensuring that institutions remain committed to excellence and sound practice and deliver to students the education and expertise in a specific discipline or field that will prepare the student to work in that field and knowledgeably pursue advanced study in that field. It will also inform future employers that the student is, in fact, knowledgeable in a given field of study.

While we are encouraged by the mission and stated goals of the newly proposed accrediting body, Commission for Public Higher Education (CPHE), it remains essential that these promises translate into practice. To earn credibility and trust, CPHE must demonstrate transparency, fairness, independence, and consistency in its standards and operations. Only by adhering to these principles can CPHE position itself as a reliable accreditor that safeguards the value of higher education to the consuming public.

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?

It appears, in our assessment, that all 24 of the CPHE standards align with the U.S. Department of Education's accreditation requirements outlined in §602.16(a)(1)(i–x), *Accreditation and Preaccreditation Standards*, or represent additions permitted under §602.16(f), which allows an agency that applies the standards in paragraph (a) to establish any additional accreditation standards it deems appropriate. However, certain other US DOE requirements also found in Part 602 but outside of Section 16 do not appear to be clearly reflected in the CPHE standards:

1. Substantive Change Monitoring (§602.22)

- DOE requires that accreditors review and approve institutional changes (new campuses, degree levels, contractual arrangements, acquisitions, etc.).

2. Teach-out Plans (§602.24(c))

- Institutions must have plans for student completion if they close a program, location, or the institution itself.

3. **Transfer of Credit (§602.24(e))**
 - DOE requires fair and transparent transfer-of-credit policies.
4. **Credit Hour Definition (§600.2; §602.24(f))**
 - DOE requires accreditors to ensure institutional assignment of credit hours is consistent with the federal definition.
5. **Recruitment & Admissions Practices (§602.16(a)(1)(vii); §668.14)**
 - DOE requires accurate, non-misleading recruitment, admissions, and job placement disclosures.
 - Standards discuss transparency in general, but not specifically about recruitment/advertising/placement.
6. **Default/Loan Repayment, Financial Aid Compliance (§602.16(a)(1)(x))**
 - Accreditors must consider student loan default/repayment performance.
 - Standard 5 mentions “Title IV compliance” but doesn’t specify default/repayment monitoring.
7. **Data Reporting & Public Disclosure (§602.23, §602.27)**
 - Institutions must make available:
 - Transfer-of-credit policies
 - Lists of accreditations/program approvals
 - Completion/graduation rates, placement rates, licensing exam passage rates (where applicable)

2. Do the draft standards reflect CPHE’s mission and purpose? If not, which facets of CPHE’s mission and purpose are missing from the draft standards?

The standards generally reflect the spirit of CPHE’s mission and purpose. However, a clear tension exists between the CPHE memorandum’s stated intent to establish “rigorous, concise, and clear” accreditation standards with “clear guidance” and the draft standards it presents, which are marked somewhat by ambiguity, vagueness, and imprecise language. While “simplicity and clarity” are emphasized as part of CPHE’s mission, we have a concern that the draft standards fall short of those principles. Examples are provided in the table presented along with the answer to question four.

Additionally, the following points have been noted and would benefit from further clarification from CPHE regarding its mission and purpose:

- CPHE’s goal # 1, *Incentivize and recognize academic excellence and institutional stability*, is, on the surface, reasonable and positive, but provides a few reasons to be cautious. First, there is a risk of misaligned incentives. If the incentives are poorly designed, institutions might focus on ‘gaming metrics’ rather than genuinely improving student learning and student success. Also, this introduces equity concerns. What will the rewards (incentives) tied to “excellence” or “stability” look like? Will larger, more resource-rich institutions disproportionately benefit? This leads to a third concern, which is definitional ambiguity. What will be the expectations and/or requirements for

“academic excellence” and “institutional stability”? Without clear definitions, institutions won’t know what is expected, and reviewers might apply the criteria inconsistently.

- Goal Three, which emphasizes focusing on student outcomes rather than inputs, will ideally be accompanied by additional guidance from CPHE. While this focus is laudable in principle, without further direction, it could inadvertently encourage a “teaching to the test” approach and risk neglecting critical inputs that are essential to meaningful educational quality.
- Under Core Principle Four, the concept of “accountability to the states” of member institutions prompts important questions regarding how CPHE will ensure that its reviews are conducted in a consistently unbiased, impartial, and equitable manner by reviewers free from conflicts of interest or personal and/or professional bias. Additionally, the hallmark of accreditors over the past century has been their independence and their ability to assure the consuming public (students, families, employers, etc.) that no influence beyond an institution’s ability to deliver a top-quality education is at work in its operations. Further clarification on what “accountability to the states” means will be needed to assure that the stamp of accreditation carries the same level of independence and objectivity the public has always depended upon.
- Operational Assumption #3 appears to suggest that little guidance will be provided regarding the standards themselves. It is unclear what is meant by “evidentiary guidance,” and it remains uncertain whether CPHE will offer concrete suggestions on the documentation institutions should submit for each standard.
- Core Principle Three appears to promise reduced tuition rates in all educational settings, resulting from a more efficient and focused accreditation process under CPHE. This claim warrants caution, as it may be over-reaching and unrealistic without further supporting context and resource allocation.
- Additional information is needed regarding CPHE’s processes for reviewing institutions and making accreditation decisions. Specifically, it would be helpful to understand the criteria for evaluation, the evidence institutions are expected to provide, the roles and qualifications of reviewers/evaluators, timelines, and how final decisions are determined and communicated. A longstanding hallmark of accreditors has been the independent peer reviewer, with no peer reviewers allowed from within the same state as the institution under review so as to minimize any conflicts of interest. No guidance is included on the review process in the CPHE standards.
- Regarding the discussion of recurring adjectives in the CPHE standards, the statement that they “may invite some subjectivity and/or questions regarding degree” raises concern. Introducing subjectivity seems counter to the goal of maintaining clear, objective, and consistent standards. Further clarification is needed on how CPHE intends to minimize ambiguity and ensure uniform and consistent interpretation and implementation across institutions and reviewers.

3. Are the draft CPHE standards adequate and comprehensive for the assessment of a public college or university? Which facets of public colleges and universities may not be anticipated

by the draft standards? How might evidentiary guidance improve adequacy and comprehensiveness?

Some of the standards are fairly strong and address many critical areas of institutional quality and accountability. However, whether they are fully “adequate and comprehensive” for a university depends on the level of detail and measurability expected of the standards. The term “adequate” itself is open to interpretation, and upon review of the first draft, several potential gaps are apparent. For example, while Standard 19 references metrics related to student success, it does not explicitly require systematic assessment of student learning outcomes or the use of data to improve teaching and learning. There is also limited discussion of faculty sufficiency, preparation, or expectations across different levels of tenure. Additionally, the standards make no explicit reference to online learning, IT systems, cybersecurity, or emerging educational technologies. Whether considered individually or collectively, the standards also do not sufficiently define the principles of institutional effectiveness or clearly address an institution’s commitment to these underlying principles.

Standard 16, which requires that an “institution’s policies and practices support diversity of viewpoints of its faculty and students in academic and co-curricular life,” is an example of a standard for which evidentiary guidance would greatly improve adequacy, comprehensiveness, and eventual compliance. Please take this comment seriously: Without guidance and clarity, universities will struggle to comply with this standard.

Is this standard to be met through hiring or admissions policies? Since hiring and admissions processes in the state of Georgia mandate that all admissions and hiring processes and decisions be free of ideological tests, affirmations, and oaths, including diversity statements, how would an institution go about writing policy and implementing practices that make these guarantees?

Does the standard require a formula of 50/50 viewpoints in all disciplines, even among the sciences, where viewpoints on some matters have been scientifically disproven? If it requires an equal balance of viewpoints among social science faculty, how will a university test for viewpoints in the hiring process, and must an otherwise qualified candidate be rejected to meet a specified balance of viewpoints on a campus? Does the mere establishment of a standard requiring viewpoint diversity encourage faculty to introduce a personal “viewpoint” into a course, i.e., indoctrination, that should be taught pursuant to a syllabus with a singular focus on the course content?

If the objective of Standard 16 is to assure that all viewpoints of faculty, staff, and students can be expressed on a campus, then Georgia’s “free expression” policies might be a preferred model rather than a standard of “viewpoint diversity” that seems quite difficult to quantify or document in any consistent form. In any event, evidentiary guidance or further clarification on how universities will document compliance is much needed here.

Throughout the standards, evidentiary guidance would enhance the adequacy and comprehensiveness of the standards in many ways and aid in their assessment. Clear guidance on the standards and evidence provided would clarify expectations and help institutions understand what is expected per standard, thus promoting consistent implementation. Evidentiary guidance would also support and bolster measurability and accountability and help institutions demonstrate compliance. Finally, evidentiary guidance would be crucial in reducing subjectivity during the review process, a hallmark and key characteristic of effective accreditation.

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

Three tenets must guide the writing and interpretation of standards: clarity, conciseness, and assessability. Standards that embody these qualities reduce unnecessary burdens on institutions related to interpretation, documentation, and demonstrating compliance. Conversely, standards that lack clarity, conciseness, or assessability can lead to inconsistent application and confusion regarding the accrediting body's expectations. It is essential that institutions, accreditors, and the public interpret standards consistently—a cornerstone of sound accreditation. However, many of the 24 CPHE standards contain ambiguity and vagueness that could hinder uniform application across institutions. We have a shared responsibility to ensure that the CPHE standards uphold these principles of clarity, conciseness, and assessability.

Effective adjustments could include:

- Use plain, direct language and avoid equivocal phrasing (e.g., “all...shall understand”, “must comply”).
- Replace abstract concepts (e.g., “furthers the common good”, “well-being of the public”, “diversity of viewpoint”, “appropriate intervals”, “appropriate number”) with observable and measurable expectations.
- Make sure each standard covers one idea only (standards 4, 9, 10, 20)
- Shorten multi-part standards (e.g., Standard 9, Institutional Effectiveness; 20, Student Support Services; 21, Fiscal and Administrative Capacity).
- Cut qualifiers that weaken enforceability (e.g., “as appropriate” appears often and could be replaced with clearer thresholds).
- Phrase standards so compliance is demonstrable with evidence available from institutions (policies, reports, data, etc.).
- Replace subjective language (“sound fiduciary oversight”, “furthers the common good”) with measurable criteria.
- Use verbs that imply observable action: *documents, demonstrates, maintains, evaluates, publishes, reviews*.

Suggested example revisions to select CPHE standards to account for **clarity, conciseness, and assessability**:

CPHE Standard Section Title	CPHE Standard	Current version	Suggested re-write	Notes
Integrity, Transparency, and Compliance	1	The institution demonstrates integrity across its organization and its activities.	The institution demonstrates integrity through ethical policies, practices, and decision-making.	
Continuous Improvement	9	The institution enacts processes for continuous improvement across its organization and activities, assessing outcomes versus goals, applying lessons learned to the improvement of policies and actions, and then repeating this cycle at appropriate intervals.	The institution conducts a systematic and documented cycle of assessment and continuous improvement across academic, student support, and administrative units. This process entails establishing goals, evaluating outcomes, applying findings to enhance effectiveness, and sustaining the cycle on an ongoing basis.	
Governance and Leadership	10	The institution's governance structures and practices—	The institution's governance bodies provide sound fiduciary oversight including financial stewardship,	It may be necessary to introduce a new standard focused on “sound executive management,” encompassing principles

		both at the system level and at the institutional level, as applicable—demonstrate sound fiduciary oversight and sound executive management.	accountability, compliance, risk management, and integrity in decision-making. (Part 1)	such as strategic leadership, operational effectiveness, accountability and transparency, and practices that advance the institution’s mission. These are substantial concepts that may be too broad to address adequately within a single standard.
Mission and Public Purpose	12	The institution fulfills an appropriate mission.	Each institution defines and fulfills its stated mission under its own governing principles and demonstrates that its operations and outcomes are consistent with and supportive of that mission.	“Appropriate mission” is very subjective, vague, and ambiguous.
Mission and Public Purpose	13	The institution, as a public entity, furthers the common good and the well-being of the public.	The institution demonstrates contributions to the public good through teaching, research, service, and community engagement and/or contributions.	Without further clarity, the concepts of furthering the public good and the well-being of the public are vague and can differ greatly between an institution’s understanding and that of evaluators.
Faculty	14	The institution employs faculty of appropriate number and qualifications to support academic programs.	The institution employs a sufficient number of qualified faculty with appropriate credentials, expertise, and experience to ensure the quality and effectiveness of its academic programs.	The concepts of faculty quality, preparation, rank, role, responsibilities, and subject-matter expertise are not clearly defined. Is each institution expected to determine independently what constitutes appropriate faculty qualifications?

Academic Freedom and Viewpoint Diversity	15	The institution's policies and practices support the academic freedom of its faculty.	The institution protects academic freedom in teaching, research, and publication.	
Academic Freedom and Viewpoint Diversity	16	The institution's policies and practices support diversity of viewpoints of its faculty and students in academic and co-curricular life.	The institution will have policies and practices that support and protect the freedom of expression rights of students, faculty, and staff.	The standard is notable in principle, yet complicated because it introduces subjective definitions, legal and ethical boundaries, resource constraints, and cultural and political pressures. See further comment in response to Question 3, above.