



MEMORANDUM

TO: Chancellor of the University System of Georgia Dr. Sonny Perdue

FROM: Commission for Public Higher Education

DATE: Tuesday, August 19, 2025

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

As you know, the Commission for Public Higher Education (CPHE) is a new accrediting agency that will seek recognition from the U.S. Department of Education in order to accredit (and thereby offer access to Title IV funds for) public colleges and universities.

CPHE seeks comments regarding its draft accreditation standards, which are attached along with an explanatory memo. This opportunity for comments is open to CPHE stakeholders and to all members of the general public. Comments from institutional or system stakeholders of course will not obligate an institution to join CPHE at a later date.

In general, CPHE's intent in authoring draft accreditation standards is to create rigorous, concise, and clear guidance while adhering to Department of Education regulations. Other background regarding intent is outlined in the explanatory memo that precedes the text of the draft standards themselves.

CPHE requests comments addressed to contact@cphe.org by close of business on Tuesday, September 16.

CPHE welcomes your circulating this memo to the following University System of Georgia audiences and to any other audiences as you see fit:

- Board of Regents and any relevant advisory board(s)
- Institutional Presidents and Deans
- Vice presidents, executive team, and/or cabinet
- Faculty Council
- Staff Council
- Student Advisory Council

CPHE welcomes suggestions as to other state and national groups that should receive an invitation to submit comments.

Thank you for your attention to this matter. The chief executive of the five other university systems that founded CPHE are receiving similar requests today.

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COMMISSION FOR PUBLIC HIGHER EDUCATION REQUEST FOR COMMENTS REGARDING DRAFT ACCREDITATION STANDARDS

Request for Comments

The Commission for Public Higher Education (CPHE) is a new accrediting agency that will seek recognition from the U.S. Department of Education in order to accredit (and thereby offer access to Title IV funds for) public colleges and universities.

CPHE seeks comments from stakeholders and members of the general public regarding CPHE's draft accreditation standards, which are attached. This explanatory memo is intended to inform those who will read the draft standards and who may want to supply comments.

Please submit comments to contact@cphe.org by close of business on Tuesday, September 16.

CPHE's Mission and Core Principles

CPHE is a consortium of higher education systems from several states offering a new accreditation model that will focus on academic excellence, student outcomes, process efficiency, and the pursuit of quality assurance for public postsecondary education.

CPHE's mission is to advance the quality and improvement of higher education by accrediting and pre-accrediting state public colleges and universities that are incorporated, chartered, licensed, or authorized in the United States. By establishing rigorous, transparent, and adaptable outcomes-based accreditation standards and practices, CPHE will ensure that colleges and universities meet and maintain academic quality and operational excellence on behalf of their students.

In advancing its mission, CPHE is guided by the following core principles:

- It is appropriate and necessary to introduce competition, aligned with state and institutional needs, into the existing marketplace of university accreditation;
- It is in the best interests of all interested parties, including students, to launch an accrediting body comprised of true peer institutions focused on public colleges and universities and their governing university systems;

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- It is imperative to reduce bureaucracy through a more efficient and focused accreditation process, which will result in lower costs and significant time savings for member institutions, and which will translate into lower tuition prices for students and families;
- It is critical to ensure that this new accrediting body is accountable to the states of the member institutions; and
- It is necessary for the new accrediting body to become and remain recognized by the U.S. Department of Education for the purposes of Title IV participation by its accredited institutions.

U.S Department of Education Regulations Regarding Accreditation Standards
U.S. Department of Education Regulations list categories of standards that any recognized accrediting agency must implement:

- (i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of State licensing examinations, course completion, and job placement rates.*
- (ii) Curricula.*
- (iii) Faculty.*
- (iv) Facilities, equipment, and supplies.*
- (v) Fiscal and administrative capacity as appropriate to the specified scale of operations.*
- (vi) Student support services.*
- (vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.*
- (viii) Measures of program length and the objectives of the degrees or credentials offered.*
- (ix) Record of student complaints received by, or available to, the agency.*
- (x) Record of compliance with the institution's program responsibilities under title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency. . . .*

Other sections of Department of Education regulations permit agencies to implement accreditation standards in addition to the above required standards.

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Accrediting Agencies' Standards

Standards, sub-standards, and criteria employed by U.S. accrediting agencies are linked below:

- [Higher Learning Commission](#)
- [Middle States Commission on Higher Education](#)
- [New England Commission of Higher Education](#)
- [Northwest Commission on Colleges and Universities](#)
- [Postsecondary Commission](#) (not yet recognized by the U.S. Department of Education)
- [Southern Association of Colleges and Schools Commission on Colleges](#)
- [Western Association of Schools and Colleges Senior College and University Commission](#)

The number of standards and sub-standards employed across accrediting agencies varies greatly:

Agency	Number of Standards and Sub-standards
CPHE *	24
HLC	21
MSCHE	122
NECHE	191
NWCCU	50
PC **	44
SACSCOC	109
WASC SCUC	41

* Draft CPHE standards as of August 19, 2025.

** Postsecondary Commission is not yet recognized by the U.S. Department of Education.

Agencies' standards are reviewed periodically by the National Advisory Committee on Institutional Quality and Integrity (a body that recommends action to the U.S. Department of Education regarding accrediting agencies) and the Department of Education itself.

CPHE's Goals for Its Accreditation Standards

CPHE accreditation standards should reflect CPHE's mission and goals. That is, CPHE intends to create accreditation standards that will further CPHE's purpose:

1. Incentivize and recognize academic excellence and institutional stability.

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2. Highlight the public purpose of public colleges and universities.
3. Focus on student outcomes rather than on inputs as indicators of excellence.
4. Streamline accreditation processes through process simplification, efficiency, and clarity.

Otherwise, small groups of institutional and system stakeholders, along with experts staffing CPHE, developed the following operational assumptions regarding the attached draft standards after reviewing Department of Education regulations and other accrediting agencies' standards:

1. A smaller number of standards will be preferred over a larger number of standards, so long as those standards meet Department of Education requirements and any other requirements deemed necessary.
2. CPHE standards will benefit from simplicity and clarity. At issue are the operational definitions of terms and phrases within any single standard—along with sentence structures (especially use of conjunctions) and the applicability of any single standard across multiple programs or units within an institution. With increasing complexity, an individual standard likely contains an increasing number of concepts that an institution must address with specific, separate evidence.
3. Evidentiary guidance is better supplied through accompanying recommendations rather than within standards themselves. (See more regarding evidentiary guidance, below.)
4. Objectivity must be maximized, and overreliance on adjectives and adverbs may invite subjectivity and/or questions regarding degree. Draft CPHE standards therefore minimize use of adjectives and adverbs. Recurring adjectives in the draft CPHE standards include, for example, “appropriate” and “sufficient.” These adjectives may invite some subjectivity and/or questions regarding degree but may nevertheless lend themselves to use of a “reasonable person” standard.

Organization of the Draft CPHE Standards

The attached draft CPHE standards are organized so as to begin with notions that take precedence over others and/or that apply to an entire institution and its activities. Generally, the standards that follow are listed in order according to primacy and sometimes similarity.

Evidentiary Guidance

CPHE will develop evidentiary guidance regarding accreditation standards once those standards are finalized during the Fall of 2025. Guidance will likely take the form of

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suggested, recommended, and/or required items that an institution may cite in order to demonstrate compliance with a standard.

How CPHE Will Consider Comments and Then Finalize Standards

CPHE will collect comments regarding the attached draft accreditation standards through close of business on Tuesday, September 16. Thereafter, CPHE will analyze comments toward authoring a revised draft of standards.

The CPHE Standards and Procedures Working Group, a collection of approximately 30 experts regarding institutional accreditation, will then offer advice regarding those revised draft standards. CPHE will then develop final draft standards, based on feedback from the Working Group. Those final draft revisions will be evaluated by the CPHE Board of Directors.

Once approved by the CPHE Board of Directors, CPHE accreditation standards will shape accrediting activity of an initial cohort of approximately 10 institutions of higher education to be assessed by peer evaluators, beginning in the Fall of 2025.

Lessons learned from the process of accrediting the first CPHE cohort of colleges and universities likely will be applied to new revisions to CPHE accreditation standards during 2026. CPHE expects to request comments regarding those second-edition standards.

Optimal Comments

CPHE stakeholders and members of the general public may benefit from review of U.S. Department of Education regulations, along with some cursory review of other agencies' accreditation standards, before evaluating the attached draft CPHE standards.

CPHE will accept constructive comments of all sorts; however, comments in response to the following questions will be especially valuable:

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

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and universities may not be anticipated by the draft standards? How might evidentiary guidance improve adequacy and comprehensiveness?

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



COMMISSION FOR PUBLIC HIGHER EDUCATION
DRAFT ACCREDITATION STANDARDS

Integrity, Transparency, and Compliance

1. The institution demonstrates integrity across its organization and its activities.
2. The institution is transparent in its policies and practices.
3. The institution publishes accurate information regarding its policies and practices.
4. The institution complies with federal and state regulations. (In the event that the Commission's standards conflict with state law, all parties shall understand state law to take precedence.)
5. The institution documents its compliance with Title IV of the Higher Education Act, as required by federal regulations.
6. The institution complies with its own policies and governing documents.
7. The institution employs conflict-of-interest policies and requires regular declarations regarding conflicts of interest from appropriate personnel.
8. The institution reports incidents of non-compliance with these standards to the Commission for Public Higher Education, upon receipt of reasonable evidence of such non-compliance.

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.

Governance and Leadership

10. The institution's governance structures and practices—both at the system level and at the institutional level, as applicable—demonstrate sound fiduciary oversight and sound executive management.
11. Institutional decision-making is characterized by shared governance in appropriate processes and as documented in appropriate policies.

Mission and Public Purpose

12. The institution fulfills an appropriate mission.
13. The institution, as a public entity, furthers the common good and the well-being of the public.

Faculty

14. The institution employs faculty of appropriate number and qualifications to support academic programs.

Academic Freedom and Viewpoint Diversity

15. The institution's policies and practices support the academic freedom of its faculty.
16. The institution's policies and practices support diversity of viewpoints of its faculty and students in academic and co-curricular life.

Curricula

17. Institutional curricula are appropriate to mission and designed with rigor appropriate to degree level and/or credentialing requirements.

Measures of Program Length

18. Institutional program lengths are appropriate to degree level and/or credentialing requirements.

Student Success and Student Support Services

19. The institution employs best practices to measure and improve student success as assessed by varied methods. At minimum, metrics should include rates of persistence and completion, return on investment, societal impact, and alignment with workforce needs.
20. The institution provides student support services of appropriate variety and scope, as appropriate to the institution's student population, for both academic and co-curricular purposes.

Fiscal and Administrative Capacity

21. The institution maintains fiscal and administrative capacity sufficient to fulfill its mission while controlling costs that otherwise may increase tuition prices charged to students.

Facilities and Other Resources

22. The institution maintains facilities, equipment, supplies, and infrastructure sufficient to fulfill its mission.
23. The institution maintains scholarly collections, materials, and tools sufficient to fulfill its mission.

Records of Student Complaints

24. Upon the Commission for Public Higher Education's request, the institution will supply records of student complaints and will demonstrate adherence to regulations, policies, and practices for management of student complaints.