



November 15, 2022

Mr. Chris Burt
University Business
360 Hiatt Drive
Palm Beach Gardens, FL 33418

Dear Mr. Burt,

In response to the article "Rating Accreditors" you wrote on October 6, 2022 in the publication **UniversityBusiness.com**, I write to provide some feedback and alternative perspectives to your conclusions regarding the effectiveness of the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) as an accreditor.

The facts demonstrate that SACSCOC institutions' academic and student achievement performance continues to remain in line with, or slightly exceed, those of other former regional accreditors. In fact, this is true across a variety of different measures. However, in September 2022, the Texas Public Policy Foundation (TPPF) released a report that asserted that the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) is the "worst" former regional institutional accreditor and the Higher Learning Commission (HLC) is the "best" institutional accreditor. I believe that this assertion reflects a flawed conclusion based on a flawed study.

Concerns Regarding TPPF's Study:

- Many states, including Texas, clearly recognize that the quality of higher education cannot be reduced to a single measure and require institutions to report on multiple performance indicators. Thus, the TPPF's focus on a single measure to evaluate a regional institutional accreditor, while simultaneously collapsing college performance to the same metric, does not represent the comprehensive, accountability emphasis required by most states and, indeed, by accreditors themselves.
- There is no theoretical framework articulated in the TPPF study to validate their approach, nor are there any findings from peer-reviewed research that convincingly support or justify the choice of the debt/earning metric as a single and sole indicator of accreditor performance from the large number of other higher education quality measures available. This is critical since the peer-reviewed research on student achievement consistently identify multiple variables (as well as a range of contextual factors) that inform any attempt to assess value, quality, and institutional impact on students during and after their matriculation.
- Former regional accreditors assess performance of member institutions holistically – from the institution-level perspective – and use a variety of indicators to conduct their evaluations. The TPPF analysis is based solely on program-level debt and earnings data. Ergo, the TPPF conclusions are based on one program-level factor, while institutional accreditors conduct their reviews based on a multitude of institution-level measures when accrediting an institution as a whole.



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- The College Scorecard data, while enormously helpful in many areas, is replete with missing data. The TPPF acknowledges this and claims that its analysis is, nonetheless, based on a representative subset of the data. However, no evidence is provided to support this claim. TPPF's conclusions appear to be made on thoroughly incomplete data.
- A significant majority of undergraduate students enrolled in institutions accredited by former regionals do NOT borrow federal student loans. For example, in the SACSCOC region, only 38% of undergraduate students receive federal loans. Thus, the TPPF's conclusions are based on a metric that is applicable to a minority of students.

As we analyze the data, we believe the following to represent the facts:

- At the institutional level, SACSCOC performs on par with other former regional accreditors on the debt as a percent of earnings metric. In fact, SACSCOC slightly outperforms HLC on that measure for four out of five credential levels, including Associate and Baccalaureate.
- Similarly, in contrast to the TPPF conclusions, institution-level data on an additional measure – net price as a percent of earnings ratio – indicate that SACSCOC member institutions perform at slightly higher levels than schools accredited by other similar former regionals such as HLC and MSCHE.
- In other words, graduates of SACSCOC member institutions receive a higher return on their higher education investments than students graduating from institutions accredited by most similar associations.

SACSCOC continues to work to improve higher education for the benefit of society and welcomes feedback from all interested parties. However, I believe the TPPF report includes inaccurate information and, therefore, in no way captures the progress that SACSCOC member institutions continue to make in student achievement; nor does it provide useful critiques that can be used to further drive student achievement.

These are selected highlights of the facts concerning SACSCOC performance, and the numerous conceptual and methodological issues believed to be contained within the TPPF report. I have included our entire analysis for your information. If you would like to discuss this further, please feel free to contact me or Dr. Alexei Matveev, Director of Research and Training at SACSCOC.

Sincerely,

Belle S. Wheelan, Ph.D.
President

Enclosure

cc: Members of the Executive Council of the SACSCOC Board of Trustees
SACSCOC Staff