Rating of Accreditors by Texas Public Policy Foundation and UniversityBusiness.com: *Flawed Study Leads to Flawed Assertions*

Summary Points

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. Despite these facts, in September 2022, the Texas Public Policy Foundation (TPPF) released a report that wrongly 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. First, we commend the HLC for the work it continues to do in supporting student achievement at its institutions. Second the assertion that SACSCOC is the "worst" former regional accreditor is an erroneous one resulting from serious conceptual and methodological flaws in TPPF's study. The data on the matter are clear and consistent, and much of it is presented below.

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, institutional-level data on an additional measure – net price as a percent of earnings ratio – indicate that SACSCOC member institutions perform at higher levels than schools accredited by other similar former regionals.
- In other words, graduates of SACSCOC member institutions receive a slightly higher return on their higher education investments than students graduating from institutions accredited by most similar associations such as HLC and MSCHE.

Key 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. In addition, higher education research consistently identifies multiple factors that impact student achievement. 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, higher education research 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.
- 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 metric that is applicable to a minority of students.

These are selected highlights of the facts concerning SACSCOC performance, and the numerous flaws contained within the TPPF report. The full response below provides additional information. SACSCOC continues to work to improve higher education for the benefit of society and welcomes feedback from all stakeholders. The TPPF report is inaccurate, flawed and 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.

I. Introduction

In September 2022, the Texas Public Policy Foundation (TPPF) released a report that declared the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) to be the "worst" former regional institutional accreditor and the Higher Learning Commission (HLC) to be the "best" institutional accreditor. This assertion was based on a descriptive review of incomplete data for a single, program-level metric that is inapplicable for a vast majority of students enrolled in SACSCOC member institutions. Further, the TPPF report recommended that institutions currently accredited by SACSCOC should seek membership with "high performing accreditors" such as the HLC.

In October 2022, UniversityBusiness.com published a follow-up article that amplified the inaccurate claims made in the TPPF report. The article further advanced the idea of rating or ranking institutional accreditors based on the findings from the TPPF report.

Both the TPPF report and the associated UniversityBusiness.com article should be commended for using new federal data sets and for drawing attention to the critically important topics of student borrowing and the personal value of higher education in terms of post-graduation earnings. However, we observed that the TPPF report was limited in numerous conceptual and methodological ways. These issues include, but are not limited to, not being grounded in a solid conceptual framework, not being sufficiently credible in the analysis, and, thus, being erroneous in conclusions.

In addition, contrary to the TPPF claims, our analysis of *institution*-level data demonstrates that although, on one hand, SACSCOC has the highest share of student from lower socio-economic backgrounds among the former regionals and, on the other hand, SACSCOC operates in the states with the lowest personal income, **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, institutional-level data on an additional measure of economic return on college education investment – net price as a percent of earnings ratio – indicate that SACSCOC institutions perform at higher levels than schools accredited by other similar former regionals. Facts such as these contradict TPPF conclusions.

II. Selected Key Observations

Neither the TPPF nor UniversityBusiness.com sought pre-release feedback from the subject of their publications -- institutional accreditors. Seeking feedback from the subject of publications is a common professional practice. Thus, this response will outline twelve general observations to help the reader interpret claims made in the TPPF report and UniversityBusiness.com article in a more comprehensive context. These observations require further research on this topic which will result in a more informed, constructive, and collective discussion of the key issues that impact student borrowing and graduate earnings, and will contribute to the development of more effective student achievement strategies.

1. Reductionist Perspective

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. Similarly, SACSCOC reviews institutional inputs, processes, outputs, and outcomes in more than 70 areas. Likewise, individual colleges and universities acutely recognize this complexity and apply multiple metrics in order to monitor and evaluate their own performance. For example, in the SACSCOC region, institutions use, on average, six different measures in their responses just to one standard related to student achievement outcomes (CR 8.1). Even the much-criticized USNWR ranking uses a wide range of variables in their analysis.

In contrast, the TPPF report and UniversityBusiness.com article employ a narrow perspective and inexplicably utilize a single metric as a sole measure to evaluate and rate performance of institutional accreditors. **Reducing complex operations of higher education institutions to a single metric and rating the overall quality of an institutional accreditor based on information from that single measure is an inappropriate and erroneous oversimplification.**

2. Arbitrary Choice of the Rating Metric and Performance Benchmarks

Further, the validity of the programmatic debt-to-earnings ratio metric as a sole indicator of the overall quality of the formerly regional accreditors has not been firmly established. Although the TPPF self-references two other previously published TPPF reports, neither a theoretical framework guiding the study nor findings from peer-reviewed research were provided to convincingly support or **justify the choice of the debt/earning metric as a single and sole indicator of accreditor performance from a large number of available higher education quality measures**.

In addition, the TPPF report does not provide sufficient research-based support for the validity of the cutoff benchmarks that were set to define performance categories and, then, used to rate institutional accreditors. For example, in our analysis (see Exhibit 1 in section4), when the debt to earnings ratio analysis is conducted at the institutional level, all former regional accredits fall in the TPPF's "reward" category for Associate and Baccalaureate degrees, none of accreditors falls in the "sanction" bracket for any credential level, and all accreditors fall in the "sunset" category for professional degrees. Such a pattern of performance distribution strongly suggests that **the cutoffs identified by the TPFF need to be adjusted by following commonly-accepted good practices in standard setting**. This fact is another example of TPPF flawed methodology and erroneous conclusions.

3. Widespread Instances of Missing Data

There is a substantial amount of missing (null or empty) values in the current College Scorecard dataset for earnings and, especially, debt variables at the individual program level. In fact, one of the previously published TPPF reports directly acknowledged the missing data by indicating that the debt/earnings analysis is based only on approximately 34,000 program records (that both have debt and earnings data) out of about 300,000 total program records contained in the College Scorecard data set. However, the current report did not acknowledge the extent of the missing data and neither of the reports provided methodological notes on how the data were processed in general and how missing values were handled specifically. Further, that previously published TPPF report asserted that these 34,000 program records (or 11% of all records) account for 80% of all bachelor's degree graduates. However, no immediate evidentiary support for this claim was found. For example, one of the institutions we reviewed has 49 programs, but only three (3) or just 6% have both debt and earnings data and these three programs account for 16% of the institution's graduates.

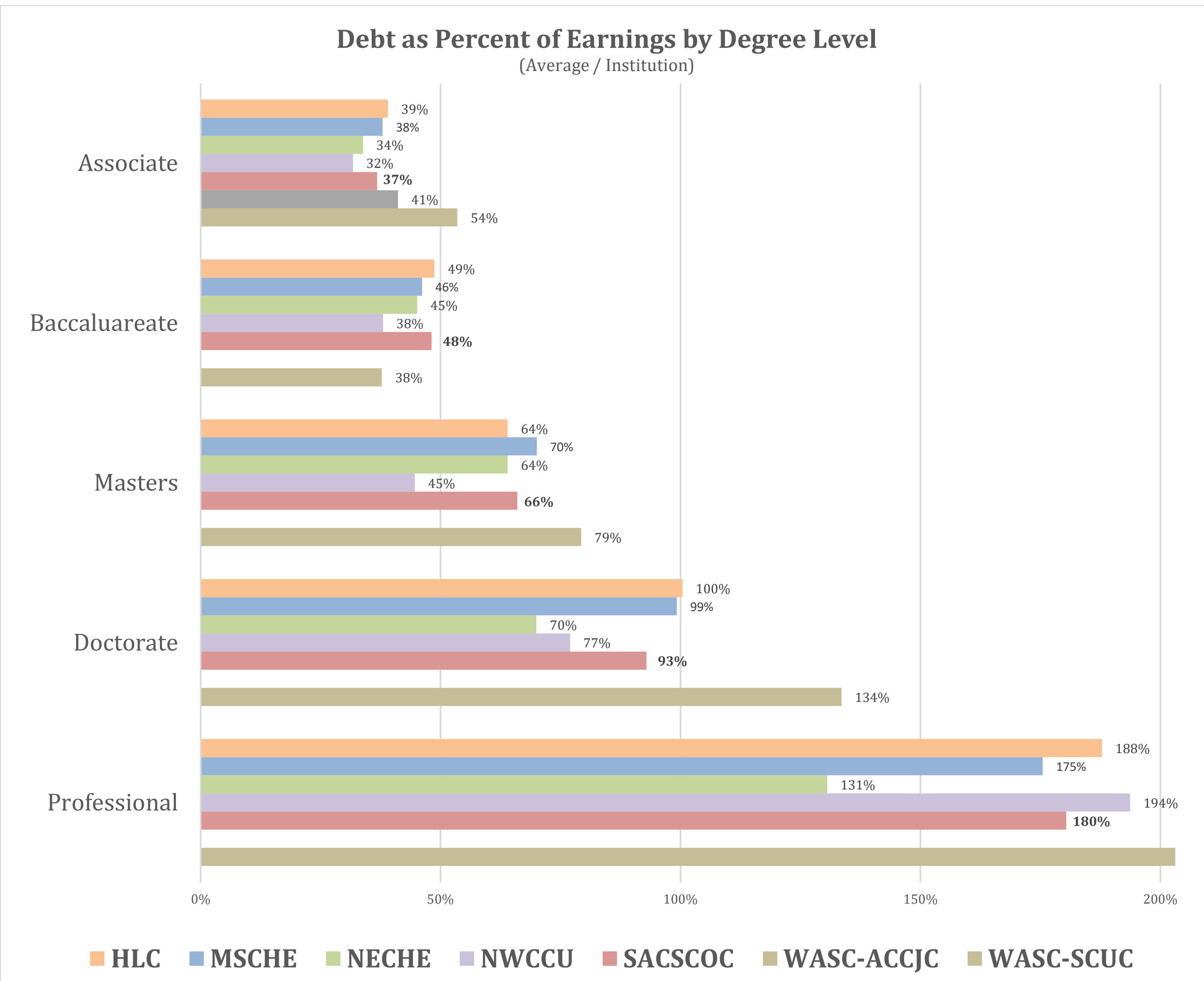
In other words, the **conclusions and recommendations made in the TPPF report are based on information from just 11% of total program records in the College Scorecard dataset.** Without a clear understanding of the methodology for data processing, any conclusions and recommendations made on the analysis of a data set with widespread missing values are likely to have limited credibility, and, thus, should be interpreted with great caution.

4. **Inappropriate Level of Analysis**

The TPPF report is based on the analysis of program-level data; however, conclusions are made about institutional accreditors. The recommendations focus on the program level interventions, but such functions are generally beyond the scope of institution-level accreditation. In the context of institutional accreditors, debt and earnings should be, primarily, examined at the institutional, not program, level since former regionals base their reviews on holistic, institution-level evaluations.

In fact, when the debt as a percent of earnings metric is examined through the *institutional* lens or at the level at which former regional accreditors operate, a pattern that is substantively different from (and, in many instances, contradictory to) the one presented in the TPPF report emerges. Specifically, as Exhibit 1 shows, **rather than being "the worst regional accreditor," SACSCOC performs on par with other similar former regional accreditors**. Actually, SACSCOC slightly outperforms (i.e., has a smaller ratio) the HLC (identified by the TPPF as the "best" accreditor) on that measure for four out of five credential levels, including Associate and Baccalaureate.

*Exhibit 1***.**



Debt: Weighted average median completer borrower debt // *Earnings*: Weighted average median completer earnings
Data Source: DoEd / NACIQI Accreditor Data File (July 2022)
https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx

5. Limited Scope of the Rating Metric

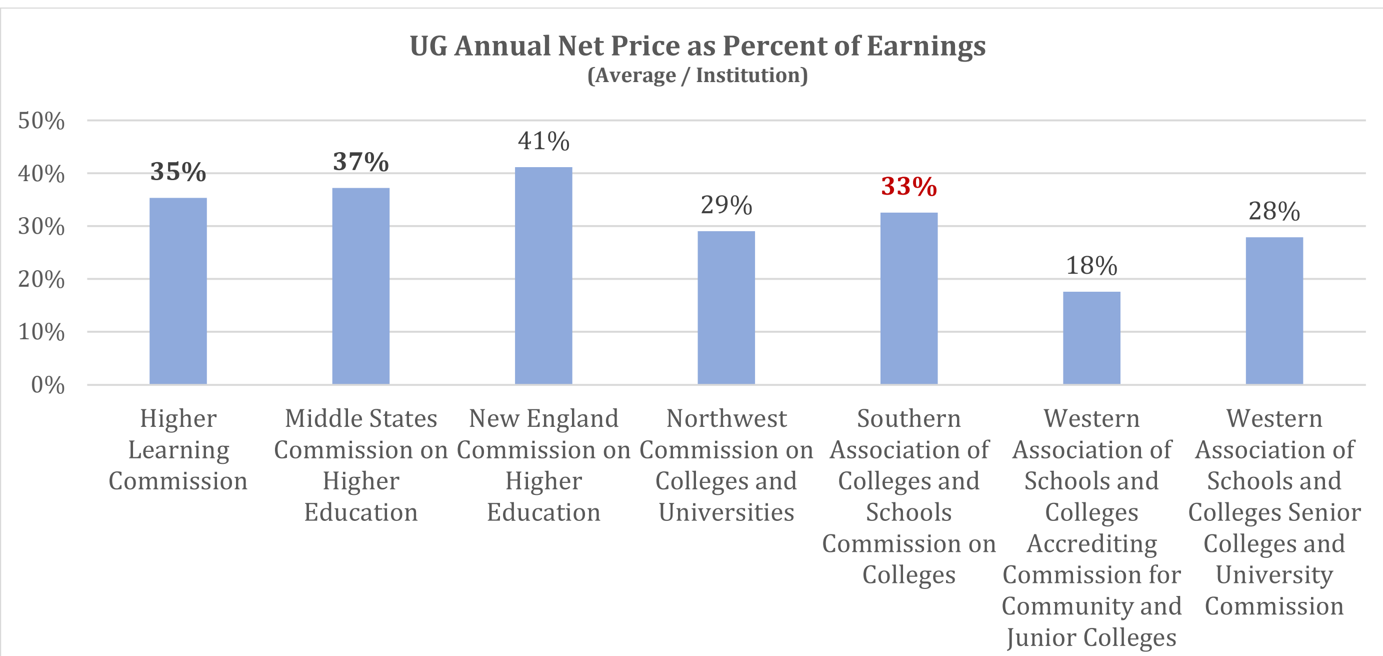
Extensive instances of missing or null data in the College Scorecard dataset are likely to reflect, in part, the fact that a significant majority of undergraduate students enrolled in institutions accredited by former regionals do NOT borrow federal student loans. For example, in the SACSCOC region, only 38% of undergraduate students receive federal loans [2022 NACIQI Accreditor Data File - https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx]. In other words, on average, **the TPPF rating metric is not applicable to almost two-thirds of undergraduates enrolled at SACSCOC member institutions.** This critical fact is not included for context in the TPPF report. Thus, any generalizations about the SACSCOC quality made based on the information yielded from that metric will have limited credibility.

Further, only a quarter (26%) of undergraduate students in the NWCCU region receive federal loans and only 1% of students enrolled in the WASC-ACCJC-accredited schools receive federal loans. It is simply incomprehensible how the TPPF report could make any generalizations about the WASC-ACCJC's overall quality drawing on a measure that provides information on just 1% of WASC-ACCJC students. In essence, the TPPF report advances broad assertions about the overall quality of institutional accreditors based on the incomplete data set for a single, arbitrarily selected, program-level metric that is not applicable to the vast majority of students.

6. Alternative Measures of Economic Return on College Investment

Since the federal loan debt is not applicable to most students, relevant measures of the economic return on investment in one's education are required. For example, the Postsecondary Value Commission recently concluded that *net price as a percent of earnings* metric is one such relevant indicator. The graph below shows the overall performance of former regional accreditors on this measure.

Exhibit 2.



Net Price: Average net price (both public and private institutions) among undergraduate students receiving Title IV grants or loans // *Earnings*: Median earnings of aided students 10 years after entering college.
Data Source: DoEd / NACIQI Accreditor Data File (July 2022)
https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx

SACSCOC's performance on this metric is, generally, on par with other former regionals. In fact, it should be noted that **graduates of SACSCOC institutions receive a slightly higher return (lower ratios) on their higher education investments than students graduating from institutions**

accredited by most similar associations such as HLC and MSCHE, which is opposite to the claims made in the TPPF report and UniversityBusiness.com article. This is another example of how the facts – especially in context – clearly contradict TPPF's erroneous claims.

7. Out-of-Context Analysis and Interpretation: *State Economic Environment*

There are significant differences in economic / labor market contexts of states that define geographic areas of former regional accreditors and impact any metric using economic data. This is why contextual factors must be considered in any accurate analysis of student economic outcome metrics. For example, according to our analysis of recent SHEEO data, *states comprising the traditional SACSCOC region, on average, show the second lowest amount of public appropriations per FTE among the other former regionals* -- $8,598. The state average, for example, in the HLC region is $9,906 (or 15 percent higher than in the SACSCOC region) and in the MSCHE region is $12,796 (or very substantial 49 percent higher than in the SACSCOC region).

Furthermore, states comprising former regional areas are, also, quite different in the average "real personal income"[1] measure of the economic context. According to our analysis of BEA data, on average, *the 11 states in the traditional SACSCOC region show the lowest real personal income among all other former regionals* - $48,946. The state average, for example, in the HLC region is $52,869 (or 8 percent higher than in the SACSCOC region) and in the MSCHE region is $59,311 (or substantial 22 percent higher than in the SACSCOC region).

Overall, **SACSCOC member institutions operate in the states that, on one hand, allocate the second lowest amount of public higher education appropriations per FTE compared to states in other former regionals and, on the other hand, have the lowest levels of personal income**. Based on this context, coupled with the fact that SACSCOC has one of the highest shares of Pell grant recipients and minority students, it is plausible that SACSCOC students would, on one hand, need to borrow more than their peers in other regions and/or, on the other hand, would have comparatively lower earnings after graduation.

Thus, regional differences in state economic contexts are likely to have, at least some, impact on both the numerator and denominator components in the debt/earnings ratio metric that the TPPF used to rate institutional accreditors. However, *the TPPF report neither controlled for those differences in the analysis nor considered the differences in the interpretation of findings*.

8. Out-of-Context Analysis and Interpretation: *Student Socio-Economic Background*

There are also significant differences in student population profiles across former regional accreditors. For example, many students in SACSCOC member institutions come from lower socio-economic backgrounds. In fact, **SACSCOC has the highest proportion of Pell grant recipients among the former regional accreditors.** Consequently, SACSCOC students are likely to experience more challenges in financing their college education than students in other regions. Excluding the Western region (that has degree level specific agencies), the average proportion of Pell recipients for the former regionals ranges from 29% for NWCCU to 38% for SACSCOC, which is a quite significant 31 percent difference [2022 NACIQI Accreditor Data File - https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx].

Further, **more than half (53%) of students enrolled in SACSCOC institutions are non-White**. Compared to, for example, HLC that, on average, has 39% of non-White students, the difference between SACSCOC and HLC on this aspect is a substantial 36 percent [2022 NACIQI Accreditor Data File - https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx].

It is reasonable to expect, and consistent with education and social research, that the amount of personal funds available to finance college education is likely to have a significant impact on the amount of debt incurred by students. In addition, student racial/ethnic background might influence

[1] Real personal income is personal income at regional price parities (RPPs) divided by the national personal consumption expenditures price index. RPPs are regional price levels expressed as a percentage of the overall national price level for a given year. The price level is determined by the average prices paid by consumers for the mix of goods and services consumed in each region

post-graduation earnings given the persistent vestiges of systematic and structural racial inequalities in the labor market. However, *the TPPF report neither controlled for regional differences in student populations in the analysis nor considered these differences in the interpretation of findings.*

9. Out-of-Context Analysis and Interpretation: *Mix of Academic Programs*

A specific mix of degree levels (associates, baccalaureate, etc.) as well as types (by discipline / field) of academic programs offered by a given institution tends to reflect the unique mission of that institution and local/regional labor market demands. It is reasonable to expect that different regions might have different patterns in the distribution of academic programs. It is also plausible to assume that academic majors would have, at least some, impact on post-graduation financial outcomes or that graduates from different majors would have different starting salaries (e.g., FinTech major *vs.* Social Work major).

In fact, one of the previous TPPF reports clearly acknowledged and explored the impact of academic majors on the debt / earning measure; however, *potential differences in the mix of academic programs by discipline or field among the former regionals were not examined in the TPPF's rating of institutional accreditors.*

10. Lack of Constructive Feedback

From the TPPF's perspective, there are three solutions to the asserted problem of high student debt and low post-graduation earnings. First is to increase regulatory oversight of programs. However, the report does not offer any specifics of what this increased regulatory oversight might involve, does not consider any additional reporting burden on programs and institutions, and does not clearly indicate whether this increased oversight is a primary responsibility of the institutional administration or one of the triad partners – federal government, state, or accreditors.

The second proposed solution is to enhance financial aid / debt management counseling. Again, the TPPF report does not offer any details on specific interventions. Further, the report does not acknowledge that some institutional accreditors (for example, SACSCOC) have recently introduced new accreditation standards aimed precisely at helping students to manage borrowing and debt.

The third solution advanced in the TPPF's report is to simply restrict or stop enrollment in the academic programs that do not meet the debt/earnings ratio benchmarks that, as it was mentioned above, appear to be set arbitrarily, especially when reviewed at the institutional level. The TPPF report does not consider any public good and/or political implications of such actions and does not specify which of the triad partners, if any, would have an authority to restrict enrollment in specific programs offered by a given institution.

The main policy recommendation advanced by the TPPF report and UniversityBusiness.com article is for institutions currently accredited by SACSCOC to seek accreditation from "high performing accreditors", specifically HLC as a primary alternative accreditor or NECHE and NWCCU as other recommended options. However, the **key question of how a change in the institutional accreditor (while keeping all other factors constant) would result in lower student borrowing and/or higher graduate earnings is not addressed** either by the TPPF report and UniversityBusiness.com article. In addition, both publications do not recognize that this recommendation might potentially put institutions in a situation of competitive disadvantage vis-à-vis their new peers since student populations are not likely to suddenly change and the public higher education appropriations and income levels in their states are not likely to significantly increase once the institutions change the accreditor.

11. Selective Focus on Accreditors

Student borrowing intensity and post-graduation earnings are complex issues that require attention and concerted action from all members of the higher education quality assurance triad -- federal government, states, and accreditors – as well as individual institutions and individual students. However, the TPPF report and UniversityBusiness.com article did not mention the important roles of the states and/or federal government might play in shaping the general socio-economic context and especially labor market conditions that are likely to impact both the numerator and denominator of the TPPF's ratio metric – amount of student debt and post-graduation earnings. Instead, **the publications associate program-level performance on the debt/earnings metric *solely and exclusively* with accreditors, specifically institutional, former regional accreditors.**

As a primary intervention to improve program performance on the debt/earnings metric, the TPPF report advocates for increased levels of regulatory monitoring and control over individual educational programs that perform below standards set by the TPPF. The report, however, does not specify what this increased regulation might entail and **does not identify what regulatory authority and associated mechanisms institutional accreditors have at their disposal, *if any*, to impact the amounts of federal loans borrowed by individual students and their families or to influence regional labor market employment rates and starting salaries.**

12. Flawed Foundational Assumptions

The TPPF report and UniversityBusiness.com article are based on two unsubstantiated implicit assumptions. First, the publications seem to *assume that former regional accreditors differ significantly in terms of accreditation criteria and/or evaluation procedures*. However, neither of the publications identified any substantial differences in standards and processes among former regional accreditors that are likely to lead to significant differences in institutional performance, in general, and in program-level performance on the debt/earnings ratio metric specifically.

Second, TPPF and UniversityBusiness.com appear to *assume that institutional accreditation standards and/or review processes have a direct impact on, at least, one of the two specific components of the single, program-level metric used in the study -- the amount of debt borrowed by students and/or income of graduates*. This assumption appears to be based only on the TPPF's own descriptive review of distributional patterns of programmatic performance while using incomplete data and not controlling for any contextual factors. Neither of the publications referenced any peer-reviewed research studies that have established the cause-and-effect relationship, or at least solid association, between specific accreditation standards and/or processes on one hand and the levels of student borrowing and/or earnings of graduates on the other hand.

Without this cause-and-effect relationship firmly established and confirmed through peer-reviewed research, conclusions made by TPPF and UniversityBusiness.com inappropriately oversimplify the complex issue of student success. Further, their fundamental policy recommendation to change accreditors is unlikely to affect student borrowing and/or earnings among institutions in the southeast. Such perspective is akin to an expectation that if an individual with a low credit score moves their account from a bank that primarily uses Experian credit score algorithm to a bank that primarily utilizes TransUnion algorithm, the individual will start paying their debt on time and/or decrease the amount owed without making any other changes in their behavior.

III. Role of Institutional Accreditors

Although accreditors cannot directly control or influence student debt and/or graduate earnings, debt management and career readiness are, indeed, important aspects of the overall student educational journeys and they should be and, in fact, are considered by institutional accreditors, albeit indirectly. Indeed, there are several important intersections between SACSCOC standards and issues related to student debt and post-graduation financial success at the institutional level.

One example is from the ***student debt perspective***. Core Requirement 13.1 (financial resources), standards 13.2 (financial documents), 13.3 (financial responsibility) and 13.4 (control of finances) of the SACSCOC Principles of Accreditation focus on ensuring institutional financial stability, which is likely to have an indirect impact, at least to some extent, on the net price of college education through tuition and room & board charges on one hand and institutional financial aid on the other hand. In turn, the net price, in association with student socio-economic background, is likely to have an impact on the student's decision to borrow and the loan amounts. Thus, in any comparative studies of accreditors in the context of student debt, it is important to examine the net price, which varies greatly by region, as well as the overall financial stability. For example, excluding the two degree-level specific Western associations, **SACSCOC has the lowest mean average net price among the former regional accreditors -** $13,773, which is a dramatic 73 percent lower than the average net price in the NECHE area -$23,795 [[2022 NACIQI Accreditor Data File - https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx]. In addition, SACSCOC has proportionally less institutions on the federal Heightened Cash Monitoring (HCM) – that reflects important financial management indicators -- than WASC-SCUC, HLC, MSCHE, or NECHE [2022 NACIQI Accreditor Data File - https://sites.ed.gov/naciqi/files/2022/06/Accreditor-Data-File-Updated-Summer-2022.xlsx].

Further, although many SACSCOC colleges and universities do have significant room for improvement regarding timely repayment of student loans, according to our analysis of IPEDS data, **in recent years, SACSCOC member institutions demonstrated 18 percent improvement on the Cohort Default Rate (CDR) metric**. This is likely to be, in part, due to the adoption of the new standard (12.6) on student debt and financial literacy that was introduced in the 2018 edition of the SACSCOC Principles of Accreditation.

The *standard 12.6* **requires institutions to provide information and guidance to help student borrowers understand how to manage debt and repay loans**. A recent summary analysis of institutional responses to standard 12.6 shows that SACSCOC colleges and universities utilize a wide variety of approaches to provide financial literacy and debt management information and guidance to students. In addition, SACSCOC staff have been systematically tracking and monitoring both debt and earnings indicators at the institutional level since this type of data became available several years ago.

In addition, SACSCOC encourages institutions to help students to manage their debt through *standard 7.2* (Quality Enhancement Plan or QEP). QEP is a unique component and hallmark of the SACSCOC review process. Standard 7.2 requires institutions to develop and implement comprehensive plans to improve a focused area of student learning or student success for a significant segment of the student population. In recent years, colleges and universities increasingly select **QEP topics related to debt management and financial literacy**. For example,

- East Central Community College is currently implementing the "Dollars & $ense" project that is designed to enhance student knowledge of practical financial principles in both personal and educational contexts, enhance student capacity and confidence in making financial decisions, and consequently, improve student completion, retention, and educational loan default rate outcomes.
- Hill College's program "Focus on Financial Fitness" aims to enhance student's financial education with essential resources that support their financial well-being at the institution and into the future.
- Tarleton State University designed the "Texan Smart" QEP to improve financial wellness among first-time-in-college students during their first-year experience through a series of interventions that increase their knowledge and skills to manage financial resources effectively.
- Stephen F. Austin State University's QEP project integrated ongoing institutional initiatives such reducing the cost of educational materials, restructuring tuition and fees, and promoting financial literacy and currently focuses on timely degree completion as a means of reducing student debt.

From the ***post-graduation earnings*** perspective, SACSOC engages member institutions in ensuring that students are provided with appropriate educational experiences that adequately prepare them for successful careers in their chosen fields. For example, SACSCOC *standard 8.2* (student outcomes) requires institutions to implement a comprehensive system to monitor **student achievement of**

expected learning outcomes and to implement evidence-based improvement actions if the outcomes are not attained.

Also, several SACSCOC standards expect institutions to have systems and structures in place to assist graduates in securing employment. For example, **Career Services** is a prominent aspect of institutional responses to (and peer evaluators' reviews of) *Core Requirement 12.1*, which expects institutions to provide appropriate academic and student support programs, services, and activities consistent with the mission. In addition, **Job Placement Rate** is commonly selected as one of the measures of student achievement in institutional responses to *Core Requirement 8.1* that expects institutions to set (and justify) minimum threshold of acceptability, set (and justify and publish) target goals, and evaluate (and publish) outcomes on the selected measures of student achievement.

Finally, while responding to SACSCOC *standard 7.2* (Quality Enhancement Plan - QEP), a growing number of member institutions choose to develop and implement **projects aimed at preparing students for post-graduation employment**. For example,

- Francis Marion University's Professional Experience and Knowledge (PEAK) QEP goals involve students understanding how academic learning can be applied in professional contexts, developing students' career-readiness skills, and increasing opportunities for internships and other professional experiences. PEAK is designed to develop students' "soft" skills such as etiquette, interpersonal communication, resume building, interviewing, professional appearance, networking, and provide professional experiences.
- Milligan University's "ConnectU!" QEP aims to enhance the foundation for career readiness by more intentionally helping students connect their individual career development and readiness with what they are already receiving through Milligan's curricular programs and support services.
- The University of Montevallo's "Progression to Profession" QEP is designed to integrate intentional career planning through classroom enhancements and advising opportunities to engage students in career planning throughout their college experience.
- Morehead State University's QEP "Level UP! Experience Your Future" seeks to improve the employability of undergraduate students by using high impact experiences (e.g., undergraduate research, education abroad, service learning, and internships) as a mechanism to foster essential career skills.
- North Central Texas College's current project "Aspire to be Hired" promotes students' marketability and preparedness by building their awareness of the importance and impact of employability skills, improving their ability to articulate these skill sets, and offering opportunities to apply professional skills and knowledge.
- One of the aims of Spelman College's "Creating Your Path to Life and Career Excellence" QEP is to help students develop personal and professional skills associated with high performance in interviews and on-the-job challenges and to prepare students to compete in a dynamic work environment.
- South Louisiana Community College's "It Ends with a Career" QEP integrates employability skills in courses to help strengthen students by preparing them to compete globally and resolve complex problems. As part of the QEP, targeted employability skills will be introduced by faculty via coursework in their respective disciplines. Additional career-focused activities will be conducted by SLCC's Career Services department and will include feedback on resumes and cover letters as well as mock interviews with industry leaders. Opportunities to practice career-focused activities will differ for students based on the nature and content of their specific degree programs
- The University of Texas San Antonio is now implementing "Bold Careers" QEP to develop undergraduate students' marketable skills and career readiness through experiential learning.
- Virginia Tech's "Bridge Experiences" QEP to embed specific experiential learning activities into the curricula of 50% of undergraduate academic degrees. These bridge experiences are envisioned to integrate academic knowledge with an environment that is related to a

student's intended career path and to bridge student development to the next step after graduation. Typical bridge experiences include internships, undergraduate research, and other site-based experiential learning.
- Voorhees University's QEP "Strengthening Guided Career Pathways" aims at increasing the number and types of experiential learning opportunities available to students; developing experiential learning outcomes based directly related to students' programs of study; providing culturally and globally relevant learning opportunities through study abroad and study away initiatives; and evaluating the acquisition and transfer of knowledge, skills, and abilities in relation to a student's chosen career path.

Institutional accreditors do not have authority or mechanisms to control and minimize the amounts of federal loans borrowed by individual students and their families or to control and increase regional labor market employment rates and starting salaries. In other words, accreditors cannot exercise direct control over the components of the metric used by the TPPF to evaluate their overall quality. However, as the above-mentioned SACSCOC examples illustrate, accreditors work determinedly with member institutions to ensure that students know how to manage their finances (including debt, if applicable) and that graduates are appropriately prepared for the college to workforce transitions.

IV. Conclusion

The TPPF report and UniversityBusiness.com article raised important questions regarding accreditors and their role in ensuring student success. However, serious conceptual and methodological issues in the study as well as use of labels such "worst regional accreditor" distract the readers' attention from the real challenges that face higher education community in general and institutional accreditors specifically – access, affordability, and post-graduation success. In essence, the study's flaws led to erroneous conclusions contradicted by the data and unsupported by higher education research.

SACSCOC member institutions provide access to college education to more economically disadvantaged and minority students than institutions accredited by other similar former regional associations. Further, although SACSCOC schools are located in the states with lower levels of public funding for higher education relative to other regions, SACSCOC colleges and universities work hard to keep education affordable and maintain the lowest net price compared to institutions accredited by other similar former regionals. In addition, despite operating in the states with the lowest levels of personal income compared to other regions, on average, SACSCOC members institutions perform on par with (and in many instances better than) other former regional accrediting associations on both the debt as a percent of earnings and net price as a percent of earnings measures of student post-graduation financial success.

SACSCOC prides itself on the fact that member institutions provide access to populations that present with greater social, economic and educational challenges than students served by other former regional accreditors. The fact that SACSCOC colleges and universities are still able to, on average, achieve student success levels on par with other accreditors indicates the strength and commitment of our institutions to quality. Thus, on average, **SACSCOC member institutions appear to be more effective than schools accredited by other former regional associations in facilitating student access, affordability, and post-graduation success.** But does this fact make SACSCOC the "best institutional accreditor"? Of course, not.

First of all, the whole idea of rating or ranking seven accreditors who have substantially similar standards and processes but operate in qualitatively different socio-economic environments is meaningless and inappropriate, at least at this point in time with regional boundaries having been only recently removed. Secondly, if such a rating should occur, it needs to use a broad range of composite measures addressing the multi-dimensional and multi-faceted nature of higher education. Thirdly, any valid, research-based rating project should control for a multitude of contextual factors in the analysis and/or consider those factors in the interpretation of results.

The TPPF report and UniversityBusiness.com article attempted to address a valid and growing public demand for clear indicators of higher education quality across accrediting agencies. Indeed, we wholeheartedly agree that institutional accreditors need to continue working collectively with other triad members as well as educational researchers and practitioners to identify such indicators, monitor performance of member institutions on those indicators, and report on institutional performance levels to the public. The work of the Postsecondary Value Commission is a good example of a thoughtful approach to address the public demand for information on institutional performance. In contrast, TPPF's ranking of institutional accreditors – based on review of incomplete program-level data for a single metric without taking into consideration any relevant contextual factors – is not helpful in promoting student success, ensuring effective accountability, and advancing institutional quality and continuous improvement.