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September 16, 2025

**VIA E-MAIL**

Commission for Public Higher Education  
c/o Cameron Howell

Dear Commissioners:

The American Council of Trustees and Alumni (ACTA) commends the Commission for Public Higher Education (CPHE) for its work to increase accountability in American higher education by providing an accreditation option with rigorous, outcomes-based standards.

In its August 19, 2025, Request for Comments, CPHE laudably prioritizes “simplicity and clarity” in its standards, in service to its mission of reducing bureaucracy and creating a more efficient accreditation process. As such, we identify several standards that we recommend consolidating or striking as duplicative. We also suggest ways to augment or clarify certain standards that are vague enough to invite unduly subjective judgment.

We encourage CPHE to consider how strengthening individual standards can better allow for the objective assessment of institutions while also differentiating CPHE from traditional, process-focused accreditors. While CPHE has noted that it intends to provide additional guidance in accompanying documents, we strongly advise CPHE to incorporate specific requirements into its standards. Without taking this step, these standards alone are likely not “adequate and comprehensive enough” to fulfill their statutory requirements for institutional assessment and may lack the objective measures needed to fulfill CPHE’s mission.

**Integrity, Transparency, and Compliance**

The language of Standard 2 (“The institution is transparent in its policies and practices”) is unduly vague. We recommend that CPHE consider adopting language similar to the New England Commission of Higher Education’s [Standard 5](#) (“the institution . . . provides complete, accurate, timely, and accessible information to all constituents”) or the Higher Learning Commission’s Standard [2.B](#) (“The institution presents itself accurately and completely to students and the public”).

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We recommend that CPHE strike Standard 4 for several reasons. First, none of the 10 standards that appear in [20 U.S.C. § 1099\(b\)\(a\)\(5\)](#) call for accreditors to enforce federal or state law. Government agencies, outside of the private accreditation system, are better equipped to perform this function. Second, because federal and state laws and regulations often conflict, enforcing Standard 4 would require CPHE to use valuable resources to adjudicate such conflicts. Further, Standard 4 would unnecessarily cede CPHE's autonomy to the federal government, binding it to withhold accreditation from a member whenever so directed by the U.S. Department of Education. Finally, violations of the law should already represent a violation of the call for integrity in Standard 1.

We recommend that Standard 5 be stricken as superfluous. Institutions that participate in the Federal Student Aid program under Title IV are already required to maintain a [program participation agreement](#) with the secretary of education that requires them to comply with a number of laws, regulations, and policies governing Federal Student Aid programs. Standard 5 thus appears to be duplicative, which runs contrary to CPHE's mission of process efficiency.

We recommend that CPHE revise Standard 8 to read: "The institution reports incidents of non-compliance with these standards to the Commission for Public Higher Education, upon receipt of reasonable evidence, within a timely manner of such non-compliance" (addition underlined).

### **Continuous Improvement**

We recommend that CPHE modify Standard 9, as it is inconsistent with its stated goal to "Focus on student outcomes rather than on inputs as indicators of excellence." Standard 9, which reads "The institution enacts processes for continuous improvement," is by definition a measure of inputs. While we recognize that it is important for institutions to have effective processes that contribute to student success, they are merely a means to an end. Instead of evaluating processes, CPHE should augment Standard 9 to require member institutions to demonstrate continuous improvement using objective, ideally quantifiable, outcomes-focused measures. In addition, we recommend that CPHE specify what it considers "appropriate intervals," as this language invites subjective interpretation.

### **Governance and Leadership**

We recommend that CPHE strike or temper Standards 10 and 11, as governance is not a statutorily mandated criterion under 20 U.S.C. § 1099b(a)(5) and accreditors [often abuse](#) governance standards to intrude into the prerogatives of trustee boards. At a minimum, Standard 10 should be revised as follows: "The institution's governance structures and practices—both at the system level and at the institutional level, as applicable—demonstrate sound fiduciary oversight as defined by the institution's charter, bylaws, and relevant state statutes, as well as sound executive management" (addition underlined).

Moreover, if CPHE decides to retain Standard 11, it should be revised to read: "Institutional decision-making is characterized by shared governance in appropriate processes and as

documented in appropriate policies, subject to institutional mission” (addition underlined). While CPHE would best avoid stifling innovation by eliminating Standards 10 and 11 altogether, these revisions would provide a modest amount of tempering.

### **Mission and Public Purpose**

We recommend that Standard 13 be revised to read, “The institution, as a public entity, furthers the common good and the well-being of the public in general and the people of the state specifically” (addition underlined). Failing to give primacy to the duty that public institutions have to support students in their state has clear unintended consequences, such as rendering it difficult to justify charging increased tuition to out-of-state students.

### **Faculty**

We note that Standard 14, by measuring the “appropriate number and qualifications” of faculty, clearly assesses inputs as opposed to outcomes. This may be unavoidable given the mandate of 20 U.S.C. § 1099b(a)(5), so we encourage CPHE to direct its institutions to demonstrate that the number and qualifications of its faculty directly contribute to student outcomes.

### **Academic Freedom and Viewpoint Diversity**

We recommend that CPHE broaden Standard 15 to extend academic freedom to both students and relevant staff and broaden Standard 16 to extend protections to relevant staff as well. Securing students’ academic freedom is necessary to remove fear of censorship or retaliation for expressing heterodox viewpoints. In addition, including references to staff will ensure that the academic freedom of nonfaculty instructors is appropriately protected and that intellectual diversity is rightfully promoted among student-focused administrators.

Furthermore, we note that these standards only assess the existence of policies and practices. Given CPHE’s stated goal of centering student outcomes, we recommend that CPHE require institutions to examine their programs’ effectiveness through annual campus climate surveys. Should CPHE wish to provide additional value in its accompanying documents, it could form a committee with representatives from each member institution to draft a basic survey that each institution can modify to suit its own needs. The availability of a methodologically rigorous, comparable survey would allow members to identify which practices are most effective at building a culture of free expression on campus.

### **Curricula**

We strongly recommend augmenting Standard 17 to require explicitly objective accountability metrics: “Institutional curricula are appropriate to mission and designed with rigor appropriate to degree level and/or credentialing requirements, as reflected in average assessment scores indicating learning gains at or above what would be expected of an institution testing students of similar academic abilities. Institutions demonstrate this rigor using externally validated,

nationally-normed outcome assessments in core collegiate areas such as writing, quantitative reasoning, and general education” (addition underlined).

While we recognize CPHE’s intent to supply evidentiary guidance through supplementary materials as opposed to the standards proper, mandating the use of nationally normed assessments of student learning gains would distinguish CPHE as the leading accrediting agency in enforcing accountability for student outcomes. Studies have found that [less than 3%](#) of accreditor actions involve penalizing an institution due to poor student outcomes or academic programming. One reason is that accreditor standards regarding academic performance are often self-referential and therefore ineffective. CPHE can break this paradigm.

### **Measures of Program Length**

We caution CPHE not to prescribe a specific target degree length when it writes its guidance to Standard 18. Currently, two out of the six regional accreditors mandate that baccalaureate degrees require a minimum of 120 credit hours for graduation, a standard that unduly inhibits innovation by institutions that may wish to deliver an accelerated degree program option at lower cost to students. Instead, CPHE should require institutions to demonstrate that programs are long enough to allow students to develop the skills and competencies needed to succeed in their fields, which can be done using a number of student outcome measurements, including those described in Standard 17.

Thank you again for the opportunity to comment on CPHE’s draft standards. You are providing a much-needed service to higher education.

Respectfully,



Armand Alacbay  
Chief of Staff and Senior VP of Strategy