

————— Council of —————
Recognized Accrediting Commissions

Accountability with Integrity:

A NATIONAL FRAMEWORK FOR DATA-INFORMED
HIGHER EDUCATION ACCOUNTABILITY

Introduction

Across American higher education, community colleges, public and private universities, graduate institutions, and their accreditors are being asked to demonstrate that programs deliver measurable value for students and society; students, their families, and American taxpayers deserve accountability. Conveying the value and integrity of a higher education credential depends on a modern, integrated evidence base. Without reliable and comparable data, institutions and accreditors alike are being asked to prove value with tools that cannot provide accurate or actionable information. These data elements remain incomplete, inconsistent, or inaccessible across federal and state systems.

As guarantors of educational quality, accreditors play a primary role in accountability for student achievement and program-level outcomes, and with more actionable data, can play an even more impactful role. Institutional accreditors continue to improve public dashboards and often incorporate available post-completion value metrics derived from currently available data. While they maintain responsibility to act with rigor, fairness, and transparency in the present, they have not been able to hold institutions accountable for program-specific post-completion outcomes due, in part, to weak data elements and the lack of data system integration. Institutional accreditors remain committed to accountability work and are supportive of oversight around post-completion value, provided that the most reliable and comparable data are available.

A coordinated, data-informed accreditation system can strengthen accountability and continuous improvement across all levels of higher education, comply with evolving federal regulations, and provide clarity and transparency for both students and the public. However, a quality-assurance infrastructure can only function effectively when built upon accurate information about post-enrollment and graduation outcomes. Accreditation, when supported by trustworthy data, offers the most effective lever for ensuring accountability that is fair and improvement-focused across all levels of higher education. Accordingly, the nation's existing higher education data systems must be modernized and integrated, as necessary, to support a transparent, nationally consistent view of student achievement.

Background

Traditional metrics used by accrediting agencies such as course success, term-to-term persistence, program completion, retention, transfer, licensure, and graduate placement, remain central to institutional improvement. Yet the public increasingly expects transparency about how students' economic prospects improve as a result of engaging with an institution and what happens after graduation: employment, earnings, and the affordability of loan payments relative to those labor market outcomes. While institutions now generate vast amounts of data, and despite promising practices that have emerged, there is no unified national system capable of consistently connecting academic outcomes to workforce and social-mobility measures to allow for analysis and comparison. Persistent barriers hinder data-driven improvement and accountability across all levels of higher education.



A Model for Accountability

For nearly six decades, higher education accountability in the United States has been anchored by a durable and largely effective triad. Accrediting agencies, State agencies, and the U.S. Department of Education each play a distinct but complementary role that, together, balances institutional autonomy with public protection.

Accreditors' roles within the Triad include compliance enforcement and shaping institutional behavior through structured review and required improvement. Institutions ranging from large urban community colleges to regional public universities and rural technical colleges implement significant reforms after participating in accreditor review processes. Peer review findings prompt context and mission-specific action plans tied to student learning, governance, or assessment infrastructure, and the resulting improvements are followed by accreditation reaffirmation and measurable gains in student success metrics, as documented in publicly available federal data.

State agencies address consumer protection concerns, leveraging state statutes, regulatory agencies, and enforcement staff and mechanisms that can respond quickly and decisively to violations of state law, misrepresentation, or fraud.

An example of national accountability is the U.S. Department of Education's statutorily authorized measures of financial stability and cohort default rates. Although only applied to Title IV participating institutions – and not without some limitations in scope and design, the federal system's shared definitions, transparent metrics, and graduated enforcement tools, from Heightened Cash Monitoring to the ultimate withdrawal of Title IV eligibility, create a predictable and fair progression of accountability. The U.S. Department of Education-defined thresholds backed by statute and regulation, as well as consistent, universally applied data and definitions demonstrate how default rate tracking can function as an accountability system, appealing to government entities, consumer watchdogs, families, and students alike.

This coordinated framework has supported the protection of students, safeguarded public investment, and preserved institutional diversity. Strengthening the triad's accountability function can be most effectively achieved through similarly modeled data transparency coupled with statutory refinement and the continued evolution toward outcome-oriented measures.

Recent federal regulatory developments further underscore both the urgency of improved post-completion accountability and the limitations of existing data infrastructure. In January 2026, the negotiated rulemaking committee convened by the U.S. Department of Education reached consensus on a new earnings-based framework for program-level accountability authorized under the One Big Beautiful Bill Act. This framework, which is expected to be issued by the Department as a Notice of Proposed Rulemaking in the Federal Register and subject to a public comment period prior to finalization, relies on federal administrative data sources to compare post-completion earnings of Title IV aid recipients to defined benchmark populations. Under the



proposed approach, programs with persistently low earnings outcomes would face consequences limited primarily, but not exclusively, to Federal Direct Loan eligibility. If finalized as anticipated, this framework would expand nationally standardized comparability in postsecondary outcomes measurement. Included with the new framework are expanded transparency provisions whereby the U.S. Department of Education will calculate and publicize median post-college earnings, earnings premium, and median loan debt. Institutions will be required to warn students who enroll in a program that does not pass any single year earnings test.

At the same time, the structure of the proposed federal accountability framework reflects the same data constraints and analytic gaps identified throughout this paper. The earnings measure under consideration is calculated at a fixed-point following program completion, applies narrowly defined comparison thresholds, and excludes substantial segments of the postsecondary population, including noncredit learners, students who do not receive Title IV aid, and many short-term workforce programs. The framework does not incorporate net price, longitudinal earnings growth, transfer-driven educational pathways, or localized cost-of-living variation beyond limited geographic adjustments. As a result, even if implemented as proposed, the federal earnings-based accountability system would establish an important baseline for transparency without providing a complete or context-sensitive representation of program value. This reinforces the need for a modernized, integrated data infrastructure and highlights the continuing role of accreditation in situating federally derived metrics within a broader, evidence-based understanding of student achievement, institutional mission, continuous improvement, and quality assurance.

A Disjointed Data Ecosystem

The United States does not have a single, integrated education–workforce data system that captures all accredited institutions. Instead, information is scattered across federal agencies, state longitudinal systems, and institutional datasets that rarely align. Ithaka S+R’s national study of state use of IPEDS illustrates this fragmentation. Although states depend heavily on Integrated Postsecondary Education Data System (IPEDS) data, they must continually reconcile inconsistencies between state-collected and federally collected information, producing an “interconnected” but fundamentally disjointed system.¹ This fragmentation forces states and institutions to build workarounds rather than rely on a coordinated evidence structure. California Competes amplifies this challenge in *Out of the Dark*, documenting how California’s essential education and workforce data are split across multiple agencies, higher education systems, and workforce bodies without clear mandates or governance structures for sharing.² Even the most data-rich states cannot solve structural fragmentation without federal integration.

It is important to note that the National Student Clearinghouse (Clearinghouse), having navigated student privacy concerns, maintains a robust nationwide repository of postsecondary enrollment and degree/credential records for all students, capturing nuances in student attendance patterns that are not possible in any other data set. In return for participation, colleges receive assistance with transcript and related reporting/compliance processes such as reporting enrollment to the National Student Loan Data System (NSLDS). Clearinghouse sells additional data access products to institutions seeking deeper analysis. Most U.S. colleges participate and regularly submit enrollment and degree information, which is what makes Clearinghouse’s coverage of student data unusually comprehensive. The Clearinghouse is positioned to enhance its value by integrating income and workforce data into its reporting. As with any intermediary data infrastructure, the long-term public value of such a model would depend on governance, cost transparency, and equitable access for institutions and stakeholders, including the public.

Student data are only part of the equation when post-completion value is assessed. Employment and earnings data must also be extracted and matched to student records. Current state and federal employment and earnings data collections are created for other objectives, such as tax code compliance, payroll reporting, and unemployment insurance, rather than for evaluating educational outcomes. State records may exclude substantial segments of the labor market, such as self-employment, contract work, military service, and interstate mobility, and neither state records nor federal tax records capture hours worked, occupation, or career progression. And because wage data are often available only after significant delays, their use in high-stakes, time-sensitive accountability decisions is problematic.

¹ <https://sr.ithaka.org/publications/state-uses-of-ipeds-data>

² https://californiacompetes.org/wp-content/uploads/2022/12/CACompetes_Data-System-Brief_Final.pdf

With enrollment, financial aid, and earnings information collected separately and rarely connected into a coherent accountability framework, the result is a time-insensitive and piecemeal national information environment in which policymakers, accreditors, and families struggle to see the full picture of student success, which is untenable for modern accountability.

LIMITED INCLUSION OF NONCREDIT LEARNERS

Although more than 60% of non-degree credential data are captured through the National Student Clearinghouse, many of those students who most need visibility in national data are structurally undercounted in federal and state reporting, contributing to incomplete or inaccurate post-completion metrics even though non-credit programs may reflect a range of educational, career, and personal offerings that can play an important role in increasing earnings, supporting local workforce needs, preparing students for higher level coursework, and providing additional enrichment to the broader community. For instance, IPEDS enrollment counts exclude noncredit students, leading to distortions in basic metrics.³ Since noncredit and short-term programs are essential workforce pathways, their exclusion undermines the reliability of national analyses and leaves significant gaps in the ability of the higher education system to either amplify or evaluate the post-completion outcomes attributable to those programs. The IPEDS Technical Review Panel #62 confirmed this inconsistency in 2020. Convened specifically to address noncredit and workforce training activity, the panel concluded that IPEDS currently provides an incomplete and sometimes misleading picture of the nation's higher education landscape and recommended multiple changes to instructions and definitions.⁴ When entire populations of learners are missing from federal systems, accountability frameworks become inherently incomplete.

INCONSISTENT DEFINITIONS OF KEY METRICS

Without consistent definitions, employment statistics cannot be compared across institutions or used fairly and reliably for consumer information or accountability. The long history of changing federal Gainful Employment rules further illustrates the definitional inconsistency. The National Association of Student Financial Aid Administrators (NASFAA) Untangling Gainful Employment report explains how measures have shifted over time. The use of debt-to-earnings ratios, earnings thresholds, or repayment metrics have been the subject of intense debate,⁵ illustrating that even core constructs such as “gainful employment” lack stable meaning nationally.

A parallel data definition problem exists with completion, which is one of higher education's most widely used and inconsistently defined data points. The traditional IPEDS graduation rate includes only first-time, full-time students, excluding part-time, transfer, noncredit, and returning

3 https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC_Paper_Noncredit_Enrollment_and_Related_Activities.pdf

4 https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP62_Summary.pdf

5 https://www.nasfaa.org/news-item/31544/Untangling_Gainful_Employment_Mapping_a_Path_Toward_Accountability_in_Higher_Education

adult learners who make up the majority of today's student population. This limitation has been widely criticized by the U.S. Department of Education National Center for Education Statistics (NCES) and external researchers and was a primary reason for the development of the IPEDS Outcome Measures (OM) survey component. However, Outcome Measures remain separate from the traditional graduation rate framework and are not consistently integrated into public accountability narratives.⁶ Further, education-focused research and advocacy entities also employ their own time definitions in calculating completion (100%, 150%, 200% of expected time), and some count students who transfer as "successful completers," while others do not. Student intentions and enrollment preferences are aggregated based on assumptions made that may or may not reflect the reality of each college campus.

When both completion and employment are measured differently across institutions and states, and within federal systems, basic accountability measures lose actionable comparability and validity. This definitional inconsistency leaves policymakers and the public navigating conflicting claims about institutional quality, precluding accreditors from applying standards equitably across diverse institutions.

MISAPPLIED PRIVACY RESTRICTIONS

Federal privacy law, particularly overinterpretation of FERPA, creates real operational challenges in linking data across sectors. Although FERPA does allow data sharing for audit, evaluation, and research purposes, the processes require complex written agreements and careful legal interpretation. The U.S. Department of Education's Student Privacy Policy Office explains that FERPA is often misunderstood or interpreted conservatively, leading agencies to avoid data sharing even when permissible.⁷ As a result, data that could be shared legally often is not. For example, state agencies frequently interpret FERPA and state privacy laws in ways that prevent even de-identified sharing of education and workforce data, leading to system-level reluctance to engage in cross-agency linkage.⁸ California Competes concludes that privacy concerns, while important, are frequently used as a blanket rationale to avoid collaboration, even when technical safeguards could support compliant sharing. Privacy restrictions, both real and perceived, have become barriers that slow or block responsible data use. This challenge is often exacerbated by layers of bureaucracy and involvement of multiple actors' legal counsel.

UNEVEN ANALYTIC CAPACITY

Even when data are available, not all institutions have the capacity or infrastructure to use them. A 2024 report, *Strategies for Building Capacity at Minority-Serving Institutions*, argues explicitly that MSIs require targeted investment in data and analytic capacity to engage in research, assessment, and continuous improvement at the same level as better-resourced peers.⁹ Without

6 <https://nces.ed.gov/ipeds/use-the-data/measuring-student-success-in-ipeds>

7 <https://studentprivacy.ed.gov/privacy-and-data-sharing>

8 https://californiacompetes.org/wp-content/uploads/2022/12/CACompetes_Data-System-Brief_Final.pdf

9 <https://researchinsociety.org/wp-content/uploads/2024/02/StrategiesForBuildingCapacity.pdf>

such investment, institutions, including but not limited to MSIs and many small rural institutions, risk being less able to respond with data-driven strategies for improvement.

These challenges affect the entire ecosystem, from open-access colleges to research universities, and must be solved collectively before program-level accountability can be fully realized. The stakes are high. Risks associated with incomplete or overly simplified post-completion accountability metrics include, but are not limited to, miscalculating program value due to cost-of-living variation, incentivizing program cuts that reduce student access, and penalizing institutions serving high-need communities and populations.



The Role of Accreditation in Modern Accountability

Much of the current accountability infrastructure in accreditation is designed to support system-level reporting and regulatory oversight rather than direct use by individual learners and families. Increasing attention to whether students and families can access, understand, and use information about education and employment outcomes highlights a growing trust and transparency challenge in higher education. Accreditors contribute by ensuring that outcomes data are examined and interpreted in context rather than applied mechanically.

To support institutional transparency and accountability, accreditors develop standards, collect data, sustain institutional relationships, and conduct context-informed reviews to support student achievement. Many consolidate data and encourage dialogue and improvement with metrics produced by the College Scorecard, National Student Clearinghouse, higher education nonprofit partners, and educational researchers committed to advancing value and return on investment (ROI) metrics such as the College Futures Foundation,¹⁰ Lumina Foundation,¹¹ Gates Foundation (Postsecondary Value Commission),¹² Strada Education Foundation,¹³ the HEA Group,¹⁴ Aspen Institute (College Excellence Program),¹⁵ New America,¹⁶ Third Way,¹⁷ and Georgetown Center on Education and the Workforce.¹⁸ The seven institutional accreditors of the Council of Recognized Accrediting Commissions (C-RAC) noted in Appendix A, respond to demands for data and context through dashboards and careful analysis. These agencies are structurally positioned to work directly with institutions in support of post-completion outcomes and rely on data submitted directly from institutions or on publicly derived data for monitoring, accountability, and transparency. Calculated post-completion value metrics are most often utilized in the context of requiring institutional reflection. For example, WASC Senior College and University Commission's Key Indicators Dashboard (KID) aggregates and highlights measurements related to post-graduate outcomes. This dashboard includes a comprehensive guide for institutional application of this data in pursuit of student employability and economic achievement. Efforts such as this dashboard and other accreditor-driven tools use currently derived information to advance program-level accountability, even with data shortfalls.

10 <https://collegefutures.org/>

11 <https://www.luminafoundation.org/>

12 <https://postsecondaryvalue.org/>

13 <https://stradaeducation.org/>

14 <https://www.theheagroup.com/>

15 <https://highered.aspeninstitute.org/>

16 <https://www.newamerica.org/education-policy/>

17 <https://www.thirdway.org/>

18 <https://cew.georgetown.edu/explore-our-roi-rankings/>



Through the lens of institutions' missions, accreditors address outcomes and affordability where they are able, balancing the use of economic value metrics calculated with wildly imperfect data systems against the risk of inadvertently diverting student-focused institutional resources to compliance objectives that do not have a stable and reliable method of measurement. Active engagement links accreditation to improved outcomes, and it is effective when data are robust.^{19 20} Developing a comprehensive data system would allow accreditors and institutions to create a laser focus on post-completion outcomes, ultimately advancing the shared goal of validating and improving economic outcomes for students.

19 Duarte et al., 2023: <https://doi.org/10.3390/educsci13060582> ,Quality in Higher Education (journal homepage): <https://www.tandfonline.com/journals/cqhe20>

20 Rahme et al., 2025 (PLOS ONE): <https://journals.plos.org/plosone/>, Jacqmin & Lefèbvre, 2021: <https://doi.org/10.1016/j.jpolmod.2021.01.004>

Data and the Value of Higher Education

The public deserves answers to the questions that matter most and help with decisions about their futures: What is the employment potential for chosen programs, and do those programs lead to good jobs? What do graduates earn? How much does completing requirements for a program cost? Is it worth the investment? These questions cross domains of employment outcomes, affordability, and return on investment, which are vital to the social contract between higher education and the public.

The objective remains clear. To best serve students and the public, institutions and accreditors must work together to clearly convey the true value of a higher education program or credential. This is done through data-driven reflection and consideration with directed questions to be asked and answered.

EMPLOYMENT AND CAREER OUTCOMES

Higher education's value extends beyond employment, but employment outcomes remain central to public trust. The questions that can help inform decision-making for students, institutions, and policymakers include:

1. *What percentage of graduates find jobs after completing their programs?*
2. *Do graduates from a college or program earn more than those without a degree?*
3. *How much do graduates make after earning a credential within a specific field of study?*
4. *Do graduates see upward mobility—both in income and career opportunities—after completing their degree?*
5. *Do non-completers show increased earnings compared to those who never enroll at a college or university?*

AFFORDABILITY AND COST TRANSPARENCY

Students cannot make informed choices without knowing both what an education costs and what outcomes they can expect. The questions that can help drive decision-making for students, institutions, and policymakers include:

6. *What is the true cost of attendance, including housing, books, and fees—not just tuition?*
7. *How much out-of-pocket costs are students responsible for after all grants and scholarships (excluding loans) are deducted (i.e. net cost)?*
8. *How much student debt do college and program graduates carry on average?*

9. *Are there affordable, high-quality alternatives to a degree (e.g., certificates, apprenticeships)? How does the value of this degree compare across different fields or institutions?*
10. *Is tuition variation associated with differing levels of spending on instruction and student support, and with variations in post-completion outcomes?*

RETURN ON INVESTMENT (ROI)

Students and families make education decisions based on expected returns and reliable ROI data, particularly at the program level, and allow policymakers, accreditors, and institutions to measure value with precision and fairness. The questions that can help inform decision-making for students, institutions, and policymakers include:

11. *How long, on average, does it take borrowers to repay all debt incurred to obtain the degree?*
12. *How long does it take for graduates to earn back the total cost of pursuing a higher education?*
13. *Does the cost of the program meet a reasonable earnings threshold (whether defined by the Department of Education or by accreditors)?*



Data Clarification and Modernization

To provide answers and clarity to students, families, and the public, a comprehensive data system is required. Career outcomes, cost transparency, and return on investment are more commonly used, but incomplete measurements persist across the national higher education landscape.

Immediate or near-immediate employment information has the potential to give students, programs, colleges, and accreditors real-time, actionable information about the most basic post-completion achievement: getting a job. To know that a student became employed within a six-month timeframe, data should be matched to each state unemployment or federal employee database. Using the individual, opt-in state unemployment system matching is insufficient, as employment of students who move for work would be missed altogether. It should also be noted that self-employed former students may not be captured in six-month data. In that case, a one-year metric would be optimal with data matching to the IRS or Social Security databases. Another essential component of this measurement would be to exclude from the denominator students who are continuing their education; the assumption being that they are not yet in the workforce. These data elements could be available through data submissions from institutions and subsequently matched to Unemployment, IRS, or Social Security System databases.

Assuming a total record of student completers (beyond first-time, full-time Title IV participants) is curated with institutional data, actual earnings can be extracted from the same government sources. Whether an employee works less-than-full time or overtime presents a challenge to getting expected full-time earnings figures from these sources. Once earnings are collected and (potentially) imputed, a comparison earnings figure will be required. Many value metrics use a statewide wage of the typical high school graduate derived from the American Community Survey deployed by the US Census. While this is a reasonable start, the figure could be regionalized to account for cost-of-living differences. The Census has county-level data, as do the Bureau of Labor Statistics and the Bureau of Economic Analysis. An index created by the MIT Living Wage Calculator could also support regionalizing comparison data, or price parity by region could be adjusted in alignment with the provisions of the One Big Beautiful Bill.

Upward mobility in income could be tracked through a longitudinal data system that records earnings from previously mentioned sources. While it would take time to build the initial database, actual wage increases could be captured on an annual basis and mapped to student records. The same datasets included above could be used to develop earnings thresholds similar to those developed by the Postsecondary Value Commission.²¹ These thresholds would also require adjustment for localized cost of living to be true and actionable measurements of value across institutions. Upward mobility in career opportunities is more challenging. None of the existing

21 <https://equity.postsecondaryvalue.org/datatool>

datasets hold job types or titles as a data element. Actual earnings would likely need to be a proxy for career growth, unless job categories and organizational levels could be collected in unemployment, tax return, and/or Social Security Administration data.

Some institutions have a large population of students who choose to take courses to build skills, advance in the workplace, or who face barriers to attending such as work obligations, families, or other scenarios that preclude program completion. Current College Scorecard earnings data for all students (used to derive the median earnings figure and the proportion of students who earn more than a high school graduate for each institution) is delivered by cohort and includes only students who received Title IV funding, whether or not they completed their program, leaving out a large block of students from earnings metrics. A complete dataset, covering all students and filterable by the same subpopulations mentioned previously, would allow longitudinal tracking of both completers and non-completers and provide a valuable additional earnings metric to accompany earnings information. It is important to note that this improvement would require Congressional action to overturn the collection and sharing of student unit records.

Cost of Attendance (COA) as currently collected captures a broad set of student expenses. At present, many components of COA, such as housing, transportation, and personal expenses, are constructed using institutional estimates that may vary in methodology and reporting practice across colleges. As interest grows in using cost data alongside student outcome measures to evaluate value and affordability, further clarification and alignment of COA definitions and reporting guidance could strengthen transparency and comparability across institutions. Where significant programmatic variations exist, colleges should be required to enter COA adjustments for programs as needed. It is particularly important to ensure that the cost of attending an institution is always clearly labeled as total cost versus actual price paid after aid and that student loan options are never subtracted from net cost. With a robust student data set that is mapped to unit-level FSA participation records, the actual cost to attend, net of any grants or scholarships received, can be calculated on a student-by-student basis for reliable ROI measurements.

Existing Sources

Although incomplete, some nationally available data integration is already taking place. Practitioners seeking to modernize and effectively integrate data systems to support a transparent view of student achievement can leverage data work that is already underway.

- College Scorecard²² from the U.S. Department of Education (ED)
 - Connects federal-aid records from IPEDs submissions to IRS earnings but omits students without Title IV aid.
 - Produces several post-completion outcome metrics calculated for students who have received a federal grant or loan, but data are not adjusted to account for part-time employment, and cost of attendance is not incorporated into these metrics.
 - Provides the broadest and most comparable dataset to date, but is still severely limited.
- Post-Secondary Employment Outcomes (PSEO),²³ a product of the U.S. Census Bureau
 - Works with a more robust student dataset, although only for some states.
 - State authorization for data sharing is required for employment and wage data.
 - Institutions voluntarily upload data files with graduate information.
 - Data are matched to census collections with employment and wage information derived from state unemployment insurance records; earnings by degree program are presented one, five, and 10 years from graduation.
 - Allows for comparison across all other institutions in the system and provides insight into which industries are employing program graduates.
 - Transparent, understandable, and offers actionable information in terms of student earnings calculations.
 - The tool provides side-by-side comparisons of program completer earnings, and eliminates the downward wage bias of part-time worker data.
 - Does not collect college cost information, and it is limited by incomplete state participation.
- The Postsecondary Data Partnership (PDP)²⁴, a paid service of the National Student Clearinghouse (NSC)
 - Established in 2017 to support institutions with more comprehensive data, easier analysis, centralized reporting functions, and interactive visualizations.

²² <https://collegescorecard.ed.gov/>

²³ https://lehd.ces.census.gov/data/pseo_experimental.html

²⁴ <https://www.studentclearinghouse.org/>



- o Data provided by participating PDP institutions are unique from existing national public and private sources as it is the only unit-record-level data collection platform that also connects to the national data NSC holds for enrollment and degree information.
- o Indicates commitment to the importance of including labor market outcomes data into their products and services.
- o Promising option for working with more detailed and actionable outcome data.
- o Comprehensiveness of the dataset would need to be considered against the optional nature and cost of participation.

In addition to public-sector data systems, emerging initiatives are exploring new approaches to improving the quality and timeliness of employment data. For example, the Jobs and Employment Data Exchange is a public-private effort focused on developing common standards for how employers share job and employment information, particularly through Unemployment Insurance reporting. While initiatives such as this remain early in development and outside existing accountability frameworks, it illustrates a potential pathway for strengthening employment data over time.

A national framework integrating IRS/Social Security, Census LEHD/PSEO, and Unemployment-Insurance (UI) data with IPEDS and National Student Clearinghouse-type records would enable verified, disaggregated metrics on completion, retention, persistence, transfer, employment, earnings, and social mobility by program of study.

Potential Recommendations

I. A Federal Solution: National Infrastructure for Secure, Student-Level Data

A federal solution would center on modernizing the national postsecondary data infrastructure to enable secure, privacy-protected, student-level data that follows learners across institutions, states, and into the workforce. This approach would establish a consistent national framework for measuring access, completion, affordability, and post-graduation outcomes. It could involve revisiting existing reporting structures, enabling responsible federal data linkages, and creating mechanisms to share aggregated, de-identified insights with institutions.

The strength of this model lies in comparability and scale: a single infrastructure capable of producing longitudinal, cross-sector insights.

II. A State Solution: Regional Data Compacts and Workforce Alignment

A state-centered model would build on existing statewide longitudinal data systems and higher education coordinating boards to create regional transparency compacts. States could align postsecondary data with workforce, unemployment insurance, and economic development systems to produce more actionable insights tied to local labor markets.

Under this approach, states could standardize outcome and affordability metrics across public institutions and potentially partner with private and nonprofit colleges within their borders. This model leverages proximity to workforce systems and may be more politically feasible than federal reform, but it risks fragmentation without cross-state alignment.

III. A Public-Private Solution: Sector-Wide Standards and Collaborative Data Modernization

A public-private model would bring together accreditors, institutions, foundations, research organizations, and policymakers to establish shared definitions and reporting standards for post-graduation outcomes, affordability, and return on investment. Rather than waiting for federal mandate, the sector could voluntarily adopt common metrics and longitudinal aggregation standards to improve comparability and transparency.

This approach could also include structured partnerships to refine ROI methodologies, develop shared dashboards, and pilot responsible data-sharing mechanisms that protect confidentiality (e.g., income bands, aggregated reporting for small programs). The advantage is agility and innovation; the risk is uneven participation without incentives or accountability mechanisms.

IV. A Private Solution: Independent Data Utilities and Institutional Consortia

A private-sector approach would rely on independent data utilities, research collaboratives, or technology intermediaries to aggregate and analyze postsecondary outcomes data across participating institutions. These entities could provide institutions with confidential benchmarking tools, ROI analytics, and student success dashboards while maintaining appropriate data protections.

In this model, institutions voluntarily opt into shared data systems that enable peer comparison and improvement without federal mandate. The strengths of this solution are speed and flexibility; the limitation is that participation may be selective, potentially limiting national comparability and tracking all students to arrive at a more robust conclusion around the value of higher education.



Call to Action

Accreditors are in a unique position to bring the higher-education community together around a shared vision for data that strengthens accountability and continuous improvement across all levels of higher education and tells a more complete story of student success. They already work across boundaries, connecting institutions, states, and federal partners, and they understand how to turn complex information into clear, meaningful standards. Accreditation has always been about trust through quality assurance, and now that trust can extend to the way the nation measures and communicates value. By leading the creation of data definitions and quality metrics, accreditors can help ensure that every student's achievement is visible, comparable, and understood.

Leadership requires support. Building a modern data framework will take time, expertise, and resources. Federal and state agencies, along with nonprofit and philanthropic partners, can make this possible by investing in the systems and training that allow data to serve improvement, not bureaucracy. The work must be done together, with a focus on achievement for all students, clarity, and the stories behind the numbers.

If accreditors lead this effort, the payoff will reach far beyond compliance. Institutions will have the tools to show their impact more clearly. Policymakers will be able to ground decisions in evidence. Accreditors will have better information to prioritize resources toward institutions most in need of improvement. And students and families will gain something invaluable: the confidence that higher education delivers on its promise of opportunity and upward mobility. Accountability will no longer be a burden; it will be proof of purpose.

Conclusion

Accreditors are ready to advance program-level accountability, continuous improvement, and transparency grounded in evidence. Even so, while longer-term data modernization efforts may reshape future accountability systems, institutions and accreditors must continue to make consequential decisions using the data currently available. The absence of complete or perfect information does not eliminate the responsibility to act with rigor, fairness, and transparency in the present. By modernizing data systems, clarifying metric definitions, and aligning them with accreditation standards, higher education can build a transparent, student-centered system where improvement is continuous, trust is restored, and every learner's achievement is visible and valued.

Accountability without data is conjecture. Accountability with data is transformation.



Invited Reviewers

C-RAC wishes to thank the following readers and contributors. Though all their individual feedback was considered, the white paper reflects the views of C-RAC and not necessarily those of the reviewers.

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C-RAC Accreditor Data Use in Action

Accrediting Commission for Community and Junior Colleges (ACCJC)

ACCJC uses a robust set of student achievement outcomes measures to hold institutions accountable to Commission standards and promote institutional transformation. Each year, ACCJC collects and reviews course completion metrics, licensing examination pass rates, job placement rates, graduation rates, and transfer rates, which the Commission reviews against institutions' set standards and stretch goals for key indicators of student achievement. ACCJC uses this data to produce public-facing dashboards that track student achievement and trends across multiple measures and comparable peer institutions over a three-year period. The Commission conducts annual monitoring by generating an internal Index Score calculated from each institution's data. This score is used to identify strengths, challenges, and opportunities in student achievement. Colleges are organized into risk categories with follow-up conducted as necessary.

In 2024, the Commission published [Navigating the Value Landscape for Accreditation](#), which analyzed national efforts to measure the value of higher education and the long-term return on investment (ROI) for students. To support that work, ACCJC has added a publicly accessible ROI metric to institutional dashboards to evaluate how effectively member institutions deliver value. Most recently, the Commission published [Leveraging Program Level Data to Strengthen Student Outcomes: A Framework for ACCJC Institutions](#), offering the Commission's perspective on the growing importance of program-level ROI data in shaping the future of higher education.

Higher Learning Commission (HLC)

HLC has a variety of mechanisms for assessing institutional health, following up on that information as appropriate with institutions, and ensuring that students and the public have robust information about HLC-accredited institutions.

First, HLC assesses the health of member institutions through the [Institutional Update](#), conducted in the first quarter of each year. Through the Institutional Update, HLC collects extensive information about member institutions, including data on finances, enrollment, programs, and locations.

Much of the data from the Institutional Update automatically populates to each member institution's Statement of Accreditation Status in the publicly available [Directory of Institutions](#) on HLC's website. This allows students and the public to have access to extensive information about each HLC member institution.

Additionally, HLC uses the data that institutions provide through various reports, including the Institutional Update, to conduct a [risk-indicator process](#) with three components: Financial

Indicators, Non-Financial Indicators, and—as of 2025—Student Success Indicators. Through the risk-indicator process, HLC identifies when an institution is at risk and takes appropriate action to mitigate the risk.

Information from the Institutional Update can also trigger other accreditation processes. For example, an institution that informs HLC of audit findings will be considered for a form of special monitoring known as an [institutional designation](#), which is another consumer protection mechanism that alerts the public to certain financial situations at institutions.

Also in the interest of transparency, HLC provides other information in the [Directory of Institutions](#) that allows students to gain insight about an institution’s upcoming and in-progress reviews with HLC, as well as recent accreditation history. A new [interactive map](#) provides additional information about all institutional locations.

The [Mark of Accreditation Status](#), which is a graphic identifying an institution’s status with HLC, is another tool HLC uses to promote transparency. The Mark is maintained by HLC and displayed on each institution’s website via an interactive graphic associated with unique code provided by HLC. Through the Mark, visitors to an institution’s website can link back to the institution’s entry in the Directory of Institutions on HLC’s website.

Finally, HLC uses the information collected in its numerous accreditation processes to publish aggregate data reports demonstrating trends across its membership. Examples include [Key Findings of the Application of the Criteria for Accreditation](#) and [HLC Membership by the Numbers](#).

Middle States Commission on Higher Education (MSCHE)

The Middle States Commission on Higher Education (MSCHE) centers data in its work, including monitoring student success measures annually. We offer a public dashboard, a more expansive internal dashboard, and a webpage for the public that offers data about the [State of the Commission](#) reflective of additional data points.

The Commission publishes our [Annual Institutional Update \(AIU\) Dashboard](#), which is public, interactive, and allows for comparison between MSCHE institutions. The AIU is an annual monitoring process for [indicators and metrics](#) in four categories: student achievement, annual enrollment, financial health, and federal financial responsibility. AIU data are aggregated into trends for use in other monitoring and review processes to inform accreditation decision-making. The Commission takes action when institutions fall below established indicators or metrics.

The Commission also internally utilizes a robust Institution 360 (I360) dashboard that displays trend data reflecting data points from a variety of sources, including IPEDS, College Scorecard, Federal Student Aid office, and the NACIQI data set. The dashboard includes trend data for annual enrollment-FTE and 150% graduation rate from the AIU. Data such as headcount enrollments and degrees awarded are pulled from IPEDS. The dashboard also consolidates federal financial responsibility indicators such as HCM status, 90/10 ratio, Federal Composite Score, cohort default rates, and amount of Title IV funds, and pulls additional data from the NACIQI data set, such as median earnings.

Our State of the Commission data webpage serves as another source of readily available data for institutions and the public. This resource includes an overview of Commission activities, composition of the institutional membership, information regarding Commissioners and peer evaluators, and insights into accreditation activities.

As part of our commitment to self-reflection and continuous improvement, our Commission requires that institutions use data to set self-study priorities that inform beneficial outcomes for students resulting from the process.

New England Commission on Higher Education (NECHE)

NECHE maintains dashboards for institutions, peer evaluators, and the Commission, tracking multiple student achievement indicators. NECHE annually monitors student success and achievement outcomes for every institution and requires private institutions to complete an annual financial screen that evaluates wealth, liquidity, cash-flow sufficiency, and market revenue/durability. Institutions falling below thresholds on four or more metrics must submit a report reviewed by CFOs and financial experts. A financial screen for public institutions was launched in Fall 2025. NECHE is also partnering with Georgetown University's Center on Education and the Workforce to develop a return-on-investment dashboard.

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

SACSCOC has developed a comprehensive student achievement data warehouse integrating internal and external sources into actionable institutional insights. A forthcoming dashboard will allow institutions to compare themselves across more than 70 data points and will include new return-on-investment metrics along with a recognition program. SACSCOC conducts annual financial monitoring and has created a ten-factor post-matriculation financial outcomes report with peer comparisons. Its annual reporting system supports a large longitudinal dataset, enabling trend analysis and the identification of at-risk institutions. Each year, SACSCOC also publishes a summary report on frequently cited standards, non-compliance statistics, and major initiatives—including the President's *First 100 Day Plan*, which emphasizes communication, standards revision, process modernization, student achievement measures, and innovation via a "Sandbox for Innovation," with a Second 100 Day Plan forthcoming.

WASC Senior College and University Commission (WSCUC)

WSCUC maintains and continually expands the Key Indicators Dashboard (KID), adding benchmarking against new Carnegie Classifications and a Price-to-Premium Earnings visualization tool that enhances understanding of post-graduate outcomes. Both an undergraduate and a graduate-only version of KID support institutional strategic planning, and WSCUC routinely monitors institutions' post-graduation student outcomes through its Student Outcomes Overview dashboard. WSCUC includes ROI metrics such as earnings by field and credential level and debt-to-earnings ratios. The Commission also conducts yearly financial screening through its Annual Integrated Monitoring exercise, using its Financial Indicators Framework and the Zemsky Stress Test, to identify institutions for follow-up consultation.