



Senate Bill 2335 (Accreditation) Texas Senate Subcommittee on Higher Education

Good morning, my name is Tom Lindsay. I serve as distinguished senior fellow of higher education at the Texas Public Policy Foundation. I am testifying in favor of the bill.

In my view, SB 2335 would accomplish a worthy purpose, one which would benefit all students enrolled in our public universities.

I say this based on the Foundation's research as well as my personal experience in higher education. As provost at the University of Dallas, I was responsible for submitting the school's reaccreditation packet to the Southern Association of Colleges and Schools (SACS).

To begin, accreditors are private entities tasked with ensuring college quality. Their power lies in determining which colleges qualify to allow their students to be able to use Title IV federal financial aid such as Pell Grants and federal loans. As my Foundation colleague, economist Andrew Gillen, recounts in his [recent study of accreditation](#), up until recently, there was a lack of outcomes metrics regarding workforce readiness, causing the accreditation system to be based, not on outcomes, but primarily on inputs.

However, starting in 2019, the U.S. Department of Education began releasing the median earnings of graduates by college and major, following on the Obama administration's College Scorecard. Students and parents can now look up the typical earnings for recent graduates from their exact college and major.

With the new availability of student outcomes data, we can begin to examine whether any accreditors are consistently over or underperforming their peers.

Using debt-to-earnings ratios, Dr. Gillen's study discloses when an accreditor has a higher share of failing programs than its share of all programs in the country, that is, when it is underperforming relative to other accreditors. For example, "if an accreditor accredits 15% of all bachelor's degree programs but accounts for 25% of failing programs in the country, then the accreditor is underperforming," writes Gillen.

Using this metric, Gillen's study finds that the Higher Learning Commission, which accredits 42% of all associate degree programs, accounts for only 30% of failing programs. This Gillen labels "overperforming."

For bachelor's degrees, Gillen finds one overperformer and one underperformer that stand out. The Higher Learning Commission again overperforms, accounting for 36% of all bachelor's degree programs, but only 27% of failing programs. SACS stands out for poor performance, because it accredits 25% of all bachelor's degree programs but accounts for 42% of failing programs.

Regarding master's degrees, yet again, the Higher Learning Commission is the best accreditor, accounting for 32% of master's degree programs but only 23% of failing programs.

Therefore, if accreditation is meant to assure college quality—its founding and overarching purpose—then, given the differences in performance among accreditors, states could improve their colleges by ensuring that their colleges are using the best accreditors. The Higher Learning Commission stands out as the best regional accreditor, based on debt-to-earnings ratios, vastly outperforming its peers in the undergraduate degree categories such as associate and

bachelor's degrees. Because those degrees account for the vast majority of college programs, high performance there should carry a dominant weight.

Gillen's study gives honorable mentions to the New England Commission of Higher Education and the Northwest Commission on Colleges and Universities.

The lowest-scoring regional accreditor is SACS. While Gillen finds that its results for graduate degrees do not raise any red flags, SACS massively underperforms in the bachelor's degree category, the most commonly earned credential.

In Texas, SACS is the historical regional accreditor for the state, which means that most colleges in Texas are currently accredited by the agency with the worst debt-to-earnings ratios.

Fortunately, a change in U.S. Department of Education regulations in 2019 allows the regional accreditors to accredit colleges outside of their traditional regions, essentially making all accreditors national in scope. As we align Texas statutes with the new federal rules, Texas students could benefit through changing to a new higher-performing accreditor.

In this manner, I think SB 2335 improves upon Florida's new approach. Florida public universities now must change accreditors every five years—an onerous task, to be sure, and an unnecessary one when the school is already using a high-performing accreditor.

Under SB 2335, colleges currently accredited by poor performing accreditors would be required to find new accreditation, whereas colleges accredited by a top performing accreditor could renew their accreditation with the same accreditor.

For these reasons, I think SB 2335 offers us the opportunity to help Texas students receive the highest quality education possible.

Thank you. I am happy to answer any questions.

Thomas Lindsay, Ph.D., is the distinguished senior fellow for Next Generation Texas. He has more than two decades' experience in education management and instruction, including service as a dean, provost, and college president.

Lindsay was the director of the National Endowment for the Humanities' (NEH) signature initiative, *We the People*, which supports teaching and scholarship in American history and culture. He was later named deputy chairman and chief operating officer of the NEH.

Lindsay co-authored the American government college textbook *Investigating American Democracy* with Gary Glenn, published by Oxford University Press. He has published numerous articles on the subject of democratic education, many of which have appeared in the world's most prestigious academic journals, including the *American Political Science Review*, the *Journal of Politics*, and the *American Journal of Political Science*.

Lindsay has published articles on higher-education reform in *Real Clear Policy*, *Los Angeles Times*, *National Review*, *Inside Higher Ed*, *Washington Examiner*, *Knight-Ridder Syndicate*, *Dallas Morning News*, *Houston Chronicle*, *American Spectator*, *Forbes*, and *Austin American-Statesman*, among others.

In recognition of his scholarship on democratic education, Lindsay was the 1992-93 Bradley Resident Scholar at the Heritage Foundation in Washington, D.C.

Lindsay earned a Ph.D. and an M.A. in political science and government from the University of Chicago and a B.A. summa cum laude in political science from Northern Illinois University.

