

Oversight of College Quality and Approval of New Colleges by Accreditors in Texas



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Executive Summary

College accreditors play a critical role in U.S. higher education. They are tasked by law with monitoring the quality of colleges and approving colleges for access to large sums of state and federal aid for higher education on which almost all colleges rely.

In this report, we analyze two dimensions of college accreditation in Texas: 1) the degree to which college accreditors disciplined Texas colleges for inadequate student outcomes or faulty academic programming, and 2) the frequency with which college accreditors approved new colleges in Texas over the last 20 years and the nature of those new colleges.

The first section of this paper, which examines accreditors' oversight of academic quality and student outcomes in Texas colleges, finds the following:

- From 2012 to 2021, only 3% of formal actions taken by accreditors toward Texas colleges were undertaken to discipline colleges for poor student outcomes or worrisome academic quality. Throughout this paper, we refer to these accreditor actions as "quality-related disciplinary actions" or "QDAs."
- In Texas colleges, low graduation rates, high student loan default rates, and low earnings outcomes are not correlated with an increase in the likelihood that a college will receive a quality-related disciplinary action from its accreditor.
- Even when accreditors occasionally take quality-related disciplinary action toward Texas colleges, they rarely revoke accreditation. Only 4% of quality-related disciplinary actions taken by accreditors toward Texas colleges, from 2012 to 2021, resulted in a loss of accreditation.

In the second section of the paper, which analyzes the accreditation history and origin of Texas colleges that arose in the last 20 years, we find:

- 83% of Texas colleges approved for accreditation in the last 20 years are for-profit, one-year colleges.
- Texas colleges that received accreditation in the last 20 years enroll a mere 2% of current undergraduates in Texas, and they almost exclusively offer specialized degrees and certificates with narrow student reach.
- 96% of the existing Texas colleges that were approved for accreditation in the last 20 years were approved initially by national accreditors. Regional accreditors, including the Southern Association of Schools and Colleges, which is the regional accreditor most active in Texas, approved almost no new colleges in Texas over the last two decades.

Key Points

- College accreditors rarely take formal action to discipline Texas colleges for poor student outcomes or low-quality academic programming.
- College accreditors almost never approve new colleges in Texas that reach significant numbers of students.
- Texas colleges that received accreditation in the last 20 years educate only 2% of the state's undergraduates.

We hope that our analysis will inform and encourage debate among policymakers and practitioners about how accreditors of Texas colleges can be more active in regulating quality and in approving promising new colleges that might bring better outcomes, innovation, and competition to the sector.¹

Overview of Accreditation

Accreditors arose in the early 20th century as voluntary membership and trade associations of colleges and universities. In this period, accreditors operated privately for the benefit of their members and with no formal role in higher education policy or finance.

In the early 1950s, the Servicemen's Readjustment Act (the "GI Bill") vested legal authority in accreditors to evaluate and approve postsecondary institutions for federal financial aid. Accreditors' legal role as gatekeepers of public aid for higher education expanded rapidly and significantly with the passage of the Higher Education Act (HEA) in 1965 and with the large increase in higher education funding that accompanied it.

Since the passage of the HEA in 1965, American colleges can accept federal financial aid (or qualify for most forms of state-level funding for higher education) only if they are in good standing with an accreditor recognized by the U.S. Department of Education ([Congressional Research Service, 2020](#)).

Accreditation covers all aspects of the design and operation of postsecondary institutions (financial viability, faculty composition, academic programming, governance, etc.). The U.S. Department of Education currently recognizes 60 accreditors. Forty-five of these accreditors—including the seven regional accreditors—grant institutional accreditation, which allows postsecondary institutions to qualify for public aid. The other 15 accreditors are primarily programmatic accreditors that review programs in a particular field (law, dentistry, architecture, etc.).

In this report, we examine the actions of the 26 accreditors that oversee current Texas colleges or approved new Texas colleges over the last two decades.

Accreditor Oversight of Academic Quality and Student Outcomes in Texas Colleges

In this section, we analyze formal oversight actions taken by accreditors toward Texas colleges between 2012 and

2021. We investigate in more detail the subset of these actions that disciplined Texas colleges for low-grade academic programming or poor student outcomes.

Sample Selection, Method, and Error

We rely mainly on data from the Database of Accredited Postsecondary Institutions and Programs (DAPIP; [U.S. Department of Education, n.d.-b](#)) and from the College Scorecard 2021, both of which are databases maintained by the U.S. Department of Education.

Our main sample contains 1,738 records from DAPIP that describe actions taken by accreditors toward Texas colleges between 2012 and 2021.

We arrive at this sample in the following way:

- We start with the full set of 38,920 DAPIP records that describe accreditor actions taken between 2012 and 2021 toward colleges across the U.S. DAPIP has few records prior to 2012.
- We remove 1,134 records that describe accreditor actions directed at graduate schools or at schools for which we could not identify a predominant degree.
- We exclude 4,244 records that involve accreditor actions taken toward non-educational institutions (e.g., hospitals).
- We exclude 1,843 records in which we could not match the college listed in DAPIP with that college's associated data file in the College Scorecard database. We use the College Scorecard for data on accreditation year, enrollment, graduation rates, and a variety of other important college attributes.
- We exclude 29,961 records that describe accreditor actions taken toward colleges not located in Texas.

The resulting sample contains 1,738 actions taken by accreditors toward Texas colleges between 2012 and 2021. These actions were taken by 26 distinct accreditors, and they were directed at 326 accredited Texas colleges, a few of which are branch campuses of larger, statewide institutions.

The opening step of our analysis is to identify the subset of actions in our sample that were disciplinary in nature and

¹ This paper is an empirical analysis of accreditor actions. In a related policy paper, we recommend the formation of new accreditors that focus on new college formation and on strict outcome regulation ([Leschly, 2022](#)).

that focused on the quality of academic programming or student outcomes. In this report, we refer to these actions as “quality-related disciplinary actions” or “QDAs.” To find and classify the QDAs, we rely on the classification of actions as accreditors enter them in the DAPIP, and we apply three filters to the data.

FILTER 1 for Quality-Related Disciplinary Actions. We first sort our sample for accreditor actions that are classified in their DAPIP description field with the label “warning or equivalent – factors affecting academic quality.” This label clearly indicates that an action was both disciplinary and explicitly focused on academic quality. These actions tend to have little additional explanation beyond the description field

We find 9 accreditor actions that meet this first criterion for a quality-related disciplinary action.

FILTER 2 for Quality-Related Disciplinary Actions. As our second filter for surfacing accreditor actions that discipline colleges for academic quality or student outcomes, we scan for actions that meet two criteria:

- **Description criteria:** Actions that have 1 of 18 high-level, preset DAPIP descriptions that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor’s approval of a college).
- **Justification criteria:** Actions that, in addition to having a disciplinary-focused description, have 1 of 3 preset DAPIP justifications that suggest a concern over academic quality or student outcomes.

We find 25 actions that meet this second filter.

FILTER 3 for Quality-Related Disciplinary Actions. Finally, we filter our sample for actions that meet the following two criteria:

- **Description criteria:** Actions that (as in the case of filter 2) have 1 of 18 high-level descriptions that indicate that an accreditor was in some way concerned about a college or moving to sanction it (as opposed to descriptions that indicate an accreditor’s approval of a college).
- **Justification criteria:** Actions that have “other” as their second-level justification and that, in the text field associated with the “other” justification, appear to be actions related to academic programming or

student outcomes. To evaluate these text fields, we read them for plain language meaning and pay particular attention to comments that include keywords related to academic programming or student outcomes (graduation rate, student learning, student progress, etc.). For example, some of these actions had entries in the “other” field that read, “placed on low outcomes monitoring – low graduation rate” or “placed on low outcomes monitoring – low placement rate.”

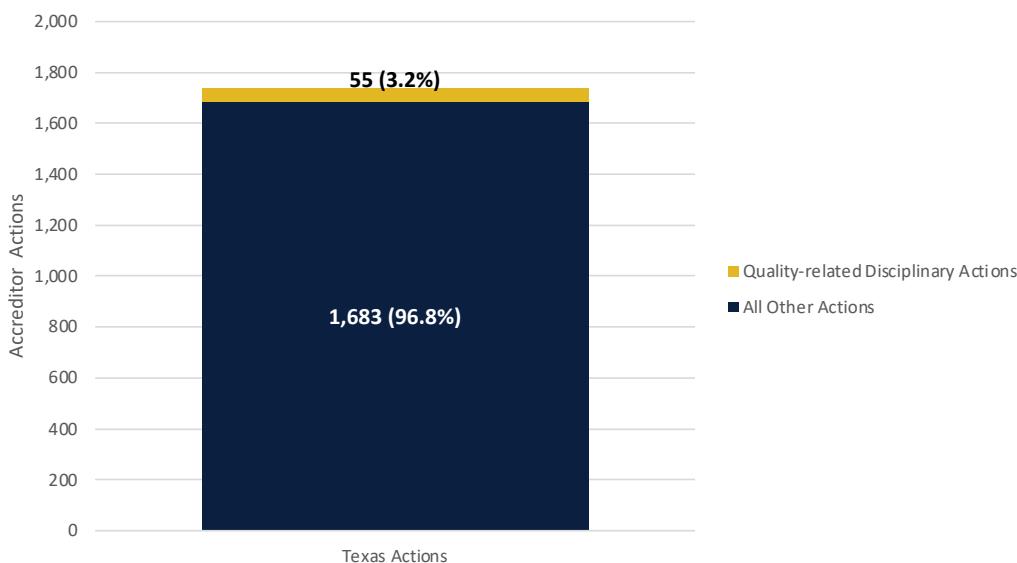
We find 21 actions that meet this third filter.

In all, we can identify 55 actions that meet one of our three standards for quality-related disciplinary action.

Our data and analysis are subject to limitations and error, as follows:

- **Error in Data From the U.S. Department of Education.** The DAPIP data on which we rely are housed at the U.S. Department of Education and self-reported by accreditors. The reliability of the data is subject to the accuracy and completeness of each accreditor’s reporting. Relatedly, we use data from the U.S. Department of Education’s College Scorecard for college-specific data on accreditation year, enrollment, graduation rates, student earnings outcomes, and loan default rates. These data might be incomplete or inaccurate.
- **Error in Identifying Quality-Related Disciplinary Actions.** We identify 55 quality-related disciplinary actions in our sample of 1,738 actions taken by accreditors toward Texas colleges, and we might under-count these actions. That said, we believe that the margin of error in our classification is small. Of the 1,683 accreditor actions that we do not classify as quality-related disciplinary actions, 1,630 (97%) of them are actions about which we have near total confidence in our classification choice because the DAPIP descriptions and justifications on which we rely are intelligible and clear. The remaining 3% (53) of actions that we do not classify as quality-related disciplinary actions are ones where we find their DAPIP descriptions and justifications to be ambiguous or incomplete in some way and where, if we had full information on the action, we might alter our classification. If we were to relabel this last category of actions (i.e., the 53 actions for which DAPIP descriptions and justifications are ambiguous or incomplete) as quality-related disciplinary actions,

Figure 1
Quality-Related Disciplinary Actions as Percent of All Accreditor Actions in Texas (2012-21)



Note. Data from the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://ope.ed.gov/dapip/#/home>) and authors' calculations.

then we would find 6% of actions in our sample (up from 3%) to be quality-related disciplinary actions.

- **No Analysis of Site Visits, Progress Reviews, and Similar Accreditor Activity.** Prior to taking formal action toward colleges, accreditors usually work less formally and more collaboratively with colleges. These activities include site visits and progress reviews, and they often concern matters related to academic programming and student outcomes. We do not observe or analyze these interactions between colleges and their accreditors. We investigate only formal actions taken by accreditors and the degree to which these actions sanction colleges for poor student outcomes or low-quality academic designs.

FINDING 1 OF 6: Accreditors rarely discipline Texas colleges for poor student outcomes or low-quality academic programming.

From 2012 to 2021, accreditors took formal action to discipline Texas colleges for poor student outcomes or worrisome academic programming only 55 times. These

quality-related disciplinary actions accounted for a 3% of all actions (1,738) taken by accreditors toward Texas colleges in the same period.²

FINDING 2 OF 6: Texas colleges rarely incur quality-related disciplinary actions from accreditors.

Only 12% of Texas colleges experienced a quality-related disciplinary action from an accreditor between 2012 and 2021. Among these colleges, 58% were one-year colleges, primarily beauty or barber schools.

FINDING 3 OF 6: Graduation rates in Texas colleges do not predict whether a college will experience a quality-related disciplinary action from an accreditor.

Texas colleges with low graduation rates were not significantly more likely than colleges with high graduation rates to be formally disciplined by an accreditor for their academic quality or student outcomes.³ For example, Texas has 31 colleges with graduation rates below 20%, and 1 (3%) of them incurred a quality-related disciplinary action from an accreditor between 2012 and 2021.

² This finding repeats across all U.S. accreditors. Nationally, 2.7% of formal oversight actions taken by U.S. accreditors are quality-related disciplinary actions ([Leschly & Guzman, 2022](#)).

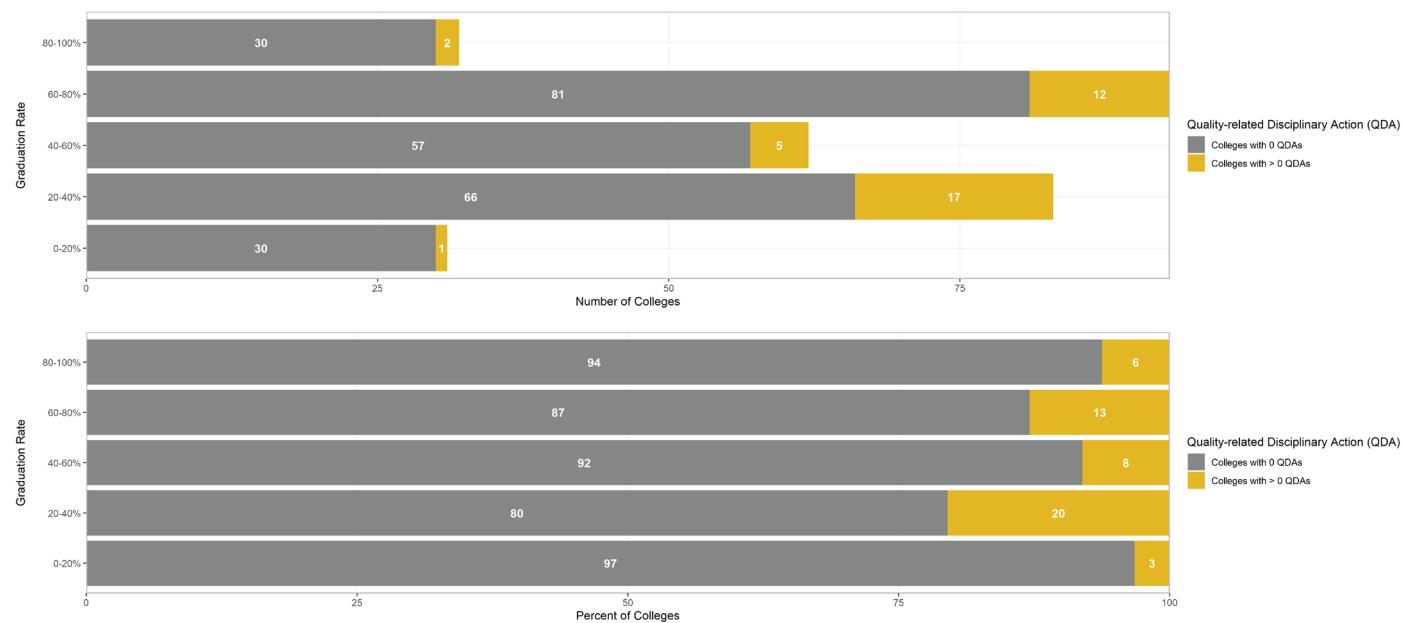
³ Graduation rates are the percent of first-time, full-time students who complete an associate degree in less than three years or a bachelor's degree in less than 6 years. Graduation rates are for students entering 4-year colleges in the fall of 2013 and for students entering 2-year colleges in the fall of 2016.

Table 1
Texas Colleges Receiving a Quality-Related Disciplinary Action From an Accreditor (2012-22)

	Public	Private Nonprofit	Private For-profit	Total
1 Year College	0	2	21	23
2 Year College	4	1	2	7
4 Year College	5	5	0	10
Total	9	8	23	40

Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Figure 2
Quality-Related Disciplinary Actions Directed at Texas Colleges, by Graduation Rate (2012-21)



Note. The charts above include data on 301 one-year, two-year, and four-year colleges in Texas for which the U.S. Department of Education publishes graduation rates. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

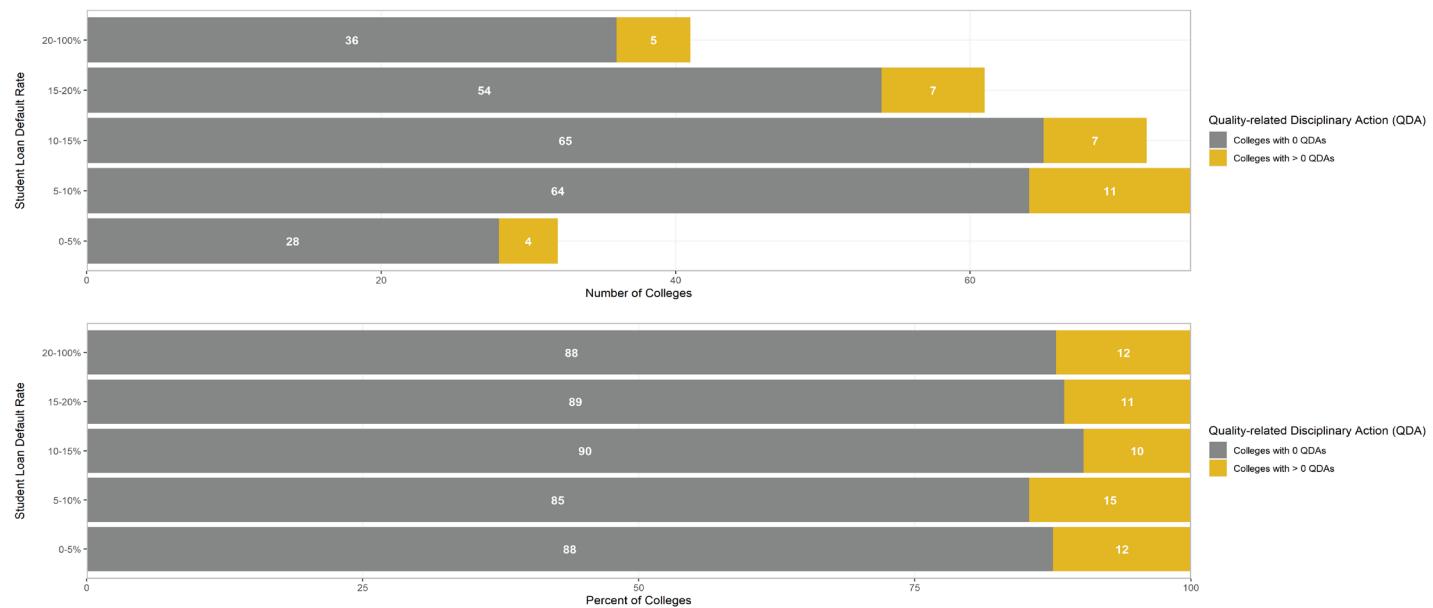
FINDING 4 OF 6: Loan default rates in Texas colleges do not predict whether a college will experience a quality-related disciplinary action from an accreditor.

Texas colleges with high loan default rates were not significantly more likely than colleges with low default rates to be formally disciplined by an accreditor for their academic quality or student outcomes.⁴

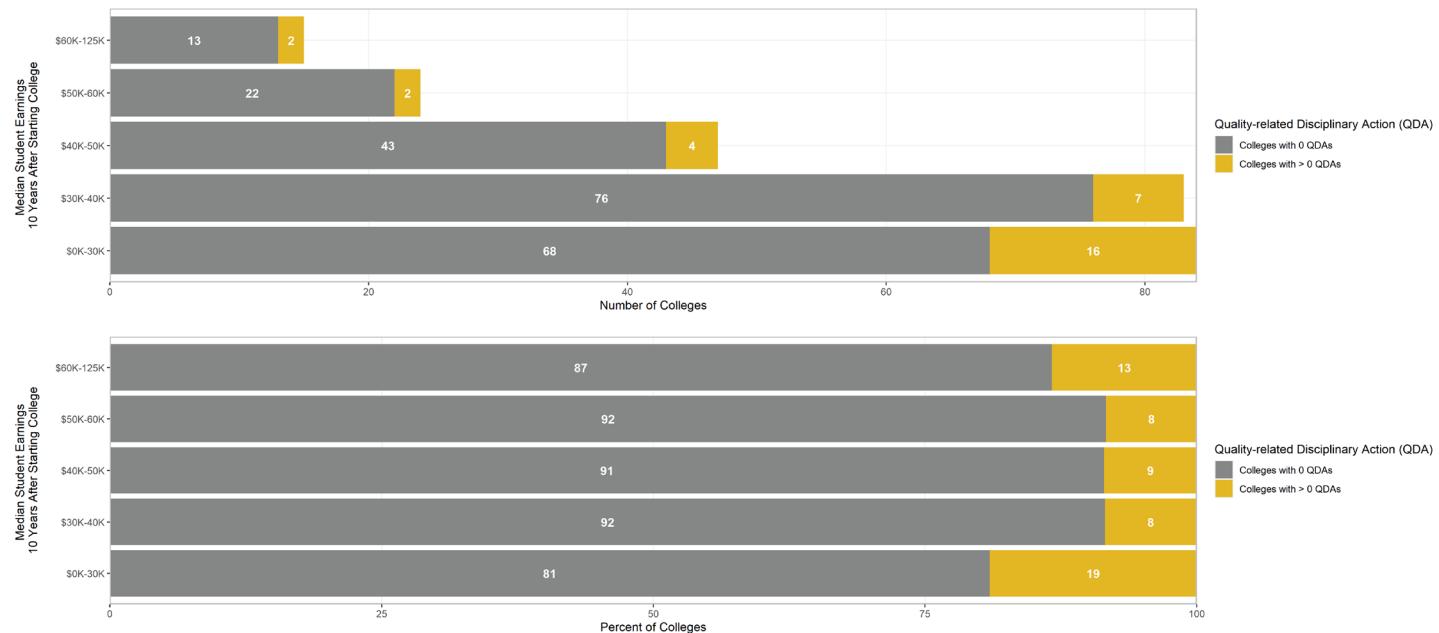
FINDING 5 OF 6: Earnings outcomes of Texas colleges do not predict whether they will experience a quality-related disciplinary action from an accreditor.

In Texas colleges, variation in median earnings for students 10 years after they start college does not predict significantly whether accreditors will sanction a college for poor outcomes or low-grade academic programming.

⁴ Student loan default rates are the percentage of a school's borrowers who default within three years of entering repayment on various federal loans. The data include all borrowers who entered repayment in 2017 and defaulted in 2017, 2018, or 2019.

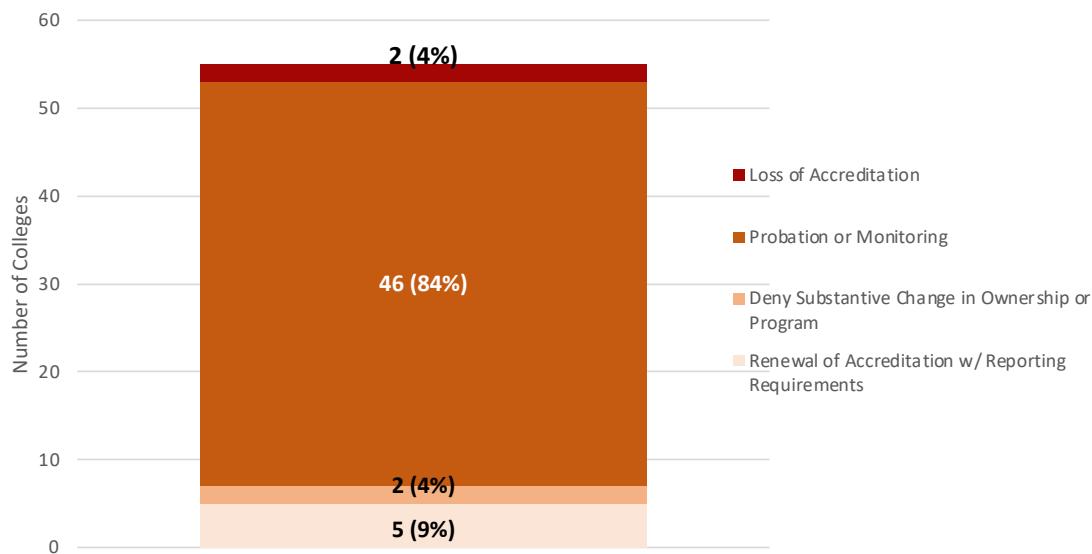
Figure 3*Quality-Related Disciplinary Actions Directed at Texas Colleges, by Loan Default Rate (2012-21)*

Note. The charts above include data on 281 one-year, two-year, and four-year colleges in Texas for which the U.S. Department of Education publishes student loan default rates. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Figure 4*Quality-Related Disciplinary Actions Directed at Texas Colleges, by Earnings Outcomes (2012-21)*

Note. The charts above include data on 253 one-year, two-year, and four-year colleges in Texas for which the U.S. Department of Education publishes earnings outcomes. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Figure 5
Severity of Quality-Related Disciplinary Actions Directed at Texas Colleges (2012-21)



Note. Data from the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://ope.ed.gov/dapip/#/home>) and authors' calculations.

For example, among the 167 colleges in Texas that fall in the low range of median student earnings 10 years after enrollment (i.e., colleges where a median student earns less than \$40,000 a decade after enrollment), 14% of colleges experienced a quality-related disciplinary action. The equivalent statistic for all Texas colleges, including ones with exceptionally high earnings outcomes, is almost identical (12%).

FINDING 6 OF 6: Quality-related disciplinary actions directed at Texas colleges rarely result in a loss of accreditation.

On the rare occasion that accreditors discipline Texas colleges for poor academic designs or poor student outcomes, accreditors rarely revoke a college's accreditation entirely. Specifically, only 4% of quality-related disciplinary actions taken by accreditors toward Texas colleges from 2012 to 2021 resulted in a loss of accreditation. The other 96% of these actions involved less severe interventions, usually ones that put a college on probation or into monitoring.

Analysis of New College Accreditation in Texas

In this section, we analyze current Texas colleges for when they were accredited, and we examine which accreditors were most active in approving new colleges. We focus our analysis on Texas colleges that received accreditation in the last 20 years.

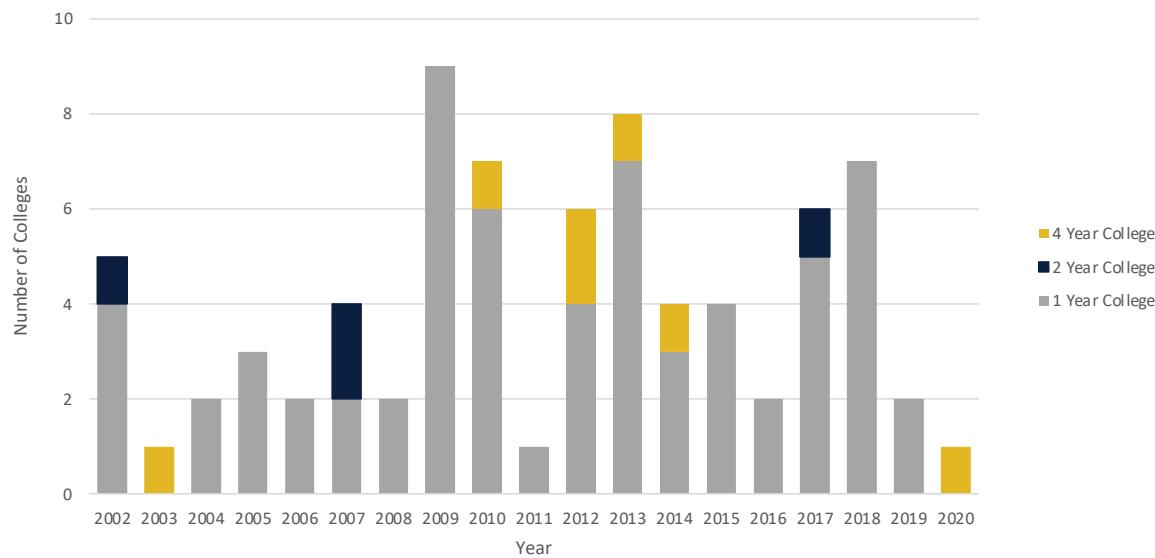
Sample Selection, Method, and Error

Our sample in this section contains 289 current Texas colleges that, according to the College Scorecard, have Title IV-enabling accreditation. In this analysis, we count only main campuses, and we do not treat branch campuses as unique institutions. Twenty-five colleges in Texas have branch campuses.

We rely on data from the U.S. Department of Education's College Scorecard for college-specific data on accreditation year, enrollment, graduation rates, student earnings outcomes, and loan default rates. These data might be incomplete or inaccurate.

We only examine the accreditation origin and characteristics of existing Texas colleges, and an analysis that includes recently closed colleges might result in different findings.

Figure 6
Texas Colleges Accredited in the Last 20 Years, by Type and Year of Accreditation



Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Table 2
Texas Colleges Accredited in the Last 20 Years, by Type

	Public	Private Nonprofit	Private For-profit	Total
1 Year College	0%	3%	83%	86%
2 Year College	1%	0%	4%	5%
4 Year College	3%	5%	1%	9%
Total	4%	8%	88%	100%

Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

FINDING 1 OF 3: 26% of current Texas colleges were accredited in the last 20 years, and they are mostly one-year, for-profit colleges.

Texas has 289 current colleges, and 76 (26%) of them received accreditation the last 20 years. Of these 76 recently accredited colleges, 65 (86%) are 1-year colleges, 67 (88%) are for-profit colleges, and 63 (83%) are both for-profit and 1-year institutions.⁵

FINDING 2 OF 3: Current Texas colleges that were accredited in the last 20 years enroll 2% of Texas undergraduates and offer mainly specialized degrees with narrow student reach.

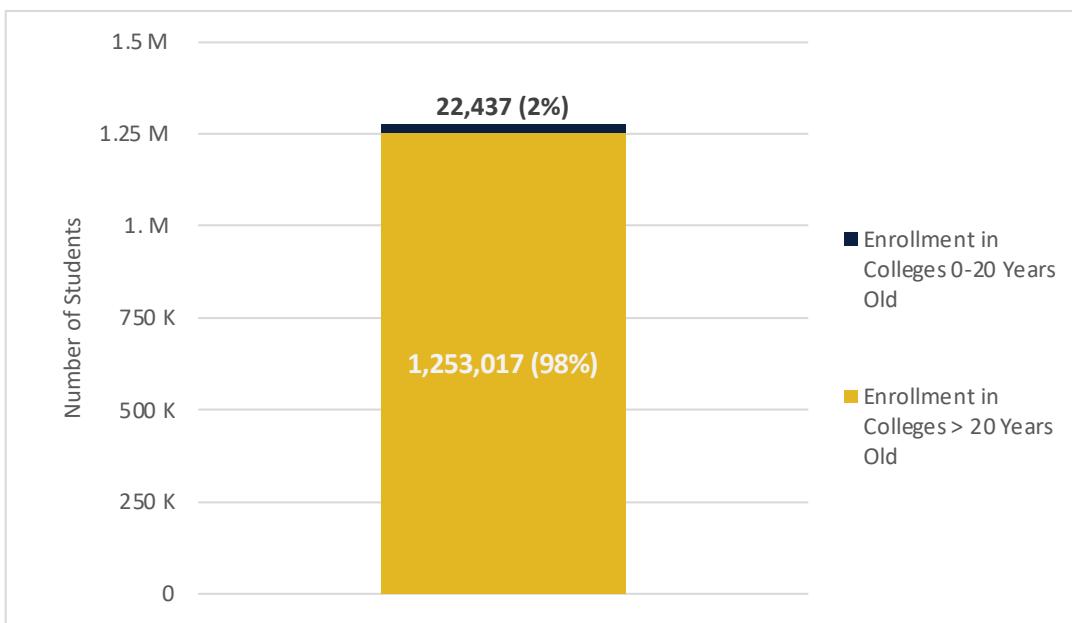
Texas colleges enroll approximately 1.3 million undergraduates. Only 2% of these students attend colleges that received accreditation in the last 20 years.⁶

Recently accredited colleges in Texas enroll few students because they almost exclusively offer highly specialized

⁵ A full list of current Texas colleges that received accreditation in the last 20 years can be found [here](#).

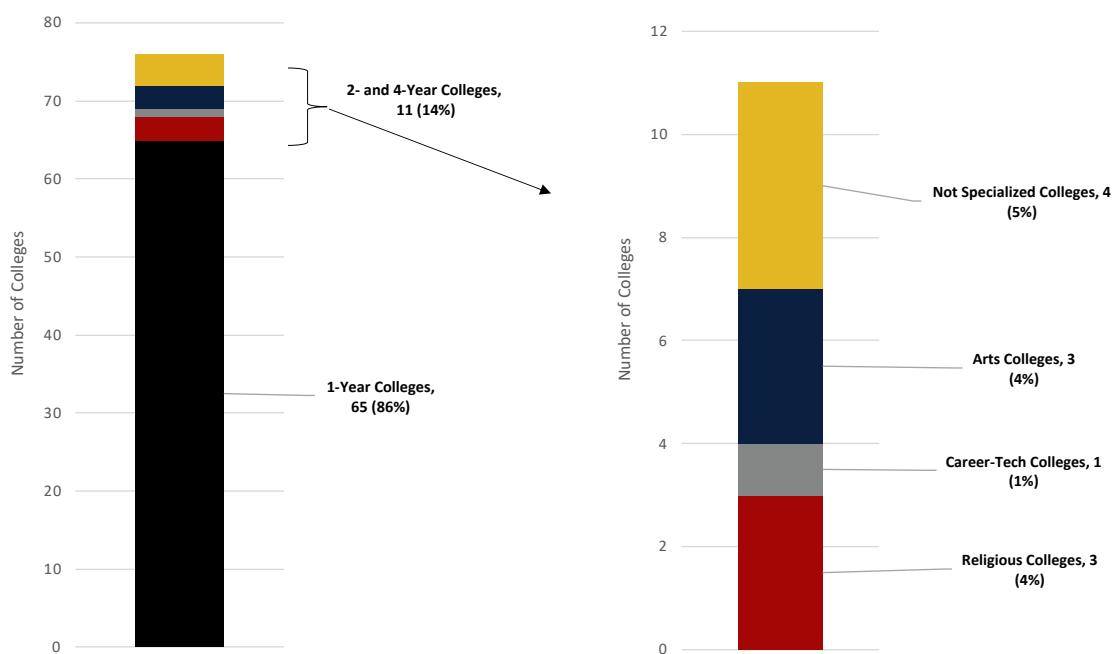
⁶ This enrollment count is from the fall of 2019, and it includes all undergraduate degree or certificate seekers enrolled in Texas colleges (*College Scorecard*, n.d.-a and authors' calculations).

Figure 7
College Enrollment in Texas by Age of College



Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Figure 8
Degree Specialization of Texas Colleges Accredited in Last 20 Years



Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

Table 3*Texas Colleges Accredited in the Past 20 Years, By Accreditor*

	Public Colleges				Private Non-profit Colleges				Private For-profit Colleges				All Colleges			
	4YR	2YR	1YR	All	4YR	2YR	1YR	All	4YR	2YR	1YR	All	4YR	2YR	1YR	All
National Accreditors																
National Accrediting Commission of Career Arts and Sciences, Inc.	0	0	0	0	0	0	0	0	0	0	32	32	0	0	32	32
Council on Occupational Education	0	0	0	0	0	0	2	2	1	0	23	24	1	0	25	26
Accrediting Commission of Career Schools and Colleges	0	0	0	0	0	0	0	0	0	2	2	4	0	2	2	4
Other National	0	0	0	0	4	0	0	4	0	1	6	7	4	1	6	11
All National Accreditors	0	0	0	0	4	0	2	6	1	3	63	67	5	3	65	73
Regional Accreditors																
Southern Association of Colleges and Schools, Commission on Colleges	2	1	0	3	0	0	0	0	0	0	0	0	2	1	0	3
Other Regional	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
All Regional Accreditors	2	1	0	3	0	0	0	0	0	0	0	0	2	1	0	3
All Accreditors	2	1	0	3	4	0	2	6	1	3	63	67	7	4	65	76

Note. Data from *College Scorecard* (data set) and the *Database of Accredited Postsecondary Institutions and Programs* (data set), U.S. Department of Education, n.d. (<https://collegescorecard.ed.gov/data/> and <https://ope.ed.gov/dapip/#/home>) and authors' calculations.

degrees with narrow student relevance. This is true for one-year, two-year, and four-year colleges accredited in the last two decades.

FINDING 3 OF 3: Almost all Texas colleges have been approved by national accreditors.

National accreditors were almost entirely responsible for granting accreditation to Texas colleges that arose in the last 20 years. Specifically, 96% of current Texas colleges that won accreditation in the last 20 years were approved by national accreditors.

Regional accreditors, including the Southern Association of Colleges and Schools (SACS), which is the dominant accreditor in Texas, granted accreditation to only 3 of the 76 Texas colleges that arose in the last two decades.

Conclusion

Texas colleges serve over one million undergraduates, and their accreditors have enormous authority and responsibility to regulate them for quality. Accreditors also control the entry of new and potentially promising colleges into Texas' system of higher education.

Unfortunately, according to our analysis, accreditors of Texas colleges appear to have abdicated their role as regulators of college quality. They refrain almost entirely from disciplining Texas colleges for poor student outcomes or worrisome academic programming. We find it implausible that accreditors are acting optimally and regulating colleges responsibly when only 3% of their formal oversight activity

disciplines colleges for poor academic programming or low student outcomes. Moreover, they show little interest in accrediting new colleges with broad student reach.

We hope our findings will inform and motivate debate among accreditors and higher education policymakers about how to strengthen accreditor oversight of college quality in Texas and about how to make accreditors more receptive to new colleges that seek to serve large student populations in Texas and to bring innovation, competition, and improved outcomes to the sector.★

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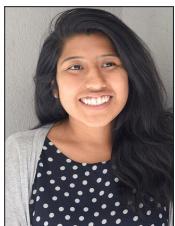
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Notes

ABOUT THE AUTHORS



Stig Leschly is the CEO of College101. He is also a senior lecturer at Harvard Business School where he teaches and writes about entrepreneurship and higher education policy and practice. Formerly, Stig was the CEO of Match Education, an education-related nonprofit that runs charter schools and trains teachers. Early in his career, Stig was a high-tech entrepreneur and an executive at Amazon.com. He is also a founder, former CEO and current board chair of Duet.org (a hybrid college that operates in partnership with Southern New Hampshire University) and of Fishtank Learning (a provider of open-source curriculum for K-12 schools). Stig has a JD-MBA from Harvard and BA from Princeton.



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College101 is a non-profit organization dedicated to creating a movement of innovative, new colleges that create economic mobility for students and that are willing to be held accountable for doing so. Find us at www.college101.org.

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