



February 9, 2023

**DOCKET ID ED 2022-OUS-0140**

Office of the Under Secretary  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202  
**VIA: [www.regulations.gov](http://www.regulations.gov)**

Dear Under Secretary Kvall:

The Middle States Commission on Higher Education (MSCHE) appreciates the opportunity to provide comment in response to the Department's Request for Information regarding public transparency for low-financial-value postsecondary programs, Docket ID: ED-2022-OUS-0140, Federal Register Number 2022-28606, January 11, 2023. Our agency has also encouraged institutional representatives to submit comment in response to this request through one of our advocacy alerts.

As you are aware, MSCHE is a voluntary, non-governmental institutional accreditor that has been recognized by the United States Secretary of Education since 1952. As a member of the regulatory triad, the Commission remains a partner in efforts at strengthening institutional accountability and consumer protection and appreciates this opportunity to comment generally on this request for information.

As an institutional accreditor for 517 institutions, MSCHE assures students and the public of the educational quality of higher education. The Commission's accreditation process ensures institutional accountability, self-appraisal, improvement, and innovation through peer review and the rigorous application of standards within the context of institutional mission. Although MSCHE is an institutional accreditor, programmatic data, along with institutional data, is important during the peer review process. For example, during the self-study evaluation, the institution must upload data and evidence into an evidence inventory to demonstrate compliance with standards for accreditation, requirements of affiliation, policies and procedures, and applicable federal regulatory requirements. The evidence inventory is a well-organized and referenced repository of data, documents, policies, and procedures. The Commission requires that institutions provide data related to the cost of attendance, expenses, debt and earnings as documentation to demonstrate compliance with *Standard IV: Support of the Student Experience*. The Commission also requires public disclosure of accurate and comprehensive information regarding expenses, financial aid, scholarships, grants, loans, repayment, and refunds under *Standard II: Ethics and Integrity*. The Commission relies heavily on data in other accreditation activities as well.

We appreciate the continued opportunities to collaborate with the Department to explore appropriate federal data that when combined with accountability systems can drive continuous improvement and more equitable outcomes. As an accrediting agency working closely with data,

we too continue to refine the indicators which lend best to the evaluation of institutional quality and contribute to educational excellence. We, as a quality assurance agency, remain committed to transparency and empowering students with information; however, we also recognize that context that helps explain the data is important. This is particularly true with publicly available data that is imperfect and could easily be misinterpreted. Because all members of the regulatory triad are already collecting and using data from institutions, MSCHE encourages the Department to consider the overall framework for using data to inform the public and to hold institutions accountable. This should also be done with a lens toward reducing both duplication of effort and additional data reporting burdens.

Please contact me if I can provide any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather F. Perfetti", is positioned below the word "Sincerely,".

Heather F. Perfetti, J.D., Ed.D.  
President