What Commission Action Letters Reveal

A Thematic Analysis of WSCUC Decisions (2012-2024)

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Introduction

In the United States, quality assurance is directly tied to the accreditation process. Agencies overseen by the National Advisory Committee on Institutional Quality and Integrity (NACIQI) and the US Department of Education (ED) control the ability of higher education institutions to participate in Title IV financial aid programs, which provide billions of dollars in funding per academic year. Losing accreditation can jeopardize an institution's ability to operate and serve students. Beyond its regulatory function, the accreditation process provides a window into the changing landscape of higher education. By analyzing the decisions that accreditors record in their formal action letters, we can identify the most common issues that institutions face and the priorities that shape accreditors' decisions.

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This paper builds off a series of earlier studies conducted by Ithaka S+R, on how NACIQI influences the accreditation system, a comparative analysis of written accreditor standards, and a study of how accreditors are using new data-driven practices to center student outcomes in their reviews. While those studies help clarify the expectations accreditors set and the tools they use to monitor institutions, here we turn our attention to the issues most commonly cited when accreditors make decisions about an institution's accreditation status.

In this study, we focus on the Western Association of Schools and Colleges Senior College and University Commission (WSCUC) and their published set of Commission Action Letters. These letters are formal notices that communicate the Commission's accreditation decisions and outline any required areas for improvement. WSCUC publishes all of their commission action letters, providing an opportunity to systematically analyze the areas most cited by the accreditor during the review process. While all accreditors publish notices of their decisions, WSCUC is unique in maintaining a complete, publicly accessible archive of action letters, which makes this type of systematic analysis possible.

Using this archive, we analyze the full set of Commission Action Letters that WSCUC has made public to understand which issues most often surface during reviews, how often different types of actions are assigned, and which standards the Commission cites when it requires follow-up or signals more serious concern. In particular, we seek to understand the differences in how often student outcomes and student success are brought to the forefront of the review process relative to standards related to other areas. Because action letters distill the accreditation review into a concise summary of strengths, concerns, and required next steps, they provide a practical way to see how the standards function in real accreditation decisions.

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Commission Action Letters in context

At WSCUC, the accreditation process follows a multi-stage review process. Institutions engage with WSCUC through several types of reviews, including candidacy, initial accreditation, and reaffirmation. Reaffirmation is the most common, since it applies to institutions that already hold accreditation and are undergoing their regular, cyclical review. Institutions seeking reaffirmation complete a multiyear review process that begins with the preparation of an Institutional Report, which serves as the self-study demonstrating compliance with WSCUC's Standards. A peer review team conducts an offsite review of the Institutional Report and supporting evidence and identifies issues for further examination. The team then visits the campus to meet with stakeholders, follow up on questions raised during the offsite stage, and prepare a Team Report summarizing findings and offering recommendations for institutional improvement. The institution may submit a response to the Team Report to clarify findings,

correct factual errors, or provide additional evidence or context before the Commission makes its final decision.[1]

WSCUC, like all accreditation agencies, is governed by a Commission of appointed members who serve as the agency's decision-making body. The Commission votes on accreditation decisions and then issues action letters to announce those decisions to the institution and the public. In the review process described above, the Commission reviews all the materials prepared and submitted up to this point, including institutional and team reports, any institutional responses to the team report, and other relevant documents. At WSCUC, the Commission may reaffirm the institution's accreditation for up to 10 years. Alternatively, the Commission may issue a Formal Notice of Concern if an institution is found to be *in danger* of being out of compliance with one of their standards, or a sanction such as Warning, Probation, or Show Cause when an institution is *found* out of compliance with one or more standards. In rare cases accreditation may be withdrawn, and a process of appeals may follow.

The Commission's decisions on accreditation are communicated through Commission Action Letters. Letters include the action taken by the Commission, the justification for the decision, the length of the accreditation period, any special conditions or restrictions, and any required follow-up. A typical reaffirmation letter might include a set of commendations that highlight institutional strengths or accomplishments, and areas that the Commission requires the institution to respond to, which are tied to specific standards. Even when accreditation is reaffirmed for the maximum 10-year period, areas of improvement are identified.

For example, the letter sent to California State University, Los Angeles in 2019, reaffirmed its accreditation for 10 years and commended its progress on improving graduation and retention rates, but it also cited standard 2.10 as an area for continued improvement as the institution continues to make progress towards increasing its retention and graduation rates.[2] Letters may also require follow-ups, such as interim reports, special visits, or mid-cycle reviews to address the identified

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[1] WASC Senior College and University Commission, *2013 Handbook of Accreditation*, (Alameda, CA: WASC Senior College and University Commission, 2013, revised November 2021), https://www.wscuc.org/handbook2013/.

[2] "Commission Action Letter: California State University, Los Angeles," WASC Senior College and University Commission, July 12, 2019, https://wascsenior.app.box.com/s/ul3uv0w3q518nrauuq5c145qhpwj1uly.

issues. For instance, in a letter to the Academy of Art University, the Commission granted reaffirmation to the institution and listed issue areas connected to specific standards but also issued a Formal Notice of Concern and scheduled a special visit.[3]

Under WSCUC's public disclosure policy, action letters and team reports for accredited and candidate institutions are posted on the WSCUC website shortly after institutions are notified.[4] WSCUC has made these items public since June 2012 and considers them foundational for institutional accountability and improvement. This transparency provides the basis of our analysis. Because Commission Action Letters distill the accreditation review into a formal record of actions, concerns, and follow-ups, they offer a systematic view of how the Commission applies its standards in practice and in what areas it expects institutions to improve. By analyzing Commission Action Letters, we can see which types of standards are most often cited in letters, and which areas for follow-up are typically required.

Data collection and analytic approach

Our analysis draws on Commission Action Letters issued by WSCUC between 2012 and 2024, which have been made publicly available for accredited and candidate institutions on its website. We constructed our dataset by reviewing the institutional directory online and following links to the full archive of posted action letters for each institution. Because WSCUC posts action letters only for institutions that currently hold accreditation or candidacy, our sample excludes institutions whose accreditation was fully withdrawn before the time of data collection. The dataset therefore represents the universe of publicly available

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[3] "Commission Action Letter: Academy of Art University," WASC Senior College and University Commission, July 7, 2014, https://wascsenior.app.box.com/s/vofi6mmzjko6ei9xlbz0.

[4] "Public Disclosure of Accreditation Documents and Commission Actions Policy," WASC Senior College and University Commission, approved February 2013; revised November 2013, November 2016, June 2019, and June 2021, https://wascsenior.app.box.com/s/k2ztqdsvsvenb9g1b39t.

Commission Action Letters for institutions accredited by WSCUC during this period.

For each institution, we downloaded every available action letter and recorded the year and month of issuance. For each letter, we then coded five key attributes: (1) the primary reason for the letter (for example, reaffirmation, special visit, or initial accreditation); (2) the actions taken by WSCUC, including up to three actions when multiple decisions were recorded; (3) whether the Commission required a special visit as follow-up; (4) whether the Commission required an interim, progress, or mid-cycle report; and (5) the standards cited as areas for improvement or as almost or fully out of compliance in the recommendations section of the letter. Letters related to routine administrative changes, like structural change reviews, were excluded unless the letter identified specific areas of improvement tied to WSCUC standards. These structural change letters differ in format and purpose from the regular review cycle and rarely cite standards in a way that can be used for descriptive analysis.

Because our analysis references the standards in WSCUC's 2013 Handbook of Accreditation, we restrict the analytic dataset to letters issued in 2014 or later. All institutions present in the WSCUC directory as of July 2024 are included, and institutions that changed names are referred to by their current institutional name, as this is how they appear in the directory, though earlier letters may reference an older name.

WSCUC began publishing letters in 2012, and we downloaded all available letters for completeness, but letters issued prior to 2014 reference the 2008 Handbook of Accreditation and do not align with the framework of our analysis. Earlier letters remain a part of our dataset, and information about accreditor actions and standards referenced as areas of improvement were recorded, but they are not included in the descriptive analysis findings. Our final dataset contains 491 letters addressed to 200 distinct institutions.

For institutions with an active IPEDS UNITID, we merged the most recent IPEDS directory variables to identify institutional control (public vs. private). For institutions without UNITIDs, we referenced the institution's website to verify the correct value for institutional control. WSCUC does not accredit two-year institutions, so all schools are four-year or professional.

Coding actions

We recorded information on each letter based on the reason it was issued, which most often includes reaffirmation reviews, special visits, and reviews related to candidacy or initial accreditation. Actions taken by the Commission range from reaffirmations and continuations of accreditation to more serious decisions such as issuing a Notice of Concern or imposing a formal sanction. To categorize the actions more broadly for descriptive purposes, we placed each individual action into a positive, negative, or neutral category. Positive actions generally include reaffirmation or continuation of accreditation. Negative actions include notices of concern, sanctions, or letters signaling potential non-compliance.

After each individual action is coded, we then coded the overall letter based on the most serious action it contains. If a letter includes multiple actions and any are negative, the negative action takes precedence when we categorize the letter. So, when an institution receives a continuation of accreditation decision but is also issued a formal notice of concern, the letter is coded as negative. In these cases, the institution is still being cited as out of compliance or almost out of compliance with WSCUC standards, even if accreditation is continued. Similarly, even when an institution has technically improved its standing by moving from one sanction to a less-severe sanction, or from a sanction to a notice of concern, we still categorize that letter as negative.

Coding standards

WSCUC's 2013 Standards of Accreditation consist of four overarching Standards and 41 Criteria for Review (CFR). Each Standard has multiple CFRs nested within it, which serve as the specific evaluative requirements an institution must meet to receive accreditation. In this report we refer to both the overarching Standards and the CFRs simply as standards. For each letter we recorded the standards referenced as areas of improvement or concern in the recommendations section of the letter. When institutions receive a notice of concern or sanction, we record the standards specifically identified in the letter as in danger of non-compliance or out of compliance.

By definition, a notice of concern is issued by the Commission when an institution is at *risk* of being in non-compliance with at least one of WSCUC's standards. A sanction is issued when at least one standard is already out of compliance. When an entire Standard is referenced as in danger of non-compliance it is often difficult to determine which specific areas are at issue. In those cases, we rely on the detailed "areas for improvement" section of the letter, which offers specific CFRs. For example, in a 2017 Special Visit letter sent to the Academy of Art University, the Commission listed Standards 2, 3, and 4 as being in danger of non-compliance, but elsewhere in the letter identified CFRs 3.6, 3.7, 3.10, 2.10, and 4.6 as areas requiring improvement. We lean on these specific citations for our analysis.[5]

To support the descriptive analysis, we grouped the 41 standards (or CFRs) in the WSCUC 2013 Handbook into eight broad themes. These themes reflect the major areas that appear in the handbook: academic quality, student outcomes and success, student experience, institutional integrity, faculty and staff, financial responsibility, governance and leadership, and planning and continuous improvement. By categorizing standards into these themes, we can consistently measure how often different types of concerns are cited in Commission Action Letters.

In our earlier study on accreditor standards, we organized WSCUC's 41 standards from their 2013 Handbook (as well as multiple sets of standards from six other accreditors) into a different structure of 10 themes and allowed individual standards to appear in more than one sub-theme.[6] The purpose of that analysis was to capture the full range of issues addressed by accreditors across multiple handbooks, and the variation in standards across multiple accreditors warranted a more expansive framework. For the analysis in this paper, however, we assign each standard to only one theme so that the categories are mutually exclusive and better suited to comparing positive and negative actions, special-visit requirements, and other outcomes.

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[5] Generally, these standards refer to governance and leadership, student outcomes and success, and institutional planning and continuous improvement. See the WSCUC 2013 standards for more specific language: https://www.wscuc.org/handbook2013/.
[6] Cameron Childress, "Regional Accreditation Standards: A New Framework for Comparison," *Ithaka S+R*, February 12, 2026, https://sr.ithaka.org/publications/regional-accreditation-standards/.

The eight themes used in this analysis therefore draw from the same underlying standards but are organized differently to meet the needs of this descriptive analysis and the narrower scope. A brief table that maps how the two frameworks relate is provided in the appendix.[7]

In the sections that follow, we describe the distribution of letter types and actions, then examine which standards and themes are most frequently cited, and how often student outcomes appear relative to other areas of concern.

Findings

Characteristics of Commission Action Letters

Our first set of findings focuses on why WSCUC issued these letters and the actions the Commission recorded in them. The tables and figures in this section show the reasons letters were issued, the actions taken by the Commission, our categorization of those actions as positive, negative, or neutral, and the overall distribution of these categories.

Reaffirmation reviews make up the largest share of letters in the sample, followed by special visits, initial accreditation reviews, and candidacy reviews. Special visits can be triggered during any review type and indicate an increased level of follow-up from WSCUC to ensure institutions address the issues identified in a prior letter. After conducting a special visit, the Commission issues a letter summarizing its assessment and outlining any next steps.

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[7] The framework in the appendix shows how the 41 WSCUC standards align with the eight themes used in this analysis. The sub-themes listed in the appendix come from our earlier study of accreditor standards and make up the ten major themes used in that work. Here, we include a guide showing how each of those sub-themes maps to the eight themes used in this analysis, so readers can see how the two frameworks relate.

Table 1. Distribution of Commission Action Letters by Reason for Letter

Reason for letter	Count	▼ Percent
Reaffirmation	185	42%
Special Visit	134	31%
Initial Accreditation	58	13%
Candidacy	34	8%
Educational Effectiveness Review	12	3%
Structural Change	8	2%
Withdrawal Review	5	1%
Interim Report	2	0%

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Table 2 summarizes the actions taken by the Commission and how we categorized each action. As a reminder, some letters contain multiple actions, so those actions are treated independently in the table below. We classify deferments of action as neutral. Reaffirmation and continuation of accreditation are the most common positive actions, while formal notices of concern represent the most common negative actions. WSCUC distinguishes between reaffirmation of accreditation, which is awarded at the conclusion of a full review cycle, and continuation of accreditation, which typically indicates that accreditation remains in place while additional monitoring or follow-up is required.

Table 2. Frequency of Commission Actions and Assigned Action Categories

Accreditor Action	Action Category	Count	▼ Percent
Reaffirm Accreditation	Positive	182	39%
Continue Accreditation	Positive	81	17%
Grant Initial Accreditation	Positive	55	12%
Grant Candidacy	Positive	31	7%
Formal Notice of Concern	Negative	30	6%
Remove Notice of Concern	Positive	20	4%
Defer Action	Neutral	10	2%
Placed on Warning	Negative	9	2%
Continue Formal Notice of Concern	Negative	7	1%
Removal of Warning	Positive	7	1%
Remove Probation	Positive	6	1%
Continue Candidacy	Positive	4	1%
Continue Order to Show Cause	Negative	4	1%
Continue Warning	Negative	4	1%
Impose Probation	Negative	4	1%
Approval of Structural Change	Positive	3	1%
Withdraw Accreditation	Negative	3	1%
Continue Probation	Negative	2	0%
Order of Show Cause	Negative	2	0%
Approve Change of Ownership	Positive	1	0%
Change of Control	Positive	1	0%
Deny Extension of Accreditation	Negative	1	0%
Extend Warning	Negative	1	0%
Grant Good Cause Accreditation Extension	Positive	1	0%
Schedule Comprehensive Review	Negative	1	0%
Suspend General Degree-Granting Approval	Negative	1	0%

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As a reminder, when a letter contains any negative action, we classify the entire letter as negative. Figure 1 shows the share of letters falling into each action category.

Figure 1. Share of Commission Actions by Action Category

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Institutions receiving letters

Table 3 provides an overview of the institutions represented in the analytic sample. This includes a breakdown of institutions by control and the total number of letters associated with each group. Because not all institutions receive each type of Commission Action Letter, the denominators in the following figures vary depending on the action or follow-up that is analyzed. Where it is helpful for interpreting percentages, we note the size of each subgroup throughout the findings.

The post-2013 sample is largely composed of private not-for-profit and public institutions. We observe a lower percentage of letters associated with public institutions than their share of the sample overall, roughly proportional representation for not-for-profit institutions, and a slightly higher proportion of letters sent to for-profit institutions relative to their representation in the sample.

Table 3. Institutions in the Sample, by Control and Number of Letters

Institutional Control	Number of Institutions	Percent of Institutions	Number of Letters	Percent of Letters
Public	43	22%	63	14%
Private not-for-profit	131	66%	295	67%
Private for-profit	26	13%	80	18%

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To complement the distribution of institutions and letters in Table 3, we also compare whether institutions in different sectors are more likely to receive positive or negative actions. Figure 2 shows the share of letters categorized as positive or negative for public, private not-for-profit, and private for-profit institutions.

Public institutions receive negative letters at much lower rates (only one negative letter was present in our dataset), while roughly 18 to 20 percent of letters sent to not-for-profit and for-profit institutions are negative. This pattern suggests that public institutions are more often reaffirmed or continued without negative actions, while private institutions receive a higher share of letters involving concerns or sanctions.

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Figure 2. Distribution of Action Categories by Institutional Control

Percent of Letters Categorized as Positive or Negative

Public

Negative — 1.6%

Positive — 98.4%

Private not-for-profit

Negative — 18.4%

Positive — 81.6%

Private for-profit

Negative — 19.5%

Positive — 80.5%
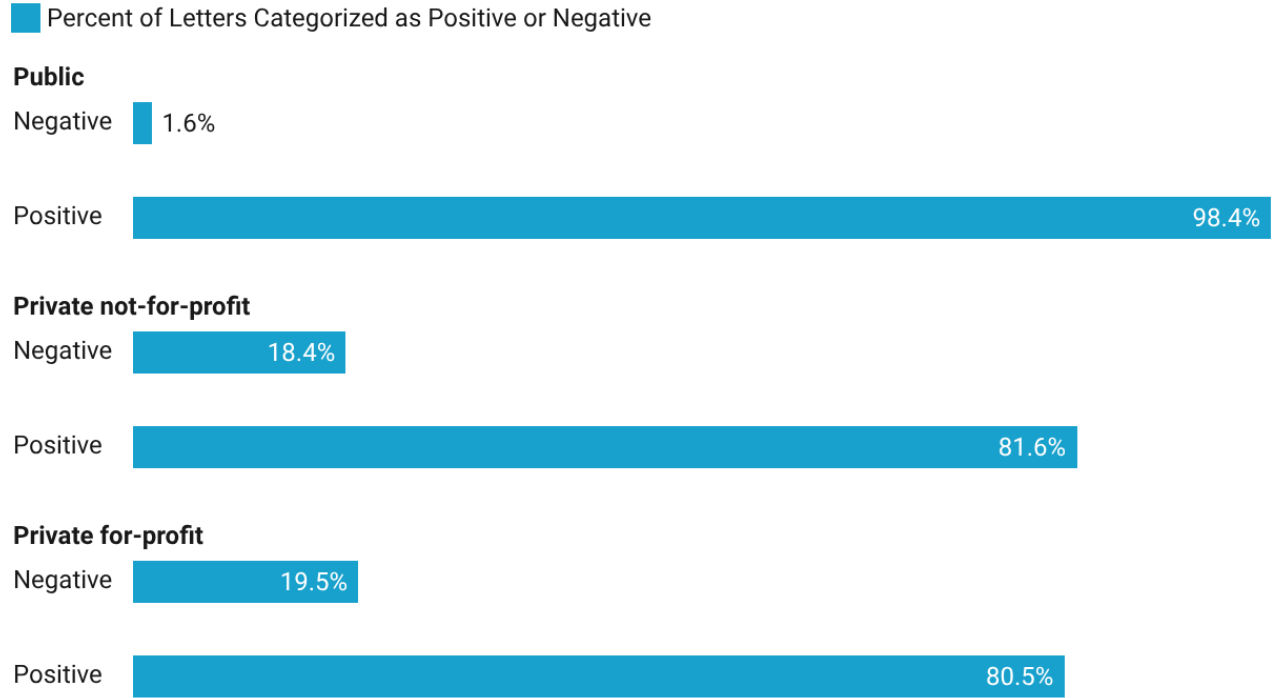
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Themes most commonly cited in letters

Next, we look across all letters to see which types of standards the Commission most commonly cites as areas for improvement. Almost every action letter, even in cases where accreditation is affirmed and no special visit is required, includes at least one reference to standards that WSCUC expects institutions to address. Many letters refer to more than one standard, and those standards are often associated with more than one theme. Figure 3 provides a high-level view of the themes that appear most often.

Out of 438 total letters, 79 percent of letters cite at least one standard related to institutional planning and continuous improvement, and about 34 percent cite standards tied to the student experience. Academic quality appears in 77 percent of letters, compared to student outcomes standards, which appear in about 57 percent of the sample. These differences help illustrate which types of standards most often prompt Commission attention.

Figure 3. Frequency of Thematic Areas Cited Across All Letters

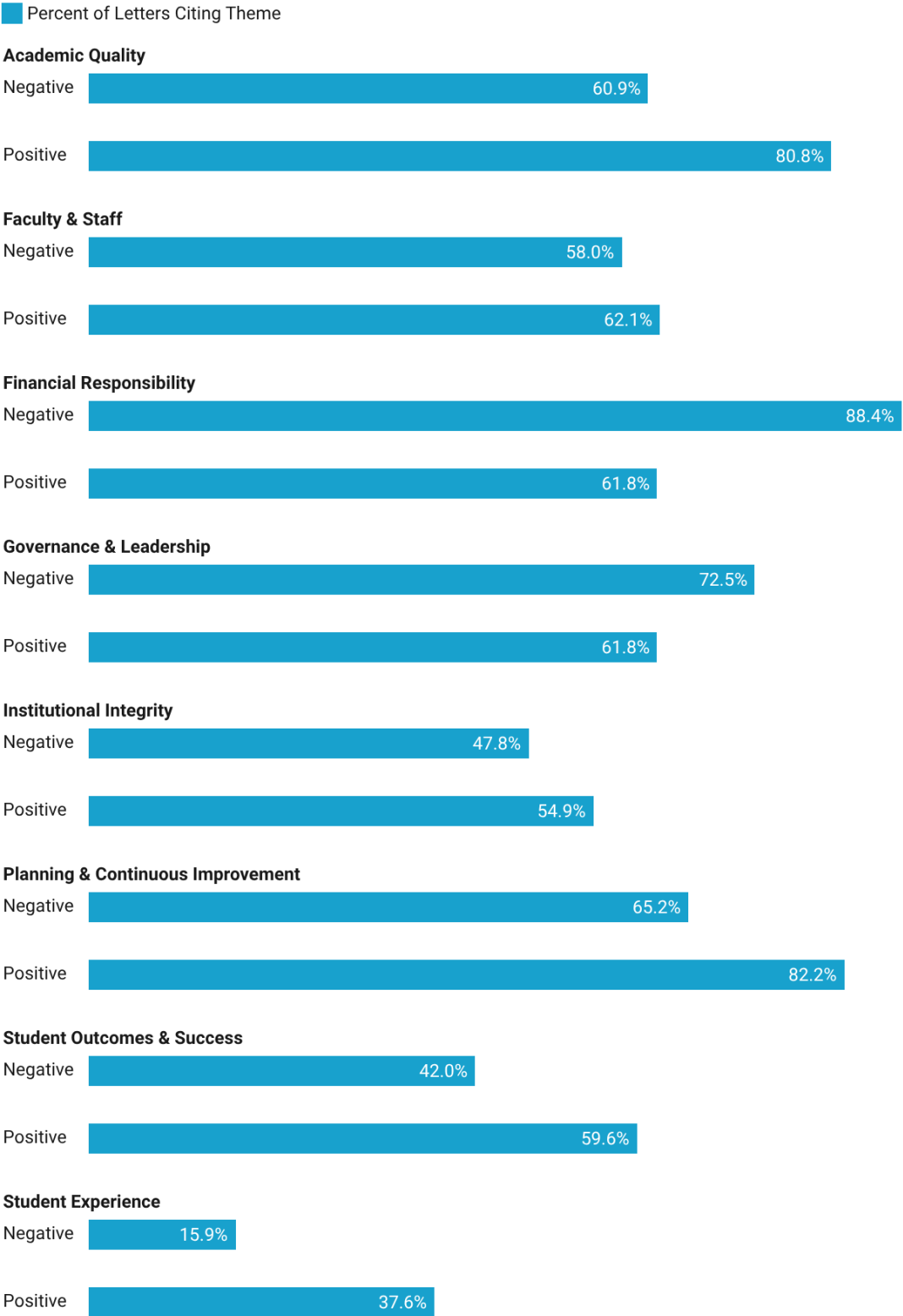| Theme	Percentage
Planning and Continuous Improvement	79.0%
Academic Quality	77.2%
Financial Responsibility	66.2%
Governance and Leadership	63.2%
Faculty and Staff	60.7%
Student Outcomes and Success	56.6%
Institutional Integrity	53.2%
Student Experience	33.8%
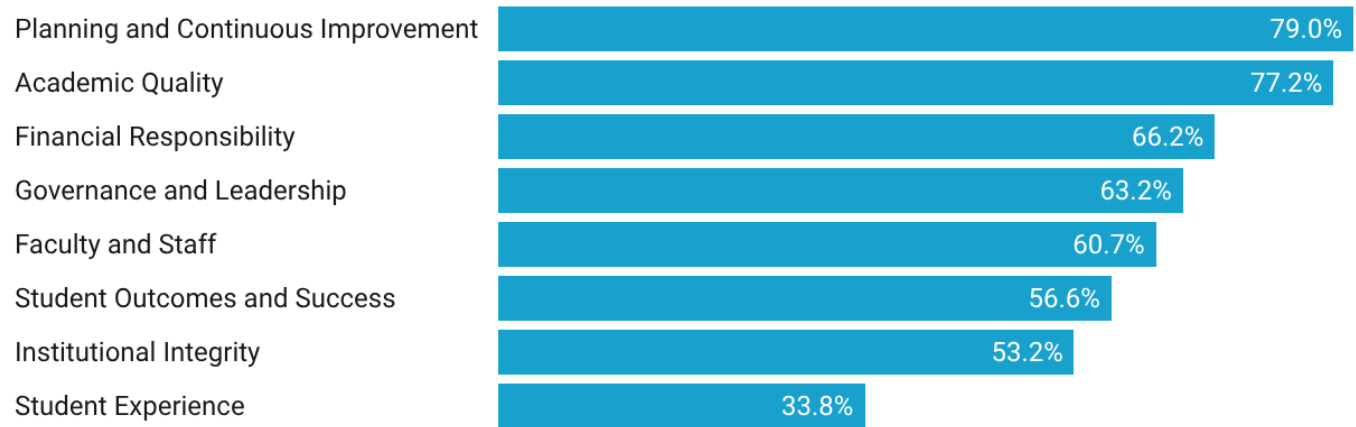
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Variation in themes across Commission action types

The standards that the Commission cites shift depending on the type and severity of the action. We compare the standards cited in negative and positive letters, then focus on the subset of positive letters that require a special visit follow-up, since these letters, while affirming accreditation, still signal areas of concern that warrant additional monitoring. We also examine a subset of negative letters, those where an institution is found almost out or fully out of compliance with WSCUC's standards. These comparisons help show whether certain themes are more closely associated with heightened Commission scrutiny.

Among all negative letters, standards associated with institutional financial responsibility are the most cited area for improvement. Eighty-eight percent of negative letters cite at least one standard in this category, compared to about 62 percent of all positive letters. Academic quality and planning and continuous improvement also appear frequently across both groups, but positive letters cite these themes at higher rates overall. About 81 percent of positive letters cite academic quality and 82 percent cite planning and improvement, compared to about 61 percent and 65 percent of negative letters. We see a similar pattern for student outcomes and success. Sixty percent of positive letters cite at least one student outcomes standard, compared to about 42 percent of negative letters.

Figure 4. Percent of Letters Citing Each Theme, by Positive vs. Negative Action Category

🟦 Percent of Letters Citing Theme

Academic Quality

Negative � 60.9%

Positive 80.8%

Faculty & Staff

Negative 58.0%

Positive 62.1%

Financial Responsibility

Negative 88.4%

Positive 61.8%

Governance & Leadership

Negative 72.5%

Positive 61.8%

Institutional Integrity

Negative 47.8%

Positive 54.9%

Planning & Continuous Improvement

Negative 65.2%

Positive 82.2%

Student Outcomes & Success

Negative 42.0%

Positive 59.6%

Student Experience
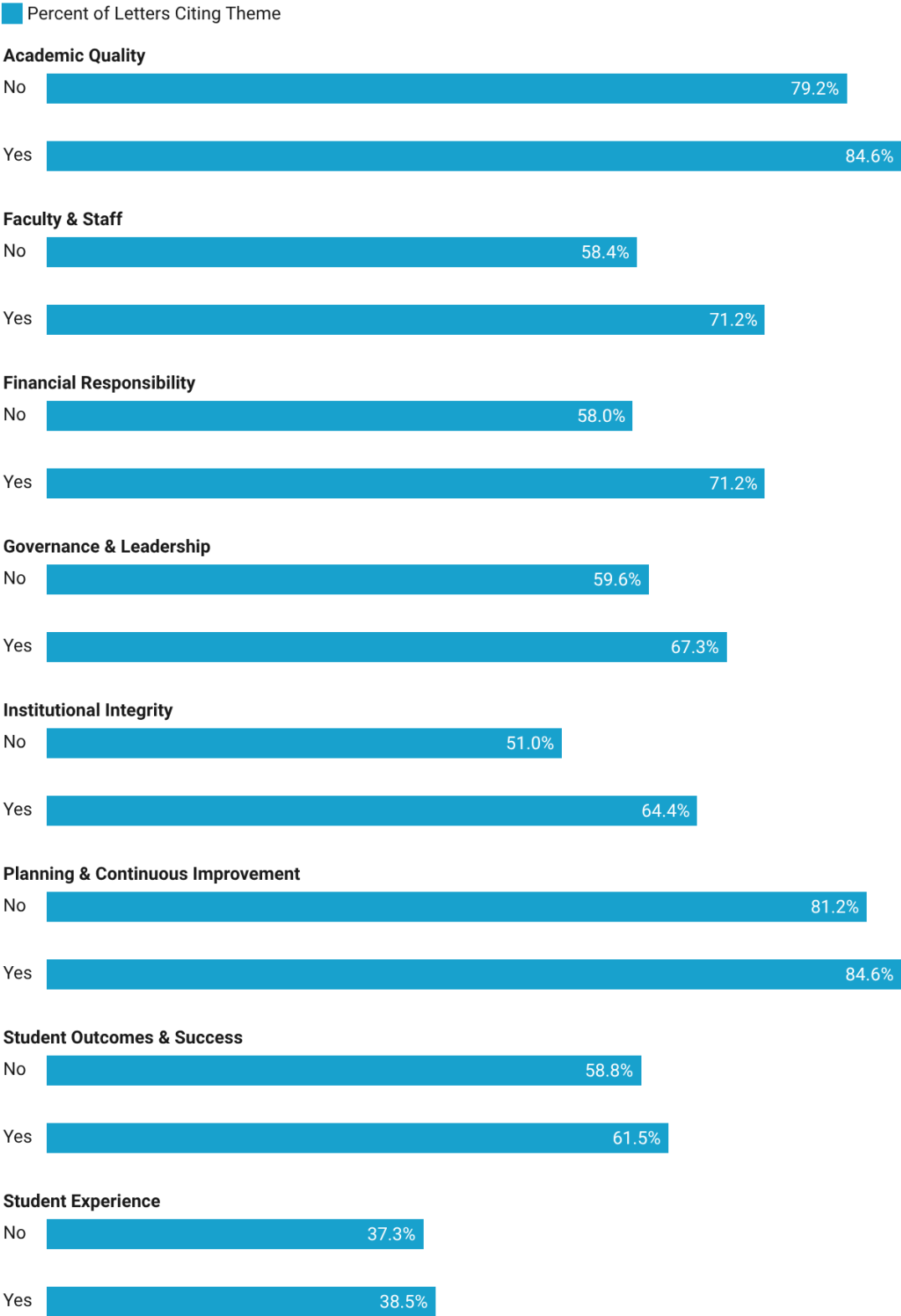
Negative 15.9%

Positive 37.6%

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Among positive letters that require a special visit as follow-up, we see some variability across themes. Even when the Commission affirms or continues accreditation, it is not uncommon for it to schedule a follow-up special visit to assess progress on the standards listed as areas of concern in the letter. Of the 359 "positive" letters in our analysis dataset, 104 required a special visit. In Figure 5 below, these are categorized as "yes," while those positive letters that did not require follow-up are categorized as "no."

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The largest gaps between these two groups appear in the faculty and staff and financial responsibility categories, where 71 percent of positive letters requiring a special visit cite standards in these areas compared to about 58 percent of positive letters that do not. Academic quality is cited at high rates regardless of follow-up, and the shares are also fairly similar across the student outcomes and success, student experience, and planning and continuous improvement categories. Academic quality is cited at high rates in positive letters regardless of follow up, and we see similar proportions for standards related to student outcomes and success, student experience, and planning and continuous improvement regardless of special visit assignment.

Figure 5. Percent of Themes Cited in Positive Letters That Require Special Visit Follow-Up

■ Percent of Letters Citing Theme

Academic Quality

No   79.2%

Yes   84.6%

Faculty & Staff

No   58.4%

Yes   71.2%

Financial Responsibility

No   58.0%

Yes   71.2%

Governance & Leadership

No   59.6%

Yes   67.3%

Institutional Integrity

No   51.0%

Yes   64.4%

Planning & Continuous Improvement

No   81.2%

Yes   84.6%

Student Outcomes & Success

No   58.8%

Yes   61.5%

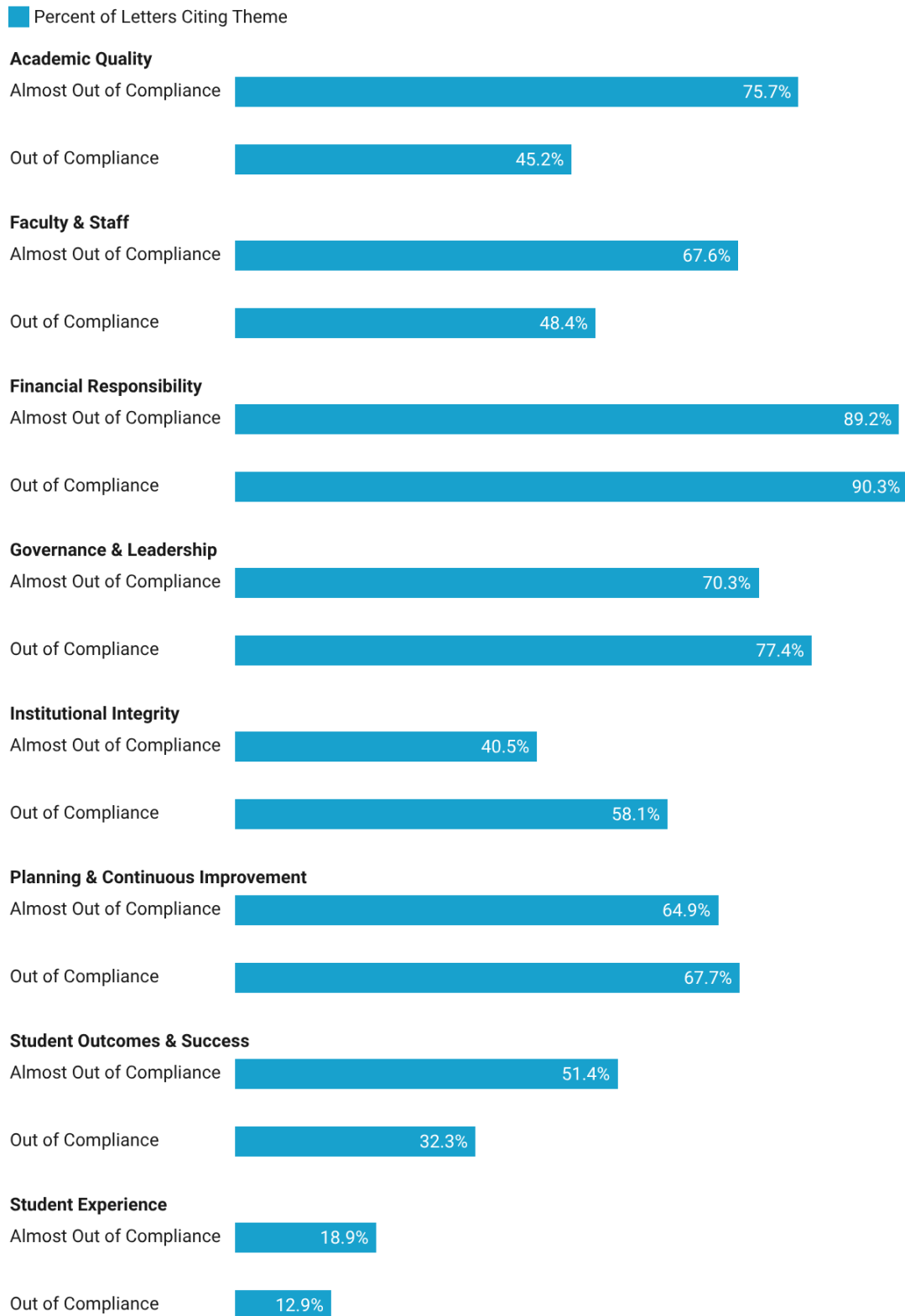**Student Experience**

No   37.3%

Yes   38.5%

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In Figure 6, we compare negative letters where an institution is *almost* out of compliance to those negative letters where the institution has been found out of compliance. In practical terms this reflects the difference between a formal Notice of Concern and a formal sanction. In our dataset, 37 letters indicate that an institution is almost out of compliance, and 31 letters indicate that an institution is out of compliance with WSCUC's standards.

> Issues tied to institutional finance are cited at very high rates, with roughly 90 percent of letters in each category referencing at least one standard related to financial responsibility.

Standards related to academic quality, faculty and staff, student outcomes and success, and student experience appear more often in letters where an institution is almost out of compliance than in letters where the institution has already been found out of compliance. Across both categories, issues tied to institutional finance are cited at very high rates, with roughly 90 percent of letters in each category referencing at least one standard related to financial responsibility. Governance and leadership concerns are also common and are somewhat more prevalent in out-of-compliance letters.

Figure 6. Percent of Themes Cited in "Almost Out of Compliance" and "Out of Compliance" Letters

■ Percent of Letters Citing Theme

Academic Quality

Almost Out of Compliance — 75.7%

Out of Compliance — 45.2%

Faculty & Staff

Almost Out of Compliance — 67.6%

Out of Compliance — 48.4%

Financial Responsibility

Almost Out of Compliance — 89.2%

Out of Compliance — 90.3%

Governance & Leadership

Almost Out of Compliance — 70.3%

Out of Compliance — 77.4%

Institutional Integrity

Almost Out of Compliance — 40.5%

Out of Compliance — 58.1%

Planning & Continuous Improvement

Almost Out of Compliance — 64.9%

Out of Compliance — 67.7%

Student Outcomes & Success

Almost Out of Compliance — 51.4%

Out of Compliance — 32.3%

Student Experience

Almost Out of Compliance — 18.9%
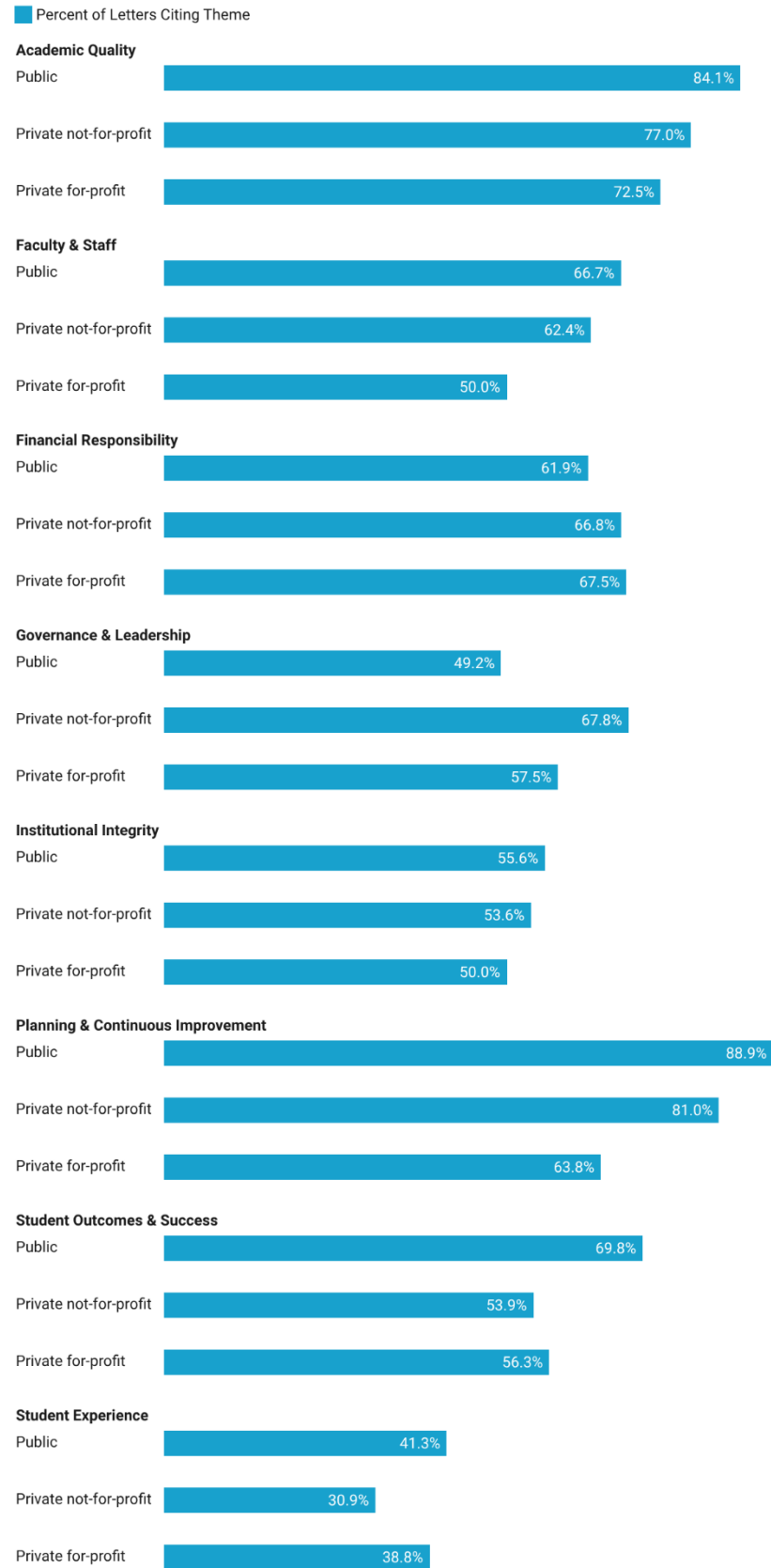
Out of Compliance — 12.9%

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Variation in themes by institution type

Finally, we look at whether patterns differ by institutional control. Figure 7 compares the share of letters citing each theme across public, nonprofit, and for-profit institutions.

Across the three institutional control groups we see some variation in the themes most often cited as areas of improvement. Public institutions tend to have higher rates of citation across several themes, including academic quality (84 percent), planning and continuous improvement (89 percent), and student outcomes and success (70 percent). Private not-for-profit institutions show similar patterns, but at slightly lower levels in most areas. The for-profit sector is smaller in the sample, and although the overall pattern is similar, citation rates for faculty and staff and student experience are lower than in the other two sectors. Financial responsibility appears consistently across all three groups. Overall, the broad pattern suggests that WSCUC cites similar categories of standards across sectors, with relatively higher rates of citation for academic quality, student outcomes, and institutional planning at public institutions.

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Figure 7. Percent of Themes Cited in Letters by Institutional Control

■ Percent of Letters Citing Theme

Academic Quality

Public	84.1%
Private not-for-profit	77.0%
Private for-profit	72.5%

Faculty & Staff

Public	66.7%
Private not-for-profit	62.4%
Private for-profit	50.0%

Financial Responsibility

Public	61.9%
Private not-for-profit	66.8%
Private for-profit	67.5%

Governance & Leadership

Public	49.2%
Private not-for-profit	67.8%
Private for-profit	57.5%

Institutional Integrity

Public	55.6%
Private not-for-profit	53.6%
Private for-profit	50.0%

Planning & Continuous Improvement

Public	88.9%
Private not-for-profit	81.0%
Private for-profit	63.8%

Student Outcomes & Success

Public	69.8%
Private not-for-profit	53.9%
Private for-profit	56.3%

Student Experience

Public	41.3%
Private not-for-profit	30.9%
Private for-profit	38.8%

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Discussion and conclusion

How WSCUC uses its standards in practice

Taken together, these findings offer a window into how WSCUC uses its standards when it reaches formal decisions about an institution's accreditation status. Almost every letter in our sample cites multiple areas for improvement, with planning and continuous improvement, academic quality, and financial responsibility appearing most often. This pattern suggests that the Commission routinely anchors its feedback in questions about whether institutions have the capacity, infrastructure, and planning processes in place to sustain quality over time, rather than isolating individual compliance problems in a narrow set of standards.

At the same time, student outcomes and success and institutional integrity appear in a majority of letters, while the student experience is cited less often. In other words, the Commission is consistently calling attention to student performance and institutional behavior, but the most common throughline in these letters is whether institutions have effective mechanisms to plan, monitor, and adjust. In combination with our previous work on written standards and data-driven practices, this descriptive picture suggests that WSCUC's public standards and review tools are aligned with the way it communicates with institutions in its formal correspondence, especially around planning, governance, and the use of evidence for improvement.[8]

Escalation of concern and institutional viability

The figures that distinguish positive and negative actions, special visits, and findings of (almost) noncompliance help clarify how the Commission signals different levels of concern. When action letters include negative

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[8] Cameron Childress, "Regional Accreditation Standards: A New Framework for Comparison," *Ithaka S+R,* February 12, 2026, https://sr.ithaka.org/publications/regional-accreditation-standards/; Cameron Childress, "Understanding the Impact of Data-Driven Accreditor Practices," *Ithaka S+R*, February 12, 2026, https://sr.ithaka.org/publications/understanding-the-impact-of-data-driven-accreditor-practices-on-student-outcomes/.

actions, financial responsibility and governance and leadership appear more prominently, while positive letters are more likely to cite academic quality, planning and improvement, student outcomes, and student experience. In effect, the themes that dominate negative letters are those most closely tied to institutional viability: financial health, leadership, and organizational capacity.

A similar pattern shows up when we separate letters that assign a special visit from those that simply reaffirm accreditation. Among positive letters, special visits are more common when faculty and staff or financial responsibility themes are cited, which suggests that WSCUC is more likely to require additional monitoring when concerns center on institutional capacity rather than on a one-time performance problem. The comparison of letters that find institutions almost out of compliance or out of compliance shows a similar pattern. Financial responsibility is nearly universal in both groups, and governance concerns appear more often in sanction letters, while standards related to academic quality, faculty and staff, and student outcomes appear more often in notices of concern. As concerns become more serious, the focus seems to narrow to the structural conditions that put an institution's long-term stability at risk.

Where student outcomes fit into the picture

One of the central questions in this project is how, and how often, student outcomes shape accreditor decision-making. This analysis shows that student outcomes and success are a regular part of the conversation. More than half of all letters cite at least one standard in this theme, and student outcomes are referenced at similar or higher rates than institutional integrity and student experience. In many positive letters, student outcomes are flagged alongside planning, academic quality, and faculty capacity as part of an ongoing agenda for institutional improvement.

Accreditors have strengthened their focus on outcomes, but questions about financial stability, leadership, and organizational capacity still carry the greatest weight when it comes to high-stakes decisions.

At the same time, student outcomes standards are not the primary driver of the most severe actions in our sample. Negative letters and formal sanctions are more consistently tied to concerns about finance and governance than to student outcomes or student experience. Outcomes appear more often in contexts where the Commission is affirming accreditation but identifying areas where institutions should continue to improve rather than as the tipping point for noncompliance. This pattern is consistent with what we heard in interviews and saw in our standards analysis: accreditors have strengthened their focus on outcomes, but questions about financial stability, leadership, and organizational capacity still carry the greatest weight when it comes to high-stakes decisions.[9]

Differences across institution types, limitations, and next steps

The cross-sector comparisons suggest that WSCUC applies a broadly similar thematic lens across public, private not-for-profit, and for-profit institutions, with some differences in emphasis. Public institutions are somewhat more likely to receive letters that cite academic quality, planning and continuous improvement, and student outcomes and success, while for-profit institutions show slightly lower rates of citation in areas such as faculty and staff and student experience.

One possible reason for this may be that public institutions tend to be larger and more complex in their governance structures, which may lead an accreditor to cite a broader set of issues in its feedback. It may also reflect the fact that public institutions receive fewer letters overall, and in particular, much fewer negative letters. If they are engaging with the accreditor mainly through the regular reaffirmation cycle, a single letter may address a wider array of standards at once, while institutions receiving more frequent letters outside the regular cycle may see citations that focus more on specific problems.

Financial responsibility appears frequently in all three sectors. These

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[9] Cameron Childress, "Regional Accreditation Standards: A New Framework for Comparison," *Ithaka S+R,* February 12, 2026, https://sr.ithaka.org/publications/regional-accreditation-standards/; Michael Fried, "Beyond Standards: A Critical Examination of the Relationship between NACIQI and Accreditors," *Ithaka S+R*, October 16, 2024, https://sr.ithaka.org/publications/beyond-standards/.

patterns are suggestive rather than definitive, since the for-profit sector is smaller in our sample and we do not link these letters to subsequent outcomes, but they indicate that the same broad categories of concern are being applied across very different institutional contexts.

Several limitations shape how we interpret these findings. The analysis is limited to one major accreditor that has chosen to make its entire set of Commission Action Letters public, and the sample includes only institutions that held accreditation or candidacy at the time of data collection. Future work could build on this analysis by combining letter data with longitudinal student outcomes and financial indicators to examine whether patterns of citation or follow-up are associated with measurable changes in institutional performance. Even with these constraints, the analysis provides a systematic view of how an accreditor applies its written standards in practice and suggests concrete ways that policy discussions about accreditation and student outcomes can move beyond abstract expectations to the actual language accreditors use when they hold institutions to account.

These findings offer more clarity on how WSCUC applies its standards in practice, and where the Commission directs most of its attention when institutions fall short of their expectations. While this analysis does not link citations in Commission Action Letters to changes in student outcomes, it provides a comprehensive starting point for understanding how standards function in actual decision making at a large institutional accreditor. This study and attached dataset may provide the basis for future work that more explicitly focuses on the effects of citations in commission action letters to changes in institutional performance.

Acknowledgements

Appendix

Framework of Commission Analysis Themes

CAL Analysis Theme	Related sub-themes from Standards Matrix	WSCUC 2013 Standards
Academic Quality	Transferable Skills; Educational Programs and Instruction; Academic Success; Degree Programs; Research and Scholarship; Distance Education and Online Learning; Libraries and Information Resources; Educational Technology Integration	1.1, 2.1, 2.2, 2.2a, 2.2b, 2.3, 2.4, 2.5, 2.7, 2.8, 2.9
Student Outcomes & Success	Student Outcomes and Attainment; Institutional Accountability for Student Success; Collection of Student Outcomes Data; Public Transparency on Student Outcomes Data; Post-Graduation Labor Market Outcomes; Equitable Outcomes; Monitoring of Student Debt	1.2, 2.6, 2.10
Student Experience	Student Support Services; Support for At-Risk Students; Student Satisfaction and Engagement; Campus Safety; Student Rights and Responsibilities; Equitable Access to higher education; Career Support and Alumni Success;	2.11, 2.13, 2.14
Institutional Integrity	Ethical Conduct and Integrity; Transparency; Academic Freedom; Institutional DEI; Compliance; Cybersecurity and Data Privacy; Affordability; Financial Aid Transparency; Mission and Vision Alignment	1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 2.12
Faculty and Staff	Faculty and Staff	3.1, 3.2, 3.3
Financial Responsibility and Management	Financial Responsibility and Management; Risk Management; Technology Infrastructure and Support;	3.4, 3.5
Governance and Leadership	Governance and Leadership; Stakeholder Engagement and Communication; Conflict of Interest	3.6, 3.7, 3.8, 3.9, 3.10
Planning and Continuous Improvement	Planning and Continuous Improvement; Action Plans for Underperforming Institutions; Use of Data for institutional improvement	4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7