Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity (NACIQI)

June 22-24, 2016

/s/
Susan D. Phillips Ph.D., Chair
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DISCLAIMER

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its June 22-24, 2016 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008, and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report’s recommendations do not purport to represent the views of the Department.
Executive Summary

NACIQI was most recently authorized by Section 106 of the Higher Education Opportunity Act of 2008. NACIQI’s primary functions include advising the Secretary of Education on the establishment and enforcement of criteria for recognition of accrediting agencies under Subpart 2 of Part H, Title IV, of the Higher Education Act of 1965, as amended (HEA), as well as the recognition of specific accrediting agencies or associations or a specific State approval agency. The NACIQI also advises the Secretary on the eligibility and certification process for institutions of higher education under Title IV, of the HEA, including the relationship between accreditation of institutions of higher education and the certification and eligibility of such institutions, and state licensing responsibilities with respect to such institutions.

NACIQI met to carry out its responsibilities to advise the senior Department official with respect to the recognition of accrediting agencies and State approval agencies, and to develop further policy recommendations, at its June 22-24, 2016 meeting at the Double Tree by Hilton Hotel at 300 Army Navy Drive, Arlington, VA 22202.

NACIQI reviewed the following types of applications at its June 22-24, 2016 meeting:

- six applications for renewal of recognition from accrediting agencies;
- two compliance reports from accrediting agencies;
- two reviews under 34 CFR 602.33, and,
- one compliance report from a State agency for the approval of public postsecondary vocational education.

NACIQI did not complete the agenda set forth in the Federal Register notice announcing the meeting. Therefore, the following agencies will be reviewed by NACIQI in August 2016 via teleconference meeting that will be announced via the Federal Register and the NACIQI website:

- Accrediting Commission of Career Schools and Colleges | Renewal of Recognition
- American Osteopathic Association, Osteopathic College Accreditation | Renewal of Recognition
- Council on Occupational Education | Renewal of Recognition
- Northwest Commission on Colleges and Universities | Compliance Report
- Transnational Association of Christian Colleges and Schools, Accreditation Commission | Renewal of Recognition

At the meeting, NACIQI moved to continue the pilot project through the December 2016 meeting. NACIQI also heard from over sixty oral commenters at the meeting. Except for a recommendation regarding one accrediting agency, American Bar Association, Council of the Section of Legal Education and Admissions to the Bar, NACIQI’s recommendations concur with the staff recommendations. NACIQI reviews all information submitted by an agency in support of its petition, as well as the staff analysis and report.
Under Secretary Ted Mitchell opened the meeting and welcomed NACIQI members and the public. He reviewed the Department’s accreditation initiatives and focus on accountability and transparency. Under Secretary Mitchell thanked NACIQI for their partnership in this endeavor.

NACIQI members in attendance for all or part of the meeting included Susan Phillips (Chair), Arthur Keiser (Vice Chair), Kathleen Sullivan Alioto, Simon Boehme, Hank Brown, Jill Derby, Roberta Derlin, Anne Neal, Richard O’Donnell, Paul LeBlanc, Arthur Rothkopf, Cameron Staples, Ralph Wolff, Frank Wu, and Federico Zaragoza. U.S. Department of Education representatives who participated in the meeting included: NACIQI Executive Director and Designated Federal Official Jennifer Hong, Accreditation Director Herman Bounds, Senior Director, Policy Development, Analysis, and Accreditation Gail McLarnon, Sally Morgan and Donna Mangold (Office of the General Counsel), Nicole Harris, Valerie Lefor, Charles Mula, Steve Porcelli, and Rachael Shultz.
Summary of Agency-Related Actions

The following agencies were acted on as a consent agenda with the following recommendation:

*Recommendation: Vote 13-0
Move that the NACIQI recommend that the senior Department official accept the recommendations as stated on the consent agenda for those agencies listed.

Puerto Rico State Agency for the Approval of Public Postsecondary Vocational, Technical Institutions and Programs
Action for Consideration: Compliance report
Recommendation: Continue the agency’s recognition for one year.
NACIQI Primary Readers: Hank Brown, Anne Neal

The following agencies were acted on using NACIQI’s standard review procedures (with pilot project questions):

American Psychological Association, Commission on Accreditation
Action for Consideration: Renewal of recognition
Recommendation: Vote 13 - 1
Continue the agency’s recognition as a nationally recognized accrediting agency at this time, and require the agency to come into compliance within 12 months with the criteria listed in the final staff analysis, and submit a compliance report due 30 days thereafter that demonstrates the agency’s compliance.
Discussion: NACIQI concurred with the staff recommendation.
NACIQI Primary Readers:
Jill Derby, Ph.D.
Anne D. Neal, J.D.
Representatives of the Agency:
Kathleen J. Bieschke, Ph.D. | APA Commission on Accreditation Chairperson, APA
Jacqueline Remondet Wall, Ph.D. | Director, Office of Program Consultation and Accreditation, APA
Third Party Commenters:
1) René Puliatti | Executive Director, California Psychology Internship Council
2) Pirouz Ganji | Registered Psychological Assistant, PsyD Candidate: California Institute of Integral Studies, APA Division 39 student member
3) Juliet Rohde-Brown, Ph.D. | Core Faculty and Director of Clinical Training, Pacifica Graduate Institute Clinical Program, Academic Senate Secretary
4) Amanda T. Stewart | California Licensed Clinical Psychologist (CA PSY27174)
5) Jaclyn D. Deilgat, Ph.D. | Licensed Clinical Psychologist (PSY27879); Executive Director, Collective Connections Counseling & Consultation Services
6) Oksana Yakushko, PhD | Core Faculty, Chair, Clinical Psychology Program, Pacifica Graduate Institute, Pacifica.edu
7) Andrea Kaplan, Ph.D. | Professor, Clinical Psychology, American School of Professional Psychology
Accreditation Commission for Acupuncture and Oriental Medicine

Action for Consideration: Renewal of recognition

Recommendation: Vote 14 - 0

Renew the agency’s recognition for a period of five years.

Discussion: NACIQI concurred with the staff recommendation.

NACIQI Primary Readers:
Arthur Rothkopf, J.D.
Federico Zaragoza, Ph.D.

Representative of the Agency:
Mark S. McKenzie, PhD | MsOM | LAc | Executive Director, ACAOM
John Paul Liang, PhD | LAc | Chair, ACAOM
Karl Gauby, PhD, JD, | Director of Regulatory Affairs, ACAOM

American Bar Association, Council of the Section of Legal Education and Admissions to the Bar (ABA)

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 7 – 4 (Recusals: Wu)

Continue the agency’s recognition as a nationally recognized accrediting agency at this time, limit the scope of the agency’s recognition to exclude the accreditation of any new institutions and programs, and require the agency to come into compliance within 12 months with the criteria listed in the final
staff analysis, and in addition, sections 602.19(b) and 602.20, and submit a compliance report due 30 days thereafter that demonstrates the agency’s compliance.

**Discussion:** NACIQI concurred with the staff recommendation to allow the agency 12 months to come into compliance with the criteria listed in the final staff report, but added two additional findings of non-compliance under sections 602.19(b) and 602.20. NACIQI further added a limitation to the agency’s scope of recognition to exclude the accreditation of any new institutions and programs.

**NACIQI Primary Readers:**
Robert L. Derlin, Ph.D.
Arthur E. Keiser, Ph.D.

**Representative of the Agency:**
Barry Currier | Managing Director, ABA
Stephanie Giggetts | Accreditation Counsel, ABA
William Adams | Deputy Managing Director, ABA
Rebecca White Berch | Justice of the Supreme Court of Arizona and Chair of the Council of the Section of Legal Education and Admissions to the Bar | Supreme Court of Arizona

**Third Party Commenters:**
1. Montgomery Blair Sibley
2. William Sumner Scott

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**Accrediting Bureau of Health Education Schools (ABHES)**

**Action for Consideration:** Renewal of recognition (Recusals: Keiser)

**Committee Recommendation:** Vote 10 - 0

Renew the agency’s recognition for a period of five years.

**Discussion:** NACIQI concurred with the staff recommendation.

**NACIQI Primary Readers:**
Simon Boehme
Anne D. Neal, J.D.

**Representative of the Agency:**
Ms. Florence S. Tate | Executive Director, ABHES
John A. Yena, MBA | Chairman of the Board, ABHES
Amy Rowe | Director of Institutional Review and Development, ABHES

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**Commission on Accrediting of the Association of Theological Schools (ATS)**

**Action for Consideration:** Renewal of recognition

**Committee Recommendation:** Vote 10 – 0

Renew the agency’s recognition for a period of five years.

**Discussion:** NACIQI concurred with the staff recommendation.

**NACIQI Primary Readers:**
Hank Brown, J.D.
Federico Zaragoza, Ph.D.

**Representative of the Agency:**
Daniel O. Aleshire, PhD | Executive Director, ATS
Alton B. Pollard, III, PhD | Chair of ATS Board of Commissioners and Dean at Howard University School of Divinity, ATS
**Accrediting Council for Independent Colleges and Schools (ACICS)**

*Action for Consideration:* Renewal of recognition  
*Committee Recommendation:* Vote 10 – 3  
Deny the agency’s petition for renewal of recognition, and withdraw the agency’s recognition.  
*Discussion:* NACIQI concurred with the staff recommendation.

*NACIQI Primary Readers:*  
Ralph Wolff, J.D.  
Frank H. Wu, J.D.

*Representative of the Agency:*  
Mr. Anthony Steven Bieda | Executive In Charge, ACICS  
Dr. Lawrence Leak | Chair of ACICS  
Mr. Kenneth Ingram, Esq.

*Third Party Commenters:*  
1) Tariq Habash for Robert Shireman | Senior Fellow, The Century Foundation  
2) Christopher J. Madaio, Esq. | Maryland Office of the Attorney General, Consumer Protection Division  
3) Ben Miller | Senior Director for Postsecondary Education, Center for American Progress  
4) Steve Gunderson | President and CEO, Association of Private Sector Colleges and Universities  
5) Aaron Shenck | Executive Director, The Pennsylvania Association of Private School Administrators  
6) Doug Seelbach | Mechanical Designer/3d Designer, Six Sigma/The UPS Store  
7) Allan G. Hancock CLU ChFC | Chief Executive Officer and Chairman of the Board, The Hancock Group, Inc., and, Advisory Board Member, DuBois Business College  
8) Joshua K Renicker | Chief Operating Officer, Energy Access, Inc.  
9) Quirt Marlon Collins  
10) Jim Bare | Registered Medical Assistant / Registered Phlebotomy Technician, Johnson City Community Health Clinic  
11) James Harsh | Systems Support Technician, ITT Technical Institute/employee/graduate  
12) Xavier Ferguson | Recruiting Coordinator, Labor Ready  
13) Kevin M. Gratz | Talent Acquisition Specialist, SSM/Dean Clinic  
14) Bobbie Casteel Consultant | Perkins Cybersecurity & Advisory Services  
15) Mendi Goble | Executive Director, Richmond Chamber of Commerce  
16) Carrie Wofford | President, Veterans Education Success  
17) Sara Nolan Collins | Legal Services Director, Veterans Education Success  
18) Walter Ochinko | Policy Director, Veterans Education Success

**American Veterinary Medical Association, Council on Education (AVMA)**

*Action for Consideration:* Compliance report  
*Committee Recommendation:* Vote 12 – 0  
Continue the agency’s recognition for one and one-half years.  
*Discussion:* NACIQI concurred with the staff recommendation.

*NACIQI Primary Readers:*
Roberta Derlin, Ph.D.
Frank H. Wu, J.D.

Representative of the Agency:
John Pascoe, BVSc, PhD, Diplomate ACVS | Chair, AVMA Council on Education
John Scamahorn, DVM | Chair-elect AVMA Council on Education
Karen Martens Brandt, DVM | Director, Education & Research, AVMA Council on Education

Third Party Commenters:
1) Sheila W. Allen DVM, MS | Dean, College of Veterinary Medicine
2) William D. Tyrrell, Jr., DVM, DACVIM-Cardiology | Speaking as a practice owner and practitioner
3) William J. Kay, DVM
4) Paul D. Pion, DVM, DACVIM (Cardiology) | President and co-founder, Veterinary Information Network
5) Jeffery B. Newman, DVM | Veterinarian Owner and Practitioner, Caring Hands Animal Hospitals
6) Arnold L. Goldman DVM, MPH | Connecticut Veterinary Medical Foundation c/o Canton Animal Hospital LLC
7) Deborah T. Kochevar, DVM, PhD, DACVCP | Dean and Henry and Lois Foster Professor, Cummings School of Veterinary Medicine at Tufts University
8) Jerry Owens, DVM
9) Walter Robinson, DVM | East North Veterinary Clinic
10) Mark Johnson, DVM | Owner, Pender Veterinary Center
11) John N. Sexton, DVM | Medical Director, Mclean Animal Hospital
12) Jim Wilson

National Council for Accreditation of Teacher Education
Action for Consideration: Review under 34 CFR 602.33
Committee Recommendation: Vote 9 – 0
Withdraw recognition from NCATE, and remove NCATE from the published list of nationally recognized accrediting bodies, effective on the date of the official notification letter from the Senior Department Official.
Discussion: NACIQI concurred with the staff recommendation.
NACIQI Primary Readers:
Kathleen Sullivan Alioto, Ed.D.
Richard F. O’Donnell
Representative of the Agency:
None

Teacher Education Accreditation Council, Accreditation Committee
Action for Consideration: Review under 34 CFR 602.33
Committee Recommendation: Vote 10 – 0
Withdraw recognition from TEAC, and remove TEAC from the published list of nationally recognized accrediting bodies, effective on the date of the official notification letter from the Senior Department Official.
Discussion: NACIQI concurred with the staff recommendation.
NACIQI Primary Readers:
Northwest Commission on Colleges and Universities (NWCCU)

Action for Consideration: Compliance report
Committee Recommendation: Vote 6 – 3
Table consideration of compliance report to the telephonic meeting.

Discussion: Due to limited time and the agency’s absence, NACIQI moved to consider the agency’s report at the telephonic meeting in August.

NACIQI Primary Readers:
Paul J. LeBlanc, Ph.D.
Cameron C. Staples, J.D.

AGENCIES POSTPONED TO AUGUST 2016 NACIQI MEETING

Accrediting Commission of Career Schools and Colleges
Action for Consideration: Renewal of recognition

American Osteopathic Association, Commission on Osteopathic College Accreditation
Action for Consideration: Renewal of recognition

Council on Occupational Education
Action for Consideration: Renewal of recognition

Northwest Commission on Colleges and Universities
Action for Consideration: Compliance Report

Transnational Association of Christian Colleges and Schools, Accreditation Commission
Action for Consideration: Renewal of recognition