

U.S. Department of Education
Office of Postsecondary Education

**National Advisory Committee
on Institutional Quality and Integrity**



Fiscal Year 2016 Annual Report
Committee Activities: Fiscal Year 2015

National Advisory Committee on Institutional
Quality and Integrity (NACIQI)

Annual Report to the Secretary of Education and Congress

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NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY

ANNUAL REPORT TO THE SECRETARY OF EDUCATION AND CONGRESS

Overview

The National Advisory Committee on Institutional Quality and Integrity (NACIQI or the Committee) respectfully submits this fiscal year 2016 report on its activities during fiscal year 2015 to the Secretary of Education (Secretary) and to Congress. Section 114(e)(2) of the Higher Education Act of 1965, as amended (HEA), mandates that NACIQI produce an annual report that contains four items:

- A detailed summary of the agenda and activities of, and the findings and recommendations made by, the Committee during the fiscal year preceding the fiscal year in which the report is made;
- A list of the date and location of each meeting during the fiscal year preceding the fiscal year in which the report is made;
- A list of the members of the Committee; and
- A list of the functions of the Committee, including any additional functions established by the Secretary through regulation.

I. Committee Agenda and Activities During Fiscal Year 2015

NACIQI held two meetings during fiscal year 2015: December 11, 2014, and June 25-26, 2015. Meeting agendas are provided with this report (see Attachments A and C).

At its December 11, 2014 NACIQI meeting, the Committee carried out its advisory function with respect to the recognition of six agencies: five accrediting agencies and one state approval agency for vocational education. Under Secretary Ted Mitchell spoke to the Committee in public forum during the meeting regarding the Department's postsecondary initiatives. The Committee also discussed the status of its policy recommendations.

A summary of the Committee's deliberation and the Committee's recommendation regarding each agency review is provided with this report (see Attachment B).

At the June 25-26, 2015, NACIQI meeting, the Committee carried out its advisory function with respect to the recognition of nine agencies. Under Secretary Ted Mitchell spoke to the Committee in public forum during the meeting regarding the Department's postsecondary initiatives. David Musser, Office of Federal Student Aid, presented information regarding the Department's Experimental Sites Initiative. Jennifer Hong, Executive Director, reviewed the

NACIQI's criteria for placing an agency on the consent agenda, and Herman Bounds, Director, Accreditation Group, discussed the different types of complaints received by the Accreditation Group and how staff processes such complaints. The Committee also edited and finalized its 2015 policy recommendations (see Attachment E).

A summary of the Committee's deliberation and the Committee's recommendation regarding each agency review is provided with this report (see Attachment D).

II. Date and Location of NACIQI Meetings

December 11, 2014: Crowne Plaza National Airport
1480 Crystal Drive
Arlington, VA 22202

June 25-26, 2015: Sheraton Pentagon City
Galaxy Ballroom (16th Floor)
900 S. Orme St.
Arlington, VA 22204

III. Committee Membership

NACIQI has 18 members appointed as follows:

- Six members appointed by the Secretary;
- Six members appointed by the Speaker of the U.S. House of Representatives, three of whom are appointed on the recommendation of the majority leader of the U.S. House of Representatives and three of whom are appointed on the recommendation of the minority leader of the U.S. House of Representatives; and
- Six members appointed by the President Pro Tempore of the U.S. Senate, three of whom are appointed on the recommendation of the majority leader of the U.S. Senate and three of whom are appointed on the recommendation of the minority leader of the U.S. Senate.

Please refer to Attachment F for the NACIQI member listing, including the nominating source for each member, for fiscal year 2015.

IV. Committee Functions

NACIQI was established by Section 114 of the HEA of 1965, as amended by Section 106 of the HEOA. By law, NACIQI advises the Secretary of Education with respect to the following functions:

1. The establishment and enforcement of the standards of accrediting agencies or associations under Subpart 2 of Part H of Title IV, HEA;
2. The recognition of a specific accrediting agency or association;
3. The preparation and publication of the list of nationally recognized accrediting agencies and associations;
4. The eligibility and certification process for institutions of higher education under Title IV, HEA, together with recommendations for improvements in such process;
5. The relationship between:
 - A. Accreditation of institutions of higher education and the certification and eligibility of such institutions;
 - B. State licensing responsibilities with respect to such institutions; and
6. Other advisory functions relating to accreditation and institutional eligibility as the Secretary may prescribe by regulation.

The Secretary has not prescribed any other advisory functions relating to accreditation and institutional eligibility by regulation for NACIQI.

V. Sources of Additional Information about the Committee

For additional information concerning the Committee's activities, access the NACIQI website at <http://sites.ed.gov/naciqi/>, or contact the Executive Director whose contact information is listed below.

Jennifer Hong, Ed.D.
Executive Director, NACIQI
U.S. Department of Education
400 Maryland Ave., SW, Room 6W250
Washington, D.C. 20202
Phone: (202) 453-7805
E-mail: Jennifer.Hong@ed.gov



**U.S. DEPARTMENT OF EDUCATION
Office of Postsecondary Education**

**Crowne Plaza National Airport
1480 Crystal Drive
Arlington, VA 22202**

**National Advisory Committee on
Institutional Quality and Integrity (NACIQI)**

December 11, 2014 Meeting

AGENDA

NOTE: The times listed for agenda items are subject to change, depending upon the amount of time the Committee devotes to earlier items on the agenda and other circumstances that may arise. All individuals participating in the discussion of an agenda item are advised to arrive at the meeting well in advance of the listed time.

THURSDAY, December 11, 2014

7:30 a.m. Meeting Room Open to Public

8:00 a.m. Welcome and Introductions
Susan D. Phillips, Chairperson, NACIQI

8:15 a.m. Discussion with Ted Mitchell, Under Secretary, Department of Education

9:00 a.m. BREAK

9:15 a.m. Overview of Meeting Agenda and Consent Agenda Procedures

Consent Agenda Procedures

1. Introduction of the Consent Agenda
2. Third party oral comments
3. Are there any agencies to be removed from the Consent Agenda?
4. Consent Agenda moved and seconded
5. Vote taken on the Consent Agenda

If any member should request that any agency be removed from the consent agenda, the agency will revert to the standard review process and be rescheduled to the afternoon review session.

Consent Agenda

Actions for Consideration: Recognition Based on Compliance Report

1. **Academy of Nutrition and Dietetics, Accreditation Council for Education in Nutrition and Dietetics (ACEND)**
2. **Middle States Commission on Higher Education (MSCHE)**
3. **New York State Board of Regents and Commissioner of Education (NYSBR)**
4. **Oklahoma Department of Career & Technology Education (OKSB-vt)**
5. **Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities (WASC-SR)**

9:20 a.m. Overview: Standard Review Procedures

Standard Procedures for Review of Agencies

1. Introduction of Agency Petition by Primary Committee Reader
2. Briefing by Department Staff
3. Remarks by Agency Representatives
4. Presentations by Third-Party Commenters
5. Agency Response to Third-Party Comments
6. Department Response to Agency and Third-Party Comments
7. Committee Discussion and Voting

9:30 a.m. American Veterinary Medical Association, Council on Education (AVMA-COE)

Action for Consideration: Recognition Based on Compliance Report

NACIQI Primary Readers:

Federico Zaragoza, William Pepicello

Department Staff:

Dr. Jennifer Hong

Representatives of Agency:

Dr. Frederik J. Derksen, Chair, Counsel on Education AVMA

Dr. John Pascoe, AVMA

Dr. David Granstrom, Associate Executive Vice President and Chief Operation Officer, AVMA

Dr. Karen Martens Brandt, Director, Education and Research Division, AVMA

Third Party Oral Commenters

1. Sheila W. Allen, DVM MS, Dean, University of Georgia
2. Trevor Ames, Professor and Dean, College of Veterinary Medicine, University of Minnesota

3. Eric Bregman, VMD
4. Nancy O. Brown, VMD, DACVS, DACVIM, Hickory Veterinary Hospital
5. Cyril Clarke, Dean, VA-MD Regional College of Veterinary Medicine
6. Mark Cushing, Founding Partner, Animal Policy Group/Tonkon Torp LLP
7. Joan C. Henricks, V.M.D., Ph.D, School of Veterinary Medicine, University of Pennsylvania
8. Kent Hoblet, DVM
9. William Kay, DVM, DACVIM, DABBP
10. Deborah T. Kochevar, DVM, PhD, DACVCP, Cummings School of Veterinary Medicine at Tufts University
11. Michael D. Lairmore, Dean, School of Veterinary Medicine, University of California, Davis
12. Mary Beth Leininger, DVM
13. Sheila Lyons, Founder and Director, The American College of Veterinary Sports Medicine and Rehabilitation
14. Robert Marshak, DV, DACVIM, School of Veterinary Medicine, University of Pennsylvania
15. Eden Myers, DVM
16. Phillip Nelson, Dean and Professor of Immunology

11:30 a.m. BREAK

**12:00 p.m. Status: 2014 Accreditation Policy Recommendations Report
Framework of the Deliberation**
Susan Phillips, Chair

**12:15 p.m. Committee Discussion/Deliberation: Accreditation Policy Recommendations
WORKING LUNCH (on your own)**

2:00 p.m. BREAK

2:15 p.m. Continued Discussion/Deliberation: Accreditation Policy Recommendations

5:30 p.m. Wrap up and Closing Comments

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity

December 11, 2014



/s/

Susan D. Phillips, Chair

Report of the Meeting
National Advisory Committee
on Institutional Quality and Integrity

December 11, 2014

Susan D. Phillips, Chair

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DISCLAIMER

This report was written as a part of the activities of the National Advisory Committee on Institutional Quality and Integrity (NACIQI), an independent advisory committee established by statute. The NACIQI is subject to the Federal Advisory Committee Act and the regulations implementing that statute. 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

Background:

The National Advisory Committee on Institutional Quality and Integrity (NACIQI or the Committee), was established by Section 114 of the Higher Education Act (HEA) of 1965, as amended by the Higher Education Amendments of 1992 and, most recently, Section 106 of the Higher Education Opportunity Act (HEOA). The HEOA made changes to section 496 of the HEA “Recognition of Accrediting Agency or Association” and suspended the activities of the NACIQI upon enactment on August 14, 2008. It also changed the composition of the Committee by increasing the membership from 15 to 18 and shifting appointment authority that had been vested solely in the Secretary to the Secretary, the President pro tempore of the Senate, and the Speaker of the House, each of whom may appoint six members. Also, rather than having the Secretary appoint the Chair, the HEOA required the members to elect a Chair. In July 2010, new regulations went into effect that govern the process by which accrediting agencies seek recognition by the Secretary as a reliable authority regarding the quality of education and training provided by an institution (or program) they accredit.

Chief among its statutory functions is the Committee’s responsibility to advise the Secretary of Education, or his designee, the Senior Department Official (the Assistant Secretary for Postsecondary Education), regarding the recognition of specific accrediting agencies or associations, or specific State approval agencies, as reliable authorities concerning the quality of education and training offered by the postsecondary educational institutions and programs they accredit. Another function of the NACIQI is to advise the Secretary on the establishment and enforcement of the Criteria for Recognition of accrediting agencies or associations under Subpart 2, Part H, Title IV, of the HEA. The NACIQI also provides advice to the Secretary regarding policy affecting both recognition of accrediting and State approval agencies and institutional eligibility for participation in programs authorized under Title IV of the Higher Education Act of 1965, as amended. The NACIQI is required by law to meet at least twice a year.

Discussion:

At its December 11, 2014 meeting, held at the Crowne Plaza National Airport, 1480 Crystal Drive, Arlington, VA, the Committee met to carry out its duties to advise the Assistant Secretary with respect to the recognition of accrediting agencies and State approval agencies. Following its review of agencies for recognition, the Committee continued its discussion of policy recommendations to advise the Secretary in preparation of the reauthorization of the Higher Education Act. Also, Undersecretary Ted Mitchell, spoke to the Committee in public forum regarding the Department’s higher education initiatives.

The Committee reviewed compliance reports for renewal of recognition from 5 accrediting agencies, and 1 State approval agency for public postsecondary vocational education. In all but one instance, the American Veterinary Medicine Association, Council on Education (AVMA-COE), the Committee’s recommendations are the same as the staff recommendations.

NACIQI members in attendance for all or part of the meeting included Susan Phillips (Chair), Arthur Keiser (Vice Chair), Simon Boehme, Jill Derby, Roberta Derlin, John Etchemendy, Anne Neal, William Pepicello, Arthur Rothkopf, and Federico Zaragoza. U.S. Department of Education personnel who participated in the meeting included: Committee Executive Director Carol Griffiths, Accreditation Director Herman Bounds, Program Attorney Sarah Wanner, Office of Postsecondary Education staff: Herman Bounds, Elizabeth Daggett, Karen Duke, Jennifer Hong-Silwany, Patricia Howes, Valerie Lefor, Charles Mula, Steve Porcelli, Cathy Sheffield, and Rachael Shultz.

THE RECOGNITION OF ACCREDITING AGENCIES AND STATE APPROVAL AGENCIES:

The Committee reviewed reports from 6 agencies – five accrediting agencies, one State approval agency for vocational education.

Summary of Agency-Related Actions Taken by the Committee:

I. Renewal of Recognition as Nationally Recognized Accrediting Agencies Based on Review of the Agency's Compliance Report

Academy of Nutrition and Dietetics, Accreditation Council for Education in Nutrition and Dietetics (ACEND)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and pre-accreditation, within the United States, of Didactic and Coordinated Programs in Dietetics at both the undergraduate and graduate level, postbaccalaureate Dietetic Internships, and Dietetic Technician Programs at the associate degree level and for its accreditation of such programs offered via distance education.

Committee Recommendation: Vote: 6-0 (Recusal: Etchemendy, Phillips, Rothkopf)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Simon Boehme, Jill Derby

Representatives of the Agency:
Dr. Mary B. Gregoire, PhD, RD, Executive Director, ACEND
Dr. Mary Ann Taccona, MBA, RD, Associate Executive Director, ACEND
Dr. Merievelyn Stuber, MS, RD, Chair, ACEND Board, ACEND
Dr. Sonja Connor, MS, RD, President, Academy of Nutrition and Dietetics
Dr. Glenna McCollum, PhD, RD, Immediate Past President, Academy of Nutrition and Dietetics

American Veterinary Medical Association, Council on Education (AVMA-COE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Provisional Accreditation") in the United States of programs leading to professional degrees (D.V.M. or D.M.D.) in veterinary medicine

Committee Recommendation: Vote: 9:0

NACIQI recommends that the AVMA-COE be granted an extension of its recognition, for good cause, for a period of six months and require the agency to submit a compliance report demonstrating its compliance with the cited criteria in the staff report within 30 days of expiration of the six-month period, with the reconsideration of recognition status thereafter, including a review of the compliance report and appearance by the agency at a NACIQI meeting to be designated by the Department.

Regarding the new findings under §602.13 and §602.15, the NACIQI recommends continuation of the agency's recognition and require the agency to come into compliance within 12 months, and submit a compliance report that demonstrates the agency's compliance with §602.13 (wide acceptance among practitioners) and with §602.15 (the agency's administrative capability, specifically, that it applies clear and effective controls against conflicts of interests, or the appearance of conflicts of interest by the agency's Council).

Comments:

The Committee's recommendation concurs with the Department staff recommendation in its entirety. In addition, the NACIQI also believes that the agency has not adequately demonstrated that it has clear and effective controls against conflict of interest or the appearance of conflict of interest by its accreditation decision-making body. Therefore, the NACIQI also recommends that the agency be required to submit a compliance report in 12 months that demonstrates the agency's compliance with §602.15 -- specifically, that it's Council adheres to clear and effective controls against conflicts of interests, or the appearance of conflicts of interest.

The Committee's recommendation is based on the following circumstances:

1. The Committee noted that there is a growing segment of the profession that continues to raise questions and concerns re the agency's practices. During its 2012 review, the agency's petition engendered 25 written comments and 10 oral presentations to the Committee. During review of this compliance report, the agency received 900+ written comments and 16 oral presentations of the agency's policy and practices. A majority of these 900+ written and oral comments raised concerns regarding the agency's practices, some of which were consistent with outstanding issues raised in the staff report and the Committee's review.
2. The Committee noted there is a lack of evidence in the agency documentation to either support or reject the agency's practices involving some of the issues raised by 3rd party commenters. These issues, some of which were not a part of the staff analysis, results in the Committee's desire for more evidence-based documentation and a more cohesive response from the agency regarding the issues raised from the 3rd party comments, (i.e., conflict of interest practices within the Council, particularly in the context of Council expulsions of Council members; due process for Council members; the sufficiency of autonomy of the Council from the membership association; and the perceived significant disconnection between the Council and its constituencies- cited by staff as well-- under §602.13).

The areas of Committee inquiry of 3rd party commenters, the agency and the staff focused on the agency's --

- a) Application of its conflict of interest policies that resulted in the expulsion of 2 Council members.
- b) The autonomy of the Council from the membership association and the timing of accreditation decisions subsequent to a lawsuit from one of its programs.
- c) The consistent application of valid student outcome measures.
- d) The disconnect between the agency and its practitioner community and the agency's need to provide evidence that demonstrates its success in opening a dialogue on the issues in a way that addresses the concerns of the community.

The Committee believes that its recommendation (which concurs with the staff recommendation fully) but also recommends that the agency be required to submit a compliance report in 12 months that demonstrates the agency's compliance with §602.15 in the context of the circumstances described above, best serves the integrity of the process.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
Federico Zaragoza, William Pepicello

Representatives of the Agency:
Dr. Frederik J. Derksen, Chair, Counsel on Education, AVMA
Dr. John Pascoe, AVMA
Dr. David Granstrom, Associate Executive Vice President and Chief Operation Officer, AVMA
Dr. Karen Martens Brandt, Director, Education and Research Division, AVMA

Third Party Commenters:
See Page 12

Middle States Commission on Higher Education (MSCHE)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Candidacy status") of institutions of higher education in Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the U.S. Virgin Islands, including distance and correspondence education programs offered at those institutions..

Committee Recommendation: Vote: 6-0 (Recusals: Etchemendy, Phillips, Rothkopf)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:
Arthur Keiser, Frank Wu

Representatives of the Agency:
Dr. Elizabeth H. Sibolski, President, MSCHE
Ms. Mary Beth Kait, Senior Director for Planning and Policy, MSCHE

New York State Board of Regents and Commissioner of Education (NYSBR)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation of those degree-granting institutions of higher education in New York that designate the agency as their sole or primary nationally recognized accrediting agency for purposes of establishing eligibility to participate in HEA programs including accreditation of programs offered via distance education within these institutions.

Committee Recommendation: Vote of 6-0 (Recusals: Etchemendy, Phillips, Rothkopf)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:
Roberta Derlin, Anne Neal

Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities (WASC-SR)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current and Requested Scope of Recognition: The accreditation and preaccreditation ("Candidate for Accreditation") of senior colleges and universities in California, Hawaii, the United States territories of Guam and American Samoa, the Republic of Palau, the Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands and the Republic of the Marshall Islands, including distance education programs offered at those institutions.

Committee Recommendation: Vote of 6-0 (Recusals: Etchemendy, Phillips, Rothkopf)
NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of three years.

Comments: There were no compliance issues and no further discussion of the agency's report.

Written Materials Reviewed by the Committee: Petition and supporting documentation submitted by the agency and the Department staff analysis and report.

NACIQI Primary Readers:

William Pepicello, Arthur Rothkopf

Representative of the Agency:

Dr. Mary Ellen Petrisko, Ph.D., President, WASC Senior College and University Commission

Dr. William Ladusaw, Ph.D., Commission Chair, WASC Senior College and University Commission

Dr. Melanie Booth, EdD, Vice President, WASC Senior College and University Commission

II. Renewal of Recognition as a State Agency Recognized for the Approval of Vocational Education Based on Review of the Agency's Compliance Report

Oklahoma Department of Career & Technology Education (OKSB-vt)

Action for Consideration: Renewal of Recognition after Review of the Compliance Report.

Current Scope of Recognition: State agency for the approval of vocational technical education.

Advisory Committee Recommendation: Vote: 6-0 (Recusal: Etchemendy, Phillips, Rothkopf)
Renew the agency's recognition for a period of one year. Grant the agency's request for an expansion of its scope of recognition to include distance education.

Written Materials Reviewed by the Committee: Compliance report and supporting documentation submitted by the agency, and the Department staff analysis and report.

NACIQI Primary Readers:

John Etchemendy

Representatives of the Agency:

Dawn Lindsley, Accreditation Coordinator, OKSB-vt

Summary of the Committee's Policy-Related Deliberations

III. Overview of the Committee's meeting with Undersecretary Ted Mitchell.

On Thursday, December 11, 2014, the Committee received an update by Mr. Ted Mitchell, Undersecretary, U.S. Department of Education, on the Department's postsecondary initiatives.

Specifically discussed were the President's higher education agenda--accessibility, affordability, and outcomes--and the Department's initiatives to target the very real issues that students and their families face in pursuing their higher education goals. Undersecretary Mitchell described the Department's initiatives to promote innovation and flexibility coupled with a strengthened research agenda geared toward evaluating promising projects for scalability. The Undersecretary also expressed interest in leveraging the talent and expertise of the Committee and to engage in additional conversations with the Committee to explore ways that accreditation can become a partner in finding solutions to the challenges in the larger higher education agenda. After the presentation, a robust question/comment session between Undersecretary Mitchell and the Committee members ensued on student learning outcomes and the role of accreditation in the effort to ensure quality in postsecondary education that is focused on student learning and student outcomes.

IV. Overview of the Committee's Deliberations on the Reauthorization of the HEA

Background:

During this year, the Committee was provided a series of opportunities for learning and discussion in preparation for its development of policy recommendations for the HEA reauthorization. For the June 2014 meeting, panels of higher education experts having various perspectives/considerations for advancing quality in higher education as well as recommendations for changes to the Higher Education Act (HEA), engaged the Committee in discussions, specifically addressing- What are the significant changes? What needs changing from the NACIQI's prior positions? What hasn't been addressed that should be addressed now? And how can NACIQI, as a body, be more effective in advancing the goal?

Following the panel discussions, the Committee's ideas/deliberations coalesced around four areas (and four cross-cutting themes) for further consideration and discussion -

Area #1: Developing recommendations to SIMPLIFY

Area #2: Developing recommendations to enhance NUANCE (in the accreditation/recognition process)

Area #3: Developing recommendations about the relationship between quality/quality assurance and access to Title IV FUNDS

Area #4: Developing recommendations about NACIQI's role and function

Cross-cutting themes across issues are access, innovation, affordability, and quality in the context of each task area.

After the June 2104 meeting, two subcommittees were formed to work on developing ideas and recommendations for those four tasks and to advance a draft set of recommendations that is the topic of the Committee's discussion on December 11, 2014.

The first subcommittee, chaired by Art Keiser, focused on simplifying accreditation and recognition processes and on improving Title IV funding policy. The subcommittee developed recommendations to simplify, in areas such as common language, common definitions, simplification of structure, a zero-base study of regulation, possible alignments across the triad, and ways to reduce the data burden. The Committee also focused on recommendations surrounding the relationship between the quality and quality assurance processes and access to Tittle IV funds --including considering a range of models of financial aid eligibility.

The second subcommittee, chaired by Frank Wu, focused on developing recommendations to enhance nuance in the accreditation recognition process, and considered such things as risk-based accreditation or expedited terms/conditions of reviews of institutions and of agencies. It also focused on the role of NACIQI-- developing recommendations about the role and function of this body, including our role as a policy advisory body, possible assistance in addressing the triad and relationship to the Department staff and expertise.

Committee Discussion:

The Committee's discussion, during the afternoon session, centered on simplifying the accreditation process with continued emphasis (from the Committee's 2012 recommendations) on making documents transparent. The discussion also suggested concurrence for the recommendations developed on nuance with the caveat of not encouraging defined lists of measures that might suggest close-ended requirements.

The Committee's discussion concurred, by and large, with strengthening the relationship between quality assurance and access to Title IV funds. The Committee expressed support for affording institutions the widest range of choice, and accreditors the opportunity to align themselves along sector, institution type, or other alignments that make sense and to remove artificial boundaries of regional accreditation that may no longer serve educational institutions.

The Committee's discussion supported greater clarity on nuance in the accreditation and recognition processes and to sustain the recommendations that have to do with strengthening its role as advisor to the Secretary on larger issues in higher education in ways that engage the Committee in different and more substantive ways.

The Committee concluded with plans to review a final set of draft recommendations and to convene again in the spring 2015 via a virtual meeting to consider the draft for formal adoption.

Third Party Oral Commenters
American Veterinary Medical Association, Council on Education (AVMA-COE)

- 1) Sheila W. Allen, DVM MS, Dean, University of Georgia
- 2) Trevor Ames, Professor and Dean, College of Veterinary Medicine, University of Minnesota
- 3) Eric Bregman, DVM
- 4) Nancy O. Brown, VMD, DACVS, DACVIM, Hickory Veterinary Hospital
- 5) Cyril Clarke, Dean, VA-MD Regional College of Veterinary Medicine
- 6) Mark Cushing, Founding Partner, Animal Policy Group/ATonkon Torp LLP
- 7) Joan C. Henricks, V.M.D., Ph.D., School of Veterinary Medicine, University of Pennsylvania
- 8) Kent Hoblet, DVM
- 9) William Kay, DVM, DACVIM, DABBP
- 10) Deborah T. Kochevar, DVM, PhD, DACVCP, Cummings School of Veterinary Medicine at Tufts University
- 11) Michael D. Lairmore, Dean, School of Veterinary Medicine, University of California - Davis
- 12) Mary Beth Leininger, DVM
- 13) Sheila Lyons, Founder and Director, The American College of Veterinary Sports Medicine and Rehabilitation
- 14) Robert Marshak, DV, DACVIM, School of Veterinary Medicine, University of Pennsylvania
- 15) Eden Myers, DVM
- 16) Phillip Nelson, Dean and Professor of Immunology, Western University of Health Sciences
- 17) Jeffrey F. S. Klauser, Banfield Pet Hospitals, Inc.
- 18) Frank F. Walker, DVM
- 19) Jeffery Newman, DVM, President of the Virginia Veterinary Medical Association



U.S. Department of Education
Office of Postsecondary Education

**NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL
QUALITY AND INTEGRITY (NACIQI)
Agenda**

June 25-26, 2015
8:00am-5:30pm

Sheraton Pentagon City
Galaxy Ballroom (16th Floor)
900 S. Orme St.
Arlington, VA 22204

NOTE: Times listed for agenda items are subject to change.

Thursday, June 25 | Day 1

8:00am | Welcome and Introductions

Susan Phillips, Ph.D., NACIQI Chairperson

Consent Agenda and Procedures

Susan Phillips, Ph.D., NACIQI Chairperson

- Call for third-party oral comments
- Call for removal of any items from the consent agenda
- Move and second consent agenda
- Call for vote on the consent agenda

Consent Agenda | Compliance Report

American Optometric Association, Accreditation Council on Optometric Education (ACOE)
Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)
National Association of Schools of Dance, Commission on Accreditation (NASD)
National Association of Schools of Music, Commission on Accreditation (NASM)
National Association of Schools of Theatre, Commission on Accreditation (NAST)

Consent Agenda | Expansion of Scope

American Psychological Association, Commission on Accreditation (APA)

Standard Review Procedures

Susan Phillips, Ph.D., NACIQI Chairperson

- Primary readers introduce agency petition
- Department staff provides briefing

- Agency representatives provide comments
- Third-party comments
- Agency responds to third-party comments
- Department staff responds to agency and third-party comments
- Discussion and vote

8:45am | Compliance Report | Accreditation Commission for Education in Nursing, Inc., (ACEN)

NACIQI Primary Readers: Frank Wu, J.D.
Jill Derby, Ph.D.

Department Staff: Chuck Mula

Agency Representatives: Marsal Stoll, Ed.D., MSN | ACEN
Mary Lou Rusin, Ed.D., RN, ANEF | ACEN
Sharon Beasley | ACEN
Patrick McKee, Legal Counsel | McKee & Mitchell, LLC

Third Party Oral Commenters

1. Marsha Howell Adams, Ph.D., RN, CNE, ANEF, FAAN | National League for Nursing (NLN)
2. Beverly I. Malone, Ph.D., RN, FAAN | NLN
3. Brother Ignatius Perkins, OP, Ph.D., RN, FAAN, FNYAM, ANEF | NLN
4. Linda S. Christensen, JD, MSN, RN, CNE | NLN

10:45am | Break

11:00am | Department Initiatives

Ted Mitchell, Ph.D., Undersecretary | U.S. Department of Education

11:45pm | Break

12:00pm | Administrative Items (Non-deliberative/NACIQI only) | Department Updates

2:00pm | Compliance Report | North Central Association of Colleges and Schools, The Higher Learning Commission (NCA HLC)

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

Department Staff: Elizabeth Daggett

Agency Representatives: Dr. Barbara Gellman-Danley, President, Higher Learning Commission

Compliance Report | New England Association of Schools and Colleges, Commission on Institutions of Higher Education (NEA CIHE)

NACIQI Primary Readers: George French, Ph.D.
Roberta Derlin, Ph.D.

Department Staff: Rachael Shultz, Ed.D.

Agency Representatives: Dr. Barbara Brittingham, President, Commission on Institutions of Higher Education, New England Association of Schools and Colleges

Recap of Policy Recommendations

Susan Phillips, Ph.D., NACIQI Chairperson

3:30pm | Closing Comments

Friday, June 26 | Day 2

8:00am | Welcome and Introductions

Susan Phillips, Ph.D., NACIQI Chairperson

8:15am | Experimental Sites Initiative | Guidance to Accrediting Agencies

David Musser, Program Specialist | Office of Federal Student Aid
Herman Bounds, Jr., Ed.S., Director | Accreditation Group

9:00am | Complaints Against Accrediting Agencies

Herman Bounds, Jr., Ed.S., Director | Accreditation Group

9:30am | Use of the Consent Agenda

Jennifer Hong, Ed.D., NACIQI Executive Director

10:00am | Break

Committee Discussion | Draft NACIQI Policy Recommendations Report

Consider adoption of the six final recommendations (12-17).

1:00pm | Closing Remarks and Adjourn

Susan Phillips, Ph.D., NACIQI Chairperson

Report of the Meeting

National Advisory Committee on Institutional Quality and Integrity

June 25-26, 2015



_____/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 25-26, 2015 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

The NACIQI was most recently authorized by Section 106 of the Higher Education Opportunity Act of 2008. The 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.

The NACIQI met to carry out its responsibilities with respect to the recognition of accrediting agencies and State approval agencies at its June 25-26, 2015 meeting at the Sheraton Pentagon City, 900 South Orme Street, Arlington, Virginia. Undersecretary Ted Mitchell addressed the NACIQI regarding the Department's postsecondary initiatives. Following the NACIQI's review of agencies for recognition, the Committee continued its discussion of policy recommendations to the Secretary in preparation for the reauthorization of the HEA.

The NACIQI reviewed compliance reports from eight accrediting agencies and one request for an expansion of scope. Except for recommendations regarding two accrediting agencies, the North Central Association of Colleges and Schools, The Higher Learning Commission (NCA HLC), and the Accreditation Commission for Education in Nursing, Inc. (ACEN), the NACIQI's recommendations concur with the staff recommendations. The NACIQI reviews all information submitted by an agency in support of its petition, as well as the staff analysis and report.

NACIQI members in attendance for all or part of the meeting included Susan D. Phillips (Chair), Arthur Keiser (Vice Chair), Kathleen Sullivan Alioto, Simon Boehme, Hank Brown, Jill Derby, Roberta Derlin, George French, Anne Neal, Richard O'Donnell, William Pepicello, 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, Sally Morgan and Donna Mangold (Office of General Counsel), Elizabeth Daggett, 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 (Recusals: Derby)

Move to recommend that the Assistant Secretary accept the recommendations as stated on the Consent Agenda for those agencies listed.

American Psychological Association, Commission on Accreditation (APA)

Recommendation: Expand the agency's scope as requested.

NACIQI Primary Readers: Anne Neal, Kathleen Sullivan Alioto

American Optometric Association, Accreditation Council on Optometric Education (ACOE)

Recommendation: Renew the agency's recognition for two and one half years. As requested by the agency, remove the following preaccreditation category from the ACOE scope of recognition: Candidacy Pending for optometric residency programs in Department of Veterans Affairs facilities.

NACIQI Primary Readers: Federico Zaragoza, William Pepicello

Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)

Recommendation: Renew the agency's recognition for two and one half years.

NACIQI Primary Readers: Arthur Keiser, Hank Brown

National Association of Schools of Dance, Commission on Accreditation (NASD)

Recommendation: Renew the agency's recognition for four years.

NACIQI Primary Readers: Federico Zaragoza, Richard O'Donnell

National Association of Schools of Music, Commission on Accreditation (NASM)

Recommendation: Renew the agency's recognition for four years.

NACIQI Primary Readers: William Pepicello, Simon Boehme

National Association of Schools of Theatre, Commission on Accreditation (NAST)

Recommendation: Renew the agency's recognition for four years.

NACIQI Primary Readers: Cameron Staples, Roberta Derlin

The following agencies were acted on using the NACIQI's standard review procedures:

Accreditation Commission for Education in Nursing, Inc. (ACEN)

Action for Consideration: Review of compliance report

Recommendation: Vote 7-0 (Recusals: Keiser, Pepicello, Zaragoza, Derlin)

Move to recommend adoption of the staff report that ACEN be found to not meet the requirements for recognition, specifically that it be "separate and independent." It makes this recommendation without expressing any view on the corporate structure of ACEN, other than it must comply with the requirement that it be "separate and independent." NACIQI observes that there are authorized accrediting agencies that function within a larger corporate structure, as well as those that are fully stand

alone. It also recommends, consistent with regulations, that the record be open for a period of three months to allow supplementation with new information not available at this time, regardless of the party that submits that new information.

Discussion: The NACIQI agrees with adoption of the staff recommendation regarding the non-compliance finding, but adds further language to clarify the NACIQI's neutrality with regard to the corporate structure of ACEN to deter the agency's use of the NACIQI's recommendation in its current legal dispute with the agency's parent association in the state of New York. The NACIQI further adds language to its recommendation to keep the record open for three months as to allow supplementation of new information which may bring the agency into compliance. The NACIQI's recommendation would permit review of this information, should it be provided by the parent association and not by the accrediting agency.

NACIQI Primary Readers:

Frank Wu, Jill Derby

Representatives of the Agency:

Dr. Marsal Stoll, Ed.D., MSN, ACEN

Dr. Mary Lou Rusin, Ed.D., RN, ANEF, ACEN

Mrs. Sharon Beasley, ACEN

Mr. Patrick McKee, Legal Counsel, McKee & Mitchell, LLC

Third Party Commenters:

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Beverly I. Malone, Ph.D., RN, FAAN, NLN

Brother Ignatius Perkins, OP, Ph.D., RN, FAAN, FNYAM, ANEF, NLN

Linda S. Christensen, JD, MSN, RN, CNE, NLN

Peggy Walters

Linda Miles

Kathleen Hudson

North Central Association of Colleges and Schools, The Higher Learning Commission (NCA HLC)

Action for Consideration: Review of compliance report.

Recommendation: Vote of 7-4 (Recusal: Derlin, Pepicello)

NACIQI recommends that the Assistant Secretary renew the agency's recognition for two and one half years. And require the agency to come before NACIQI to discuss retention, persistence, and completion rates at the next NACIQI meeting.

Discussion: The NACIQI agrees with adoption of the staff recommendation regarding the agency's recognition, but adds further language to require the agency to provide an oral discussion at the next meeting regarding retention, persistence and completion rates. The recommendation was an outgrowth of discussion regarding the graduation rates of some of the institutions accredited by the accrediting agency. This discussion evolved to the NACIQI's role and authority in asking outcome-oriented questions of recognized accrediting agencies to help inform the NACIQI's role in providing policy recommendations to the Secretary.

NACIQI Primary Readers:

Anne Neal, Simon Boehme

Representative of the Agency:

Dr. Barbara Gellman-Danley, President, Higher Learning Commission

New England Association of Schools and Colleges, Commission on Institutions of Higher Education (NEA CIHE)

Action for Consideration: Review of compliance report.

Committee Recommendation: Vote 11-0 (Recusal: Staples)

NACIQI recommends that the Assistant Secretary renew the agency's recognition for a period of two and one half years.

Discussion: The NACIQI concurred with the staff recommendation, and continued its line of questioning with regard to graduation rates, and its discussion regarding student outcomes.

NACIQI Primary Readers:

George French, Roberta Derlin

Representative of the Agency:

Dr. Barbara Brittingham, President, NEA CIHE

UNDERSECRETARY TED MITCHELL

On Thursday, June 25, 2015, Undersecretary Ted Mitchell presented to the NACIQI regarding the Department's postsecondary initiatives. Undersecretary Mitchell was joined by Deputy Under Secretary Jamie Studley.

The Undersecretary began by thanking the NACIQI for its work, and highlighted the importance of accreditation within the Department's overall higher education agenda. In light of the President's North Star goal for postsecondary degree attainment, the Undersecretary outlined three topics: access, affordability, and high-quality outcomes. Undersecretary Mitchell then provided a summary of the Department's work in each of these topical areas. He stated that the focus on outcomes is where the NACIQI and the Department can work together. Undersecretary Mitchell also discussed "risk-based" accrediting as an exciting opportunity for the accreditation process; the importance of transparency and common definitions/processes among accreditors; improved communications between the Department and the NACIQI; and improved communications between the Department and accrediting agencies. The Undersecretary's comments were followed by questions and comments from NACIQI members, at which time the Undersecretary underscored the importance of the triad in ensuring educational quality, and the need for accreditation to be flexible to new modes of delivery.

EXPERIMENTAL SITES INITIATIVE

On Friday, June 26, 2015, David Musser, Office of Federal Student Aid, presented information regarding the Department's Experimental Sites Initiative. Congress authorized the Department to conduct limited experiments that allows the Department to waive certain statutory and regulatory requirements in order to determine how changes to those requirements might improve the administration of the Title IV program, or improve student outcomes. The presentation was followed by questions and comments by NACIQI members.

USE OF THE CONSENT AGENDA

On Friday, June 26, 2015, Jennifer Hong, Executive Director, reviewed the NACIQI's criteria for placing an agency on the consent agenda, to include: 1) No compliance issues identified in the final staff report; and 2) No oral commenters. Referencing the statutory provision under 20 USC 1099b(n)(2), which states that the Secretary will place a priority of review for those agencies that either are the subject of the most complaints or that accredit institutions that participate most extensively in Title IV programs, she raised for discussion whether members wanted to continue with the current consent agenda criteria, or exclude agencies from the consent agenda that are determined to fall into either of those categories. NACIQI members discussed the consent agenda and decided to continue with the current criteria for placing an agency on the consent agenda.

COMPLAINTS AGAINST ACCREDITING AGENCIES

On Friday, June 26, 2015, Herman Bounds, Director, Accreditation Group, discussed the different types of complaints received by the Accreditation Group, how staff responds to complaints, and that staff will begin to incorporate the number of complaints filed during an agency's recognition period in the final staff report.

2015 DRAFT NACIQI POLICY RECOMMENDATION REPORT

The NACIQI edited and finalized the 2015 draft policy recommendations. NACIQI members emphasized the importance of timely distribution of the document in its final form. This document is posted on the NACIQI Web site.

REPORT TO THE U.S. SECRETARY OF EDUCATION

Higher Education Act Reauthorization 2015 Accreditation Policy Recommendations



U.S. DEPARTMENT OF EDUCATION

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY

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

July 2015

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NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS

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* The Committee is composed of 18 members of which six are appointed by the Secretary of Education (ED); six are appointed by the Speaker of the House of Representatives (H); and six are appointed by the President Pro tempore of the U.S. Senate (S). The appointing authority of each member is noted.

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS

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**NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS**

Introduction

Over the past year, the members of NACIQI identified the need to extend its formal policy agenda. With the **2012 NACIQI Policy Recommendations** over two years old, and with a renewed focus on concerns in higher education and the HEA reauthorization, we set out to identify the new, or renewed, areas about which we would recommend policy change.

To develop our agenda, we drew not only on the **2012 NACIQI Policy Recommendations**, but also on the expertise of a number of policy and thought leaders in higher education through invited policy papers, background readings, and panel presentations. We identified specific areas about which we thought that additional recommendations were needed at this time to simplify the accreditation and recognition process and to enhance nuance in that process, to reconsider the relationship between quality assurance processes and access to Title IV funds, and to reconsider the roles and functions of NACIQI itself. We approached these areas with issues of access, innovation, affordability, and quality in mind. We have not included consideration of what Committee, staff, Department, regulation, or statutory actions would be needed to move these recommendations to implementation.

In advancing the series of recommendations, we commend to the reader the **2012 NACIQI Policy Recommendations**¹, which provides recommendations that remain important to consider. The new set of recommendations, below, represents additional contributions to the larger policy conversation in service of enhancing our higher education system for all students. NACIQI recognizes the value of input from students and other stakeholders in the accreditation process.

Toward simplifying and enhancing nuance in the accreditation and recognition process

To begin, we noted the wide variance that exists in accreditation terminology, processes, and timelines across accrediting agencies. This variance results in confusion and a lack of transparency and does not appear to serve the public interest well. To address this, we see a need for more conformance across the accreditation process, including more concise, factual self-studies and other final reports that are supported by technology, to better serve the public and provide more transparency to the accreditation process. We recommend:

¹ <http://www2.ed.gov/about/bdscomm/list/naciqi-dir/2012-spring/teleconference-2012/naciqi-final-report.pdf>

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS

- 1. Encourage accreditation agencies (both programmatic and institutional) to develop common definitions of accreditation actions and terms procedures, timelines, process (i.e., electronic) including due process and substantive change.**

We also support initiatives to evaluate and assess the impact of Departmental regulations (criteria and recognition procedures) on the accreditation process with the intent to streamline the regulations, eliminate duplication, and to minimize the regulatory burden. We recommend:

- 2. Require a periodic Departmental review of the criteria for recognition (regulations) with the intent to streamline the regulations, eliminate duplication, and to minimize the regulatory burden. (This recommendation is not intended to limit Departmental review to these areas.)**

We also noted that the current review structure for accreditation, and also for recognition, is too rigid to adequately address the uniqueness of institutional missions. There is a need for a more differentiated process that allows for different levels of accreditation, for more transparency and openness in the accreditation and the recognition processes, and a greater emphasis on student achievement and student outcomes. Specific standards-setting authority within those mission-essential areas lies expressly with the accrediting agency. We recommend:

- 3. Re-focus NACIQI reviews to direct greater attention to assessing the role of an accrediting agency in assessing the health and well-being and the quality of institutions of higher education, rather than on technical compliance with the criteria for recognition. These reviews should be supported by staff analysis that focuses on the effectiveness of the accrediting agency in performing its work, rather than technical compliance.**
- 4. Direct NACIQI to identify the essential core elements and areas of the recognition review process that accrediting agencies are required to take into account for recognition purposes, focusing on student learning and student outcomes. It is expected that NACIQI would identify both the essential areas to include in the recognition process as well as those to exclude.**
- 5. Grant accrediting agencies greater authority to develop standards tailored to institutional mission; to create different substantive tiers of accreditation; and to use different processes for different types of institutions, including expedited processes.**

NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS

6. **Establish that the recognition review process differentiate among accrediting agencies based on risk or need with some identified as requiring greater levels of attention, and others lesser and establish that recognition recommendations and decisions include different objective gradations of approval of accrediting agencies and different recommendations as to the amount of time within which an agency is allowed to achieve compliance.**

In advancing the interest in transparency, we also repeat here a recommendation made in the 2012 NACIQI Policy Recommendations:

7. **Make accreditation reports about institutions available to the public. Further discussion is needed about what reports to include, and about how to increase information and transparency while sustaining other critical values in the accreditation process**

Toward reconsidering the relationship between quality assurance processes and access to Title IV funds

We noted that routes to accessing Title IV funds are currently restricted to existing systems and structures that may not provide sufficient flexibility for innovation and progress. We recommend:

8. **Afford institutions the widest possible array of choice of accreditor for access to Title IV funds, including all place-based accreditors. Encourage place-based accreditation agencies to expand their scope. Provide greater flexibility for institutions to re-align themselves along sector, institution-type, or other appropriate lines. Allow for alternative accrediting organizations.**

We noted the need to provide ways for new and innovative mechanisms of quality assurance to surface and to serve as potential guarantors of quality.

We see an opportunity to create a risk-adjusted approach to accreditation that would free up accrediting agencies and the Department to have more time and resources to focus on institutions that pose the greatest quality concerns. We recommend:

9. **Establish less burdensome access to Title IV funding for high-quality, low-risk institutions.**

**NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS**

We envision that a less burdensome route to Title IV funding access would entail expedited recognition, possibly through a simplified data reporting process. To insure that data is relevant and useful, and that reporting is accurate, we recommend:

- 10. Before eligibility for Title IV, require institutions to provide audited data on key metrics of access, cost and student success. These metrics would be in a consistent format across institutions, and easy for students and the public to access.**

Toward reconsidering the roles and functions of the NACIQI

Decisions on many of the recommendations above would be necessary to fully shape a more effective role for NACIQI. Pending that outcome, we think it is necessary to clarify and better define the role and each step regarding the NACIQI's role going forward and to ask what assessment options best ensure that an adequate level of quality education is offered by the institutions accredited by a recognized accreditor. We recommend:

- 11. Reconstitute the NACIQI as a committee with terminal decision-making authority and a staff. This will establish NACIQI as the final decision-making authority on accrediting agency recognition. In addition, ensure that the staff recommendation is provided to the NACIQI for its consideration and that the NACIQI decision will be the singular final action communicated to the senior Department official. NACIQI would have authority similar to that of the National Committee on Foreign Medical Education and Accreditation (NCFMEA).**

Finally, we expect that facilitating an improved communications process will require better-defined and clearer communication opportunities between the Department and NACIQI and other policy bodies. We recommend:

- 12. Establish that the NACIQI and the Education Secretary and other Department officials meet periodically for mutual briefings and discussions, including policy issues, and resulting in policy recommendations.**
- 13. Establish that the NACIQI, itself, timely disseminates its reports to the Department and to the appropriate Congressional committees.**

**NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY
2015 ACCREDITATION POLICY RECOMMENDATIONS**

ACKNOWLEDGMENTS

The National Advisory Committee on Institutional Quality and Integrity (NACIQI) is indebted to many individuals for their invaluable contributions to the completion of this report. We are grateful to our many colleagues and constituents who provided written and oral comments; they were enormously helpful in our deliberation of the complex accreditation issues. We also acknowledge with sincere appreciation the following individuals and organizations for sharing their insights and knowledge to help us in framing the issues, pointing out difficult parts of the conversation, and providing a context as we took up these very challenging issues:

Clifford Adelman, Senior Associate, Institute for Higher Education Policy

Judith S. Eaton, President, Council on Higher Education Accreditation

Terry W. Hartle, Senior Vice President, Division of Government and Public Affairs, American Council on Education

Susan Hattan, Senior Consultant, Government Relations, National Association of Independent Colleges and Universities

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U.S. DEPARTMENT OF EDUCATION
Office of Postsecondary Education

National Advisory Committee on Institutional Quality and Integrity

Current Members List (including nomination source)

1. **Dr. Kathleen Sullivan Alioto** (House Democrat)
Strategic Advisor, Fundraiser, and Consultant
2. **Mr. Simon Boehme-Student Member** (Education Department)
Mitchell Scholar
3. **Mr. George Hank Brown** (Senate Republican)
President Emeritus, University of Colorado
4. **Dr. Jill Derby** (Senate Democrat)
Senior Consultant, Association of Governing Boards of Universities and Colleges
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6. **Dr. John Etchemendy** (Education Department)
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10. **Ms. Anne D. Neal** (Senate Republican)
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15. **Mr. Ralph Wolff** (House Democrat)
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16. **Mr. Frank H. Wu** (Education Department)
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18. **Vacant** (House Republican)