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RESUME NACIQI POLICY DISCUSSION

ADJOURN
MR. KEISER: Good morning everyone. This is day 3 of our NACIQI meeting. It’s actually our winter meeting but now it’s a little later in the year. This morning we are going to have a presentation on the scorecard that we have been receiving and I think that’s pretty much the whole agenda. You’re on.

MR. SCHAK: Okay can everybody hear me? I think we have a short deck so Jenn should we wait a few minutes for that?

MS. HONG: Yes it is coming right up. Right now I can go ahead and introduce you. I’m very happy to introduce Oliver Schak. Oliver is from our Office of Planning, Evaluation and Policy Development, OPEPD and he’s going to help us learn more about the updates to the accreditor dashboards.

This was also in your preparatory materials and a recorded webinar. It was one of the recorded webinars so for the benefit of the public we also wanted to point to some of the updates that were made.

So this morning we are just going to continue our discussion on the Pilot project so the accreditor dashboard on the metric site you all identified as wanting to see on the dashboards was wrapped up into the Pilot project so we will need a Motion before we leave here today as to you know, any amendments that
you want to see to the dashboard. Any kind of improvements
going forward as well as whether we want to also continue using
the metrics that we have identified on the dashboard going forward
during our review of accrediting agencies.

And as always these presentations that you have
seen at NACIQI today will be posted on the website. Some of
them are already posted on the website under the heading, Archive
of Meetings and then February 2017.

If you scroll down all the presentations that you
have seen at this meeting should be posted there. I don’t know that
we are going to resolve this any time soon so you know if you have
access to the internet again archive meetings under HTTPS and the
site is ed.gov/NACIQI/archiveofmeetingsfebruary and this is the
accreditor dashboard presentation.

We apologize we are having issues with our AV
equipment so while we get that up --

MR. SCHAK: I think I can start right in. I think
the main reason we need that is we have a few discussion questions
we would like to tee up and it would just be helpful to have those
up there. But I think I can work through much of the same
material.

So I’m Oliver Schak. I work for the Office of
Planning Evaluation and Policy Development Policy and Program Study Service. And I have been working for the last 3 ½ years on various data initiatives and one of them is the accreditor dashboards.

I think I'll be pretty quick with overview because we want to get to the discussion pretty quickly. I would just say that there are sort of three principals that we are trying to follow in developing the dashboards. One is we want the information to be accurate and reliable.

Two -- we would like for the information to be fairly comprehensive and reliable across different agencies and then the third one is that we would like the data and the methods we use to be fairly transparent and we get at that a little bit by releasing both a data file along with the dashboards.

I would say that's fairly difficult as probably you all know. So we had some presentations on Wednesday about what different agencies do and also from groups like C-RAC and they talked quite a bit about the diversity of institutions and the diversity of missions and it is hard to sort of summarize all of that in a set of dashboards.

I think another difficulty is that each individual accreditor can really have its own sort of unique characteristics.
ACCJC is a good example of that. You have sort of the specific structure where they focus on 2 year institutions. They also really have California as a focal point, you know, having one state like that also is evident.

So in terms of what we released just to recap -- we had a slide in the deck that sort of overviews what’s in the data file and also what’s in the PDF dashboards just to say that they kind of report two different audiences.

The data files are really for the agencies and also for researches. The dashboards I think have been used quite a bit through these deliberations. There are also some key limitations as you all know one of the big ones is that we don’t really have much on programmatic accreditation and the programmatic accreditors and that came through especially during this meeting.

On the next slide we would have some information about sort of the changes that we have made in the latest iteration and I would say that for the most part the changes we have made are fairly esthetic. We have changed some things about the coloring scheme and things like that.

We did sort of enhance both the data file and the dashboards with a few additional data points. Probably the most substantive change we made was that although we continued to
include both repayment rate and CD cohort default rate in the data file on the accreditor graphical dashboards we switched cohort default rate into there -- into those dashboards instead of repayment rate.

And if you are just wondering there are really two rationales behinds that. One was that we did some data analysis that indicated that those two measures are fairly strongly negatively correlated so the higher the repayment rate is the lower the cohort default rate is and that’s pretty consistent.

So we sort of favored cohort default rate because folks tend to be a little bit more familiar with that measure. We also noted that in the webinar that cohort default rate includes graduate students and repayment rate from the scorecard -- college scorecard only includes undergraduate students and that can be important for some accreditors that focus on graduate students.

So with that I think the next step in this presentation was actually to go into discussion questions for the Committee but before I go into that are there any sort of clarification questions outside of substantive policy?

MR. KEISER: I have a question. Where are you pulling the raw data from for the different measures?

MR. SCHAK: That’s a good question -- so there
are a number of sources that we draw from. The main source is the
college scorecard and then the college scorecard is actually
drawing from IPED’s so graduation rate measures, enrollment,
measures like that are coming from IPED’s.

We also draw information from federal student aid
so they release a number -- quite a bit of data on aid volume,
cohort default rate so we receive data from them on those sorts of
measures.

HCM2 is also actually from federal student aid.

One other measure we look at is earnings and I should note that
those actually -- the cohort comes from federal student aid and
their data systems but the earnings data themselves come from
Treasury and IRS. So that is sort of a high level of review sources
that we are drawing from.

MR. KEISER: If you use IPED’s data, IPED’s only
first-time students it’s not a broad review of all the students,
doesn’t that skew the data especially for institutions that are
heavily influenced by adult learners like community colleges and
vocational schools?

MR. SCHAK: Right it can be a real limitation for
some accreditors that focus on sort of the less than 4 year
institutions. It’s one of the reason we provide that breakdown of
the institutions by 4 year and above versus below and also by control. So ACCJC -- I actually looked at the data file and the majority of their students are not first-time full-time.

One thing that I would note, you know, is you have to ask the question, you know, if we look at all students are those outcomes going to look better? You know in some ways first-time full-time those are the students that are most likely to complete actually but another major limitation that I would note that is applicable to the community colleges is that it doesn’t capture transfers from 2 year to 4 year as a positive outcome.

And that is, I think, a fairly significant limitation.

MR. KEISER: Well one of the agencies that we looked at yesterday -- you have a specific standard on the number of students -- the caption was degree seeking. Now when you have an agency that has significant number of certificate programs non-degree seeking students, does that exclude those students?

MR. SCHAK: Yes so in the read me we indicate that it includes both degree seeking and certificate seeking so that that is sort of short-hand. So as long as the student is seeking some sort of degree, whether it is certificate or Associate, Baccalaureate, et cetera those undergraduates are captured.

MR. KEISER: So if a student does not declare a
major then they are not counted?

MR. SCHAK: No they are still counted if they intend to actually complete a degree. That’s how IPED’s counts it.

MR. KEISER: So is that title wrong so that it’s, you know, because degree seeking -- when I think of degree seeking it is an Associate’s Degree, Bachelor’s Degree, Master’s, Doctoral but a certificate in let’s say culinary arts or a certificate in cosmetology I don’t know that that is a degree.

Am I missing -- is there something there that I don’t understand?

MR. SCHAK: I think that is a fair comment and we can I think tweak the language on that.

MR. ZARAGOZA: Yeah Arthur I mean this to me is you know, a very important discussion because working for a community college obviously we live with kind of the image that is projected at times and the data many times does a disservice for community colleges in terms of the various populations that are served.

But clearly nationally 62% of the students in community colleges are part-time so they are not in your database. About 20% of those students are not seeking a Bachelor’s Degree and they are applied science major so that wouldn’t be in the data.
The other major mention to kind of the data is that for community colleges a vast majority of students that come in that are degree seeking pursuing the Bachelors’ are not college ready so they go into remediation mode and obviously you know, they are not differentiated from what would be a traditional college ready student. So I think the discussion speaks to the need to look at some of the community colleges and really try to come up with systems that are much more accurate in kind of projecting what’s happening to students. Another mention to all of this too is that using UI database for wages -- you said it was treasury and --

MR. SCHAK: IRS.

MR. ZARAGOZA: IRS right so that would be -- what is the gap -- how timely is the data that we are getting -- because the data that I get is 2 years old for community colleges when I am looking at my performance evaluations.

MR. SCHAK: Right so I think the measurement period for those data would be in its 2 years, kind of pull it together, 2012 and 2013 so you are right there is somewhat of a gap.

MR. ZARAGOZA: So we are getting a snapshot
and often times, especially a lot of our workforce students move very quickly up through a progression and so wages sometimes and I think you heard that earlier with looking at entry level versus middle skill kind of individual there’s clearly a difference in the labor market experience.

So again several observations -- you know I still think what we have got is better than nothing but obviously much could be improved.

The last point that I will make is a lot of the accreditation agencies use self-reported data and I don’t know how much of that migrates into some of these profiles if any.

MR. SCHAK: So I think the data that agencies have been collecting themselves and that they have referred to we don’t use those data, we use federal sources. I will note that the IPED’s you know, that is basically self-reported.

MR. ZARAGOZA: Yes.

MR. KEISER: Claude and then Brian.

MR. PRESSNELL: Staying on the earning’s piece -- so the earnings as I read it is from -- is 6 years after they begin the program, is this correct? Based on your early definition?

MR. SCHAK: So actually we have used different -- so there are two variables in the data file. One is percentage of
students earning greater than $25,000 and that is sort of a shorter
term measure that is 6 years after. There’s another measure that is
median earnings 10 years after and that’s actually what’s in the
sort of graphical display.

MR. PRESNELL: Okay based from the point of
starting the degree not from the point of completing the degree,
correct?

MR. SCHAK: That is correct.

MR. PRESNELL: And it is not adjusted according
to any institutional type so if it is a 2 year institution it is 10 years
out, if it is a 4 year institution it is 10 years out so I mean I just -- I
think it is obviously quite problematic you know, and I am trying
to figure out too who is not included in this?

Right so I think the data here are exceptionally
limited and we have got a very, very narrow view of what we are
looking at so I would caution the Committee and anyone who uses
this data as to drawing very broad-based conclusions on it.

I think it provides us some general context but it is
not conclusive enough that we should make decisions around this
data pertaining to agencies or institutions. Because I just think that
until we can get it figured out I have got an issue with just putting
data out there just because we can do it even though it may not be
reflective of actually what’s happening in life.

And so do I also understand that it does not include those who go to work for government agencies? Does it include government agency employment? Are those data in there?

MR. SCHAK: Yes I’m not -- disclaimer I’m not the authoritative source on IRS data but anyone who sort of files their taxes should be included in there, yes.

MR. PRESSNELL: It’s pulled directly from there so I would think that’s one improvement I think for sure. The other thing I wanted to ask about if I might is on the loan volume piece this again doesn’t differentiate for institutional type right?

So if we are looking at -- if we are going to look at the -- like a regional accreditor that has an exceptionally diverse institutional set type it is going to lump everybody under that agency into that completely right?

And so for instance I have got a member institution in Tennessee, the Southern College of Optometry and I think their average indebtedness is about $300,000 the default rate is zero. They haven’t had a defaulter in a decade because the earnings, you know, for an optometrist is significant enough that it is able to offset that.

So I’m trying to figure out the value of what we get
from that when we can’t differentiate from institutional type within these regional accrediting bodies. So it just really makes it I think -- well put it this way again I think it gives us a very broad context that is not bad -- I think that’s helpful.

But I think that anytime we look at it we have to have a conversation about alright well who is this agency, who do they accredit, what does their population look like and let’s make sure that we take that into account not just simply compare SAC’s COC to a junior, you know, community college accreditor or something because the numbers should look different.

And I don’t know that there would be a way to do it because again it’s a dashboard right so it is intended to be summation data.

MR. KEISER: Brian?

MR. JONES: I want to add a few blows to the dead horse in the grad rate and the first-time full-time issue. And you know first I would say that this is an issue that affects not just community colleges but all adult serving institutions.

You know I lead a 4 year Degree granting institution where less than 2% of our students are first-time full-time. And so I agree with Claude and with Federico that -- and Art who have made the point that you know, I do think that this data is
not terribly useful and I would argue misleading at some level.

But I think the frustration with the question is -- is you know, this is an issue that has been around a long time. I was at the Department from 2001 to 2005 and the same issue was being raised at that time.

And so I guess one question for you is are there is what is the limitation that you face in terms of providing some greater perspective around graduation rates -- are there legal limitations, are there practical data collection limitations?

Because it seems to me so we are a Middle States institution and one thing that Middle States has begun to do I think to their great credit is they are requesting institutions like ours, a much broader range of completion data.

So we provided to Middle States last year completion data on our first-time full-time students, on our first-time, part-time students, our non-first-time part-time students and our non-first-time full-time students to help give them a more complete picture and so I am curious why the Department couldn’t collect similar data?

Or, at a minimum why in the context of the scorecard why at a minimum there wouldn’t be some notation for each institution around its grad rate at least at what percentage of
the students actually are full-time -- first-time full-time. I just
don’t understand why some fix hasn’t occurred to date.

MR. SCHAK: It’s a great question. So one thing I
note is in the data file we actually do include the percentage of
first-time full-time students and I think we would be open to if the
Committee is interested in actually displaying that on the
dashboards -- it’s kind of all a balance of you have a certain
amount of space and how much can you include there.

The other thing I would say is so we were able to
fear out our technical difficulties and I think many of your points
related -- actually to our discussion question so discussion question
number 5 we asked about additional measures.

And one possibility is looking into a more inclusive
completion rate and I can talk a little bit more about what I think
could become available in the next few years from NCES on that
front.

But we could basically in short there is a possibility
of having a graduation rate that includes all students, not just first-
time full-time. A few years down the road we will have some
possibility of looking specifically at PELL students and we would
also have an ability to look at how many students are transferring
within a cohort?
What we would not have is whether they transfer and they complete but we would have transfer. And the final thing I would note about sort of a component to IPED’s is working on is I believe it’s the case that they measure 6 years out and 8 years out for all institutions and that’s very different from the traditional graduation rate measure which is sort of 150% normal time.

MR. KEISER: I think -- Kathleen?

MS. SULLIVAN ALIOTO: As a community college advocate I have to agree with my colleagues about you know when you have -- community colleges serve more than half of the students enrolled in public colleges and one-third of students overall.

So why don’t we have -- if we are talking about half of the students in America in public institutions why don’t we have -- instead of saying less than 4 years just have a designation community colleges and then really focus on the differential in the mission that community colleges have already stated.

I mean it seems quite inaccurate not to have a specific category.

MR. KEISER: Claude?

MR. PRESSNELL: Can I ask again -- just where do you get the student identifiers for the -- to get the salary
information? I mean how do you get them in order to identify what student goes to what institution to say how many -- you know where these salary ranges come from?

MR. SCHAK: So as I said the cohort is generated from federal student aid data.

MR. PRESSNELL: These are only aid recipients?

MR. SCHAK: That is correct.

MR. PRESSNELL: So not non-aid recipients?

MR. SCHAK: Yep.

MR. PRESSNELL: Ah.

MR. KEISER: That’s the same thing with gainful employment.

MR. PRESSNELL: Yeah but also -- then let me ask you this -- since you have aid recipients back since the beginning of time why are we so limited to looking at such a short period of income time? Why can’t we go back further? And, I mean you have those identifiers back decades ago, identify them assuming with institutions because that is who we distributed the aid to -- why can’t we go back and look at 30 years out, get some mid-career and then late career. I think you are going to see a very, very different thing. The only reason I say that is that you know I got my
undergraduate degree in religious studies. I got my Master’s in Greek and I was living in poverty I’m sure for 3 or 4 years after that. I would be dragging my institution in the ditch on this but you know I think I’ve done okay with my life and I’m doing pretty well now but this would not -- alright it’s debatable, got you -- it’s debatable.

And I would definitely concede it’s debatable. But the point being it really doesn’t reflect well on my institution. I probably didn’t -- earning wise, well first of all if your whole mission is about earnings, that’s a whole other discussion but my earnings far exceeded probably what they expected.

So you see where I am going with it is that we are taking this very early on snapshot and we are trying to evaluate institutions and agencies based on these early, early, early earnings.

Aid recipients only and that’s just all very -- it has to be exposed as major limitations in what we are doing. And I am just wondering is there any reason why we can’t go back further?

MR. SCHAK: So that is sort of a question where as I said before I don’t work for federal student aid. And a lot of that I think has to do with sort of operational limitations in their systems.
I would say that I think college scorecard when it released the earnings data it tried to do kind of as much as it possibly could. But we could definitely take back that feedback and see if it is at all possible to go sort of even further after enrollment so to speak.

MR. KEISER: Frank, Steven, Frank first.

MR. WU: So I have some positive comments about data. I think data is great, we should have data we should have as much as possible so I want to frame this positively. It is important though that we have the right data and that what we look at actually be true to the reality so I just wanted to offer three comments, all positive.

First is it is great that you are here. We should have you every meeting. We should be looking at this and asking how do we revise and I would welcome your thoughts. You do this every day we do this twice a year and I would invite the staff more generally is as you look at the data you realize this indicator is the wrong indicator.

You pointed out you had a choice between two different measures that correlated highly and you picked the one that made more sense, that’s great. If you look at something and you think this is misleading or there’s a better measure I hope staff
will tell us about that. Great, okay so that’s the first point.

I hope we make this much more regular, that we revise, that we talk about how do we improve this dashboard for the benefit of the public and the students.

The second point is I think there is a consistent or persistent mathematically problem that runs through all of this that many of the comments touch on. It’s a numerator/denominator problem. What I mean by that is we often as we look at the dashboards we don’t know what the denominator is and that skews things.

So if it is a percentage we need to know is that a percentage of the total universe of students, a percentage of FITIACS, a percentage of students that have financial aid and so on. Because if we don’t have the denominator or if the denominator is inconsistent across different types of institutions or there is a wide fluctuation in the denominator then you can’t compare the percentages that you get.

Just as a matter of science. So this isn’t -- and math, this isn’t a comment that is pro one side or the other side it is just that the data should show if it is a percentage of what. So there’s a simple fix to that which is every time you show a proportion just specify the denominator is whatever it is.
Whether it is all students, all FITIACS, FITIACS in financial aid, first-time, it’s FITIAC is that how it is spelled? Yeah First Time in Any College.

MR. KEISER: Thank you I did not know that.

MR. WU: That comes from IPED’s right?

MR. SCHAK: Um-hmm.

MR. WU: Great so I taught you a new word.

MR. KEISER: I didn’t think that was possible.

MR. WU: I don’t think anyone uses that term who isn’t a real higher education data geek but I figured you would know the word FITIAC.

Third and finally I have a thought -- and this is beyond the scope of NACIQI’s work in general but a couple of times in the past few years we have had studies and issued white papers and talked about potential changes.

And there is one way to fix a lot of this and so I just wanted to put in a plug for something that I think would be good something we have discussed in the past and that’s a student unit record system.

Which if you don’t follow this -- it’s a really interesting issue it does not break down liberal, conservative lines.

So for example the ACLU is against student unit records on the
grounds of what they could be used for. And for those of you who
don’t follow this -- that’s the idea of having a single federal
government identifier for every higher education student to track
them.

The big issue that that deals with is transfers and as
I understand the data only a minority of students in higher
education today graduate within 4 years from the same institution
they started out, that’s a distinct minority.

So if you use that as a measure and even if you go
up to 6 years you just don’t capture so many students that a student
unit record system would allow you to track. So those are my 3
points. First it is good that we revised it that we talk. Second if
you just think about the numerator/denominator issue because
mathematically that’s a problem that just runs throughout the data.

But it has a fix which is to specify percentages of
what -- and last is a unit record system would deal with a lot of
this.

MR. KEISER: Steven?

MR. VAN AUSDLE: Well thank you Mr. Chair. I
was thinking back to the first presentation we had and I think it
was the regional accreditors talking about having an update on
what’s going on, state of the art and data collection and they talked
about going to other databases that we have to measure student outcomes. And the trend that I have seen, especially I think at the institutional level is for much more accountability.

I mean we are measuring student learning now and we are measuring student participation rates, retention rates, completion rates and then we are following these students into the future through the employment security data as long as you want it.

And I think what we are finding at the institutional level we need more data than anybody to make informed decisions. You have to know what the labor market predictions are, if you are going to try to align your programs -- so I think as the accreditors we need to see that institutions are required.

I think it is a requirement in most regions now that they have assessment offices that are doing this. I can see small institutions now with staffs of four people that do nothing but track students before completion, at completion and beyond completion so it becomes a flow process.

And amazing our experience was primarily through the Aspen Institute where they came in and spent a lot of money following our students and verifying. And it was a little bit limited, IPED’s was a bit limited but ENCHAMS the others, really enhanced that data.
That organization might be worth a call because
they have defined student success and they have several
components of it and I think it would track pretty well with an
accrediting process as well.

But wouldn’t we be more concerned that the
institutions are developing the capacity to measure student learning
and track student success and then bring us their -- I mean we can
give them whatever we can to say, you know our institutions are
different can you compliment the data that we had before us with
data from your institutions, give us evidence.

That’s what we are looking for some evidence that
students are learning and they are completing and it is a good
public investment. It gives us public confidence in this. I think we
are coming a long way there are a lot of private organizations that
are doing this now too and a lot of states.

I know at community college level and 4 year
university level are combined -- or using their own internal
capacity plus engaging some of these organizations I think a
couple of them, to really give you kind of the data you need.

But I am guessing this is the narrative that if we
could identify the decisions that we care most about and then what
kind of data would it take to answer the questions around those
decisions that would help focus everything.

And I think our primary interest is -- are students learning? Are we getting the outcomes? If we have a state or a region with really low educational attainment rates -- that probably needs to be where the spotlight is so it seems like we could start focusing if we had data of that nature.

MR. KEISER: Simon?

MR. BOEHME: Well thank you so much for joining us and I agree with my colleague Frank that you should come to every meeting and we should engage in this conversation. I for one rely on the dashboard. I think it is a vital component of NACIQI because of the lack of transparency in accreditation it is important for students to have as much information when making a -- one of the largest financial investments that they will ever make.

And yes I think the data has a lot of imperfections and I think the feedback from the colleagues from today’s conversation should be helpful. But one thing that I would really like to echo is also what Frank said, the common denominator is vitally important. I think that would make this dashboard stronger and so I would really look to that in the second iteration.

Another piece of feedback is that I would like to see a highlight -- and I’m not sure how this would be incorporated
within the dashboard but particularly low-performing institutions that receive accreditation, how those institutions may be highlighted within the data.

I think one of the greatest and unfortunate situations that a student that pays thousands and thousands of dollars to an institution and they do not receive a credential that there is not the support required for that, these are the kinds of issues that moving forward we have to start talking about.

And I think data can help us to tell that story so I would like to see more information on low-performing institutions with particular accreditors for national and regional.

MR. KEISER: Jennifer and then Kathleen then we are going to go to a discussion and Bobbie.

MS. HONG: I just wanted to remind us that this Committee requested these dashboards because previously if you recall we had members asking questions of accrediting agencies based on external information and external data sources.

So it was hard for us to have a conversation without a common set of information. So this Committee identified these 5 metrics that they felt was deemed important in terms of looking at indicators of the relative performance of accrediting agencies.

So the Department went back and it was a happy lift
based on the existing data that we had, that we collected and we
have produced these dashboards. And yes there are limitations to
these data, we have tried to be very transparent about those
limitations and we have published that accordingly.

I think these conversations are helpful because you
know, there are still a lot of questions as to the data sources and
you know, what the universe is and it is what it is. That being said
you know, we are not -- the way we want to use these dashboard is
another piece of information.

You know we have a staff analysis, we have the
testimony of the agency, we have the iteration back and forth and
we have the data. Obviously we have 18 minds sitting around the
table that have experience in higher education so we are going to
use those data. We are not going to compare apples with oranges.

We want to look at the universe of the institutions
that the agencies accredit and where there is relative -- where there
is a comparison that is valuable among accrediting agencies that
accredit similar institutions this is you know, another piece of
information.

So I just want to remind the Committee why we are
here and it is a second iteration. We just rolled these dashboards
out and so it is -- we are trying to get feedback on how we can
improve it but the data sources that we have are the data sources
that we have, thank you.

MR. KEISER: Kathleen, Bobbie and Federico.

MS. SULLIVAN ALIOTO: Well I just want to
thank you for trying to get this right. And any thoughts that I
might have I hope are considered in a way to assist. But when
Steve was talking about what Walla Walla did I thought to myself
well how about having these practitioners at the table who have
had great success in what they are doing help shape what the
scorecard actually could be in a way that would be helpful and not
draconian once again.

If there are certain kinds of data that can really
assist student achievement shouldn’t those be the kinds of things
that we are looking at and helping institutions to take a closer look
at their own work. Is it possible to do that?

You have these groups here could really help out
one.

MR. KEISER: Bobbie?

MS. DERLIN: I think that’s a really interesting
point Kathleen and I want to really think about that but I have
some other things so that’s a cool point.

MS. SULLIVAN ALIOTO: Thank you.
MS. DERLIN: I wanted to mention a couple of things and one of the things that I was going to point out is a point Jennifer has made which is we used to have like “nada” and I think this is particularly important for people who are new to the Committee.

We have had these for a few times and the data are what they are in terms of the systems that we have got to use right now. But challenging your point Kathleen is how we assure consistency and verifiable data in the broader picture. I mean these limited data are at least we have assurance they are consistently reported. And so that’s why we focused on these so far but that doesn’t mean we can’t do other things.

So I too want to say thanks for being here Oliver and I think whether it is you or someone else who dives deeper into the data elements I think it is good for us to have a part of our session at every meeting to think through some of these issues. I like the idea of including a measure that -- this goes to Claude’s earlier point about putting some context around what we see here. This idea you raised about a proportion that would reflect the students who aren’t included in this report so that we know this represents 30% of the agency’s places in student’s
I’m wondering if I like the idea of being able to have some kind of focus on low-performing institutions, the number of low performing, the challenge we have had in our past discussions is there is no agreement about what’s low-performing. And we now have had Barbara Brittingham come and speak with us who presented a standard of 15% for community colleges and 25% for 4 year institutions. My impression is that if we went around the room we would have a lot of different impressions about whether those are the right numbers. But they are numbers and they are numbers that have never been expressed to us before and so we could use something like that where on the sheet it could say “x” number of institutions are below 15% graduation rate or whatever. And I think that might be interesting to look at. I also would like us to consider conversation in the future whether we could come up with some sort of strategy -- and it wouldn’t necessarily have to be a staff strategy Herman and Jennifer just so you know. It might be something we could do as a subset of members where if we identify the accreditors that will be coming up at the next meeting we could perhaps do some work between
say this meeting and the next meeting where we might focus on some of this additional information that would help put this in context. Like if we have taken -- we’ve referenced ACCJC a number of times.

If I knew how the numbers that are on the scorecard for ACCJC were in reference to another relevant subset group that would really help me form a context as a reader. Now I don’t know quite what that would be. I’m not proposing we do that for our next meeting but I think if we thought about how we might develop such a strategy that could be very helpful, thank you.

MR. KEISER: Federico did you ask me something, someone asked me something.

MR. ZARAGOZA: I just wanted to kind of go back to Jennifer’s point about the data that we have and how we arrived at where we are and I want to make sure that my comments aren’t interpreted to mean that I am not happy with the product, in fact I am.

The point I am making I mean the complexity of the issues that we are dealing with require that we continue the dialogue and obviously I think the variables are the right ones, the indicators are the right ones.

How they are applied in the accreditation context is
really important and I think it is a conversation that we continue to have. But I wanted to get to reaffirm that I really commend the work of staff and the work of this Committee in coming up with these profiles.

MR. KEISER: Yeah I would like to echo the same. I think the data is helpful however it is dangerous in some ways, especially with a comprehensive regional accreditor that has various subsets of institutions and my suggestion would be if you could ladder the reports of the schools at level 1 which would be certificates, level 2 which would be Association, level 3 which would be Baccalaureate and then post-Baccalaureate so that we can compare comparable type data.

A good example is ACCJC has very few Baccalaureate programs. They certainly don’t have any leaked institutions. Berkeley is not in there, Stanford is not in there and the data of Stanford if you compared Stanford’s data with any of the institutions at ACCJC you’d have completely different numbers.

And that is not fair to the community college as it is not fair to Stanford if you are trying to make comparisons. So it is going to be difficult for us to do that but I think -- again echoing both Bobbie’s and Federico’s comments’ the data is important.
If I can take us to the question from a group do we want to continue with the data? Is there anyone who doesn’t want that who doesn’t feel it is useful? Okay so I think you have your answer there.

I’m not sure I understood what number 4 was because most institutions only have one institutional accreditor even though I have 25 programmatic accreditors, I only have one institutional. I think whoever the OP ID number is tied to the institutional accreditor will be the one institution.

MR. SCHAK: Yeah it’s a little bit of a complicated question that I can sort of walk through it if folks are interested in that one.

MR. KEISER: Are there schools that have multiple institutional accreditors?

MR. SCHAK: Yeah so I’ll just use an example. So actually the Ultimate Medical Academy which came up a few days ago -- so what actually happened with them is they had when we produced the June dashboards, they had two institutional accreditors.

They had ACICS and they had ABHES.

MR. KEISER: But they are separate OP ID numbers?
MR. SCHAK: No for the same OP six digit OP ID number.

MS. HONG: But they declare one to federal student aid as their gatekeeper.

MR. KEISER: They may have changed it because of the decision we took at the last meeting.

MR. SCHAK: Exactly so the question number 4 is basically what we do is we key in on what they designate as their primary institutional accreditor. So what happened with that institution is they were under ACICS then they switched. And the question is does the Committee support sort of that data approach to the dashboard.

MR. KEISER: The question 5 -- why would you want to have 90-10 when it would be only applicable to such a few number of schools? I mean if the question is what the purpose of 90-10 was to determine how much money the student pays for themselves into the process then would you use state money which used that number like in Florida the state universities are well over 90% if you take federal and state money into their budget equation. So I don’t see why you would want to pull that data?

MR. BOEHME: To me again -- I think you should
put as much data as you can so long as you qualify and you be very specific because to me something that is frustrating as a NACIQI member is you know, someone -- you know I’ll be reading off this really nice dashboard information and the accreditor will say to me, “Well is it applicable?”

This goes back again to the common denominator question. We need greater clarification about where this data is coming from. You know more data is better.

MR. KEISER: Any final thoughts? Yes Claude?

MR. PRESSNELL: More good data is better.

MR. KEISER: That’s the point, purposeful.

MR. BOEHME: Yeah but I think within -- as long as you qualify it because good has different definitions and frankly I don’t mean to as a friend of NACIQI you know not everyone uses this dashboard information.

I tend to use it a lot and I could use more information. I agree with my colleague that it should be good but there are different ways of assessing what is good.

MR. KEISER: But the reason I said that with 90-10 if let’s say SACHS or even Middle States for you Brian, there are only 12 or 13 for-profit institutions that that data is being measured so it has a very finite purpose and that’s a specific type of
institution and it would not necessarily be for our -- if you only
have 12 out of 800 institutions that have that so they have a 90/10
saying 87% what’s the data mean?

It becomes kind of useless. I’m sorry I’m losing my
voice. Okay Bobbie?

MS. DERLIN: I just want to toss in one other
possibility about these additional measures question. Because one
of the things we could do when we initially pushed to have this
information available to us and I think we all have found it useful
within certain qualifications, we saw it as kind of a for everybody.

One of the things we could do is in the question --
in answering the question of what other additional information
might be useful is take a look at that information. Not necessarily
for the whole ball of wax, but just for some and see does this
inform us in some meaningful way.

So we could examine some of those questions a bit
further for some of the accreditors and then maybe make a
recommendation as yeah this is interesting, it is useful to us and
then do it for everybody. I don’t know if that is a useful remark or
not but I’m done.

MR. BOEHME: I like it.

MR. KEISER: Yes sir?
MR. VAN AUSDLE: Well I wanted to support what you said earlier I think as maybe an initial step that is manageable and would make sense. If you look at the institutions we will be discussing next time we have got the components that we want to focus on.

If we gave them a copy of the scorecard and by the way thanks for all the work on that, I think this is something we haven’t had in higher ED before -- it’s good. But give them a copy of what we have and say this is what we have on your institutions or your agency, would you like to supplement this to give us better information.

I don’t know how doable that would be through the process we use but that would limit it to just the institutions we are dealing with. It would be part of the Pilot. It doesn’t say we are ever going to do it again but it would enlighten us in what the institutions could bring in to answer the questions that are before us as well.

MR. KEISER: Bobbie?

MS. DERLIN: I’m just smiling because you used a good word that we all like, Pilot.

MR. KEISER: Claude?

MR. PRESSNELL: A couple of -- let me ask you
this, is it possible -- because you know, first of all I think they are
useful, you know. I mean obviously I have criticisms of it but I
think it is useful. Is it possible for us to know -- like I mean I think
we should have been far more transparent if you will that we were
only talking about 8 or so recipients, we are only talking about
first-time full-time cohorts in certain areas, make that very, very
clear on here.

But also is it possible for us to know of them if that
is true then what percentage of the total population do we really
look at here? Is that possible to know that?

MR. SCHAK: So that second piece of it might be
fairly difficult because of limitations we have.

MR. PRESSNELL: You see though why I am
saying that?

MR. SCHAK: Yeah.

MR. PRESSNELL: Because I mean if in some
instances it is 80% of the population, that’s pretty reliable. But if it
comes down to 40% of the population that’s not so reliable for us
to make some conclusions on so I leave that out there.

The other one is the financial responsibility
composite score I would argue against it simply because in the
community it has been widely accepted as being erroneous.
The Department knows that there are problems with that score. They have received comments as to why those scores are incorrect and they can take corrective measures but there hasn’t been a huge willingness to do so at this point in time.

And not only that but it doesn’t, you know public institutions are exempt from the score completely. The for-profit community has a totally different type of score that they go after so this is really a non-profit situation that it is not overly reflective of financial stability in my opinion.

And I know I represent the independent colleges but there have been numerous examples, after example, after example of how it doesn’t play out right. I mean even Harvard at one point had a low score as being not financially stable.

So I mean again -- so I would say let’s give the Department an opportunity and the new administration possibly, fix it according to current accounting practices and that’s all of the requests that we have had. But I would be very cautious about throwing that up there.

MR. KEISER: Okay I think we have come to -- the conversation is starting to dwindle. Any final recommendations?

Oh Bobbie you are really excited this week.

MS. DERLIN: I had such a good walk this morning
it just got my juices flowing. I would actually like to make a
Motion. I would like to make a Motion that we invite someone
from the analysis unit to join each NACIQI meeting.

MR. KEISER: There’s a Motion is there a second?

MR. WU: I’ll second.

MR. KEISER: Mr. Wu seconded. Is there any
further discussion? You seem to be very popular -- all in favor of
the Motion signify by raising your hand, anybody opposed? Thank
you Bobbie another positive recommendation that’s great.

Arthur you have been quiet today?

MR. ROTHKOPF: Yeah I just to go back to a point
that Frank made earlier in which we as a Committee at least in our
previous iterations of what we wanted in the way of policy, that we
-- I think we came very close to favoring a unit record system and I
know it’s a controversial subject among independents and others.

But I think at least in my judgment it has always
been I think a good idea because we -- it tends to deal with some of
these issues that we are you know, this isn’t really a good system,
that’s not a good system.

So I guess I would like to come back to the question
about where NACIQI stands if we were asked do we favor a unit
record system, say the Health Committee and the Senate started
looking at it and I know they have had, you know, the subject really hasn’t come up seriously in several years and different people I think may have changed their views. I happen to favor it but I think it’s a question that I guess I would be interested in what the views are of those members that are here now probably close to a quorum. 

MR. KEISER: We have a quorum.

MR. ROTHKOPF: We still have a quorum. Anyway, that’s my point the unit of record.

MR. KEISER: Again that’s a politically sensitive -- beyond our ability to alter the -- it’s beyond our pay grade to alter the --

MR. WU: May I ask the Chair could we take it up at some point when we talk about policy because since NACIQI was reconstituted in ’09 we have had at least two efforts to develop white papers about the Higher Ed Act renewal.

And I am not saying that that means we would come out in favor or against but could we agree at some point in the future to discuss this issue with a full group and more generally to discuss should we do another white paper? They actually have been read and some things have been followed up on so it is not a waste of our time to do that.
MR. KEISER: I’m predisposed to either talk about that at our June meeting. Maybe you could find somebody who is an expert in that area because I certainly am not. I don’t know if anybody in here is at least to understand the pros and cons. Would that be too much to ask?

MS. HONG: About the unit record system, yeah.

MR. KEISER: How about the data integrity process.

MR. BOEHME: I have just a point of information. Is the Chair seeking a Motion relevant to the speaker still in regards to NACIQI’S larger use of the dashboard?

MR. KEISER: I think we all agree that we are going to continue to use it.

MR. BOEHME: Great.

MR. KEISER: And hopefully they will continue to refine it, I think that’s part of the charge yes.

MS. HONG: And just as part of that the consensus is to continue it with the current measures that are currently displayed.

MR. KEISER: Correct or to identify new opportunities where the data is relevant. Kathleen and then Claude?
MS. SULLIVAN ALIOTO: What about the community college piece?

MR. KEISER: What community college piece?

MS. SULLIVAN ALIOTO: Well right now it is 4 year institutions and less than 4 year institutions. How about having 4 year institutions, community colleges and other institutions?

MR. KEISER: I did kind of suggest that we ladder that if we could it would make sense but I don’t know if they can. Again when you have like a North Central where Simon took on a couple of years ago -- a couple of meetings ago, they have a broad membership from community colleges through Doctoral programs. And consequently the lower data of short-term programs is mixed in and blended with the elite institutions that have extraordinarily high data and it skews how we look at the agency.

So I am with you but they have to be able to figure out how to break it out where it would make sense. Claude?

MR. PRESSNELL: Just real quickly as we have the discussion on the unit record level piece we need someone who understands clearly what states are doing because I think that actually we are a lot closer to CERT’s evaluations.
I mean like we participate in the Tennessee longitudinal data system and once there are state reciprocities I think it may be happened through the state operatives in the national abound.

And so I think that there is far more participation than we actually realize. Now what we have to do well even Tennessee is plugging into the student clearinghouse for student mobility purposes, so anyway I just wanted to add that.

MR. KEISER: How many states do you think are actually involved in such as your own? Do you have a sense of that? I’m sorry Clearinghouse’s individual institutions.

MR. PRESSNELL: Well the clearing house in terms of state level longitudinal data systems there has to be a good 15 probably or more.

MR. KEISER: Okay any further -- any issues for the good of the order? Well first of all I want to say thank you for having the trust in electing me your Chair and Frank your Vice Chair. I will do everything I can to keep the meetings going. I’m kind of obsessed with that.

I was going to finish but I was wrong I missed something, Herman you’re up.

MR. BOUNDS: Alright thank you good morning.
Jennifer asked me the other day if I would kind of give an overview of the accreditation groups, the process -- the recognition process from agency submission of petition through the agency appearance here at the NACIQI.

I did add some additional information for the new members so they could kind of be familiar with the accreditation group staff and some of their responsibilities if that is okay? I'll try to get through that quickly.

And if you have any questions just interrupt at any time -- I mean just ask at any time. So staffing -- the accreditation groups consist of 10 folks including the Director. 6 soon to be 5 of the staff members are analysts who oversee and monitor 64 recognized accrediting agencies.

So that’s 5 people to review throughout the year and try to keep track of compliance issues with 64 recognized accrediting agencies. Now that includes state agencies for the approval of vocational education, there are 4 of those -- right guys 4 and 5 state approval agencies for nursing education.

So I will talk about those a little later. And just so you know those two entities do not operate under the rules of 602. They have separate criteria and it is of a much lesser bar. So when they come up for review you just have to remember they are not
under the confines of 602. They follow the 602 process for appearance at the NACIQI but their regulatory criteria is much different, much different, okay.

So again 64 agencies to monitor -- the other things that the staff does is we also review foreign veterinary accrediting agencies. We have approved I think 4 foreign veterinary accrediting agencies.

We also approve Master’s Degrees from military institutions and we are starting to get more of those requests in for that process. Of course the NACIQI is actually the approval authority for those organizations.

And then we also approve or we look at the comparability of foreign countries for foreign medical education and then we report to the National Committee on Foreign Medical Education Accreditation.

And those reviews happen in between NACIQI reviews so the folks over here are quite busy. The other thing that takes up a large majority of staff time is reviewing and investigating complaints that we get in throughout the year.

For instance, if a complaint comes in and if it is for SACHS then that would go to the analyst who was assigned for SACHS so they are split up that way.
So again state agencies -- they are reviewed in accordance with part 603 and believe it or not nurse approval agencies, their criteria was published in the 1969 Federal Registry Notice and is the same criteria -- just so you know it’s old. It is old.

State approval agencies their recognition period for new members is 4 years and of course you all know accrediting agencies there approve their -- excuse me, their recognition periods for 4 years for state approval agencies and then accrediting agencies their recognition period is for 5 years.

The reason you all will see the reduced recognition period is because when an agency is under compliance report like some of the ones yesterday that’s all subtracted from that 5 year review period okay.

Alright so I’ll now start on any questions on staff duties and responsibilities? Good I’m moving, Art is giving me that come on Herman. Yes sir?

MR. ROTHKOPF: I do have a question. Do you have the authority to replace someone who retires?

MR. BOUNDS: So I strategically talked about the staff in case anybody here has any influence over hiring so that you can see the critical shortage that we are going to go through. So if
you know anybody you can help us replace. We have our
replacement in for Steve that’s Dr. Stephanie here -- she’s
replacing Steve but if we have another retirement which I hope is
not Dr. Rachael -- I’m hoping that we can get another replacement
in for her, but I am trying to talk her into staying so she’s a fellow
Tennessee’ian like me so she better stay put.

So the recognition process real quick is the entire
recognition process again is established in regulations 34 CFR 602
through 602.10 through 28 that contains the Secretary’s criteria for
recognition. And actually the process that spells out all the time
lines that is covered in sub-part C and those are in regulations
602.30 through 602.38.

So the only thing that would add to that is what we
do to be in compliance with the recognition process is that we sent
agencies notification of their appearance at the NACIQI one year
in advance of the NACIQI meeting in which they are to appear. So
that answers the question of when we send out the notice we could
give that notice to Jennifer and she could let you all know who is
up basically year out.

Now that does change and it is going to change a lot
this time based on retirements and staffing so we are going to have
to delay some agencies for that. So an example of that is notice is
going out for the December 2017 in December of 2016 and then
that notice informed the agencies that their petitions were due in in
June so that will give the agencies approximately 5 to 6 months to
complete their petitions and then it gives us another 5 to 6 months
to review and then have that information ready to present to the
Committee.

Compliance reports are a different story. They are
due in based on the information in the compliance report.

MR. KEISER: What I want to do is focus on what
do these people do who review agencies.

MR. BOUNDS: Okay we’ll do that I am getting
there now. Okay so when the analysis comes in -- by the way it
takes about 4 to 5 weeks to review one agency under the focus
review criteria and then under the full review, the 95 criteria that’s
applicable to the Title IV gatekeepers, it can take them about 6 to 8
weeks to get through an analysis for one agency.

And basically what that involves is that the petitions
come in, there is always discussion throughout that process
between the analyst and the agency. And the agency must submit,
you know, all the supporting documentation to demonstrate their
compliance with all of the regulatory criteria.

So they painstakingly go through everything. You
know some of that documentation can get upwards of about 8 or 900 pages of stuff that they have to weed through. And they read every manual from start to finish that an agency turns in. So if an agency has an accreditation manual, a policy and procedures manual, a Commission manual -- they don’t just read one or they don’t word search they read the entire thing because you guys will ask questions about something that appears in one manual that may contradict something in another and they want to be prepared to answer those questions.

So it is really in depth. As part of that review they also conduct an on-site review of at least two observations, that’s what we are trying to do and it keeps them on the road quite a bit. So they want to see an accrediting agency’s decision meeting because they want to know how that decision-making body operates.

They want to make sure that body is of the proper composition meaning it has the correct number of public members, the correct number of academics, educators, practitioners, if applicable, so we want to make sure that the bodies contain who they are supposed to be.

When they go out on site reviews they are with that site team all day. They look at the interaction between the site
team, what they are looking at. They really want to make sure that
the site team verifies the documentation as in the institution’s self-
study. So this is a long, long and detailed process.

We also want to see the interaction of the agency
staff. But I will tell you that you know the agency staff is there,
you know, to make sure that the visit goes along correctly. But
just to be clear the staff of an agency they may not be the technical
expertise for the review.

That is in the site team. The site visit team is where
we look to see if the proper -- if the folks are really, really
qualified to review those programs and then we want to make sure
that at those Commission meetings after the site visit that the
Commissioners actually look at the documentation and evaluate
what the site team has reviewed and make decisions.

So that’s really what encompasses that entire
review. At the end of that review the analyst then will start to
complete their report. Some of those reports can get up to 100
pages or more because they determine number 1 -- does the agency
have a policy? Yes.

Do they apply the policy? Yes. And do they
properly evaluate their institutions. So you know that’s kind of
what they do. If there are any issues in the analysis where it is
unclear the entire team reviews that, I review that and then I am always the final determination of whether we find an agency compliant or non-compliant.

So in a nutshell that’s kind of what we do.

MR. KEISER: Questions -- Frank?

MR. WU: So I have a question and I have mixed feelings about this so I welcome your thoughts. How much should NACIQI hear from staff about complaints -- specific complaints that have been filed?

The reason I have mixed feelings is on the one hand I think it is important for us to know and to look at data and information and allegations. On the other hand and the experience that I have and I think my perspective is probably not idiosyncratic, most of the complaints that people want to raise about agencies -- most, not all, but most of them have not been about issues that really fall within our purview.

So I just wonder how much should we learn about that, how much should you brief us on that -- I know it is in there, in the writing if we delve into it and look at it. But I welcome your thoughts.

MR. BOUNDS: Yeah I think the complaints that you know bear on the agency’s recognition I think you all should
see those and we try to get those in the analysis, as you saw the
ones with ACCJC so I think those are important because it is part
of the evaluation process.

You know the other ones I don’t know and I don’t
know how everybody feels about them so say for instance if we get
a complaint in and by the time NACIQI meets for that agency if
that complaint is already 4 years old and we have reviewed it and
if the agency agreed yeah we messed up and here’s what we did to
fix it and it wasn’t catastrophic or it wasn’t something that caused
irreparable harm on a student on their issues and we put that
complaint to bed -- you all will have to tell me if you think that’s
important just for you to go back and it.

If those are some of the issues that we have with
complaints are how far back do you want to go and what do you
think is important for you to hear and see.

MR. WU: So I have a follow-up question. I’m
assuming something just from what we see in written comments of
people who come here because they have a specific issue. I
assume that you get a fair number of individual grievances.

So faculty member, staff member, student, someone
who was kicked out of a program that really -- I feel bad about this
but it is just not something that we can fix because they didn’t
finish their PhD let’s say and they are aggrieved because there is a
time limit or something like that and they didn’t finish within
whatever 8 years or 10 years. It is just not something that we can
do.

So would it be right to assume that you actually get
a significant number of those and you shield us from them?

MR. BOUNDS: We do and we get a lot of
complaints that are not specifically related to the criteria and we
don’t review those at all. And that’s another thing folks have to
understand too when the agencies get complaints they have
complaint policies and procedures that their institutions are aware
of and if it doesn’t meet their bar to review they don’t review
those, they don’t review those either.

And there are a lot of complaints that come in and
you guys well know that an agency removes the accreditation from
an institution of course the institution is going to complain and you
know we look at those. But you know those things come in quite a
bit.

MR. WU: I’m sorry one last question. But
litigation that is brought against agencies I think that rises to a
different level. If someone actually sues and I think you have been
pretty good about flagging those.
MR. BOUNDS: Yeah we do and we do flag them.

MS. NEAL: Well this is an issue of course that I have raised on a number of occasions and I would think in the interest of more data rather than less, an accurate data rather than inaccurate data, that having some sort of compilation that would show us how many complaints and under what section of the criteria they came in under.

And then you could indicate whether they have been resolved or not. Because we have got one agency that has 20 complaints under a particular criteria and I think that that would be valuable to know. So I would urge you to consider that sort of data for us.

And I think in terms of other complaints. I mean the reason this whole issue ever came to this table was that there was a complaint filed against SACHS and ultimately the Secretary of Education did come down with a decision which said that criteria that the accrediting body had adopted over and above those that were set out in the statute could not be reviewed by the Department of Education.

And then when we looked at the -- as I still refer to it WASC Junior this time around there were references in fact to this in the staff report. Notwithstanding this body never received
that resolution of that complaint. And I think it was really
something that we should have received because it goes to the
reviewability of accrediting bodies and their accountability to the
American people so I think that is in fact, the kind of complaint
when it goes up to the highest official in the Department of ED that
we should have been apprised of.

MR. KEISER: Simon -- then we are about ready to
finish, yes?

MR. BOEHME: It’s not relating to complaints.

Herman did you want to --

MR. BOUNDS: I was just going to say yeah I am
not familiar with that complaint but you will notice that when we
do our -- over presentations we do tell you the number and the
resolution of the complaint.

I mean it’s pretty simple for us to tell you what the
issues were and under what section of the criteria. But just to let
you know too we also expect the agencies to follow their published
procedures. So if their published procedures kind of exceed the
criteria we will note that the agency did not follow its published
complaint procedures.

So we do go outside of the criteria because they
have to follow what they are telling the public they are going to do.
MR. KEISER: Simon?

MR. BOEHME: I was just going to make a quick comment and I think I really appreciate us having this presentation and it is very -- what the staff does is commendable and the time that they put into it is tremendous.

And it is so important and I think that we continue with this dashboard because the statutory regulations are so limiting and they often times fail to capture the whole picture of what’s going on in accreditation and that’s why again I urge you when you are creating this dashboard and highlighting for example -- less than 10% graduation rates.

I think that data has to be included in there for every single accreditor because often times the staff as Herman accurately points out, is restricted. They can only do what is in the regulation.

But what is going on in accreditation, what is going on in higher education? The data helps to capture that and it is so vital when we meet here in NACIQI that we have as much information as possible.

MR. KEISER: Well that seems to be a good way to finish. It’s right after 10. Any other issues for the Committee?

Sensing none I will entertain a Motion to adjourn, moved by
Arthur Rothkopf, thank you very, very, very much. We are adjourned.

(Whereupon, at 10:30 a.m., the National Advisory Committee on Institutional Quality and Integrity (NACIQI) was concluded.)