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U.S. DEPARTMENT OF

EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON  
INSTITUTIONAL QUALITY AND INTEGRITY  
(NACIQI)

FEBRUARY 24, 2017

8:30 a.m.

HILTON ALEXANDRIA OLD TOWN HOTEL

GRAND BALLROOM

1767 King Street

Alexandria, VA 22314

1 **Members present**

2 Dr. Kathleen Sullivan Alioto, Strategic Advisor, Fundraiser, and

3 Consultant

4 Mr. Simon Boehme-Student Member, Independent Consultant, San

5 Francisco, California

6 Dr. Jill Derby, Senior Consultant, Association of Governing

7 Boards of Universities and Colleges

8 Dr. Roberta (Bobbie) Derlin, Associate Provost Emeritus, New

9 Mexico State University

10 Dr. Brian W. Jones, President, Strayer University

11 Dr. Arthur E. Keiser, Chancellor and C.E.O., Keiser University

12 Ms. Anne D. Neal, Senior Fellow, American Council of Trustees

13 and Alumni

14 Mr. Arthur J. Rothkopf, President Emeritus, Lafayette College

15 Dr. Steven Van Ausdle, President Emeritus, Walla Walla

16 Community College

17 Mr. Frank H. Wu, Distinguished Professor, University of

18 California Hastings College of Law

19 Dr. Federico Zaragoza, Vice Chancellor for Economic and

20 Workforce Development, Alamo Colleges

21 Claude Presnell, Tennessee Independent Colleges and Universities

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

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

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

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

18 So this morning we are just going to continue our  
19 discussion on the Pilot project so the accreditor dashboard on the  
20 metric site you all identified as wanting to see on the dashboards  
21 was wrapped up into the Pilot project so we will need a Motion  
22 before we leave here today as to you know, any amendments that

1 you want to see to the dashboard. Any kind of improvements  
2 going forward as well as whether we want to also continue using  
3 the metrics that we have identified on the dashboard going forward  
4 during our review of accrediting agencies.

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

9 If you scroll down all the presentations that you  
10 have seen at this meeting should be posted there. I don't know that  
11 we are going to resolve this any time soon so you know if you have  
12 access to the internet again archive meetings under HTTPS and the  
13 site is [ed.gov/NACIQIarchiveofmeetingsfebruary](https://ed.gov/NACIQIarchiveofmeetingsfebruary) and this is the  
14 accreditor dashboard presentation.

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

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

22 So I'm Oliver Schak. I work for the Office of

1 Planning Evaluation and Policy Development Policy and Program  
2 Study Service. And I have been working for the last 3 ½ years on  
3 various data initiatives and one of them is the accreditor  
4 dashboards.

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

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

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

21 I think another difficulty is that each individual  
22 accreditor can really have its own sort of unique characteristics.

1 ACCJC is a good example of that. You have sort of the specific  
2 structure where they focus on 2 year institutions. They also really  
3 have California as a focal point, you know, having one state like  
4 that also is evident.

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

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

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

20                   We did sort of enhance both the data file and the  
21 dashboards with a few additional data points. Probably the most  
22 substantive change we made was that although we continued to

1 include both repayment rate and CD cohort default rate in the data  
2 file on the accreditor graphical dashboards we switched cohort  
3 default rate into there -- into those dashboards instead of  
4 repayment rate.

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

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

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

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

22                   MR. SCHAK: That's a good question -- so there

1 are a number of sources that we draw from. The main source is the  
2 college scorecard and then the college scorecard is actually  
3 drawing from IPED's so graduation rate measures, enrollment,  
4 measures like that are coming from IPED's.

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

9 HCM2 is also actually from federal student aid.  
10 One other measure we look at is earnings and I should note that  
11 those actually -- the cohort comes from federal student aid and  
12 their data systems but the earnings data themselves come from  
13 Treasury and IRS. So that is sort of a high level of review sources  
14 that we are drawing from.

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

20 MR. SCHAK: Right it can be a real limitation for  
21 some accreditors that focus on sort of the less than 4 year  
22 institutions. It's one of the reason we provide that breakdown of

1 the institutions by 4 year and above versus below and also by  
2 control. So ACCJC -- I actually looked at the data file and the  
3 majority of their students are not first-time full-time.

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

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

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

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

22 MR. KEISER: So if a student does not declare a

1 major then they are not counted?

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

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

9 Am I missing -- is there something there that I don't  
10 understand?

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

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

19 But clearly nationally 62% of the students in  
20 community colleges are part-time so they are not in your database.  
21 About 20% of those students are not seeking a Bachelor's Degree  
22 and they are applied science major so that wouldn't be in the data.

1                   The other major mention to kind of the data is that  
2 for community colleges a vast majority of students that come in  
3 that are degree seeking pursuing the Bachelors' are not college  
4 ready so they go into remediation mode and obviously you know,  
5 they are not differentiated from what would be a traditional college  
6 ready student.

7                   So I think the discussion speaks to the need to look  
8 at some of the community colleges and really try to come up with  
9 systems that are much more accurate in kind of projecting what's  
10 happening to students.

11                  Another mention to all of this too is that using UI  
12 database for wages -- you said it was treasury and --

13                  MR. SCHAK: IRS.

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

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

22                  MR. ZARAGOZA: So we are getting a snapshot

1 and often times, especially a lot of our workforce students move  
2 very quickly up through a progression and so wages sometimes  
3 and I think you heard that earlier with looking at entry level versus  
4 middle skill kind of individual there's clearly a difference in the  
5 labor market experience.

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

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

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

16                   MR. ZARAGOZA: Yes.

17                   MR. KEISER: Claude and then Brian.

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

21                   MR. SCHAK: So actually we have used different --  
22 so there are two variables in the data file. One is percentage of

1 students earning greater than \$25,000 and that is sort of a shorter  
2 term measure that is 6 years after. There's another measure that is  
3 median earnings 10 years after and that's actually what's in the  
4 sort of graphical display.

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

8 MR. SCHAK: That is correct.

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

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

18 I think it provides us some general context but it is  
19 not conclusive enough that we should make decisions around this  
20 data pertaining to agencies or institutions. Because I just think that  
21 until we can get it figured out I have got an issue with just putting  
22 data out there just because we can do it even though it may not be

1 reflective of actually what's happening in life.

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

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

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

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

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

22                   So I'm trying to figure out the value of what we get

1 from that when we can't differentiate from institutional type within  
2 these regional accrediting bodies. So it just really makes it I think  
3 -- well put it this way again I think it gives us a very broad context  
4 that is not bad -- I think that's helpful.

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

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

14                   MR. KEISER: Brian?

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

19                   You know I lead a 4 year Degree granting  
20 institution where less than 2% of our students are first-time full-  
21 time. And so I agree with Claude and with Federico that -- and Art  
22 who have made the point that you know, I do think that this data is

1 not terribly useful and I would argue misleading at some level.

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

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

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

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

20                   Or, at a minimum why in the context of the  
21 scorecard why at a minimum there wouldn't be some notation for  
22 each institution around its grad rate at least at what percentage of

1 the students actually are full-time -- first-time full-time. I just  
2 don't understand why some fix hasn't occurred to date.

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

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

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

17 But we could basically in short there is a possibility  
18 of having a graduation rate that includes all students, not just first-  
19 time full-time. A few years down the road we will have some  
20 possibility of looking specifically at PELL students and we would  
21 also have an ability to look at how many students are transferring  
22 within a cohort?

1                   What we would not have is whether they transfer  
2 and they complete but we would have transfer. And the final thing  
3 I would note about sort of a component to IPED's is working on is  
4 I believe it's the case that they measure 6 years out and 8 years out  
5 for all institutions and that's very different from the traditional  
6 graduation rate measure which is sort of 150% normal time.

7                   MR. KEISER: I think -- Kathleen?

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

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

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

20                   MR. KEISER: Claude?

21                   MR. PRESSNELL: Can I ask again -- just where  
22 do you get the student identifiers for the -- to get the salary

1 information? I mean how do you get them in order to identify  
2 what student goes to what institution to say how many -- you know  
3 where these salary ranges come from?

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

6 MR. PRESSNELL: These are only aid recipients?

7 MR. SCHAK: That is correct.

8 MR. PRESSNELL: So not non-aid recipients?

9 MR. SCHAK: Yep.

10 MR. PRESSNELL: Ah.

11 MR. KEISER: That's the same thing with gainful  
12 employment.

13 MR. PRESSNELL: Yeah but also -- then let me  
14 ask you this -- since you have aid recipients back since the  
15 beginning of time why are we so limited to looking at such a short  
16 period of income time? Why can't we go back further?

17 And, I mean you have those identifiers back  
18 decades ago, identify them assuming with institutions because that  
19 is who we distributed the aid to -- why can't we go back and look  
20 at 30 years out, get some mid-career and then late career.

21 I think you are going to see a very, very different  
22 thing. The only reason I say that is that you know I got my

1 undergraduate degree in religious studies. I got my Master's in  
2 Greek and I was living in poverty I'm sure for 3 or 4 years after  
3 that. I would be dragging my institution in the ditch on this but  
4 you know I think I've done okay with my life and I'm doing pretty  
5 well now but this would not -- alright it's debatable, got you -- it's  
6 debatable.

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

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

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

19                   MR. SCHAK: So that is sort of a question where as  
20 I said before I don't work for federal student aid. And a lot of that  
21 I think has to do with sort of operational limitations in their  
22 systems.

1 I would say that I think college scorecard when it  
2 released the earnings data it tried to do kind of as much as it  
3 possibly could. But we could definitely take back that feedback  
4 and see if it is at all possible to go sort of even further after  
5 enrollment so to speak.

6 MR. KEISER: Frank, Steven, Frank first.

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

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

19 You pointed out you had a choice between two  
20 different measures that correlated highly and you picked the one  
21 that made more sense, that's great. If you look at something and  
22 you think this is misleading or there's a better measure I hope staff

1 will tell us about that. Great, okay so that's the first point.

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

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

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

18 Just as a matter of science. So this isn't -- and  
19 math, this isn't a comment that is pro one side or the other side it is  
20 just that the data should show if it is a percentage of what. So  
21 there's a simple fix to that which is every time you show a  
22 proportion just specify the denominator is whatever it is.

1                   Whether it is all students, all FITIACS, FITIACS in  
2 financial aid, first-time, it's FITIAC is that how it is spelled? Yeah  
3 First Time in Any College.

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

5                   MR. WU: That comes from IPED's right?

6                   MR. SCHAK: Um-hmm.

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

8                   MR. KEISER: I didn't think that was possible.

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

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

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

20                   Which if you don't follow this -- it's a really  
21 interesting issue it does not break down liberal, conservative lines.  
22 So for example the ACLU is against student unit records on the

1 grounds of what they could be used for. And for those of you who  
2 don't follow this -- that's the idea of having a single federal  
3 government identifier for every higher education student to track  
4 them.

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

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

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

18                   MR. KEISER: Steven?

19                   MR. VAN AUSDLE: Well thank you Mr. Chair. I  
20 was thinking back to the first presentation we had and I think it  
21 was the regional accreditors talking about having an update on  
22 what's going on, state of the art and data collection and they talked

1 about going to other databases that we have to measure student  
2 outcomes. And the trend that I have seen, especially I think at the  
3 institutional level is for much more accountability.

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

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

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

18 And amazing our experience was primarily through  
19 the Aspen Institute where they came in and spent a lot of money  
20 following our students and verifying. And it was a little bit  
21 limited, IPED's was a bit limited but ENCHAMS the others, really  
22 enhanced that data.

1                   That organization might be worth a call because  
2 they have defined student success and they have several  
3 components of it and I think it would track pretty well with an  
4 accrediting process as well.

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

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

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

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

1 decisions that would help focus everything.

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

7                   MR. KEISER: Simon?

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

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

21                   Another piece of feedback is that I would like to see  
22 a highlight -- and I'm not sure how this would be incorporated

1 within the dashboard but particularly low-performing institutions  
2 that receive accreditation, how those institutions may be  
3 highlighted within the data.

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

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

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

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

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

22 So the Department went back and it was a happy lift

1 based on the existing data that we had, that we collected and we  
2 have produced these dashboards. And yes there are limitations to  
3 these data, we have tried to be very transparent about those  
4 limitations and we have published that accordingly.

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

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

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

20 So I just want to remind the Committee why we are  
21 here and it is a second iteration. We just rolled these dashboards  
22 out and so it is -- we are trying to get feedback on how we can

1 improve it but the data sources that we have are the data sources  
2 that we have, thank you.

3 MR. KEISER: Kathleen, Bobbie and Federico.

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

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

16 You have these groups here could really help out  
17 one.

18 MR. KEISER: Bobbie?

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

22 MS. SULLIVAN AILOTO: Thank you.

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

6 We have had these for a few times and the data are  
7 what they are in terms of the systems that we have got to use right  
8 now. But challenging your point Kathleen is how we assure  
9 consistency and verifiable data in the broader picture.

10 I mean these limited data are at least we have  
11 assurance they are consistently reported. And so that’s why we  
12 focused on these so far but that doesn’t mean we can’t do other  
13 things.

14 So I too want to say thanks for being here Oliver  
15 and I think whether it is you or someone else who dives deeper  
16 into the data elements I think it is good for us to have a part of our  
17 session at every meeting to think through some of these issues.

18 I like the idea of including a measure that -- this  
19 goes to Claude’s earlier point about putting some context around  
20 what we see here. This idea you raised about a proportion that  
21 would reflect the students who aren’t included in this report so that  
22 we know this represents 30% of the agency’s places in student’s

1 who are not.

2 I'm wondering if I like the idea of being able to  
3 have some kind of focus on low-performing institutions, the  
4 number of low performing, the challenge we have had in our past  
5 discussions is there is no agreement about what's low-performing.

6 And we now have had Barbara Brittingham come  
7 and speak with us who presented a standard of 15% for community  
8 colleges and 25% for 4 year institutions. My impression is that if  
9 we went around the room we would have a lot of different  
10 impressions about whether those are the right numbers.

11 But they are numbers and they are numbers that  
12 have never been expressed to us before and so we could use  
13 something like that where on the sheet it could say "x" number of  
14 institutions are below 15% graduation rate or whatever.

15 And I think that might be interesting to look at. I  
16 also would like us to consider conversation in the future whether  
17 we could come up with some sort of strategy -- and it wouldn't  
18 necessarily have to be a staff strategy Herman and Jennifer just so  
19 you know.

20 It might be something we could do as a subset of  
21 members where if we identify the accreditors that will be coming  
22 up at the next meeting we could perhaps do some work between

1 say this meeting and the next meeting where we might focus on  
2 some of this additional information that would help put this in  
3 context. Like if we have taken -- we've referenced ACCJC a  
4 number of times.

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

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

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

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

22                   How they are applied in the accreditation context is

1 really important and I think it is a conversation that we continue to  
2 have. But I wanted to get to reaffirm that I really commend the  
3 work of staff and the work of this Committee in coming up with  
4 these profiles.

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

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

19 And that is not fair to the community college as it is  
20 not fair to Stanford if you are trying to make comparisons. So it is  
21 going to be difficult for us to do that but I think -- again echoing  
22 both Bobbie's and Federico's comments' the data is important.

1                   If I can take us to the question from a group do we  
2 want to continue with the data? Is there anyone who doesn't want  
3 that who doesn't feel it is useful? Okay so I think you have your  
4 answer there.

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

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

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

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

20                  They had ACICS and they had ABHES.

21                  MR. KEISER: But they are separate OP ID  
22 numbers?

1 MR. SCHAK: No for the same OP six digit OP ID  
2 number.

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

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

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

13 MR. KEISER: The question 5 -- why would you  
14 want to have 90-10 when it would be only applicable to such a few  
15 number of schools? I mean if the question is what the purpose of  
16 90-10 was to determine how much money the student pays for  
17 themselves into the process then would you use state money which  
18 used that number like in Florida the state universities are well over  
19 90% if you take federal and state money into their budget equation.

20 So I don't see why you would want to pull that  
21 data?

22 MR. BOEHME: To me again -- I think you should

1 put as much data as you can so long as you qualify and you be very  
2 specific because to me something that is frustrating as a NACIQI  
3 member is you know, someone -- you know I'll be reading off this  
4 really nice dashboard information and the accreditor will say to  
5 me, "Well is it applicable?"

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

9 MR. KEISER: Any final thoughts? Yes Claude?

10 MR. PRESSNELL: More good data is better.

11 MR. KEISER: That's the point, purposeful.

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

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

19 MR. KEISER: But the reason I said that with 90-10  
20 if let's say SACHS or even Middle States for you Brian, there are  
21 only 12 or 13 for-profit institutions that that data is being measured  
22 so it has a very finite purpose and that's a specific type of

1 institution and it would not necessarily be for our -- if you only  
2 have 12 out of 800 institutions that have that so they have a 90/10  
3 saying 87% what's the data mean?

4 It becomes kind of useless. I'm sorry I'm losing my  
5 voice. Okay Bobbie?

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

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

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

21 MR. BOEHME: I like it.

22 MR. KEISER: Yes sir?

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

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

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

18                   MR. KEISER: Bobbie?

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

21                   MR. KEISER: Claude?

22                   MR. PRESSNELL: A couple of -- let me ask you

1 this, is it possible -- because you know, first of all I think they are  
2 useful, you know. I mean obviously I have criticisms of it but I  
3 think it is useful. Is it possible for us to know -- like I mean I think  
4 we should have been far more transparent if you will that we were  
5 only talking about 8 or so recipients, we are only talking about  
6 first-time full-time cohorts in certain areas, make that very, very  
7 clear on here.

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

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

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

15                   MR. SCHAK: Yeah.

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

20                   The other one is the financial responsibility  
21 composite score I would argue against it simply because in the  
22 community it has been widely accepted as being erroneous.

1                   The Department knows that there are problems with  
2 that score. They have received comments as to why those scores  
3 are incorrect and they can take corrective measures but there hasn't  
4 been a huge willingness to do so at this point in time.

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

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

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

19                  MR. KEISER: Okay I think we have come to -- the  
20 conversation is starting to dwindle. Any final recommendations?  
21 Oh Bobbie you are really excited this week.

22                  MS. DERLIN: I had such a good walk this morning

1 it just got my juices flowing. I would actually like to make a  
2 Motion. I would like to make a Motion that we invite someone  
3 from the analysis unit to join each NACIQI meeting.

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

5 MR. WU: I'll second.

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

10 Arthur you have been quiet today?

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

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

20 So I guess I would like to come back to the question  
21 about where NACIQI stands if we were asked do we favor a unit  
22 record system, say the Health Committee and the Senate started

1 looking at it and I know they have had, you know, the subject  
2 really hasn't come up seriously in several years and different  
3 people I think may have changed their views.

4 I happen to favor it but I think it's a question that I  
5 guess I would be interested in what the views are of those members  
6 that are here now probably close to a quorum.

7 MR. KEISER: We have a quorum.

8 MR. ROTHKOPF: We still have a quorum.

9 Anyway, that's my point the unit of record.

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

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

17 And I am not saying that that means we would  
18 come out in favor or against but could we agree at some point in  
19 the future to discuss this issue with a full group and more generally  
20 to discuss should we do another white paper?

21 They actually have been read and some things have  
22 been followed up on so it is not a waste of our time to do that.

1                   MR. KEISER: I'm predisposed to either talk about  
2 that at our June meeting. Maybe you could find somebody who is  
3 an expert in that area because I certainly am not. I don't know if  
4 anybody in here is at least to understand the pros and cons. Would  
5 that be too much to ask?

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

7                   MR. KEISER: How about the data integrity  
8 process.

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

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

14                  MR. BOEHME: Great.

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

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

20                  MR. KEISER: Correct or to identify new  
21 opportunities where the data is relevant. Kathleen and then  
22 Claude?

1 MS. SULLIVAN ALIOTO: What about the  
2 community college piece?

3 MR. KEISER: What community college piece?

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

8 MR. KEISER: I did kind of suggest that we ladder  
9 that if we could it would make sense but I don't know if they can.  
10 Again when you have like a North Central where Simon took on a  
11 couple of years ago -- a couple of meetings ago, they have a broad  
12 membership from community colleges through Doctoral programs.

13 And consequently the lower data of short-term  
14 programs is mixed in and blended with the elite institutions that  
15 have extraordinarily high data and it skews how we look at the  
16 agency.

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

19 MR. PRESSNELL: Just real quickly as we have the  
20 discussion on the unit record level piece we need someone who  
21 understands clearly what states are doing because I think that  
22 actually we are a lot closer to CERT's evaluations.

1 I mean like we participate in the Tennessee  
2 longitudinal data system and once there are state reciprocities I  
3 think it may be happened through the state operatives in the  
4 national abound.

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

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

12 MR. PRESSNELL: Well the clearing house in  
13 terms of state level longitudinal data systems there has to be a good  
14 15 probably or more.

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

20 I was going to finish but I was wrong I missed  
21 something, Herman you're up.

22 MR. BOUNDS: Alright thank you good morning.

1 Jennifer asked me the other day if I would kind of give an  
2 overview of the accreditation groups, the process -- the recognition  
3 process from agency submission of petition through the agency  
4 appearance here at the NACIQI.

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

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

14 So that's 5 people to review throughout the year and  
15 try to keep track of compliance issues with 64 recognized  
16 accrediting agencies. Now that includes state agencies for the  
17 approval of vocational education, there are 4 of those -- right guys  
18 4 and 5 state approval agencies for nursing education.

19 So I will talk about those a little later. And just so  
20 you know those two entities do not operate under the rules of 602.  
21 They have separate criteria and it is of a much lesser bar. So when  
22 they come up for review you just have to remember they are not

1 under the confines of 602. They follow the 602 process for  
2 appearance at the NACIQI but their regulatory criteria is much  
3 different, much different, okay.

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

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

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

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

20 For instance, if a complaint comes in and if it is for  
21 SACHS then that would go to the analyst who was assigned for  
22 SACHS so they are split up that way.

1                   So again state agencies -- they are reviewed in  
2 accordance with part 603 and believe it or not nurse approval  
3 agencies, their criteria was published in the 1969 Federal Registry  
4 Notice and is the same criteria -- just so you know it's old. It is  
5 old.

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

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

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

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

20                   MR. BOUNDS: So I strategically talked about the  
21 staff in case anybody here has any influence over hiring so that you  
22 can see the critical shortage that we are going to go through. So if

1 you know anybody you can help us replace. We have our  
2 replacement in for Steve that's Dr. Stephanie here -- she's  
3 replacing Steve but if we have another retirement which I hope is  
4 not Dr. Rachael -- I'm hoping that we can get another replacement  
5 in for her, but I am trying to talk her into staying so she's a fellow  
6 Tennessee'ian like me so she better stay put.

7                   So the recognition process real quick is the entire  
8 recognition process again is established in regulations 34 CFR 602  
9 through 602.10 through 28 that contains the Secretary's criteria for  
10 recognition. And actually the process that spells out all the time  
11 lines that is covered in sub-part C and those are in regulations  
12 602.30 through 602.38.

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

20                   Now that does change and it is going to change a lot  
21 this time based on retirements and staffing so we are going to have  
22 to delay some agencies for that. So an example of that is notice is

1 going out for the December 2017 in December of 2016 and then  
2 that notice informed the agencies that their petitions were due in in  
3 June so that will give the agencies approximately 5 to 6 months to  
4 complete their petitions and then it gives us another 5 to 6 months  
5 to review and then have that information ready to present to the  
6 Committee.

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

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

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

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

22 So they painstakingly go through everything. You

1 know some of that documentation can get upwards of about 8 or  
2 900 pages of stuff that they have to weed through. And they read  
3 every manual from start to finish that an agency turns in. So if an  
4 agency has an accreditation manual, a policy and procedures  
5 manual, a Commission manual -- they don't just read one or they  
6 don't word search they read the entire thing because you guys will  
7 ask questions about something that appears in one manual that may  
8 contradict something in another and they want to be prepared to  
9 answer those questions.

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

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

21                   When they go out on site reviews they are with that  
22 site team all day. They look at the interaction between the site

1 team, what they are looking at. They really want to make sure that  
2 the site team verifies the documentation as in the institution's self-  
3 study. So this is a long, long and detailed process.

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

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

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

20 Do they apply the policy? Yes. And do they  
21 properly evaluate their institutions. So you know that's kind of  
22 what they do. If there are any issues in the analysis where it is

1 unclear the entire team reviews that, I review that and then I am  
2 always the final determination of whether we find an agency  
3 compliant or non-compliant.

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

5 MR. KEISER: Questions -- Frank?

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

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

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

21 MR. BOUNDS: Yeah I think the complaints that  
22 you know bear on the agency's recognition I think you all should

1 see those and we try to get those in the analysis, as you saw the  
2 ones with ACCJC so I think those are important because it is part  
3 of the evaluation process.

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

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

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

20                   So faculty member, staff member, student, someone  
21 who was kicked out of a program that really -- I feel bad about this  
22 but it is just not something that we can fix because they didn't

1 finish their PhD let's say and they are aggrieved because there is a  
2 time limit or something like that and they didn't finish within  
3 whatever 8 years or 10 years. It is just not something that we can  
4 do.

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

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

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

19 MR. WU: I'm sorry one last question. But  
20 litigation that is brought against agencies I think that rises to a  
21 different level. If someone actually sues and I think you have been  
22 pretty good about flagging those.

1 MR. BOUNDS: Yeah we do and we do flag them.

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

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

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

20 And then when we looked at the -- as I still refer to  
21 it WASC Junior this time around there were references in fact to  
22 this in the staff report. Notwithstanding this body never received

1 that resolution of that complaint. And I think it was really  
2 something that we should have received because it goes to the  
3 reviewability of accrediting bodies and their accountability to the  
4 American people so I think that is in fact, the kind of complaint  
5 when it goes up to the highest official in the Department of ED that  
6 we should have been apprised of.

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

9 MR. BOEHME: It's not relating to complaints.  
10 Herman did you want to --

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

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

21 So we do go outside of the criteria because they  
22 have to follow what they are telling the public they are going to do.

1 MR. KEISER: Simon?

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

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

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

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

20 MR. KEISER: Well that seems to be a good way to  
21 finish. It's right after 10. Any other issues for the Committee?  
22 Sensing none I will entertain a Motion to adjourn, moved by

1 Arthur Rothkopf, thank you very, very, very much. We are  
2 adjourned.

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

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