

## **Report of the Meeting**

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

**June 20-22, 2017**



\_\_\_\_\_/s/\_\_\_\_\_  
Arthur E. Keiser, Ph.D., Chair

**TABLE OF CONTENTS**

**EXECUTIVE SUMMARY.....4**

**UNDER SECRETARY JIM MANNING.....6**

**PANEL ON STUDENT UNIT RECORD DATA SYSTEMS.....6**

**SUMMARY OF AGENCY-RELATED ACTIONS.....6**

**SUMMARY OF FEDERAL DEGREE-GRANTING ACTIONS.....10**

**NACIQI POLICY DISCUSSION.....10**

### **DISCLAIMER**

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its June 20-22, 2017 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008, and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report's recommendations do not purport to represent the views of the Department.

## EXECUTIVE SUMMARY

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

NACIQI met to carry out its responsibilities to advise the senior Department official with respect to the recognition of accrediting agencies at its June 20-22, 2017 meeting at the Washington Plaza Hotel at 10 Thomas Circle, NW, Washington, DC, 20005.

NACIQI reviewed the following types of applications at its June 20-22, 2017 meeting:

- Nine applications for renewal of recognition from accrediting agencies;
- One request for an expansion of scope;
- One request for authorization of a graduate degree offered by a military educational institution; and
- One notification of a redesignation of an existing degree-granting authority by a military educational institution.

NACIQI reviews all information submitted by an agency in support of its petition, the staff analysis and report, and third-party comments. NACIQI posed standard questions to agencies from its [pilot project](#) document and considered data provided by the [accreditor data dashboards](#) as part of its review process.

Under Secretary Jim Manning opened the meeting and welcomed the Committee and members of the public. He thanked NACIQI members for their service and recognized NACIQI's vital role in ensuring high-quality education for students.

NACIQI heard a panel presentation regarding student unit record data systems from representatives of two associations. Panel members included: Patrick Lane, Director of Data Initiatives, Western Interstate Commission for Higher Education (WICHE), and Christina E. Whitfield, Associate Vice President, State Higher Education Executive Officers Association (SHEEO).

Oliver Schak from the Office of Planning, Evaluation, and Policy Development, presented the update of the accreditation dashboards to NACIQI, and NACIQI continued to engage in a policy discussion regarding the use of data.

NACIQI members in attendance for all or part of the meeting included Arthur Keiser (Chair), Frank Wu (Vice Chair), Kathleen Sullivan Alioto, Simon Boehme, Jill Derby, John Etchemendy, George T. French, Brian Jones, Paul LeBlanc, Anne Neal, Richard O'Donnell, Susan Phillips, Claude Pressnell, Arthur Rothkopf, Steven VanAusdle, Ralph Wolff, and Federico Zaragoza. U.S. Department of Education representatives who participated in the meeting included: NACIQI Executive Director and Designated Federal Official Jennifer Hong, Accreditation Director Herman Bounds, Sally Morgan (Office of the General Counsel), Elizabeth Daggett, Nicole Harris, Valerie Lefor, Stephanie McKissic, Charles Mula, and Rachael Shultz.

## **UNDER SECRETARY JIM MANNING**

Under Secretary Jim Manning opened the meeting and welcomed the Committee and members of the public. He thanked NACIQI members for their service and recognized NACIQI's vital role in ensuring high-quality education for students. On behalf of the Secretary, the Under Secretary recognized the collective knowledge and experience of members of NACIQI and encouraged the Committee to continue to strive to provide the best advice possible concerning accreditation matters.

## **PANEL ON STUDENT UNIT RECORD DATA SYSTEMS**

NACIQI heard a panel presentation regarding student unit record data systems from representatives of associations. Panel members included: Patrick Lane, Director of Data Initiatives, Western Interstate Commission for Higher Education (WICHE); Christina E. Whitfield, Associate Vice President, State Higher Education Executive Officers Association (SHEEO).

Panel members shared information regarding their respective programs and observations of student unit record systems. Panel members also shared best practices with respect to the use of postsecondary data, as well as linkages between postsecondary, K-12, and workforce data.

Presentation materials are accessible on the [NACIQI website](#) under "June 20-22, 2017 Meeting." NACIQI members requested more information and future panels to further inform discussion regarding data, and to contemplate a position on a federal student unit record data system.

### Third Party Comments:

Dr. Doug Shapiro, Executive Director | National Student Clearinghouse Research Center  
Bernard Fryshman | Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)  
Jody Feder | National Association of Independent Colleges and Universities (NAICU)

## **SUMMARY OF AGENCY-RELATED ACTIONS**

(\*In alphabetical order.)

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

### **Accreditation Council for Pharmacy Education (ACPE)**

Action for Consideration: Renewal of recognition

NACIQI Recommendation: Vote 9-6

Renew the agency's recognition for five years.

Discussion: NACIQI disagreed with the staff recommendation, and that the staff's finding rose to an area of non-compliance.

NACIQI Primary Readers:

Ralph Wolff

Federico Zaragoza

Representatives of the Agency:

Timothy L. Tucker, PharmD, President | ACPE Board of Directors

Peter H. Vlasses, PharmD, DSc (Hon) FCCP | ACPE Executive Director

J. Gregory Boyer, PhD, Director | Professional Degree Program Accreditation

**American Dental Association, Commission on Dental Accreditation (ADA CODA)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 15-0

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

NACIQI Primary Readers:

John Etchemendy

Arthur J. Rothkopf

Representatives of the Agency:

Harold Mark Livingston, DDS, Chair | CODA, ADA

Sherin Took, EdD, MS, Director | CODA, ADA

Cathryn Albrecht, JD, Senior Associate General Counsel | CODA, ADA

**American Occupational Therapy Association, Accreditation Council for Occupational Therapy Education (AOTA ACOTE)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 14-0

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

NACIQI Primary Readers:

George T. French, Jr.

Steven VanAusdler

Representatives of the Agency:

Heather M. Stagliano, DHSc, OTR/L, Director of Accreditation | AOTA ACOTE

Neil Harvison, PhD, OTR/L, FAOTA, Chief Officer, Academic and Scientific Affairs | AOTA ACOTE

Pamela Roberts, PhD, OTR/L, SCFES, FAOTA, CPHQ, FNAP, FACRM, Director, Physical Medicine, Rehabilitation, Academic & Physician Informatics | Cedars-Sinai Health System

Third Party Comments:

Mary G. Hardy | Former OTA program student in an accredited program

**Association for Biblical Higher Education (ABHE)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 15-0

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

NACIQI Primary Readers:

Brian W. Jones

Susan D. Phillips

Representatives of the Agency:

Ronald C. Kroll, EdD, Director | ABHE

Shane M. Wood, PhD, Associate Director | ABHE  
Lori Jo Stanfield, MA, Chair | ABHE

**Association for Clinical Pastoral Education, Inc. (ACPE)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote 13-0

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

NACIQI Primary Readers:

Simon J. Boehme

Representatives of the Agency:

Marc Medwed, Program Manager | ACPE

Trace Haythorn | Executive Director

Wayne Mayberry | The Chair of the Accreditation Commission

**Commission on Collegiate Nursing Education (CCNE)**

Action for Consideration: Renewal of recognition and expansion of scope

Committee Recommendation: Vote 10-4

The Committee does not support the interpretation made by the staff with respect to authority of CCNE's decision-making body to set the date of effective accreditation at the time of the site visit if the decision-making body determines that at the time of the site visit, the program met the agency's standards. The Committee's reading of 34 CFR 602.3 permits such an interpretation.

Moreover, the Committee finds that the rationale of protecting financial aid does not apply to CCNE since it is not a Title IV gatekeeper and all programs accredited by CCNE are already regionally-accredited.

As a consequence, the Committee acts to grant CCNE continued renewal for five years, including approving its requested expansion of scope to accredit certificates.

Finally, with respect to the documentation of the agency's implementation of a good cause extension following a show cause, the agency is directed to file all necessary documentation within 10 days following this meeting.

Discussion: NACIQI disagreed with the staff recommendation on recognition and the Department's interpretation regarding effective date of accreditation. NACIQI concurred with the staff recommendation to grant the request to expand the agency's scope to include certificate programs.

NACIQI Primary Readers:

Ralph Wolff

Frank H. Wu

Representatives of the Agency:

Susan D. Ruppert, PhD, RN, FNP-C, ANP-BC, FNAP, FCCM, FAANP, FAAN | Chair, Board of Commissioners, CCNE

Jennifer Butlin, EdD | Executive Director, CCNE



Benjamin Murray, MPA | Director of Accreditation Services, CCNE

Third Party Comments:

Dr. Carol Urban | George Mason University

Dr. Jeanne Matthews | Marymount University

Dr. Marie Nolan | Johns Hopkins University

**Distance Education Accrediting Commission (DEAC)**

Action for Consideration: Renewal of recognition

NACIQI Recommendation: Vote 15-0

Renew the agency's recognition for five years.

NACIQI Primary Readers:

Paul J. Le Blanc

Anne D. Neal

Representatives of the Agency:

Leah K. Matthews, PhD, Executive Director | DEAC

David Oxenhandler, Chair | DEAC

Robert Brodnick | Strategic Initiatives

Third Party Comments:

Patrick C. Spada, President | Higher Education Research and Development (H.E.R.D.)

**Middle States Commission on Secondary Schools (MSA CSS)**

Action for Consideration: Renewal of recognition

Recommendation: Vote 14-0 (Recusals: Jones)

Continue the agency's current recognition and require the agency to come into compliance within 6 months, and submit a compliance report 30 days after the 6 month period that demonstrates the agency's compliance with the issues identified in the staff analysis.

NACIQI Primary Readers:

Simon J. Boehme

Jill Derby

Representatives of the Agency:

Craig J. Tice, Ph.D, Superintendent of Schools and Chair of MSA CSS | Fayetteville-Manlius Central School District

Jane W. Pruitt, Ed.D, Accreditation Officer | MSA

Glen R. Mort, Ed.D, Accreditation Officer | MSA

Daniel C. Rufo, MS.Ed, Director of Accreditation | MSA

**Southern Association of Colleges and Schools, Commission on Colleges (SACSCOC)**

Action for Consideration: Renewal of recognition

NACIQI Recommendation: Vote 6-2 (Recusals: French, Keiser, Pressnell, Zaragoza)

Renew the agency's recognition for five years.

Discussion: NACIQI disagreed with the staff recommendation, and that the staff's finding rose to an area of non-compliance.

NACIQI Primary Readers:

Richard F. O'Donnell

Susan D. Phillips

Representatives of the Agency:

Belle S. Wheelan, Ph.D., President | SACSCOC

Dr. Andrew Westmoreland, President | Sanford University

Carol A. Luthman, Director of Legal and Governmental Affairs, and Commission Support | SACSCOC

Donna Barrett, Director of Institutional Finance | SACSCOC

## **SUMMARY OF FEDERAL DEGREE-GRANTING ACTIONS**

### **Air University**

Action for Consideration: Request for authorization of a Master of Science degree in Air Power Strategy and Technology Integration

NACIQI Recommendation: Vote 15-0

Approve the Degree Granting Authority of the New Master of Science in Airpower Strategy and Technology Integration degree.

The Department would like to further recommend that those previously and currently enrolled in the program be eligible to receive degrees for successful completion of the program.

NACIQI Primary Readers:

Paul J. LeBlanc

Claude O. Pressnell, Jr.

Representatives of the Agency:

Anthony Cain, Ph.D. | Air University, Associate Vice President for Academic Affairs

### **U.S. Army Command and General Staff College**

Action for Consideration: Notification of a substantive change (Redesignation of an existing degree-granting authority)

NACIQI Recommendation: Vote 15-0

Accept the report.

NACIQI Primary Readers:

Kathleen Sullivan Alioto

Arthur J. Rothkopf

Representatives of the Agency:

James B. Martin, Ph.D., Dean of Academics | U.S. Army Command and General Staff College

Gerald S. Gorman, Ph.D., Assistant Dean, SAMS | U.S. Army Command and General Staff College

## **NACIQI POLICY DISCUSSION**

Oliver Schak from the Office of Planning, Evaluation, and Policy Development, presented the update of the accreditation dashboards to NACIQI. Presentation materials are accessible on the [NACIQI website](#) under "June 20-22, 2017 Meeting."

NACIQI engaged in a policy discussion regarding data and student unit record systems, bright lines, sub-regulatory directives, NACIQI as the decision-maker, Federal degree authorization process, and making recommendations to the Secretary. Discussion included interest in assembling another panel for the next meeting to learn more about options regarding a Federal student unit record data system.

NACIQI moved to set-up a subcommittee to provide a response to the [Secretary's Request for Comments published in the Federal Register on June 22, 2017](#) regarding the Regulatory Reform Task Force's evaluation of existing regulations and guidance that have a policy impact (Vote: 8-0). Chairman Keiser appointed members Boehme, Alioto, LeBlanc, and Pressnell to the subcommittee.