UNITED STATES OF AMERICA
DEPARTMENT OF EDUCATION
+ + + + +

OFFICE OF POSTSECONDARY EDUCATION
+ + + + +

NATIONAL ADVISORY COMMITTEE ON
INSTITUTIONAL QUALITY AND INTEGRITY
+ + + + +

MEETING
+ + + + +

WEDNESDAY
FEBRUARY 7, 2018
+ + + + +

The Advisory Committee met in the National Ballroom of the Washington Plaza Hotel located at 10 Thomas Circle, Northwest, Washington, D.C., at 8:30 a.m., Arthur Keiser, Chairman, presiding.
MEMBERS PRESENT

ARTHUR KEISER, Chairman
FRANK H. WU, Vice Chair
SIMON BOEHME
ROBERTA DERLIN, PhD
JOHN ETCHEMENDY, PhD
GEORGE FRENCH, PhD
BRIAN W. JONES, PhD
RICK F. O'DONNELL
SUSAN D. PHILLIPS, PhD
CLAUDE O. PRESSNELL, JR., PhD
RALPH WOLFF
STEVEN VAN AUSDLE, PhD
FEDERICO ZARAGOZA, PhD

STAFF PRESENT

JENNIFER HONG, NACIQI Executive Director
HERMAN BOUNDS, Director, Accreditation Group
ELIZABETH DAGGETT, Staff Analyst
NICOLE HARRIS, Staff Analyst
VALERIE LEFAR, Staff Analyst
STEPHANIE McKISSIC, Staff Analyst
SALLY MORGAN, Office of the General Counsel
CHUCK MULA, Staff Analyst
ALSO PRESENT

SHARON BEASLEY, Accreditation Commission for Education in Nursing
BARBARA BRITTINGHAM, New England Association of Schools and Colleges
ANNE COCKERHAM, Accreditation Commission for Midwifery Education
ANTOINETTE FLORES, Center for American Progress
BARBARA GELLMAN-DANLEY, Higher Learning Commission
RONALD HUNT, Accreditation Commission for Midwifery Education
PETER JOHNSON, Accreditation Commission for Midwifery Education
CHERYL JOHNSON-ODIM, Higher Learning Commission
DAWN LINDSLEY, Oklahoma Department of Career and Technology Education
MARCIE MACK, Oklahoma Department of Career and Technology Education
BETH MARCOUX, Commission on Accreditation in Physical Therapy Education
HEATHER MAURER, Accreditation Commission for Midwifery Education
CATHERINE McJANNETT, Accreditation Commission for Education in Nursing
PATRICIA O'BRIEN, New England Association of Schools and Colleges
KAREN PETERSON, Higher Learning Commission
MARSAL P. STOLL, Accreditation Commission for Education in Nursing
SANDRA WISE, Commission on Accreditation in Physical Therapy Education
CONTENTS

Welcome and Introductions ............... 5

Consent Agenda and Procedures .......... 7

Renewal of Recognition - Higher
Learning Commission .................. 10

Renewal of Recognition - New England
Association of Schools and
Colleges, Commission on Institutions
of Higher Education (NEASC) .......... 114

Renewal of Recognition - Accreditation Commission
for Education in Nursing (ACEN) .... 158

Renewal of Recognition - Accreditation Commission
for Midwifery Education (ACME) .... 216

Compliance Report - State Agency for the Approval
of Public Postsecondary Education,
Oklahoma Board of Career and Technology
Education ............................ 237

Renewal of Recognition - American Physical
Therapy Association, Commission on
Accreditation in Physical Therapy
Education (CAPTE) ............... 287

Adjourn ............................ 318
CHAIRMAN KEISER: Well, good morning, everyone. Welcome to the February meeting of the National Advisory Committee on Institutional Quality and Integrity. My name is Art Keiser, and, if I would, I'd like to have the members of the Committee introduce themselves. John, would you start?

MEMBER ETCHEMENDY: John Etchemendy, professor at Stanford, former provost.

MEMBER O'DONNELL: Rick O'Donnell, founder and CEO of Skills Fund.

MEMBER DERLIN: Bobbie Derlin, former associate provost at New Mexico State in Las Cruces.

MEMBER ZARAGOZA: Federico Zaragoza, Vice Chancellor of Economic and Workforce Development for the Alamo Colleges in San Antonio.

MS. MORGAN: I'm Sally Morgan. I'm Department of Education, Office of General
Counsel.

MR. BOUNDS: Herman Bounds, Director of the Accreditation Group.

MS. HONG: Jennifer Hong, Executive Director of the Committee.

CHAIRMAN KEISER: Arthur Keiser, Chancellor of Keiser University.

MEMBER WU: Frank Wu, faculty member, University of California Hastings College of Law.

MEMBER PRESSNELL: Claude Pressnell, the President of the Tennessee Independent Colleges and Universities.

MEMBER PHILLIPS: Susan Phillips, University of Albany, State University of New York.

MEMBER BOEHME: Simon Boehme, student member.

MEMBER WOLFF: Ralph Wolff, President, Quality Assurance Commons.

MEMBER FRENCH: George French, President of Miles College, Birmingham, Alabama.

MEMBER VAN AUSDLE: Steve Van Ausdle,
President, Emeritus, Walla Walla Community College out in Washington state.

MR. MULA: Chuck Mula, Department staff.

(Remaining introductions made off-microphone.)

CHAIRMAN KEISER: I'd now like to introduce our Executive Director, Jennifer Hong.

MS. HONG: Good morning and welcome. As Chairman Keiser just mentioned, this is a meeting of the National Advisory Committee on Institutional Quality and Integrity, or NACIQI. My name is Jennifer Hong, and I'm the Executive Director, Designated Federal Official of NACIQI. As many of you know, NACIQI was established by Section 114 of the Higher Education Act of 1965, as amended, and is also governed by provisions of the Federal Advisory Committee Act which sets forth standards for the formation and use of advisory committees.

Sections 101(c) and 487(c)(4) of the HEA and Section 8016 of the Public Health Service
Act, 42 USC Section 296, require the Secretary to publish lists of state approval agencies, nationally recognized accrediting agencies, and state approval and accrediting agencies for programs of nurse education that the Secretary determines to be reliable authorities as to the quality of education provided by the institutions and programs that they accredit.

Eligibility of educational institutions and programs for participation in various federal programs requires accreditation by an agency listed by the Secretary. As provided in HEA Section 114, NACIQI advises the Secretary on the discharge of these functions and is also authorized to provide advice regarding the process of eligibility and certification of institutions of higher education for participation in the federal student aid programs authorized under Title 4 of the HEA.

Further, in addition to these charges, NACIQI also authorizes academic graduate degrees from federal agencies and institutions. This
authorization was provided by letter from the Office of Management and Budget back in 1954, and this letter is available on the NACIQI website, along with all other records related to NACIQI's deliberations.

And with that, I'm happy to hand it off to our very able chairman, Art Keiser. Thank you all for being here.

CHAIRMAN KEISER: Thank you, Jennifer. Our first part of the agenda is we have a consent agenda. And if I may, are there any third-party comments on the agencies that are out for consent agenda? Sensing none, are there, from the Committee, is there a call for removal of any of the items on the consent agenda? Sensing none, is there a motion to approve the consent agenda? Steven? Second by Federico. And any discussion? Sensing none, all in favor of the motion to approve the consent agenda, please signify by saying or raising your hand. Thank you. The motion passes.

We'll now go to our first agency,
which will be the Higher Learning Commission of
the North Central Association. And let me go
through the procedures first, how our standard
review processes are. The first, we'll have our
primary readers introduce the agency application.
The Department staff then provides a briefing
after the primary readers introduce the agency.
The primary readers question of the agency. The
agency representatives then provide comments.
The primary readers have an opportunity to ask
questions of the agency, including the standard
questions adopted by NACIQI for initial and
renewal applications. Questions by NACIQI are
followed by response and a comment from the
agency.

Then we have third-party comments and,
in this particular case, I think we do have a
third-party commenter. The agency responds to
the third-party comment, and then the Department
staff responds to the agency and the third-party
comments.

We then have a discussion of the
Committee and a vote. A final set of standard questions on approving the institution program and quality for initial and renewal applicants are then asked for.

At this point, I'd like to introduce Richard O'Donnell and Susan Phillips, who are the primary leaders on the renewal of recognition of the Higher Learning Commission. Are there any recusals on this particular commission? Ralph and Bobbie, if you would, step outside and we will see you soon. We'll come get you.

Okay. Who will lead the discussion?

Susan, Rick, which one?

MEMBER O'DONNELL: I'll lead it. This is Rick O'Donnell. Thank you, Art. I got a little over aggressive with my razor this morning and nicked my ear, and it won't stop bleeding, so if you see me dabbing my ear with Kleenex, that's why.

The Higher Learning Commission is a regional accreditation agency that accredits around a thousand degree-granting institutions in
about 19 states. It has been recognized by the Secretary consistently over the years, and it looked like a pretty clean report. So I will turn it over to staff.

MS. DAGGETT: Okay. Good morning, Mr. Chair and members of the Committee. For the record, my name is Elizabeth Daggett, and I am providing a summary of the review of the petition for renewal of recognition for the agency, the Higher Learning Commission, also known as HLC.

The staff recommendation to the senior department official for this agency is to renew the agency's recognition for a period of five years. The current scope of recognition for this agency is the accreditation and pre-accreditation, also known as candidate for accreditation, of degree-granting institutions of higher education in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming, including the
tribal institutions and the accreditation of programs offered via distance education and correspondence education within these institutions. This recognition extends to the Institutional Actions Council jointly with the Board of Trustees of the Commission for decisions on cases for continued accreditation or reaffirmation and continued candidacy and to the appeals body jointly with the Board of Trustees of the Commission for decisions related to initial candidacy or accreditation or reaffirmation of accreditation.

This recommendation is based on our review of the agency's petition and its supporting documentation, as well as the observation of an on-site evaluation in October of 2017 and a Board meeting in November of 2017. The Department did not receive any written third-party comments. Our review of the agency's petition found that the agency is in compliance with the Secretary's criteria for recognition.

Since the agency's last review in the
spring of 2015, the Department has received two complaints. Of the two complaints, one complainant did not avail themselves of HLC's complaint process. Therefore, it was not reviewed by the Department. The other complaint was reviewed by the Department, and the Department found no evidence that HLC did not follow its policies and procedures or failed to meet regulatory requirements.

Therefore, as I stated earlier, the staff is recommending to the senior department official to renew the agency's recognition for a period of five years. Thank you.

CHAIRMAN KEISER: Any questions of the staff? Sensing none, I'd like to call to the table the representatives of the Higher Learning Commission. If you would, please, introduce yourselves. You press the button when you want to speak, and when you stop speaking you turn it off.

MS. GELLMAN-DANLEY: Good morning. I'm Barbara Gellman-Danley, President of the
Higher Learning Commission. It's my pleasure to introduce Cheryl Johnson-Odim, our Board Chair, and Karen Peterson who is our Executive Vice President for Legal and Government Affairs. We also have a couple of members in the audience with us.

At this time, I would like to thank Elizabeth Daggett, Herman Bounds, and Jennifer Hong for your assistance as we went through the process of submitting our materials.

We're really glad to be here today, and we have spent some time responding to your questions on the pilot project, which is quite exciting and actually does align with the work we're doing at the Higher Learning Commission. Rather than go into them now, I have them on me, as needed, and whatever category we had actual information for we are prepared to discuss.

I also want to mention that, as Chair of C-RAC, I would like to point out that we have a graduation rate study we did that provides a great deal of information. I brought that with
me today in case you so choose to discuss it.

We are excited about the findings of that. We note the improvements in the data system recently by the Department, and we also have opportunities to discuss a very broad look at data that gives us a more accurate picture of the completion and success of our learners. As you well know, that's a moving target, and we want to continue to help whoever is involved to get the best data in front.

Just very briefly, when we started our study, we identified institutions that were below 15 percent graduation rate if they were community colleges and below 25 percent if they were universities. At that time -- and we used IPEDS and some of us used different approaches. So I will say that there were seven different approaches deliberately so we could test the research and determine what we may find.

It was fascinating that when we did extensive work looking at other data sources that we found that our original 367 institutions went
down to 101 institutions, mostly based on the fact that full-time first-time students is not sufficient, and we respect the fact that others have been added to the federal data set. That's really excellent.

We looked at everything, and we definitely took into account transfer students, which makes a substantial difference. In my professional life, I recall a very wise and successful young man at my college, which was not in the HLC region, Monroe Community College in Rochester, New York, who was taken from us for all the good reasons, a full scholarship to Cornell, and I just can't even imagine where he is today. That would be considered as a non-complete. So, obviously, that's just one of many examples of the value of counting transfer students, part-time students, etcetera. So I'm glad to discuss that, as appropriate.

There's a lot going on at HLC, and since I was here the last time or if we even want to look at five years from our last full
recognition, I'm rather excited to speak to this.

The very first thing I want to talk about is we did a very intensive strategic plan. We call it Beyond the Horizon. It has five tenets: value to membership, innovation, student success, thought leadership, and advocacy. The Lumina Foundation was impressed and supportive and asked us if we were interested. They had asked us a year earlier would there be some projects that we may want funded. We said what is highly abnormal to say to a foundation: we're not ready yet and we want to finish our plans so all the work aligns with that.

They gave us a half a million dollars to support two parts of that plan. One is student success, which is obviously very important to you. And the other is innovation, and they are not mutually exclusive and neither is innovation and accreditation, but it's a challenge, as you well know.

Some of the ways we are working on this grant, we have a think tank that we call
Partners for Transformation, and the rules are there are no rules. We want to hear from you, tell us what you think accreditation in the 21st century should look like. We have very strong individuals on that group: Gordon Gee from West Virginia University, Michael Crow from Arizona State, Burck Smith from StraighterLine. We think it's very important to bring third-party providers under the tent. We're very interested also in data analytics, and we have representation there. So I won't go into all the names, but they're a very strong group.

We have two groups in student success, one which is looking at the way they could define student success. And I will tell you that we have experts from NCHAMs and NILOA and other groups. And after a half a day, they couldn't come up with a definition, and they're the, you know, kind of leading experts in the country, because it's challenging. What do you really take into account? What does the student want? What were you looking for at the institution?
The other group is pretty exciting because we're putting together low-performing schools with high-performing schools to come up with projects. So we have an institution that is struggling, I don't want to point to anybody., and then we have the University of Michigan, and they're working together and coming up with an idea for pilot projects. So it's very exciting.

So those are two student success groups, and we have one final group in innovation which we're going to allow to try some pilot projects without penalty if they fail because you all have very prestigious backgrounds and you understand, in order to succeed, you'll have to allow some failures. And so, hopefully, none of them will fail. So that's a very active part, and we have people from all over our region and outside our region on this project.

We have institutional representatives, as well, of course. So it's a three-year project. I'd like to emphasize how important this is because our strategic plan is living. I,
myself, am a big strategic plan proponent, and it's tied to our budget, it's tied to metrics, and it's measurable.

I also would like to say that we are open to the new folks coming into the business. Well, Ralph is not in here and Simon. That kind of thing where you're really working directly with the workforce. The third-party providers that have opportunities to help institutions where they may not have the expertise, etcetera.

There's a lot to do in higher education, and I want to end by saying that we have a challenge, all of us, in higher education. The current status of what's going on on our campuses is very disturbing to us. I saw a sign at one of the marches on TV that said it feels like we're back in the 60s. And it's a shame that we have to deal with the kind of turmoil that our students and faculty and others have to experience. And as accreditors, we are trying to figure out when, if at all, we get involved. And I welcome that discussion, as appropriate.
But we're very concerned. We want a safe environment for our students, and we want free speech. And sometimes, you know, they go up against one another.

So I'm looking forward to your questions, and those are the end of my comments. And thank you for the opportunity.

CHAIRMAN KEISER: Rick, Susan. Any questions?

MEMBER PHILLIPS: Yes, thank you. HLC is doing some pretty exciting things. Thanks for the briefing on it and C-RAC, as well. I wanted to do just quickly the pilot questions that we have been asking, HLC being one of the largest accreditors.

So the questions that we all are concerned about are, you know, how are your institutions doing? If you were to take a temperature read on them, how do you think they're doing and how do you know?

MS. GELLMAN-DANLEY: Well, first I think it's important that all institutions can do...
better. No matter how strong the institution, there's always a part of an institution that has continuous improvement needs, and some obviously more than others. I will go through this a little bit to give you some data, and then we'll see how that impacts the questions.

Thirty-seven percent of our undergraduate students are on Pell. The percent of completers is not tracked by the agency, but it's at the institutional level. The graduation rates for three, four, and six years, 150 percent of normal time, we have 25 percent for two-year institutions, 50 percent for four-year institutions. That's not enough. It's better than some data would show, but it's not enough.

A couple of years ago, I wrote an article in a community college journal saying if you don't figure out the answer it will be figured out for you. And while we respect the students, and I certainly have a lot of years in that world, it's important to approve. We do not track debt, but we have several systems that
allow us to get that information, as well as the low graduation rate.

So just for those of you who may not be aware of all the intricacies, we have three pathways. An open pathway which is less touch, it's a move towards what's frequently called risk-managed accreditation. We have a standard pathway. It doesn't mean there's something wrong, it just means you're going to get a little more touch and we do move folks into that pathway if they're not succeeding in others. And we have a continuous improvement pathway, somewhat like the Baldridge model.

Within those pathways, we have our visits, but we also have annual updates and assurance system and assumed practices, and that kind of information does get gathered. And, indeed, low graduation rates comes up as something that we find we were going to do a desk visit, an advisory visit, anywhere from monitoring to a sanction. So that's how we handle that information.
While we don't track the debt, it's in about the $10,000 to $15,000 range for undergraduate students. And, of course, as you know, the federal compliance program has an opportunity to respond to that and we get some of the information there.

The repayment and default rates, while we don't track it 100-percent separately, we have non-financial indicators and that information is shown. We do collect the default rate, therefore, early in the year. If excessive, it comes in the federal compliance guidelines and we do follow up. So in the implementation of the federal compliance guidelines, we find a lot of information because that's our obligation.

What quantitative data do we use? You asked that question. Well, we're starting to use more because there's more available, and I mentioned some of that previously. We have non-financial indicators, we have financial indicators. We have all kinds of things that we can find: enrollment changes by percentage,
number of degrees awarded, changes in full-time faculty, student default rate, minimal full-time faculty ratio, student-to-teacher ratio, and graduation and persistence rate compared to peers. So that's a lot of information. We have established documentation, and we don't get as much information from the publics as we do the privates, which is interesting, of course.

How did we establish these metrics was your next question. We contracted with a gentleman by the name of Vic Borden who's a well-known institutional research person who advised us on selecting the appropriate indicators and our key performance indicators for our financial and others. However, this is a moving target. As we see the national concerns with graduation rates and debt, we are doing more follow-up research and correlation. So what we have now is not the final.

We look at the zones, as you know. There are zones for the financial indicators. If they're on Heightened Cash Monitoring one or two,
we get that. They definitely hear from us if they fall below the zone.

Let me go off script for a moment and say that trends analysis is probably the best thing that we can do. If we see an institution that has one issue, it may not tell us everything. But we see it in an institution that is constantly, for example, having enrollment declines. That's a trend that's a pattern. If we see the student debt is rising based on the financial rules of the federal government, that says something.

Another is increased enrollment. If we have an institution that's suddenly zooming in enrollment, one can only ask am I missing something? And I will tell you an example of a president who came who's at a distressed institution and he had about seven ideas of innovation that was going to fix this institution, and I said focus because you know in those cases it's a matter of let me just throw an innovation at something in their mind and we're
going to fix the institution. So we tie all these things together.

You asked any periodic analysis to determine the reliability and validity of the metrics? We review our policies on a regular basis, and sometimes it's clarification, sometimes it's changing the policy. We do this every three to five years. However, if we put out a policy or ask for information that's unclear, we follow it with guidelines and we'll do that immediately.

So just a couple more. You asked how might agencies establish clusters or programs? We do it by Carnegie classification. We think that's really important, and that's part of what we did for our graduation rate project.

So there are some other things on decision activities, and I'll hold off on that.

MEMBER PHILLIPS: Just two other related questions. One is you mentioned that you have three pathways, and I'm wondering how one gets into one of those pathways versus another.
And then the second one is, related to that, those institutions that are in those pathways, is there a different level of, a different rate of full accreditation probation, you know, the action decisions, are they different across those different categories?

MS. GELLMAN-DANLEY: Yes, the first pathway is AQIP, and Karen has been at the agency for a long time, so feel free to raise your hand if you want to add anything. What I'd like to point out with AQIP, there's a report that's due, action report, every year. And there's a, AQIP is an eight-year process, but there are visits at the four-year level; is that correct? Four years?

The standard pathway is a four-year visit. There are all kinds of -- everybody has to put in metrics every year. So I just want to say everybody has that. And then it's, after that, could be up to a longer period of time for standard.

But the open pathways is a ten-year
process, and they report out versus getting a visit in the interim. And that's a big difference.

So I'll use my alma mater for my doctorate at the University of Oklahoma. They have a special project that they do for the comprehensive visit. And I met with them a while back, and they were thinking about innovation, etcetera. But the idea is it's not a matter of the traditional approach. It's tell us something that really matters to your institution and that you're really working on how can you measure it.

So without going more granular, which we'd be glad to do, there is less touch, less face-to-face visits as in the final one, the open pathways.

Now, do we move people out of that? Sometimes, we do. So the very first thing we do if we see a problem at an institution is they get out of the open pathway and they have to stay out of it for a number of years because we just feel maybe, you know, they have issues that are going
to take some time to fix.

MEMBER PHILLIPS: And can one graduate from the improvement pathway to the standard pathway?

MS. GELLMAN-DANLEY: Well, the institutions, the continuous improvement actually stands by itself. So in that case, it's similar that if they aren't giving us what we need or if we find out, for some reason, let's say they've gone on monitoring for finances or federal financial aid, then they are moved into the standard pathway. So look at the middle one is the one that we're going to be all over you, although I think it's important to say we put the pressure on on a regular basis. When we find out an institution is on either of those two and they moved to standard, we have extensive discussions about is there a trend, is there something going on with all institutions that we have to look at those criteria?

MEMBER PHILLIPS: The related question was about the sort of distribution of decision
actions. So is it more likely that you would get a full accreditation in one of those pathways versus the other? What kind of negative decision proportion is there on each of those three pathways?

MS. GELLMAN-DANLEY: Well, we actually have more folks in the open pathway. They're doing quite well. But, Karen, could you respond to that?

MS. PETERSON: Sure. So open pathways is primarily designed for institutions with an excellent track record with accreditation. And so they are set up to have a comprehensive evaluation year four but a full reaffirmation in year ten and limited monitoring. We don't expect that they would do more than a focused evaluation to need more than an interim report.

If they have issues that justify more significant monitoring than they would be moved probably to standard pathway. Standard pathway also has a year four and ten review, but, typically, there may be more monitoring in
standard pathway of an institution, depending on its accreditation history, the issues with which it is really dealing with; and, thus, we have institutions in standard pathway that have not only interim reports but focused evaluations, as well.

Because of the type of institutions in standard pathway tend to have more risk, we also see those institutions are, I don't want to say likely but, as a group of institutions, maybe those institutions that emerge as moving into a sanction like probation or notice, depending on the severity of the situation.

So, again, our open pathway institutions tend to be our strongest institutions and the nature of the accrediting actions that are possible in that pathway are really geared for that kind of institution that needs limited oversight.

Having said that, we also want to encourage them to work on improvement. So improvement is a part of really every pathway.
But the way improvement works, it works differently based on the pathway. In the open pathway, we're encouraging an improvement project. In the standard pathway, improvement is embedded in the regular monitoring activities.

MEMBER PHILLIPS: And, overall, just, you know, a 60,000-foot level, what percentage of your institutions get a full accreditation, what get some kind of monitoring, what percent gets some kind of monitoring, some kind of --

MS. GELLMAN-DANLEY: I actually have that data. Let me find it, if you'll forgive me for a moment here. You can speak in general, and I'll take a look.

MS. PETERSON: Sure. Let me speak generally about that. The majority of our institutions get some form of monitoring. Typically, it's in the form of an interim report, and Barbara can give you more exact data in a second, because, again, we try to keep on top of institutional issues. But the way the pathways are set up and why we moved into a pathway
structure to begin with was to begin to move away from lots of interim monitoring and have that four and ten-year review. So we're seeing institutions on a much more frequent basis, and they're also working on improvement throughout the pathway, as appropriate to that particular pathway.

Go ahead with some specific data.

MS. GELLMAN-DANLEY: I'm going to give you some specifics, but there's more than you probably want to hear. But what I'd like to point out is, just to remind you, HLC has a unique approach where we have our team report after a self study and a visit. And then if an issue comes up or if it comes up between visits, that needs to be heard by our Institutional Action Council, meaning something is off. Then we move it to that, and then it goes to the board.

So I'd like to point out a number that jumps out. From September to December of 2017, we had 251 raised in front of the IAC. Some of
these things also can be lighter, you know, lighter issues as far as I want to try competency based, debt, etcetera. But we have a lot of issues that go in front of them.

As far as the hearings, we have hearings a few times a year. And most of what happens with those institutions, close to 45 percent, is assessment problems, and that means that they're not quite consistent in their measuring of student outcome. So that's part of it.

So we had, for example, back in 2013, we had 700 go in front of that group, 500, etcetera. So those do not mean that they're all problems, but it means they need either approval or there's a problem. Would you want to elaborate on that one? Is that accurate?

All right. And then we have everything from continued accreditation in that same short time period, 21. Let's go back to '16 '/'17. For a whole year, that's 105 continued accreditation. Placed on probation, 11. We
usually have anywhere -- that's a big deal, so we had 11 put on probation. We had remove from probation about 7, put on notice 7. But what is -- there are hundreds of monitoring that go on where you don't reach the sanction.

We have had, I think it's important to point out that when we were about to do withdrawal, we've had a couple of cases where the institutions closed or resigned from our organization. In some case, we have a faith-based institution that can't quite meet the standards, and they have their national organization that can join.

So I don't know how deep you want to go, Susan, but that's some of it.

MEMBER PHILLIPS: Thank you.

MEMBER O'DONNELL: Thank you. A couple of questions. Could you dig into a little bit just on student achievement and what, since you were last before NACIQI for full recognition, has changed, if anything, and how HLC, the standards it may have for student achievement,
what do you expect to possibly change upcoming, and really dig into how you're holding your institutions accountable for achievement.

MS. GELLMAN-DANLEY: Absolutely. Well, we are well aware not just of the importance of the federal government accreditors, NACIQI but the national discussion. Our entire conference is dedicated to that in a year, but we have a large percentage of our conference that's been dedicated to it last year, the year before, and this year. The fact that we set up those student success groups is very important.

The fact that we identified institutions and wrote them and asked for context, frankly, put a serious amount of pressure on those institutions. As one small example, I had a phone call with an institution that I consider a really great community college with a great national reputation. Keep getting grants, and I called the president and said how come you have, like, an eight-percent graduate rate? That's not okay. Now, in that case, I
know they transfer to universities, etcetera, but it's still not okay.

We have a persistence in completion academy that we are changing to student success academy. So it is a very salient issue for us. We've always looked at the numbers we get, but when we see the non-complete or low graduation rates, we're all over them and they get monitoring or a sanction.

So I would say if there's any topic that's a top topic, closely followed by innovation, it's student success. With our institutions, as we look at our criteria, we're revising some wording in our criteria. We went out to all the membership, and we are using the term student success.

The other part of that is a focus on students. One of the subgroups of our think tank is student-centered accreditation. Rather than institutional-centered accreditation, what's in the best interests of the students.

In our internal discussions, when we
talk about student success, when we see a proposal for something new or if we see a problem going on, our whole discussion focuses around what is the best decision for the student? What can we do to help the students be successful?

So we're dealing with it at a research level. A great deal of time, about 18 months, went into the C-RAC study. The way we looked at it, it was Carnegie classifications, a standard deviation above and below, by sector, etcetera.

Now, we get some interesting excuses, and we get some very good context. So if you take institutions that have low income, first generation student, it's going to be different than a prestigious private institution. We know that. Or a strong public institution. But I don't think there's anything we're paying more attention to right now than that.

MEMBER O'DONNELL: Great. Thank you. So as a follow-up, I'm curious when you talk about excuses. When I looked at the accreditor dashboard data, I just did my own kind of cut of
HLC institutions looking at low graduation rates, high default rates, low repayment rates, and came up with, roughly, 400 public institutions that, in my judgment, just looking at the data, would be weak. But in predominantly public institutions.

So I'm curious, as we think about the triad for instance, do you think states are not pulling their weight when it comes to holding their own public institutions accountable? I used to be a SHEEO in one of your states, so I have a lot of understanding of the political constraints. But I often found that public institutions seem to get passed for all sorts of reasons, and so I'm just curious your perspective, as you interact with the governing bodies in states, if you find that there's less resistance to really looking at a public institution that may not be doing very well just because it's public and it's a public-centered mission.

MS. GELLMAN-DANLEY: Well, I'm going
to give you the example. I was not a SHEEO but I was a vice chancellor in Oklahoma and Ohio, so decades ago in Oklahoma, so I've got the triad part down, minus the federal government piece.

What I'd like to point out is you're a business person, too, and you know you can throw all the money in the world at something, and if there's not good decisions or mission or strategic planning or metrics, it's not going to do any good. That being said, I think the states are overwhelmed, and I think that there have been a lot of things thrown at them that they just don't have the staffing to handle. That's not an excuse, that's a fact. I know in many states, once a state institution is authorized, that's it. But every five years, a private institution has to go through something akin to what we're doing here or when we have our accreditation visits. So one could wonder that. I mean, we could have a great debate about that. You're always going to be open. Extra dollars are thrown at institutions that have difficulties,
distressed financially, etcetera.

However, we have to look at the state issue. And when you add some of the data we did at C-RAC, those numbers would go down. But, nevertheless, some of the things are the government accounting standards that are coming into play where, if you have a, if you're leasing property, it counts as capital. That freaked out a lot of institutions because then their state rates will go down as far as their chief financial indicators.

In Ohio, if you're below the zone, all the board members and president can be fired. So I think Ohio kind of stays on top of it.

The states that I think are doing a strong job, Tennessee and Ohio and others that are doing performance-based funding because that's really holding institutions accountable and making sure that they're looking at such things as if you have a developmental ed course and you matriculate into a regular course, everything. Everything is taken into account.
And I'm not as familiar with Tennessee as I am with Ohio because I was there when we set that up, but we went from 100-percent enrollment-based funding to none enrollment-based funding. It was a very small part of it. The institutions went to no enrollment initially and the community college caught up a couple of years later.

So I think the states vary, though. And as you know this, as a former SHEEO, many of you know this within the states, we have states like Michigan that don't have a state coordinating board. To Karen's credit, and I would like to brag on her behalf and her staff that they have been holding state-wide meetings twice a year. So we invite our states in, and we talk about all these issues. We've talked quite a bit about student success, as well as innovation. And because of that -- and at our conference. So one in fall and one at our conference in the spring, Karen and her staff have established amazing relationships, and we have state people on our think tank and other
groups, as well.

So it's a really challenging time for the states. We have states like New Mexico, Oklahoma, and others that have lost well over 10 to 15 percent compounded to even higher than that because they lose it and then no more is added. So while there are really no excuses, that's a problem.

So you take Illinois, no budget for three years. And then when they gave them some money, they didn't go back. They just said, okay, we'll give you money from April to July. So many of you are presidents or have been presidents or high-level positions or even think of your businesses. What if your cash flow was cut off? So then we see an institution that they're going to lay off 300 faculty or position some faculty, and we say we've got to look into that.

So I'm very excited about our relationship with the states. But we don't always agree.
MEMBER O'DONNELL: Great. Thank you.

And I have one final question, switching to graduation rates. I've read the C-RAC study or skimmed it, and I congratulate you and your peer accrediting agencies for digging into this. The one thing that struck me in reading it is a lack of focus in the report on admission standards and admissions criteria. And I'm curious to get your perspective on that because it seems to me that with predictive data and predictive analytics, while it's great to predict if a student is on the right pathway, our institutions enrolling students they know aren't going to be successful and I would say be predatory and aided by the federal government, but I'm just curious how do you look at institutions' admission practices to make sure that they're actually enrolling students, even if they're open admissions, that they're counseling enrolling students who aren't going to drop out in six months and be worse off than if they hadn't enrolled?

MS. GELLMAN-DANLEY: Well, that's
actually a great idea because this is step one. But I'd like to use an example, Arizona State University which is known for innovation. They have students success guides, and they have data analytics that I've said facetiously you can't walk around the campus and they know where you are. So they have interdiction strategies throughout the entire process.

I think we all know that when institutions are having difficulty, they come up with quick fixes, and those quick fixes are letting anybody in in some cases. And I'm talking about the small privates.

When we use the term predatory, I'm quite agnostic by sector because that could happen at any institution. We're all equal here, whether something is going right or wrong. So while years back there was some secret shopping going on, I would hesitate to say that there could be interesting secret shopping at public institutions, at private colleges, etcetera.

So across the board, what you're
saying is absolutely right. It's the same thing in business if you bring a customer in. You're not bringing them in one time. You're bringing them in, I used to work in cable television for a while, you don't want a turn. You want them to actually stay in because the cost of losing a student to that student is enormous, and I would say thank goodness for community colleges because if it weren't for community colleges there are many who won't even get in the door or wouldn't be able to reverse transfer back to a community college.

But, boy, you couldn't be more right. What happens with that group -- now, let me tell you one of the weaknesses, K through 12 counselors. We have found a lot of agony with K through 12 counselors who are misleading or they just don't have the background or they're not getting the training for their advising folks. And they just are sending them in the wrong direction.

But many institutions for specialized
programs, such as nursing, will do pre-testing and you have to have a certain grade, a HESI test that's called. And so I think I actually love the idea. I think it's really true that what happens at the beginning is the most important thing that you're putting down the right path. Don't want to kill their dreams, but I had a young person who was, she had it in her mind she was going to go to Oberlin, and I said let's sit down and look at the Oberlin ACT scores, and hers was, like, not close to that. And what if you get somebody in if they're going to succeed? You haven't done them any favors. And you also shouldn't guide them toward the wrong major. But you got to get them in a major because if you don't get them in a major we know that non-declared are the students we lose the most.

MEMBER O'DONNELL: Great. Thank you.

CHAIRMAN KEISER: Okay. We open the question now to the rest of the Committee. John? You're going to be hard to see so make sure you wave. John and then Claude and then Simon and
then maybe I'll take a question.

MEMBER ETCHEMENDY: So this is an odd question, I suppose, but I've often wondered how you manage 944 institutions. So I'm on another regional commission. We have about 150, and we feel overwhelmed by that number.

How many do you have going through the open pathway, and is that, you say that's light touch. Is that part of your way of handling the numbers that you have?

MS. GELLMAN-DANLEY: That's not an odd question, but, no, people don't get into the open pathways because it's easier to handle for us. It's about those institutions being stronger, and it's about two-thirds actually.

MEMBER ETCHEMENDY: It's about two-thirds.

MS. GELLMAN-DANLEY: But we have -- a shout out to the most amazing staff. We have about 60 staff, and we have 1800 volunteers that are peer reviewers and we bring in consultants, etcetera. And the average load from one of our
vice presidents is about 110 colleges that they're responsible for. But keep in mind that one big case could get their attention, a change of control, substantive change, something like that, but a lot of those cases it's rolling when they come up for the information that is needed from them. So it's not a matter of everybody is coming at once.

We had board meetings where we had -- prior to me. I guess I didn't luck out. We might have six institutions in front of the board, and we had one recently where there were 22. And that means few of them get off probation but most of them are in trouble.

We actually have it under control, and I will say this might sound odd, too, so odd for odd, I guess, we're a commuter city. So everybody can't stay until 10:00 at night, so they get their work done, they bring it home. They're available to their institutions. And I think all accreditors should move more expeditiously.
So I will speak on behalf of HLC. My colleagues, sorry, I'm not speaking on behalf of anybody but HLC. Because sometimes an institution needs to get the response in order to be successful and serve their students, but it seems huge, of course, but we're handling it.

MEMBER ETCHEMENDY: It's very impressive, and could you, with the people, the institutions that are on the open pathway, how much touch do they get?

MS. GELLMAN-DANLEY: I'm going to have Karen give the specifics because she was there when it was written. Karen?

MS. PETERSON: Well, again, in the open pathway, they have two evaluations, one at the four-year mark and one at the ten-year mark. And so, obviously, that involves a liaison, a vice president from our staff, as well as a peer review team on each one of those. Then they also have a quality improvement project, again generally facilitated by a liaison, and we have a different committee that reviews that quality
improvement project.

   So, you know, there are a number of peer reviewers involved in that case, and a single liaison that works with that institution. But as you can see, there's time in between, obviously, because we have a four and ten-year mark. So the cases are staggered.

   And, in fact, when liaisons are assigned cases, we look at the pattern so that they don't have too many cases in a given year. So they are able to work with each institution that's coming up in that particular year, and then, obviously, they'll move on to the next year of institutions as the years progress.

   MEMBER ETCHEMENDY: Okay. Thank you. It's very impressive.

   MS. GELLMAN-DANLEY: Thank you very much. I'll tell the staff. They'll appreciate it.

   CHAIRMAN KEISER: Claude?

   MEMBER PRESSNELL: Yes, thank you. Well, I want to stay on the theme of the open
pathway in particular. So what I'm interested in is how many, what are the institutional types that you got in the open pathway, as well as your standard pathway? And I know the Baldridge is a whole separate thing. I totally agree, you know. I was at an institution that went through the Baldridge, as well.

And the reason I ask is because a lot of times people believe that risk-informed approach favors one particular institution type than another. So can you, like, how many community colleges, how many four-year institutions, how many public, private? Just ballpark. It doesn't need to be --

MS. GELLMAN-DANLEY: I think it's distributed the same way the number of the colleges are because we have universities that are well respected that might not be so good in assessment or something like that. They're not in the open pathway. But it's distributed by the number of same, if our percentage, you always have to figure about half are community colleges
as far as the actual number in the country, so our percentage is across the board.

Some of our smaller faith-based or tribal institutions, they need more touch. It's just how it is. But when it comes to large publics, regional publics that are smaller, the privates, obviously, I don't even have to look at the list, you're going to know a Grinnell is in there. I'm right, aren't I?

So you're going to have that, but there are also institutions that are really staying after what they need to stay after as far as the standards, etcetera. But we have no hesitation to move people off that if there's something wrong.

MEMBER PRESSNELL: Okay. So, you know, we're trying to be sensitive, as a committee, to the call for deregulation but maintaining quality. We want to make sure, absolutely sure that the institutions are meeting their mission and purpose related to student success. And so if you could just, if you could
wave a wand, are there things that we're tracking that are really burdensome and not necessary? Are there other things that we need to do a better job in looking at related particularly to student success? Because we're all about the students, right? And, you know, the further we get away, the more we think we're not but we know we are. It's all about student success.

So just if you think through a deregulatory approach, do you have some thoughts on that?

MS. GELLMAN-DANLEY: Yes. I have to take off. I'm chair of C-RAC, so I'm speaking as the HLC president, but we, as a group, have looked at the fact that, for example, there are ten regulations -- I've got it in here somewhere, but I also have it all in here -- recommended to be removed. Some of the indicators, like financial, etcetera. And we're fine with them being removed, but there's some that we still would apply. One could have a big debate about the financial part. I would argue to the Hill
that that's an issue when it comes to looking at institutions. But we don't have to be told that.

I think it would be at great risk, I'm going to say, we think the credit hour is pretty old fashioned. All right. I'm just going to say that. And competency-based education is not new. I had it in the 70s at my first place. And we think there are some things like that that are really holding back innovation.

I agree with fully that balance with quality is absolutely important. We don't want a free-for-all. But we also want a little free will. Students make choices and institutions can make choices. I'm not in favor, we are not in favor of bright lines, but we will always continue to collect those kinds of things we've talked about for trends analysis.

Let me see if there's anything else. There's a few other things. But the key thing is, as you may know, there's ten indicators the federal government requires. In the House version because there really isn't a Senate
version yet, they're recommended to be removed. And some of those we spoke as accreditors and said, you know, as much as we would love complete deregulation in some cases, we're going to hold on to some of those variables to continue to look at those.

So I think it is a balance with quality. And we spent quite a bit of time doing federal compliance issues, and our members and our survey for our strategic plan were very clear: get into the quality assurance business and try to stay out of the regulatory business. So we think some of the information that's gathered could be gathered by the federal government.

To give you an example, the federal government knows that there's a Clery Act, but we have to ask if there's a Clery Act response. And so, you know, these things take a lot of time in our visits, and some of our peer reviewers have said we don't have the capacity at some of these institutions that get so hung up on the federal
then get into other things, so we want to make
sure we do that.

Yes, it's going to be very interesting
how it unfolds, but don't let go of the quality
part. The only thing I would say very strongly
is one metric is not enough.

MEMBER PRESSNELL: Just one last
question then. You mentioned the issue on the
credit hour piece, and, obviously, with CBE and a
lot of things going on, it doesn't fit well. So
do you have -- what would you recommend? I mean,
because so many things, there are so many things
related to the credit hour. There's no doubt
that the credit hour does not fit well in a lot
of situations. Do you have recommendations or
thoughts on that?

MS. GELLMAN-DANLEY: Yes. Well,
partially. The credit hour, of course, is almost
similar to seat time in the K through 12 system
and sitting in a seat doesn't guarantee. I think
the outcomes focus would get you what you need.
What are the goals and objectives of the course,
what does the curriculum require, and how does
the student achieve those? And if they're not
being achieved, then that's a negative measure.

I can think of one quick example. My
son was in college, and he was in an accounting
class and the faculty member put everything up on
line as a backup. And he said why do I have to
go to the class? They're counting how many times
I go to the class. Of course, this is an
educator. You can imagine it was an interesting
discussion. But he was a self learner, and he's
saying why do I have to sit there and why does it
have to be 16 weeks? And those are the kinds of
things we need to be looking at being less
prescribed, but, as we do with all our policies,
holding our institutions accountable for having
fair, equitable standards that they apply on
their campus and that they're consistent. So no
deals. You know, you're not cutting a deal with
one department. It's across the board.

Would you add anything to that?

MEMBER BOEHME: Well, thank you so
much for coming. I'm excited that you guys are here. Last time you showed up by yourself, so I'm glad to see that you've brought some --

MS. GELLMAN-DANLEY: I brought some moral support this time.

MEMBER BOEHME: You did bring some moral support.

MS. GELLMAN-DANLEY: And then brains.

MEMBER BOEHME: And it's also good that, I think, if I remember correctly, the board meeting was scheduled at the same time.

MS. GELLMAN-DANLEY: Yes, it was, and we're grateful it was not.

MEMBER BOEHME: Right. Well, we're glad that you guys continue to value NACIQI and take this seriously, and I was impressed with your presentation today. And my question will be almost the same as it was in June 2015 when we got into quite a discussion about, and we disagreed, about 28 institutions I identified in 2015 that had single-digit graduation rates. And looking back at the transcript, you cannot speak
to them, and so I was wondering first if you have an update on those 28 institutions. And the second part is where are they now and what you have done?

MS. GELLMAN-DANLEY: All right. So I could refer to a few tabs. I'm going to try to do it at this level, and then I can get specific you want. But let's take one you mentioned that did not have first-time full-time students. So with the new data, a lot of those institutions drop off. So if they're degree completion and the idea is that you're getting your first two years somewhere else, they're not on the list.

And so we took very seriously that discussion and looked at our metrics and how we're measuring things, etcetera. Some of them are still on, and I know you called out some. Let's say close to where I live, all right? And so we talked about that, and some of those metrics are still low and there have been monitoring, there's been more than monitoring. Some of those institutions, let's say where I
live where there's multiple institutions over one
title, one name, you know, a larger one, they've
improved some but they haven't improved enough.
And then they happen to be in a situation with
the state that has total disinvestment in many
ways.

So I would have to say that with the
data that we had, we had about 400 on the data.
When we did the work for C-RAC, it went down to a
lot less than that. So that's not saying they're
okay. It's saying that by the new metrics that
are available by the department and the transfer
students, etcetera.

The other thing we've done with these
institutions is we follow them on a regular
basis, and there have been some sanctions and
some that you mentioned. Some you mentioned were
already on probation. Some have moved toward
show cause and other kinds of things.

So we heard you, but we also knew
there were trends going on. The context that we
gathered scared the heck out of everybody, and
that's sometimes okay. And we're really focusing a lot more. I'm going to ask Karen if she would add to that because we've talked about this a lot on site, if that's okay with you.

MS. PETERSON: So I think, I suppose we can get into more specific cases if you wish, but, again, there's a range of institutions on that list. Some of them, as Barbara properly pointed out, did not have first-time full-time students to begin with. As you know, this is a big issue in trying to understand data. Other institutions on that list were focused at the graduate level. Again, limited first-time full-time metrics which really didn't provide much information about that institution.

We also had a number of institutions on there. As you know, they serve a particular kind of agenda. They are open access. As a society, we've generally made a commitment in the past to those institutions, understanding that bringing in students is important. Helping them get an opportunity to have an education is
important, but it doesn't absolve the institution of responsibility to work as well as they can to get students through to completion.

So most of our institutions, in fact the vast majority of them, as you can see from the C-RAC graduation study, are working on various projects to get students through more swiftly and efficiently towards graduation and completion. And it was interesting when that data came out because I think we found that there's sometimes an assumption that institutions are not working as hard as they can, but they are. But this is a needle that's moving slowly because it takes time to move a student through to completion. But most of our institutions have projects in place to do that and are seeing modest improvements but, over time, they're seeing some improvements in their outcomes.

MS. GELLMAN-DANLEY: One of the things, if I might add, Simon, that we do is, annually, we analyze every decision that's made
and what are the key areas that are causing the institution's problems. So as I mentioned, assessment is the first one. Finance is the second one. Governance is on there. There are a variety of issues. And when you have institutions that have an assessment problem, you probably do not have an assessment officer or appropriate staff to make sure it's applied consistently across the organization. So we put a lot of pressure on that.

But I'm looking at some lists, and I remember a couple of the schools you mentioned, but I'm looking at some lists as far as institutions that we know were put on probation or removed from probation or show cause, and they're related to the issues that you discussed.

MEMBER BOEHME: I was wondering if the Board could comment about and give insight to NACIQI, when making these decisions, how graduation rates have played. I was very discouraged from the June 2015 interaction because I think there was a real inaction. What
I am starting to see is, and I think everyone here has read the article in Inside Higher Ed about C-RAC and that report, and it seems like now it is being a serious concern.

I want the Board to comment and I want to see how the organization has started to value that because, as everyone knows, what's the point when you don't get the credential, when you don't get the skill, when you don't get something. Instead, as we know, debt is one of the biggest issues to students and to higher education and policymakers here that you graduate and you have nothing to show for it except these debt payments.

MS. JOHNSON-ODIM: Let me say three things as initial observations and then to give you some ideas of what we've done at the university where I am. Now, the university where I was provost, now provost emerita, we have a student population that is about 42-percent Latino, about 9-percent African-American. And the ACT, the average ACT score varies between 18
and 24. But our graduate rate is between 70 and 80 percent, so it's quite high. Now, of course, this is a six-year graduation rate.

But I wanted to say in terms of observation first is that I think that one of the sort of elephants in the room is this issue of access, and it's both a philosophical and a practical issue. And in the last 34 years, we all know that the entering student population has changed a great deal. It's not just about racial and ethnic diversity, but it's also about people who are older coming back to school. The number of people who are doing that is probably half or more of the student population that we're dealing with these days. So we have a different kind of student population.

So we also have, when we talk about access, it goes to more than letting people in with low ACT scores, etcetera, because many people now with the access are coming from places where, at the secondary level, they are ill-prepared and that has to do with, you know, K-12
education. So if you are graduating from Evanston Township High School where my children went, you have, you know, five labs and, you know, so on and so forth, but you could graduate from a Chicago public school where a teacher who has a degree in Spanish can be told that they're going to teach biology or physics, so you can imagine that the biology course you get is different.

I say all this to say that we're getting a student population that needs other kinds of touches in order to -- and, also, perhaps just the last thing before I tell you some of the things we've done at my institution is to say that, you know, both what Karen and Barbara have spoken to in terms of, you know, what goes on at institutions is that, you know, it is, it's about the mission of the institution. So the board looks at that, but we have a very strong and a very independent board. And we certainly do not hesitate to say, based on graduation rates and other things, that an
institution needs to receive one of the four sanctions. And if you look over the last, I'd say seven or eight years, more institutions have been placed on some kind of a sanction for a much higher touch.

So what are some of the things that we look for in institutions from the perspective of the board and some of the things that we've done at my institution that have been successful things? One of them has been having -- you know, some of these are prior resources -- a center for teaching and learning excellence, and that center for teaching and learning excellence does all kinds of things. Not only does it do peer tutoring and professional tutoring, which is very important, but it also trains teachers to deal with new populations.

For instance, as I said, we have about a 42-percent Latino population, so we have seminars and webinars on teaching courses for students who are bilingual, whose first language is not English. And there are a large number of
students in that pool, not just Spanish-speaking students but students from Eastern Europe, students from Asia who are the new immigrants from Asia, etcetera.

Another thing that we have required are mid-semester reports so that halfway through the semester, you know, a teacher has to report on how a student is doing. Other things that we have done include enhanced advising. Some are bridge programs so that students who are coming into an institution have a bridge program. They talk to them about how to study, how to manage their time.

And I'm giving these examples because these are some of the things that the board looks to institutions that have low graduation rates to see if they're doing or to, you know, ask, you know, what have you tried, what are the innovative ways that you have attempted to increase your graduation rate?

But, you know, graduation rates do go to all kinds of things. First-time full-time
students is not a good or accurate measure. The different student population that we have now, the number of our institutions, students are coming -- and these are not excuses, it's just the reality of the situation -- students are coming who are not coming to get a degree. They're coming to do a particular kind of program, and that's what they're coming to do. So, you know, they come to a community college one year, and then they go to four-year institutions, so they don't graduate from the two-year college but they may graduate from the four-year college.

So, you know, I'll end by saying, and sorry for so long an answer, but I think it's a really very complicated question that our board and I think the boards of other regionals, but I know our board in which I've served for ten years and I've been in higher education for 40, that our board is a volunteer but hardworking board that takes very seriously the most important thing that we use as sort of a measure is that
student success. Students are the primary reason that we are doing what we're doing.

MS. PETERSON: Let me add one more thing to that in terms of specific findings that our board has made over the past three years or so and in terms of what's cited when we have an institution put on probation or on notice, and it's very common for low graduation rates to be one of the findings, questionable finances, concerns about integrity, those are the kinds of things that come up in an ongoing basis when we put an institution on notice or probation.

MS. GELLMAN-DANLEY: May I add a quick anecdote, Simon? Would that be okay? I recall a board meeting where we were looking at historically black institution's recommendation for show cause. And it was a very long discussion, and all the issues were raised about concerns for the students, etcetera. But at the end of the day, the board said it's in the best interest of the students that either they get their act together or they're closed. And it's
agonizing discussions. I don't think when we were observed by Beth we had a pretty hot discussion but we didn't have an agonizing discussion. But we have folks on that board who represent all different sectors, and I will be candid and dare say they walk out depressed about the decision they had to make but they believe it's in the best interest of the students. They're not afraid to do what they need to do.

MEMBER BOEHME: Great. Well, and thank you for that insight. As the largest regional, I think people are looking to you and looking for you to be a role model. And that's why I was so disappointed in 2015, and I continue to be optimistic that you will take graduation rates and you'll take also default rates seriously, as well.

I agree with you, too, that the data is not perfect, but what we do have oftentimes does not paint a pretty picture. And just because it's not perfect, we can't necessarily discount what we have. And, hopefully, with this
administration, we'll work on having better data and looking at state-wide systems. We'll also be looking at ways that we can have a more accurate and better conversation.

But also as the accreditor that has the most institutions, if the dashboard is correct, the most institutions that receive over $200 million of taxpayers' dollars, there are some institutions, as you know, that are not that impressive in terms of graduation rates, default rates. Some of them, I mean, hundreds of millions of dollars.

MS. GELLMAN-DANLEY: I think the small privates are, I don't know specifically what you're looking at, but let's take a couple of sectors that would come out. The small private universities are really struggling. There are new creative options, everything from boot camps to all kinds of competition online, etcetera. The challenges that they are the economic engines for their communities if they're in rural areas, etcetera, but if they're not doing well we can't
rescue the community, so we will address it. And then, of course, community colleges for reasons we've discussed.

MEMBER BOEHME: Right. So let's say Kent State University, which is a public university, 11-percent default rate, a little bit better graduation rate, 43 percent, and then, to be balanced, a for-profit University of Phoenix, 13-percent default rate, graduation rate 16 percent. I mean, these are two very well-known institutions, lots of students go to them. They receive hundreds of millions of dollars of taxpayers' money. Can you walk me through in terms of where those graduation rates may or may not, obviously 40 percent goes beyond the C-RAC 35 percent for four-year --

MS. GELLMAN-DANLEY: Well, we'd love it to be 100 percent, so I certainly want to start by saying that. Karen may be able to address more specifics, but I'd like to start in general. I believe there's been a lot of focus at the University of Phoenix in the past several
years on assessment and student outcomes. I think they're really working on it, but there's no question that the students that they take are more at risk. All right. So that's a big part of it. And we absolutely believe that they should have higher rates, but they're moving up a little bit based on the chart. So progress is one thing, all right? Getting to a goal.

Because I was in Ohio, I will tell you that, actually, Kent State is a strong institution in general. It has certain programs that are extremely well known. They've had strong leadership. But those are students who aren't going to the Ohio State University, which has become very difficult to get in within the state. They made a decision to become a research university. And they are place bound. And one of the things with Kent State, I'm not sure if they're all separately accredited, the regional branch campuses, so that's feeding into the graduation rates. I believe they have up to seven or something like that branch campuses.
They call them regional campuses, and those numbers are counted in the whole and those are folks that aren't leaving their region and they do offer some associate's degrees, so they're very similar.

But they don't get any more of a pass than anybody else. And we have active people who were engaged with that institution and their representation. So I agree with you it should be higher. But I do want to say, in the case of Kent State, there's a lot of branch locations that are in very small areas or right in an urban area, like right near Cleveland.

Karen, would you add to that?

MS. PETERSON: I think the point Barbara is making is a critical point. We have two institutions with very different missions and very different student populations. With the University of Phoenix, we're dealing with students, it's going to take them a number of years to get through. Some of them don't get through because their life changes in the
1. process.

   With Kent State, we are dealing with an institution that's, again, a large research institution, different kind of focus, different kinds of students. They're going to go through more quickly, more effectively. But, again, they are a different group of students with different goals, less likely to have a life interference that's going to stop them from completing.

   Also, the goals of students at a place like University of Phoenix are different. Some students do come in to take a smaller group of courses. They may not, at the end of the day, be there to get a degree program. Regardless of how we sometimes try to count them for Title IV federal financial aid purposes. That's probably less likely to be the case at Kent State.

   So, again, we have to be careful when we're comparing apples and oranges.

   MEMBER BOEHME: And there's no denying I picked two completely different universities, but it was designed so I could see how you guys
think about this because I think what is so unsettling is, yes, everyone has a different mission and we should look at each institution as something unique. But if it's true that you want to build a student-centric accreditation model, there are some very basic tenets that students want to see.

And you're absolutely right. You know, my dad just went to a community college and took three classes and he was done. He certainly doesn't help Kalamazoo Valley Community College and its rating. It seemed like you may have used someone as an example, an unnamed person in your example. I transferred and I ended up at a different university. I didn't help the University of Michigan's, but I did help Cornell's.

There's no disputing that. But if it is true and regionals are going to come up here and say that this is a student-centric model, which I do believe that you are attempting to do, there are certain things that oftentimes, more
times than not, the students that I've spoken
with, adult, and also the more traditional
students, which is less than the adult learners,
is oftentimes many of them do want to complete,
and that is a basic tenet that there are these
certain things.

And so I think I've seen and I'm being
persuaded that, since the conversation in 2015,
that there is a real growth around this
correction, I think, within HLC, but, again,
you know, I'd like to see more the national four-
year graduation rate for public institution is
under 35 percent and obviously with this C-RAC,
in Paul Fain's article, there were 397
institutions or about 14 percent of the nation's
regionally-accredited colleges have a six-year
graduation rate below 25 percent, and HLC is the
largest regional. You have a big responsibility
as part of this.

And so I'm starting to see this. But
I guess I have to go back to the original
question. I would like to know, of the 28, in
exact numbers if possible, how many of them are in probation, how many of them are in show cause, or how many of them have had no action? Because for a university or a college to still be in the single digits and receiving taxpayers' dollars is a ripoff to the students and to the taxpayer.

MS. GELLMAN-DANLEY: Well, I use one example. I don't have the 28 list in front of me, but I have a list. And just a quick correction, if you add transfer students, that number goes from three-something down to 101. And if you start adding part-time, it even goes down lower.

But the examples of the community colleges I gave you, when you start adding the transfer, they're off the list. They wouldn't count on your list anymore. You don't have all of that in the data, but it is the data you have available and it is better than it was a couple of years ago.

So I think you'd have to call out a name of an institution. I can't remember all 28,
although we try not to do that here. I mean --

MEMBER BOEHME: Chicago State University was one that we talked a lot about in 2015.

MS. GELLMAN-DANLEY: Okay, okay. Well, and that's the one I referred to previously. Again, Karen, do you want to address any more about Chicago State?

MS. PETERSON: Well, I can come to Chicago State in a moment, although, again, I think we need to be careful about discussing institutional cases in great detail because we don't have the extensive institutional file in front of us today. But I will say something that I think is important to capture here as a point. Yes, the numbers are important and, yes, we need to focus on improving them. But how do you improve that? And that's a critical question.

As accreditors, we look at how students are served. Developmental, for example, tutoring, mentoring. Each kind of student population, we're acquiring a different group of
services to help them succeed. If students are there and they want to succeed, that's the first goal. But the second step is what is the institution doing to help? Our core components do require our peer reviewers to take a close look at that and see if the institution is really committed to providing robust services to help those students succeed.

MEMBER BOEHME: And I don't want to upset my colleagues because this question has been going on for so long. But if it's true, and we can argue until we're blue in the face about these numbers and these universities, but I will stop asking questions if they cannot respond to that question.

MS. GELLMAN-DANLEY: I've got a number in front of me. It's gone up. I'm sorry. I didn't mean to interrupt.

CHAIRMAN KEISER: The question, just to follow-up on Simon, I have two questions but the first one will be how many community colleges or public universities have been removed from the
accredited list in the last, since '15? I think that's where you were trying to go.

MS. GELLMAN-DANLEY: All right. Hang on a second. I can -- as far as removal, we've had a couple of cases where we've moved toward recommending withdrawal or show cause in a couple of institutions --

CHAIRMAN KEISER: How many have been --

MS. GELLMAN-DANLEY: That we have removed their accreditation? We have not.

MS. PETERSON: For a public institution, is that what you're asking?

CHAIRMAN KEISER: Public institution.

MS. PETERSON: We haven't had a case of a public institution have its accreditation withdrawn.

CHAIRMAN KEISER: And I think the issue that Simon was talking about specifically where you had a state that stopped funding and you've had huge layoffs of qualified faculty. I mean, you had a whole lot, I mean, I can only see
what I read in the press. It's not just -- how could you not take a final action upon that institution with, you know, financial, performance, faculty issues? It sounded like they were very significant. Why would you not take an action over the last three years in that particular case?

MS. GELLMAN-DANLEY: Well, we have taken actions. There has been monitoring. And Karen and a group of people visited, but I will tell you --

CHAIRMAN KEISER: Well, when will you take, when will you take a final action on an institution like that?

MS. GELLMAN-DANLEY: When there's trends across the board that everything is failing, not just graduation rates.

CHAIRMAN KEISER: Well, but you had also talked about that in terms of the financial commitment of the state and the layoff of serious parts of the faculty. You know, that seems to be a very serious academic issue. You talked about
making excuses. It sounds like, because it was a public institution, we make excuses.

MS. GELLMAN-DANLEY: Well, let me tell you what happened in Illinois, and I think I can clarify this a little bit. We're non-partisan, but we did contact the state and we let them know the risk their institutions would be at if they kept proceeding in this direction. And while we'll take no credit, there was a budget that finally came out after that.

As far as these institutions, a lot of the numbers are staff that are presented as staff that are not directly related in the academic area. But we've actually done on-site visits and we've followed up and we've done monitoring. It's a very challenging issue, and I am going to just be very candid with you because you're kind of kicking someone when they're down when their state has so much money, but it's not fair to the students not to do well.

CHAIRMAN KEISER: Would you take the same action to a private institution, whether it
be for-profit or non-profit, and give them that
same length of time that you did where you would
have in a public institution?

MS. GELLMAN-DANLEY: We would follow
our standards, so, no, we would not do anything
different for any institution. So if we put an
institution on probation, they have up to two
years. We only had one rare case where we
extended probation for six months because they
were about there, but we treat them all the same.
I won't tell you, though, it doesn't tug at us,
when Wisconsin cut $300 million out of the
budget, that it doesn't tug at us as to -- we get
involved. We don't look away from it.

CHAIRMAN KEISER: Do you have a common
definition for graduation rate or retention or
completion? Do you have a singular definition?

MS. GELLMAN-DANLEY: I think we look
at debt, we look at --

CHAIRMAN KEISER: Do you have --

MS. GELLMAN-DANLEY: A definition?

CHAIRMAN KEISER: -- a definition?
The reason I ask is, in Florida, the community colleges got very creative in creating completion points, and they get mixed up between graduation and completion points. And if you finish a course, you earn a completion point. Do you have a single definition in which all institutions can use to define what a graduation is?

MS. GELLMAN-DANLEY: I will not say we have a single definition. I --

CHAIRMAN KEISER: So how can you compare the data if everybody, if all the institutions have the ability to create their own definitions?

MS. GELLMAN-DANLEY: Go ahead.

MS. PETERSON: Let me just address that question. We collect data on a regular basis. It's IPEDS-based. So are not -- if an institution wants to track its completion points, they can do that, but that's not what we're collecting or reviewing. That would be something they would do on their own for their own personal edification, but we're looking, at this point, at
nationally normed data.

CHAIRMAN KEISER: But the IPEDS is first-time first-term, so all the other data is not reported to IPEDS. So it is self-reported, correct?

MS. PETERSON: Well, data is self-reported to IPEDS, but, obviously, that data is supposed to be correct, and we rely on the federal government to ensure that. But as you know, the IPEDS system is working to improve to get part-time students and other kinds into the mix.

MS. GELLMAN-DANLEY: Well, I would like to say one concrete thing we're doing, and that is we're buffing up our institutional research. We're not an institution, but we call that our research capacity. And what we've done is we're trying to determine, based on our own work for the C-RAC study, whether or not we should, which indicators we should use as far as College Navigator, the Scorecard, IPEDS, and all that. And we're trying -- and the Carnegie
classifications.

One of the discussions that's taken place within our think tank are really looking at the Carnegie classifications. Now you're getting into differential accreditation, all right? And do you look at the community colleges one way, do you look at the universities a separate way? And at this point, we're not doing that. Everybody has to meet the standards regardless of their circumstances.

CHAIRMAN KEISER: But if you don't have common definitions, I find that, you know, this is one of the things that's bothered me for a long time, it's like in the credit hour definition, Carnegie 15, 30, 45 hours, based upon the type of the course that's being taught, my son went to a school where a three-hour course was 30 hours, and that was purely electric course, which, under the Carnegie, would have been half of that.

So how, if we don't have common definitions, how can accrediting commissions make
good judgments when it's all over the board and the data you're using is really self determined?

MS. GELLMAN-DANLEY: You're asking the same questions we are, which may not be a satisfying response. But I will tell you that's exactly why we got the half a million dollars from Lumina and got people together who were coming up with definitions because the one group, the two student success groups, their whole goal is to come up with a definition for student success.

CHAIRMAN KEISER: Thank you so much.

MS. GELLMAN-DANLEY: Sure.

CHAIRMAN KEISER: Any other questions?

Well, thank you very much.

MEMBER ZARAGOZA: Arthur?

CHAIRMAN KEISER: Oh, Fred, I'm sorry.

MEMBER ZARAGOZA: That's okay.

CHAIRMAN KEISER: It's hard to see you there.

MEMBER ZARAGOZA: I know, I know.

CHAIRMAN KEISER: I'm blind so --
MEMBER ZARAGOZA: So I just want to follow up on the data integrity issue and, obviously, coming from a community college sector, I'm very sensitive to the limitations of IPEDS. Are there any promising data sources, any promising practices? Can you just speak to that a little bit, please?

MS. GELLMAN-DANLEY: Well, first, let's speak to the growth of data analytics. So if you take one of the community colleges that would show, the gentleman I called at a large community college who had less than ten percent, with the data analytics drilling down, it was more like 40 percent, and a very reliable group of folks were doing the data analytics. So that's one thing. So predictive analytics, all the kinds of things I mentioned, Arizona State. And the community colleges, in many ways, are really using that, some of them, the leading community colleges, those that want to get to where they need to be.

The second part of data sets is
exactly what our student success group is looking
at and our researchers because we were very
excited as a whole, C-RAC, that when we took into
account every type of student, the rates were
considerably higher.

    Now, that doesn't mean they're all
getting the jobs they want. I was pretty excited
about the article today about people with
humanities degrees actually can get jobs. So the
data analytics, predictive analytics is a big
part of it. And the excellent question that was
raised about the first point of contact with the
student is critically important and what we
gather, and it's more than ACCUPLACER.

    MS. JOHNSON-ODIM: May I just add one
thing, and that is that, just from the
perspective of my ten years on the board, in the
last three years, one of the things that I have
seen is a much more strict interpretation of
things. And by that I mean I think that there --
we have four levels of sanction for an
institution, and each of them takes some time or
can take some time. So things don't happen immediately, but I have certainly seen a number of sanctions that have been placed on institutions. Sometimes, you know, it may take two years.

So I certainly think that in the last three years, to this gentleman's question, that there has been movement, and I think that, as Barbara said, I can hardly make you understand how deeply the board takes this question of student success and part of student success is a graduation rate. So there is a lot of angst and a lot of hard decisions that go on, and sometimes it takes some time for them to be implemented.

MS. GELLMAN-DANLEY: And one final comment, Mr. Chair, if I may. There's nothing more gratifying than institutions that were devastated that we put them on probation that come back two years later and say thank you. It's not what I would have expected because, having been a president, I can't imagine thanking HLC for probation. But, basically, these
institutions have come back and brought extremely impressive data, and we are in the quality assurance, versus shutting institutions down, business as possible.

CHAIRMAN KEISER: Thank you very much. I hope I didn't miss anybody. We do have a third-party commenter.

You'll have three minutes, and, if you would, I will time you. And if you have -- please introduce yourself.

MS. FLORES: Good morning. Thank you to the Committee for allowing me to speak today. My name is Antoinette Flores, and I am a Senior Policy Analyst at the Center for American Progress.

I want to raise a concern for the public record of an ongoing trend around HLC not providing sufficient public warning about financial issues at its schools. In at least three instances over the past year, a college announced major changes as a result of severe financial problems catching students off guard.
In all three cases, HLC had the college on financial monitoring, but, unlike all of the agency's other actions, financial monitoring does not require the institution to disclose this information.

To be clear, HLC is doing a good job of monitoring finances at its colleges and taking action. My concern is that, by not requiring transparency, HLC is leaving its students in the lurch. In May 2017, students at Holy Cross College received an accidental reply-all email from an administrator revealing that the college was in severe financial trouble and at risk of closing. HLC had placed the college on financial monitoring in 2016. The college was not required to disclose this information, and so it didn't.

Also in May 2017, Northland College announced salary cuts to all faculty and staff, staff eliminations, benefit cuts, and ending some of its sports teams. HLC had placed the college on financial monitoring in 2016 and had issued various monitoring actions over the previous six
years. The college was not required to disclose this information, and so it didn't.

In probably the most severe instance, right before classes were set to begin in August 2017, Marygrove College announced it would eliminate its undergraduate program entirely at the end of the first semester. It was also placed on monitoring the year prior but was not required to disclose this information, and so it didn't.

If students don't find out a college is in a financial bind, they might get stuck. In this case, college enrolled students for the upcoming year. Students took out grants and loans to pay for it, and, at the last minute, the college pulled the rug. Nearly 70 percent of Marygrove's students are Pell recipients. Transfer is always difficult, let alone a rushed one in the middle of the year when cost is a big concern.

It doesn't have to be this way. Other agencies, like WASC, require a college to be
transparent in these cases. Public disclosure ensures an honest dialogue about a college's future and allows students the opportunity to make an informed decision about whether to enroll or to transfer from a college. Students deserve an open and honest conversation about the school where they choose to invest their money. Instead, some have gotten a process shrouded in secrecy. Thank you.

CHAIRMAN KEISER: Thank you. And thank you for recognizing the time limit. You were 2:48. That's very good. Anybody have any questions for Ms. Flores?

MEMBER BOEHME: So, Ms. Flores, and thank you so much for raising this concern. Can you just outline very specifically what your recommendation would be to HLC and not just compare it to WASC? What is the mandate, in your opinion?

MS. FLORES: Sure. The recommendation would be that HLC requires institutions to publicly disclose this information when a college
is on sanction because, in this case, it's in the institution's advantage but it's clearly to the detriment of students when they're deciding to enroll.

MEMBER BOEHME: And one more question. Other regional accredit, WASC is one. Are there any others that you know?

MS. FLORES: There are. I can't tell you off the top of my head. But looking over financial monitoring, there are other agencies that require institutions to publicly disclose when they're on monitoring.

CHAIRMAN KEISER: Thank you very much. I'll call the agency back, if they would like to respond.

MS. GELLMAN-DANLEY: Thank you. We appreciate the input and the opportunity to respond. In these cases, there were some other issues. It isn't just related to the financial. And there is a place on our website, if they were looking up the history of the institution. I hear what you're saying. There may be more in-
depth ways. That's possible to do that. But I will tell you, and I think it's important to point out, we do hold the administrators accountable for communication if there are a lot of leadership issues. And, yet, when they get back to their campus, we do get complaints that the administrators aren't being direct and candid and open with the students or potential future students.

We have a formal complaint process. I cannot recall any formal complaints that we got in these two issues at all. And if we got them and if we had heard from the students, we would have been glad to follow-up and respond. But I will say a lot of this, there's only so much accreditation can do, and if a president goes back and chooses not to communicate, if there's a monitoring concern or issue with their campus, we have to determine how far we should push on something like that.

CHAIRMAN KEISER: Thank you.

MEMBER ETCHEMENDY: So, Barbara, let
me see if I understand. So you, if you have an
action, you don't disclose it yourself, but you
expect the institution --

    MS. GELLMAN-DANLEY: Monitoring. No.
    MEMBER ETCHEMENDY: If you're
    monitoring.

    MS. GELLMAN-DANLEY: If it's the three
sanctions versus monitoring, there are public
disclosure notices that need to be on their site.
We absolutely tell them the language that it has
to be. If it's not there, I can just think of a
case very recently, we will get after the
institution. We check to make sure, and the
public disclosure notice needs to be on their
website in a retrievable place.

    These cases are monitoring cases. And
in those cases, it's on our website as far as
under the history of the institution, but it's
not listed the same way. We do encourage and
pretty much demand the presidents, you know, or
an appropriate group communicates with their
campus. We have had, but not in these cases Ms.
Flores mentioned, we have not had complaints, to my knowledge, about these institutions that would identify they haven't heard what's going on.

So, yes, we do with the sanctions. With the monitoring, you have to come to our website to look at the history.

MS. PETERSON: So if I might provide just a little bit more detail in the first case mentioned by Ms. Flores, it's a monitoring case on finances, so the information provided by the individual administrator in the email was not accurate. So I think we have that. It's very important to emphasize that.

But the fact that we had the institution on financial monitoring is on our website. It's publicly available. People can see that. Now, as to how much detail the institution itself should provide to the public about the nature of that financial monitoring, that's always tricky. Should, in fact, institutional president tell the financial, the community that an institution has an operating
deficiency. How the students and parents relate to that information? What do you do with that? So we leave the judgment of how much information about a financial monitoring issue is disclosed to the president to determine how much should be disclosed. But there is information on our website to the public about the fact that that financial monitoring is going on.

Now, the second case is different. That's a show cause case, a far more serious case. We have extensive information up on our website about that. The institution is required to disclose that. Again, I don't want to get into extensive detail about a case that's currently under review by the commission. That is under show case. They will be back in front of the board shortly, so what we say here obviously should be very limited.

But, again, these are two very different kinds of cases and there was extensive information provided on the second case, obviously, because of the serious nature and
disclosure requirements on the president in that case that were not the case in the first case where we're dealing simply with a financial monitoring case.

MEMBER WU: This discussion brings something to mind, which is I have the impression, based on news reports, that there may be dozens, even hundreds of decent but not well-endowed private non-profit institutions that are teetering on the brink financially. I think many people have that impression. And we don't want to start a vicious cycle where, because word gets out, they can't recruit a class and then they fall apart entirely. There's that risk because some of them might be able to come up with a plan.

But I wonder, and I would just offer you an opportunity to speak to this, should accreditor, should the regionals think about this impending crisis and should NACIQI be doing something? Because if -- and you've been nodding, I just want to make sure the transcript
shows that there's general agreement on this proposition that there may be many, many, many institutions out there that, not because they're bad, just because of the spiraling cost of our education, they're at risk of going under, going bankrupt. So should we be doing something about this? We meaning you, the regionals, and we NACIQI?

MS. GELLMAN-DANLEY: Well, certainly, part of your pilot project, when you look at all those data points, you certainly can discuss this. But let me speak as someone who's been a president of a small private rural institution, never claiming fiscal exigency or anything like that, but the first communication needs to be from the president to the staff. And as I think we all know, a lot of institutions, the president or CFO may keep the information a little bit tight, and that's a problem, and we encourage transparency on campuses.

The second thing, you said it so well. In the press, if they are doing an action plan to
get out of the trouble that they're in and they come public with this -- forget fiscal exigency, no one can say that word, it's kind of a kiss of death because if you say that everybody knows there's really a problem. But the communication with that changes for fundraising, it changes for enrollment, and all those kinds of things, and that's a dilemma that these institutions are up against.

I think it's going to take care of itself. They're going to close. There are institutions like this, unfortunately, that, even though they're the primary business -- because, you know, millions of dollars is a business regardless -- in their region, they may not make it and they may not make it because it's not a residential world anymore and their campus isn't enough or they can't compete with all the things that are being done on campuses, right, wrong, or indifferent, to be very, you know, sexy and attract students. It's a very threatened sector.

So I don't believe I have an answer
saying NACIQI should do something about it. I just can't say that. But I can say we are on top of all of these institutions. Yes, Karen?

MS. PETERSON: Let me add a little bit to that. I want to step back a little bit from the term crisis. I think that's perhaps maybe a little strong, not to disagree with your point but just to take it in a little different direction. Yes, there's no question that there are a number of institutions in the country who are struggling with the ongoing problem of enrollment, how do you bring students in, how do you get the bills paid? Because if you don't bring students in, then your operating revenues are not going to be where they need to be.

I've been in this business a long time, and I know this has been an ongoing struggle for some of our institutions. Some of them are able to pull it out one year after the next. It's not always easy. But having said that, in the past few years, we've seen a little bit of an uptick in the number of institutions
closing each year. We've gone from maybe a couple to about five. Now, that doesn't sound like a huge number, but, you know, if you add that up over the year, it starts to be a more significant number.

So I think it's something where accreditors are watching this very carefully. All of us are monitoring institutions that have financial challenges, moving them to a sanction where it appears that they are in some impending disaster mode. But I think we need to be careful to keep an eye on this. We don't want to suggest a sector of higher education is going to be dying any time soon because that sector still, there's a large number of students. It's still relatively viable. But a number of these institutions are looking for different ways of paying the bills, different approaches to bringing in students, different ways of partnering. And I think that's important for us to encourage where we can.

MS. GELLMAN-DANLEY: One of the things
we're doing, our board is working on putting out a thought paper at some point on financial sustainability. There have been a lot of really good things written about it by other organizations, but we'd like to talk about how do you know when your accreditation is at risk because of those kinds of things.

CHAIRMAN KEISER: Frank and then Simon.

MEMBER WU: I'll just say something very briefly for my fellow NACIQI members but for the regionals, as well, and for all who are here, which is I think we need to be mindful of this and watch this. We, NACIQI, spend a lot of time talking to you, agencies, about institutions who we think ought to go out of business and how do we address that. There also is a whole category of institutions we hope don't go out of business but face these challenges and for the public, for the students, for the communities, somebody ought to be watching this, and I think that somebody would be the agencies first and NACIQI afterward.
So I just want to note that we are watching, not just watching, we want to be constructive and positive and do something useful in the world here because if this accelerates a little bit more, so even at five closures per year for each regional -- is that, you're saying five --

MS. PETERSON: For HLC. I can't speak for the other regionals.

MEMBER WU: Right. So we could be looking at 25 or 30 across the country per year. That's not trivial when you look at the number of students and all the towns, etcetera. And if it just goes up a little bit, you know, this is worrisome because we're the authorities that should be responsible for doing something about this. I'm just noting, great that you're aware of this, we all ought to be thinking about this issue.

MS. GELLMAN-DANLEY: Yes. So one of the key triggers I would add is if we see draw-downs from endowment that exceed a certain amount, that institution is immediately flagged.
CHAIRMAN KEISER: Simon?

MEMBER BOEHME: I'll just be very brief. I think Ms. Flores brought up a great point, and it's good it sounds like you're coming up with a white paper. And I think in your opening remarks is, if we're going to be student-centric, talking about, as Frank so eloquently said, you know, not setting off this chaotic, you know, death sentence by actually being overly transparent, but it seems as though the example she cited, and you're right, they were different examples, but if they are impending, the students are owed that. And I just encourage the board certainly to continue talking about that. Thank you.

CHAIRMAN KEISER: Thank you. Any further questions? Elizabeth, would you come to make sure -- thank you very much.

MS. GELLMAN-DANLEY: Thank you.

MS. DAGGETT: I have nothing to add or to respond to the agency or the third-party comment.
CHAIRMAN KEISER: Thank you very much. Is there a motion from the two primary readers?

MEMBER PHILLIPS: Yes, we move to renew the agency's recognition for a period of five years.

MEMBER O'DONNELL: Second.

CHAIRMAN KEISER: Seconded by Rick O'Donnell. Are there further discussion? All those in favor of the motion, signify by raising your hand? All opposed? The motion passes. Thank you, Higher Learning Commission.

We're going to take a seven-minute break. Thank you.

(Whereupon, the foregoing matter went off the record at 10:17 a.m. and went back on the record at 10:32 a.m.)

CHAIRMAN KEISER: Welcome back. I guess I didn't stick to my seven minutes, but that's okay. Brian, would you please introduce yourself? Push your button.

MEMBER JONES: I'm Brian Jones, the President of Strayer University. And I apologize
for being late. I got caught up with kids and school delays today.

CHAIRMAN KEISER: Well, thank you Brian. We're now to move to the renewal of recognition of the New England Association of Schools and Colleges, Commission on Institutions of Higher Education, or we call it NEASC. The primary readers are Simon Boehme and Frank Wu, and I call Nicole Harris to the front to give us her report.

MEMBER BOEHME: Thank you, Chair. If it's okay, I'll offer a quick recommendation intro.

CHAIRMAN KEISER: That's fine. Sorry for missing that. Thank you.

MEMBER BOEHME: No problem. The New England Association of Schools and Colleges, Commission on Institutions of Higher Education, is a regional accreditor that currently accredits approximately 237 institutions in the six states of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. The
agency's accreditation is used by institutions in the region to establish eligibility to participate in the federal Title IV student financial aid assistant programs. The department received one complaint for the agency during this recognition period, which is discussed in the following criterion 602.16(a)(1), student complaints.

DR. HARRIS: Good morning, Mr. Chair, and members of the Committee. For the record, my name is Dr. Nicole S. Harris, and I will be presenting information regarding renewal petition submitted by the New England Association of Schools and Colleges, Commission on Institutions of Higher Education, also referred to as the agency.

The staff recommendation to the senior department official is to renew the agency's recognition for five years. The staff recommendation is based upon my review of the agency's renewal petition, additional information requested, complaint response, and supporting
documentation, as well as an observation of a site visit and commission meeting in October and November of 2017.

During the current accreditation cycle, the department received no third-party comments regarding the agency's renewal petition and one complaint in which the department reviewed and found no evidence that the agency did not follow its policies and procedures or failed to meet regulatory requirements.

Therefore, and as I stated previously, the staff recommendation to the senior department official is to renew the agency's recognition for five years, and there are agency representatives present today and will be happy to answer the Committee's questions.

This concludes my report. Thank you.

MEMBER BOEHME: I have just one brief question for you. If you could maybe give us a quick summary of what that complaint was.

DR. HARRIS: Absolutely. The complaint came in in June of 2014. The complaint
was from a parent of a student that was complaining about 602.18(c), which refers to decisions based on published standards. The parent felt that the agency did not review his child's complaint properly. The agency was requested to send information to the department in reference to this complaint. They sent us an outline and time line of all the documentation that was sent, which was numerous, and it was actually included in 602.16(a)(1)(9) with their documentation and the response from the department to the complainant. They outlined the time line. They addressed each concern listed in the complaint that was received by the department. And after the review of their documentation and our standards, the department found that the agency did not have, did not have any reason to not -- I'm sorry. Let me rephrase that. The department did not find them non-compliant with their policies and procedures and their decisions.

MEMBER BOEHME: So in your opinion,
they did handle it correctly?

DR. HARRIS: Absolutely. And this is just, you know, it may strike you as an odd question and maybe you don't know, but under the narrative for, you know, when we use this online system and we can look at specific provisions that either the accreditor does not meet or they meet, and I've never seen within their narrative an accreditor that did not meet at the first go-around except, like, three times. Is that common? I mean, I'm not an old soul of NACIQI where that's, I've only been here, you know, four or five years, but is that common?

PARTICIPANT: It did not meet?

MEMBER BOEHME: The standard in their narrative.

DR. HARRIS: Did not meet which standard?

MEMBER BOEHME: Almost all of them except three.

DR. HARRIS: Oh, oh, okay. That issue was, the does not meet was provided because the
focus review, in the documentation that we send out to the agencies for review, if sections are not, if nothing has changed, they're to put an attestation and then we'll verify the documentation. They instead put not applicable, so I found them non-compliant in every section except for three --

MEMBER BOEHME: Okay. Right, okay.

DR. HARRIS: -- because it wasn't applicable.

MEMBER BOEHME: That makes sense.

DR. HARRIS: But Herman can speak to it, as well.

MEMBER BOEHME: Sure.

CHAIRMAN KEISER: Herman, would you please?

MR. BOUNDS: Yes, I just wanted to comment about that issue. Since we started the focus review, we've had a lot of agencies that will forget about the attestation language and then a lot of agencies will forget about the multiple sets of documentation needed. So
nowadays you might see an agency that has a multitude of does not meets initially, but it's easily corrected easily when they provide that additional information.

MEMBER BOEHME: Yes, I did not see anything negative against the accreditor, but it was unlike things that I have seen previously. I'm just curious for what that was, so I appreciate your clarity around that.

DR. HARRIS: No problem.

CHAIRMAN KEISER: Yes, Bobbie?

MEMBER DERLIN: And this is probably for Herman, not specifically for you, Dr. Harris, because I had a similar observation. This is a well-established accreditor, so it seemed odd that the initial was all not met. And I got the part about the attestation needing to be in a particular way, but it also appeared that there was some documentation in terms of, and I may have this wrong, folks, so forgive me, but three years of self-study review that went from the self study all the way through the board
decision, and it seemed like that documentation was missing in some cases.

Do we consistently request that the form of the documentation from the agencies? I just wanted to check this. It seemed weird.

MR. BOUNDS: Sure we have. Since we started the focus review, I believe, in, like, 2015, we've required that additional information. The problem here is that a lot of agencies, when they were last reviewed, they were not reviewed under the focus review, so it's a new requirement for them. And what we want to do -- and it's not all criteria. Some criteria, we really need to see the full cycle of the agency's review, you know, the self study, we want to make sure the site visit report reflects the issues in the self study, if there were any, and then the final commission decision. We want to track that for one agency, I mean, excuse me, for one institution in that institutional decision. So that's why you'll see in a lot of the agencies they'll have a lot of deficiencies in the draft,
but the draft is supposed to be that way. I mean, we want to get as much information as we can. You know, most people say, wow, they're clean, but you got to look at the draft, and we ask for a lot of information in the draft.

MEMBER DERLIN: Thanks. And I appreciate that that process of interaction is an important part of the process.

CHAIRMAN KEISER: Thank you. If I may call the agency to appear. Would you please come on up and introduce yourselves?

MS. BRITTINGHAM: Hi, good morning. I'm Barbara Brittingham, and I'm President of the Commission on Institutions of Higher Education for the New England Association of Schools and Colleges. And with me is my colleague, Patricia O'Brien, who is our Senior Vice President.

I bring apologies from David Quigley, our vice chair who is Provost and Dean of the Faculties at Boston College who was not able to meet with us due to a scheduling conflict. He had hoped to be here if we were scheduled on
another day and could not come today.

I want to take this opportunity to thank Herman Bounds and Jennifer Hong for all their support and guidance through the process and particularly thank Dr. Nicole Harris who observed a visit and provided us some useful feedback, observed a commission meeting, and I think that was really helpful. Our commissioners get regular updates about this process, but having Dr. Harris with us made it personal and real, and we appreciate her time and attention. She also has an extraordinary eye for detail, and this process helps us always, I think, improve and make sure that we are operating within the federal requirements. We had a policy that is related to an institution not getting good news, and so our staff had reviewed it very carefully, the commission had reviewed it and approved it, and any institution who gets that policy I can assure you approved it. And when Dr. Harris looked at it she found an ambiguity in it that no one else had found, so we appreciate that, and we
were able to make the corrections.

I want to speak a little bit about the accreditor dashboard and then how our institutions looks at success with respect to student achievement.

If you look at the accreditor dashboard that was just revised, the 2018 version, I think, when I see it, I think those dashboard indicators reflect New England. I see relatively high net price, which is reflective of the New England region which, historically, has had many independent schools and a longstanding lack of high level of support from states. So even though we've seen some additional state dis-investment, that level of support in New England has never been particularly high.

We also see relatively low loan default rates. Fifty-two percent of our institutions have three-year default rates at or below five percent. We see relatively high graduation rates. These are for first-time full-time students only, and we're pleased to note
that institutions in the green zones on that indicator increased from 68 last year to 77 this year.

We also see relatively high salaries. New England is, in fact, a relatively expensive place to live, and we were pleased to note that institutions in the red zone on this indicator decreased this year from 30 last year to 24 this year. Along with our institutions, of course, we would like to see these indicators even more positive.

What are we doing to look at graduation debt and repayment? Well, first of all, for about ten years now, our Commission has had what we call Data First forms, and we call them Data First because we want to encourage institutions to begin their self-study process by looking at the data and talking about it. These forms are used as a comprehensive evaluation and in interim reports and at certain other reports that the commission may ask for.

The Data First forms relate to each of
the standards, but, with respect to graduation
debt and repayment, they include four years of
data on debt for students at all degree levels
leaving before or after they earn a degree. They
include four years of data on retention and
graduation for first-time full-time, first-time
part-time, non-first-time full-time, and non-
first-time part-time students. So retention and
graduation rates for all degree levels and
progression of degree levels the institution
entered or another institution that is transfer
rates.

Our commission, for about ten years,
has monitored institutions with high loan default
rates. We currently ask for reports from
institutions that have cohort default rates
higher than 20 percent for one year or over 15
percent for three years in a row. We've averaged
five institutions a year, and this year we
reviewed two institutions.

We have a special report from the
institution, a committee that's convened that
makes recommendations to the commission. They will go to the March meeting. One of the things that we have learned there is that many institutions are increasingly working with loan default prevention services, and many institutions have also wished that they could provide more financial counseling to students. And I think that is a topic that will come up in re-authorization.

I will note that when the commission asks to report about loan default rates, I think that, by itself, is a message and encourages institutions to pay additional attention to loan defaults.

Next year, we will have a similar program to look at loan repayment, noting that only 17 of our over 200 institutions participating in Title IV have repayment rates below the national median. Next year, we'll look at institutions that have long repayment rates below 40 percent using a similar process.

One other thing our commission has
done is update the preface page. This is the page that goes at the beginning of the team report. And in our relatively small region, institutions that have comprehensive evaluations or focused evaluations come before the commission the semester after they're visited. The president and the team chair are present and often the board chair.

The preface page now includes information on retention and graduation rates at each degree level, three-year cohort default rates for the three-year most recent year, three-year loan repayment rates for the three most recent years, the average percent of students leaving with debt at each degree level, and the average amount of debt for graduates at each degree level.

Finally, over this past year, we've instituted a new workshop to help students use the data in their self studies and interim reports and build the habit within their institutions and capacity in their institutions
to make looking at these data a part of their regular process.

I want to talk about how our commission looks at success with respect to student achievement. Our commission reviews and revises its standards for accreditation every ten years with a mid-course correction at the fifth year. The current standards were adopted in 2016, in January, and went into effect July 1st of that year.

The overarching statement about student success is the statement of the standard for Standard 8, educational effectiveness, which says the institution demonstrates its effectiveness by ensuring satisfactory levels of student achievement on mission appropriate student outcomes. Based on verifiable information, the institution understands what students have gained as a result of their education and has useful evidence about the success of its recent graduates. This information is used for planning and improvement,
resource allocation, and to inform the public about the institution. Student achievement is at a level appropriate for the degree awarded.

This broad language applies to all of our candidate and accredited institutions, a rather extraordinary array including the Berklee College of Music, Rhode Island School of Design, the Naval War College and the Coast Guard Academy, Northern Maine Community College and Bunker Hill Community College, Amherst College and Williams College, the Conway School of Landscape Design and the Vermont Law School, Rhode Island College and the University of Maine at Fort Kent, Yale University and Massachusetts Institute of Technology, Hartford Seminary and Eastern Nazarene College, College of the Atlantic and Maine College of Health Professions, Massachusetts Maritime College, and Wellesley College, Southern New Hampshire University and the University of New Hampshire, Urban College of Boston and Vermont Technical College. This wonderful and extraordinary range of missions
indicates that, while student success is important throughout higher education, no simple means of measuring or ensuring it will work.

Our commission considers evidence of student success in three broad categories. First is retention progression and graduation rates, and I'll talk more about that in a minute. The second is assessment of student learning outcomes, a faculty-driven exercise based on the stated learning outcomes for courses, programs, and institutions. And third is other quantitative measures of student success based on the institutional mission.

Regarding retention progression and graduation rates, our commission participated in the C-RAC project that looked at institutions with low traditional graduation rates. That is for first-time full-time students. We looked at two-year institutions with three-year graduation rates at or below 15 percent and four-year institutions with six-year graduation rates at or below 25 percent. That trigger identified 28
institutions. Each of these institutions was asked to write a seven-page report, and it's amazing how much information you can get into seven pages if you actually have something to say.

The institutions were asked to address four questions: one, are the data correct; two, what else do you know about your students' progression toward a degree; three, what are you doing to help your students move toward earning a degree and what do you know about how successful it is; and, four, what else are you planning to do?

We convened a committee, including two commissioners, to review these reports and make recommendations to the commission. While I'd be happy to talk about what else we learned, the commission ultimately took action that placed the 28 institutions into four broad categories. One, three institutions produced reports that were problematic in that they did not persuade the commission that they had a good understanding of
the issues, a full understanding of the data, and/or a persuasive set of responses to help students move forward. These institutions have additional monitoring based on this review. Two, seven institutions were asked to add information about retention and graduation rates to their next report. Three, seven other institutions had an upcoming report where they were already asked to address issues of retention and graduation. And, four, 11 institutions submitted particularly strong reports representing a good understanding of the data, appropriate efforts on their way to help students, a good understanding of their success, and realistic plans for the future. The commission looks forward to hearing an update in the next scheduled report.

These institutions have undertaken a multitude of efforts to support student progression. These include targeted institutional research to identify student groups most at risk, enhanced and required orientation, changes to class scheduling, initiation of food
pantries, improved advising, and small emergency grants for contingencies such as car repair.

We noticed that institutions that participated in collective efforts such as Achieving the Dream and the Voluntary Framework for Accountability found support and learned new ideas from the peers in these projects.

Recently, we reviewed updated information that is data from this year on the same measures that we acted on last year. And of the 28 institutions identified last year, we were pleased to note that six of them came off the list. Five institutions had the same rate this year, four had lower rates, and twelve had slightly higher rates, no higher than, usually one or two-percent higher. One institution had too full-time students to calculate a rate.

Only one institution was added, so we were pleased that six came off and only one was added. Our commission will review a report from that institution at its meeting in April and consider what to do next in regard to this
As noted above, our commission also considers student achievement as assessed by the faculty on the course program and institutional outcomes. While some institutions use external assessors, in general, these efforts are highly local. Our commission supports and expects the efforts and is principally interested in whether they lead to improvements in the academic program and services for students.

The third to mention considering student success is other quantitative measures of student achievement. These vary greatly by institutions and their mission. For some community colleges, for example, a measure of success can be progression to a four-year institution before or after earning an associate's degree. For other institutions, license or passage rates, employment data, going on to graduate school, gaining fellowships, or earning recognition as a musician or an artist are important outcomes of student success.
Our commission uses the Data First forms that provide a framework for these measures, as well as retention and graduation rates. The forms are used by every institution at the time of the comprehensive evaluation and the interim report and at the request of the institution by some through progress reports and focused evaluations.

Does the commission take action on these matters? Indeed, it does. Others have recognized regional accreditation for its role in articulating and maintaining focus on student learning outcomes. Institutions are regularly asked to address these issues in follow-up reports, progress reports, focused evaluations. In some instances, the commission has taken an action that results in my meeting with the president and board leadership to express the commission's concern about the institution not demonstrating it is paying sufficient attention to student success.

What is the most difficult area in
this realm? For us, I would say it is institutions having sufficient information about the success of their recent graduates. Many institutions work hard to get this information through surveys, phone contacts, social media, and other means. Our institutions want to know about the success of their recent graduates, and it's not always easy for them to find out. I'm not here to take a position on the unit record system but do note the challenges for institutions that want to know how their students are doing later and getting reasonably useful information.

What will the commission do going forward? I do not come before you with an exact plan, but, that said, the commission understands the important role it plays in addressing these matters. Last month, our commission had a special retreat, and one of the concluding observations reflected the importance going forward of accreditation having the public trust in the quality of higher education.
Our commission recognizes that accreditation's contribution to public confidence depends significantly on students earning a degree that will provide them with good opportunities for economic success, as well as the other benefits that come with a good college education.

Going forward, we look forward to investing in the improving use of data by the commission and by our institutions and believe that increased interest in competency-based education in particular will help focus institutions to make more sharply-worded claims about the achievement of their students and ensure robust assessment.

Thank you very much.

CHAIRMAN KEISER: Thank you. Primary readers, do you have questions?

MEMBER BOEHME: Great. Well, thank you so much for your presentation. It seems as though I don't need to ask the pilot questions because you went point by point, and I certainly
enjoyed that.

And although there are a few questions within the pilot which I think the committee may find helpful that you elaborate on is, what favorable monitoring and adverse actions were taken?

I know you touched on I believe it was three schools that provided insufficient responses to the seven-page report that you requested. But maybe if you could just speak more broadly in terms of the monitoring and the adverse actions and comment if the seven-page report, because of graduation rates, is that a separate kind of monitoring? Is that a new kind of monitoring?

MS. BRITTINGHAM: That was a new kind of monitoring that Barbara Gellman-Danley, who was at this table a little bit ago, talked about how each of the regional accreditors approached this project differently, which I think gives us an opportunity to explore the best ways to take a look at this. And one of the interesting
outcomes of the C-RAC project was that our findings were all consistent, regardless of how we came at this project.

But the seven-page report was a new level of monitoring, again, because the -- most of the institutions, nearly all of them have a scheduled opportunity ahead, either one that was added or one that was already on the books, to report back about retention and graduation rates. And the Commission will continue to monitor this.

We have one more institution this year, and then we'll figure out, what have we learned here and what are we going to do going forward?

MEMBER BOEHME: Did you take any adverse action since the last time you've come in front of NACIQI?

MS. BRITTINGHAM: In general, we have -- there is one institution that is on probation, and that institution will come before the Commission this spring at the end of the probation period. We have one institution, and
in fact Dr. Harris was at the -- at that Commission meeting -- that was asked to show cause, and the Commission information presented during the show cause hearing was not complete. The Commission didn't feel it had all the information it needed to make a decision, and so it will be coming back in April.

MEMBER BOEHME: And when we look at graduation rates as a benchmark, and looking at definitions going to the Chair's question with HLC, does New England have a definition that it applies for graduation rates?

MS. BRITTINGHAM: New England uses the federal definition rates, but also on our Data First forms it invites institutions to look at additional rates. So some institutions look at retention and graduation for first generation students or for Pell recipients or for students at a remote location or in distance education.

So some institutions will disaggregate the student population, and in fact in our 2016 standards, in the standard on students and on the
standard on educational effectiveness, the Commission says if you -- basically, if you have more than one student body, you need to report on each of them separately.

And the poster child for that is Southern New Hampshire University, which has an on-campus residential student body. It has some remote locations that take the same program but without living on campus. It has a distance education program, and it has the direct assessment program. So it really has -- and graduate students.

But for the undergraduate students, there really are four different populations, and the Commission wants to know how each one of them is doing.

MEMBER BOEHME: Great. And in terms of the two schools that you have on heightened cash monitoring level 2, can you provide just a quick update with what's going on with -- are they coming in front of you in April, or where are they?
MS. BRITTINGHAM: Yes, I can. One of them is -- is going to have a visit very soon about a number of activities, so the Commission will see that. After the visit, they will be in the following semester. The second institution is -- it has a religious mission, and that institution is in the process of being combined with an institution in another region from the same church group.

MEMBER BOEHME: Would you describe the health of your region?

MS. BRITTINGHAM: The region is challenged, I would say. We have a lot of -- we have a healthy number of what I call household name institutions that are doing well. We also have a number of small, independent colleges. We have had some close. We have some in motion right now that are combining.

There is a general prediction that there will be more of that. And while our Commission has traditionally spent more time with independent institutions than with public
institutions, recently we have been -- the Commission has been spending increasing amounts of time with public institutions because of the financial challenges and the demographic challenges. And I can talk more about that if you want.

CHAIRMAN KEISER: Frank?

MEMBER WU: Could I follow up on that? So what thoughts do you have about what regionals -- not just yourself but other regionals should be doing? And what should NACIQI be doing? Because I have the sense, and others seem to as well, and you just said you predict this, too, that there will be a non-trivial number of both public and private institutions that will face solvency issues.

That is, they may well go out of business. Some might be able to turn it around. Others might merge, for example. But others will go out of business, and some of that might be precipitous and harmful to the public, the communities, and, most importantly, to the
students and families.

MS. BRITTINGHAM: Right.

MEMBER WU: So is there -- should we be getting out in front of this? And help us think through what -- what, in particular, should NACIQI be doing about this? Should we ask every regional, and so on? Because --

MS. BRITTINGHAM: I think asking is good. I'm not sure what NACIQI should be doing, but I can tell you a little bit more about what our Commission is doing.

Our Commission has a retreat every June, and a couple of years ago we had somebody come in and talk to us about what we should be expecting teams to do with governing boards, and what the Commission should be doing with governing boards.

And I mentioned that the president comes in to me after a visit, and from time to time the Commission will ask the governing board chair to come along, or the president will bring the governing board chair. My takeaway from that
retreat session was that the Commission should more frequently be asking governing boards how -- at what point would they decide that they needed to give serious consideration to merging or closing.

And, in fact, I have had that conversation with two or three institutions since that. I think it is a -- I think it's something that the Commission can helpfully do.

We've had some public institutions merge. Two colleges in Vermont -- Johnson State College and Lyndon State College merged. They declined the opportunity to become Lyndon-Johnson State College, and are instead Northern Vermont University.

We have had -- the University of Maine system has seven publicly -- I'm sorry, seven separately accredited institutions, and the smallest one has become a regional campus of the flagship. There is a proposal on the table in Connecticut to combine 12 community colleges into a single community college, and that will come to
our Commission in April.

One of the things our Commission has added in the last few years is what we call an advisory opinion, and in both the cases of Maine, and in a larger sense than just the one combination, and in the case of Connecticut, the Commission has invited the system and some of the presidents in and given them an opportunity to say, "This is what we're thinking about" to the Commission, and asking the Commission for feedback, so that they don't go too far down the path and then have the Commission say no, nobody wants that.

So I think that has been a useful means of having a conversation with systems. We had a meeting of our system heads at the annual meeting and asked them if they wanted to get together again and they do, and so we're hosting them at our office in May. So we are working more closely with state systems.

MEMBER WU: Thanks. That gives me a sense. And you started by saying you don't think
there is anything for this body to do, other than
to inquire about this of agencies.

    MS. BRITTINGHAM: Yes.

    MEMBER WU: And just to keep it in our
minds.

    MS. BRITTINGHAM: I think so.

    CHAIRMAN KEISER: I have Bobbie and
then Claude.

    MEMBER DERLIN: Hi. One of the issues
that emerges with heightened monitoring, more
activities through your Data First initiatives,
is that these activities, while valuable, can
place a certain amount of stress on institutions
in meeting the requirements. And you did also
mention that access to data is sometimes a
challenge for some of the institutions.

    Could you speak a little bit about
what your Commission's procedures are to acquire
feedback from institutions about how this --
these new directions are influencing them.

    MS. BRITTINGHAM: Thank you. I
mentioned our Commission had a retreat in early
January, and one of the things that we did in preparation for the retreat is to have actually a former Commission chair contact the accreditation liaison officer at 10 or 12 -- 12 institutions, a whole range of institutions that had recently been through a comprehensive evaluation to ask them for feedback about each step of the process.

And it is true that some institutions struggle to come up with the data, and so one of the things that we'll be doing is looking at our Data First forms and making sure that we're not asking for data that are not going to be useful.

And also, I think our efforts to help have that information be useful to institutions not only in the accreditation process but to develop that habit of looking at data mitigates it, because if -- if institutions see this as only for accreditation, then it could become a burden. Whereas, if it's something that they find value in looking at over time, then it's worth it.

MEMBER DERLIN: Thank you.
MEMBER PRESSNELL: Thank you for coming. Appreciate it very, very much. I want to follow up on Frank's comments. You know, I think accrediting agencies are uniquely positioned to -- from your vantage point to view potential closures, obviously. They are -- and also to understand other institutions of similar mission and type that might be candidates for mergers or, you know, some type of a consolidation or collaboration.

I'm an association head. I've got 34 universities. And I don't know nearly what SEC-COC knows about those institutions. And I have one institution that is closing and announced their closure this last spring. And it was a bit of a surprise to the association because we weren't privy to the financial situation.

So, you know, I would highly recommend that the institutional accreditors really think through that whole issue and whether or not you might be in a position to offer suggestions. I'm not saying being prescriptive, but to allow
institutions -- because typically when institutions start a death spiral they get so narrowly focused and myopic about how do we solve it internally that they don't see opportunities outside of themselves. And so I just want to mention that as an encouragement.

And the other thing I -- I have a question on is in light of some of what we're seeing, and in a way I wish I would have asked HLC, is that is there anything we need to do more robustly as accreditors on teach-outs and the closure thing.

The institution and my membership that is closing is -- actually, they put together I think a -- well, they put together a two-and-a-half-year plan of closure, which I don't think is sustainable. I don't think they can do that.

Once you announce it, students are going to appropriately make provision to transfer to the institutions assisting them that way.

But do you have any comments on the teach-out piece and whether or not we should do
something more, rethink it or improve it?

MS. BRITTINGHAM: Thank you. That's a great question. And our Commission, at certain points, has asked institutions for teach-out plans. And they are, frankly, of varying quality, and they are short of teach-out agreements, which institutions are reluctant to go after because that is such an obvious signal to institutions that are often their competitors, that they are, you know, on the verge of closing. So it's very difficult.

One of the mergers that we're seeing in Boston is Wheelock College merging with Boston University. Wheelock College was not under any particular watch from the Commission. It was under regular review, but they could look ahead and see that they did not want to get to the point where no one would want them. My words, not necessarily theirs.

And so they have what I'm told, both by the people at Wheelock and the people at Boston University, a very smooth and successful
plan for the integration. They happen to be very close geographically. I think it's harder for institutions that are remote to figure out what to do, because they don't have somebody right down the street that they can merge with, and that makes it more difficult.

I think in Simon's question the institution that is part of a religious group, that institution is in another region altogether that basically is going to take over this institution. So the circumstances differ. We have the advantage of not -- you know, we have a reasonable number of institutions, and we have the advantage of a small geographic footprint.

And so it's pretty easy for us to go see institutions or for them to come see us. And we've had institutions come in in pairs saying that they are thinking about merging, and we talk about, you know, how can we help them. And we can refer them to other people who have gone through this to try to be helpful to them, but it's a difficult issue and one we continue to
think about.

    MEMBER PRESSNELL: One other question, and it's one, really, I asked earlier as well. As a committee, we're trying to be sensitive to the deregulation call. And you saw that, you know, your colleagues in HLC have the open pathway, WASC has also an option there, too. Do you have, or are you considering, any type of risk-informed or risk-managed approach to accreditation?

    MS. BRITTINGHAM: This is another topic that our Commission talked about at its retreat, and I think the language -- I'll use the language that they use. They didn't want a system that would be perceived as tracking. What they are interested in is a tailored approach for every institution, and that's a high-touch process, and I think we do some of that. But I think it's something that we can do more of.

    I think it's a topic for the Higher Education Act to clarify the boundaries of what accreditors can do. I know we've had some
guidance from the Department, but it's still -- I have to say, it's not entirely clear to me what the flexibility is there.

MEMBER BOEHME: Do you have any institutions that have a single-digit graduation rate by the metrics that you use?

MS. BRITTINGHAM: I think we do. Pat is going to find out.

MEMBER BOEHME: Thank you.

MS. BRITTINGHAM: One of the things that we -- while she's looking at that, one of the things that we found and are encouraging institutions to use is the student achievement measures, SAM -- you're familiar with that -- which really puts together such a vivid display, so that you can see how far beyond the simple first-time/full-time it goes.

Do you want to --

MS. O'BRIEN: Yes. There's one institution that the IPEDS graduation rate is three percent. It's an institution that serves adult students, just about all of whom attend
part-time. And so it's a very, very small cohort, evidently not quite so small that it couldn't be reported, but that would be one example.

There is another -- please.

MS. BRITTINGHAM: Yes. That institution also -- I've talked to the president, and one of the things that she said was that they have a federal grant that -- and I don't -- I'm sorry, I don't remember the name of it, but the purpose of the grant was to bring in students to an institution that was accustomed to dealing with first generation, low income students, to give them a year of work and with the idea that they would transfer.

So I think that's partly affecting that rate.

MEMBER BOEHME: Thank you.

CHAIRMAN KEISER: Sensing no more questions, thank you very much. There are no third-party commenters? No.

I will call -- if you would return to
your seats, I'll have the staff come back and respond to any comments or concerns.

DR. HARRIS: I have no additional comments.

CHAIRMAN KEISER: Hearing no additional comments, I'd entertain a motion from the primary readers.

MEMBER BOEHME: I'll make a motion to renew the agency's recognition for five years.

CHAIRMAN KEISER: There is a motion on the floor. Is there a second?

MEMBER WU: I'll second.

CHAIRMAN KEISER: Frank Wu has seconded. Now time for discussion. No discussion.

Well, I'll call -- since I sense no discussion, all in favor of the motion, signify by raising your hand? All opposed? The motion carries.

We are early. Would you like to take a longer lunch, or would you like to move on to the next one? Are you here, are you ready to
join us? Moving forward in front of our
timeline. That's phenomenal.

Chuck, you are the first -- well, let me look at the two presenters. Ralph and
Federico, would either of you like to tee up the discussion?

MEMBER ZARAGOZA: Mr. Chairman, committee members, guests, the Accreditation
Commission for Education in Nursing, ACEN, formerly the National League for Nursing
Accrediting Commission, is the national programmatic accrediting agency for postsecondary
and higher degree nursing education programs.

Its current scope of recognition is the accreditation of nursing education programs
in schools, both postsecondary and higher degrees, which offer a certificate, diploma, or
recognized professional degree, including clinical doctorate, master's, bachelor's,
associate's, diploma, and practical nursing programs in the United States and its territories, including those offered via distance
education.

The agency accreditation is a required element, enabling some of its practical nursing and all of its hospital-based programs to establish eligibility to participate in Title 4 programs.

The National League for Nursing, precursor to the Accreditation Commission for Education in Nursing, was first recognized as the national accrediting agency in 1952 for the accreditation of associate, bachelor's, and higher degree nursing education programs.

Its scope was later expanded to include diploma and practical nursing programs. The agency was reviewed by NACIQI at its December 2006 meeting, and the agency was granted a five-year period of recognition. In June of 2000—and -- I'm sorry, I lost my place.

In June 2000, the agency again appeared before NACIQI for an expansion of scope, to include distance education, and was granted the request. At the NACIQI 2012 agency meeting,
the agency requested its scope to include accreditation for clinical doctorate education programs, and was, again, granted that request.

At the NACIQI June 2014 meeting, ACEN's report was incomplete. However, NACIQI granted an extension of its recognition for good cause for a period of six months and required the agency to submit a report demonstrating its compliance with the separate and independent requirements, and to revise its bylaws to be compliant with the secretary's separate and independent definition 602.14(b).

The NACIQI reviewed ACEN's compliance report in June 2015 and found ACEN to be non-compliant with the separate, independent requirements.

At this point, I will defer to the staff for their analysis, recommendations, and comments on ACEN's current status and its compliance with the separate and independent requirements.

CHAIRMAN KEISER: Chuck?
MR. MULA: Good morning, Mr. Chair, members of the committee, for the record, my name is Chuck Mula, and I will be presenting a brief summary of the petition for continued recognition by the Accreditation Commission for Education in Nursing, hereinafter referred to as the Commission or the Agency.

As part of the evaluation of its current petition, Department staff reviewed the Commission's petition and supporting documentation and attended a Commission decision meeting in October 2017. There are no third-party comments in connection with the petition, and no active complaints being reviewed by the Department.

The Commission last appeared before the NACIQI in December 2015 when at that time it demonstrated its compliance with the secretary's separate and independent requirements. And I will go into this after the initial comments.

Our review of the agency's petition found that it is in compliance with the
secretary's criteria for recognition. The Department has no concerns, and its recommendation to the senior department official is to renew the agency's recognition for five years.

That concludes my report. The agency representatives are also here, and we'll answer any questions that you might have.

To address the separate and independent requirements issue, the agency basically was an accrediting commission at one time, a part -- and part of the National League of Nursing's professional body, which is a professional membership association.

It came after a long period of time, successful operation under that agency. The Department was aware of issues that concerned the -- an influence by the association into the accrediting commission's operational and financial issues, or health, basically.

At one time, the agency was requested by the Department to actually rewrite its bylaws
with the cooperation of the association to come into compliance and to separate itself from those association functions that were causing concern for the Department.

That brought about a strain in a relationship between the two organizations. The association then -- and the Accrediting Commission then separated, had different bylaws developed, and spent a lot of time in court.

The time that we gave the agency good cause extension is based on that time that they were not allowed to comply with our requirements because of the issues of the legal actions that were being taken, and the time it took for them to satisfy the legal actions, and then prepare to satisfy our requirements.

Eventually, the agency did separate officially from the association. The association still has -- they officially legally are still part of that association, but the association no longer has any operational or financial relationship or control of the resources of the
Accrediting Commission.

So it is now under its own bylaws, and it is under its own operation, and it maintains its own financial and operational standards and is completely compliant with the secretary's requirements.

CHAIRMAN KEISER: Thank you, Chuck. Are there any questions from the primary readers? Ralph? Federico?

MEMBER ZARAGOZA: Yes. Again, I want to commend both Chuck and the agency for their extensive work, as evidenced in the report. I do have three quick questions. One, on the area of student achievement, I understand that you have an established an 80 percent licensure pass rate as a target for your students. But you also have job placement as a target, Chuck, so I wanted to see -- my understanding was that the target for job placement is set by the faculty, and that in fact it varies by location.

MR. MULA: This question is probably better answered by the agency. Our review
process, the secretary's criteria is very specific when it comes to what we can actually -- how far in the weeds we can get.

Herman, if you want to say something about that. But I think the agency would be able to do more to help --

MEMBER ZARAGOZA: Chuck, and I'll wait for that. That's fine.

CHAIRMAN KEISER: Okay. Well, thank you, Chuck. If I may call the agency to come forward. And would you please introduce yourselves.

MS. McJANNETT: Good morning. Thank you for welcoming us here today. My name is Cathy McJannett, and I'm chair for the Board of Commissioners for ACEN. I have been with ACEN for a number of years, and it is my pleasure to serve as the chair.

I'm a diploma nurse from the beginning and spent my nursing career not only working at the bedside but also as a nurse administrator at a community college, and just recently retired
and am now working as adjunct faculty, plus remaining at the bedside as well. So my life is very full with that.

I'd like to introduce you to Dr. Marsal Stoll. And Marcy is our CEO. She holds undergraduate and graduate degrees in nursing, as well as a doctorate in educational administration.

She began her nursing career almost at the bottom of the career ladder as a practical nurse and became a registered nurse, served as part-time and full-time faculty teaching in associate degree programs as well as college administration and as well as SAX COC. We were so thrilled in 2014 that she joined ACEN at that time.

Dr. Sharon Beasley, to my right, is the associate director of ACEN. Dr. Beasley has been a registered nurse for 20 years, nurse educator for over 12 years before joining us at ACEN in 2015. During her tenure at the Technical College of Lowcountry in South Carolina, she
served in many capacities, including educator, administrator, and working with strategic planning. Brain cramp on that word.

We'd like to express our appreciation to Mr. Mula for all his support in our recognition petition. His knowledge of regulations was clearly evident, and his guidance proved invaluable during this process.

We are extremely proud of ACEN and the work it has done over the years for nursing education, and ACEN is committed to our mission of supporting the interests of nursing education, nursing practice, and the public by functions of accreditation.

The purpose of ACEN is to provide specialized education for all types of nursing programs, including the clinical doctorate, the doctorate of nursing practice, specialist certificate, master's and post-master's certificate, baccalaureate, associate, diploma, and practical nursing programs. We're all-inclusive.
The ACEN accredits nursing programs in secondary, postsecondary, and hospital-based governing organizations that offer certificates, diplomas, and degrees. As the leading authority in nursing accreditation, the goal of ACEN is to strengthen the quality of nursing education, both nationwide and internationally.

Our belief is that specialized accreditation contributes to the centrality of nursing for the public good and provides for the maintenance and enhancement of educational qualities through continuous self-assessment, planning, and improvement.

Currently, we accredit nursing education programs located in the United States, in the U.S. territories, and internationally. Some of our international programs are located in Scotland, Saudi Arabia, Oman, Turkey, Jordan. We have a number of both domestic and international programs seeking accreditation.

Another strength that I -- people I work very closely with are the members of the
Board of Commissioners. We have nine nurse educators, we have three nurse clinicians, and we have three public members that serve on the board. Our breadth and depth of the issues in regards to nursing, the nursing profession, nursing education, and higher education serves -- that provides a foundation for the accreditation and policy decisions.

Our staff, as evidenced by Dr. Beasley and all that work in our office, really enhance our ability to serve these ACEN-accredited programs.

I thank you for your time, and I'll ask Dr. Stoll to take over.

MS. STOLL: Thank you. The ACEN accredits over 1,200 nursing education programs throughout the United States, U.S. territories, and internationally. During 2017, the ACEN board took 377 accreditation actions. Of the 377 accreditation actions, 128 programs were granted eight years' continuing accreditation or five years' initial accreditation.
Forty-nine programs were placed on conditions for non-compliance with one or two standards for ACEN's six accreditation standards. One program was placed on warning for non-compliance with three or more standards out of ACEN's six accreditation standards. Seven programs were placed on good cause for continued non-compliance with any accreditation standard.

No programs were denied initial or continuing accreditation. However, a program can withdraw from the process before the ACEN Board of Commissioners makes an accreditation decision, and I will discuss this shortly.

Data shows that ACEN's Standard 6 assessment outcomes is the primary standard that causes non-compliance followed by standard four curriculum. Of the 1,200 ACEN-accredited programs, ACEN serves as the Title 4 gatekeeper for 59 institutions. These 59 institutions represent ACEN-accredited practical programs in postsecondary, adult education settings, and ACEN-accredited practical, diploma, and associate
programs in hospital-based settings.

The accreditor dashboard reports ACEN data for 34 institutions. Based on the accreditor dashboard, 48 percent of the enrolled students in these 34 institutions receive Pell grants. Based on the accreditor dashboard, approximately 77 percent of the enrolled students in these 34 institutions receive federal loans.

Based on the accreditor dashboard for these 34 institutions, the Title 4 student aid volume is approximately $30 million. And according to the USDE federal student aid default management website, for the ACEN 59 institutions that ACEN serves as the Title 4 gatekeeper, 52 institutions had a reported default rate.

The seven institutions without a default rate was due either, one, to no data being reported by the Department; or, two, the Department reported fewer or 10 borrowers, and, therefore, data was unavailable.

Based on the federal student aid default management website for fiscal year 2014,
the most recent information that is available, the institutional default rate for the 52 programs that ACEN serves as a Title 4 gatekeeper ranged from zero percent to 20 percent.

Nine institutions had a zero percent default rate. Sixteen institutions had a default rate between one and 4.9 percent. Sixteen institutions had a default rate between five and 9.9 percent. Ten institutions had a default rate between 10 and 15 percent. And one had a default rate of 20 percent. We calculated the average institutional default rate for these 52 institutions to be 5.7 percent.

Regarding program outcomes, through our annual report process, the ACEN-accredited programs report the licensure pass rate, their certification pass rate for the graduate level programs, completion rate, and job placement rate.

Licensure pass rate for undergraduate program, based on the 2017 -- 2013 standards and criteria was the program’s three-year mean for
licensure pass rate will be at or above the national mean for the same three-year period. That changed, and in the 2017 standards and criteria it is now the most recent annual licensure pass rate will be at least 80 percent for all first-time test-takers during the same 12-month period. This change occurred after our normal process of reviewing standards and criteria.

The ACEN-accredited programs report their NCLEX's pass rate from July 1 of one year to June 30th of the next year. The National Council of State Boards of Nursing, otherwise known as the NCSBN, the organization that administers the licensure examination, reports their pass rate data on a calendar year, January 1 to December 31st.

A review of our annual report data demonstrates that the mean licensure pass rate for registered nursing and practical nursing graduates exceeds the NCSBN published national pass rate mean.
Based on our data from July 1 of '15 to June 30 of '16, the most recent published data, compared to the published data from NCSBN, ACEN-accredited practical programs had an average pass rate that was seven percent higher than the national mean.

ACEN-accredited diploma programs had an average pass rate that was four percent higher than the national mean. ACEN-accredited associate programs had an average pass rate that was six percent higher than the national mean. And ACEN-accredited baccalaureate programs had an average pass rate that was the same as the national mean.

In fact, the NCSBN, just this week, released a study comparing the licensure pass rate of accredited pre-licensure RN programs in the United States to unaccredited pre-licensure RN programs. And the NCSBN found that the first time NCLEC's pass rate for graduates of a pre-license accredited RN program was significantly higher, at 87 percent, compared to unaccredited
programs, which was 72 percent.

For the 59 institutions for which ACEN serves as the Title 4 gatekeeper, the reported licensure pass rate from July 1, '15, to June 30 of '16, ranged from 61 percent to 100 percent, and the average was 91 percent. Ten programs reported a 100 percent pass rate, 26 programs reported a pass rate between 90 and 99 percent, 19 programs reported a pass rate between 80 and 89 percent, and three programs reported a pass rate between 60 and 79 percent.

Graduate programs take certification exams. The ACEN criterion for certification pass rate in the 2013 standards was the program's three-year mean for the certification exam pass rate will be at or above the national mean for the same three-year period. And in the 2017 standards and criteria that changed to the most recent annual certification pass rate will be at least 80 percent for all first-time test-takers during the same 12-month period. And, again, this change occurred as a result of the review of
the standards and criteria.

ACEN-accredited programs report pass rates for certification exams taken by graduates of gradual level programs. As a variety of certifying agencies offer certification exams for various nurse specialties, a comparison with any reference group is not recommended. However, historically reported certification pass rates have been 90 percent or greater for ACEN-accredited programs.

Regarding completion, the expected level of achievement for program completion is determined by the faculty and reflects program demographics. The ACEN definition for the completion rate is the percentage of students who graduate within 150 percent of the stated nursing program length, beginning with the enrollment on the first day of the first nursing course.

The reported average completion rate for all 1,200-plus ACEN-accredited programs from July 1, '15, to June 30, '16, ranged from 71 percent to 84 percent. For the 59 institutions
for which ACEN serves as the Title 4 gatekeeper, 
the average completion rate for these programs 
during the same reporting period was 71 percent. 

Regarding job placement, the ACEN 
criterion for job placement rate in the 13 
criteria was expected levels of achievement are 
determined by the faculty and are addressed 
through quantified measures six to 12 months 
post-graduation.

The 2017 standards and criteria now is 
the expected level of achievement for job 
placement is determined by the faculty and 
reflects program demographics. The ACEN 
definition for job placement is the percentage of 
graduates employed in a position for which the 
nursing program prepared them.

The reported average job placement 
rate for all 1,200-plus ACEN-accredited programs 
from July 1, '15, to June 30, '16, ranged from 91 
percent to 98 percent. Data analysis suggests 
that some programs have lower job placement rates 
due to graduates continuing their education
rather than seeking employment.

For example, a practical nursing graduate immediately enrolls in a registered nursing program rather than seeking employment. In this case, the program is encouraged to have a separate outcome addressing academic progression.

Another factor impacting job placement rates is the hiring practice of employers in a variety of health care organizations, which may influence the type of graduates preferred for entry level positions. Health care organizations may choose to hire fewer graduates from a specific program type, for example, an associate graduate versus a baccalaureate degree graduate.

Practical nursing programs continue to report the lowest mean job placement rate, although still a very robust 91 percent employment. And clinical doctorate programs report the highest mean job placement rate of 98 percent.

The job placement rate for graduates of all program types from July 1, '15, to July 1
-- June 30th of '16, showed an increased job placement rate of one to six percent over the last reporting period, with diploma programs having the highest increase at six percent. For the 59 institutions for which the ACEN serves as the Title 4 gatekeeper, the average job placement rate for these programs during the same reporting period is 90 percent.

If a program fails to meet any of the effectiveness benchmarks for student achievement, the ACEN requires the program to provide a detailed action plan regarding how the program intends to improve, so the program can meet the effectiveness benchmark. We then review the program's progress toward meeting any unmet effectiveness benchmarks, typically on an annual basis.

Programs not meeting an effectiveness benchmark could be placed in non-compliance with ACEN Standard 6 outcomes, placed on a compliance timeframe as required by the Department and ACEN policy, and monitored by the board.
The assessment outcomes can be a challenge for some programs. Knowing this, the recent revision of the ACEN standards and criteria resulted in the streamlining of Standard 6, intentionally focusing only on the assessment of the end-of-program student learning outcomes.

What is an end-of-program student learning outcome? In other words, at the end of the program, the graduate is able to do. So it is the practice-ready behaviors graduates are expected to demonstrate, the practice-ready knowledge graduates are expected to comprehend, and the practice-ready skills graduates are expected to perform, and the three already fore-mentioned program outcomes of licensure or certification pass rate, completion rate, and job placement rate.

The revised standards became effective 1 January 2017, and early observations reveal faculty members' improved understanding of outcomes assessment as well as effective ways of assessing outcomes, purposeful data analysis, and
intentional use of analysis of data to drive decisions that improve the program and students achieving their educational goals.

We believe the change to Standard 6 will make ACEN programs even better and stronger programs.

Finally, we will address the activities to improve programs and quality -- institutional quality. Programs on conditions -- remember, that's non-compliance with one or two out of the six standards; on warning, three or more of the standards; or good cause, continued non-compliance with any of the standards, are monitored as required by the Department and ACEN policy and are considered at-risk programs.

All programs, especially at-risk programs, have access to supportive services from the ACEN. I will briefly describe some.

The candidacy process. As part of the candidacy process, the nursing program has an assigned member of the ACEN professional staff who mentors the program faculty and guides them
through candidacy and initial accreditation.

We know the mentoring process works. For programs that completed the candidacy process and pursued initial accreditation, in 2016, 44 of 45 programs were granted initial accreditation. And, in 2017, 39 of 39 programs were granted initial accreditation.

While we know the mentoring process works, some programs chose not to complete the candidacy process, and, therefore, did not seek initial accreditation. In 2015, 25 programs did not complete the process. In 2016, 17 programs did not complete the process. And in 2017, 21 programs did not complete the process.

I don't know if these programs that did not seek initial accreditation would or would not have been granted initial accreditation. Please apply your best judgment.

Another services advisory review. The purpose of the advisory review is to assist an ACEN-accredited program to prepare for continuing accreditation. An advisory review is a one-time
opportunity for an ACEN-accredited program to seek feedback from an ACEN professional staff member regarding draft accreditation documents selected by the program faculty and nurse administrator.

For example, a draft of their self-study report, draft of their systematic plan, faculty profile table, et cetera, as the program prepares for continuing accreditation.

An advisory review is 100 percent optional and is not a requirement for continuing accreditation. Professional staff feedback indicates the staff member's best judgment and does not guarantee that the Board of Commissioners will determine that the program is compliant with the ACEN standards and criteria.

An observer on a site visit team -- a nursing program beginning initial or continuing accreditation may designate one person to accompany the peers on a site visit team to observe and learn from the site visit team activities and the review process experienced by
the host program.

Self-study forums. Self-study forums provide attendees with the opportunity to gain a deeper understanding of the standards and criteria, the self-study process, as well as guidance on writing their self-study report.

Program administrator workshop. Assist novice or advanced beginner program administrators who are leading ACEN-accredited programs. Information related to accreditation policies, processes, maintaining compliance, is provided.

There is an abundance of online resources on the ACEN website, such as the accreditation manual, standards and criteria, guidelines, instructions, templates, training, et cetera, and the most important resource, the ACEN professional staff.

The professional staff are experienced nurse educators who are committed to helping programs navigate the ACEN accreditation process. The professional staff also provide what I brand
as intrusive advisement, especially for at-risk programs. It is about getting at the heart of what is causing the non-compliance.

The ACEN professional staff member facilitates the program faculty to diagnose the problems and find appropriate solutions. Our intrusive advisement is an action-oriented, proactive approach to involve and motivate the program faculty, to seek help from the professional staff when needed.

It is not handholding, but, rather, active concern for a nursing program being successful in the ACEN accreditation process. And it is a willingness to assist the program faculty to be successful, especially the at-risk programs.

Do these tools work? Well, I have already mentioned the candidacy process. While most of the other supportive services are new, we do know that in 2016 the ACEN Board of Commissioners granted 63 programs continuing accreditation and removed them from conditions.
Ten programs were removed from warning, and two programs were removed from good cause.

For 2017 to date, 66 programs were granted continuing accreditation and removed from conditions, 10 removed from warning, and six removed from good cause.

CHAIRMAN KEISER: Dr. Stoll, if you could wrap it up.

MS. STOLL: I am.

CHAIRMAN KEISER: Thank you.

MS. STOLL: As I previously stated, a program may withdraw before the board makes an accreditation decision, but in 2016 one program was denied initial accreditation and no programs were denied continuing.

Of the programs reviewed, in '16 four programs that started the accreditation process withdraw before the board made a decision. In 2017 to date, one program has -- that started the process has withdrawn. However, the 2017 process will conclude in March of 2018.

I am done with my remarks, and thank
CHAIRMAN KEISER: I thought you had read your whole petition.

MS. STOLL: No. Just trying to hit all your questions.

CHAIRMAN KEISER: You certainly did.

Primary readers, questions?

MEMBER ZARAGOZA: Well, thank you for confirming that you indeed have established procedures to ensure that the placement bar set by faculty for job placement is at an appropriate level, and I understand that to be 91 to 96 percent. So very, very impressive.

In reviewing your website, I noted you have around 70 institutions that have voluntarily withdrawn from the ACEN accreditation process since 2015. Can you explain what is going on? Is it a short-term phenomena or market correction, or what is going on?

MS. STOLL: So some of the programs that have withdrawn have -- for a variety of reasons they could have closed. We're seeing a
diminishing number of diploma programs, for example, throughout the United States. Some programs have been at the practical program level. Again, some of them have been related to closings.

As you are aware, there is another nursing accrediting agency, CCNE, and there is a little bit of swirling that happens between our two organizations. So for a variety of reasons, either closings or administrative capacity, sometimes finances, programs do voluntarily withdraw.

MEMBER ZARAGOZA: Thank you. And then my last question is, again, on the dashboard, you've identified two institutions that are in heightened cash monitoring. Any updates on that?

MS. STOLL: No, sir. I don't have any updates on that.

MEMBER ZARAGOZA: Thank you.

CHAIRMAN KEISER: Ralph?

MEMBER WOLFF: Yes. Thank you for your thorough presentation. It answered some of
my questions about the -- how you got to the 80 percent.

I do have a question about the eight-year term that you provide. Is the only -- either you get eight years or you are on conditions, or are there those that will get less than eight years without conditions? Is it a sliding scale? Could you describe -- partly, it's in relationship to our later conversation about risk.

MS. STOLL: Okay. So for continuing accreditation, it is done in, for lack of better characterization, eight-year chunks. So a program could be found in compliance with all of the standards and criteria and granted continuing accreditation for eight years. And then they do the annual report where we do monitoring on select variables, such as the program outcomes that I discussed.

A program -- all programs are done in eight-year cycles. So if a program is found non-compliant with one or two standards, they are
placed on conditions for a maximum of two year, if it's a diploma or a degree program; 18 months for a practical program. The program is expected to come into compliance within that timeframe.

And at the end of that timeframe, as I indicated, a vast majority of our programs do come into compliance at the end of the 18 or the 24 months. Some even come into compliance sooner because the board has the discretion of doing up to 24 months but less than 24 months. Has been granted in certain circumstances.

So if a program comes off of conditions at the end of two years, then they are back up for a full reaccreditation in six.

MEMBER WOLFF: That makes sense. Thank you. I did just want to follow up on the, too, cash monitoring. Are you advised when a program has -- is under heightened cash monitoring? And do you then -- does that trigger a particular review on your part?

MS. STOLL: Okay. So as I indicated, we have a relationship with 1,200-plus programs.
All of our programs, the institution that they are part of must hold institutional accreditation. So for 11 -- almost, well, 1,150 programs, if we can just do easy numbers, an institutional accreditor, such as a regional accreditor or a national -- national accreditor, is actually the Title 4 gatekeeper, and they have primary responsibility for that.

That said, the ACEN does monitor the Title 4 status for all of our programs. And so part of our subchange process includes that any issues with the Department of Ed are brought to our attention. We ask for, how is the institution addressing the issue, even though we're at the programmatic level, because that could potentially impact the nursing students, and we care about that. And so we do pay attention to what is happening at the institutional level.

For our 59 programs where we are the Title 4 gatekeeper, then we do very much pay attention to what is going on with the U.S.
Department of Ed and the program's relationship with the Department of Ed, and then handle it appropriately as an institutional accreditor would.

MEMBER WOLFF: You mentioned at least one of your loan -- one of the 59 had a loan default rate of 20 percent.

MS. STOLL: Yes, sir.

MEMBER WOLFF: And I assume that you would be monitoring that and working out with them to --

MS. STOLL: Yes, sir.

MEMBER WOLFF: -- as a gatekeeper.

MS. STOLL: Yes. We are paying attention to that. It's a practical program in rural Pennsylvania, and there is socioeconomic issues and other things of such nature that are going on in that situation.

One other question. As you talked about the variability, or at least the range, for completion and placement, depending on how the -- at least for completion you have the 80 percent
rate, but you did identify that there are some
below the 80 percent, and they would be on
conditions, I assume, or -- but --

MS. STOLL: As I indicated, the
expected level of achievement is set by the
faculty for completion. And they have to provide
a rationale for their expected level of
completion.

That rationale could be that they are
looking at themselves and looking at the trend of
their completion rate. They could benchmark it
against their institution. They can benchmark it
against a peer group. They can benchmark it
against the ACEN data.

They have options that they can make
a rationale for why their completion rate is. In
some circumstances, a state could set a
completion rate. For example, in the State of
Alabama, there is a set completion rate that the
state imposes.

So they have to provide that
rationale. They are expected to meet their
expected level of achievement. If they don't meet their expected level of achievement, then we ask what is going on, why is it going on, what are you doing about it, how are you trying to improve, and we will monitor the situation.

It could potentially result in a program placed on some kind of sanctions, such as conditions or warning.

MEMBER WOLFF: Thank you.

CHAIRMAN KEISER: Steve, Frank, and then I'll have a question.

MEMBER VAN AUSDLE: Well, for a moment, I want to speak as a representative of a demographic that cares deeply about what you're doing in providing qualified nurses for us, and in adequate numbers. And when you look at projections, it is showing a significant shortage of nurses into the future.

I'd be interested in your perspective on, yes, I have been a president of an institution that you have accredited. I know the rigor. What are those two or three things that
makes it difficult for an institution to expand a
program because of your rigorous requirements
that I also appreciate? In other words, can you
help with the educational attainment of nurses in
our country, as well as the quality?

MS. McJANNETT: As a recently retired
college administrator of nursing, I would love to
answer that. I'm from California. The biggest
roadblock for nursing -- and I run into this
every day of my job -- was the facilities not
taking students. We could take more into the
classroom. We absolutely could.

But the fiscal component of the
college, not being able to provide us what we
needed to get these students to the level to
operate really well in a clinical setting, you
know, those sim labs cost millions of dollars, so
as nurse administrators our weekend evenings are
spent writing grants.

But that's a big part. But if we
could get the hospital systems to accept the
students into clinical -- I come from community
college. Nursing can't survive without community colleges. They just can't. But the hospitals are saying, especially in my region -- I'm sure, what I understand from ACEN, all over -- is they don't want associate degree nurses.

So when you're looking at completion, my students -- I've got an agreement with one of the universities, four of them actually, where the students almost are doing concurrent bachelor's programs. And so when they graduate, it makes my completion rate -- or my job placement rate look really terrible because I can't count them as having jobs, because they go immediately into a bachelor's program.

So if we could get hospitals to work collectively as we go through this career path, it would be wonderful. But it's money and the health care systems.

Sharon, did you have anything to --

CHAIRMAN KEISER: Frank?

MEMBER VAN AUSDLE: Excuse me. One of the insights might be that transfers should be
valued just as highly as graduation from an associate program.

MS. McJANNETT: Absolutely.

MS. STOLL: And that's why we encourage programs where they have what appears to be a low job placement rate but a high academic progression rate to have a second outcome, so they're accounting for that positive place. Because a student continuing his or her education is a positive outcome, and so we do have programs that track both -- their job placement as well as academic progression.

CHAIRMAN KEISER: Frank?

MEMBER WU: Congratulations on resolving your legal matters. I just wanted to ask, now that that's over, and I infer since there are no third-party comments that the parent group that you still have some ties with, that we're all good at this point.

Could you help us with a post mortem? Because this did take many years, and specifically could NACIQI have facilitated a more
expeditious outcome, or did we -- and I'm not fishing for a compliment here. I'm just trying to figure out, what was it that finally resolved this? Was it that the Department of Ed actually would have shut you down?

Because I think your exact scenario isn't going to arise again, but I'm just wondering, what sort of carrots and sticks can we work with? So you're good now. So now you can look back and say whatever you want. Should we have been tougher, easier? Because I'm guessing you did not enjoy being in the court system for years and years and years.

MS. McJANNETT: I was here the longest. So no.

MS. STOLL: And I entered the story line about the crisis moment. The Department has a process, and the Department followed its process, of follow up and monitoring, and then ultimately saying, you know what? There's no more time left on the clock.

And so it was the recommendation from
Department staff and NACIQI of not continuing our recognition that brought the parties to the table that resulted in this positive outcome.

Since we were re-recognized not that long ago, that's why we're right back here. It took us three-and-a-half out of five years to resolve the situation. But, nonetheless, it has been a very positive outcome for the profession of nursing, as well as for the nursing programs.

We are still a wholly-owned subsidiary of the National League of Nursing. We are located in Atlanta, Georgia. We are separately incorporated. We are completely separate and independent administratively and financially.

The League is located here in Washington, D.C. They are doing their thing; we're doing our thing. And we're both in our own ways serving the profession of nursing and nursing education.

MEMBER WU: This is just a brief comment for this body. This suggests that it's not a bad thing to use the tools that are
available to us where there are these odd situations that arise, that might actually bring about a good resolution, because three-and-a-half years in federal and state court is probably not a desirable process to go through for anyone. So just a note.

MS. STOLL: And the Department did its job. That's simply what happened.

CHAIRMAN KEISER: Let me ask a question, and then you can go, Bobbie. I have a question, yes. I said I would take the next question.

Anyway, I applaud you on having a definition of "completion." However, you do require in your associate degree programs general education prerequisites and part of the program, yet you don't count your completion data until they begin the actual core nursing programs.

What about all those other students who never got to the core as in some -- in many community colleges that frontload the academics?

MS. STOLL: There are so many
iterations of ways colleges and universities put any kind of academic program together, including nursing programs. When I taught, we had a four-semester program, GenEd was integrated throughout the four semesters, there were co-reqs and prereqs as part of the nursing program, and it truly was a two-year, four-semester program.

Other colleges and universities frontload their GenEd requirements and backload their nursing. At the end of the day, we know that for -- using associate degree programs as the example, that the minimum number of credit hours typically is 60 credits and ranges to 72 credits. The average number of credits is 70.

How colleges and universities cobble all that together is at the college's or university's discretion.

CHAIRMAN KEISER: I understand that, but it doesn't really answer my question, which is, is your completion rate an actual accurate termination of what the completion rate is when, if it is academics or frontloaded, and they are
not included in the calculation?

MS. BEASLEY: I think I understand what you are asking. However, our definition is applicable to all programs, all program types. And because of what Marcy just mentioned, there are so many iterations, so many variations, in how programs implement programs of study.

And to kind of make sure that we're able to track completion rate where we can report the rates and use the data in a meaningful way, our definition starts with the first nursing course. And I understand where you're going with that.

CHAIRMAN KEISER: Wouldn't it be more accurate for those students who enroll in a nursing program but don't take their nursing programs until the back part of the course, that if they drop out up in the front that those are non-completers, and they will -- you know, it basically kind of softens the impact of the drops that are part of the academic program? Even though it's required.
MS. McJANNETT: If I could just make a comment about that. When students are -- at the community college level, when students are going through their GenEd, which is a requirement for most community colleges that I am aware of, they make career changes along the -- career path changes along the way.

For the students that come into the nursing programs, at least in California, most of us have set criteria. And when we're looking at their GenEds and different things, the Board of Nursing's are the ones that say, "This is how many units, and this is how many semesters it takes." And the GenEds are counted. They are counted by our boards of nursing when we do that.

And if you have students that come into the program looking at ACEN, most of us they are counted within that process, because they are first-time takers of their anatomy, physiology, micro. I mean, they have to be -- and get good grades to get into the nursing program, and to be able to track who decides not to get into that
because they failed.

    We don't even know that they really want to get into nursing until they get to the very end of that. So it would be very challenging to look at, I think.

    MS. BEASLEY: Yes. And one other thing to emphasize is the number of students who transfer from other colleges and universities, community colleges, to other nursing programs. And so so many students -- you're raising your hand, the finger? I have a minute? Oh, okay. All right.

    So many students transfer general education credits toward their nursing degree and nursing program. So that's something else.

    MS. STOLL: And most baccalaureates, your first two years are GenEds, and your nursing is your junior and senior year. And some students aren't even nursing students until they're juniors.

    And so to have consistency around all of the different iterations in the way any kind
of academic program is put together, let alone nursing, that's why we have the definition that we have.

CHAIRMAN KEISER: It just seems to me like kind of a cherry-picking kind of situation where you take the best students who don't get through the General Ed and then they begin the program, even though when they enrolled as freshman they -- they were enrolling as a nursing student. But that's neither here nor there.

Any other questions? Bobbie, then Claude, and then Frank.

MEMBER DERLIN: I just want to join the chorus. Thank you for your persistence and being here and doing all this work over time. You talked about some of the supportive services you offer to program personnel as they are pursuing their accreditation with you.

And I think you mentioned something about institutional personnel participating as observers of peer review teams, and I would be interested in hearing a bit more. I know some of
these things are new. Have you actually had experience with that? And how does that work?

MS. BEASLEY: Okay. I can --

MS. STOLL: Sharon coordinates it, so go for it.

MS. BEASLEY: So the observer experience on site visit teams is relatively new. And in the fall, we actually had one person who observed. The observers have to go through peer evaluator training. Observers are responsible for all cost and fees, including lodging, travel, associated with the visit.

They do sign a confidentiality form as well. They are privy to the discussions that the site visit team has with the faculty, the students, the staff, the college administrators. They attend the public meeting. They attend the tours of the clinical agencies. So they are basically there observing everything that's going on.

They sit in the evidence room. They look through documents. They are not able to ask
any questions or interfere in any way with the review process. So they are basically a fly on the wall.

And the comments that I received from the one observer from the fall, she attended one of our self-study forums in April of last year. And so she considered that to be the course per se, and then she observed in the fall on a site visit team. And she thought that was more of the capstone. It kind of placed the icing on the cake. It gave her a better understanding of what to expect as the nurse administrator.

It also provided her with some ideas and some shortcomings from her program's perspective, and some things that she could implement that would help for her site visit, which is actually scheduled this spring. So very positive feedback.

MEMBER DERLIN: So if I'm an observer, I'm going to some other school's team.

MS. BEASLEY: One school, yes.

MEMBER DERLIN: And --
MS. STOLL: You get to shadow the team that is there evaluating the program.

MEMBER DERLIN: I just don't get to speak.

MS. BEASLEY: You do not get to speak.

MEMBER DERLIN: That would be very difficult for me.

(Laughter.)

MEMBER DERLIN: Thank you very much.

MS. STOLL: Thank you. Thank you.

MEMBER PRESSNELL: Just real quick, the -- I am going to sound like a bit of a broken record today, because I am -- I really am trying to explore risk-informed approaches to accreditation, and we definition would like to see programmatic accreditors be -- you know, to do the same.

Have you considered such an approach looking at institutions so that -- well, have you considered such an approach of risk-informed accreditation model?

MS. STOLL: I'm sorry. Could you
repeat your question one more time? Have we considered what?

MEMBER PRESSNELL: A risk-informed approach on your accreditation. So you heard the regional accrediting bodies grapple with that a little bit. And the regionals are making some progress on that. We're hoping that programmatic accreditors are going the same or thinking -- at least thinking about it. Have you had some thought about that?

MS. STOLL: I have given it thought. We don't do what we heard described this morning. I would argue that in a way we do take a risk kind of approach in that when a program is found non-compliant, they are placed on conditions, they are placed on warning. I know it's not exactly the same thing.

When we go through our subchange process, things are leveled based on how significant a change might be. It could be a non-issue; we don't even need to look at it. It could be something that's a letter of
notification. It could result in a prospectus that is reviewed and approved on paper, or it could result in now a visit that is being triggered as a result of some change that is so significant that we need to go in and take a look at the program for continued compliance with the standards and criteria based on that new thing that the program is doing, such as implementing distance education or implementing a new off-campus instructional site.

So, at this point, that's about what we're doing, but not what we heard this morning. We have not had that type of conversation at our Commission yet, no.

CHAIRMAN KEISER: Frank? Simon?

MEMBER WU: So this is a question for our chair, for staff, and also I think a little bit for Claude, who has been heading this effort for us to do some policy work. We have heard from just about every agency about some deficiencies in IPEDS and in the other data, in particular about transfers, which are good.
Typically, transfers, that's a good thing, we want to see it, but not just transfers, people who go on to some other program. Also a good thing, but it shows up in the data. Both of those show up as bad.

So for our chair and for staff, and for Claude, can we in some document someplace articulate this, so that somebody -- because we are not in a position to change that, but we are in a position to note this and agitate and highlight it and say, "Hey, this needs to be changed because institutions are being hurt when they're doing something good and we're getting data that's not quite right. It doesn't reflect the reality." So --

CHAIRMAN KEISER: Frank, you know, we're going to have --

MEMBER WU: -- can you say something about this?

CHAIRMAN KEISER: We're going to have two separate opportunities to address that and discuss it. One is tomorrow when we're talking
about data; and, two, when Claude presents his report that we can amend or address other issues that might or may not be in Claude's subcommittee's report. So --

MEMBER WU: Great. I'll save it for then, because I'm also looking for things where we have consensus. And this is something where I don't think there's anybody on the other side for good reason, which is this is just a discrepancy. This is just something wrong. It's fixable. And no one is, you know, paying attention to fixing it. So I'll raise it twice. Thank you.

CHAIRMAN KEISER: Simon?

MEMBER BOEHME: Yes. My question will be quick. I noticed on the dashboard that you had two schools that had a completion rate below 20 percent, and you commented a little bit earlier in your answering the pilot questions, and I also appreciate your thorough review. But can you just speak a little bit more specifically about what you're doing to address those programs that have completion of the 57 -- only looking at
the 57 schools at your Title 4 -- in charge of, what exactly are you doing with those two schools? Or if there are more than two schools, what kind of monitoring probation are they on?

MS. STOLL: Okay. Off the top of my head, I can't even tell you which two schools they are. But I can tell you what we do when a program doesn't meet its ELA, whether we are or are not the Title 4 gatekeeper. Programs report data annually. That's one data point that we collect.

We review the data in the office, by the office staff. And if there is something that needs follow up, the nurse administrator will receive a letter from us asking, what are you doing about it? How are you trying to fix the problem? Et cetera, et cetera.

We receive that report back into the office. If it is a satisfactory response, we continue to monitor the situation. Sometimes we have to go back and ask some questions until we get a satisfactory response, but we will continue
to monitor the situation until the program has met its level of achievement, has come up with some other alternative approach perhaps, but, nonetheless, it could potentially result in a program ultimately hosting a focused visit, having peers come, talking with the kind of boots on the ground, find out what is going on more on a one-on-one basis, and then that focused visit report goes to the Board of Commissioners.

The Board of Commissioners could ultimately make a decision to place the program on conditions or warning, depending upon what circumstances are, and then we'd let the process proceed.

MEMBER BOEHME: And that has not happened that often, because it strikes me, as many of your programs do, quite well.

MS. STOLL: Related to job placement and completion, no. Related to pass rate, yes.

MEMBER BOEHME: Okay. Thank you.

CHAIRMAN KEISER: Any further questions? Well, thank you very much. If you'd
step by, and we'll let -- bring back Mr. Mula.

MR. MULA: I have no additional comments, Mr. Chairman.

CHAIRMAN KEISER: Thank you, Chuck.

Is there a motion from the -- one of the two --

MEMBER WOLFF: To renew for a period of five years.

CHAIRMAN KEISER: Motion by Dr. Wolff, and seconded by Dr. Zaragoza. Any further discussion? Sensing none, all those in favor of the motion, please raise your hand. All those opposed? Well, we are pretty unanimous today. Very good.

We are now -- we'll adjourn for lunch until 1:30. So we will see you back at 1:30 sharp.

(Whereupon, the above-entitled matter recessed for lunch at 12:21 p.m.)

CHAIRMAN KEISER: We have two more agencies to review today, and potentially a third, depending on how fast we get through this
process. We are now at the renewal of recognition for the Accreditation Commission for Midwifery Education, or ACME.

Our primary readers are Kathleen Sullivan Alioto, who is not here today, but Claude Pressnell is here. Claude, do you have an introduction?

MEMBER PRESSNELL: I do. Thank you, Mr. Chairman. So ACME serves as the autonomous body within the American College of Nurse Midwives with respect to the development, review, evaluation, and administration of all policies and procedures related to the accreditation programs offering the midwifery education.

ACNM is the professional association for certified nurse midwives in the United States and its territories. ACME conducts ACNM's accrediting activities and currently accredits 39 programs located in 25 states, the District of Columbia, and Puerto Rico.

Accreditation by ACME provides eligibility for participation in various funding
programs offered by the U.S. Department of Health and Human Services, including its advanced education and nursing trainee-ship program, and its National Health Service core scholarship.

The staff has found -- I think there is still one outstanding finding, 602.20, the enforcement of standards, which states that if the institution or program does not bring itself into compliance within a specific period, the agency must take immediate steps -- immediate adverse action, unless the agency for good cause extends the period for achieving compliance.

So I'd like to turn it over to the staff.

MS. McKISSIC: Good afternoon, Mr. Chair, and members of the committee. For the record, my name is Stephanie McKissic, and I will be presenting information regarding the renewal petition submitted by the Accreditation Commission for Midwifery Education, also referred to as ACME or the agency.

The staff recommendation to the senior
Department official is to continue the agency's current recognition and to require it to come into compliance within 12 months and submit a compliance report 30 days after the 12-month period that demonstrates the agency's compliance with the issue below.

The staff recommendation is based upon my review of the agency's renewal petition and supporting documentation, as well as observation of an ACME Board of Commissioners meeting in May 2017 and a site visit in Springfield, Massachusetts, in October 2017.

The Department did not receive any third-party comments or complaints during the current accreditation cycle. Based upon the review of the response to the draft analysis, supporting documentation, a site visit observation, and follow-up communication with the agency, Department staff has identified one remaining issue, which has been included in the final staff analysis report.

In particular, the agency must provide
documentation and implementation of a standard defining terms of good cause and systematic procedures for monitoring a program's progress toward compliance for 602.20(b) enforcement standards.

Therefore, as previously stated, the staff recommendation to the senior Department official is to continue the agency's current recognition and require it to come into compliance within 12 months and submit a compliance report 30 days after the 12-month period to demonstrate the agency's compliance.

There are agency representatives present today, and we will be happy to answer the committee's questions at this time.

Thank you.

CHAIRMAN KEISER: Claude, do you have any questions of staff?

MEMBER PRESSNELL: Not at this time.

Thank you.

CHAIRMAN KEISER: Thank you. Members of the agency, would you please come forward and
identify yourselves?

MR. JOHNSON: Good afternoon, and thank you to Stephanie for all the support that you provided us through the process. My name is Peter Johnson, and I'm pleased to serve as chairperson of the Accreditation Commission for Midwifery Education, which I think has been stated is also known as ACME.

With me today on my left is Anne Cockerham, one of our Commissioners at large, and at the other end of the table, Ronald Hunt, who is our public member Commissioner, and next to me is Heather Maurer, our executive director.

The U.S. Department of Education has recognized ACME as a programmatic accrediting agency since 1982. Our mission is to advance excellence in midwifery education, and we are here, as was said, seeking continued recognition.

ACME's work in ensuring high-quality midwifery education is crucial to tackling one of the most significant health problems in the United States -- the shortage of maternal health
care providers. Every year in the United States one million babies are born to mothers who did not receive adequate prenatal care.

The national shortage of providers of primary reproductive and obstetrical health for women continues to rise, as does the female population. The American College of Obstetricians and Gynecologists, ACOG, reports that currently 49 percent of U.S. countries do not have obstetrical care providers, and they project a 25 percent national shortage of providers through 2030.

So we believe the solution to this problem is to increase the number of certified nurse midwives and certified midwives in America. In 2014, a Lancet series on midwifery exploring solutions to address essential needs of child-bearing women globally makes a clear call for investment in midwives.

Midwifery care results in high client satisfaction, excellent outcomes, and lower cost due to fewer unnecessary invasive and expensive
interventions. A systematic review of midwifery care in the U.S. concluded that evidence that care by CNMs is safe and effective. CNMs should be better utilized to address the projected health care workforce shortages.

So according to most recent data from ACME's annual monitoring report, ACME accredited 39 programs -- accredits 39 programs, with one program in active pre-accreditation status.

During this time, ACME-accredited programs had 2,647 students enrolled in either a master's, doctoral, or post-graduate certificate midwifery programs. Six-hundred fifty-four of these students graduated within the reporting window; 120 -- 120 -- I'm sorry, 127 students withdrew from programs due to academic failure, personal reasons, or disciplinary action. More than half of those withdrawals from the programs were actually for personal reasons.

This represents a completion rate of over 95 percent. The American Midwifery Certification Board, AMCB, the certifying agency
that certifies our graduates from ACME-accredited programs, ACME criteria 4(a)(2) establishes a benchmark requiring all programs to have aggregated annual AMCB pass rates of 85 percent. That's higher than industry standard.

AMCB reported in 2016 that 93.9 percent of our test-takers had passed a certifying examination.

So, finally, in the U.S. Department of Education report to the senior Department official on recognition compliance issue, the report found our agency not fully in compliance with Standard 602.20, which has been mentioned; and, again, mentioned by Stephanie and explained.

So we fully acknowledge and agree with the staff’s findings. The ACME Board of Commissioners, our decision-making body, will have a policy established by March 2018 addressing 602.20(b), and will submit the compliance report that has been requested to the Department as requested.

So thank you.
CHAIRMAN KEISER: Thank you very much. Claude, would you like -- do you have questions for the panel?

MEMBER PRESSNELL: Well, I am just curious on -- on the policy, can you tell us what you -- can you describe the framework of the policy, or have you begun to draft it and take an action on that, what that might look like?

MR. JOHNSON: Well, we are actually -- I think we are at a very timely window right now because we do a criteria review every five years, and we are coming up on that criteria review within the next few months. And we will have an opportunity to pull in our stakeholders from our professional association, from the education community, and get input into -- input into that decision.

So I think it would be premature right now to say what that will look like. Heather, do you want to say anything?

MS. MAURER: We are actually going to begin discussions starting this month in our
February Board of Commissioners meeting. We have monthly meetings. We were waiting for this meeting to get your feedback and the Department's findings.

MEMBER PRESSNELL: Have you ever taken any adverse action against programs, institution monitoring, or -- it indicates here that you have never had a -- you know, a reason to do an extension for good cause. But what type of negative actions have you taken against programs?

MS. MAURER: We placed the University of Puerto Rico on warning for not providing us with the pass rates. Their students were not required to take that exam to be able to practice midwifery in Puerto Rico. That program closed down within 18 months of us placing it on warning, which is unfortunate for Puerto Rico who has a maternal health care shortage.

MEMBER PRESSNELL: Especially in light of everything that has been happening down there. It seems like we have difficulty all the time.

If I could have some clarification on
your success rate. You were talking about those who did not continue in the program, and you listed off various reasons as to why that might be the case. And so were you counting them in the calculation, or were you withdrawing those who withdrew from the program out of the calculation of your success rate? I was a little confused on how you were doing that.

MR. JOHNSON: They were within the -- you have the more specific numbers here, right?

MS. MAURER: So your question -- I'm trying to get clarity on your question.

MEMBER PRESSNELL: Well, there was -- you talked about certain individuals that have withdrawn -- you were talking about the -- like the disciplinary matters, personal reasons, and so on and so forth. And so I couldn't tell if you were saying as a result they were taking the success rate -- they were taken out of the equation for success rates, or the success rate only dealt with those who completed the program and took the exam or --
MS. MAURER: Correct.

MEMBER PRESSNELL: -- or were they also included in the --

MS. MAURER: They are not included.

MR. JOHNSON: They are not included in the people that take the examination because you have to complete the program in order to take the examination. They would have withdrawn before that.

MEMBER PRESSNELL: So the number you are giving us was exam pass rate, not program completion rate. Is that what you were giving us?

MR. JOHNSON: Well, we gave you -- we gave you both. We gave you a --

MEMBER PRESSNELL: Could you recount that for me, then?

MR. JOHNSON: Yes. What we said was that we had -- we had 2,647 students enrolled in the programs. And in this -- 654 students in this reporting period have graduated. Okay? And then -- and 127 of those -- is it -- yes, 127 of
that total body of students have withdrawn from
the program, and then we gave those reasons for
withdrawal. And half of those we said were for
personal reasons.

MEMBER PRESSNELL: Can you just
describe the general health of the programs
nationwide in terms of those who are under your
purview, how you -- you know, do you feel like
they're in a good situation, healthy, growing
situation? or --

MR. JOHNSON: I am maybe -- I might
defer to my colleagues here as well, some of whom
are -- well, Anne is an active program director
in a midwifery education program right now, so
she might have some perspective on this.

But I would say that, you know, we --
we monitor several factors related to the
sustainability of the programs, the health of the
programs, and the programs by and large are
operating to a -- you know, a level in terms of
capacity size and capacity that is consistent
with the resources that they have at their
disposal.

Our limiting factor is not so much financial health as it is access to clinical resources associated with midwifery education.

MR. HUNT: Also, if you look at the overall health of the programs profession-wide, as measured by performance during the accreditation review, now it is not unusual for a program to have a few deficiencies going through the review, but because of the extensive process we use through the monitoring of reports afterwards, and our working with the programs to get them back in compliance, we don't get into situations where we have the put programs in warning.

So I guess what I'm saying is, judging by how a program has performed, going through the accreditation process, and being able to meet all of the criteria successfully at some point, that the health would be considered pretty good.

MR. JOHNSON: And I guess I would ask for just a little bit of clarification. When
you're speaking of health of the programs, are
you speaking about health against our criteria?
Ability to meet our criteria? Or health in terms
of their viability and sustainability?

MEMBER PRESSNELL: Well, I think
actually both. I mean, you know, honestly, it's
just kind of the -- if you would, you know, the
state of the membership within the association.

And if you generally feel like you've
got -- you definitely have some pretty strong
programs that are continuing to meet their
mission and purpose, or you have more struggling
programs than flourishing programs, I mean, it's
really not a specific question as it is kind of
if you step back and look at the overall body for
which you accredit, how do they look generally?

As a nation, should we concerned that
they are all near-failing programs? Or as a
nation, we should have confidence in --

MR. JOHNSON: I would have a high
degree of confidence, because we have people that
are tenaciously committed to what we're -- to
what we're trying to achieve against -- you know, against a challenging set of circumstances.

But I would say that, by and large, the programs are very responsive to the guidance. We are -- you know, we are a highly collaborative community, while maintaining the firewalls between accreditation, certification, and national association membership. We were doing -- we do work very closely together.

We work very closely with an association of midwifery program directors. We meet with them biannually. The programs are -- we have been surprised, since Heather has been with us, we have been -- instituted biennial training programs for programs that are interested in either becoming pre-accreditation - - they're exploring pre-accreditation or they want more insights into the accreditation process. They want to be healthy and successful.

I have been surprised by how many mature programs -- programs I wouldn't have expected to come to these workshops that come and
invest the time.

CHAIRMAN KEISER: Any other questions? Ralph.

MEMBER WOLFF: Thank you. I appreciate your presentation. I just would like to be a little bit more educated. I see a lot of your programs are in schools of nursing. And so do your graduates or students have nursing degrees? Is it completely independent? Is a licensure something -- is it -- I'd just like to understand where you fit into -- we just worked with ACEN. So where do you fit into the nursing hierarchy, if you will, or --

MR. JOHNSON: Thank you. It's a very -- it's an interesting question. It's a historical question. It's a question that has, you know, a state regulatory component to it. But most of our programs -- you know, most of our programs have historically been in schools of nursing preparing people as certified nurse midwives.

But we are approved as an accrediting
agency for certified nurse midwives, certified midwives. Both of those -- both of those graduates have the same set of essential competencies that they have to meet. There are certain things in a nurse midwifery program that we can -- that we can assume based on the nursing education that precedes the midwifery education.

But the outcome -- the educational outcome for both are the same, and they both set the same certification examination by the American Midwifery Certification Board.

We would love very much to expand the number of programs outside of nursing, as well as expand the programs inside of nursing. There are regulatory -- there are regulatory factors that make that challenging in some states where midwives are licensed under boards of nursing.

MEMBER WOLFF: So, in other words, not all -- do all states certify midwives, and it's independent of nursing certification? I'm a little confused.

MR. JOHNSON: No. Some states -- some
states will only certify certified nurse midwives. Okay? People -- or I should say license. We certify -- the American Midwifery Certification Board that certifies certified nurse midwives and certified midwives, it's the same -- again, same competencies that they're certified against.

But some states will -- some states will license both, have a mechanism for licensing both certified midwives and certified nurse midwives. And some only have a mechanism for certifying the -- for licensing the certified nurse midwives.

MS. MAURER: To further explain, at this time there are 10 states that license certified midwives. All 50 states certify certified nurse midwives.

MR. JOHNSON: Anne, did you want to say something?

MS. COCKERHAM: Maybe I'll just add on just a little bit. So bigger picture, the vast majority of our programs and our students and our
graduates were nurses before they came into our programs. And then this is an additional qualification. Is that --

MEMBER WOLFF: Thank you. That's helpful. Do all -- given that there are two levels -- nurse and non-nurse certified -- have hospital privileges? Or is there a limitation on who actually gets to be in the hospital during birth and supporting birthing?

MR. JOHNSON: Well, our graduates, whether they be certified nurse midwives or certified midwives, are all -- are all eligible for licensure, credentialing within -- licensing at the state level, depending on the state's requirements, and credentialing within the facility, depending on what the facility's requirements are.

But no states where certified midwives are licensed. I do not believe that there has been any -- there has been any terrific challenges to or onerous challenges to getting those midwives credentialed within health
facilities.

MEMBER WOLFF: Thank you. Helpful.

MR. JOHNSON: Thanks.

CHAIRMAN KEISER: Any other questions?

Thank you very, very much.

Call back our staff.

MS. McKISSIC: I have no additional comments at this time.

CHAIRMAN KEISER: At which point, Claude, I would entertain a motion.

MEMBER PRESSNELL: Yes. I make a motion to continue the agency's current recognition and require it to come into compliance within 12 months, and submit a compliance report 30 days after the 12-month period that demonstrates the agency's compliance.

MEMBER DERLIN: I'll second it.

CHAIRMAN KEISER: Is that Bobbie? Seconded by Bobbie. Further discussion? Hearing none, all those in favor, raise your hand, please, and wait until we count them. Okay. Any opposed? Sensing none, the motion passes. Thank
Move on to our next agency. The agency is the State Agency for the Approval of Public Postsecondary Education, the Oklahoma Board of Career and Technology Education. The primary readers are Rick O'Donnell and Federico Zaragoza. And would one of you like to make the introduction?

MEMBER ZARAGOZA: Well, Mr. Chairman, committee members, guests, under the current scope of recognition for the Oklahoma Board of Career and Technology Education, OBCTE, it authorized to approve to approve public postsecondary vocational education programs offered at institutions in the State of Oklahoma that are not under the jurisdiction of the Oklahoma State Regents for Higher Education.

The OBCTE is vested with the power to govern and establish criteria and procedures for 29 technology center districts encompassing 58 campuses across the state. The technology center school districts offer a multitude of programs.
with approximately 112,000 enrollments.

OBCTE accreditation enables the technology center to receive funding under Title 4 as well as other federal programs. The OBCTE was first recognized in 1976 and has held continuous recognition since that time.

The agency submitted its most recent full petition for renewal, recognition for consideration, at the fall 2015 NACIQI meeting. At that time, its recognition was continued, and it was requested to submit a compliance report on several issues. That compliance report is the subject of the current analysis.

Mr. Chairman, at this point, I will defer to staff for their analysis and recommendations.

MR. MULA: Good afternoon, Mr. Chair, members of the committee. For the record, my name is Chuck Mula, and I will be presenting a summary of the compliance reports submitted by the Oklahoma Department of Career and Technical Education, hereinafter referred to as the agency.
There are no third-party comments in connection with the petition, and no active complaints reviewed by the Department.

The Department's concerns are with the following issues of non-compliance with the secretary's criteria for recognition that were submitted in our compliance report.

Number one, the agency's guidelines do not meet the requirements regarding the inclusion of students and governing bodies in the development of the self-study document.

Number two, the agency did not provide evidence that schools are given the opportunity to respond to onsite review reports as required in the agency's guidelines.

Number three, and finally, the agency did not demonstrate it has policies, procedures, and standards that specifically address the requirements regarding recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services.

Therefore, the staff's recommendation
to the senior Department official is the agency be granted an extension of its recognition for good cause for a period of one year, and that the agency submit a report demonstrating its compliance with the cited criteria 30 days after the expiration of the one-year period, with reconsideration of recognition status, including review of the report, appearance by the agency at the NACIQI meeting to be designated by the Department.

That concludes my report, and I am available for any questions. There are representatives of the agency here.

CHAIRMAN KEISER: Questions from the speakers? From the reviewers?

MEMBER O'DONNELL: Chuck, I have a question. It looked like a number of these items were raised in the fall 2015 staff analysis, and they still haven't been corrected. And if I'm accurate in that, my question is, are these difficult things from your vantage point for them to have gotten done in over two years? Or are
they things that we should have expected to have been done by this point based on the 2015 analysis?

   MR. MULA: Excellent question. The agency would not have any issue in compliance with these because they have done it before. What has happened is the agency had gotten involved with the Baldrige method, included some of their requirements in place of the requirements that they have in their guidelines, which of course were not in compliance with the Department's.

   So we know that the agency has the documentation. We know that the agency has the - - is able to demonstrate compliance. They just did not include it in their reports because they were using the other system.

   So the Department is very confident, since we know that they have the information, we know that they've done it before, that they can provide the documentation. This is a minor documentation issue.
MEMBER O'DONNELL: Great. Thank you.

CHAIRMAN KEISER: Thank you, Chuck.

I invite the members of the agency to come forward. Please introduce yourselves.

MS. MACK: Good afternoon. I'm Marcie Mack, state director of the Oklahoma Department of Career and Technology Education, and with me today I have Dawn Lindsley, our accreditation manager.

Thank you for the opportunity to allow us to come and speak on behalf of the Oklahoma State Board of Career and Technology Education. As we work through the process, and as was mentioned, we have been accredited since 1976. We have had some changes during that process. We did have the opportunity in 2015 to come before and address some issues.

There was a change in outline for the accreditation. As Dawn and I have expressed in 2015, we are working to meet those compliance areas. We do have the very specific eight criteria that we go through for the five-year
accreditation for our 29 technology center districts and 58 campuses, so that we ensure the quality and integrity of our system.

And through that evaluation, we have the self-assessment application, the onsite visit, feedback summary report, which was a component of question last time. We also have the State Board approval and publications that we provide; the action plans, which allows for the opportunity for the technology center administration after the visit to provide their feedback and evaluation. We also provide technical assistance as they complete their action plans to move them forward and align with the addition of monitoring that we require on the third year.

We continual monitor the technology centers, and then provide their reevaluation in a five-year cycle. Each of the technology centers are -- their accreditation is reviewed annually, but their certification is for a five-year period.
And we would be happy to answer any questions. Dawn, do you want to explain our process from 2015 to today?

MS. LINDSLEY: So when we came in 2015, we were at the end of a pilot process. We have been piloting Baldrige for a couple of years and knew that that process was not going to work moving forward. And so we created a new model moving forward which has some aspects of Baldrige, but also combines with our 1976 model.

And so we have gone through that process with our board, redesigning everything from scratch, and now we have gone through two complete cycles with our new model in fiscal year -- well, in calendar year 2017. No schools were ever not accredited during any of that time, and so we have maintained the five-year cycle with all of our schools. We do about 20 percent annually.

CHAIRMAN KEISER: Questions from the reviewers?

MEMBER ZARAGOZA: So a self-serving
question. Alamo Colleges is one of the Baldrige institutions in the State of Texas, and so I understand basically the pilot phase is over, and you're moving on basically to -- went with the old model. What are the one or two lessons learned from this pilot effort that will carry over to improve your new accreditation model?

MS. LINDSLEY: Well, I would say we did not go back to our '76 model, and we really truly created a hybrid between the two. I think we came together with a pilot committee, evaluation committee, and really asked them some hard questions about, what did you like about the '76 model? What did you not like about it? Same thing with the Baldrige model.

And then that committee came up with their seven standards, and these are the things that we think that we need to move forward with in looking at to make sure we're ensuring quality within our schools. That was taken to the statewide Accreditation Advisory Committee. They gave their blessing on that, and then that went
forward to our board.

So that was -- the standards were approved in October of 2015 for the new process. We then developed the new model after that. We have been through two cycles with the new model, at least the first couple of -- first couple of years of the process.

And so I think learnings from that, we are really truly looking at where schools are at right now, both anecdotally and with a lot of data that probably wasn't included in what I call the 1976 model. And so that was some pieces that we truly picked up that will work well for us moving forward.

And we got away from looking at, give me a document and that's checked off the list to what does your process look like, how do you annually or regularly evaluate that process, how do you make improvements if you notice that something is wrong with that process, how do you implement new processes, how do you know what is key and important, and how do you know what is
just down in the weeds and can be taken care of through procedures.

And so I think those are some of the learnings we took away from the process moving forward, and it truly took us from not looking back at the last five years of what we've done at our schools, but where are you at, where do you want to go, and how can we help you get there?

MEMBER ZARAGOZA: Just to follow-up on Chuck's question, I'm assuming that you would agree that under the -- kind of the revised approach, you will be able to basically provide the information and comply with the staff requests?

MS. MACK: Yes, 100 percent.

CHAIRMAN KEISER: Question? I have a question. I'm confused. You were requested to come into compliance to our standards in 2015, and you did not, and the same problem still exists today. Why are we talking about Baldrige when we're not in compliance with our standards?

MS. LINDSLEY: We're not utilizing the
Baldrige anymore. At that point in time, we were ending that pilot and starting the new hybrid.

CHAIRMAN KEISER: Well, why are you not -- why did you not come into compliance from the requests in 2015? If your institutions did not come into compliance when you asked them to do that, what do you do to them?

MS. MACK: The issue of the compliance in 2015, there was a change in the outline for what the accreditation was going to be. We had been utilizing what had been approved since 1976, and there was a change in leadership that came in and changed that to be the Baldrige outline. That's what they wanted it to be.

So in our evaluation process, and looking at that, we have to go back through in the compliance pieces and make sure that we were meeting all the requirements from the Department of Education through the model that was outlined. And so in that process, we discussed the pilot outline of what that would look like, making sure that we are meeting all of those marks.
And so we do have the documentation. It was recommended that we go through the cycles. We had the procedures in place, but we have to provide the documentation, so we must complete that cycle to make sure that we provide documentation of the schools that have gone through that accreditation.

CHAIRMAN KEISER: Yes. But 2015 is now three years ago. And you were not able to come in compliance from 2015, and you have a new review which you're still out of compliance. Help me understand why you feel that's acceptable, that you can just not come into compliance when the Department of Education asked you to or required you to.

MS. MACK: What we were measured on in 2015 for compliance is not the model that we currently are utilizing.

CHAIRMAN KEISER: Compliant with whom? It wasn't compliant with us.

MS. MACK: The outline that was utilized in 2015, the areas for which they
outlined. In 2014, there was another individual that presented this piece, so we are -- the model that we are using from that forward is what we are coming in compliance with.

CHAIRMAN KEISER: Herman or Chuck, maybe you can explain. I still don't understand.

MR. MULA: When they came before us in 2015, they were using the Baldrige model, and they had some of their -- their basic requirements included our requirements, but it was a little bit on the foggy side. So what they did is they -- they anticipated that they would use the Baldrige requirements, and they responded to that.

That was not compliant, although they tried to take from our requirements and incorporate it. What happened was it does not do the same thing. Our requirements require us to verify that the agency has the policies and the process in place to be in compliance with those requirements.

They could not do that because they
could not provide us evidence of that process, because that requirement -- they were using the Baldrige -- did not require them to provide us evidence.

CHAIRMAN KEISER: But help me understand why they -- or you can explain why you felt that the Baldrige requirement superseded the requirements of the Department of Education.

MS. MACK: The Baldrige model that was chosen -- or why those superseded, we did not feel that they superseded what the Department of Education has. That is why we took the recommendations as -- and moved forward with the hybrid model and the pilot and worked very closely with the Department to make sure that we were in compliance, and we were meeting the specific outline of the Department.

CHAIRMAN KEISER: But my understanding is you did not come into compliance, and you're still not in compliance. Is that my understanding, or am I missing it? Or am I going in a different --
MR. MULA: No. They are not in compliance because they failed to provide us with documentation demonstrating application. They are in compliance with the other citations we had given them in 2015, but they missed out on these three issues because of the lack of documentation, although their compliance report explains that they do this. And we do have evidence that this is now part of their regular process again. We just do not have the documentation to verify application.

MS. LINDSLEY: And if you want us to go through each one individually -- for instance, the first one, 603.24(a)(3)(2)(a), inclusion of students and governing bodies in the development of the self-study document.

We do have a student that sits on our Advisory Council that goes through the self-study document on an annual basis. And we do annually meet with our board to do training, and they give us feedback. So that is taken care of. We can put that in writing.
CHAIRMAN KEISER: But you have so few compared to what other agencies have to go through. And yet three of them are still not met. It's confusing to me why those weren't met before you submitted your new petition. Herman?

MR. BOUNDS: One thing I want to bring up with the criteria for state agencies, although it's less, it is very, very, very specific. So the fact that the agency operationally is doing these things, their policies have to be stated such that they meet the question specifically.

So one of the issues, if we look under the requirement for, you know, student involvement in the self-study, that language in some of the agency's documentation was confused with what the site team does. So it's -- in our eyes, it's just very specific of the things they have to do to meet that specific requirement for those issues that are left.

They did knock out a significant portion of the things that were wrong back in
2015. It's just that these three issues that are 
still present, the process or some of the 
processes in place did not specifically address 
the issue that the question requires. So 
that's --

CHAIRMAN KEISER: Bobbie?

MEMBER DERLIN: Is it okay to have a 
different question, or --

CHAIRMAN KEISER: It doesn't mean I'm 
not coming back.

(Laughter.)

MEMBER DERLIN: I have a unit of 
analysis question. You have centers that are 29, 
and then you have 58 campuses. So is the unit 
accredited by your agency -- I mean, the district 
-- districts and campuses, is it the district 
that gets accredited, that includes all of its 
campuses automatically?

MS. LINDSLEY: Yes.

MS. MACK: Yes.

MEMBER DERLIN: Okay. So campus --
it's not -- you can't have an accredited district
and have a campus in there on sanction.

MS. LINDSLEY: Correct. Because there is institutional accreditation, and through our process with our onsite visit, and their self-assessment, they do an all-encompassing accreditation application.

And then in the site visit we go to every single campus that is a part of that district during the onsite visit. The most we have is nine different campuses with one particular district. Most of them are one, two, three, four campuses.

MEMBER DERLIN: Okay. Thanks. And then my second question is, do you have any districts on sanction of some sort now? And what supportive services do you provide to those districts in getting their issues resolved?

MS. MACK: We do have -- in our current cycle we do have technology centers who have been recognized for areas that they are not in compliance. And through that process, they have an action plan that they complete that will
go to the State Board for their approval of that action plan, to provide them support to come in compliance.

They will be given a certain time period to come in compliance. If they do not meet those compliance, then we will continue on with either continuing their accreditation to give them time for compliance or discontinue their accreditation.

And there is technical support through the various agency areas that we have that can provide them technical support in the area for which they had the deficiency. Whether that may be financial aid, maybe that is in student completion.

One of the pieces in here specific to advertising enrollment forms, are they meeting all of the compliance, federal requirements, in their documentations.

MEMBER DERLIN: Thank you.

MS. LINDSLEY: To further explain that, we give them 60 days, and then the board
has the latitude to give them further time, if they cannot complete it within 60 days.

MEMBER DERLIN: Thank you.

CHAIRMAN KEISER: Steve, then Ralph.

MEMBER VAN AUSDLE: I think it has been clearly stated that you will be in compliance with policies, procedures, to standards on advertising and recruitment of students, for example.

MS. MACK: Yes, sir.

MEMBER VAN AUSDLE: So let's just focus in on student advertising and recruitment for a minute. Do you have a policy on paper that just hasn't been submitted?

MS. MACK: Yes. We do have -- specifically for each of the technology center districts, they have specific guidelines. We have a statewide marketing group that outlines and sets those guidelines for -- they do have local autonomy in certain areas, but there is -- specifically, if you advertise your statements that you must have on your documentation, some of
the areas, depending on the dollar amount, you state the dollar amount for which that publication was spent.

The technology centers do turn that into the agency on a year basis in their June reporting. So, yes, we do have an outline for what they follow.

MEMBER VAN AUSDLE: Tell me about your recruitment policy. What's the essence there of what these institutions can do in recruiting students?

MS. MACK: In recruiting students, very specifically is the equity component, and to the ability to -- there are non-discrimination statements that outline very specifically of what they can ask for on an enrollment form, what they can't; outline very specifically what the enrollment procedure is. If there is an interview involved, what is the number of students that they take, which may vary from district to district, depending on their sending school rate.
What are their slots for secondary students, for postsecondary students? And that is the -- that is the outline that they have, the school districts, the graphics, the marketing, and those type of things. They do that on the local level, but we do have --

MEMBER VAN AUSDLE: And at the current -- present time, you are compliant with the Department standards? You just haven't shown the evidence is what --

MS. MACK: Yes, sir. Correct.

MEMBER VAN AUSDLE: Okay.

MS. MACK: Yes, sir.

CHAIRMAN KEISER: Ralph?

MEMBER WOLFF: Thank you. I'd like to turn my attention not to the issues that we've just been talking about. I'm trying to understand your process of accreditation. And it may be, Chuck, for you as well as for the agency. We've been hearing a lot all day about data on completion. And I don't see -- I've been going through your standards, and I don't see
anything here about tracking. So help fill in --
you have what are called quality standards, but
they are very general, and then you have a
scoring rubric, it looks like.

But I'm trying to understand, for
technical and vocational education, because we
also recognize a number of vocational accrediting
agencies that do collect this data, and they have
actually set specific numbers -- whether good
enough or not, it's a separate issue -- but how
do you address the whole issue of postsecondary
completion, placement, what happens to the
graduates of your programs?

Maybe you can point out, I don't see
where that would come out in at least the
materials that I'm scanning through now.

MS. MACK: Thank you for that
question. In the category section 7 on the
accreditation guidebook that they go through,
system impact, very specifically under the goal
of educational attainment.

The school districts on a yearly
basis, as students complete, they are required to do a follow-up report, which is six months after the completion of that school year. In that follow up, it is our current rate for completion, which does include positive placement, which is secondary and postsecondary is 94 percent positive placement.

If you just pull out our postsecondary, it's 90 percent positive placement. We measure, on positive placement -- continuing education is positive placement. If they're continuing on into an associate's degree or baccalaureate degree, employed is also positive placement, employed into the area for which they were trained, and military, also counts for us as a positive placement.

We do capture those who are leavers, those that are transfers, and those that are not, and they did complete the program but they are not employed. Those are metrics that we do capture on a yearly basis, and they are reported by the school in the system impact section of
their self-assessment that they do. And we do
report that out yearly in our annual report for
our system-wide impact that we do for our state.

MEMBER WOLFF: Great. Thank you very
much. I didn't get that far.

CHAIRMAN KEISER: What is your
completion rate?

MS. MACK: Our completion rate for
both secondary and postsecondary together is 94
percent positive completion.

CHAIRMAN KEISER: So 94 percent of the
students who start a vocational program in
Oklahoma finish?

MS. MACK: They either continue on
into postsecondary education because that also
measures our secondary students.

CHAIRMAN KEISER: I'm talking about
just the postsecondary.

MS. MACK: Just postsecondary is 90
percent.

CHAIRMAN KEISER: That's
extraordinarily high.
MS. LINDSLEY: Looking at different measures, there are 25 different metrics that we look at at an aggregate level through the accreditation process, and those are included in the system impact section.

In addition to that, we do look at segmented data that the schools choose to submit in their applications through standards 1 through 6, and that is specifically related to each of those standards. So there are 25-plus different metrics that we're looking at.

CHAIRMAN KEISER: Other questions? Go ahead, Ralph.

MEMBER WOLFF: Just more for clarification and understanding, the schools themselves are accredited by either advanced ed or the north central, or you're the only accredits? I'm trying to understand how the districts you work with connect to other accrediting bodies.

MS. MACK: The school districts are accredited by the State Board of Career and
Technology Education. Some of them -- they also are accredited by the state Department of Education for the secondary -- they also serve secondary students.

And then some of them may be recognized by other accreditors, but primarily all 29 of them are recognized -- we are recognized as their accreditor as the State Board of Career and Technology Education.

CHAIRMAN KEISER: George.

MEMBER FRENCH: Yes, sir.

CHAIRMAN KEISER: Haven't heard from you all day.

MEMBER FRENCH: I have a simple question on a procedural -- on the staff recommendation. Do you want to wait until we get to that part?

CHAIRMAN KEISER: Whichever you want to do.

MEMBER FRENCH: Okay. It's that the staff recommendation is to approve for good cause for a year. I have raised this question before.
So we're saying for a year, until this time next year, and then the report is due 30 days after we meet next time. When would they come back before us, if we continue for good cause?

MR. BOUNDS: I was talking to Jennifer when you asked the question, but I think -- so their good cause period is one year, and then they have to submit a report 30 days after that period demonstrating compliance with the cited criteria.

Now, what will determine when they appear before the NACIQI will depend on our staff workload and when we can get them in and how the next meeting is scheduled. But we will have their compliance report. It has to be in within those timeframes. When they get to the next NACIQI meeting depends on the logistics.

MEMBER FRENCH: And I guess my concern, Mr. Chairman, is we've been dragging since 2015 on this one. It seems like we've been dragging since 2015 on this one. I was just trying to see if there was a procedure whereby we
MR. BOUNDS: We gave them a year just because we wanted to make sure that they had ample time to do things. I mean, if the agency were to feel that they could fix this in six months, I would have no objection to the motion being changed.

It's better to make sure that they have time to go back and conduct their meetings and get their policies changed, you know, with state requirements, and whatever those things may be, versus put a short window in and them not have enough time to correct the issues and get the proper -- as I was stating before, to actually get the proper language in their policies that specifically addresses the state criteria, because, again, the state criteria is more specific and detailed than some of the regular accrediting --

MEMBER FRENCH: Right. So we're bound by six months or a year.
MR. BOUNDS: You could -- you're not bound -- you are all not bound by anything. You could -- if they say they can do it in a month, you can --

MEMBER FRENCH: So you see where I'm trying to go. I'm just trying to go to not one year from today, which is when we'll be meeting from NACIQI and their report is due 30 days after a year from today versus 30 days before when we meet next year.

MR. BOUNDS: That's from -- yes, I'm sorry. It's from the date of the letter. So the SDO has the 90-day, so it will be from the day of that letter, not from the date of the meeting. But I have no problem if the agency says they can do it faster. You guys want to amend our recommendation, that's -- I have no objection to that.

CHAIRMAN KEISER: Claude, and then Frank.

MEMBER PRESSNELL: Yes. As you can tell, the -- a number of members on the committee
are really confused as to why -- why we're still here. And so especially since, you know, you never considered the Department's requirements to be superseded by the Baldrige, so you knew you had to be compliant with these anyway.

We told you you had to be, and I'm kind of understanding or hearing from you that you're actually in compliance but you couldn't provide documentation that you're in compliance. I'm really confused as to why that's the case.

So you really need to help us out here because, you know, and staff indicates -- and we look at these measures, these are not super difficult things to do. And so what's going on?

Help us understand this a little bit better because, again, if you would have thought or if somebody would have thought, well, Baldrige supersedes the Department, which you are saying you did not do at all, then you should have been in compliance at the very beginning anyway. So it's concerning.

MS. MACK: For the conversation around
us, including Baldrige, above this particular piece --

   MEMBER PRESSNELL: No. No.

   MS. MACK: -- that was not the -- that was not -- we were not a part of the process when that was designated for the State Board and the agency. So in the process, as we evaluated that, we want to make sure that we are in compliance with the Department and making sure that we're meeting that criteria.

   MEMBER PRESSNELL: Right.

   MS. MACK: To go through the process and make sure that we have the evidence with the criteria that we list in the self-assessment and moving that forward.

   We have gone through the process, getting the evidence of the papers. The schools must provide us their feedback. We have the six-month for their action item to provide those completed documents. We have been through the process. We do have that when those documents are completed, during the time period that the
window was open for which we could upload those we did.

The window to -- for us not to upload closed November 10th. The other documents that we have, we finished the other cycles. We can -- we do have the documents to upload to meet that criteria. They were not -- the schools had not completed all of their piece for the evidence for us to be able to upload that by November 10th when the window closed for us to provide the documentation and the evidence as outlined. It's very specific for the states.

MEMBER PRESSNELL: Yes, I understand. And maybe -- feel free, staff, to --

MR. MULA: What has happened is the agency, these people are new to this. They're not the ones that did the 215.

But what has happened is the process of applying these requirements has not been completed. So the agency didn't send us anything when they should have basically told us they had not had time to apply this certain application.
We would have understood that and made different citations. But we did not know that they weren't able to apply it. This is the first time that I'm picking this up.

CHAIRMAN KEISER: Frank, then John.

MEMBER WU: I just wanted to speak in support of what George was saying. I think it's good for two reasons for us to look at not just the formula we use.

The first is because that makes us lazy. We should be thinking about does this agency need more time or less time, is there something, rather than just mechanically saying one year. So I just think it's good for us to get away from just boilerplate in each instance.

The second reason, though, this goes back to the nurses we saw about two hours ago. Our pressure actually can produce good effects. Now I'm not saying that we just apply it indiscriminately.

But where there's a reason to do that, and there isn't a reason for delay, I'm all in
favor of saying 30 days or 60 or 90 or 6 months, as long as we bear in mind the practicalities. Often something has to go in front of a board or be approved, and there's a process.

But we shouldn't just mechanically say one year, one year, one year with each agency.

So thank you, George.

CHAIRMAN KEISER: John.

MEMBER ETCHEMENDY: So let me describe what I think I'm gathering. And maybe you could confirm it or tell us something about the timing.

But as I understand it, you, not you, but Oklahoma started trying to build a Baldrige model assessment system. And you thought it was consistent with the Department's requirements, again, not you, but whoever your predecessors were.

That didn't work out. And after piloting it, you abandoned the pilot. And you, now you personally have been trying to develop a hybrid model that uses some of the Baldrige ideas but conforms to the Department's requirements.
Am I right so far?

    MS. MACK: Yes.

    MEMBER ETCHEMENDY: Okay. So I guess my question is, when did you abandon the pilot and start on this new process of redesigning a hybrid model, designing a hybrid model? When did that happen? Was that 2015?

    MS. LINDSLEY: So we, 2013 was when we started the Baldrige pilot.

    MEMBER ETCHEMENDY: Okay.

    MS. LINDSLEY: So, '14/'15, '15/'16 school years we piloted. In the middle of that process is when this committee said it is not meeting our requirements, you need to change.

    And so we expedited ending the pilot. But we didn't want to end it mid-cycle. We wanted that group to finish out. And so that's what we did.

    So, when we came to you in 2015, we were finishing out that '15/'16 year at the same time as training the schools moving forward on the new model. So we were right in the midst of
that when we came last time.

MEMBER ETCHEMENDY: Okay. So that's sort of what I understood, in which case it is not, in my opinion, it is not at all surprising that that was two years ago, that it's taken them this long to redesign their model, abandon the pilot, redesign and put in place the new system, whatever it is.

And the fact that they're not in compliance but have some remaining things to show is not surprising. And so I don't agree with the sense that I'm hearing that we ought to force them to do it more quickly. I think giving them a year is just fine.

CHAIRMAN KEISER: Any other questions? Thank you. Oh, I'm sorry, Bobbie. I turned, and then you put your hand up.

MEMBER DERLIN: Well, I was feeling ambiguous, but now I'm not. So I just wanted to check, and this is really a process consideration. I'm not so sure it's a question for the agency. So it might be Chuck or Herman.
So, if this group had an adequate time to apply its policies, which are in compliance with our rules, and we give them a year and they are ready and submit their documentation in a month or two, are they then on the queue to come up for a meeting? They don't, I guess what I'm saying is they don't have to wait a year, do they?

CHAIRMAN KEISER: Do we want to discuss this when we get towards a motion, because these are all procedural questions?

MEMBER DERLIN: Okay.

CHAIRMAN KEISER: If that, because that is a -- I think we're going to get into those conversations. Well, thank you very much. And I guess it's your turn, Chuck, to summarize if you have things to say. I'm sure you do.

MR. MULA: I would just like to go back a little bit and hope to clarify to the Committee what brought us to this place.

The agency's submission of its original compliance report that was required at
the year 2015 meeting was basically in compliance except the fact that there are documentation issues that we require, that are requirements the criteria requires, so that we could verify that they applied this process.

There was no evidence from these three areas in documentation where we could definitely say the Department has verified that this application is done according to their requirements, which they are in compliance with. The policies are good. Their change back to that system that they originally had is working. They just not have had the chance to apply.

If they would have told us that they did not have the opportunity to apply this yet because of the process that is going, the feedback that's necessary from the institutions, then we would have made a statement notifying this Committee that they were in compliance, except they told us that they were not able to comply and maybe at a later time we would provide that evidence to you.
Your ability, our ability and the
timeframes, a year plus 30 days, is in the
statute. We can't move. That doesn't mean that
you can't. But we will not be able to tell the
institution ourselves that, oh listen, we gave
you a year plus 30, but you can give it to us in
60 days if you want. We can't do that.

So you're allowed to do that. So, if
that's what you want to do, that's fine.

CHAIRMAN KEISER: Thank you. Is there
a motion? I will entertain a motion at this
point. It can be anywhere to begin the
discussion.

MEMBER O'DONNELL: Sure, I'll move the
staff recommendation that the agency be granted
an extension of its recognition for good cause
for a period of one year and that the Agency
submit a report demonstrating its compliance with
the cited criteria 30 days after the expiration
of the one-year period with a reconsideration of
recognition status thereafter, including review
of the report and appearance by the Agency at a
NACIQI meeting to be designated by the Department.

MEMBER ZARAGOZA: Second that.

CHAIRMAN KEISER: Motion made and second. Discussion, because I certainly do have some? May I start?

I have a hard time here. We treat governmental agencies differently than we treat private agencies. It is not right.

The interest of the students is that our agencies come in compliance. This agency hasn't been in compliance since 2015, and that includes 25 percent of their standards which they have to meet with us.

You know, they don't have a lot. They just have to meet the standards, like 10 or 11. And they missed 25 percent.

And they didn't even understand that they had to submit it after being told in 2015, which certainly brings into question the competence of the agency in delivering in the accreditation process, which most accrediting
agencies wouldn't put up with if their
institute said, well, we just didn't know we
had to provide the documentation.

So I have a real difficult time. We
have taken another agency out for less. And
that's another whole discussion. I will
entertain more discussion.

MEMBER FRENCH: Mr. Chairman, I concur
with your sentiments. And my concern would be if
the staff recommendation and if Chuck feels like
they are in compliance and possibly were in
compliance since 2015 but they didn't provide
adequate information, so to speak, then I suggest
that we don't give them a year and 30 days,
because that means, this is 2018, that means 2019
they can't make our February meeting. So they
basically go to November 2019, which is almost
2020. That's two months from 2020. We're
basically going to give them two years to get
this right.

Now, I suggest that we give them less
than a year. If Chuck is correct in saying that
basically they're in compliance, then let's let them show that they're in compliance, but don't give them basically two more years before they come back before us. I just can't see that.

CHAIRMAN KEISER: Herman.

MR. BOUNDS: I mean, now look, while I don't disagree with Chuck's analysis, I want everybody to be clear.

There are some language changes that they need to make to their policies to correct. So they have some minor issues that they need to fix in policy even though operationally they may be operating like we want. You know, the students may be involved with the development of self-study, but that language needs to be put in documentation.

So I just want to remind the Committee of that. There are some language changes that needs to occur in their documentation.

CHAIRMAN KEISER: Further discussions?

MEMBER FRENCH: Do you have a second, Mr. Chairman?
CHAIRMAN KEISER: Yes, we do. There's a motion --

MEMBER WU: Wait, wait, wait, just -- I'm sorry.

CHAIRMAN KEISER: I'll wait, wait, wait.

MEMBER WU: I'm sorry. So, if there's a pending motion for George to do what he wants to do, he needs to make a motion to amend this, which I would support.

MEMBER FRENCH: So would it be a friendly amendment?

MEMBER O'DONNELL: Well, I don't know what your amendment --

(Laughter.)

MEMBER FRENCH: Six months, less than one year and 30 days just to give the agency the opportunity to come back before us at this time next year or in the fall, six months.

MEMBER WU: Could you name a time? If so, I would bet, George, if you said 24 hours, that would not --
MEMBER FRENCH: Right.

MEMBER WU: -- be friendly. But can you name --

MEMBER FRENCH: Six months, six months is what I would.

MR. BOUNDS: I couldn't bring them in for the next meeting because the Federal Register notice announcing that meeting has already been out. So it would not be until --

MEMBER FRENCH: A year.

MR. BOUNDS: -- December or whenever that next meeting occurs in January, when that next meeting occurs.

MEMBER FRENCH: When is that?

MS. HONG: We're looking at January or February of next year.

MEMBER FRENCH: We won't have a fall meeting this year?

MS. HONG: No, we're looking at the end of May for the second NACIQI meeting of the year.

MEMBER FRENCH: Well, thank you.
MS. HONG: Yes.

MEMBER WU: May I just note something, which is I've realized we're in this sort of surreal world of NACIQI where every time we say X number of days or months or years it's actually two X that? So, whenever we say one year, when you look at it realistically, it's two.

So let's just bear that in mind, which is why we should say six months and it will mean a year. Because if we say one year, as George has pointed out, it's really two years, maybe two and a half years. So that's another reason to just shorten everything.

MEMBER FRENCH: I would propose a friendly amendment of six months.

MEMBER O'DONNELL: I would consider that friendly.

CHAIRMAN KEISER: Okay. The motion has been amended friendly and --

PARTICIPANT: I'm okay with that, too.

CHAIRMAN KEISER: -- and the second has agreed to that. Okay. Is there any further
discussion? Bobbie, and I caught you this time.

MEMBER DERLIN: But I'm not going to ask my original question. I just want to check. If this adjustment is made and the timeframe is now six months plus 30 days, is the agency confident it can meet this?

CHAIRMAN KEISER: But what's the -- I mean, they haven't met it for two years. So, if they don't meet it --

(Off mic comments.)

MEMBER WU: Well, so we don't want to come across I think as too harsh. But I don't think we want to routinely ask agencies if they can meet deadlines we impose any more than other people who set deadlines say, you know, is this okay with you, right? When we set deadlines with students, we don't negotiate with them.

MEMBER DERLIN: Well, I certainly don't disagree with that, Frank. But at the same time, we also have Herman's remark that there are some policy tweaks that they need to do. And we don't know quite how that influences their
internal procedures. And if we don't care, then we don't care.

MEMBER WU: Should we call the agency back up, because -- so if the agency said our board only meets once a year, which would be a bad idea, but if they said that, then we would have some sense they can't do it, right?

CHAIRMAN KEISER: Well, they can have an emergency meeting. I mean, this is important. They lose their recognition. They lose the Title IV that those students are entitled to. So this is not a game to play. This is a very serious issue.

And for two years, they've neglected to meet the standards. So I think you guys are being very nice and much more patient than I am. But then again, I have my own issues. So --

MEMBER WU: So may I, Chair, sum up? I think if we pass this, we are actually signaling to the world, which is the people seated out here, that we are serious about deadlines and we don't want to be lax and, you
know, we want to move this along, right? I infer that's what George is saying.

CHAIRMAN KEISER: Okay. Any further discussion? Sensing none, all those in favor of the motion signify by raising your hand.

CHAIRMAN KEISER: All those opposed?

(Show of hands.)

CHAIRMAN KEISER: And I don't vote.

So I would have opposed, but I don't. So motion carries.

We are now at a point, it is 2:55. We have run out of institutions or agencies on our agenda.

However, I am told that we have an agency that is willing to come before us today instead of tomorrow so they could probably go home. And actually, I think they're here in Washington, so they don't have far to go.

And I have recused from that. So I'm going to turn over the microphone to --

MEMBER WU: Sure, I'm happy to. I just want to confirm. There isn't a third-party
commentator issue. We're good to go with this agency. Okay. Great.

      CHAIRMAN KEISER: I'll be back.

      MEMBER WU: Okay. Any other recusals?
      (Off mic comments.)

      MEMBER WU: Oh, a five-minute restroom break. All right, five-minute break.

      (Whereupon, the above-entitled matter went off the record at 2:54 p.m. and resumed at 3:03 p.m.)

      MEMBER WU: For the record, my name is Frank Wu. I'm the Vice Chair, and I will be presiding. Our Chair, Art Keiser, has recused himself, so if we could note that for the record. We now have a quorum.

      And we're taking early -- and I note for the record there are no third-party commentators, and the Agency has consented to coming before us one day early.

      This is the American Physical Therapy Association, Commission on Accreditation in Physical Therapy Education, known as CAPTE, C-A-
So we will proceed in the manner that we always proceed, that's primary readers, the Department staff, agency representatives. So the primary readers for CAPTE are -- let me see. Who are the primary readers? John Etchemendy and Claude Pressnell. And, gentlemen, which of you will be speaking?

MEMBER ETCHEMENDY: Yes, so I'll introduce the agency.

MEMBER WU: Okay, John Etchemendy.

MEMBER ETCHEMENDY: Yes. So the American Physical Therapy Association, APTA, is a professional association of physical therapists, physical therapy assistants, and students of physical therapy.

And CAPTE, the Commission on Accreditation in Physical Therapy Education, is the unit within APTA that is a programmatic accreditor.

They accredit and pre-accredit physical therapists, education programs leading
to the first professional degree, so those are masters degrees and doctorates, and physical therapy assistant, PTA, education programs, which are at the associate level.

CAPTE accreditation is required for access to the scholarships for disadvantaged students program. But they are not a Title IV eligible accreditor, which is why they can be part of APTA and not violate the separate and independent requirements.

CAPTE currently accredits 202 physical therapy programs, 274 PTA programs, and 74 pre-accredited or developing programs throughout the United States and the District of Columbia and its territories. They do some international accreditation, but that's irrelevant to us.

The Commission on Accreditation in Physical Therapy Education was first, sorry, the CAPTE was first recognized by the Secretary in 1977 and most recently re-recognized in 2014.

And I will turn it over to the staff now.
MS. DAGGETT: Thank you. Good afternoon, Mr. Vice Chair and members of the Committee. For the record, my name is Elizabeth Daggett, and I am providing a summary of the review of the petition for renewal of recognition for the agency, CAPTE.

The staff recommendation to the senior department official for this agency is to continue the agency's current recognition and require a compliance report within 12 months on issues identified in the staff report.

This recommendation is based on our review of the agency's petition and its supporting documentation, as well as the observation of a commission meeting in April 2017. The Department did not receive any written third-party comments.

Our review of the agency's petition found that the agency is substantially in compliance with the criteria for recognition. There are a couple of outstanding issues that the agency needs to address in the recognition area.
of required standards and their application. Specifically, the issues concern the agency's enforcement timelines and actions.

We believe that the agency can resolve the concerns we have identified and demonstrate its compliance in a written report in a year's time.

Since the agency's last review in the spring of 2014, the Department has received no complaints. Therefore, as I stated earlier, the staff is recommending to the senior department official to continue the agency's current recognition and require a compliance report in 12 months on issues identified in the staff report. Thank you.

MEMBER WU: Thank you. Do we have the agency representatives? Thank you. And if I might remind you to press the button on the speaker before you start speaking, and if you would identify yourselves. Thank you.

DR. MARCOUX: Thank you. The Commission on Accreditation in Physical Therapy
Education would like to thank you for this opportunity to speak on behalf of the CAPTE community.

My name is Dr. Beth Marcoux. I'm the current Chair of CAPTE and currently Professor Emeritus and past Chair in the Department of Physical Therapy at the University of Rhode Island, currently serving as adjunct faculty in the Department of Physical Therapy at Franklin Pierce University in Manchester, New Hampshire.

I am a licensed physical therapist and have been involved in education of physical therapists for the past 40 years.

Dr. Sandra Wise is our Senior Director of Accreditation. She's been involved with higher education, including over 20 years in accreditation.

Also with me here today is the accreditation staff who provide limitless hours of commitment for quality assurance in physical therapy education.

We'd like to express our appreciate to
Elizabeth Daggett for her technical assistance during the review of CAPTE's petition. Her knowledge of the regulations is clearly evident and her guidance proved invaluable during the process.

We are extremely proud of our organization and committed to our vision of excellence in education of physical therapists and physical therapist assistants. And we believe that educational quality and integrity cannot be compromised.

The CAPTE accreditation process is designed to ensure that there are appropriate competencies in entry level practices of graduates to assure safe care for physical therapy patients.

An additional strength of CAPTE is its diversity of the commission members. CAPTE accredits physical therapists, known as PT programs, at the doctoral level, as well as physical therapist assistant programs, known as PTA programs, at the associate degree level.
CAPTE is made up of 31 commission members, 23 of whom are licensed PTs or PTAs with academic and practitioner backgrounds. The remaining members include three public members and five higher education administrator members.

Our members have experience across the spectrum of higher education, including colleges and universities in all sectors, as well as experience in distance education.

The commission's members' qualifications and knowledge allow for sound accreditation decisions.

CAPTE now accredits over 600 programs. From 2013 through 2017, CAPTE granted candidacy to 47 programs, denied candidacy to 29 programs, granted initial accreditation to 87 programs, and withheld accreditation from 12 programs.

Additionally, CAPTE took action on 1,157 accreditation reports and approved 63 substantive change requests.

Based on the CAPTE actions, the areas of non-compliance most frequently cited and
resulting in citations and frequent monitoring include standards related to, for physical therapy programs, curriculum assessment, workload policies, core faculty scholarship, sufficient number of core faculty, and administrative support.

For physical therapist assistant programs, the most frequently cited required elements were assessment process, core faculty assessment, core syllabi, and determining students are ready for clinical experiences.

We'd like to highlight the commission's use of bright lines for student achievement. CAPTE has set an 85 percent benchmark for licensure pass rate, 90 percent employment rate, and for PTAs, a 60 percent graduation rate, and for PTs, an 80 percent graduation rate.

Based on data collected from our program annual reports, the average program graduation rate for physical therapist assistant programs is 85.4 percent and for physical
therapist programs is 95.5 percent.

Licensure pass rates are available from the national licensing organization. We've established what we believe to be a reasonable pass rate based on a three-year history of respective programs.

CAPTE requires programs to submit data annually in relation to pass rates, employment rates, and program graduation rates, as well as other established required elements. These required elements are clearly reflected through the accreditation standards and are continuously monitored via the accreditation annual report and the continuing accreditation process.

Failure to comply with any one of the required elements within the standards initiates the two-year compliance timeframe for the program.

If a program fails to meet any of the bright lines for student achievement outcomes, CAPTE requires the program to provide a detailed action plan. The program's progress for meeting
any improvement is reviewed at six-month intervals.

Programs not meeting the bright lines within the two-year timeframe have accreditation withdrawn unless the program has demonstrated a good faith effort for coming into compliance and the commission determines that a good cause extension is warranted.

The bright lines are used to distinguish programs at high or low risk. In addition to being monitored through annual and interim reports, at-risk programs can be given shortened accreditation terms, monitored through increased reporting, and potentially be subject to a focused site visit.

Between November 2012 and November 2014, 33 programs were placed on probation. Of those 33, 30 programs documented components of compliance within their designated compliance timeframe, with 3 programs having accreditation withdrawn.

CAPTE offers multiple resources to
assist programs to come into compliance with all accreditation standards and to promote program improvement.

For example, workshops are held throughout the country three times a year. The accreditation staff is also available for individual guidance. Development of learning modules is underway to provide programs with best practices for accreditation processes.

As a vast majority of the at-risk programs maintain accreditation, the resources provided are clearly beneficial in assisting programs with successfully reversing their risk status.

With respect to outstanding concerns, one, the agency must provide documentation to demonstrate it has taken an adverse action and enforce the timeframes required by this section. And, two, the agency must provide documentation to demonstrate that it clearly communicates to a program when it grants an extension for good cause.
First, Section 8.26(b), page 77 of the CAPTE Rules of Practice and Procedure state that, one, if the program is judged not to be making satisfactory progress toward bringing the program into compliance, CAPTE will act to place the program on probation accreditation and/or shorten the accreditation cycle or withdraw accreditation.

Two, if the program does not come into compliance within the two years of being determined to be out of compliance, CAPTE will withdraw accreditation unless the program has provided sufficient evidence of a good faith effort to meet the standards and elements and CAPTE is convinced that compliance will be achieved within a reasonable timeframe not to exceed two years.

The data referred to earlier for the 2012/2014 timeframe includes three programs whose accreditation was withdrawn for failure to comply with CAPTE standards within its maximum timeframe.
Additionally, CAPTE would like to relate one more specific example of taking an adverse action in enforcement of timeframes.

In spring 2013, a physical therapist assistant program was found to be out of compliance with required bright line for pass rates, requesting a compliance report for the program for the fall of 2013.

Based on continued non-compliance, the program had its accreditation withdrawn in the fall of 2014, which was then subject to reconsideration.

The program requested and was granted a reconsideration hearing in spring 2015, whereby the original decision was reversed and the program was placed on probation for six months for good cause.

Although the program continued to be out of compliance and was to have its accreditation withdrawn, CAPTE was notified of the institution's intention to close. CAPTE continued probation accreditation until the
program taught out its last students.

With respect to 602.20(b), clear communication to programs that they've been granted a good cause extension, CAPTE's Rules of Practice and Procedures indicate that CAPTE will withdraw accreditation unless the program provides evidence of a good faith effort to meet the standards and elements and CAPTE is convinced that compliance will be achieved within a usual, within a reasonable timeframe not to exceed two years.

The rules and procedures thus define the circumstances under which a program can demonstrate that there is cause for an extension to be granted.

The documents provided to programs for their accreditation status now clearly indicate that the program was granted an extension for good cause. CAPTE's decisions that are published on its website will include a category identifying programs that were granted a good cause extension.
Examples of the good cause and decision templates are available should any NACIQI member want to review those documents.

Once again, on behalf of the Commission on Accreditation in Physical Therapy Education, the commission members and staff would like to thank the Department and the Committee for the opportunity to present additional information in support of our petition.

Dr. Wise and I are ready to answer any questions you may have.

MEMBER WU: Why don't we start with the primary readers? I see John Etchemendy.

MEMBER ETCHEMENDY: So I'd like to understand the -- first of all, congratulations. This is really impressive. The numbers that you have here are really impressive on completion and pass rates and so forth, and employment. All of those numbers are incredibly impressive.

Could you explain how long the programs are and how you measure graduation rates? So how long is the doctorate? How long
is the masters? How long is the associate? And what is the length of time that you measure for graduation rate?

MS. WISE: I'd be glad to answer that question. The associate degree programs are generally two years --

MEMBER ETCHEMENDY: Two years, yes.

MS. WISE: -- like the traditional. The graduate programs, now at the doctorate level, we just have one masters program left that's being taught out by the end of this year.

So the doctorate programs will run anywhere from two and a half years to four years. So there's no standard length of time for the doctorate program.

So, consequently, our graduation rates are tailored to the cohort where the student started. So we look at, we ask the programs to look at what students started the program, and then within a year after completion, how many of those students graduated with that cohort, because of the steplock nature of the programs,
you know, you have to take this course or take
this course, you have to go this way, the
students who may be dismissed or fail have to
wait out and go into the next cohort.

So we don't count that within the
graduation of the first cohort. They go into the
next cohort. So they count against the
graduation of the first, and will go into the
other one.

So it's real hard to say that we give
them 150 percent time and all of that because of
the lockstep nature of the program. So does that
answer your question?

MEMBER ETCHEMENDY: Yes. So it's
really the length of the program plus one year
basically --

MS. WISE: It is primarily.

MEMBER ETCHEMENDY: -- is what you
look at. Okay.

So how exactly did you choose the
number, the target numbers, the 60 percent for
the PTA and the 80 percent for the doctorate? It
sounded to me like you looked at three years of data and that was the average?

     MS. WISE: Yes.

     MEMBER ETCHEMENDY: So you took the average to be the bright line.

     MS. WISE: That's where we started.

So, and I am three years into this. And so I wasn't here when they did the review and renewal of their standards and required elements, which happened in, started in 2013, '14 I should say.

     So, when they were looking at them, they began to want to set the bright lines. And that's what they did, so because there's no research that establishes what it should be and what constitutes a good rate for outcomes as far as competence in practice and things like that.

     So what the committee on the review for the standards did was, they did. They looked at the three-year average rate and then determined from the committee review whether that's where they wanted to set it.

     And so some of the rates are even
higher than that three-year average, because they felt that the average wasn't really where they wanted the programs to be.

So, with that then, they sent that out to the communities and the stakeholders for review, took in their comments. And from that review and the commission's decision is how this, the benchmarks were set.

MEMBER ETCHEMENDY: So, yes, and it's interesting.

MS. WISE: Yes.

MEMBER ETCHEMENDY: It's great if you can, if it works. But in effect, what you do when you take the average as the bright line, then you basically say half of your programs are out of compliance from the beginning, from the get-go.

MS. WISE: Yes.

MEMBER ETCHEMENDY: And you've all got to get --

MS. WISE: Yes.

MEMBER ETCHEMENDY: -- get above that,
which is great if it works. It's a little bit
dangerous I think.

MS. WISE: So I pulled some other
numbers just to let you know where we're at right
now.

MEMBER ETCHEMENDY: Okay.

MS. WISE: Would that help?

MEMBER ETCHEMENDY: I think you gave
us some other numbers. And they look really
great. The more recent numbers are even higher,
right?

MS. WISE: Yes. So I just looked at
our latest data that -- we look at the rates
every spring, because we get them at the end of
the year. So, in spring of 2017, which is not in
this petition, for the PTA programs, which is
where we find the average is at 60 percent, we
only had 10 programs below it. So I think it is
--

MEMBER ETCHEMENDY: It's working.

MS. WISE: -- a reachable target.

MEMBER ETCHEMENDY: Yes, it's working.
MS. WISE: And it's working to bring them up.

MEMBER ETCHEMENDY: That's great.

MS. WISE: Yes.

MEMBER ETCHEMENDY: I applaud that in spite of the fact that it seems to be an odd way to pick the --

MS. WISE: Right.

MEMBER ETCHEMENDY: -- the bottom line, right?

So the one additional question was suppose one of the, a doctoral program fails to meet the 80 percent. Maybe they drop, you know, they drop below, say, 75 percent or 70 percent. And you tell them, okay, you have two years to come into compliance.

Given that the program is a four-year program, isn't it going to be kind of difficult for them to all of a sudden come into compliance, unless they decide that, well, we're going to graduate everybody or somehow go back and the people that left and decided they were dropping
out, you grab them back and -- I mean, how does
the program go about and make that change in two
years?

MS. WISE: So this is probably where
this good faith effort comes in and how we need
to clarify, which is what is on our
recommendations for improvement, is to make it
clear that that's what we're doing for the
program.

So we would look at them. They have
to come in. And we monitor them every six months
for a plan that they've developed to increase
their graduation rates.

And the commission will decide if the
plan sounds reasonable, if it's going to do what
it's supposed to do. And then we'll watch for
trends. So we'll watch those graduation rates
every year for two years.

And if they're trending up and they're
real close, then we give the good faith effort
and put them in. You know, if they're not, they
could go on show cause for just six months to see
if the next rate comes up.

    So that's how that timeline works.
And we just need to do a better way of communicating it to the programs.

    MEMBER ETCHEMENDY: No, no, that seems reasonable. Great. Well, thank you. And it's very impressive what you're doing. And I resist asking you about my herniated disc.

    MS. WISE: And she could take care of you.

    MEMBER WU: John, feel free to do that during the next break. Any other questions? Yes, Claude.

    MEMBER PRESSNELL: Thank you again for coming. I appreciate all that you do.

    So I wanted to have you address, if you would, particularly the findings. You had a lot of narrative around what appeared to be addressing the findings. So was there some reason why you couldn't demonstrate compliance during the review on 602.20(a) and (b)?

    MS. WISE: Yes, probably it was the
fact that I wasn't real clear myself what was needed and that I was attempting to find evidence, excuse me, for a process that probably was more involved than what the staff liaison was really looking for.

So, in essence, I provided some documentation where we were withdrawing, but not what lead up to it as she had wanted or as was the expectation. And so they're just -- we have it. We just, again, need to provide it.

MEMBER PRESSNELL: And the staff indicated that they don't see any problem with you providing it.

So kind of again a global look at your programs that you accredit, do you generally feel really good about they are? Are there certain pockets in the United States that may need more programs, or you have high concentration in certain areas that may need less programs? Or what's your thinking on that and just the overall health of the programs as a whole?

DR. MARCOUX: I think there are
currently a number of rapidly developing programs in all areas. Physical therapy is viewed as a moneymaker. And so a lot of schools are adding it. A lot of universities and institutions are adding it.

I think there's always need for more programs in rural areas. And for example, the area in Boston, Massachusetts has eight currently DPT programs. And they probably could be, do with less.

So I don't think we have any control of it. But they're just -- I think we have, certainly have sufficient numbers at this point in spite of the U.S. Department of Labor and Statistics comments that we're the fast-growing and the needs are increasing. We seem to have plenty.

MEMBER WU: I see no other questions. I'll ask one. I have to say, of all the agencies that I've seen, I would characterize just from the numbers that you've shared you as impressively tough. I say that in a very
positive way.

I wonder if you might share, is that, this is intentional, just in who you turn down and not just in absolute number terms, but proportionally you seem to be maintaining some tough standards.

This follows up on what John noted. I wanted to give you a moment just to speak to that.

MS. WISE: Again, I think it's, excuse me, a pattern that the programs have shown over time, that they're able to maintain these high rates. And so it really isn't unexpected that the programs think they're too high because they're able to meet them.

And again, I have other numbers to show you that we're not seeing too many programs that fall below those rates that have to go on our continuous monitoring process. So that indicates to us that they're set right.

And then the feedback, you know, we get from, especially in the site visits from the
employers, the clinicians that are out there, the clinical sites, say the students are coming to them well-prepared. And they're highly employable. They're very skilled.

Again, that's an indication that what we've put into place, as CAPTE's put into place, is working.

The programs right now themselves, I will say there are some anecdotal talk of the employment rates, to go back to what we're doing and how many programs there are. So we may see some more noise around that at some point as the programs, new programs come onboard.

But so far we've been able to maintain that high quality. And we would really hope to be able to do that going forward.

DR. MARCOUX: I would just also add that, as a physical therapist, I think physical therapists by nature are relatively competitive. And so people want to be the best. And so they compete to be the best.

And so I think, you know, one of the
comments we received was that CAPTE's standards are minimum. And so out in the community I like to say they're not minimum, they're minimal. These are the minimal ones you can meet. But they're not minimal by any stretch of the imagination.

So I just think we're driven to be the best. And I think that's reflected by the programs.

MEMBER ETCHEMENDY: Frank, could I --

MEMBER WU: Yes, John.

MEMBER ETCHEMENDY: Following up on this, I think one of the things, one of the dangers of setting a very high graduation rate standard is that you worry that the programs are going to make it easy to get through. And so that was an initial worry I had.

But, of course, you have, you in addition have the licensure rate requirement and the employment rate requirement. And they're all very high.

And so I think that sort of
triumvirate is absolutely great. And, you know, I wish there's a way that we could apply that more broadly. But, of course, in many programs there's no licensure and so forth and so on. But that's great. So --

MEMBER WU: Okay. Thank you so much. And I think we now ask staff to come back and add any comments as needed.

MS. DAGGETT: I have no further comment.

MEMBER WU: Okay. Is there a motion?

MEMBER PRESSNELL: I would be happy to do that. The motion is to continue the agency's current recognition and require a compliance report in 12 months on issues identified in the staff report.

MEMBER ETCHEMENDY: I second.

MEMBER WU: Okay. The motion's been duly made and seconded. Discussion? Okay. Seeing no discussion, all in favor signify by raising your hands and keep them up till they've been counted by staff. Okay. Any opposed?
(Show of hands.)

MEMBER WU: Okay. I believe that ends our discussion of CAPTE. And we will summon our Chair back.

Let's take a five-minute break. I believe that is the end of business for the day. But it's not my prerogative to say that. So a five-minute break.

(Whereupon, the above-entitled matter went off the record at 3:31 p.m. and resumed at 3:34 p.m.)

CHAIRMAN KEISER: If I may, just to let you know, we are ahead by one agency. So tomorrow we hopefully will move the Friday agenda up till tomorrow afternoon and most probably will not have a meeting on Friday. So those of you who are planning to stay on Friday, you're able to go home. Go to your families.

I don't see the agenda tomorrow being really difficult. So we should be able to have the discussion on the proposals to the legislature by the end of the day. And if we
have to, we might just go a little over the 5:00, but we'll get it done.

(Off mic comments.)

CHAIRMAN KEISER: Tomorrow we have Middle States, New York Border Regions, and WASC. Three, we have three tomorrow. And we have a presentation on the student records in the morning for an hour. Okay.

Well, thank you all. We are adjourned. We're adjourned for today. See you tomorrow at 8:30.

(Whereupon, the above-entitled matter went off the record at 3:35 p.m.)