U.S. DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

NATIONAL ADVISORY COMMITTEE ON

INSTITUTIONAL QUALITY AND INTEGRITY

(NACIQI)

TUESDAY, MAY 22, 2017

8:30 a.m. – 3:50 p.m.

DOUBLE TREE BY HILTON WASHINGTON DC

CRYSTAL CITY

300 Army Navy Drive

Washington Ballroom

Arlington, VA 22202

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WELCOME AND INTRODUCTIONS

CHAIRMAN KEISER: Good morning everyone, welcome to the meeting of the National Advisory Committee on Institutional Quality and Integrity. I would be -- I would like to call this meeting to order and Jennifer?

MS. HONG: Good morning everybody. I'd like to welcome all the NACIQI members, the accrediting agencies and members of the public. This is the meeting of the National Advisory Committee on Institutional Quality and Integrity or NACIQI.

My name is Jennifer Hong and I'm the Executive Director and 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 or HEA and is also governed by provisions of the Federal Advisory Committee Act as amended or FACA which sets forth standards for the formation and use of advisory committees.

Sections 101C and 487C-4 of the HEA and Section 8016 of the Public Health Service Act 42 USC Section 2966 require the Secretary to publish lists of state approval agencies, nationally recognize 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 they accredit.

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

Further, in addition to these charges, NACIQI 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.

Thank you again for coming and with that I'm happy to hand it off to our very able Chairman, Art Keiser.

CHAIRMAN KEISER: I already started off incorrectly. Good morning everyone, welcome to our meeting. I would like at this time to have our Committee introduce ourselves to you and Rick would you start please?

MR. O'DONNELL: Rick O'Donnell, CEO of Skills Fund.

MR. JONES: Brian Jones, President of Strayer University.

MS. DERBY: Jill Derby, Senior Consultant with the Association of Governing Boards of Universities and Colleges.

MR. VAN AUSDLE: Steve Van Ausdle, President Emeritus, Walla Walla Community College.

MS. NEAL: Anne Neal, Senior Fellow American Council of Trustees and Alumni.

MR. FRENCH: George French, President, Miles College.

MR. BOUNDS: Herman Bounds, Director of the Accreditation Group at the U.S. Department of Education.

MS. HONG: Jennifer Hong, Executive Director and Designated Federal Official.

MR. KEISER: Arthur Keiser, Chancellor, Keiser University.

MR. WU: Frank Wu, Faculty, University of California.

MS. DERLIN: Bobbie Derlin, Associate Provost Emeritus, New Mexico State University.

MS. PHILLIPS: Susan Phillips, Faculty, University of Albany and Leadership Fellow to SUNY.

MR. WOLFF: Ralph Wolff, President of the Quality Assurance Commons.

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

MR. ETCHEMENDY: John Etchemendy, Faculty, Stanford.

MS. SULLIVAN: Kathleen Sullivan Alioto, working with the proprietary business to help parents and grandparents read, play and sing with their children ten minutes a day.

MR. BOEHME: Simon Boehme, Student Member.

MR. MULA: Chuck Mula, Department Staff. To my left is Miss Erin Dutton, she is a student guess of the Department staff and will be a junior in high school.

MS. LEFOR: Good morning Valerie Lefor, Department Staff.

MS. DAGGETT: Elizabeth Daggett, Department staff.

MS. MCKISSIC: Stephanie McKissic, Department staff.

MR. SMITH: George Smith, Department Staff.

MS. HARRIS: Dr. Nicole S. Harris, Department staff.

CHAIRMAN KEISER: Well thank you everyone and thank you for coming to this meeting here in Washington. We are -- we have one little change in the Agenda to start off with. Diane Auer Jones who was supposed to make a presentation first thing this morning will be with us after the ethic's discussion which will occur around 1:30 so we look forward to hearing from her but we are going to move on with the Agenda as set with her speaking to us later on in the afternoon.

We'd now -- I'd like to now introduce Brian Fu who is a Program and Management Analyst at the Office of Planning, Evaluation and Policy Development for a briefing on outcome measures which is a component of the U.S. Department of Education's Integrated Postsecondary Education Data System for inclusion in the Accreditor Dashboards, Brian? There he is -- welcome Brian.

BRIEFING ON OUTCOME MEASURES (OM) COMPONENT OF THE U.S. DEPARTMENT OF EDUCATION'S INTEGRATED POSTSECONDARY EDUCATION DATA SYSTEM (IPEDS) FOR INCLUSION

IN THE ACCREDITOR DASHBOARDS

MS. HONG: So we're going to cue the dashboards up, Patricia has them up so you'll notice that they have a different look to them and that we have added that component to the graduation rate section so Brian is here to explain some of the changes here, specifically the one on graduation rate and outcome measures.

MR. FU: Good morning everybody. I'm happy to be here. I'm part of the team that helps compile these data and present them to you. I'm assuming all the members are fairly familiar with the dashboard as we've done this a few times before so I'll -- as Jen indicated I'll just highlight some of the changes you might notice.

The dashboards that were circulated prior to the meeting include formatting changes, minor changes in data values as well as the addition of the outcome measures. The formatting changes are just that -- they are aesthetic changes. They're probably the biggest thing that you'll notice that has changed.

But the content and the data values are generally the same for -- for most of the dashboards. The minor data values that did change reflect the college scorecard changes in the most recently quarterly update.

That update was in March of 2018. Each fall college scorecard has sort of a major data update that takes all of its annual metrics and sort of updates them. In addition each quarter the college scorecard updates items for example from PEPS, including our institutional currently operating flag and accrediting agency designation.

Those these are relatively few changes that happened during the quarterly updates but you will see perhaps the minor changes in the total number of institutions that are reported on because some are no longer operating and for those institutions that do report different accrediting agencies from one quarter to another which is very few -- you will also see changes reflected there.

The more substantial change and the one that I would like to highlight today is the inclusion of outcome measures. This aims to address feedback about graduation rates used in prior accreditation dashboards. We have added -- I -- specifically we have added IPEDS outcome measures.

These are also included in the data files in the college scorecard so that's where the universe of institutions will come from. Previously the accreditation dashboard, as you all know, provided information that was derived primarily from the

IPEDS 150% graduation rates.

These rates as you know, described graduation outcomes only for first-time full-time students, and given your interest in understanding outcomes for a broader universe of students, including those who may have started, you know, as part-time students or transfer students, we've included these new outcome measures.

I'll briefly describe now the data generating process for IPEDS outcome measures and that started in the spring -- excuse me, in the 2015-16 IPEDS data collection year. And this comes from the survey component that's named outcome measures.

These data are reported by degree granting institutions and degree certificate -- degree or certificate seeking undergraduate students who are not only first-time, full-time students but also are part-time and non-first-time students.

The current accreditation dashboards provide outcome measures data from the IPEDS '16-'17 data collection year which is the most recently available. The outcome measures component collects award and enrollment data from degree granting institutions and four undergraduate cohorts at two points in time.

The first point is at 6 years and then also at 8 years. The four cohorts of degree and certificate seeking studies are the four permutations of first-time and full-time, specifically first-time full-time, part-time first-time, full-time not-first-time, part-time not-first time.

For each of the four cohorts IPEDS collects awarded students so we can think about us as sort of the graduation rate -- 6 and 8 years after entering. In addition for 8 years after entering the following additional outcomes for those who did not receive an award are reported on.

One -- still enrolled so did not graduate but still enrolled. Subsequently enrolled at another institution so a/k/a transfer and an unknown status which just means the institution does not know where the student has gone but is no longer enrolled in the institution.

All reporting institutions for this particular presentation is the 2008 cohort with 6 year status as of August 31st, 2017 and the 8 year status as of August 31st, 2016. The accreditation dashboard presents the distribution of institutions using a combined graduation and transfer rate.

The combined rate represents the sum of graduation and transfer percentages in each sub cohort aggregated to a

combined cohort by calculating the weighted average across all four sub cohorts. So we're only presenting one number in large part because it's easier to present on a dashboard like this for real estate purposes but I think this is -- this is the one measure that we're presenting here and we'd love to get your feedback on if that makes sense or if you'd like to see it in a different way or if you'd like to see more dis-aggregations of it.

A couple key notes on the dashboard. Since outcome measures are not calculated for non-degree granting institutions some institutions do not have an associated value for this metric. In addition for institutions that report separately for branch campuses this may exclude information from campuses that do not award degrees.

So just by comparison the coverage of the 150% graduation rates for the accreditation dashboard, universe of institutions is about 4,700 out of 5,200 institutions examined so we have better coverage for that metric. In comparison about 3,300 institutions had relevant outcome measures data.

So while it provides more information on specific outcomes it has less coverage. In looking at what we've presented which is the graduation plus transfer outcome measures, 8 years after, we find that these measures are highly correlated with 150%

first-time, full-time graduation rates.

The correlation coefficient is about 0.65 which indicates there is an association intuitively between the two metrics. The median different for institutions -- that is the difference between sort of the graduation plus transfer rate minus the 150% graduation rate was approximately 25 percentage points so you could -- you could see that happening for a couple of reasons.

One, there's more time to graduate plus transfers count sort of as a positive income. As expected, sort of intuitively the category with the highest difference was public institutions that predominantly award associate degrees. Those institutions had a difference more in the mid 30's in terms of graduation rates being -- graduation plus transfer rate being higher than the 150% graduation rate.

For profit institutions that predominantly award Associate Degrees and certificates had the lowest differences, probably so. The outcome measures displayed in the accreditation dashboards again represent those data collected in '16-'17 data collection year.

I will note, just for future reference, that for all degree-granting institutions there are four new reporting categories

in ’17-’18. They include dis-aggregations by Powell and some other items that we will consider moving forward.

That’s a brief overview of the changes to the dashboards. As you can see on the screen this is one of the presentations that we have and the new outcome measures is on the lower left-hand corner, not all the way on the corner but sort of between the graduation rate and I believe earnings.

We do have the raw data that generates these data by institution and accrediting agency. You can find those online. So those are the major changes to the dashboards. I’m happy to answer any questions related to those changes.

CHAIRMAN KEISER: I have Ralph, Claude and Anne.

MR. WOLFF: Thank you for the presentation. Can I ask a few questions? One, on the dashboard where you have schools by graduation rate, transfer rate -- is that 6 year or 8 year?

MR. FU: So the graduate plus transfer rate is an 8 year after initial enrollment.

MR. WOLFF: And the first one of the schools by graduation rate would be 6 year?

MR. FU: Well it depends on the type of institution and the type of student. So it’s 150% of -- normal time.

MR. WOLFF: I'm sorry, 150 versus 200% I think would be the better way of stating that right?

MR. FU: I think you have four year schools in mind perhaps, but if you can imagine if you were in a 2-year program 150% would be three years.

MR. WOLFF: Right.

MR. FU: Does that make sense?

MR. WOLFF: We've heard and my question is with this new data I mean one of the things we've heard in previous sessions before the outcomes measures were included was that it didn't capture accurately transfer and non-first fall enrollment full-time students.

So if we were to rely on these completion rates is this now dis-aggregated by -- its' available dis-aggregated by institution so that institutions would have access to this information. They would know how you're calculating their rate and they were trying to figure out how we can do our job with regional accreditors to say what percentage or -- not regional but all accreditors, institutional -- how are they doing with respect to more comprehensive data?

Because we were constantly hearing that the low performing institutions weren't capturing the right category of

students. So do we now have the proper universe to work with the data -- I hope I'm making sense here?

MR. FU: If I understand your question there's -- there's a couple of parts. One was the quality -- data quality aspect and one was sort of the delegation --

MR. WOLFF: Well let me try it again and say that we've often heard that some of the institutions have had the lowest completion rate really were not full-time institutions. I know of many that for example had primarily part-time students, adult learners, et cetera.

So it would seem that the new outcomes measures would capture the data for those institutions even if they only had a 5% full-time enrollment, first-time but 90% or more part-time transferred in et cetera, so that now we would have data that those institutions would have more accurate reporting.

MR. FU: Yes, so the outcome measures includes all sort of four permutations of the first-time and full-time taxies.

MR. WOLFF: And so then on the transfer issue you have transfer-out and you have transfer-in. So you have institutions that lose students by transfer and then you have other institutions that are transfer-in. So our both sides being captured?

MR. FU: So sort of on the -- on the front end from

a student's perspective -- a transfer-in student is just a student that's included in the cohort, the beginning cohort. There'd be either a -- there'd be either a full-time not-first-time student or there'd be a part-time not-part-time-first student so entering into that cohort that's where they would be counted.

Whatever, if they subsequently transferred then they would be counted as an outcome transferring out assuming that they did not. So graduation or an award so of trumps all if they had a prior -- whether they transfer or not if they graduated at the original institution for which data are reported for we would get -- we would count them in that percentage.

And if they transferred out it doesn't matter where they came from they would be -- they would be counted in that way. And sorry I mumbled that a little bit together but did you get that point, okay?

MR. WOLFF: I think I got that. And then my last question is does the scorecard now have this updated data so by institution you actually would see the more comprehensive data than just the traditional old IPED full-time-first fall enrollment?

So if we would go to the scorecard and look at completion rates would it have the outcomes measures included?

MR. FU: So there are two components of college

scorecard. One component is the consumer tool which a lot of -- which is targeted at, you know, students and families. Outcome measures is not currently showing on that particular product however there are back-end data that includes sort of nearly -- I think over 1,700 data variables and we've included outcome -- the raw data for the outcome measures for you know, developers and other types of researchers so that they can include that in their college scorecard analysis.

MR. PRESSNELL: It's really early in the morning and not enough coffee to get everything rolling like I need it to roll. And Ralph asked a number of the questions I was kind of interested in. So the -- just to repeat the graduation rate is a -- is it a -- it includes all of those different categories right -- so first-time full-time freshman but in-transfers so not first-time and so forth, is that correct? So this is an aggregated rate?

MR. FU: Right and so the old one which we've capped which is the 150% graduation rate.

MR. PRESSNELL: Yeah.

MR. FU: That's first-time full-time only and that's the one that you've had previously. What's new is that the graduation rate plus the transfer rate and that is a roll-up. It's a weighted average of all those sub-cohorts so all of those different

types of students are represented in that cohort.

MR. PRESSNELL: So, the graduation plus transfer rate is really the one that probably is more accurate of a diverse population on a campus versus the first-time full-time? Depending on institutional type I realize that --

MR. FU: Yeah, I would say it would have more coverage of the different -- more representative of the different types of students at an institution.

MR. PRESSNELL: And so data sources again for -- because we were talking about the in and out transfer, you know, so somehow we're capturing successful transfer outs and how are we capturing that?

MR. FU: That's a great question and so IPEDS is -- as you know, all institution reported data. So there are limitations for institutions that have more limited information about what happens to their students afterwards but it is institution reported so the institution would have to know what happened to that student.

MR. PRESSNELL: So this is still single sourced out of IPEDS, all of this analysis?

MR. FU: Correct. So theoretically you could think of the transfer rate as a lower bound for institutions that don't know all of the students that end up transferring.

MR. PRESSNELL: Okay and the schools by title -- is this supposed to be Title IV volume instead of Title V volume in the Title IV-A that we're looking at?

MR. FU: Correct, I apologize if there's something that says Title 5-A, you know we'll --

MR. PRESSNELL: I just want to make sure I was -

MR FU: Yeah.

MR. PRESSNELL: Thank you.

CHAIRMAN KEISER: If I may ask a question first. Help me understand when we were reviewing a regional accreditor we're looking at a much more diverse group of institutions. If I look at it correctly it's almost 60-70% Baccalaureate programs and 40% 2-year programs. And the national accreditors were looking at approximately 90-some percent 2-year programs.

Is it to our advantage to look at that blended graduation rate and those blended numbers because they're dealing with two different types of populations?

MR. FU: If I understand your question it's sort of guidance on interpreting these data, particularly for accreditation.

CHAIRMAN KEISER: That's our job.

MR. FU: I will say this that you know, we have

frequencies that fall into certain categories and that if it's helpful you know, we could look at sort of more complex presentations of this that would break out different groups of institutions. You'd have a lot more paper to look at but you know, let us know in terms of feedback if that would be more helpful rather than a blended perspective.

CHAIRMAN KEISER: But in terms of the regionals when you look at there are 1,100 4-year not for profit institutions which tend to have maybe a little more elite students, it tends to blend the data so the graduation rates may or may not -- I'm not sure maybe it doesn't make a difference, but could change the data and kind of whether it would make the 2-year institutions look better or for that matter the 4-year institutions look worse.

MR. FU: I think that's a fair point and I think what you're sort of alluding to is sort of institutional or student characteristics that influence metrics and it's very hard to isolate these things. I mean we could, you know, people have tried and some -- there's different, there's a diverse sort of opinion poll about what ways to do that are better or worse.

And, you know, there's talk about sort of this value added or in sort of the most complex level, you know, preparing

expected value or a metric versus the actual for different types of institutions. So I think it's a fair point, I think it's a -- it's a complex issue to try to isolate what specifically factors are contributing to what we see in the outcome measures.

I just would say that you know, we can provide more complicated models. The purpose of the presentation now is to sort of give a simple look of frequencies. Some people might interpret this as a way to identify, you know, sort of the lowest performers -- maybe that's a presentation optimized for that.

But a presentation that's optimized to sort of incorporate all of the institutional institute and characteristics would be a more complicated way to present things to you and we can look at those ways if that's helpful -- but we acknowledge that those factors do contribute to metrics to your point.

CHAIRMAN KEISER: I have got to just harken back to Simon's discussion a couple of meetings ago where one accreditor had, you know, some really low -- low outcomes for some of the schools in their sector. Their Agency had some very low outcomes and yet at the same time they had schools with extraordinarily high outcomes and I think it's our job to measure whether they're doing their job effectively and if they're only doing it for a certain part of their schools rather than all of their

schools it's hard for us to make that evaluation on using a blended database.

So Katrhleen you might want to turn your think off.

MS. ALIOTO: Oops, sorry.

CHAIRMAN KEISER: Thank you, any further questions -- Ralph?

MR. WOLFF: Thanks, again as I -- a couple more questions. The number of schools listed by graduation rate is around 3,000 versus the Title IV by volume is significantly higher. So please explain the difference between the end for one and the other?

MR. FU: Sure, so for the graduation and transfer -- plus transfer rate that is -- oh IPEDS only collects those data for degree granting institutions.

MR. WOLFF: Okay, got it.

MR. FU: As part of their collection.

MR. WOLFF: Now looking at the comparison between the graduation rate which lists 484 institutions below 20% and the graduation plus transfer rate which has a non-enumerated below 20%. One would draw the conclusion that when you really include these outcome measures the completion rates are substantially higher and a substantial increase in those over 60 to

80% completion.

So is that a fair conclusion that using these outcomes measures the completion rates, particularly of the lowest performing institutions that we have hammered on and public -- you know, many senators have really challenged and the like. It seems like it's less of a crisis or less of an issue.

And I'm just trying to understand the data which seems to suggest that if you include the transfer rate those below 20% are really a very small number -- is that a fair conclusion?

MR. FU: I'm amiss to conclude -- to make broad conclusions like that but I will say that you know, intuitively the graduation plus transfer rates should be higher for a couple of reasons -- one is they had more time and one you have the transfer outcomes.

So I -- you know as I mentioned earlier I haven't looked at the distributions -- sort of the gaps by low end and high end but you know, as I mentioned before I believe the median difference between the graduation plus transfer rate minus sort of the 150% graduation rate which is a different population is roughly, you know, 25 percentage points lower.

So to your point that's -- you know, that's consistent with what you're saying but I'm reluctant to make any

conclusions beyond that.

CHAIRMAN KEISER: Okay, John?

MR. ETCHEMENDY: So I mean these are -- this measure is sort of an agglomeration of a lot of different things and it's going to be misleading on both ends for certain institutions. And if you -- for example, if you have a lot of incoming transfers -- suppose they're transferring after their second year at our -- at our community college into Cal State, then you would expect that they would graduate much faster than 6 years or 8 years and but similarly -- so, so the measuring for that long of a period is going to naturally give you a very high rate because you're giving them a lot more time.

They should really be graduating in two more years or maybe three. So you have the other problem with part-time students. With part-time students, if you're a 50% times student, then graduating in 8 years is more like 100% rate -- that is to say 100% time rate because you would expect taking courses at a half time then that should take you 8 years.

And to get the equivalent of the 150 you should be looking at something more like, you know, 12 years. So throwing them all together is an agglomeration that's going to have all kinds of weird effects when you have different institutions of different

types and the proportion of those different institutions.

Nonetheless, it gives you some kind of a measure and if you take it with a grain of salt and it should be taken with some big grains of salt, then it can tell you something. Now I don't particularly think it's the best approach but it is an improvement so thank you.

MR. BOEHME: Thank you Mr. Chair. I echo a lot of statements made by Ralph and John and you as well about our pursuit of trying to find a better data and thank you to the Department for finding this as a priority. Our job and the work we do is better when we have more complete information and I have at times really relied on the dashboard for better or for worse and been accused of pulling too many conclusions from first-time full-time and understandably it is extremely limited data and so I think this new completion rate and looking at different factors is really valuable.

What would you view is the next iteration in terms of looking at the completion rate? Maybe it's the Department's perspective, maybe it's professionally from your own opinion, where do you view or what kind of data points would you like to see more of or see in its next iteration aside from this?

MR. FU: I think that's a good question and one

thing that I alluded to sort of at the end of my remarks was that we will have more dis-aggregation specifically by socio-economic sort of to Arthur's point I think we'll have opportunities to look at those data in that way and that's what I would be most curious about personally.

CHAIRMAN KEISER: Frank?

MR. WU: This data is complicated. I was wondering where do you explain for the average user who's not immersed in this how to read it or do you not do that? And maybe it's too complicated and too many judgment calls for you to explain so I'm just curious how can we help the public and others who might want to poke around and look at this?

How can we help them as they're looking at raw numbers interpret it in an appropriate way?

MR. FU: That's a great question. For purposes of this presentation our goal was to simplify it into sort of one graphic -- sort of on the bottom left. And we thought that it might be easiest to explain by combining so by combining both different outcomes in that it includes both graduation and transfer and also by rolling up all the sub-cohorts.

So in plain English what I would interpret this as is all incoming students in 2008 sort of what happened, you know,

where were they 8 years later? You know, and I would highlight the caveats, you know, if you had, you know, the time or space on a page to do it that sort of John and others have identified such as well when we say all incoming students we also mean those who transferred. They might have transferred as juniors but we mean for all those students that started in 2008 where are they now, 8 years later?

MR. WU: So I just want to comment you. I love data. I think we should all love data. This is good, it's great you're doing this. It's constantly improving. I just want to mention I do have a fear though as these numbers go out in the wild that all sorts of mischief will come of this as people with their own agendas want to exaggerate what you can discern from this set of data.

So it's just a note -- we have to be cautious but this is great. Glad you're here, hope you come every time and show us this stuff.

CHAIRMAN KEISER: Anne -- Jennifer do you want to go first?

MS. HONG: Just real quick and just to draw your attention to there is also a "read me" that explains each metric and the data source and a cheat sheet that prefaced, also for the public,

that preface the dashboards. So there's a read me and a cheat sheet so I encourage you to go look at it as you look at the dashboards.

CHAIRMAN KEISER: Anne?

MS. NEAL: I just want to follow-up a little bit on Frank's -- I appreciate the efforts to give us correct data and we all know that the first-time full-time has not been entirely accurate. But we also know that the rates that we're seeing for first-time full-time are terrible and I guess my fear as I look at this effort to give us more correct data is it leaves us with the assumption that 8 year graduation rates are a standard that we should aspire to for a 4 year college degree and I think that's unfortunate.

CHAIRMAN KEISER: Kathleen?

MS. ALIOTO: While I would agree with Anne on that I think that as I moaned about before there seems to be within the Department a certain bias toward community colleges and the 2-year community college since the number s are that 38% of students attend community colleges -- only 24% are full-time and the -- at this point full-time community college students graduate at a rate of 57% within 6 years.

So community college students who are the ones because of economic factors who are most likely to be under duress are still graduating according to this study within 6 years

but not within 3 years.

So to use the matrix of 3 years to judge the quality of the community college is not correct and I wish we'd stop doing that.

MS. HONG: Can I just to Anne's point -- we didn't publish the OM measures -- the 8 year graduation rate as a statement of it being aspirational. We actually were trying to get to Kathleen's point with regard to community colleges to get a handle on transfer rates and the transfer rates are only collected with an 8 year graduation rate, is that right Brian?

MR. FU: Yes so there are two measurement periods for the outcome measures that we have access to and you know, and IPEDS is its own process that, you know, includes several technical review panels and several iterations of public comment to get where we are.

But where we are is what data we have and the two measurement periods are the 6 and the 8 years after. Unfortunately the 6 year rates only include the awarded -- the completion rate, it does not include the other three outcomes including the transfer, the still enrolled and the unknown outcomes.

So that's why you'll see the graduation and transfer rate reported at that 8 year measurement time.

CHAIRMAN KEISER: That raises a question for me. So a student drops out of a community college or any school, take a year or two off, goes back to school and completes -- that original school gets the value of a completer?

MR. FU: Are you saying someone who --

CHAIRMAN KEISER: Because if you have 8 years for a student who let's say starts at a community college, they leave the community college and fail -- I'm not sure that's the right term but doesn't complete the community college, but then spends a couple of years because 8 years is a long time, then goes to another school and finishes -- does that make the community college under the transfer a successful completer?

MR. FU: No, that student -- the first institution is lost and then that student will appear in the -- in the part-time not first-time rate for the second institution and so it gets counted for the second institution, it does not get counted for the first institution. At least that's how this works. I'm not saying that's the right way, but.

CHAIRMAN KEISER: So a transfer for a community college student is the person who has successfully completed their degree and moved to another institution?

MR. FU: No, that's --

CHAIRMAN KEISER: I'm sorry I'm confused with the word transfer.

MR. FU: Transfer is transfer without prior completion at the original institution for which the data are reported for.

MR. ETCHEMENDY: And one thing you're noticing is that the transfer -- that just means the person successfully left and enrolled somewhere else. It doesn't mean they ever finished. So one of the quirks about this and there are many, many quirks about this.

But one of the quirks is that you get credit for any student that you can say, "Oh, yes, that student left but enrolled in some other college." And then you get full credit as if it's a graduation.

MR. VAN AUSDLE: John I think that's true with the new category we put in here of transfer but I think when you just look at what's going on on the campuses we have many individuals that have come to a community college and it's not in their best interest to stay and get the associate degree.

They might want a year and a half of education and then go to Stanford, that's the right path for them. But that community college doesn't get part of the credit that Stanford's

getting when they complete and go into the work force.

And I guess the question is do you have measures, or can you get measures that show the credits earned at the community colleges at the various 4-year colleges and universities so we can see in kind of a pathway format what the contributions are aggregately of the community colleges and the 4-year colleges and universities.

At the end of the day what we want to see is higher graduation rates for these 15,769 institutions that you are tracking I think. But I think a policy question we're facing with is -- what is the overall contribution of a community college?

I got involved with the AACJC here just a few years ago where we were looking at very dismal transfer rates. I mean it was no reflection of what was going on on many of the campuses, it was such an understatement.

And I applaud you for putting the transfer piece in here but I think as a group we're really faced with measuring student achievement and we need information and we're expecting our agencies to work with institutions to get supplemental information to IPEDS.

So I guess the question is as you look to the future can we -- can you for different categories of institutions say what --

you'd probably have to look at the 4-year and say what was their percentage of credits awarded within that degree transferred in?

MR. FU: Thanks for the question. I think using -- based on currently data available to us now -- sort of this percentage of credits towards a subsequent graduation at a different institution we don't have those data to answer these questions -- accurate data.

I will say that the college scorecard does provide in its back-end database which is not on the consumer profile. We do calculate graduation rate that includes several categories of outcomes -- I think 13 outcomes all together and those outcomes include transfer to a 2-year school with a subsequent graduation, transfer to a 4-year school with a subsequent withdraw, et cetera.

We've noted in our documentation to those data that there are limitations, particularly because these data were derived from NSLDS and there were reporting issues with sometimes graduations reported as withdraws and vice-versa. But we believe that over time these will be improved.

I think there is a "Dear Colleague" letter that went out a few years ago that will correct it since this is a retroactive type of metric, it will take some time for us to smooth that out but that's sort of something that's promising, that doesn't address your

concern directly but it is most related, I think, in terms of what's possible in the near future.

MR. WU: So I'm not sure if this is a question for Mr. Fu or for someone else but I'm just wondering -- the way all of this is set up is it set up by statute, by regulation, by the Department, by NACIQI -- there's a reason I ask that which is this input will it change the way this data is presented?

Because it seems as if you're constantly improving so again this is praise, but who decides how this data is presented? Is it Mr. Fu and his office decides this -- which isn't a bad thing, it means you can adapt and take these comments so I'm just wondering where is it set forth how this data will be categorized, compiled, presented and what exactly is being measured because if you can use this feedback then we should give more feedback.

But if it's set by statute or regulation and what we say doesn't matter then that will alter the way we think about it here.

MS. HONG: Well I'll try and answer the front part of that. Basically we -- if you're talking about the dashboards, we developed the dashboards with the metrics that the committee identified a few meetings back.

MR. WU: So we -- so this is good. What this

means is we can offer input and you can change it.

MS. HONG: Right but we're limited in terms of the data sources that we have available to us so we have IPEDS, we have scorecard, so those are the data sources that we draw upon to get you what you want in the most digestible way.

MR. WU: Thanks, that's a great answer because that suggests if we think IPEDS is bad which I think a lot of people in the world think -- it's just not optimal. We, NACIQI, can't change IPEDS -- that's set in some statute. So somebody -- Congress, has to change the way IPEDS is set up -- would that be right or can the Department change IPEDS?

MR. FU: So changes to IPEDS do occur but it's a fairly lengthy process that's -- I don't think Congress, well I'll just say that it goes through a series of technical review panel meetings and several series of public comment periods through the Federal Register.

So those types of changes are -- are -- have a lengthy and complicated process at best that we could to our best ability we can sort of relay sort of these concerns to the folks that are sort of in charge of that at NCS, but it's sort of a lengthy process.

And I don't -- I can't comment on how much we

can influence them but they are listening to the general public, not only this Committee, but other researchers and other institutional accountability type of organizations and what they add and what they don't add.

MR. WU: So for anyone in the room including members of NACIQI, if our appetite for this is not satisfied by what NACIQI does, we should get ourselves appointed to the Technical Review Commission for IPEDS right? So if someone such as Simon were especially interested that's the place to go to really shake up the data right?

MR. BOEHM: Please let them know my time at NACIQI is wrapping up so.

MS. HONG: I just want to add that the production of these dashboards -- it's a pretty heavy lift conducted by a very skinny staff would you agree with that Brian? So I'm very appreciative that we've been able to keep this ongoing and that is just dependent on the availability of the resources so it is a heavy lift and it's done by some very hardworking folks at the Department and I'm grateful that we have those resources available to us now, but I don't know, you know, we're doing it as best as we can so a big thank you to Brian and his staff.

CHAIRMAN KEISER: Claude and then maybe

wrap it up.

MR. PRESSNELL: Yeah, and I think what you're doing is great and especially with the resources you have available. But I think that as a Committee we need to realize that the data are not going to thread all the needles well period.

And one thing we don't and we cannot take into account is student behavior and student life experiences. We cannot take those into account. So yeah, you would think you're looking at a 4-year institution, a 4-year graduation rate ought to be exceptionally high.

But, you know, I work with 34 member institutions and I can tell you Sewanee Roads and Vanderbilt it's exceptionally high because the student population that they have and what their intention is. So no matter how good the data are we're not going to be able to thread that needle exceptionally well.

And so what we will need to do or what I believe is my desire on NACIQI is to make sure that accrediting bodies are working with institutions to remove every barrier possible so students can be successful in what it is they want to be successful in.

Some community colleges all they want is two courses -- they're coming in to take these two courses and they're

out. Now part of the problem is that in order to get student aid for that they have to declare themselves as a degree-seeking student. It's a false positive there. They never intended that. And so you've got all of these things going on in order to -- in order to be successful that -- and there are some, you know, students who go to 4-year institutions.

I've got a lot of 4-year institutions that serve first generation low-income students and adults, both typically high-risk students and they do the best they can to get them through but the thing is the institution cannot remove every personal barrier, but they need to find out what barriers they have and get those eliminated so that they can perform well and so the student is successful.

And we want the accreditors to assist those institutions to facilitate their members to make sure those barriers are reduced. But the point being is that no matter how good the data are and I kind of like broadening the definition of success to be graduation currently enrolled in transfer, but will never be able to accurately get it according to what the student experience is.

CHAIRMAN KEISER: Thank you very much for your presentation. It certainly elicited a lot of response from the Committee so we look forward to having you back.

MR. FU: In closing I just want, you know, if there are other points of feedback, you know, of how this could -- you would like to see this done differently feel free to get back to us through Jen and others. And also just a word of sort of different ways you can look at these data and how you use them -- I just think very broadly about how you would do that.

For example is this a conversation starter -- like this is the ability to let's look at some specific institutions within an accreditor or is this sort of just, you know, a summit of things -- I'll defer to you on how to use this but it's a tool in the tool box and it's not -- it's not necessarily a Swiss army knife that does all the things but it does do some things and it will be up to you guys to use that appropriately so thank you.

CHAIRMAN KEISER: Again thank you very, very much, excellent presentation. We now move to the Consent Agenda.

CONSENT AGENDA

CHAIRMAN KEISER: We have three institutions that are currently on the Consent Agenda. The American Osteopathic Association, Commission on Osteopathic College Accreditation (AOACOCA), the American Psychological Association Commission on Accreditation (APA), the

Transnational Association of Christian Colleges, Schools and Accreditation Commission (TRACS).

Are there any recusals in the group on these three institutions or agencies -- recused from APA okay. How do we do that? Does he walk out on this one just so we can consent? Are there any third-party -- any third-party presenters on any of those three Agencies? Sensing none, does any member of the Commission prefer to remove either of these three institutions from the Agenda?

Then I would entertain a Motion to move the Consent Agenda?

MR. BOEHME: I'll make the Motion.

CHAIRMAN KEISER: The Motion is made by Simon and is seconded by Ralph. All in favor of -- any further discussion -- all in favor of the Motion signify by raising your hand -- all those opposed. Okay, we're out of the Consent Agenda. Whoever is part of that group -- congratulations.

STANDARD REVIEW PROCEDURES

Okay now we're going to talk, we're going to go into our regular review of agencies. The process is that we start with the Primary Readers, introduce the Agency's application. After that the Department staff provides a briefing to the

Committee regarding the Agency. At that point we ask the Agency's representatives to provide comments to the Committee.

Then we, as the Primary Readers will ask questions of the Agencies to include the standard questions adopted by NACIQI for initial and renewal applications. With that the rest of NACIQI will ask for questions as which point we will ask for a response or comments from the Agency.

Then we will ask for third-party comments if there are any and this next Agency will have third-party commenters. The Department staff will respond to the Agency and third-party comments. Then we will have a discussion, a vote and a final set of questions on improving institutional program quality for initial review applications.

So that's our process.

RENEWAL OF RECOGNITION

ACADEMY OF NUTRITION AND DIETETICS, ACCREDITATION COUNCIL FOR EDUCATION IN NUTRITION AND DIETETICS (ACEND)

CHAIRMAN KEISER: Our first agency is, the Academy of Nutrition and Dietetics, Accreditation Council for Education in Nutrition and Dietetics (ACEND). Are there any recusals from ACEND? Sensing none, I'd now like to introduce

our Department Staff, Nicole Harris to present this Agency to us or I'm sorry, the Primary Readers, Jill or Richard O'Donnell, Jill?

MS. DERBY: So the Academy of Nutrition and Dietetics Accreditation Council for Education in Nutrition and Dietetics (ACEND) accredits Dietetic and coordinated programs in Dietetics in both the undergraduate and graduate levels, Dietetic internships at the post-Baccalaureate level and Dietetic Technician programs at the Associate Degree level.

Accreditation of these programs extends to distance education. As of the date of the renewal petition submission ACEND accredited 60 coordinated programs, 223 didactic programs, 248 post-Baccalaureate Dietetic Internships and 42 Dietetic Technician programs.

Recognition history -- the American Dietetic Association was first listed in 1974 as the accrediting Agency for Dietetic internships and coordinated programs in Dietetics. In 1995 the ADA established the Commission on Accreditation approval for dietetic education as its accrediting unit.

In 1999 the CAADE Consolidated Accreditation and Approval Progress and became the Commission on Accreditation for Dietetics Education. And in January of 2012, the Academy and the Commission changed their names to the current

1 Academy of Nutrition and Dietetics and the Accreditation Council
2 for Education in Nutrition and Dietetics.
3 ACEND was last reviewed for recognition in
4 December, 2012. At that time the senior Department official
5 required the Agency to come into compliance within 12 months
6 and submit a compliance report that demonstrates the Agency's
7 compliance with the issues identified in the staff analysis.
8 The Agency's compliance report submission was
9 reviewed in the fall of 2014 at the NACIQI meeting which resulted
10 in the Agency's continued recognition for a period of three years.
11 The Agency review for continued recognition is the subject to this
12 analysis.
13 CHAIRMAN KEISER: Thank you Jill, Nicole?
14 MS. HARRIS: Good morning Mr. Chair and
15 members of the Committee. For the record my name is Dr. Nicole
16 S. Harris and I will be presenting information regarding the
17 renewal petition submitted by the Academy of Nutrition and
18 Dietetics Accreditation Council for Education in Nutrition and
19 Dietetics also referred to as ACEND or the Agency.
20 The staff recommendation to the senior Department
21 official is to renew the Agency's recognition for five years. The
22 staff recommendation is based upon my review of the Agency's

renewal petition, additional information requested, complaint response and supporting documentation as well as observations of multiple program site visits conducted by the Agency in April, 2018 and an ACEND Board meeting in June of 2017.

During the current accreditation cycle the Department received one third-party comment regarding 60214 Separate and Independent, 602.21 C Review of Standards and one complaint in which the Department reviewed and found the Agency needed to strengthen its memorandum of understanding with the Academy of Nutrition and Dietetics to clearly identify ACEND as solely and independently responsible for making or ratifying accreditation decisions.

The Agency revised its MOU and was granted continued recognition by the SDO in spring of 2014. Therefore and as I stated previously the staff recommendation to the senior Department official is to renew the Agency's recognition for five years.

There are Agency representatives present today and we will be happy to answer the Committee's questions. This concludes my report, thank you for your time.

CHAIRMAN KEISER: Thank you very much. May I call the Agency representatives to come forward please.

There's a microphone on the side there you may want to pull over.

Welcome, please introduce yourselves.

MS. EASTMAN: Yes sir, distinguished Chairman and distinguished members of the NACIQI -- I tend to eat the microphone. We thank you for this opportunity to speak on behalf of the Accreditation Council for Education in Nutrition and Dietetics or ACEND.

My name is Dr. Wanda Eastman and I am the current Chair of the ACEND Board and I'm also a Professor Emeritus from New Mexico State University. I'd like to introduce my colleagues as well. To my right is Dr. Mary Gregoire. She is the Executive Director for ACEND and to my left is Mary Ann Taccona and she is the Associated Executive Director for ACEND.

I recognize and thank our two NACIQI Primary Readers, Dr. Derby and Mr. O'Donnell. We appreciate the work you have put into our Agency's review. I also recognize and thank Dr. Nichole Harris who's been our staff analysis from the Department.

Her assistance during the development of our petition, her thorough review of our petition, for her attendance at our Board meeting, and her attendance at three of our site visits, her guidance and insights were invaluable during the process, so

thank you Dr. Harris.

ACEND has been recognized by the U.S. Department of Education since 1974. Although legally a component of the Academy of Nutrition and Dietetics Corporation, ACEND has been recognized by the USDE under a waiver of a separate and independent criteria as specified in our policies and procedures and as detailed in our memorandum of understanding with the Academy, ACEND functions autonomously from the Academy in our accreditation decision-making, budget management and personnel decisions.

ACEND is committed to our mission of ensuring the quality of nutrition and dietetics education. Our ACEND Board currently includes 14 voting members, 9 of which are educators, preceptors or administrators who represent the various program types that we accredit.

Two are non-educator practitioner members, two are public members and one is a student member. Our program representatives, practitioner members and student member serve a non-voting elect member status during their first year on the Board and we currently have three elect members on the Board.

Dr. Nichole Harris as she has indicated, ACEND accredits 42 dietetic technician programs at the Associate Degree

level. At the undergraduate and graduate level we accredit 223 didactic and 60 coordinated programs.

In addition ACEND accredits 248 dietetic internships at the post-Baccalaureate level of which 91 are stand-alone dietetic internship programs that are eligible to participate in Title IV funding. Currently none of these 91 internship programs actually use ACEND as a gatekeeper for Title IV funding.

More than 21,000 students nationwide are enrolled in our programs this past year. The United States Bureau of Labor Statistics reports the job market for dieticians and nutritionists is very strong. The Bureau of Labor Statistics projects that employment of dieticians and nutritionists will grow 15% during the years 2016 to 2026, much faster than the average for all occupations.

Effective January the 1st, 2024, the Commission on Dietetic Registration which itself is an autonomous Agency, which credentials nutrition and dietetics practitioners, both registered dieticians, nutritionists and dietetic technicians has announced a change in the eligibility requirements for the credentialing exam to become a registered dietician nutritionist.

After January the 1st, 2024, applicants will need to have a minimum of a Master's Degree to sit for the RDN exam.

Since ACEND's last petition, ACEND has taken approximately 1,400 accreditation actions. ACEND granted candidacy to 36 programs, denied full accreditation to one program, granted initial or continued full accreditation after a site visit to 253 programs, placed 28 programs on probation and when programs were not able to come into compliance it has withdrawn accreditation from two programs.

In addition, 27 programs have submitted plans to voluntarily close. Our data indicate that the primary reason for probation or withdrawal of accreditation is program failure to document compliance with the credentialing exam pass rate targets and an inability to make program improvements needed to improve program outcomes.

In the 2012 standards ACEND established targets for both the first-time pass rate on the national credentialing exam and pass rates within one year of the first attempt and averaged the result over a 5-year period. The target is 80% pass rate for dietician nutritionists and 70% for nutrition and dietetics technicians.

Based on input from stakeholders ACEND modified the target for pass rate in the 2017 standards. The focus is now only on the pass rate within one year of the first attempt. And we

also average the pass rate now on a 3-year rolling average rather than a 5-year average.

ACEND reviews and receives reports each spring from the Commission on Dietetic Registration, again that autonomous agency for credentialing that administers the registration exams. These reports are on the pass rate proponents of graduates of each of the ACEND accredited programs.

The ACEND Board places programs that have pass rates below the ACEND target on the compliance timeframe as required by U.S. Department of Education and also our ACEND policies.

These programs are then closely monitored by the Board. Results of the most recent pass rate report indicate that 97% of the programs preparing dietician nutritionist met the pass rate target of 80% and 75% of the nutrition and dietetics technical programs met the pass rate target of 70%.

ACEND collects data annually on the completion of programs, with the release of the 2017 standards, ACEND set a target of 80% completion within 150% of program length. The past year's data indicate that 98% of the programs had completion rates at 80% or higher.

At risk programs -- those programs that are not in

compliance with one or more ACEND standards are given shortened accreditation terms. They are monitored through increased reporting and potentially subject to focused site visits. ACEND offers multiple resources to assist programs in documenting full compliance and promoting program improvement.

We believe the resources provided are beneficial in assisting our programs to be successful. We offer both online and in-person assessment and accreditation training for program directors. Each program is assigned an ACEND accreditation manager to provide individual guidance and support.

ACEND works with the nutrition and dietetics educators and preceptors organization to offer mentoring services to connect program directors of at-risk programs to more successful program directors who are willing to serve as mentors.

Additionally, the ACEND program director newsletter is published quarterly and provides a program with an in-depth of information in relation to accreditation. The vast majority of the at-risk programs maintained accreditation.

In the past 5 years, 13 of the 28 programs placed on probation documented compliance within their designated compliance timeframe and 12 programs were given an extension

for good cause. Of these, 8 programs came into compliance with the extended timeframe.

Although ACEND provides assistance to at-risk programs to come into compliance, it does on occasion, have to take adverse actions against programs that do not come into compliance and are not able to provide students a quality educational experience, thus, accreditation was withdrawn from two programs.

In addition, five programs that were facing potential withdrawal of accreditation voluntarily chose to close instead. ACEND routinely reviews its accreditation processes and has made changes in its processes to address stakeholder concerns and reflect accreditation good practices.

ACEND's accreditation term had been a 10-year term with a required extensive program assessment report called PAR as it was referred to in the 5th year of that 10-year cycle. In 2014 the ACEND Board voted to change the accreditation term to a 7-year term and eliminate the PAR.

This decision has been well received by ACEND accredited programs, thus, programs that meet all ACEND standards and have documented compliance with all accreditation standards are given a 7-year term and their program outcomes are

monitored through an annual report.

Programs that are not able to demonstrate compliance with all standards during their accreditation review are given shorter accreditation terms and are required to submit monitoring reports.

ACEND reviews its standards every 5 years, the most recent revisions of the standards was released in 2017. In addition, ACEND has launched a multi-year project to assess the educational preparation needed for future practice in nutrition and dietetics.

The data collected in the standards development process has been shared on our website with stakeholders in a document we term, “The Rationale Document”. Feedback from the stakeholders has been collected in multiple ways at multiple times and used to develop and revise the resulting standards named the Future Education Model Standards.

These standards will be tested over the coming years in demonstration programs who volunteer to be accredited under these standards. No programs will be required to be accredited under the future education model standards. ACEND will collect outcomes data from the programs, from program graduates and from employers of program graduates before making

any final decision on implementation of the future education model.

We're honored to appear here today before NACIQI with the U.S. Department of Education staff analysis report recommending renewal of recognition for 5 years with no compliance issues. This concludes our remarks. Again, on behalf of the ACEND Board and staff we'd like to thank the Department and the distinguished Committee for the opportunity to present additional information in support of our petition of recognition and we're ready to answer any questions you may have and thank you again.

CHAIRMAN KEISER: Thank you, questions by Jill or Rick?

MS. DERBY: No, I'm good. Good report.

CHAIRMAN KEISER: Any questions from the Committee -- Simon?

MR. BOEHME: I just wanted to make a comment not so much a question but it's my understanding you have a non-voting student member and I just wanted to applaud you for including students in that process.

And if you don't mind just sharing with the people who are listening here, other accreditors, how you did it and

explain to people who don't have a student member that it's probably not that difficult to do.

MS. EASTMAN: Well the non-voting member they get -- there I go again, they get a year to soak it all in before they start casting votes. And we have found that very helpful. Mary, I'll defer to you on how we -- how we've added our student member.

MS. GREGOIRE: Yeah, so actually there are two student members that are on the Board at any point in time. One is a voting member who is in their second year of their term, the other is a non-voting member. We reach out to our educators and ask them to nominate students.

Students can also nominate themselves. Then our nominating committee which also includes one of the students as a member and then the second student assists with the interviews so all of the students that are interviewed by the two student members and then they make recommendations to the nominating committee.

The nominating committee then makes recommendations to the Board as it relates to the ballot. They've been invaluable. The other student member -- the student member who is the voting member serves on the Standards Committee and

that person has their input -- has been, as I said, invaluable as we've worked through both the revision of our 2012 standards into the 2017 standards, but as we've looked to the future in that.

So we have found the student input to be critically important and we would strongly encourage others as well.

MR. BOEHME: Well that's very exciting, thank you for all that you do.

CHAIRMAN KEISER: Ralph?

MR. WOLFF: Thank you, I really appreciate the thoroughness of both your presentations but the analysis you've done through the exam pass rate, the shortening of your terms, et cetera. I'm looking at your website and I have a few questions.

There's a website that I think is yours, it's linked to "Eat Right Pro". Is that right or --

MS. EASTMAN: Yes.

MR. WOLFF: I'm trying to understand where the accrediting Agency's website when I do a Google search there is all kinds of -- there are other related websites and I'm just not sure do you control the "Eat Right Pro" website or?

MS. GREGOIRE: We control the content that's on the ACEND portion of that website so our website starts out with the www.eatright.org/ACEND -- A-C-E-N-D and so it is run by

the Academy of Nutrition and Dietetics -- they're IT staff but we submit the content of what's on that site and control the content that's on that site.

MS. EASTMAN: And we pay for it.

MS. GREGOIRE: Yeah.

MR. WOLFF: And that includes all the state requirements and the salary data. I mean do you provide that or does the Association provide that?

MS. GREGOIRE: So the, you mean salary data for registered dieticians -- that work is actually done by the Academy and so the Academy does compensation and benefit surveys every other year I believe it is and they have those results posted on the Academy's website.

MR. WOLFF: And the state requirement is licensure requirements?

MS. GREGOIRE: That is -- that also -- the information that's posted on the website is posted by -- there's a group called the Consumer Protection and Licensure Sub-Committee and that group collects those data and reports on licensure laws in each of the states and so that data is available then both for you know, anyone from the public looking for members but is also available then to educators.

Our standards do indicate that programs need to look at state laws as it relates to setting requirements for their programs as one of the components because those licensure laws do differ by state.

MS. EASTMAN: And if I may add to that, it really is a crazy quilt of licensing laws across the United States for nutritionists and dieticians. Some states require it, some don't and so ACEND just says where your program is located you need to include that information and make sure your students know about it.

MS. GREGOIRE: And that's in addition to the national registration so there is national registration for dietician nutritionists, and that's what's controlled by the Commission on Dietetic Registration.

Most states -- in fact I think all states recognize that so if a registered dietician applies for licensure in the state that is accepted but many states have alternate routes that practitioners can use to gain licensure in the state.

MR. WOLFE: Thank you. I found it really helpful to go to the website and I think it's because of the patchwork quilt, really important to have that distribution of information by state. I also would note that my hometown has the highest salaries for --

which is unfortunate because it's also the highest cost of living for the Oakland, Freemont area.

Looking at your website I think I'm on the right website because it says Accreditation Council. It looks like you've taken some very clear and direct actions, probation -- you really put people under compliance.

I have a -- I can't fine who you have taken action against. I mean the search I'm struggling on your website to say what are your actions because it's search for programs by state and then so I'm trying to say if I wanted to know what your actions are, who's under a compliance review, who's on probation or like -- how would I find that out?

MS. GREGOIRE: So further down on the web page is the information for the public and under that are the decisions, Mary Anne, maybe tell me the exact phrasing of that and all of our actions by Board meeting are posted there.

MR. WOLFF: That's public notices --

MS. GREGOIRE: Yes.

MR. WOLFF: And --

MS. GREGOIRE: So within that public notices section --

MR. WOLFF: Under accreditation decisions?

MS. GREGOIRE: Yes.

MR. WOLFF: I see and then it's recent decisions and are your probation actions public information?

MS. GREGOIRE: Yes and then also if you searched by program -- so if you went in to the accredited programs and searched by program their current status is listed so if you were interested in a particular school their accreditation status is listed in the info of section for each program but our overall decisions are in that public notice section.

MR. WOLFF: And just I'm curious to know with a program that's on probation at the institution level are they required to state on their website that they are under probation?

MS. GREGOIRE: Yes, yes, and it needs to be on their home page, so we require that their accreditation status regardless of what that accreditation status -- but if a program is placed on probation then they need to put that on their website and they have to send us verification that in fact it has been placed there.

MR. WOLFF: And do they also need to -- given that you've established an 80% minimum for passage of the licensure exam, do they need to -- do the programs need to identify what their last 3-years of passage rates would be like the bar exam

or the licensing exam for dieticians?

MS. EASTMAN: Well just sir it would be the registration exam.

MR. WOLFF: Okay, but are they required to publicly identify what that is so --

MS. GREGOIRE: Currently our policies say that if requested they need to provide that information. At this point we don't require that they place it on their website unless they choose to. Most of our programs have it listed but at this point we don't require that it's placed on their website.

MR. WOLFF: And if a student or graduate fails to pass the exam after multiple attempts are they barred from practicing or what are the consequences of not passing?

MS. EASTMAN: Well an individual can retake the registration exam with a 6 week hiatus and they can retake it and retake it and retake it as long as their will and wallet holds out.

MS. GREGOIRE: So they would be -- they would not be eligible for positions that required that credential but they do often get positions in other either food service, community programs, so there are positions that they might get that do not require that that would have some of the similar background that they've been prepared for but did not require that credential as part

of the position.

MS. EASTMAN: As a for example with programs in some states require the registered dietician and nutritionist credential, some states do not so an individual who hadn't passed the RD exam in some states could function as one of their occupations.

MR. WOLFF: Thank you.

CHAIRMAN KEISER: Herman and Bobbie.

MR. BOUNDS: Yeah I just wanted to make a reminder to all Agency actions are also reported on the Department's website. They're required to do that under 60226. I just wanted to remind everybody that it's there too. Since that's not an area now that they report on under the focus review I just wanted to let everybody know that that's still a requirement and they do report those actions.

MS. GREGOIRE: And we do report them yes, there as well.

CHAIRMAN KEISER: Bobbie?

MR. WOLFF: Could I just ask Herman a question about -- when you post on the website there was a point in which you were requesting all sanction letters or probation letters and is that posted? I haven't gone to the Department's website. What

information would we get on the Department website?

MR. BOUNDS: So you would get any actions -- what we call adverse action if the Agency has taken, you'd get the probation actions and then we've asked agencies to also report the associated decision letter which would explain the reason for the action.

MR. WOLFF: Thank you.

MR. BOUNDS: Okay.

CHAIRMAN KEISER: Bobbie?

MS. DERLIN: I have two questions for you. The first one concerns your pass rate standard of 80% and you mentioned that over time there have been some adjustments in the number of years you consider and so on. I'm wondering if you can tell me a little bit about your process for knowing that 80% is a good standard rather than 82 or 78 and how that process of informing that decision of 80% how that worked?

MS. EASTMAN: Well thank you for the question. Well the pass rate data is collected annually from each program and we have over the years with this data that we have collected registration exams have been required since the 1970's and so we have you know, that many years-worth of data under our belt.

And the -- we chose this particular pass rate because

national means on the scores on the mean and we had what are two standard deviations from that mean so you know, it's a statistical analysis. I think they call it a FADA statistic. You'd have to ask greater minds than I about the FADA.

It was examined by programs and so using that -- those many years of data, the pass rate means one or two standard deviations that's really how we came up with it. Mary would you like to add something to that?

MS. GREGOIRE: Yeah and we also looked at what other accreditors had looked at so each year when -- every 5 years when the Standards Committee reviews the standards they take another look at that and look at some of those statistics and where it's at, how programs are performing, whether or not it needs to be adjusted.

And it was in that discussion that changing from averaging it over 5 years to over 3 years because we were finding for programs to come back into compliance it was taking so long to be able to see the impact of the changes they were making and by moving that to a 3-year you were more quickly able to see the improvements in those changes they were making in their programs.

MS. EASTMAN: Yeah if a program had stumbled

and it was 5 years back, you know, it just took so long for that data to be washed out and we found that the improvements that were being made were showing up within that 3 year timeframe and well we considered that appropriate.

MS. DERLIN: Thank you and then I have one more question Art. And this concerns the engagement process that you mentioned for a variety of things but in particular for the future education model.

So you've got a rather deliberate schedule established for implementation but your stakeholders which is a phrase you've used, I'm assuming represents probably multiple groups but at least two -- the programs who are participating in this accreditation activity and also the field -- all those places that are employing graduates of the programs.

Can you tell me a little bit more about how the engagement of the field has influenced the model?

MS. EASTMAN: Well thank you very much. We've been working hard on this project for 4 years now and when you say there's a -- we have a time line, we do have a time line for doing demonstration programs. We have a first cohort, a second cohort, a third cohort of volunteer applications coming forward.

We do not have a timeline on the backend of it.

This process will take as long as it needs to, that we need to collect data on how this works before any decisions are made. So yes there is a time line -- as we're entering demonstration programs but not a time line in when decisions will eventually be made that in the 4 years that we've been working on this we've had in depth interviews, we had online surveys.

One of our surveys had 9,500 respondents. A second survey went out and we had over 7,000 respondents that we have had town hall calls -- is it for the past two years Mary, where it's been monthly town hall calls. We had one just last week where people can call in, ask questions about any accreditation thing.

There's been a lot of questions during those town halls about the future education model. We have had roundtables at each of our national meetings. We've had discussions at the nutrition and dietetic educators and preceptors regional meetings every year.

There's not at this point in time there's three of those every year and ACEND is there every year. We've had roundtables, we have had open mic discussions so is that the kind of information that you're looking for Dr. Derlin?

MS. DERLIN: Yes.

MS. GREGOIRE: I'll just add to that that the

comments that have been received we've really tried to get broad-based and so we've had comments and we ask people to identify the perspective and so we have and it's documented in the rationale document that's actually posted on our website, but we've had the input from educators, from employers, from practitioners, from practitioners outside the field of nutrition and dietetics, from students, and so we've really pushed to try and get broad-based input as we've been working on that over the last several years.

And the source of the information and whether or not there were differences among those stakeholder groups all of that is posted in the data that's been analyzed and then put in that rationale document online.

MS. DERLIN: Thank you very much and between the two of you, you've nailed it thanks.

MS. GREGOIRE: Thank you.

CHAIRMAN KEISER: Sensing no more questions, thank you if you'd just take your seats while we have -- we have three public commenters, four I'm sorry, it should be first.

Could you wait until we call you please okay, because we want one at a time. The process for public comment you will have three minutes to make your presentation. There's a

timer right in front of me. At one minute the yellow light will come on and at three -- when the red light comes on we'd ask you to wrap up your comments.

The first commenter is Dr. Michelle Harris, Associate Professor of Nutrition from the University of the District of Columbia. And you push the little button that says speak.

MS. HARRIS: Good morning NACIQI Committee members. I appreciate this opportunity to testify on behalf of my colleagues and current, former and future students. I acknowledge those who are here today with us.

I have 9 points that I would like to make. One -- a requirement of a Master's Degree for entry into the profession of dietetics places an unreasonable burden on students from diverse backgrounds, especially for those who are already under represented in the profession in terms of race, gender, and socio-economic status.

Two -- ACEND has not demonstrated that requiring a Master's Degree to enter the profession of dietetics will result in significant higher earnings for those who acquire advanced degrees. In other words, a lack of return of investment is very likely.

It is the expectation that ACEND will provide evidence regarding any claim of a return on investment.

Three -- despite significant input from many educators of nutrition practitioners, ACEND has apparently chosen not to consider the heavy student loan debt that many who enter the field have after earning Baccalaureate degrees.

Four -- despite significant input from many educators of nutrition practitioners, ACEND has apparently chosen not to have considered that individuals often need a few years or many years to determine what advanced degree would work best for them and for their current or future employers.

Five -- an advanced degree does not necessarily lead to improved clinical thinking skills for practice in the field of dietetics. Improved critical thinking skills in the profession are generally developed through actual practice.

Six -- ACEND has not demonstrated that the public will be well served by their proposal. This is especially true for communities that are under served including those whose culture, race, socio-economic background et cetera are different from the majority of those who practice in the field of dietetics.

Seven -- ACEND has not demonstrated that having an advanced degree with little or no relevant work experience

1 would produce superior practitioners compared to practitioners
2 who hold Baccalaureate degrees in the field who also have relevant
3 work experience.
4 Eight -- ACEND is not acting as a body that is
5 independent of the Academy of Nutrition and Dietetics. The
6 Academy -- Mary Gregoire, Executive Director of ACEND and
7 Christine Reedy, Executive Director of CDR receive salaries from
8 the Academy. They, therefore, work for the Patricia Babcheck, C
9 or the Academy.
10 Because of this financial conflict they have not
11 acted in the interest of the membership of the Academy which is
12 comprised of dietetic professional students and dietetic interns.
13 This lack of autonomy of ACEND from the Academy is
14 disturbing.
15 And finally, nine -- many of my professional
16 colleagues and I believe that ACEND does not listen to us. Their
17 surveys do not appear to be scientifically developed or analyzed.
18 Their survey questions lead to conclusions that they want rather
19 than providing the opportunity for true feedback and import.
20 CHAIRMAN KEISER: Time.
21 MS. HARRIS: One more sentence?
22 CHAIRMAN KEISER: Alright one more sentence.

MS. HARRIS: Okay, they go through great lengths to appear to invite us to share our thoughts and ideas but they do not incorporate our input into the decisions they make that affect the profession.

CHAIRMAN KEISER: Thank you, questions from the Committee? Thank you very much, oh I'm sorry.

MR. O'DONNELL: I thank you for coming today. I'm just curious from your perspective what do you think is driving the desire and I've read some of the stuff that's available online but from your perspective what do you think is driving their desire to require a Master's Degree?

MS. HARRIS: I'm part of a group of educators for nutrition and dietetic professionals and we have a lot of dialogue. We submitted a lot of that in writing to a written testimony during the public comment period but I really don't understand. I mean I feel that folks who sacrifice a lot of money to get into a field and they're going to be great at it once they get a couple of years under their belt with support and all that.

To be required to get a Master's is to me, closing out a lot of folks from under -- how do you call it, under -- from backgrounds that are challenging in terms of finances. It's like the folks who make the decisions are in another world from those who

are trying to get into the practice -- even students who maybe are the majority and have money, to get into a field where we're not going to make a lot of money, you know.

Most of us don't but we have these -- the students have huge financial burdens to pay their Baccalaureate Degree and all of a sudden out of the sky they're having folks come in with Master's -- I think it's an issue with self-esteem to be honest because this is mostly a female driven, you know, represented profession and they're just making decisions without really the input of those who are educating the folks who are entering the field.

Another thing is I've read the part about how many people know what they want to get advanced degrees in as soon as they get into an undergraduate school? They need to really work and figure out where is my niche, what is my strength, what is my passion beyond the nutrition part, you know, of what their work is.

One of the persons on the panel earlier has an MBA. Is that going to be an acceptable degree or not or is basket weaving a Master's in that -- is that going to be an acceptable degree? I don't think it's really been -- we have not been heard. The educators have not sincerely been heard.

MR. O'DONNELL: Right so, thank you for that.

So I used to oversee the regulation of all licensed occupations for a state and often had to determine if what I consider credential inflation was driven by genuine needs for people to acquire additional skills and knowledge to perform their profession or was it more trying to reduce competition and new entrants and almost like a closed guild.

But I can't quite understand from your answer -- and again I'm not -- I understand your concerns about limiting access to the profession for an under-represented populations. But I'm trying to get your perspective on how much of this do you think is legitimately driven by the need for additional skills and knowledge and how much of it if any, may be driven by other economic factors?

MS. HARRIS: I don't know about the guild part. The guild has worked in the fact that a lot of folks who are interested in really delving into this profession are not able to enter because of this accelerated barriers.

But most professions people who really learn after they've been in it for a couple of years in the real world or through, you know, the training yes, but they have to go through it. We have folks who have PhD's and Master's Degrees in nutrition. No experience.

They come in and they're being trained by people who have Bachelor's Degrees when they get out there to do their dietetic -- you know, they're experience part just to start learning. They're often times clueless. I send my students through my didactic program in dietetics to the community but I have to vet some of those folks who have licenses and some of them who know less than my students may know through their training.

They come in backdoor training as a way to get licensed and they're clueless and that's the danger. That's what I want the profession to focus on -- making sure that everyone who works with vulnerable populations or under-represented populations are really trained not only in the technical aspect but also in cultural competency, understanding the environmental issues that folks face not just because they have these elevated degrees with no practice versus those who have years of practice but may not have, you know, those elevated degrees because they can't afford it.

They're still paying off student loans -- undergraduate.

MR. O'DONNELL: Okay, super, thank you for your perspective.

CHAIRMAN KEISER: Frank?

MR. WU: Just so we understand, who is requiring the Master's Degree? Is it the accrediting body or is it different states in the licensing requirements?

MS. HARRIS: From this conversation it's the accrediting body will not let anyone sit for the entry level exam unless they have a Master's which to me does not guarantee that those folks will be critical thinkers or have actual knowledge but they may be able to pass an exam because they have these, you know, these kinds of skills.

And a lot of that is based on socio-economics too. You can get, you know, a whole lot of other things because of that.

MR. WU: Got it, so it's the accrediting agency administers a test and you have to have a Master's to sit for the test.

MS. HARRIS: That's the proposal. At this time it's not that, but it's proposed and I'm here not for any of the other issues that are happening but one -- about not having them go forward without more real data, real data.

And two -- I've voiced this as educators really get heard and then one other thing is it sounds really good when they say they have a Nominating Committee. We have a lot of thresholds the folks that are really representing the profession at

the grass roots and so forth, who don't get in because of that barrier.

MR. WU: Yeah, so just very briefly, this is to Rick's point. I would encourage you to take up this issue within the accrediting agency and its processes and this is an observation and a question for Rick. I wonder if this falls within the purview of NACIQI?

It may -- it might not, whether an accrediting agencies who administer tests that are used for licensure, if we have any authority to question or do anything. I have no view on it I'm just asking as a question. It may be Rick that this is an area that we could delve into either with this Agency or with others.

Or may that it's not within our authority -- I don't know the answer to that one.

CHAIRMAN KEISER: Thank you very much Dr. Harris. The next presented is Raeleena Collington from Terrific, Inc., welcome.

MS. COLLINGTON: Good morning, my name is Raeleena Collington. I've been in the field as a nutritionist for the past 20 years and I disagree with the Academy's mandate that the entry point into the profession should be at the Master's level.

It will create another barrier for those with the

desire to enter the profession. Those that might not be able to obtain a Master's Degree or simply may not want one will not be able to apply for internship.

Prior to this mandate getting into an internship to become a dietician was hard. In fact there was a moratorium because the supply did not meet the demand. Similarly, there were two additional pathways created however still more than half of the applicants were not placed.

In 2018 applicants into internships -- applications into internships were low as students did not bother to apply out of fear. Moreover, students that obtained their Bachelor's Degree are either leaving the profession on their own or are forced out because of the lack of internship opportunities.

The mandate of a Master's Degree will further complicate the already rigid process and eventually cause a shortage with regard to community dieticians, thank you.

CHAIRMAN KEISER: Thank you, Jill you have a question?

MS. DERLIN: Yeah, you know what this discussion about is the future education model that the Agency is considering as a proposal. So I'm wondering whether or not you and others have had an opportunity to have input with them around

your concerns.

This is a little bit to Frank's issue about whether or not this appropriately comes before NACIQI because at this point this isn't something that has been approved and is required -- it's a proposal up for consideration before the Agency. My question is are you -- do you all have that opportunity to have your input as that conversation goes forward?

MS. COLLINGTON: I've participated in surveys and I've voiced my opinion.

CHAIRMAN KEISER: Thank you, Jennifer?

MS. HONG: Yeah just real quickly to Frank's question. I think you all are asking the right question about input so in terms of what the profession establishes as its minimal degree requirements and entry level degree into the profession -- it's established by the profession so that would be outside of NACIQI's purview.

However, accrediting agencies are required to have a systematic program of review and to publish a call for comment to listen and to take into account comments and so that is within NACIQI'S authority within the regulations to ask these questions.

MS. COLLINGTON: Thank you.

CHAIRMAN KEISER: The next presenter is and I

hope I'm getting this right. Gifty Enniful -- did I get that right?

MS. ENNIFUL: Yes you did.

CHAIRMAN KEISER: Oh good, welcome, you have three minutes.

MS. ENNIFUL: Thank you, good morning. First of all I'd like to thank Mr. Vice Chair for directing us to the right place to go. We -- personally I have and I understand now where to take my concerns. I represent the student body that will not have the opportunity to get a Master's Degree because of lack of funds.

So that will be my contribution for today. Thank you everyone, and thank you Mr. Chair and thank you for hearing us out.

CHAIRMAN KEISER: Thank you, are there any questions? Again, thank you very much for appearing before us.

MS. ENNIFUL: Thank you.

CHAIRMAN KEISER: The final speaker is Madeline Bomberger who's also a student at the University of District of Columbia. Welcome, you have three minutes.

MS. BOMBERGER: Okay good afternoon everyone. I just wanted to thank you all first of all for being here because I mean it's a lot as far as the education and helping

everyone. I actually also thank you for letting me know where to address my concerns as well so you have answered what I had to say but I wanted to make sure to come up and tell you all how much I appreciate you being here and being a voice in people's education and I hope you have a great day, thank you.

CHAIRMAN KEISER: Well I like it when the third party commenters thank us, that's great. That's something new -- any other questions for Michelle? At which point I'd like to bring back the Agency if they have any responses to the third party commenters.

MS. EASTMAN: Well thank you very much. We appreciate the public comment period and also our opportunity to respond. So I'm going to briefly respond to some of the issues that were raised today and we're ready to answer any additional questions that you may have.

I want to clarify that the future education model standards are still in development stage and they are not required of any program. And the requirement for a Master's Degree that has -- that we stated will occur in January the 1st of 2024 is not an ACEND requirement.

That is coming from the Commission on Dietetic Registration which is autonomous. That is not us. The exam -- the

1 credentialing exam to become a registered dietician nutritionist and
2 a diet technician, a nutrition and dietetic technician registered --
3 those exams are given by the Commission on Dietetic Registration
4 and that is sole and separate and autonomous from us. So I just
5 wanted to clarify that point.
6 I respect my colleague and the other colleagues who
7 and students who presented their concerns but I respectfully
8 disagree with the conclusions that they've drawn that ACEND has
9 collected feedback from stakeholders as we had mentioned from
10 thousands of respondents over these past four years.
11 All of that data is shared on our website in that
12 rationale document that I previously mentioned. From these
13 thousands of individuals who've responded there are stakeholders
14 opinions that vary across the spectrum.
15 We have individuals who are very enthusiastic
16 about the future education model. We've had some of them say
17 why don't you implement it immediately -- right away? And then
18 we of course, we have individuals who are opposed to the future
19 education model.
20 So what we said to ourselves let's test this out and
21 we looked into U.S. Department of Education documents and
22 information and we found the demonstration models and we kind

of went Eureka, here's what we need to do is use demonstration programs, test it out, see what data comes out of it so that we have the information to make a decision about this at some point in the future which could be many years out in the future.

So the requirement for the Master's that will occur in 2024 is not us, that is a separate autonomous group. Yes sir? Oh I'm sorry, the Chair must recognize -- I take it back.

CHAIRMAN KEISER: My powers --

MR. WU: So could I sum up and you can tell me if I'm hearing this correct, alright so I'm just going to make four points. Number one -- there is a registry in this profession. Number two -- you're not the registry. Number three -- the registry is going to implement a Master's Degree requirement so those three statements are all accurate, okay?

MS. EASTMAN: Yes sir.

MR. WU: Okay and fourth -- the issue here is whether on the one hand the Master's Degree serves some legitimate purpose of protecting the public or ensuring skills or on the other hand serves the self-interest of people who might want to keep others out or will have an adverse disproportionate impact on minority communities -- those who are underserved and those aren't mutually exclusive.

It could be it serves a good purpose but has a bad side effect just as drugs that do good things for us have bad side effects. So that's really what this debate is about -- whether the benefit outweighs the cost. But regardless that debate isn't in your body, it's not within the accrediting authority it's with this other thing -- this registry.

MS. GREGOIRE: If I could just add some to that discussion. The diversity issue has -- I mean it's been a concern for ACEND as it is with I think many health profession accreditors.

We've seen an increase in our diversity over the past 10 years, most notably Hispanics which have more than doubled -- currently about 28% of our students are non-white students.

We looked at this issue because it was raised early on if we were to raise the education requirements to the Master's level what impact would they have? So we actually looked at what we currently have within our programs because we currently accredit some of our programs at the graduate -- at the Master's level and some programs at the under-graduate level.

And we looked at the diversity in those programs compared with the diversity of our internship programs and

coordinated programs that are just at the undergraduate level. And what we found was that both the racial ethnic diversity as well as the gender diversity was actually the same -- whether that was a graduate level program or not. We also checked with other accreditors who have increased -- several other accreditors have increased their education level in the last several years and have not seen a decrease in in the diversity.

I think we are all still continuing to try and increase diversity. Then related to that, I know the question has been raised as to why we might want to do that and so part of the data that we've collected over the last -- as we started this project was really looking at what are the needs in the profession as we go forward?

And what we found is that as you -- some of you may know the knowledge base in nutrition particularly has exponentially expanded in the last decade and so preparing students to be able to in fact understand, use, interpret that information for the public, that need has expanded.

The places in which graduates are working has greatly expanded as well. Many of those moving outside of maybe the traditional hospital sort of environment that might have traditionally into community schools, supermarkets, a broad range of types of work settings.

The importance of counseling skills has greatly increased and the need to teach students the subject matter that's needed to be effective counselors to in fact affect behavior change with people in their eating habits. Also, the need to work better as a member of an inter-professional team, that inter-professional education and working with medical inter-professional teams and creating that knowledge base and then finally the need that's come from employers saying we want to see graduates more job ready.

We want them to be getting those skills as part of their educational program rather than coming to us and needing to be trained for a period of time before they're in fact job ready. All of those pieces were what fed into the Standards Committee and ultimately the ACEND Board wanting to then move and elevate the level and create standards that we create that graduate degree prepared practitioner that would have some of those skill sets that are really being demanded in the marketplace at entry level.

And as a second piece, I did just want to commend students. One of the things for coming today and for making their comments, one of the competencies that have been increased in the ACEND standards is that leadership and advocacy and so I commend the students for coming today.

CHAIRMAN KEISER: Thank you.

MS. EASTMAN: If I may sir, we do have a research logic model that we will test out the demonstration programs by so demonstration programs will give us the data for us to make decisions in the future.

MS. ALIOTO: Yes, when you mentioned this thing about people being more job ready -- so it would seem when you have an 80% in one field and 75% success rate in another that perhaps the training is a little askew rather than focusing it on what appears to be a somewhat anti-competitive move here.

If you have an 80% success rate in the exams then why is -- why is the Commission coming up with this. I mean you've already explained from your perspective but it does have another kind of feel to it.

MS. EASTMAN: Well the future education model is to look to the future. Yes we think we're -- that nutrition and dietetics education is doing a good job in the here and now but we needed to look into the future and what that future might be.

So you know, you know, thank you for a very good question. We're proud of where we are now but we are looking to the future and what does that need to be, so that's what the future education model is looking into that crystal ball.

CHAIRMAN KEISER: Any further comments?

Thank you very much. Dr. Harris, Nicole would you like to come back?

MS. HARRIS: I have nothing to add.

CHAIRMAN KEISER: Thank you very much. Sensing none, would the Primary Readers -- I would entertain a motion from them.

MR. O'DONNELL: Mr. Chairman I would move that that the staff recommendation to renew the Agency's recognition for five years.

CHAIRMAN KEISER: Is there a second? Second by Jill, any further discussion, sensing none all those in favor of the motion signify by raising your hand, all those opposed?

MS. NEAL: And I'm doing this because I am concerned about the credential inflation issue here and just would like to register a protest in that way.

CHAIRMAN KEISER: Okay could you raise your hands one more time? Everybody raise your hands or those who want to vote --

MR. WU: Wait, this is for yes?

CHAIRMAN KEISER: For in favor of the motion, raise your hand -- it's all but one. Kathleen are you voting against that -- I'm sorry.

MS. ALIOTO: Against.

CHAIRMAN KEISER: Okay so two.

MS. ALIOTO: I agree with Anne.

NACIQI RECOMMENDATON

To renew the Agency's recognition for five years.

CHAIRMAN KEISER: Okay, thank you very, very much. Thank you. I hesitate to say that we need a 10 minute break but we do. Thank you, please come back in 10 minutes.

(Break 10:37 a.m. - 10:50 a.m.)

RENEWAL OF RECOGNITION

NORTHWEST COMMISSION ON COLLEGES AND UNIVERSITIES (NWCCU)

CHAIRMAN KEISER: If everybody could take their seats please, members of the Committee. We don't have a quorum. 2-3-6-7- I do have a quorum. Okay we are going to be reviewing the Renewal of Recognition for the Northwest Commission on Colleges and Universities.

The Primary Readers are Ralph Wolff and Frank Wu and I ask, there are recusals and Steve Van Ausdle is recusing himself, actually just Steve. Any other recusals -- no. Okay thank you, whoever is going to make the presentation, Frank?

MR. WU: Sure, briefly this is one of the regionals

they accredit in 7 states, Alaska, Idaho, Montana, Nevada, Oregon, Utah and Washington State. They've been recognized since we started business in 1952 and they also have authority with respect to distance education.

CHAIRMAN KEISER: We have a second recusal -- Roberta Derlin. I'd like to recognize Stephanie McKissic to make the staff report please.

MS. MCKISSIC: Good morning Mr. Chair and members of the Committee. For the record my name is Stephanie McKissic and I will be presenting a summary of the petition for continued recognition submitted by the Northwest Commission on Colleges and Universities also referred to as NWCCU or the Agency.

The staff recommendation to the senior Department official is to renew the Agency's recognition for a period of 5 years. Based on review of the information in the Agency's petition and observation of a Commission meeting in January, 2018 and a site evaluation in April, 2018, Department staff has found that NWCCU is in compliance with the Secretary's criteria for recognition with no issues or concerns.

The Department did not receive any written third-party comments and has received two official complaints during

this official review cycle regarding the Agency. One complaint was reviewed and the Department found no evidence that NWCCU did not follow its policies and procedures or fail to meet regulatory requirements.

The other complaint was received this month and is still under review. Therefore as previously stated, the state recommendation to the senior Department official is to renew the Agency's recognition for a period of 5 years. There are Agency representatives present today and we're happy to answer any questions you may have at this time. This concludes my report, thank you.

CHAIRMAN KEISER: Thank you Stephanie. I call the members of the Agency to please come forward and introduce yourselves.

MS. MOORE: Good morning Chair Keiser and members of the National Advisory Committee on Institutional Quality and Integrity. I'm Marlene Moore, Interim -- I have to emphasize the word Interim President of the Northwest Commission on Colleges and Universities.

With me today at the table are the following individuals -- Dr. Joe Brimhall, the Chair of the Commission and the President of the University of Western States is on my

1 immediate left. Next to him is the incoming present of the
2 Northwest Commission Dr. Sonny Ramaswamy who will take
3 office in July.
4 To my right is President Scott Pulsipher from
5 Western Governor's University and to his right is Dr. David
6 Yarlott, President of Little Big Horn College. And we have
7 several other representatives of the Commission who are with us
8 today. The Vice Chair, Dr. Thayne McCulloh, President of
9 Gonzaga University, our General Counsel, Randy Aliment and
10 Senior Fellowman.
11 I would like to take a moment to thank our two
12 NACIQI reviewers, Frank Wu and Ralph Wolff. I'd also like to
13 recognize and thank Stephanie McKissic for her time with us and
14 her guidance on the petition.
15 We also appreciate the work that Herman Bounds
16 did with us and it's such a pleasure to meet Jennifer Hong after
17 seeing her name for years so it's a pleasure to be with all of you.
18 In terms of my introductory remarks, I'll provide an
19 overview of our Commission based on the questions from
20 NACIQI, then I'm going to ask President Pulsipher and President
21 Yarlott to give specific examples of how the Commission
22 improves quality at institutions that are very distinct and have very

1 different missions.

2 Then Chair Brimhall will talk about changes at

3 Northwest Commission and how it's functioned during this

4 transition period and we will close with remarks from our

5 incoming President, Dr. Ramaswamy and welcome your questions.

6 Of our 158 institutions, roughly 70% are public,

7 30% are private, we have one for profit institution, roughly half of

8 our institutions are less than 4 year institutions and in total we have

9 an undergraduate enrollment of roughly 874,000.

10 35% of our students are PELL eligible. Our

11 Agency has an operating budget of just under 3 million dollars and

12 we employ 10 full-time staff members. As an Agency we take

13 pride in the fact that we know our institutions well.

14 The reasons that we do know our institutions well is

15 that for the past 8 years we have had a 7 year accreditation cycle

16 and during that 7 years we require three reports and two site visits.

17 In addition, we require annual reports on student

18 achievement and financial stability. Institutional trend information

19 from those annual reports is provided to evaluation committees and

20 institutions as part of the comprehensive review. Evaluation teams

21 engage the institutions in a set of formal questions about the data

22 and include the responses in the evaluation report.

This is one specific example among many where we use data to engage in a deeper conversation. Our system best fits the management based approach to quality assurance displayed by Brown, Curtis, Wile and Pritchard in their report on quality assurance on U.S. higher education, the current landscape and principles for reform.

Of course we utility input measures and performance based output measures, but with the management based approach we really do value our frequent interaction as they would describe between the regulator and the regulated entities. To monitor planning, revision and progress -- so for example the first report of the 7 years the institution puts forward its expected outcomes, along with objectives for each of those outcomes and a set of meaningful assessable and verifiable indicators of achievement for each objective -- that's the first report.

The mid-cycle report and visit are formative. They're designed to insure that the institution is systematically collecting and analyzing meaningful and verifiable data, for evaluating accomplishment of its objectives.

The year 7 report and visit require documentation that the students achieve the intended learning outcomes and that the results of assessment of study learning inform planning to

enhance student achievement.

So in answer to your question about strategy that we've chosen to address success with regard to student achievement, that strategy is to monitor the institution's assessment and improvement practices with regard to student learning outcomes.

Insisting on faculty assessment of student learning is a role that works well for a regional accreditor where we have peer evaluation and peer review because it has the faculty teaching other faculty.

Our commitment to this strategy is evidenced by a recent determination that one of our highly selective, well-endowed institutions was out of compliance with our standards that require assessment of student learning and using the results of that assessment for improvement.

Performance based student achievement data -- excuse me, would not have revealed that deficiency, or encourage the continuous improvement and institutional learning that we require of institutions.

Also this strategy encourages innovation because the focus is on student learning outcomes rather than on methodologies. The Commission has explored differential review

processes, we did a cohort model of four institutions, one 2-year public, two 4-year publics and one 4-year private and they did a three year special report that focused when they worked together on assessing the learning outcomes of their general education programs.

Then they shared those outcomes and what they learned from that process with a region-wide meeting, all reported a very positive experience with the modified process and the working with the cohort focused on one educational program stimulated increased institutional learning.

In response to your questions about how we define at-risk status our response is that we identify it at every stage of our process of regular and annual reports. If an institution does not set appropriate goals with meaningful, verifiable ways of achieving them, they are at risk.

Several years ago we modified our mid-cycle review to be more formative and to determine if institutions were collecting and analyzing appropriate data. At all stages of the process when concerns were identified we intervene and require special reports in addition to the regular reports.

So in fact over the past 5 years, 40%, almost half of the reports to the Commission have been special reports, in

addition to those three reports during the regular 7-year cycle. And that number refers to special independent reports and doesn't include areas of concern that they were told to address as part of a regular report.

About 4% of these total reports are financial resources reviews, so definitely minority on the nationally accepted ratios of 4 to 6 months in reserves in the USDE composite scores.

Evidence that the selective risk-based interventions the reports have worked, is that over the past 5 years the majority of deficiencies that we've given out are for improvement, not for being out of compliance.

We've also seen institutional learning with fewer of our deficiencies being for input, things like the proper policy and more of them who are not using results of assessment to improve. Over the past 5 years there have been 5 institutions placed on warning, one on probation.

Because of the frequent monitoring and constant interventions associated with this approach, harsher sanctions are less frequent and with a less invasive summative evaluation system. Our system would benefit from better national data on student achievement that would really help us set benchmarks for

the various types of institutions we have because as part of establishing their objectives they need to establish targets and benchmarks.

We are using those sales force data management system and we are in conversation with other regional accreditors about how to best share data and establish some of these norms. It is important to say that Northwest Commission does use national quantitative data as well as institutional and programmatic quantitative data in its evaluations.

The more valid the data, the more it would be utilized and the more weight it would carry. One of the challenges and I will say the joys of regional accreditation is to support institutional learning and accountability at very diverse institutions.

I'm pleased that two Presidents from very different institutions that serve very different student populations accepted the invitation to join us today to talk about how the Commission supports institutional quality.

I'd asked them to keep their opening remarks brief knowing that there will be time to answer your questions as we go through this hearing together. So please allow me to introduce President Scott Pulsipher from Western Governor's University.

MR. PULSIPHER: Chair Keiser, members of

NACIQI, thank you for the time this morning. Let me begin by giving a brief introduction to Western Governor's University so you have some of the background.

Western Governor's University was formed 21 years ago with a very simple purpose -- to change lives of individuals and families through education. It also serves particularly the under-served. We also focus on the adult learner which is typically those who have some college and no degree.

Our mission is simple -- it is a three-fold mission to improve quality, expand access and optimize student success. Because of the focus on our adult learners and those of you who understand those adult learners, they demand certain needs for flexibility and so some of our design are the hallmarks of Western Governor's University are the following.

First and most important we are the largest competency based education institution in the United States. That competency based model focuses on measuring learning and not time so we have to specifically deal with competency units versus credit hour.

Second, we offer more and personalized teaching and support in a faculty model that is unique. We also offer market aligned programs and curriculum at the Bachelor's and

Master's level only. We are 100% online, that allows students to learn independent of time or place and also our last hallmark is our low flat tuition based subscription based tuition per term where a student can learn as much as they can in a six month term.

Just to give you a sense of Western Governor's University at our current scale we currently have over 110,000 graduates, we are serving nearly 100,000 full-time students, 65% or roughly two-thirds rather in undergraduate programs and one-third of them being in Master's programs.

We offer 60 plus programs across four different college areas -- business, health, health professions, teacher preparation or teacher education and technology. We do serve and enroll students in all 50 states as well as military overseas.

More roughly 70% of our students are each in the following category -- they have children, they are working full-time. They are in one or more under-served categories such as military, rural, ethnic, minorities or low-income. More than 40% of our students are also first generation.

Let me give you a sense generally as that context as to how Northwest Commission also supports both our model and our mission to ensure that they effectively assess the quality of our design as well as supporting, enabling innovation that advances

learning.

Particularly I would comment in three particular areas -- program and curriculum design, student experience and delivery model as well as data and outcomes focus. And let me give you some of the specific examples.

First and foremost, the approach in the evaluation related to the design of our competency based master curriculum. I mean this is a non-credit hour model. That competency based design ensures that from the Northwest Commission's standpoint that they have to evaluate the learning objectives are clear both in course and program level, that we also have designed effectively our assessments to ensure learning outcomes are achieved for every single student through those programs.

That is a very different model than traditional classroom based environments. We are grateful for the Northwest Commission's also effort to ensure that we have learning objectives designed at both the course and program level. This is a particular conversation to our most recent 7 year review and ensuring that our assessment evaluation model evaluates those learning objectives and they are being achieved also at the course and program level.

Another key area where they evaluate and insure the

quality of our practice is in reviewing the integration of practicum or field experience in our licensure programs. For those of you who are not aware Western Governor's University is the largest nursing program in the country as well as the largest teacher education program in the country where we license teachers in all 50 states. That also requires us to insure that the field experience of the practicum is a critical part of the program requirements. This is important because we do this while also being at 100% distance education model, another great way by which the Commission specifically evaluates the quality of our programs.

A fourth area is within the faculty roles. We have a dis-aggregated faculty model and we are being peer reviewed as Marlene had mentioned that while we have reviewers from peer institutions that often by nature are more conventional in structure they are able to evaluate the specific subject matter expertise and the relevant credentials that are appropriate in both the course and program level of our dis-aggregated faculty and they ensure that not only our curriculum designers but our course and program and evaluator faculty all meet the standards.

They also ensure that the quality of our technology and how the technology is utilized to enable student learning and personalized for every single individual including all the support

experiences that allows both real time as well as asynchronous or self-served support models.

Most importantly, leveraging all of our student outcomes and our data as a technology-based institution of learning our data becomes a paramount ensuring that we continue to advance our student's outcomes, their learning, their progress and everything else and that we consistently validate with the Commission the use of that data as evidence of our quality in the student journey.

Lastly I would just simply like to point out that they have been incredibly supportive that since our initial accreditation in 2003, Western Governor's University had 1,000 students at that time. Today we enroll over roughly 100,000 students. That is a 36% annual rate of growth.

During that time period the model of actually ensuring that mid-cycle reviews, the regular reporting, the data and the specific objectives for those metrics that we have, the evaluation of our new programs that we've introduced, the growth of our faculty and insuring the credentialing and the subject matter expertise of them as well as our curriculum advances throughout that time period has ensured that while we have grown at that accelerated pace we have maintained, if not really improved the

quality of our programs.

Such that today, just even in the last 3 years alone we have increased our 6 year grad rate by more than 50 percentage points that we today also see that our employment outcomes and the readiness of our graduates are also achieving high standards for excellence and quality. So I will end my comments there and just recognize the Northwest Commission's ability to adapt to our unique and different model and the students that we serve in the design approach that we've taken to do so, thank you.

MR. YARLOTT: Good morning, Chairman Keiser, members of the NACIQI Board here. My name is David Yarlott, Jr. President of Little Big Horn College, a tribal college in Crow Agency, Montana.

I'm also proud to say that I'm an alumnus of Little Big Horn College. It gives me pleasure to share with you a bit about the institution I serve. Little Big Horn College is a public 2-year tribal college located in Crow Agency, Montana, the heart of the Crow Indian Reservation in the south central part of the state.

The Crow Indian Reservation covers about 2.28 million acres, mostly in Big Horn County, an area that is approximately 90 miles east west and 60 miles north south. In 1972 the Crow Central Education Commission was formed to

mostly promote care, development and educational members of the Crow Tribe.

Little Big Horn College was established in 1978 under the Tribal controlled Community College Assistance Act. LBHC chartered by the Crow Tribe of Indians in 1980 began offering college-level courses in 1981 with 32 students enrolled. Little Big Horn College gained accreditation from the Northwest Association of Schools and Colleges in 1990.

Accreditation was last re-affirmed in 2017 by the Northwest Commission on Colleges and Universities. In 1994 Little Big Horn College along with other tribal colleges were granted land grant status, becoming known as the 1994 land grant institutions.

The original facility in 1980 was an abandoned Agency home, two trailer buildings and a garage located in the original town side of Crow Agency. The second location 1981 was a wing of the community action program near the Crow Agency elementary school.

The college moved to its present location -- an abandoned tribal administration building in 1983. Since then we have added five other buildings -- the last building completed is the Health and Wellness Center in 2011.

Little Big Horn College is autonomous from the Crow Tribal Executive Branch in its governance. The Board of Trustees in 2017 has adopted a nomination and appointment format in selecting new members.

Little Big Horn College offers six Associated Art Degrees, four Associated Science Degrees, one Associate of Applied Science Degree and 8 one-year certificates. Average student enrollment over the past 3 years has been 93% enrolled Crow tribal members, 5% being from other American Indian tribes and 2% non-Indians.

Little Big Horn College has 12 full-time faculty members and utilizes an average of 20 adjunct faculty each academic year. The first graduation class in 1984 was three students. LBHC had a peak of over 400 students in 2004, but currently typically average around 275 to 300 students. We typically graduate 50 to 70 students annually.

Currently Little Big Horn College doesn’t have dormitory facilities although plans include student housing for the future. The majority of the Little Big Horn College students live on the Crow Indian Reservation. The majority of the students commute distance -- the community is an 80 mile round trip at its furthest location.

Fort Smith is a hundred mile round trip and is a 210 mile round trip. The nearest cities of any size are Billings -- 65 miles to the northwest and Sherdon, Wyoming 70 miles to the south -- both cities on the I90 route.

The Crow feel that one major resource that can lay the foundation for economic social and cultural well-being is education. Little Big Horn College has given Crow people optimism for the future stemming from the hope that Little Big Horn College can bridge the gap between the Crow culture and mainstream society.

The Crow tribal members feel that Little Big Horn College is the vehicle that will finally carry them out of the low social economic environment of the reservation though through good education. The Crow tribe has successfully retained most of the traditions with the language still spoken by approximately 70% of the tribal members.

What I have shared is a brief introduction to Little Big Horn College. We are one of 7 tribal colleges located in Montana. The tribal colleges located in the State of Washington and another in Alaska. The main tribal college is set among other universities and colleges within the Northwest Commission and College and Universities accreditation region.

Our individual colleges are unique in that our colleges were established to serve the people of our communities. Although our tribal nations have some similarities the tribal nations are not the same.

The mission at Little Big Horn College are reflected in their three core themes. Our missions are to prepare our students to transfer to universities, to prepare them for the work force and to enhance the Crow culture and language.

Every student that is seeking to graduate from Little Big Horn College has to take two Crow studies courses of one of them being a Crow language class. At Little Big Horn College we are very appreciative of the Northwest Commission on College and Universities. The 24 eligibility requirements, the 5 standards, provide a guide for Little Big Horn College to meet all criteria in functioning as a credible institution of higher education.

Within that appreciation is the Northwest Commission staff, evaluators and Commissioners recognize the uniqueness of tribal college in how tribal traditions and cultures are embedded throughout our institution.

I do want to share that one incident where Little Big Horn College was placed on a sanction regarding our governance. Without going into a lot of detail Little Big Horn College

governance transformation to its current state has taken over a 17 year period.

In 2001 Little Big Horn College was placed on probation. The tribal government interfered with Little Big Horn College personnel issues, taking action to remove the President from the Little Big Horn College duties. The tribal government leaders being informed that their interference had placed Little Big Horn College on probation took steps to correct that error.

A resolution was passed to acknowledge the arms relationship between the tribal government and the college. The Board of Trustees for the college continued to operate similar to a tribal committee as they were originally formed under the Crow Central Education Commission.

They operated as the group that was responsible for hiring and firing of the Little Big Horn College employees. Continued guidance from Northwest Commission brought trainings and useful consultants eventually convinced Trustees that they were policy makers, not administrators.

The policies were amended to authorize the President to conduct daily duties including personnel action such as the hiring and firing. Most recently the Trustees passed a motion to eliminate the biannual elections to change to a

nomination appointment, selection of Trustees.

The process however challenging they may be at times, are much appreciated. The accreditation process has aided us in improving as a tribal college and I thank the Northwest Commission on College and Universities and thank you National Advisory Committee on Institutional Quality and Integrity for allowing me to speak briefly and allow me to please introduce our Chair, Joe Brimhall.

MR. BRIMHALL: Thank you, good morning Chair Keiser, members of the Committee. Since the last time we were reviewed and as part of our preparation to hire a new President we've engaged in listening sessions with the member institutions in our region to hear what we are doing right and what they would like to see change.

We found widespread support for seeking a collaborative forward thinking visionary and innovative President who would be a respected voice and thought leader in the regional, national and international conversation for independent accreditation in the rapidly changing higher educational landscape.

While we searched for a new President we made important changes to our technology infrastructure to better interface with institutions, the public and other agencies. We

1 improved our website and are using it for me for ongoing
2 connection with our members.
3 We instituted a portfolio or staff liaison system so
4 that our institutions would have more direct and ongoing
5 relationships with specific Commission staff members. We
6 created rubrics to assist with evaluation of standards and provided
7 models of excellence and models of excellence reports to support
8 consistency across teams and to promote clarity for our institutions
9 as they went through the process of accreditation.
10 All of our regular training programs for evaluators
11 and institutions preparing for reviews continued. We revised our
12 by-laws to establish standing committees of Commissioners and
13 institutional representatives.
14 The functionality of this new system was
15 demonstrated during this transition period by our ability to quickly
16 respond and modify policies that Dr. McKissic brought to our
17 attention as needing improvement.
18 Also, we improved our substantive change policy
19 and procedures aligning them more closely with federal
20 requirements. Most importantly, we hired Dr. Sonny Ramaswamy
21 as our next President. He brings a compelling, heart-felt and
22 intelligent voice about the importance of higher education and his

crucial role in society.

He has a deep passion for helping students reach for their aspirations through higher education. Borne out of his own personal experience growing up with the support of a widowed mother determined that her children would experience a better life, he is committed to student success, high academic quality, accountability and innovation. He has a proven record in creating collaborations and thriving partnerships with academic institutions and corporate and private sectors.

He brings exceptional experience in working with legislative and executive branches at state and federal levels. We believe he has the values, vision, knowledge and experience necessary to guide the Northwest Commission to meet its mission as our next President. It's my pleasure to introduce our next President, Dr. Sonny Ramaswamy.

MR. RAMASWAMY: Thanks very much Dr. Brimhall. Good morning Chair Keiser and member of the Committee. Excuse me, I've got bad allergies and my voice is almost gone but I'll try to make some very brief comments here since we've already heard Dr. Moore and the two Presidents speak to their institutions as well.

And for the record my name is Sonny Ramaswamy

and I was a Presidential appointee in the federal government over the last several years. I'm an academic, I've served in academia for 30 years at multiple universities in America and as a Presidential appointee I served both in the Obama and in the Trump Administrations and it just wrapped up my term just a couple of weeks ago. And I start at my new position the 1st of July with the Northwest Commission itself.

And Dr. Moore in her comments referred to the fact that the Commission is really looking at utilizing performance based output measures and management based approaches in how we work with students. And so for me, and I think for the Commission itself and for all of us sitting at this table and across America, students are at the core of everything that we do.

Were it not for the students we wouldn't be here and I think we have to take that into consideration as we think about how we go about addressing the challenges that we've got -- whether it's the graduation rates, or the default rates, or the cost of education or the young people are indeed getting the knowledge and the skills to be able to find jobs and things like that.

And that's really, really important. So I look forward to working with the institutions, with the U.S. Department of Education, with NACIQI and the other accreditors in coming up

with best practices on how we might make sure that at the end of the day that we protect the interests of those young people that we're here to serve.

And my experiences have been about accountability about transparency, about data-driving decision-making processes as well. I was appreciative of Vice Chair Wu's comments earlier that he's a fan of data. I'm a big fan of data as well. And I think that anything that we do needs to be based on evidence and data and we've got to make the decisions.

Again it's an honor to be here. I look forward to working with you in the future, particularly with my colleagues with the Northwest Commission, thank you very much.

CHAIRMAN KEISER: Well thank you very much. We're now at a point where we have the Primary Readers to ask questions if you have any questions. Ralph?

MR. WOLFF: I'll begin. Thank you all for your presentations. I would say that you have set a new standard as the number of representatives from an Agency that others may -- I'm not sure if they choose to emulate or not, but thank you all very much for your presence here and your different roles.

I appreciate very much your -- the variety of your presentations and it helps us understand where you are the changes

that you've made and the transition that you are now facing. I have a number of questions -- not so much concerns but just trying to gather more information.

One of the things I must confess I didn't understand in your standards was the term "core themes" and you asked each institution to identify not only its mission but its core themes. I didn't see a definition and so is that research teaching or -- I didn't understand what that meant and perhaps you can give an explanation -- a brief explanation of that?

MS. MOORE: I have difficulty saying this with a real straight face. Transparency is not one of our sins, I will say that. In terms of our functioning -- core themes, the way I usually describe them is they're like chapters in a book so the title of your book and then you would have various chapters to explain who you are.

Often they're aligned with an institution's strategic plan but strategic plans are aspirational so there's danger there because we're saying it's who you are now. I believe President Yarlott gave an example of theirs but quite frequently as you would guess they're about student learning, student success, whether it's work force development, transfer rate, graduate school, acceptance.

But we do -- it allows our very diverse institutions to tell us more who they are and how we should be judging them, did that help?

MR. WOLFF: Thank you, yeah it did. Perhaps a glossery.

MS. MOORE: Yes.

MR. WOLFF: Would be helpful. As you're painfully aware I'm sure Marylhurst College has announced its closure. I'm curious it is not as I go to the website there is no information about the closure on the website, nor when I go to the directory there -- it would appear that there have been no challenges -- there's no public information about any repeated actions, review of their financial data or anything around enrollment declines or the like.

So perhaps you could identify what relationship you've had and what position you are taking with respect to the closure in terms of assisting students and the close out process, assuming that the close out continues to completion.

MS. MOORE: Well it's always a painful decision for an institution to close for all of us and again we're a very close community so the institution was not in trouble in that sense. They were not under financial resource review. One of our standards is

sustainability and an institution has to show that it is sustainable into the near future, it can continue to do what it's doing.

With the decline net tuition revenue, with their endowment they did not see a way forward that they were going to be sustainable. They were projecting 6 million dollars in debt at best every year -- that wasn't a sustainable model. They chose to close while they're strong, while they can still provide for their students to finish out the year.

They contacted us immediately, we are working with them on the teach-out plan. There is grieving, there is grief, there is protest from students and faculty as one might expect but I'm sure that it will not be the last small college that will have to deal with these fiscal realities but the institution was not in trouble.

A special report which on our website, they just had a special report was having to do with their website and they're presenting the clarity act requirements on their website and so we had to have them do that. I will also that our website could use improvement -- the same thing, it shouldn't be that difficult to find this information.

MR. WOLFF: I would certainly concur was one of my issues I found your website opaque and very incomplete but more comments on that. But I do think and just would urge that I

1 just looked up NEASK with Malneida and they had a public
2 statement and I know this is quite recent but it would be I think
3 helpful for public and those who have questions for your
4 Commission to work with the university on the role that you will
5 play and public information about that.
6 I did also wanted to ask -- one of our issues, we
7 heard the data presentation this morning and I think both of the
8 institutions that you all presented -- I went to the scorecard and so
9 WGU is listed as 16% and I know that it doesn't represent the
10 students and Little Big Horn College is listed at 21% completion
11 and I'm curious to know given that the CRAC role that all of you
12 have been working at the regionals on looking at completion -- that
13 this information may be quite misleading.
14 So how do you addressing in the review process the
15 issues of completion and the problems of getting good data, when
16 IPEDS data, particularly for both of these institutions seem to be
17 inappropriate or incomplete -- let's put it that way.
18 So it's partly a question as much for you as a review
19 as it is for the institutions in getting clear about what's appropriate
20 information and how to conduct a review around what is an
21 appropriate level of completion -- they were talking about at some
22 point having benchmarks, but I know without good data it's really

hard to establish it.

MR. PULSIPHER: Yeah I would offer -- first you were correct in the sense that that reported data, particularly the IPEDS data is willfully inadequate -- it represents the student outcomes for WG simply because that reports that number that you quoted I believe is the first-time full-time which is I think truly like 3% of our student body.

In fact it is an admission requirement that you have previously had some college but no degree -- some of that college may have been done at high school level so that's likely to represent that 3% that got admitted to WG that had -- that were first-time full-time students.

I think the important thing -- there was a question asked this morning as it related to the overall data is one thing that every institution I believe -- especially WGU we obsess about is we do think about the overall team and rate of those students that begin in a cohort.

So if you want to look specifically at a point in time whether it's two years, three years, four years, six years, eight years, whatever point it is -- what is the definition of attainment?

For us, it's pretty simple -- we think very specifically given that we offer Bachelor's and Master's Degree

only we specifically think of graduation rate. Of those students that started whatever time period ago, of that cohort, how many have actually attained their degree or completed their degree -- two, three, four, six or eight years later.

And for us in particular, we are focused more on our 4-year attainment rate simply because of the fact that two things are unique to our students. One they transfer credits in so they shouldn't really be taking 6-years -- second, we also are competency based in our design and those of you that are familiar with competency based design you can actually advance as soon as you demonstrate competency or proficiency in the learning objectives.

If you do then you can actually complete courses at a faster pace than you would in a traditional credit hour or seat time based model. So with that being said I think that we specifically with the Commission work on identifying all the student success measures that we utilize as an institution.

I would put those into a variety of different categories but four in particular. We do have measures of quality to insure that we are forever -- one of our core themes for example is advancing the quality and relevancy of our program offering so we do have quality measures to ensure that our students are

achieving credibility upon the attainment.

Second, we focus on progress measures meaning are students maintaining pace towards an on-time graduation rate? We also then look at graduation and attainment rates and ultimately we also look at satisfaction overall -- those are the measures that we track for virtually -- not virtually, we wholly track for every single student, every single cohort that we have beginning at the first of every month and we are forever trying to improve those.

I personally would say I'd hesitate around establishing a certain standard or bar that you need to achieve versus progress. Are you forever improving the, you know, the attainment rates for those key measures for the institution? I like those more than having a set standard because of the difference in the student body the different institutions serve.

MR. YARLOTT: I just wanted to make a comment also. At Little Big Horn College part of our problem is that we're not part of the National Student Data Clearinghouse and it's hard to track our students because of our low economic environment that if there are jobs available our students leave to find employment and then a lot of our students do transfer out before they complete their degrees at the Little Big Horn College.

So in that process we're trying to improve our graduation rates. We have become members of the Achieving the Dream which is really helping out our students because of the emergency aid program that comes in where we're a commuter college and if somebody is unable to come in, this emergency aid is able to provide gas cards for them so they can make it to class. So this is our first of year of using the Achieving the Dream, so we're hoping that those numbers would improve.

And that we're also visiting with the Montana University system which they have adopted a Complete College American initiative and tribal college is not being part of the Montana University system. We did get invited in to see if we would be interested and we're really taking a hard look at it right now.

MR. WOLFF: I know that -- I don't know if you want to, sure go ahead and then I'll come back. I have more questions too.

Well I wanted to ask Dr. Moore if following-up on that I know that you have a Financial Monitoring Committee and you talked about doing a lot of the monitoring. Have there -- are you monitoring completion rates in the same way in terms of have you identified any institutions where you've said that the

completion rate -- given all the data variabilities needs more monitoring, needs improvement?

I mean is that one of the areas of focus the same way you've been focusing on assessment of student learning and outcomes?

MS. MOORE: Absolutely and that's something that's reported in the annual report where we look at retention completion and the graduation rates. I think -- again this is my first and only time here but I'm not sure if I'm supposed to mention someone by name -- I guess the article was out yesterday about one of our institutions in Nevada that has a very unacceptable completion rate.

I can tell you that we visited them in addition to their regular cycle, we visited them 2015, another special review in 2017 spring -- placed on warning, another visit in spring 2017 -- they are doing incredible things. I mean they're working on it and it won't show up in the cohort graduation rate for a while, it is starting to show up in the retention rates, but they're doing all the things that we know work.

The engagement of students that are advising the peer mentoring-type things -- the main things that have been proven to help retain students and to encourage them -- so we've

visited, we've required reports, they're doing what they can do at this point. They, as you might guess sort of a student population that's not well prepared for college -- again, bridge programs and a very diverse population.

So that would be one specific example but we do know all of our 14 institutions that are below the level we've been on.

MR. WOLFF: Just one final question for now, and that is your website, as I mentioned earlier -- even for example the staff aren't even identifying where they earn their degrees -- it just is so broad in general, public information is very difficult to acquire about probation actions or warning.

I'd almost went through every institution in your directory to find out where are there sanctions and had a hard time I will just say. So I -- Dr. Brimhall had mentioned that you're working on you -- we did some work on the website but I would urge that there's more to be done to become more transparent.

On the positive side I appreciated the innovations that you identify in your website about what's being done well at your institutions but around the accreditation side and the public accountability side I think it would be much more helpful to have more of your accountability issues given front and center

transparency.

MS. MOORE: I agree, should we make that a recommendation to the new President?

CHAIRMAN KEISER: John then Simon?

MR. ETCHEMENDY: Yeah, I'd like to follow-up some of Ralph's earlier questions to Mr. Pulsipher I guess. You have a unique position because you are the pioneers particularly of really heavy use of competency based measures.

And I'm curious and because of that I would like to think that you have a responsibility to try and tell us whether or not these are working or not working and so I have a couple of questions. One is just a brief question -- the graduation rate that we have is obviously completely misrepresents your institution because it's the first-time full-time and you don't even require -- I mean you don't even allow non-first-time students -- the first-time students in general to enroll.

But you didn't mention what your own measures are so that's the first question. And then the second question is it seems to me that you are in a unique position to do something that most universities can't because of the fact that your students -- virtually all of them are employed prior to entering Western Governors.

Many of them stay employed while they take the courses and then they graduate. So the other piece -- the data point that concerned me was the median income of your graduates which was 38,000 which was not very high. But you have the opportunity to do a before and after study. Have you looked at the median income of your incoming students and compared it to the median income of your graduates?

And it seems to me that that is an obvious question to ask and a crucial question to judge whether or not the competency based approach is actually successfully helping the students in their -- in their careers?

MR. PULSIPHER: Thank you for that question. You're absolutely right and I didn't want to inundate all of you with the amount of data because this is one thing that we fundamentally believe in that in fact, any innovation that -- to be in fact qualified as innovation it has to have measureable impact and so here comes the data.

So to your first question as it relates to grad rate, our current grad rate on a 6-year basis is 50%. Our 4-year rate is 42%. The 6-year rate is already projected to be close to 54% within another three years and there are lots of reasons for that.

One thing I will just point out to you is that even

with the advances and the updates to the new college scorecard to allow for non-first-time full-time, the freshmen dating on that for us is a real problem because in particular the data that was referenced for the first-time full-time, that's literally from a cohort that started in 2009.

We matriculated more students last year than we had total enrollment in 2009 and so we actually have a very rapidly changing set of metrics simply because of our scale that has been advancing so significantly.

So currently we're at a 42% 4-year grad rate which if you compare that to the national average for all institutions it's 36%. The national average for a 6-year grad rate is 54%, we'll be at that or above that within another couple of years just because you can see our 4-year grad rate advancing.

Another key point to you -- ultimately we look at two key outcomes. One as an institution we look at the attainment of the credentials -- so those that actually come in and actually intend to learn with WGU how -- what percentage of those are actually achieving the credential.

The other key outcome that we measure is having achieved the credential are you achieving the outcome that you expect that credential to be a path to so let me give you some of

that data.

That of the graduates that graduate fully 89% of them are employed full-time in field of study. You can breakdown of all those graduates that complete roughly 50% are advancing in their current career, 25% are changing career, 25% are actually achieving their first career or their first full-time opportunity.

The number you quote I don't know, that's actually closer to what our reported current pay level is of our incoming graduates. Based upon heir surveys and pay scale surveys and others which by the way we pay for and do ourselves because there is no national standard for this -- our graduates are earning $21,400 more within 4 years of graduation than they did at the time of graduation.

By the way comparatively to that number on a national basis that number is about $10,000 for all -- $10,000 more within 4 years of graduation nationally versus our graduates are $21,200.

The other key thing I would point out is that our employers -- you know 98% of them say our graduates meet or exceed their expectations fully. 94% of them say that our graduates exceed their expectations.

Keep in mind too that on average our Bachelor's

graduates will complete in less than 2 and ½ years at a total cost of about $15,000. So within 4 years of graduation they're earning over $20,000 more, they're average age at graduation is 37 years old. You were talking about another 25 years that they're going to be earning well over a half a million dollar on an investment of only $15,000.

So is it working -- I think the short answer is yes. The reality is -- is that our students and our graduates and alumni know that. That's why even those that matriculate today north of 50% of all matriculates today are referred to WGU because of employers, graduates, community colleges, et cetera.

MR. BOEHME: Great, well as you may or may not know I enjoy asking regional some questions because I think regionals are such an -- how the current system is set up regional service is such an important gate-keeper for various reasons but I also think that sometimes regionals have not been on top -- had been aggressive enough in protecting taxpayer dollars and in the interest of students.

And I have to say for Northwest I really do appreciate your 7-year cycle. If I'm correct you have a self-report requirement of the first year, the third year and then the seventh year which I think is wonderful.

I'm going to ask you a question about Western Governor's which recently went through an audit by the Inspector General that found it was non-compliant with the requirement for regular and substantive interaction in distant education programs because it uses course mentors, not subject matter experts, is that correct?

MR. PULSIPHER: That's actually not correct. Just to be clear what the OIG's opinion was is that they deemed that our students did not have regular or substantive interaction and their application or interpretation of the legislative law.

But we actually have three student-facing types. We have course faculty, we have program faculty and we have evaluation faculty. What is absolutely true and the Commission actually identified and actually proved this is that all of our faculty actually meets standards for subject matter expertise above the course and program level.

We've also shown that in data that all of our course faculty have terminal degrees as well as all of our program faculty have Master's Degree or higher -- 90% plus 9 years of experience in the field or program of study.

And so there's no evidence to the contrary that our faculty do not have the required subject matter expertise.

MR. BOEHME: So are they called course mentors or?

MR. PULSIPHER: That's one -- that's the course faculty, that's the course faculty yeah.

MR. BOEHME: And so, and thank you for clarifying that because my question is to the incoming President of Northwest and/or any Board member or obviously WGU's President, is to what extent would if the -- it's my understanding as well the Department of Education may be doing some types of changes about what this regulation rule may be. This rule may not exist as the current administration seems to be rolling back quite a few policies.

So I was just wondering if Northwest would take -- tell me kind of as you look and as you plan towards the future, what kind of opinions or what you guys are thinking around distance education so you know, is it in line with what the Inspector General has found?

Are you going to have a committee on distance education? Just kind of a broad -- you know I don't need a long thing just kind of curious about this because this has been in the news recently and I'm intrigued by that because I don't know if Ricky -- no, okay.

MR. RAMASWAMY: Well I just want to say it would be completely presumptuous of me to tell you that I have an answer on this already. You know, I'm a newbie and I'm still trying to learn and I think my short answer to you is that your point is very well taken and I'd work with the Commissioners and the institutions in coming up with a path forward assigned to it.

MR. BOEHME: So also another question too is the Center for American Progress came out with a report and put SACS and Northwest in I quote, "The most open ended for student outcome standards."

And I had the chance to look through your standards 1-B2 and 4-A1 that there are very -- when comparing characteristics of other regionals Northwest had -- this is the interpretation for the Center for American Progress and I'd love to hear your perspective on this.

There were no common characteristics in terms of the student outcome standards in terms of requirements focused on specific outcomes, requirements for demographic, dis-aggregation and includes success after graduation, required goal settings so one -- because most of it is enabled or because your standard really permits the institution to kind of create those old -- to create those standards, can we anticipate -- can we expect that Northwest will, I

1 believe, hopefully fall in line with what WASC and even I'm going
2 to compliment New England -- ACCJC where there is some --
3 what I would call more strict standards or not as open ended.
4 MR. RAMASWAMY: I appreciate the question
5 and I read the report as well and I actually appreciated all the
6 comments that were made by Antoinette Flores in that particular
7 article and I certainly would take that into consideration and -- and
8 those are all, you know, in terms of disaggregating the data is
9 really, really important and in fact we heard from Brian Fu earlier
10 this morning as well that for example in next steps, socio-
11 economic components as well.
12 These are critically important for us we absolutely
13 must do it and again as the conversation opener to get into we'll
14 develop a path forward.
15 MR. BOEHME: Okay great, and then one last
16 question is how -- for your new term which we're excited about
17 and I just want to reiterate Ralph's comments about transparency
18 on the website I think that's one thing we're looking forward to a
19 new website is how do you plan to involve students and then I'm
20 done.
21 MR. RAMASWAMY: So you know when Mr.
22 Wolff asked -- made the statement about the transparency and the

website it was like to invoke the amenable Yogi Berra it was deva vu all over again. The Agency that I headed in the federal government we were very opaque, we had no information. People didn't know what we were doing and yet we're spending 2 billion dollars of taxpayer money for research and education and things like that.

So we, you know, it was the market based focus groups and things like that and developed the website based on that -- on how to make everything transparent and absolutely I make a commitment to do that.

MR. BOEHME: And then just how would you involve students and then I'm done.

MR. RAMASWAMY: Yeah, and the second thing is I've been an academic and even in our -- in my former life for 30 years I was at multiple universities and the Advisory Boards that I have had as a Dean as a department head et cetera, I've had students involved in that as well.

And I think that's again you made mention of that earlier this morning about having student involvement that's critically important. You -- you commended the ACEND folks on that and we'll certainly look into that as well. How do we go about doing it is the question that needs to be asked.

You know we want to be representative and yet we want to make sure that it doesn't impose on young people's time either.

MS. DERBY: Certainly Western Governor's has been a pioneer in many ways and so I think we're particularly interested in the data that you've shared -- thanks for sharing that. I think that was a good question from John and I appreciate what you had to say. I'm curious about your -- the competency based and all internet and teacher practicum -- how do you manage those?

MR. PULSIPHER: Yeah as you might imagine we probably place more students into practicum than virtually any institution out there. On teacher education programs alone I think we placed north of 3,000 individuals into their demonstration teaching both in the fall and the winter rotations.

In addition to that our nurses and our licensed health profession programs the design of which we effectively maintain relationships with a very broad range of on the health side with hospital systems, with community health centers, with practice sides -- those individuals are also a part of if you are you could I think loosely refer to them as adjunct faculty because they are part of our coaches that in fact observe the applied learning of

our students into their practicum.

And they are clearly evaluation assessment designs that we have for them for that portion of the programs. We do the same thing with the teachers in the school districts into which we place our teacher education students into their demonstration teaching.

So the evaluation of that is not even just time based, it's actually time based and applied learning based which is we observe through that coaching network that we have both the "did they complete the actual hours required" as well as "how were they assessed on the demonstration of the learning that they've had from their courses".

I had mentioned too that this is actually part of the required curriculum as you might imagine for the licensure program itself and so while we teach everything at distance from the courses et cetera, the practicum is integrated into our program so it is not in a very tight or narrow definition of distance. Not everything is in distance so they have to have it.

MS. DERBY: Thank you.

MR. O'DONNELL: Thank you Mr. Chairman, President Pulsipher I always appreciate hearing about WG's innovation. I have a question that relates to all but it's really

specific to the Commission and the Inspector General's report. I have a couple of questions.

My first is when you learned about the Inspector General's report what actions did you take after learning about that?

MS MOORE: We immediately reviewed -- we had just reviewed Western Governor's University in 2013 and 2017 and we had peer evaluation teams there who wrote reports and specifically examined the faculty -- that was the issue the disaggregated faculty model.

And we went back and as President Pulsipher pointed out we looked at their model very hard. We looked at the evaluation team's assessment of that model and we looked at the learning that they were showing and as I said in my beginning comments our bottom line is student learning which we believe rolls up to student achievement.

And it was there -- so then we wrote a letter for you I believe as one of the things that we did in terms of a specific action. Am I getting to your question are you --

MR. O'DONNELL: You did answer my question I guess I'm curious if you know that an institution may be required to pay back over 700 million dollars, did that raise questions about

financial solvency -- would be one question.

Another question -- there's nothing on -- that I can find on your websites that would provide notice to students that there's any questions had been raised. I noticed in your accreditation handbook it says that you're actually required to respond to the Department of Education which may be a little Goldberg-like.

If you are aware of any institution that may be failing to meet its Title IV ATA program responsibilities and the Inspector General report may lead you to believe that there is reason -- you may not agree with the report and I'm not trying to get into the merits of the report.

I'm just trying to understand how when you look at an institution and there's, you know, something as strongly worded as an Inspector General's report -- beyond writing a letter supporting the institution are there other steps that you should have taken regarding financial solvency, making students aware that there may or may not be issues with the institution?

MS. MOORE: We basically well WGE has a very thorough description of the situation on their website which we have connected to. I will also say perhaps it's more the individual approach. We have received questions. We've received questions

about accreditation at WGU. We respond to those questions. We are open about what happens, what is going on there.

You mentioned another -- oh, of course we get the audits from -- of other institutions whether it's a Clery Act or Title IV funds, how well they're handling the return of the funds -- those are always part of our Commission review of the institution and they are part of the information given to an evaluation team. I will absolutely not get in the point of defending our website. I'm sorry, it's better than it was -- I will tell you it has made progress but I -- certainly your point of public accountability whether we're talking about Marlyhurst closing or any other news item is very well taken.

MR. PULSIPHER: If I may I'd just add to that to the point of clarity is we are very transparent about the audit itself. We, as Marlene noted, that we provide ample information about it on our website, making the auditor's report available, making our response available to it, providing all the information that students may want to have about it.

We also inform them in fact, an auditor actually has no enforcement authority so despite their opinion on it, this is the opinion of WGU -- this is the opinion of our creditor. We've long been compliant with legislation.

I think to the earlier question to is on this particular point is but I think I don't want to speak for the Commission but I believe that both they and we actually just don't, you know, just because they have an opinion doesn't make our opinion wrong.

We're doing our best to make sure everyone is informed about that opinion but ultimately they have no enforcement authority and now it's been the Department's process to make sure that that gets resolved accurately. My own sense of giving the process that we've had too is that they're learning what the, our -- what the Commission Northwest already knew about the credentials of our faculty -- their engagement with our students and everything else whereas the auditor is not anywhere near reviewed it to the same degree that Northwest has.

MS. NEAL: Well, welcome. It's good to see you again. I think we're all growing old together. I feel I've seen Northwest many, many times. And I just want to follow-up a little bit with what Simon was talking about because over the years I think regional accreditors which accredit the vast number of students across the country have certainly been a critical focus of mine.

Because I think as we look out at the vast universe if we have a crisis in the cost and quality and student learning

outcomes and even free speech on college campuses -- and I think we do, then I must confess I think we have to point to the regional accreditors as part of that problem.

So having said that I come today within that surreal feel that I have often when I come to NACIQI because the report I receive regarding Northwest which oversees nearly a million students is a two-pager that basically says everything's okay.

And that you should be renewed for 5 years and there's really virtually nothing to look at. And so I -- I wanted to raise concerns that I've heard earlier about the continuing self-referential nature of the standards of Northwest and how I as a member of NACIQI, how can I make sure that you're a guarantor of educational quality when I look at your standards and it's hard to determine if they're there and I'm reading on the general education component of undergraduate programs demonstrates an integrated course of study that helps students develop the breadth and depth of intellect to become more effective learners and to prepare them for a productive life of work, citizenship and personal fulfillment which is a very nice statement.

But at the end of the day I don't know looking at the materials provided and looking at the data provided whether or not the graduates of the institutions that you oversee, no how to write,

1 know how to understand math, whether or not they basically have
2 the capacity to function as -- as good citizens and so with the lack
3 of any baselines and open-ended nature which Simon referred to, I
4 guess I always fall back on the grad rates.
5 And we've all talked this morning about how
6 imperfect they are but in a less than perfect world, I go to those
7 grad rates and as you all know I have in the past voted against your
8 certification and I have said that on the basis of looking at that --
9 those grad rates which are about all that I'm able to grasp given the
10 lack of -- of lines in your standards and based on a review the
11 average 4-year graduation rate for the 2010 cohort is 31% which is
12 under the national average.
13 The average 6-year rate for the same cohort was
14 50% again under a woefully low national average. 7 schools
15 reported 4-year graduation rates below 10%, 39 schools reported
16 rates below 25% and we all know that that's less than perfect but
17 it's -- in terms of first-time full-time and transfer but yet it is still a
18 very, very low set of numbers.
19 And so faced with this I find it difficult to be able to
20 say that you are providing the kind of accountability and assurance
21 to students that accreditors should and I would just like for you to
22 address my concerns.

MS. MOORE: I need to clarify then that you don't see our full report with all the exhibits is that correct?

MS. NEAL: I definitely see the full report with all the exhibits and it's a lot of paper.

MS. MOORE: Okay, because of course it's there that you see the actual application of those standards and what is actually set up by each institution is meaningful verifiable indicators of student learning for all of these various things that we value -- because I agree, they're very broad statements taken out of their application and out of context of the different institutions.

But certainly we provide a lot of paper that evidence -- I think probably one of the real disadvantages of not making those reports public is that we have so many wonderful stories to tell and I do think that public credibility would improve with more exposure, not less because these institutions are doing an incredible job of educating students, meeting them where they are and bringing them to the same high bar of expectation.

So the standards are up for review, they're to be reviewed every 8 years as part of our cycle. Next year is the year for them to be reviewed. I think you've already heard our incoming President saying that there will be changes. I think that as the outgoing President or short-term President, I would say the

same thing.

I think clarity, transparency would only benefit everyone.

MS. NEAL: Well I certainly appreciate that and I know that you have pledged to do better in the future but I cannot vote and make my assessments based on hope over experience and so that's where I find myself.

MS. MOORE: And I would just answer that I think that that is in the reports. It does have to be dug out, thank you.

CHAIRMAN KEISER: I'm going to ask a question, then it will be Frank and then it will be Simon, okay? Again I appreciate this. I truly believe most of your institutions are doing a fabulous job and that's important and it's critical for American Higher Education however we also have responsibility when the government's involved -- especially in the funding of this -- of these endeavors that there is quality at the end of all the programs or at least certainly those that are at the bottom part of the bell curve are meeting at least some kind of minimum standards.

And that's what I'm not hearing and that's the question that I have. When have you taken action against an institution for very poor outcomes?

MS. MOORE: My answer to that is we take action continuously. If you're saying, you know, that over the past 5 years we had one school on probation and 5 on warning that that's not taking action, that's a different answer.

My answer is that we really look at the welfare of the students and we intervene and say what you're doing isn't acceptable.

CHAIRMAN KEISER: That's not the question. I'm sorry, again, I'm trying to get to a more specific answer. In Western Governor's they said 3% of their students would fit into that number that the Department reports in IPEDS -- well that's 3,000 students if they have 100,000 students.

3,000 students is a large group to look at that has a less than 20% graduation rate. When do you say enough is enough? When do you say you're not meeting your mission or in the case of Western Governor's -- if they're now establishing the baseline being placement or student success and I think the question that Frank brought -- or that Ralph brought up was fairly low entry level salaries for people who are already in the field.

And when do you question and when do you say there is a limit to us saying that this -- you're not being successful with your students?

MR. PULSIPHER: Sorry, can I just clarify on that? Just to be careful you can't apply a cohort rate from 2009 to our current enrollment so you're literally talking about a couple of hundred students.

CHAIRMAN KEISER: Again, I'm not picking you specifically. I'm just saying that if you have 100,000 students at 3%, that's what you said your rate is so I would assume it would have been the same today.

MR. PULSIPHER: Our rate today is 42% and 50% 6-year grad rate, so across the whole of our enrollment.

CHAIRMAN KEISER: I'm back to the question. When, you know, I'm not talking about Western Governor's other than the examples that were given -- when is enough enough? And only one institution has had its accreditation removed then is that enough?

MS. MOORE: If that's the only -- yeah I would say it's a small region and that that's the only one that deserved to have it removed, that is enough.

CHAIRMAN KEISER: Isn't there 1,000 schools that you accredit or close to it?

MS. MOORE: 158.

CHAIRMAN KEISER: What?

MS. MOORE: 158 institutions.

CHAIRMAN KEISER: I thought it was 1,000 so that's still less than --

MS. MOORE: It is.

CHAIRMAN KEISER: Half a percent.

MS. MOORE: Mm-hmm and I would just say --

CHAIRMAN KEISER: The bell curve doesn't work that way usually. It's usually less than one-half of 1%, but okay. The other part is do you have a standard on placement or in case of you know, the schools that use that as a basis for their demonstrating you know, that that's part of their mission?

MS. MOORE: Yes, and that's part of their mission and there is a standard for placement and they would be a benchmark and they would have to meet that.

CHAIRMAN KEISER: Do you use a third party evaluation process to determine that that data is accurate?

MS. MOORE: We would use for example, if we're looking at a professional school that has professional accreditation, we would use their standards for the programmatic accreditation and that has been verified by the programmatic review in addition to the self-report, is that what you're saying?

CHAIRMAN KEISER: Well, but other institutions

that have a job completion or job attainment mission -- unless they have programmatic accreditation do you evaluate the data that they use using third-party evaluation?

MS. MOORE: No.

CHAIRMAN KEISER: No, now I can go back to Frank and then to Simon.

MR. WU: This is really a question for other NACIQI members but if the Agency would like to speak to this that's fine too. I'm just wondering this happens from time to time where an Agency comes before us, we have some questions, it's not anything out of the ordinary but there happens to be one institution within the authority of that Agency that has been in the news.

Typically when that has happened it hasn't been happy for either the institution or for the Agency and so this is just a question for NACIQI members. What should we make of that because on the one hand I don't want to ignore what is out there but on the other hand I don't want to be obsessively focused on one institution among many or give it undue weight.

And it may well be that things are actually okay and that this is some innovation. It may be praiseworthy, et cetera. I'm just thinking about the scope of our authority and how we

proceed so what do we do whereas here this is one institution that has disproportionately been in the news and in third-party conference and so on and so forth and might then sway our view of the Agency as a whole?

And if the Agency wants to comment on that they should feel free.

MR. WOLFF: I just want to comment Frank, I hadn't read the article so when you raised it I wasn't even aware. My concern or my issue I think is one that Frank raised -- I mean that Art raised is your standards really don't -- I'll just make the comment.

Your standards very generally talk about student success. I mean it's very hard to find how and where in your standards the issue of completion is addressed. And I know there are annual reports and data that you collect on retention and graduation.

So I'll just say my question was more generally about where do you set the bar and how do you work with such diverse institutions as the two you represented as well as more traditional institutions and define what is an appropriate level?

There is a point at which you -- any accrediting agency needs to say, "This level needs improvement," and at some

point is not acceptable. And the professional side they can set more clear benchmarks. You have a much more diverse range so it -- I think the issue is not around an individual institution, it's around how does this issue get addressed and there are a lot of gaps within more traditional institutions around disaggregated data and completion rates so it really isn't only those that are more challenging like WGU, it's the whole spectrum.

So I'll just say my issue is really one -- how is this being handled in a responsible way without just setting a single bright line.

CHAIRMAN KEISER: That was the response to Frank's question.

MR.WOLFF: Right that it really wasn't addressing a single institution but a more generic response to the broader issue of completion and disaggregation.

CHAIRMAN KEISER: Simon?

MR. BEOHME: I wanted to -- well for, to Frank's question as a NACIQI member I always think it's important that we look at poor performing schools because I think that's one of the most important indicators within accreditation primarily regionals.

When we look at HLC that has thousands of

institutions and millions and millions of taxpayer's dollars, it's so critical that we look at these low-performing schools and see how people -- I vividly remember a conversation I think it was between John and Ben Miller during one of these policy exchanges and I'm not going to -- I don't, can't recall this conversation but there was this really -- this fascinating conversation about as NACIQI, to what extent exactly to Frank's question do we -- if there's one accreditor that only accredits two schools and one of them is low-performing and one of them is high-performing then we would look at that accreditor and say oh generally, if we just looked at the information, collected their an average accreditor rather than if they do all of these thousand schools and so I still believe that in every situation we should look at these low-performing programs and institutions.

But I wanted to go back to a point that my colleague Anne Neal -- and you take the words right out of my mouth, Anne. But it was actually a comment -- I believe it was from you, Dr. Moore that -- and I'm just interested to see if you would be willing to commit to post all of your accreditation reports and make them public.

It's my understanding still that WASC is the only accredited -- regional accreditor that does that and if you really do

1 believe in transparency and if you really believe in these stories or
2 narrations I would really seek today but maybe, I'm sure with
3 consultation of your Board if you would publicly post your reports
4 or even a summarized report.
5 In Scotland they don't -- they reveal a much shorter
6 version but I do agree with you that I think the one good thing
7 about accreditation is the peer review process. I'm sure there are a
8 lot of great stories as demonstrated -- both great institutions you've
9 brought with you.
10 But I think to some extent, it's also the accreditor
11 that you have to share that information. And we come here and we
12 beg to get more stuff and you know, we want more of this data and
13 we only hear, you know, the Inspector General's reports, but I
14 think it's an obligation of accreditors to share more information
15 with students and also with colleagues within this community to
16 exchange that information.
17 And if accreditors actually really do believe that
18 peer review is the best thing, then regionals through C-RAC and
19 whatever other means should be sharing that information and be
20 more forthright about it rather than protecting it.
21 And because taxpayer dollars are involved,
22 certainly it should be public. It's obscene that public universities

at state colleges still hide some of their reports from accreditors. And so and it's not just Northwest, but if you come to NACIQI you'll often hear me ramble about that too.

But I think if transparency is something I'd really encourage you to think about that.

MS. MOORE: I appreciate that. I've been President for six months, have not accomplished it. I notice the incoming President is shaking his head wildly yes, so I have no disagreement with you.

MR. BOEHME: Okay.

CHAIRMAN KEISER: Jennifer?

MS. HONG: Just real briefly to Frank's point. I would like the deliberations here to really focus on the performance of accrediting agency rather than to get carried away on a particular institution.

To the extent that the institution's performance is a proxy for, you know, calls into question the oversight of the accrediting agency, that is within the bounds of the regulations and the student achievement standard in terms of whether the Agency is applying sufficiently rigorous standards to their institution.

So, just to kind of keep the spotlight on that that would be great, thanks.

CHAIRMAN KEISER: Any other questions from the Committee? Well thank you members of the Commission, I'll bring back the staff member Stephanie?

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

CHAIRMAN KEISER: Herman, you have a comment?

MR. BOUNDS: I just wanted to remind the Committee that, you know, the final staff report only includes any remaining deficiencies. If there are no remaining deficiencies then the report will indicate none. The bulk of the review, of course, is in the final staff analysis I think which you all have access to.

And the other thing I just want to remind -- as far as the Department staff's review, when we get to the student achievement area that's a -- you know, statute says that's an Agency responsibility and the Agency's determination of what that standard should be so we really look at that.

And when we rely on the Agency to establish those standards and publish those standards and if that's the case then that's when we find the Agency compliant in that area. So I just wanted to bring that up, thank you.

CHAIRMAN KEISER: Thank you Herman. Will

the Primary Readers like to entertain a motion, yes Ralph?

MR. WOLFF: I move the staff recommendation to reaffirm recognition for five years.

CHAIRMAN KEISER: Is there a second -- second by Susan Phillips. Discussion -- sensing no discussion all in favor of the motion signify by saying, “Aye”.

CHORUS: Aye.

CHAIRMAN KEISER: Raise your hand -- raise your hand I’m sorry. All those opposed -- 3 -4 -- 4 opposed, try again. All those in favor signify by raising your hand. And all those opposed raise your hands please. Thank you very much. We will stand in adjournment for lunch.

NACIQI RECOMMENDATION

To reaffirm the Accreditors Recognition for five years.

For now, for the public we will be rejoining together at 1:45 however for the Committee we’re going to ask you to run down, get your lunch and then bring it back here and we can restart here in about 25 minutes if that’s okay. Is that -- I know it’s tough but we’ll do it.

No Diane’s going to be with a whole group right? With the whole group at 1:45.

(Lunch - 12:20 p.m. - 1:47 p.m.)

CHAIRMAN KEISER: Welcome back. It's with great delight that I introduce to you Diane Auer Jones, actually she's no stranger to this group as she served under the -- in the Bush Administration in a similar position but you were Assistant Secretary and now is the Special Assistant to the Secretary of Education and she's going to talk to us, Diane welcome.

Reducing Regulatory Burden in Accreditation

MS. AUER JONES: Thanks so much. It's great to be back. Good afternoon and thanks to you Dr. Keiser and Dr. Wu and all of the members of the NACIQI for providing me this opportunity to address the accreditation community.

I wanted to just provide a brief update on the Department's interest in improving the recognition and oversight program ensuring consistent and equal treatment of all agencies and reducing unnecessary regulatory burden.

Secretary DeVos challenged all of us to rethink education. This includes higher education as well as pre-K through 12 education. And the Secretary poses a provocative and a worthwhile charge. We must challenge our current assumptions. We must evaluate our current practices and we must question everything to insure that we do not limit the ability of any student to reach his or her full potential.

And so it's in that spirit that we are examining the accreditation recognition process. Secretary DeVos believes the accreditation recognition process must evolve. It must support and advance educational innovation and it must respect the many different goals that students bring to college.

It also must rely on clearly articulated standards that are applied consistently to all agencies. To begin our internal review of the recognition process, we first considered the recommendations made by the NACIQI, by the Council for Higher Education and Accreditation, by the American Council on Education and by the Senate Task Force on regulatory relief convened by Senators Alexander and Murray.

And the collective thinking of those groups is informing us as we move forward. Our analysis revealed some common themes that we will consider in our efforts to improve the recognition process.

These include calls to restore the separation of duties among members of the triad to provide regulatory focus and clarity, to integrate risk-based review into the process, to eliminate unnecessary minutia, to confine the review to the written regulations, to simplify the recognition criteria and put a higher priority on activities directly related to the student experience.

To honor the autonomy and independence of agencies and institutions, to reform substantive change requirements to enable institutions to respond more quickly to changing programmatic needs, to adhere to the statutory prohibitions on establishing bright line standards for student achievement and to clarify the issues on which the Secretary seeks NACIQI's policy input.

As we review the standards for recognition and the processes used to evaluate accreditors, we are asking ourselves a series of questions that include but are not limited to the following:

One -- which areas of the Department's accreditation regulations and guidance are most directly related to the educational quality a student receives and to the student experience? Which, if any, are ambiguous, repetitious or add unnecessary burden?

Does the accreditation handbook help accreditors understand the Department's expectations or does it muddy the water by layering additional requirements that are not included in statute or regulation?

Number three -- how do we shore up the triad and clarify the roles and responsibilities of each entity? How do we eliminate duplication of oversight responsibilities among two or

more members of the triad to reduce the burden and to ensure that the appropriate entity is held accountable when it fails to fulfill its duties?

How can we embrace and support innovation but do so without exposing students and taxpayers to unreasonable risk? How can we reduce the size of petitions and still gain a comprehensive view of the work an accreditor does and the consistent application of its standards?

Can the Department provide more support and information to accreditors to help them do their jobs more effectively and if so, what form should that take?

Has the Department or NACIQI become too prescriptive with regard to student achievement despite the statutory prohibitions on bright line standards and recognizing that accreditors are permitted to establish different standards for different institutions?

Are there better or other options we should explore? Is it appropriate for the Department or NACIQI to ask, encourage or otherwise require agencies to do things not required by the regulations? We appreciate the work that NACIQI has done on the student achievement pilot at the request of the prior administration and we also appreciate the work that accreditors have done to

1 develop new approaches to collecting and evaluating data.

2 In our own work the Office of Postsecondary

3 Education is seeking new methods to more accurately account for

4 the many confounding variables that impact student outcomes and

5 to more carefully differentiate between correlation and causality in

6 assessing educational quality.

7 Reviewing accreditors is a serious responsibility.

8 At all times we must be sure that we are considering the needs of

9 students and honoring the diversity of institutional mission in our

10 reviews.

11 Accreditors, Department staff and NACIQI come to

12 this table as equals and the focus of the discussion should remain

13 on the Department's written regulations and the evidence that all

14 three entities have had sufficient time to review and advance.

15 We appreciate the time, the energy and the

16 incredible dedication that the accreditation staff and that the

17 NACIQI members bring to their work and we appreciate as well

18 that so many members of the public are here to participate in the

19 process as well.

20 I will end my remarks by confirming that we have

21 placed accreditation on the unified agenda of regulatory and de-

22 regulatory actions and we did this so that in the event that

regulatory changes are necessary, we can move forward swiftly and without delay to move forward on those changes.

We will provide more information about rule-making as those details become available. Mostly I want to thank the accreditation staff, the NACIQI and the accreditors for the time, the attention and the dedication that they all bring to this very important work and thank you for this opportunity to address the community.

CHAIRMAN KEISER: Thank you Diane, we'll see you again soon.

MS. AUER JONES: Yep.

RENEWAL OF RECOGNITION

LIASON COMMITTEE ON MEDICAL EDUCATION

(LCME)

CHAIRMAN KEISER: Back to my Agenda. Okay we are now -- it is a few minutes behind. We're now looking at the Renewal of Recognition for the Liaison Committee on Medical Education. My Primary Readers are Steven Van Ausdle and Susan Phillips.

If someone would like to make the introduction, Susan?

MS. PHILLIPS: Absolutely, the Liaison

Committee on Medical Education (LCME).

CHAIRMAN KEISER: Susan one second, the recusals -- I'm sorry, anybody need to recuse themselves? Okay, I'm sorry to interrupt, you can start over again thank you.

MS. PHILLIPS: That's alright. The Liaison Committee on Medical Education (LCME) accredits medical education programs leading to the MD Degree. Currently it accredits 125 MD education programs in the United States and the Commonwealth of Puerto Rico which are operated by universities or medical schools that are chartered in the United States.

The LCME is a programmatic accreditor and therefore does not have to meet the separate and independent requirements as set forth in the Secretary's criteria. Accreditation by LCME is a required element in enabling its programs to establish eligibility to participate in federal non-HEA programs.

Programs administered such as programs administered by the Department of Health and Human Services require that medical education programs be accredited by LCME and that LCME be recognized by the Secretary of Education in order to participate in a variety of programs such as the scholarship and loan repayment programs and health professions and student loan program.

1 The Agency programs also use its accreditation to
2 receive Title VII funding administered by the Public Health
3 Service. That's the reason why they're before us to end their
4 federal link. They are -- have been recognized since their last
5 appearance and I turn it back over to the staff.
6 CHAIRMAN KEISER: Thank you Susan. Chuck
7 Mula is our Agency staff member, your report?
8 MR. MULA: Good afternoon Mr. Chair, members
9 of the Committee. For the record my name is Chuck Mula and I
10 will be presenting a brief summary of the Petition for Continued
11 Recognition by the Liaison Committee on Medical Education
12 hereinafter referred to as LCME.
13 As part of the evaluation of LCME's petition the
14 Department staff reviewed the Agency narrative and supporting
15 documentation. There are no third-party comments in connection
16 with the petition and no active complaints that's been received by
17 the Department.
18 The Department's review of LCME's petition found
19 that it is in compliance with the Secretary's criteria for recognition.
20 The Department has no concerns and is recommended by the
21 senior Department official to review LCME's recognition for a
22 period of 5 years, this concludes my report. There are members of

the Committee here and we will be happy to answer any questions you have.

CHAIRMAN KEISER: Thank you Chuck. Would members here from the Agency please come forward and introduce yourselves and begin your presentation? Welcome.

MS. WOODWARD: Thank you, good afternoon. I'm LouAnn Woodward. I'm the Vice Chancellor and Dean of the School of Medicine at the University of Mississippi Medical Center. I'm currently serving as the Chair of the LCME and I'd like to ask my other representatives to please introduce themselves.

MR. MITCHELL: Hi, I'm Ray Mitchell. I'm the Dean for Medical Education at Georgetown University. I've been a member of the LCME Committee for about 5 years. I've probably done another 10 years of those visits and I'm the Chair-elect for LCME.

MS. CATANESE: Good afternoon, I'm Veronica Catanese. I'm the LCME Co-Secretary based at the AAMC here in Washington.

MS. BARZANSKY: Good afternoon, I'm Barbara Barzansky. I'm the LCME Co-Secretary based at the American Medical Association in Chicago.

MS. WOODWARD: I'll make a few remarks and

1 then we'll all be available for questions. I want to thank you
2 Chairman Keiser and members of the Committee. I'd like to thank
3 Dr. Van Ausdle and Dr. Phillips for serving as the Primary Readers
4 and Chuck Mula for the review and recommendation.
5 We are here to represent the Liaison Committee on
6 Medical Education as you heard earlier, commonly called the
7 LCME. This is the body that accredits allopathic medical schools,
8 medical education programs. We have two sponsoring
9 organizations.
10 One of those is the American Medical Association
11 headquartered in Chicago and the other is the Association of
12 Medical Colleges or American Medical Colleges commonly called
13 the AAMC and that's headquartered in Washington, D.C.
14 The Committee itself is made up of 19 members.
15 There are 15 professional members, there are 2 public members
16 and 2 student members. Of the 15 professional members, they are
17 all similar to myself or Dr. Mitchell.
18 They are Deans at medical schools, are leaders in
19 medical education at medical schools. They are experienced
20 professionals, they are also experienced site visitors. And I will
21 tell you that it's a group of people that are very much committed to
22 medical education and the betterment of medical education in this

country.

We are also supported by a fantastic staff. Our meetings typically last several days and there is quite a bit of thoughtful and careful deliberation as the decisions are made. Currently there are 151 LCME accredited medical education programs.

Of these, 14 are new programs that have been first accredited since the LCME was reviewed by this body in 2012. Typically the LCME full survey cycles are 8 years and we do about 15 to 20 full surveys in any given academic year.

Of the 67 full surveys that were conducted in the past 4 academic years, 28% of those had what the LCME defines as a severe action which would be an indeterminate term meaning the program was not awarded the full 8 year term, a warning or probation.

No program has had its accreditation withdrawn. The LCME collects data on those areas that are most commonly sited and conveys this information to the medical schools. For the most recent years these areas include standards related to curriculum evaluation and management, the learning environment, continuous quality improvement processes, assessment of the student's clinical skills and student debt and debt management

1 counseling.

2 A previous study showed that non-compliance with

3 curriculum management is statistically related to a severe action.

4 When you look at data that we routinely gather from schools, there

5 are three questionnaires that are sent annually to the schools.

6 These cover medical school finances, student

7 financial aid and debt and curriculum and student assessment.

8 Each year 8 academic years of selected data from these

9 questionnaires that relate to accreditation standards are compiled

10 into a table for each medical school.

11 This trend data is also reviewed by LCME staff to

12 identify changes that exceed LCME pre-defined levels such as a

13 10% change in the size of an entering class within one year,

14 changes in the number of faculty and changes in the balance

15 among revenue sources for the schools.

16 Schools with such changes are contacted by LCME

17 staff to obtain an explanation to determine if the trend presents a

18 concern related to the quality of the medical education program.

19 There are specific actions taken for programs that

20 are awarded a severe action and as I mentioned earlier that would

21 be an indeterminate term -- warning or probation. The LCME may

22 vote to take a severe action based on the full survey or after a

follow-up report submitted by a program following a full survey.

Programs with severe actions must develop and submit an action plan using a standardized template within 9 months. The plan includes the steps that have been and will be taken to address each cited area, the individuals responsible and a time line for completion of the steps.

Before the action plan is due to the LCME, there is a consultation visit to the school by members of the LCME Secretariat to provide feedback on whether the proposed plan is likely to address the problems in a timely manner based on the intent of the standards.

After the LCME reviews and approves the action plan, a limited survey visit is scheduled to address all cited areas. Since this process was started about 5 years ago, all schools with a severe action have reverted to a regular 8-year cycle following the limited survey and status report.

This means that the areas of non-compliance have been corrected. For MD program students the LCME evaluates success related to student achievement most directly using graduation rates. The performance in the USMLE examination which is the licensure examination and acceptance to a graduate medical education program commonly called a residency.

1 These were chosen because a physician cannot
2 obtain a license to practice without passing the USMLE
3 examination and spending a defined number of years in residency
4 training and there are national comparison data for each of these
5 three measures.
6 Some of the achievement challenges that we see
7 there's increasing competition across the spectrum for graduate
8 medical education positions. The number of students in both MD
9 and DO granting programs continues to increase. This is increased
10 pressure on the medical students to perform well on the USMLE.
11 In general, the ultimate national graduation rates are
12 over 95% though some students may take longer than the typical 4
13 years for a variety of reasons. In general, the LCME expects that
14 there is appropriate academic counseling at the schools to assist
15 students who may need support.
16 It is likely that the LCME will continue to use these
17 three indicators of student achievement. The standards also require
18 that schools collect data from residency programs on how well
19 their graduates were prepared for residency and on licensure data.
20 A program would be cited and require monitoring if
21 programmatic performance on the three indicators is below the
22 national benchmarks. Thank you for allowing me to make this

presentation and we look forward to your questions.

CHAIRMAN KEISER: Do the Primary Readers have any questions, Steven?

MR. VAN AUSDLE: Well let me say I think every question I've had you answered so congratulations. I want to compliment you on your website. I went into that website and said okay I found a student and I want to go to medical school, can I find the information that would help me make an intelligent decision.

And that information is there. I also wanted to decide whether you were really identifying the institutions that needed support from your group and you could see that. I think there was one institution on probation, a couple provisional and you've discussed that again.

I commend you on the outcomes orientation of your profession. You're driven by objectives, identified outcomes and competencies at every step. I was going to ask you the question -- I couldn't find the completion rates, what's the odds of me getting through medical school. It looked like you said 95%.

MS. WOODWARD: That's correct.

MR. VAN AUSDLE: But I assume there's some that drop out along the way that kind of don't make that right?

MS. WOODWARD: That's correct, yes.

MR. VAN AUSDLE: You've explained to us how you've used information and how you work with institutions that have deficiencies. Has that been pretty successful -- I think that's what I heard?

MS. WOODWARD: Yes, I would say that it has been successful and I can say that from both the standpoint of serving as a Committee member, now I'm about to start my 6th year of service. Dr. Mitchell and I are actually on the same cycle so we've been on this Committee for 5 years but also from the perspective of the school so I think Dr. Barzansky wanted to add to that.

MS. BARZANSKY: Over the years we've increased support for both survey teams and schools and so there are at least 9 monthly webinars for schools where there is a survey in the next few years where faculty -- usually about 200 will ask questions about what standards mean, what should we do, you know, and it's not only the individual who benefits it's everyone who's listening in.

There are also annual orientation sessions for schools that are upcoming for survey visits. There are opportunities for the Secretariat, Ronnie and me and my colleagues

to go to schools and do a kick-off when they're starting their self-study. So we try to get to schools in as many ways as we can so the Secretariat really keeps an arm's length from the LCME in terms of what schools tell us and so they feel free to share their problems and we feel that we can help them without guaranteeing that's what the LCME will do, but we do our best.

MR. VAN AUSDLE: So you have explained one student outcome and we're interested in how you measure outcomes and impacts of your programs. Could you also share since the data is not available in IPEDS, what your loan default rates might be or students who with other challenges -- what are some of the other outcomes that you measure in addition to graduation rate?

MS. BARZANSKY: Okay, well since we're not an institutional accreditor we're not a Title IV gatekeeper.

MR. VAN AUSDLE: Right.

MS. BARZANSKY: And so we don't do loan default rates.

MR. VAN AUSDLE: Alright.

MS. BARZANSKY: We do have a lot of information from students and so every year the Association of American Medical Colleges puts out a questionnaire to graduating

medical students and usually about 14 - 15,000 respond and it asks -- did you get prepared well in your curriculum? Did the faculty treat you appropriately? Did you have access to administrators?

A whole lot of things about student life that we look at very carefully because they do tie very closely back to our standards, anybody else want to?

MR. MITCHELL: I would just add that it is what most of us who are also Deans lose sleep over is that it's an expensive education.

MR. VAN AUSDLE: Yes.

MR. MITCHELL: I think the national average for -- is about 180 -- if you're a private school it's a little higher, about 200 so we do look at and when you visit a school you look at things the standard would really ask what steps have you taken to mitigate the impact.

And for us you don't want a young man or woman to leave real goals of conscious on the table because they can't afford them -- so it's a challenge and I think we're all as an institution, as an accrediting body, we look at I think try to look realistically at what is the school doing to help those individuals.

MS. WOODWARD: So if I could clarify just a point. The 180 -- 180,000 and the 200,000 that he mentioned is at

the time of graduation total student debt. The average numbers -- not the tuition numbers.

MR. MITCHELL: No, no it's the total education.

MS. CATANESE: I also would add something that really connects what Barbara said with what Ray just said and that is that these very common challenges that schools face -- student debt, debt management, some issues related to the learning environment for students.

One of the things that is so valuable about those 9 months a year webinars that Barbara mentioned is that the Secretariat plans and facilitates those but there's also peer presentation and peer sharing of ways in which individual institutions have met those challenges as well.

And that's another thing that happens when Barbara and I do consultations -- we'll look together with the schools and their teams through their challenging areas and work with them to develop a plan to move forward that's based upon, you know, a fair amount of experience with what other institutions are doing that have been successful or have actually been challenged and then been successful in that area.

MS. WOODWARD: Might I add another comment?

MR. VAN AUSDLE: Sure.

MS. WOODWARD: Twice a year this organization that we've mentioned the AAMC has a large annual meeting once a year and then in the fall and in the spring has a meeting of the Council of Deans and at those two meetings members of LCME's Secretariat and then other members of the Committee such as myself participate in sort of a town hall type session.

So that if you are a Dean or a medical education leader, that for whatever reason didn't make it in the webinars or has not had any other consultations or haven't had any other platform available, it's basically an open session where people can bring forward questions and concerns and receive information.

MR. VAN AUSDLE: I have two short questions and one could be almost yes or no, the other one I find it really intriguing how you involved students in the re-accreditation process. I'd like you to highlight that because I think it's a practice that we need to know.

And then my final question is if I go into medical school, is there a demand for an additional trained physician out there at the present time and will I get a good return on my investment from that 180?

MR. MITCHELL: The nice thing about our

organization is it truly is like probably others you all review, but it is a volunteer driven organization. We all have the same -- so when you sit down and do a visit you can say to the school we've been through this on both sides.

The students also are part of that so every visit includes an independent student analysis and surveys. Site visitors in many ways will go to document the fact that the standards that they have presented match up with what you find on the ground, but importantly it matches what the students tell you when you're there.

So for us the visit really is just as important to spend time with the pre-clinical students, the third year students and the fourth year students. And often it's very re-affirming that they're good students who are getting the support they need.

And our students -- two student members are critical and as we -- when you watch the room and you watch people really deliberate and sometimes agonize over those decisions a student that speaks up and said what I see in the database is a deficit in support for students -- it's a compelling message.

So I think including the students at the table but also the survey and then the site visitors seek out the students.

MS. WOODWARD: And the students on the Committee participate in site visits as well, not just in the Committee meetings but also participate on site visits. To speak to the question about is there a need for our product -- the students that we are graduating from schools -- there are a lot of studies out there right now on physician work forces and the numbers are kind of all over the place.

But easily you can find predictions that in the next 10 years they'll be somewhere between 30,000 and 100,000 too few physicians in this country. It depends on whether or not you're looking at primary care or certain specialties and whatnot, but no matter which report you believe they all say there is a huge physician workforce shortage.

So we are very confident that our graduates will in fact have very good career options in front of them no matter what specialty they are considering and no matter where they want to go in the country.

MR. MITCHELL: There's job security.

MR. VAN AUSDLE: And I'll be able to pay-off that loan you're talking about?

MS. WOODWARD: That's right, that's right.

MR. VAN AUSDLE: Thank you Mr. Chairman.

MR. JONES: I'd like to follow-up on that last point. Many of those studies also point to the fact that where the demand is most surely felt is in rural communities, low income and under-represented communities.

And so while I understand they're not an institutional accreditor, a gatekeeper of that sort, I'm curious how you all think about your role and execute your role as abiding to encourage more program growth, you know, I guess one way you address that demand is new medical programs in schools, more residency programs and then of course, we see lots of American students are going to foreign medical schools.

But I do think that seeing more high-quality programs that are focused on addressing those under-represented areas would be the way to go and I'm curious how you see your role?

MS. WOODWARD: So I'll give my answer and then turn to my colleagues. Every medical school has a different mission. So some medical schools are very research oriented, some medical schools are very much mission driven to provide care for the citizens in their state, et cetera.

So just as an example I'm from Mississippi. We are one of those schools that were actually last in the ranking by the

states in physicians per capita. So as you might imagine, a big driver for us is to keep physicians in our state. We are a rural and an underserved state.

So one of the areas where as a school we have worked to address this is we have worked with our state legislators to establish scholarships for students for school that might not otherwise be able to afford it who then commit to stay in the state.

So we have some state-sponsored scholarships with private sponsor scholarships. At a Committee level the amount of attention that we pay to student overall debt also then drives the schools that might not have that as a top-level mission but it drives all of the schools to look at how they control debt and that is typically through scholarships or some sort of commitment for service payback program.

MR. MITCHELL: And I would say that even within our standards there really is a lot of attention to -- within the guidelines of a holistic fair and legal admission process but real attention to diversity.

And as Dr. Woodward mentioned, each school defines what they are but they may be first generation students, they may be people from the inner city, they may be people from urban areas who are likely to go back. Debt does play a role but

there's also even within content -- every school is required to have opportunity for service learning.

So if it's like my institution that's at the old DC General running the healthcare clinic at the old family shelter, every school at least has to have an opportunity for every student to go, I think where their heart should be.

It's not that they're required but they have to have the opportunity to be fair and to push the opportunity for diversity in every school.

MR. JONES: That's helpful, thank you.

MR. WOLFF: Thank you, very helpful. I'm very interested more as well in the student participation and very much appreciative of the fact that you are leading in that area. I wish more accreditors did that.

Could you describe for your student Commissioners how they're selected, do they serve the same terms as you all do? How are they trained? The argument I raised at one point and was shot down instantly for a regional accreditor and I think it should/needs to be done.

But the issue I was always told well they're going to graduate, they're going to finish and they're not going to pay attention. So if you could say a little bit more about as the

Commissioner and their level of participation, thank you.

MS. WOODWARD: So I'll touch on that briefly and then ask others to fill in the gaps. As I mentioned with the two sponsoring organizations, the AMA and the AAMC, each of those organizations identifies a student and they do that by sending out sort of the call to the different medical schools.

So once those students are identified in their third year -- so as rising fourth year students, they spent a year with us while they are seniors. Our term is 3 years with the option for one renewal so the possibility of a total of 6 -- but the students have a one year term.

The students like all new members, attend a meeting in June before their July term officially starts so that they have the opportunity to observe and to kind of have the hand-off from the students that are leaving to have -- we always have an orientation session in June.

And I'll ask Dr. Barzansky to speak more to the student sort of orientation and training but throughout the course of the year the students are full voting members, they go on site visits, they participate in all the conversations and as was mentioned earlier we are very deliberate, particularly if the topic being discussed is related to some part of the student experience or the

student environment. We are very deliberate to ask for their input specifically if they are not you know, raising their hand to make their point.

Most of the professional public and student members on the LCME are not shy about expressing their opinion but if in fact they have not spoken up we will deliberately seek their input.

MS. BARZANSKY: And as was said as they're about to start they're mentored by the previous students but they also receive an LCME member as a mentor so when they're doing their reviews they might be given a secondary role in reviewing a survey report or a written status report.

The second meeting they sell low. You know they still have that backup but they get to do the review and the staff and their mentor is available to them. And by the time they're ready to leave they're quite sophisticated.

You know most of these students have had educational roles in their own medical school. They've been on the Curriculum Committee, they may have worked with the school to prepare it for an accreditation review -- so that's the thing that's looked for.

So you get students who have a good grounding so

they're really ready to start.

MS. CATANESE: And just one more piece is at right before the June meeting at which the students come before they actually start their year of service there is a formal orientation not only for them but for all new members of the LCME which really not only speaks about the process of review and the process of deliberation, but also about the confidentiality.

So they are very much oriented to the total functions of the group because they really do function in every capacity as a full member of the LCME.

MR. MITCHELL: I would just add that as pointed out these are students who have had an educational background and they probably have a little residence in their heart that they're going to be educators.

This year in June we will celebrate one of our departing LCME faculty members from North Carolina who was a student appointed to the LCME just a few years ago as a student, now he's finishing his term on the LCME as a faculty member.

MR. WOLFF: And do they serve while they're doing their third year or fourth year they're doing rotations right? So they do that in addition to their clinical rotation, that's excellent, thank you.

CHAIRMAN KEISER: Kathleen, Frank and then Simon.

MS. ALIOTO: I'd like to thank you for your impressive and insightful presentation to us and I'd like to ask in terms of your curriculum assistance to the various institutions you're helping to serve, are any of the curriculum dealing with our national crisis of the opioid crisis and if so, what are you doing to assist with that?

MS. BARZANSKY: Well there's two ways to answer that. The basic is part of our annual questionnaire to medical schools is asking where do you teach it, how do you teach it, you know what year of the curriculum is it in so that we get good baseline data so when a school is up for a survey, substance abuse in general is one of our things that the survey team looks for.

So we've got good background data specifically related to preparing students to deal with the opioid crisis.

MR. MITCHELL: I would say that we're like a lot of accrediting bodies, we're not prescriptive about how to solve it but they do need and we do look to see where are you dealing with societal problems including rising -- and what will often happen is on a visit or on a review of a school we'll really find best of class practices that come out in these visits that honestly people around

the table appropriately and confidentially carry them away and adopt them and so I think in the long-run though not prescriptive, it has to be in there.

MS. ALIOTO: Thank you.

MS. CATSANESE: I would just add something from the other side and from the side of what we expect schools to do for our students. There is a from a student service perspective there's a very strong expectation that there be programs in place for student well-being and this is one of the -- that they have the appropriate access to any kind of personal counseling that they may need and this is really looked at very, very closely by the survey teams and by the LCME.

MR. WU: I might just be mistaken but I thought there were still some stand-alone medical schools. Are there not any anymore? Oh, okay, I was just going to ask who is the Title IV gatekeeper but every institution you accredit is also accredited by regional or somebody else?

MS. BARZANSKY: Right, that's one of our eligibility requirements.

MR. WU: Oh I see.

MS. BARZANSKY: They must obtain and keep institutional accreditation.

MR. WU: So there aren't any more in the U.S. stand-alone medical schools?

MS. BARZANSKY: Well it depends on what you mean. I mean there are institutions that are a medical school or perhaps a medical school with one other school. They're not tied to a university.

MR. WU: Right.

MS. BARZANSKY: But they are regionally accredited.

CHAIRMAN KEISER: Simon?

MR. BOEHME: Well, wow, today has just been really a good day because two accreditors have come before us saying that they have students involved and wow, I just want to acknowledge that so thank you because you're not only talking about students but through your words you're putting it into action and being leaders in that.

And you know, as we heard from the Under Secretary today while the current administration is thinking about asking these questions, again with peer review, one of the best things about accreditation is asking questions and it seems like having stakeholders from all different parts will help to answer some of these questions that were posed today. So thank you.

CHAIRMAN KEISER: No further questions? Thank you very much for joining us, very interesting presentation, Chuck?

MR. MULA: Staff has no additional comments Mr. Chair.

CHAIRMAN KEISER: Do the Primary Readers entertain a motion from the Primary Readers, Steve -- Mike, turn your mic -- not Steve, Mike.

MR. VAN AUSDLE: Thank you. I thought you could hear me anyway.

CHAIRMAN KEISER: Well we can but --

MR. VAN AUSDLE: Okay I'm going to start over and go slower for you too okay.

CHAIRMAN KEISER: Go as fast as you want.

MR. VAN AUSDLE: I move that NACIQI recommend that the Liaison Committee on Medical Education Recognition be renewed for 5 years.

CHAIRMAN KEISER: Is there a second?

MS. PHILLIPS: Second.

CHAIRMAN KEISER: Second by Susan Phillips. Now there's discussion by the members -- sensing no discussion all in favor of the motion signify by raising your hand. All those

opposed -- motion carries, thank you very much, LCME.

NACIQI RECOMMENDTION

To renew the Agency's Renewal of Recognition for 5 years.

COMPLIANCE REPORT

AMERICAN BAR ASSOCIATION

COUNCIL OF THE SECTION OF LEGAL

EDUCATION AND ADMISSIONS TO THE BAR

CHAIRMAN KEISER: We are moving to the next presentation which is a Compliance Report from the American Bar Association Council of the Section of Legal Education and Admissions to the Bar.

The Primary Readers are Simon Boehme and Roberta Derlin, are there recusals? Is John recusing or not? He is and Claude is recusing? Okay, let's just wait a second and I'm sorry I moved so quickly. Frank's not coming back, wow, taking a vacation. What do I do without my Vice Chair? 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 -- oh we have a quorum.

(Side talk).

So we are all set. Welcome back sorry for the delay. Bobbie I think you are ready to make the presentation?

MS. DERLIN: The American Bar Association's Council of the Section of Legal Education and Admissions to the

Bar was initially recognized by the Department as a Title IV gatekeeper in 1952 and has been continuously recognized since that time.

The Council is both an institutional and a programmatic accrediting agency. The Council currently accredits 199 legal education programs, 19 of these are free-standing law schools and maintain independent status as institutions of higher education with no affiliation with the college or university.

The Agency was last reviewed for continued recognition at the June 16 NACIQI meeting when the state Department official issued a decision that required the Agency to come into compliance with several areas of the Secretary's criteria within 12 months and submit a compliance report 30 days thereafter.

The Agency's compliance report is the subject of this analysis today, the end.

CHAIRMAN KEISER: Thank you Bobbie. The staff is George Smith, George?

MR. SMITH: Good afternoon Mr. Chairman and members of the Committee. For the record I am George Alan Smith and I'm presenting a brief summary of the American Bar Association's response to its compliance report.

Department staff reviewed the American Bar Association's compliance report response and its supporting documentation. The Agency's areas of non-compliance were under two broad categories -- organizational and administrative requirements and required standards and their application.

More specifically the criteria of non-compliance were a staffing financial resources, competency of representatives, academic administrative representatives, program length and self-study.

We received a written third-party comment which included concerns regarding redactions in resumes and biographical information, a specific Agency staff member and whether distance education was within ABA's scope of recognition.

Although the comment acknowledged the Agency's efforts with its self-study revisions it also emphasized -- it is not clear that the ABA has demonstrated sufficiently aggressive implementation of the standard and that it remains to be seen whether ABA's revised self-study policies are sufficiently aggressive to combat non-compliant practices at problematic law schools.

The commenter also asserted that the Agency's

1 recent actions on finding 23 programs non-compliant are
2 promising signals for improved focus on compliance but suggests
3 that the Agency ignored early warning signals from these
4 institutions including their low bar passage rates, high volume of
5 student complaints, and high debt to earnings ratios.
6 Given that the ABA has provided sufficient
7 evidence to become compliant in the 5 aforementioned criteria, the
8 staff recommendation to the senior Department official is to accept
9 the Agency's report and renew its recognition for a period of 3
10 years, this concludes my report, thank you.
11 CHAIRMAN KEISER: Are there questions for the
12 Primary Readers? No questions, questions from the members of
13 the Committee? Would the Agency representatives please come
14 forward if they're here? Please introduce yourselves and welcome
15 to the NACIQI.
16 MS. O'ROURKE: Thank you, good afternoon and
17 thank you for giving us the opportunity to appear. My name is
18 Maureen O'Rourke and for the past 12 years I have been Dean at
19 Boston University School of Law and I was Interim Dean for two
20 years before that.
21 I'm honored to be here today in my capacity as
22 Chair of the ABA's Council of the Section of Legal Education and

1 Admissions to the Bar. I am here with on my immediate right
2 Managing Director Barry Currier, to his right Accreditation
3 Counsel Stephanie Giggetts and to her right, Deputy Managing
4 Director Bill Adams.
5 As an initial matter I'd like to thank the Department
6 and specifically George Alan Smith and Herman Bounds for their
7 work. We really appreciate your thorough review of our
8 compliance report and your advice and guidance. Thank you also
9 to our Primary Readers, Mr. Boehme and Dr. Derlin for their
10 efforts as well.
11 As Dr. Derlin noted we were last before you in
12 June, 2016 when then Council Chair, Chief Justice of the Arizona
13 Supreme Court Rebecca Birch, appeared with Mr. Currier, Mr.
14 Adams and Miss Giggetts.
15 Following that meeting the senior Department
16 official issued a decision generally finding compliance with the
17 recognition criteria but requiring a report back on several issues.
18 We filed our report on October 20, 2017. As you know the staff
19 report finds compliance with all of the criteria cited by the
20 Secretary.
21 The draft staff analysis did identify one outstanding
22 issue from our compliance report which we have now addressed

and the final staff report recommends the continuation of our approval.

I know that last time we appeared you had a number of questions -- we thought rather than going back and revisiting each one we would see what most interested you today and we're happy to take any of your questions and again thank you for the opportunity to appear.

CHAIRMAN KEISER: Are there questions, Simon?

MR. BOEHME: Great, well thank you so much for coming to come before us. I wanted to have a conversation and I know you guys were on the consent agenda so I appreciate you coming but you can blame me.

You guys came before us June 22nd of 2016 which I think you guys were pretty lucky to come at that time because it was during ACICS so everyone only came for ACICS and they unfortunately missed our conversation about ABA and I was looking through the transcript and I said you guys were lucky that ACICS was there because I think there's a lot of work that the ABA should be doing, maybe this is telling me that I shouldn't keep going.

But sorry -- no that's okay, and so but I have to

admit it sounds like you guys really kind of took our conversation to heart since coming to NACIQI and maybe it was a great awakening but it seems as though you guys have become a little bit more aggressive in enforcing your standards and it's my understanding you've also done some updating in your standards, maybe in so far as you've been put 10 law schools on probation or warning.

And so if you can clarify with that and you have been sued by 3 schools -- Western Michigan, Cooley, a school in Florida and another one which I'm sure you guys will keep us up to date. But there was this serious discussion with NACIQI and you guys when you guys when you guys came here two years ago about your standards and the rigor and obviously some of it came from a public policy perspective.

But I think it's important that you let us know what you've been doing in the past two years to kind of not be asleep at the steering wheel and it seems like you guys have been quite proactive.

MS. O'ROURKE: Sure, so one thing that I do want to mention is we appreciated the input at our last hearing and at that time we did have several schools in the process but those matters were kept confidential and we couldn't talk about them so

there -- so matters were underway at the time we did appear and since that time we have placed 3 schools on probation, directed 6 schools to take specific remedial action and requested 9 schools to appear at a show cause hearing.

2 schools have closed and had their approval withdrawn, another school is in the process of closing and teaching out at students, an additional school opted not to enroll a first year class this coming fall and we have recently heard from another school that is closing and teaching out at a branch campus.

One other development I think that has proven very helpful is we received some guidance in November of ’16 from the Department with respect to how we administer what we call our Rule 12A-4 proceedings, what must be published.

And so before while we had kept everything so confidential now more goes up on our website on the home page and under news and reports. So that gives people earlier notice of what’s in process so it doesn’t -- so you know as well.

MR. BOEHME: So on the topic of transparency and without anyone commenting on things they can’t -- regarding these lawsuits. But it seems from reading media reports and feel free to clarify but some of it was around that rule which we did have a lengthy discussion about was the transparency around -- not

1 necessarily decision-making of the ABA but how these rules were
2 enforced, is that accurate?
3 MR. CURRIER: Yeah, I think that's true but I
4 think what we -- in the dark past yeah we had this two-step process
5 with the Committee and the Council and when the process was at
6 the front end the way we have our rules set up a school could be
7 asked for additional information. We could say we had a reason to
8 believe they were out of compliance or we could find the
9 Committee -- not the Council but the Committee could find them
10 out of compliance.
11 And we didn't publish that out of compliance
12 notice. We waited to publish until the Council had taken more
13 specific action in the nature of directing remedial action or
14 probation or something of that sort.
15 So the guidance the Department gave talking about
16 adverse actions led us to conclude that even though there was still
17 a long way to go before a school was really, you know, like it's
18 you're really out of compliance, at that point we had declared them
19 out of compliance with a standard and so we believed that the
20 guidance requires them to go ahead and publish that outcome at
21 that early stage.
22 So we are publishing earlier than we were. A

decision that was the start of a process and that's what was in process last time we were here and so yes, I'd agree with you. Let me also just clarify so we've been -- we are parties Defendant in lawsuits by WMU Cooley and then two law schools that are owned by a company -- Florida Coastal School of Law and Charlotte School of Law.

We've also been named as a party Defendant in a key tam action that was not joined in by the U.S. attorney and the Plaintiff in that action has refiled her complaint adding a student Plaintiff and naming the American Bar Association and the Council and the Accreditation Committee as Defendants.

So we are both a Defendant in an action by a law school and we are a co-Defendant with that same law school in an action by someone else.

MR. BOEHME: And this -- correct me if I'm wrong Mr. -- you've been with the ABA Managing Director of the Education for quite some time?

MR. CURRIER: Since 2012 and then way back at the beginning of the century I was there as the number 2 person in the office for a few years and I left.

MR. BOEHME: The ABA or the Council has not been sued that many times. This is the first time in quite some

time -- I mean I'm sure you guys are lawyers so by nature. But I'm never going to get into law school because I harass you guys all the time, but --

MR. CURRIER: Actually that may get you a scholarship.

MR. BOEHME: You're going to write my letter. But so in all seriousness though I think there is this serious conversation again we heard comments from the senior Department official about looking at new ways and things and would it be fair to characterize that you guys have the ABA -- Council has gotten a little bit more aggressive and I know you said the Dark Ages -- I don't know when you would pinpoint that but what do you generally characterize that as what strides you had maybe felt empowered or you feel through being more transparent that your members now understand what their expectations are and that may be in those Dark Ages or in the past maybe things could have got in the way but now you're much -- would that be a fair characterization?

MS. O'ROURKE: I don't know that I would phrase it as more aggressive as much as I would say we are responding to a dramatic shift in the market that really forces the issue for a number of our schools -- so that I think would be the way that I

would put it.

And there are some -- because of the dramatic shift in the market and so many other shifts including technology and just the way that change occurs so much more quickly now, one thing I should mention because you asked Mr. Boehme about things that we are doing differently.

One thing that we want to do in part to cut down the amount of time it takes to get through all of our processes is collapse what our current structure of accreditation committee, standards review committee then coming up into the Council into one body.

So bring the accreditation function and standards review function into the Council itself so there's only one body to go to and there aren't these many months' delays during which you're getting your process of an appeal.

MR. BOEHME: Okay, thank you.

MS. DERLIN: I'd like to speak to a different broad issue. You included in your submission what is now the self-study -- the two-part self-study for two schools -- U C Davis and Louisville. And in examining those materials I -- there's a particular section that talks about employment and there's also information about students repaying their debt, so on and so forth.

And the information that appeared for those two schools was quite positive. Graduates got good jobs, most of them as lawyers, often times in other professional positions and they were able to manage their debt repayment.

This is sort of contrary to some rather broad public communication about the fact that law school isn't necessarily the good deal it used to be because students struggle to find jobs and repay their debt. So my question is not so much about the rightness or wrongness of the perception, but what mechanisms do you have to keep in touch with students, practitioners and employers to inform that environment about pursuing a law career?

MS. O'ROURKE: It's a great question and I would say a few things. First I would say primarily our approach has been one of disclosure. So with respect to employment you'll see that our form that all schools are required to publish is quite detailed and so it breaks out by full-time, part-time, long-term, short-term, bar pass required, JD required, school funded, you know many different levels and so that helps students see and every school's required to publish it so they're able to see what the prospects look like at this institution.

It does not have though, salary range on it. That is not data that we collect at this point. With respect to the debt

1 question, that's a complicated question. It is our sense and I'll
2 come back to the sense -- that there is great disparity across the
3 range of law schools, great disparity across almost every metric
4 from employment to debt.
5 And one of the things that we have seen particularly
6 since the market downturn is that schools are spending more of
7 their financial aid dollars on merit than they are on need. That is at
8 least our sense. So you have potentially the ironic situation of the
9 people least needing the financial aid in some ways being the ones
10 to get it and at the lower end of the spectrum getting less aid and it
11 ripples through with less probability of passing the bar and
12 obtaining you know, employment.
13 With respect to data on debt, what we do now is
14 every school in what we call the Standard 509 report, the basic
15 consumer disclosures must post on their website and what they
16 post on this particular issue are the number of students percentage
17 receiving grants and then the grants are disaggregated into broad
18 categories like less than half tuition, half tuition, more, you know,
19 are more than full tuition.
20 And so you get a sense from that. It does inform
21 the marketplace a bit about well what's a reasonable thing for me
22 to ask for from this school in terms of a financial aid award. It

1 does not have on it what the average debt of a graduate is. So you
2 could kind of figure it out.
3 The second piece of the answer though is we live in
4 an interesting ecosystem in legal education so we have the Council
5 and the Council has what we call our group of affiliate
6 organizations. Included among those affiliate organizations are the
7 National Association of Law Placement Professions, NOW and
8 they do a tremendous amount of data gathering and publication of
9 where the jobs are.
10 And if you have more questions I'm happy to talk a
11 little bit more about what they do, so that's proven a great source
12 of information for students.
13 The second affiliate I think that's relevant to this
14 discussion now is Access Lex and I should mention that I'm on the
15 Board there. Access Lex was a lender of student loans primarily to
16 law students.
17 Then when the government really took over the
18 student lending Access Lex reinvented itself with the money from
19 the repayment of the loans into a research-granting body. And so
20 they provide services to financial aid professionals including
21 almost I think more than half of the law schools have signed up to
22 their new program which is online financial education and it starts

in your first year of law school and it's really intended to help -- there's sometimes a disconnect between what students think they can afford and what they're going to make on the backend and so that's intended to help try to address that problem so I hope that was in some ways responsive.

MR. CURRIER: Let me just say on the employment data -- so we have the 31,000 cell spread sheet that's available publicly to anybody who wants it that breaks down all of these categories by school, across the board. You can sort, you can study, you can do whatever you want.

But in the aggregate I think the news and sometimes I don't know why it's so with lawyers and law schools but the bad news tends to get highlighted. So the most recent report that we've published in the aggregate now for law students that graduated in 2017 and realized that most people have to wait until they get their bar results before they can get a job and that can vary from a month to 5 months.

But at the 10 month after graduation mark which is where we measure it, for the class of 2017, 69% of the students had a job that required bar passage within 10 months of graduation. So obviously that varies and some schools are in the 90's and other schools are significantly lower. As Maureen said we do this by

disclosure at this point but it is not the case that law students are -- in fact the numbers are going up, the percentages are going up because law schools have adjusted by reducing enrollment.

So law school enrollment is down about one-third since 2010. So jobs are bouncing back a little bit as the economy is bouncing back and 69% had jobs that required bar passage and another 12% had jobs where a JD was an advantage. So you put that together and that's over 80% I guess have meaningful employment within 10 months of graduation.

MS. DERLIN: Thank you.

MR. ADAMS: So I wanted to add something about the salary. Now that the Chair Maureen said about they collect salary information. Our science review committee data policy part discussed whether we should ask for that and the concern was one -- whether we'd get accurate data and two -- whether we could verify it.

We currently do an audit process where we're auditing what schools are reporting with regard to employment outcome so we can verify that a person is employed and a bar pass required job, long-term whatever. But the committee was concerned if we ask salary information we depend upon the graduates to tell us that. Many graduates would not want to tell

what their salary was and even if they gave us a figure we could not verify that -- so that's currently why the committee has decided not to try to publish information that might not be accurate.

MS. DERLIN: Thank you.

MS. NEAL: Welcome, the last time we met I opposed your renewal at that time as did many of us and in fact there was a large group voting to restrict your ability to do further accreditation, something that the Department of Education reversed upon their review.

I am now faced with your compliance report which I think it's fair to summarize looks at fairly ministerial issues about resumes and CV's and clarity of your self-study. And when I voted previously it was in light of substantive concerns about your standards, certainly looking at student debt, questions about whether your standards were actually tied to quality or for lack of a better term where more guild-like -- something that we've talked about with other entities this morning.

And I find myself challenged because I'm being asked to look at a compliance report when the fundamental issues which prompted me to vote previously have not been resolved because as I look the standards -- your standards continue to require a minimum of 83 credit hours that a JD program cannot be

completed earlier than 24 months, that students at any time cannot carry a course load that exceeds 20% of the credits required for graduation that restricts the types of courses institutions may accept for transfer credit and that still requires that full-time faculty shall teach substantially all the first one-third of each student's course work.

And we debated this actually the last time you were here. So I want to ask as I understand it you are easing restrictions on distance education -- has that happened?

MS. O'ROURKE: So thanks, Miss Neal. If you don't mind I'll give you an update on other standards as well. With respect to distance education yes we have going to the House of Delegates this August a more permissive distance education standard.

So Barry, you'll correct me if I'm wrong on distance education the proposal will be to permit up to a third of the credits required for graduation be able to be earned through distance education. Additionally the restriction on providing distance education in the first year would be lifted, correct?

MR. CURRIER: No.

MS. O'ROURKE: No.

MR. CURRIER: It would be limited to --

MS. O'ROURKE: Limited.

MR. CURRIER: 10 credits I believe, 10 credits, could be 10 of the one-third -- 10 credits of the one-third total could be in the first year.

MS. O'ROURKE: And so part of that -- the thinking behind that was we had granted some variances to allow schools to innovate with distance education based on their results which looked good. It seemed like it was time for us to do that.

With respect to other changes to the standards we're changing standards or we have proposed to change standards 501 and 503 which relate to admissions and the admission's test. So more specifically we would allow schools to take tests other than the LSAT more broadly than they do now, even to go without an admissions test although if they do so when their other indicators show us that they're quality of the student profile is at risk they will have to explain to us why they have departed from the LSAT or from taking a standardized test.

So I think those are the major changes to the standards that are, you know, have gone through the Council and are before the House coming up. And with respect to the compliance report we answered very specifically to the criteria that the Department had asked us to -- to reply to so.

MS. NEAL: Well I appreciate that. I always regret that these actions will occur after the vote and not before.

MR. BOUNDS: Yeah I just wanted to make a reminder that Department staff's review of the ABA was strictly limited to the compliance issues from their last full petition. So these additional areas were not part of -- part of our review.

And also I just wanted to point out too that as we all know the ABA currently does not have distance education within their scope of recognition. Again, they can add up to a certain percentage and we'll work with the Agency for that without having distance included in their scope, but at the present time to offer fully distance education programs would require them to come back in for an expansion of their scope.

MS. ALIOTO: Mr. French, what happened to the Century Foundation lawsuit in regards to the Department and the ABA?

MR. CURRIER: I can answer that because as I understand it the Century Foundation got an injunction that required the Department to give them access to certain data. I mean the Department can clear that up. I'd just comment on the reports we sent in were from two schools -- Davis and Louisville and we chose those deliberately not because they had good data

1 necessarily but because they're in states with pretty strong FOYA
2 laws and so we understood their data could be discovered in
3 general.
4 So that was why we chose those two particular
5 schools.
6 CHAIRMAN KEISER: Any other questions?
7 Thank you very much, Department Staff?
8 MR. SMITH: No additional comments.
9 CHAIRMAN KEISER: Can I entertain a motion
10 from the Primary Readers?
11 MR. BOEHME: My motion is going to be to
12 follow the staff recommendation which is -- I don't have that in
13 front of me. Yeah to extend for three years.
14 CHAIRMAN KEISER: A motion was made by
15 Simon, seconded by -- all in favor of the motion signify by raising
16 your hand, all those opposed -- motion carries.
17 **NACIQI RECOMMENDATION**
18 **To extend the Agency's Accreditation for 3 years.**
19 MR. CURRIER: Mr. Chair may I say one more
20 thing? I'd like to note for the record that we've had a student
21 member of the Council for more than 20 years and so --
22 MR. BOEHME: You should have put that in your

r\presentation thank you.

CHAIRMAN KEISER: If you had you would have been a good citizen. Okay our final -- you want to take a quick -- okay well I don't have a problem with that. We have time. I think we should take a quick break so that we'll come back in 10 minutes if you would be so kind.

(Break 3:07 p.m. - 3:22 p.m.)

CHAIRMAN KEISER: Okay could I have everybody's attention? One, two, three, four, five, six, seven, eight, nine, ten, eleven, twelve -- I've got plenty. Nicole are you ready -- Nicole, you ready -- okay, just to -- . I'd like to call the meeting back to order please.

Our final -- final action today is the renewal of recognition for the Accreditation Council on Optometric Education. The Primary Readers and John and Anne and whoever would like to start, Anne?

RENEWAL OF RECOGNITION

ACCREDITATION COUNCIL ON OPTOMETRIC EDUCATION (ACOE)

MS. NEAL: The American Optometric Education Accreditation Council on Optometric Education accredits professional optometric degree programs and optometric residency

programs. Sorry I'm having a little difficulty reading.

The Agency currently accredits 23 professional optometric degree programs and 213 optometric residency programs. In addition the Agency pre-accredits two optometric degree programs. These programs are all located throughout the United States and Puerto Rico.

ACOE's a programmatic accreditor and consequently is not required to meet the Secretary's separate and independent requirements. The programs use the Agency's accreditation to enable them to establish eligibility for federal programs under the Title VII Public Health Service Act and for participation in the Department of Veterans Affairs, Veterans Health Administration, education and training program for optometry residency programs.

CHAIRMAN KEISER: Thank you Anne, Dr. Harris?

MS. HARRIS: Good afternoon Mr. Chair and members of the Committee. For the record my name is Dr. Nicole S. Harris and I will be presenting information regarding the renewal petition submitted by the Accreditation Council on Optometric Education also referred to as ACOE or the Agency.

The staff recommendation to the senior Department

official is to renew the Agency's recognition for 5 years. The staff recommendation si based upon my review of the Agency's renewal petition, additional information requested and supporting documentation as well as observations of multiple program site visits conducted by the Agency in March and April of 2018 and an ACOE Council meeting in February, 2018.

During the current accreditation cycle the Department received no third party comments regarding the Agency's renewal petition and no complaints. Therefore, as I stated previously the staff recommendation to the senior Department official is to renew the Agency's recognition for 5 years.

There are Agency representatives present today and we will be happy to answer the Committee's questions. This concludes my report, thank you, yes?

CHAIRMAN KEISER: In the initial application there seemed to be 25-26 do not needs -- is there a reason for that?

MS. HARRIS: Yes the Agency did not include the attestation included in their sections. The approved attestation for areas that had not changed since their last review.

CHAIRMAN KEISER: Please introduce yourselves, I'm sorry Patricia -- have a seat and welcome.

MR. CAMPBELL: Thank you Mr. Chairman, good afternoon Chairman Keiser and members of the Committee. We appreciate the opportunity to appear before you today. My name is Bart Campbell. I'm the current Chair of the Accreditation Council of Optometric Education. I'm completing my 7th year as Chair and my 9th year as a member.

I have actively served the ACOE as a Committee member and an evaluation team member for over 20 years. My term with ACOE will end next month and I will be retiring from ACOE at that point, anticipation.

I'm also a professor and Vice President for Academic Affairs at Southern College of Optometry in Memphis, Tennessee. My colleagues will introduce themselves.

MS. URBECK: Good afternoon, I'm Joyce Urbeck, the Director of the ACOE and I'm based in St. Louis. I have been the Chief Staff Executive now for 32 years with ACOE and I don't have any imminent departure plans like Dr. Campbell but that's why we put him on the hot seat, so.

MS. NEUMANN: Good afternoon, my name is Laura Neumann. I'm a public member of the Council from Northern California. My background is in dentistry and dental education. In addition to academic positions I also served as

Senior Vice President for Education and Professional Affairs with the American Dental Association where I was responsible for accreditation testing services and educational policy.

MS. WIRTH: Good afternoon, I'm Tracy Wirth, the Assistant Director for ACOE also based in St. Louis, Missouri. I've been with ACOE for 18 years in my current position for 4 years, thank you.

MR. CAMPBELL: We welcome this opportunity to appear before this Committee today to represent the Council on the renewal of this important recognition for ACOE. As you heard the ACOE accredits professional optometric degree programs which are Doctoral level programs.

We also accredit optometric residency programs which are one year post-doctoral clinical programs. We previously were recognized by the Department for the accreditation of optometric technician programs with -- that included Associate Degrees.

However the number of those accredited technician programs has been declining and there are currently no Associate Degree programs that are accredited and consequently the Council requests the contraction in its scope of recommendation to remove technician programs.

We do want to state that we appreciate the observations of Dr. Harris. We thank her for her assistance during the follow-up in the petition process. We also appreciate the efforts of our Primary Readers.

We've prepared responses to the standard questions developed by NACIQI and I will be happy to present that information or if you prefer answer questions as posed by the Committee.

CHAIRMAN KEISER: It's your choice.

MR. CAMPBELL: I would like to cover our student achievements as I know that is a primary concern for the Committee. ACOE student achievements assessment standards for professional optometric degree programs are multi-faceted. ACOE has established core clinical competencies that all graduates of optometry programs must possess and these are specified in the Council's Standard Two which deals with curriculum for professional optometric degree programs.

They include numerous competencies including the need for the graduate to examine and treat the patient to arrive at an appropriate diagnosis, formulate a rational treatment plan and understand the various treatment and management options and provide preventative care, patient education and counseling.

1 These competencies and several others are used to
2 evaluate the program's curricular outcomes. Prior to July 1, 2017
3 the ACOE established the following trigger for additional review
4 of programs regarding national board scores. "The ACOE will
5 review a professional optometric degree program that has less than
6 a 70% pass rate for two consecutive years on the MBEO or any
7 professional optometric degree program that demonstrates a
8 decrease of 20 percentage points or more from the prior year's
9 ultimate passage rate."
10 This measure was evaluated through the ACOE's
11 annual reporting process and the Council would require programs
12 that did not meet the benchmark to prepare progress reports, in a
13 few cases we conducted interim evaluations of the programs to
14 assess the progress being made to address their passage rate.
15 Since the 2015 review of ACOE's compliance
16 report by the Department, the Council worked to develop a bright
17 line standard for student achievement for professional optometric
18 degree programs with input from the optometric practice and
19 educational communities that clearly establishes the ACOE's
20 expectations regarding student achievement.
21 New standards were developed and became
22 mandatory less than a year ago on July 1, 2017. Our new standard

1.3 states, “Within 6 years of initial matriculation at least 80% of entering students must be licensed to practice optometry or have passed all three parts of the MPEO examination or passed the equivalent Canadian registration examinations. Programs are also required to identify outcomes measures related to their own goals and objectives and use results of these assessments to improve their performance.”

For optometric residency programs the achievement standards include core competencies which must be included in the curriculum. Residency programs as I mentioned, are one year post graduate programs that are primarily clinical in nature but which also include a didactic and scholarly component.

The ACOE standards require that residency programs achieve at least a 70% completion rate within the last 8 years or ACOE will initiate a review of the program. The standards also require that programs must demonstrate that at least 70% of those completing the program within the last 8 years have worked in the clinical, education, research or administrative setting within two years of completion of the residency or ACOE will initiate a review of the program.

Residency programs are relatively small in size with a number of residents enrolled in programs ranging from 1 to 9

with two resident enrollees being the most common size. Residency completion is not required for licensure in optometry but completion of a residency program is required by many schools and colleges of optometry for faculty positions.

Also, completion of a residency is considered in promotion and rating of optometrists in certain federal positions such as at the Veterans Affairs Administration.

By tying our professional optometric degree standards to the number of initial matriculates the ACEO is able to evaluate the program's graduation rate as well as licensure rate. Some programs require passage of all or some parts of the NBO National Board examination for graduation while others do not.

According to the National Board of Examiners in Optometry, the ultimate pass rate for the class of 2017 for all candidates attempting all three parts of the examination at least one time prior to September, 2017 was 91.06%.

While this is a high rate there is also some variation in the ultimate passage rate of various programs and using the ultimate pass rate as the sole bright line does not take into account attrition rates or graduation rates.

The ACOE's standard rate or excuse me, standard of 80% also takes into account students who may take more than

4years to complete the rigorous professional optometric degree program. It also considers students who may be from Canada and not required to take the United States National Board for Licensure when they returning to their country but rather the Canadian equivalent.

And also students from other countries who may return to their country of origin to practice after completion of the educational program.

Regarding the Canadian students there are only two OD programs in Canada and in 2015-16 they enrolled a total of about 544 students in all 4 years of their programs. For the same period 8% or 559 of the 7,009 students enrolled into the U.S. programs were Canadian.

Since Canada has its own testing agency similar to the National Board of Examiners of Optometry in the U.S. the Council felt it was important to give consideration to the Canadian process when developing the bright line.

Just for information -- California is the U.S. state with the highest number of residents enrolled in optometry schools and Canada has the second highest number. Regarding attrition rates, the most recent data that has been fully compiled is for 2015. The total number of students leaving a professional optometric

degree program prior to completion was 95 which was 1.4% of the total number of students that year.

Most of the departures were due to academic reasons but a small number were attributed to financial, illness, disciplinary and personal reasons.

CHAIRMAN KEISER: Thank you.

MR. CAMPBELL: You're welcome.

CHAIRMAN KEISER: Primary Readers, do you have any questions?

MR. ETCHEMENDY: Well Dr. Campbell I hope you're proud of yourself, you answered my one question.

MR. CAMPBELL: I am now, thank you.

MR. ETCHEMENDY: No I wanted to thank you all for being here and I want to commend you on the outcomes measures that you're using and really thinking about how to use them and what is the appropriate measure and I'm curious a couple of things -- since you answered my question I'll ask you a follow-up question.

One is how did you settle on the numbers and why is that the right -- are those the right numbers? And on the graduation rate have you -- do you also have any kind of measure, a bright line measure, a not so bright line measure that you look at?

MR. CAMPBELL: Sure I'll tackle the first question first because it is the most involved to try and answer and that's a very frequent question we get is how do we come up with those percentage values?

As you might imagine it was a bit of a process. For the professional optometric degree programs we actually -- the Council initiated a profession-wide summit in 2014. We invited leaders from all of the educational institutions, representatives of the profession -- both the American Optometric Association, the American Academy of Optometry which is our scholarly association. We invited representatives of the American Optometric Student Association which is the organization of our students.

It was -- it was quite a large meeting. That was where that number originated. There were a variety of proposals basically ranging from 70 to 100% and frankly after a lot of deliberation, listening to comments both at that summit and then subsequent written comments that were solicited when we send out drafts of our proposed standards where that number was in there -- the Council settled on 80%.

Is there a hard scientific formula that we use to derive that -- no there is not. It's basically a consensus on what we

felt was appropriate given certain things that may be out of a program's control versus keeping our standards where we want them to be to assure, you know, the quality of the program for the students that enroll.

On residencies while we did not have a summit on that value -- that slightly lower figure was chosen primarily because of the relatively small number of residents that are typically enrolled in programs. If you have a program that enrolls one resident per year and it's something totally non-academic -- the resident gets sick, has an illness and so forth. All of a sudden that makes a big difference whereas in the class size of 60 it might not make that much of a difference and therefore the Council felt that a figure of 70% was appropriate.

MR. ETCHEMENDY: And what did you ask the various bodies that were looking at this because it's obvious -- it's obvious that it shouldn't be a 100%. I mean that follows from the fact that, you know, life happens and so forth and so on.

But it's not clear after that whether it should be 50% or I mean it depends on the test and the passage rate and so forth and so on. So, did you -- I assume you looked at the passage rates for your institutions and said oh, well, you know, you know here's roughly where most of them are.

I hope you didn't pick the numbers so that it was below what everybody was actually achieving.

MR. CAMPBELL: No, actually no, absolutely not. Actually at the time we were developing these information on ultimate pass rates were not as available as they have just become and so a lot of it had to do with information that had been reported by programs.

There's a big difference between first-time passage rate which typically averages around 75-77% and the ultimate passage rate because students have an opportunity to take the test more than once.

What has happened actually since -- so to answer your question the question that we asked during our summit was of the participants essentially we had break-out groups and we asked, you know, what do you feel is appropriate?

And we got quite a range of responses as I alluded to earlier. After that the Council -- I believe we did pick the figure of 80% just after a lot of debate and we sent that out to our community of interest and we asked for comments.

You know here's your proposed new standard what do you think? And I cannot remember precisely but I don't think we got a lot of push-back on the 80% figure so we stuck with it.

MR. ETCHEMEDY: And have you had the opportunity or I don't know if opportunity would -- to as yet have any of the institutions fallen below the standard and you mentioned what you do -- you do, you monitor and then perhaps you send it to the sitting team and so forth and so on.

Can you anticipate -- do you anticipate that in some cases you'll ultimately yank accreditation from a program if it's just --

MR. CAMPBELL: Well if, -- if they fail to meet the standard yes.

MR. ETCHEMEDY: Yeah.

MR. CAMPBELL: To answer your question this standard is very new, as I mentioned it --

MR. ETCHEMEDY: Right.

MR. CAMPBELL: It went into effect July 1st, however the previous bright line which actually was not a standard but was a bright line established through our annual reporting process -- we did have a program that did not meet that and we conducted a focus site visit.

The Council's decision after that site visit was that the program was taking the situation seriously and had implemented changes and essentially we're still watching that

program. Of course they will now fall under the new standard which is actually a lot better because it's in our standards.

MR. ETCHEMEDY: Well congratulations and I thank you for being here, thank you great.

CHAIRMAN KEISER: Any further questions -- Anne?

MS. NEAL: Just a quick question since we have a public representative here. In the course of the day we had Northwest's Commission which indicated to us that Presidents and Chancellors are basically asked to go find members of the public to fulfill their public requirement.

When we had the Liaison Committee on Medical Education, the public members were a professor of pharmacy law and policy as well as a PhD Professor Emeritus with extensive experience in consumer sciences, research, education and publication and obviously you have an excellent background in dentistry which is certainly not optometry.

But I guess my question is as I looked at those regulations over the years and I think a number of us have talked about the importance of a public representative on these bodies. I mean would it be possible for just Joe Public to be on these bodies. I mean just a taxpayer or is it necessary to have PhD's and, and

1 others like that to fulfill this public responsibility?

2 MS. NEUMANN: Well that's kind of a loaded

3 question. I think it helps to have a background in education. It

4 takes a certain amount of time to come up to speed and so I had a

5 learning curve on all the acronyms associated with the optometry

6 profession.

7 I think a thoughtful person without a lot of

8 educational or professional background could do it. They would

9 have to work probably a lot harder but I will say that even though I

10 have you know, understanding of educational pedagogy and

11 comparability of professional -- health professions education I still

12 take sort of the any dummy approach to looking at a program.

13 I'm trying to look at information students get -- is it

14 truthful? I try to take -- play devil's advocate with the optometric

15 members of the Council in terms of you know, are they being

16 consistent, are they being fair -- so yes, I think any thoughtful

17 member of the public can do that.

18 But it's a pretty heavy work load burden. You have

19 to be capable with technology and do a lot of reading and so on

20 and so forth but yes.

21 MR. ETCHEMEDY: Let me ask a follow-up.

22 Have you considered any student involvement?

MR. CAMPBELL: We did anticipate that question.

MR. ETCHEMEDY: I mean we have a -- our student is the smartest person on this Committee.

MR. BEOHME: That's so not true.

MR. ETCHEMEDY: Actually I will say and I'm being very serious here. I was extremely impressed with what LCME has done, I mean that's just amazing. I frankly would like to talk with them and see how they are able to find students who can handle the very heavy load of medical school because optometry school is quite similar.

I mean a typical semester hour credit load is around 21-22 semester hours. To do that and do all of the things that we ask Council members to do is quite a challenge but I was inspired by what they've been able to do.

As a member of the Council -- no. It's certainly something that we can consider particularly from what I've learned today. But to date no, we do involve students as I mentioned earlier when we looked at our latest iterations of the standards we made sure to invite the national student organization and obviously whenever we do a site visit we have dedicated meetings with no faculty or administrators present both with the students at large at the institution and then we have the second meeting with the

student leaders.

So I think that we've got some ideas that we can take just from this meeting and see what we could do with them.

MR. ETCHEMENDY: Great question by John, question of the day.

CHAIRMAN KEISER: Is that a question? Any further questions to the Agency -- sensing none, thank you very, very much.

MR. CAMPBELL: Thank you.

CHAIRMAN KEISER: Dr. Harris it's your turn.

MS. HARRIS: I have nothing to add.

CHAIRMAN KEISER: I would entertain a motion from one of the Primary Readers? Would you put your microphone on please?

MS. NEAL: Sorry, I move to accept the staff recommendation to renew the Agency's recognition for 5 years.

CHAIRMAN KEISER: There's a motion by Anne, second by John. Any further discussion -- I guess we're tired today. All in favor of the motion signify by raising your hand -- all those opposed -- it's unanimous.

NACIQI RECOMMENDATION

To renew the Agency's Renewal of Recognition for 5 years.

CHAIRMAN KEISER: We've come to the conclusion of our day. I was thinking we're going to go to 7, but that's alright, yes?

MR. WOLFF: I'll mention this to you. I wonder if we can get a copy of Diane Jones' remarks just so -- rather than wait for the transcript if they are available. They were quite substantive and I personally would like the opportunity to review them and talk about them and I don't know if there will be an opportunity for us to provide input.

I'm not sure at this meeting but at some future point, but in any event if it's possible to get a copy of them I would very much appreciate it and not wait for the transcript. And it's hard to copy the transcript.

MS. HONG: I'll see what I can do however, you know, it's a separate line of discussion we wouldn't be able to approach Diane's comments at this meeting but if this is something that the Chair wants to put on a future meeting Agenda to discuss and follow-up on we could do that.

CHAIRMAN KEISER: Yeah, there was a lot of good information out of Diane's presentation that would be worthwhile.

MR. WOLFF: Absolutely.

CHAIRMAN KEISER: For us to consider.

MR. WOLFF: And we may have our own REC suggestions about how to streamline our process or staff reviews or the like, so if there is opportunity I'd recommend that we just make the comment that it would be good for not only us to review it but at some future point to be able to provide constructive input.

CHAIRMAN KEISER: Jennifer do you have anything else for today that you want to talk about -- Herman? Anything for the good of the order -- sensing none, we reconvene tomorrow at 8:30 we will see you then.

(Adjourned at 3:50 p.m.)