

**Report of the Meeting**

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

**May 22-24, 2018**



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Arthur E. Keiser, Ph.D., Chair

**TABLE OF CONTENTS**

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

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

**REDUCING REGULATORY BURDEN IN ACCREDITATION.....9**

**BRIEFING ON OUTCOME MEASURES COMPONENT (OM).....10**

**PRESENTATION BY WASC SENIOR COLLEGE AND UNIVERSITY  
COMMISSION.....10**

**FOR-PROFIT CONVERSIONS TO NON-PROFIT STATUS.....10**

**SUBCOMMITTEE ON DATA.....11**

### **DISCLAIMER**

This report summarizes the deliberations of the National Advisory Committee on Institutional Quality and Integrity (NACIQI) at its May 22-24, 2018 meeting. The NACIQI is an advisory committee established by the Higher Education Opportunity Act of 2008, and is subject to the Federal Advisory Committee Act. This report represents the views of the NACIQI. The report has not been reviewed for approval by the Department of Education, and therefore, the report's recommendations do not purport to represent the views of the Department.

## EXECUTIVE SUMMARY

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

NACIQI met to carry out its responsibilities to advise the senior Department official with respect to the recognition of accrediting agencies at its May 22-24, 2018 meeting at the Double Tree by Hilton Washington DC/Crystal City, 300 Army Navy Drive, Arlington, VA.

NACIQI reviewed the following types of applications at its May 22-24, 2018 meeting:

- Seven applications for renewal of recognition from accrediting agencies;
- Four compliance reports from accrediting agencies; and
- One renewal of recognition for a state agency for public postsecondary vocational education.

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

Chairman Keiser opened the meeting and welcomed the Committee and members of the public.

Diane Auer Jones, Senior Advisor to the Assistant Secretary of the Office of Postsecondary Education, shared remarks regarding the Department's plans for reducing regulatory burden in the accreditation space and initiating negotiated rulemaking for accreditation and the recognition process.

NACIQI received a briefing on the outcome measures (OM) component of the Department's Integrated Postsecondary Education Data System (IPEDS) for inclusion in the accreditor dashboards. The WASC Senior College and University Commission (WSCUC) provided a presentation on its Graduation Rate Dashboard tool.

NACIQI also discussed the oversight of for-profit institutions' conversions to non-profit entities to avoid regulatory scrutiny, and the subcommittee on data, Chaired by Roberta Derlin, reported out on its progress.

NACIQI members in attendance for all or part of the meeting included Arthur Keiser (Chair), Frank Wu (Vice Chair), Simon Boehme, Roberta Derlin, John Etchemendy, George T. French, Brian Jones, Richard

O'Donnell, Susan Phillips, Claude Pressnell, Steven VanAusdle, and Ralph Wolff. U.S. Department of Education representatives who participated in the meeting included: NACIQI Executive Director and Designated Federal Official Jennifer Hong, Accreditation Director Herman Bounds, Sally Morgan, Donna Mangold (Office of the General Counsel), Elizabeth Daggett, Nicole Harris, Valerie Lefor, Stephanie McKissic, and Charles Mula.

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

(\*In alphabetical order.)

The following agencies were acted on under NACIQI's consent agenda:

### **Compliance Reports | Accrediting Agencies**

#### **American Osteopathic Association, Commission on Osteopathic College Accreditation**

Action for Consideration: Compliance report

Recommendation: Vote: 13-0 (Recusals: Pressnell)

Renew the agency's recognition for three years.

NACIQI Primary Readers:

Simon J. Boehme

George T. French

#### **American Psychological Association, Commission on Accreditation**

Action for Consideration: Compliance report

Recommendation: Vote: 13-0 (Recusals: Pressnell)

Renew the agency's recognition for three years.

NACIQI Primary Readers:

John Etchemendy

Anne D. Neal

#### **Transnational Association of Christian Colleges and Schools, Accreditation Commission**

Action for Consideration: Compliance report

Recommendation: Vote: 13-0

Renew the agency's recognition for three years.

NACIQI Primary Readers:

Steven Van Ausdle

Claude O. Pressnell, Jr.

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

### **Compliance Report | Accrediting Agency**

#### **American Bar Association, Council of the Section of Legal Education and Admissions to the Bar (ABA)**

Action for Consideration: Compliance report

Recommendation: Vote: 10-1 (Recusals: Etchemendy, Wu)

Renew the agency's recognition for three years.

NACIQI Primary Readers:

Simon J. Boehme

Roberta L. Derlin

Representatives of the Agency:

Stephanie Giggets, Accreditation Counsel | ABA  
Barry Currier, Managing Director | ABA  
William Adams | ABA  
Maureen O'Rourke, Dean | Boston University School of Law

**Renewal of Recognition | Accrediting Agencies**

**Academy of Nutrition and Dietetics, Accreditation Council for Education in Nutrition and Dietetics (ACEND)**

Action for Consideration: Renewal of recognition

NACIQI Recommendation: Vote: 12-2

Renew the agency's recognition for five years.

NACIQI Primary Readers:

Jill Derby  
Richard F. O'Donnell

Representatives of the Agency:

Wanda Eastman, PhD, RDN, LD, Chair | ACEND  
Mary Gregoire, PhD, RD, LDN, Executive Director | ACEND  
Mary Ann Taccona, MBA, RDN, LDN, Associate Executive Director | ACEND

Third Party Comments:

B. Michelle Harris, PhD, MPH, MS, RD, LD, Associate Professor of Nutrition | University of the District of Columbia  
Raeleena Collington, Terrific, Inc.  
Gifty Enniful, Student, University of the District of Columbia  
Madeline Bomberger, Student, University of the District of Columbia

**Accreditation Council on Optometric Education (ACOE)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote: 12-0 (Recusals: Pressnell)

Renew the agency's recognition for five years.

NACIQI Primary Readers:

John Etchemendy  
Anne D. Neal

Representatives of the Agency:

John Bart Campbell, O.D., Chair | ACOE  
Joyce L. Urbeck, Director | ACOE  
Laura M. Neumann, D.D.S., M.P.H., Public Member | ACOE  
Tracy A. Wirth, Assistant Director | ACOE

**Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS)**

Action for Consideration: Renewal of recognition and expansion of scope

Committee Recommendation: Vote 13-0

Renew the agency's recognition for five years and grant the agency's request for an expansion of its scope of recognition to include the accreditation of Associate Degrees.

NACIQI Primary Readers:

George T. French

Susan D. Phillips

Representatives of the Agency:

Bernard Fryshman, Executive Director, Interim | AARTS

Mark Holtzman, Associate Director | AARTS

**Council on Accreditation of Nurse Anesthesia Educational Programs (COANAEP)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote: 10-0 (Recusals: Keiser)

Renew the agency's recognition for five years.

NACIQI Primary Readers:

Brian W. Jones

Richard F. O'Donnell

Representatives of the Agency:

James Walker, DNP, CRNA, FNAP, FAAN, President | COANAEP

Laura Bonanno, DNP, CRNA, Vice President | COANAEP

Francis Gerbasi, PhD, CRNA, Chief Executive Officer | COANAEP

**Liaison Committee on Medical Education (LCME)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote: 12-0 (Recusals: Etchemendy, Pressnell)

Renew the agency's recognition for five years.

NACIQI Primary Readers:

Steven Van Ausdle

Susan D. Phillips

Representatives of the Agency:

LouAnn Woodward, M.D., Dean and Vice Chancellor for Health Affairs and LCME Chair | University of Mississippi School of Medicine

Stephen Ray Mitchell, M.D., Dean for Medical Education and LCME Chair-Elect | Georgetown University School of Medicine

Barbara Barzansky, Ph.D, MHPE, LCME Co-Secretary, American Medical Association | LCME

Veronica M. Catanese, M.D., M.B.A., LCME Co-Secretary, Association of American Medical Colleges | LCME

**National Association of Schools of Art and Design (NASAD)**

Action for Consideration: Renewal of recognition

Committee Recommendation: Vote: 7-4

Continue to permit the agency an opportunity within a 12 month period to bring itself into compliance with §602.16(a)(1)(i) and that it submit for review within 30 days thereafter, a compliance report demonstrating compliance with the cited criterion and its effective application. Such continuation shall be effective until the Department reaches a final decision.

NACIQI Primary Readers:

Kathleen Sullivan Alioto

Representatives of the Agency:

Karen P. Moynahan, Executive Director | NASAD

Richard F. Mann, Legal Counsel | Keller and Heckman LLP

**Northwest Commission on Colleges and Universities (NWCCU)**

Action for Consideration: Renewal of recognition

NACIQI Recommendation: Vote: 8-3 (Recusals: Derlin, Van Ausdle)

Renew the agency's recognition for five years.

NACIQI Primary Readers:

Ralph Wolff

Frank H. Wu

Representatives of the Agency:

Marlene Moore, Ph.D, Interim President | NWCCU

Joseph Brimhall, DC, Chair NWCCU, President of University of Western States | NWCCU

Sonny Ramaswamy, Ph.D., President-Elect NWCCU, Director of the National Institute of Food and Agriculture | NWCCU

Thayne M. McCulloh, D. Phil., Vice-Chair NWCCU, President of Gonzaga University | NWCCU

Randy J. Aliment, JD | Partner | Lewis Brisbois

Scott D. Pulsipher, MBA | President | Western Governors University

David E. Yarlott, Jr, EdD | President | Little Big Horn College

**Renewal of Recognition | State Agency for the Approval of Public Postsecondary Education**

**Puerto Rico State Agency for the Approval of Public Postsecondary Vocational, Technical Institutions and Programs**

Action for Consideration: Renewal of recognition

Recommendation: Vote: 10-0

Defer the agency's recognition for one year – and allow for a single six month extension at the discretion the staff - to allow time for the agency to submit and complete necessary documentation in English in a timely manner to allow for full staff review.

NACIQI Primary Readers:

Roberta L. Derlin

Ralph Wolff

Representatives of the Agency:

Ann (Annie) M. Mockford, Puerto Rico State Approval Agency Executive Director | PR Department of Education

**REDUCING REGULATORY BURDEN IN ACCREDITATION**

Diane Auer Jones, Senior Advisor to the Assistant Secretary of the Office of Postsecondary Education, addressed NACIQI and the public regarding the Administration's interest in

reforming accreditation and the recognition process. She also announced the Administration's plans to place accreditation on the Office of Management and Budget's unified agenda for negotiated rulemaking in 2019.

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

Brian Fu, Program and Management Analyst in the Office of Planning, Evaluation, and Policy Development, provided a briefing on the new look of the accreditor dashboards as well as the integration of OM into the current release. He explained that the OM graduation rates include degree and certificate-seeking undergraduates that are not only first-time full-time students, but part-time and non-first-time students. The OM measure now integrated in the dashboards includes a combined eight-year graduation and transfer rate for these cohorts of students.

### **PRESENTATION BY WASC SENIOR COLLEGE AND UNIVERSITY COMMISSION (WSCUC) ON ITS GRADUATION RATE DASHBOARD (GRD)**

Jamienne Studley, WSCUC President and CEO, and Henry Hernandez, WSCUC CIO, provided a presentation to NACIQI on its GRD, which WSCUC developed and uses as part of its accreditation review of institutions. The GRD tracks institutional level performance related to retention and graduation and looks at six data points and two completion measures: unit redemption rate, and absolute graduation rate (in addition to IPEDS full-time, first-time graduation rate). [WSCUC presentation](#) slides are available on the NACIQI website along with all records of the meetings.

### **OVERSIGHT OF FOR-PROFIT INSTITUTIONS' CONVERSIONS TO NON-PROFIT ENTITIES TO AVOID REGULATORY SCRUTINY**

NACIQI also discussed the [letter from Senators](#) Warren, Brown, Murray, Durbin, and Blumenthal dated January 11, 2018, requesting that NACIQI take a closer look at this issue. As a result of the conversation at the table and the many third-party comments received, NACIQI adopted the following motion: *Set up a subcommittee – pursuant to statute and regulations – to look at the issue of substantive changes, including, but not limited to, for-profit institutions' conversions to non-profit entities, with the understanding that the matter will be returned to NACIQI's agenda.*

#### Third Party Comments:

- 1) Steve Gunderson, President & CEO | Career Education Colleges & Universities
- 2) Aaron Shenck, Executive Director | PAPSA
- 3) Robert Shireman, Senior Fellow | The Century Foundation

- 4) Christopher J. Madaio, Assistant Attorney General | Consumer Protection Division | Attorney General of Maryland
- 5) Nicole Nina Hochsprung Senior Associate, Higher Education | American Federation of Teachers, AFL-CIO
- 6) Tim Powers, Director of Student Aid Policy | National Association of Independent Colleges and Universities
- 7) Gary Steinke, President | Iowa Association of Independent Colleges and Universities
- 8) Liz King, Director of Education Policy | The Leadership Conference on Civil and Human Rights
- 9) Eric S. Juhlin, President & CEO | Center for Excellence in Higher Education
- 10) Tariq Habash, Senior Policy Associate | The Century Foundation
- 11) Clare McCann, Deputy Director for Federal Policy, Higher Education | New America
- 12) Brian Galle, Georgetown University Law Center
- 13) Christian Smith, Organizing Associate | Higher Ed, Not Debt
- 14) David Halperin, Attorney and Counselor
- 15) Douglas Webber, Associate Professor, Department of Economics, Temple University
- 16) Jennifer Wang, DC Office Director, The Institute for College Access & Success
- 17) Yan Cao, Fellow | The Century Foundation
- 18) Sean Marvin, Legal Director | Veterans Education Success
- 19) Monica Owens | Indiana State Conference | American Association of University of Professors
- 20) Josh Lenas | Eastern Michigan | American Association of University of Professors
- 21) Antoinette Flores | Center for the American Progress

## **SUBCOMMITTEE ON DATA**

Roberta Derlin, Chairperson of the subcommittee on data, reported out to the full Committee on the subcommittee's initial meeting which included herself, Ralph Wolff, Claude Pressnell, and Jennifer Hong. After the initial meeting, Chairperson Derlin also solicited membership from Paul LeBlanc and Federico Zaragoza.

Chairperson Derlin explained that the subcommittee discussed its charge to include exploration of the following: striking a balance between policy positions and reviews of accreditors, distinguishing staff review considerations from the Committee review process, consistency in NACIQI's review process, how data is used to inform various success measures, and continued examination of the accreditor dashboards.